# The Food Industry's Provision of Allergen Information to Consumers

A study exploring the provision of allergen information to consumers for non-prepacked foods

## Contents

# Executive summary

## Introduction and methodology

This report presents the findings from research conducted by IFF Research on behalf of the Food Standards Agency (FSA) and Food Standards Scotland (FSS).

The aim of this study is to understand the current provision of information on allergenic ingredients by food businesses to consumers for non-prepacked food, and to see how this has changed since the legislative changes which came into full force in 2014. The Food Information Regulations 2014 together with Regulation (EU) No. 1169/2011 (EU FIC) state that food businesses must inform consumers if any of 14 allergens listed in its Annex II have been added as ingredients or processing aids to foods.

The study also provides a new baseline of understanding for food prepacked for direct sale (PPDS), i.e. foods that have been packed before being offered for sale on the same premises from which they are being sold. This includes exploring food business operators' (FBOs) awareness and intentions in the light of new legislation[1] coming into effect in 2021, which requires them to provide full ingredients labelling for PPDS foods.

The study comprised of four stages:

- **An initial scoping phase, comprising of nine qualitative telephone interviews with key industry stakeholders** including trading standards officers (TSOs) and environmental health officers (EHOs); industry representatives; consumer representatives; and policy experts. Interviews took place between December 2019 and January 2020.
- **A core quantitative telephone survey of 2,303 FBOs across the UK.** Survey fieldwork took place via computer-assisted telephone interviewing (CATI) between February and March 2020. Results for these interviews are weighted to be representative of all UK FBOs selling non-prepacked foods.

[1] This legislation will come into effect in Northern Ireland, Wales and England on the 1st October 2021. At the time of writing, in Scotland the statutory instrument is still proposed, and so the legislation is not yet in place.

Differences noted in the report commentary are statistically significant at the 95% level of confidence unless stated otherwise.

- **A separate quantitative telephone survey of 55 market traders.** These respondents were recruited via visits to markets across the UK, with interviews also completed via CATI. Due to a lack of reliable population data, these results are unweighted and reported in a separate chapter.
- **Qualitative follow-up interviews with 21 FBOs and market traders who took part in the quantitative surveys.** Interviews took place in September and October 2020.

Unless stated otherwise, the following results are taken from the core quantitative survey of 2,303 FBOs across the UK. It is important to note that survey interviews do not capture businesses' actual behaviour. What respondents say they do is *reported* behaviour. This should be borne in mind when reading this report.

## The current provision of allergen information

### Allergen labelling policies

Almost all FBOs (95%) reported having a written (83%) or informal policy (12%) in place on allergen labelling, a large increase on 2012 levels (60%).[2] The proportion with a written policy has doubled between 2012 and 2020. Just four per cent did not have any policy in place. Not having a policy in place on allergen labelling was more commonplace among delicatessens (11%), leisure and entertainment (9%) establishments; general retail (7%) establishments and institutions (7%). Delicatessens were also more likely to have informal policies (20%), as were cafes (18%).

### Provision of information

Reflecting the impact of the 2014 legislation, the vast majority of FBOs provided written or verbal information about each of the allergens they sold, ranging from 93% for mustard, and 94% for lupin, sulphur dioxide and molluscs, to 98% for gluten. Collectively, around nine in ten FBOs (88%) provided written or verbal information on *all* of the 14 allergens they sold that are covered by the EU FIC regulation. In contrast there had been much wider variation for this measure in the 2012 survey, with only around half of FBOs or fewer providing information on mustard (51%), celery (50%)

[2] The survey question asked, 'do you have a written or informal policy on allergen labelling within your business?', with an additional optional prompt explaining that 'a policy is a guideline or procedure for staff to follow'. Respondents could choose between having a 'written' or 'informal' policy or not having a policy in place at all.

and sulphur dioxide (44%), rising to four-fifths for peanuts (80%) and other nuts (81%).

Nearly every FBO surveyed (99.8%) used at least one method to provide information on food allergens to consumers, rising from 93% in the 2012 survey. The proportion of FBOs that had used both written and verbal methods to communicate allergens information increased sharply (95%, up from 64% in 2012), while the proportion that had only used verbal methods has decreased to just three per cent, compared with 22% in 2012. The most common methods used to provide information on food allergens were verbal communication (92%), booklets or leaflets available on request (77%) and signs or stickers asking customers to tell staff if they have an allergy (77%).

### Precautionary advice warnings and free from labelling

More than half (55%) of FBOs said they used precautionary advice warnings on their foods, such as 'may contain' labelling. In 2012, just three in ten (29%) of FBOs used 'may contain' labelling specifically.[3] While not a like for like comparison, these results suggest the use of precautionary advice warnings is increasing. The use of precautionary warnings was more common among retailers (70%), specifically general retail businesses (78%) and bakers (72%). Qualitative follow-up interviews found that precautionary labelling was used to protect both consumers and businesses. Businesses felt that by addressing cross-contamination risks, customers could make informed decisions about allergen risks when purchasing foods. At the same time, some businesses felt doing this also reduced their liability if a customer had an allergic reaction. Only a few businesses mentioned drawbacks to precautionary labelling, including this labelling being too ambiguous or restrictive to consumers, and challenges in keeping precautionary labelling up to date when menus change.

Businesses usually relied on information provided by suppliers or their head office (if a chain) to determine when precautionary labelling should be used. Some checked the precautionary labels on their suppliers' products to determine what to include in their own labelling, while others received labelling from suppliers or their head office. It was however rare for businesses to do their own analytical testing such as swab tests at their own premises.

[3] In the 2012 survey FBOs were asked specifically whether they used 'may contain' labelling. In the 2020 survey FBOs were asked about whether they used precautionary labelling, such as 'may contain' labelling. This change was made to cover variations in the wording of precautionary allergen labelling.

The use of 'free from' labelling also increased among FBOs; three in ten (31%) used it, compared with just 13% in 2012. Institutions were most likely to use this labelling (40%), particularly pre-primary and primary education establishments (45%), while it was also more common among general retailers (39%).

During scoping interviews many stakeholders identified 'may contain' and 'free-from' labelling as problem areas. It was felt that such labelling was inconsistently applied to food products and not necessarily based on thresholds or risk assessments. As precautionary allergen labelling such as 'may contain' is not mandatory, it was felt by some that it would be clearer not to have it at all.

**Checking allergenic ingredients**

Almost all FBOs (99.9%) had processes in place to check if a product contains allergenic ingredients if asked by consumers. In 2012, eight per cent either did not have a process or were unsure. The most common ways of checking for allergenic ingredients was to refer to a handbook or information sheet (62%); checking packaging or labels (33%) or asking the head chef (25%). The responsibility for checking allergenic ingredients typically lies with the owner or manager of the site (67%, rising to 82% among those with one to four employees) or the head chef (32%).

**Checking and auditing ingredients from suppliers and wholesalers**

Stakeholders in the scoping interviews considered that checking or auditing ingredients from suppliers and wholesalers was a key risk area. They felt that smaller FBOs were likely to face more challenges with auditing ingredients because their supply chains were more fluid and fragmented, unlike larger FBOs which typically have tightly managed supply chains.

In the survey, approaching nine in ten (86%) FBOs said that they always (66%) or sometimes (20%) check or audit the ingredients they obtain from suppliers and wholesalers, compared with seven in ten (71%, 50% always, 21% sometimes) in 2012. There are still around one in eight FBOs (12%) that never conduct checks on the ingredients they receive from suppliers and wholesalers. When combined with the proportion that sometimes carry out checks, this means a third of FBOs (32%) do not always check the ingredients they received from suppliers and wholesalers. General retail businesses were the most likely sector not to always check ingredients (53%).

**Recording information**

The majority (87%) of FBOs that conduct checks or audits on ingredients recorded information from these checks at their establishment, increasing from just a third (35%) reporting this in 2012. The most common method used to record information was in hard copy at the site (62%).

The majority (90%) of FBOs that provide information about allergenic ingredients to consumers update or review their methods of communication every time the products they sell change; this compares to around two-thirds (65%) reporting this in 2012. Close to one in ten FBOs (8%) do not do this, with this more likely among smaller FBOs with one to four employees (15%). The most common reason given for not updating or reviewing the methods used to communicate allergen information was that changes were never made to the food sold (42%).

## Business processes and staff training

**Documentation and guidance on food allergen labelling**

Most FBOs (83%) reported that they had read documentation or guidance on food allergen labelling, and prevalence of this had increased since 2012 (50%).[4] Reading documentation or guidance was less common among FBOs in Northern Ireland (78%) and Scotland (79%). The most common sources of information used were the internet (31%, up from 16% in 2012) and the FSA (29%, up from 18% in 2012). Around one in six FBOs that had read documentation used local authorities or trading standards officers as a source (16%), although this was more common in Northern Ireland and Wales (25% and 23% respectively) and among butchers (31%), delicatessens (26%) and cafes (21%). FSA documentation was used most by the hotels sector (40%) and least among the general retail sector, and pubs and bars (20% and 21% respectively).

**Formal training on food allergen labelling**

Formal training on food allergens (i.e. training that takes place away from usual work activities) was undertaken by half (49%) of FBOs, increasing from a third (34%) reporting this in 2012. Formal training was more common among larger FBOs with 11 or more employees (52%). Butchers stood out as the least likely sector to have

[4] Note – this information is based on what survey respondent self-reported and may not reflect their actual behaviour.

received formal training (32%). Training was also less prevalent among sites where the owner's first language was English; more than half (52%) had *not* trained, compared with 44% of sites where the owner spoke a different language.
Formal training was most commonly provided through private provision or consultants (29% of those that received formal training) and employers, including head offices (28%). The proportion of FBOs that received training from their employer increased with size, ranging from 15% of FBOs with 1-4 employees to 38% of FBOs with 11 or more employees. In line with this, larger FBOs with 11 or more employees were less likely to use private providers (26% vs 29% overall), colleges or education institutes (8% vs. 12% overall) and unspecified online resources (6% vs. 9% overall) for formal training provision. Retailers were much more likely to receive formal training from their employer (45%) than the catering sectors (26%) and institutions (22%), although this was driven by particularly high prevalence among the general retail sector specifically (63%).

Follow-up interviews suggested that many businesses undertook a combination of formal external training courses (e.g. Food Hygiene Level 2) and in-house training, which varied from flexible on-the-job learning to more structured training programmes, including online courses and assessments. Commonly, senior staff or kitchen staff attended external courses and filtered knowledge down through the organisation.

**FSA and FSS website resources**

The vast majority of FBOs (91%) were aware of at least one of the prompted six FSA or FSS website resources.[5] Awareness was highest for advice or guidance webpages (79%), posters (74%) and technical guidance (73%), although all sources were known by the majority of FBOs.

A large majority of FBOs (83%) had also used at least one of these resources and approaching three in five (57%) had used three or more. FBOs in England and Wales (57% and 62% respectively) were more likely than those in Northern Ireland and Scotland (48% and 50% respectively) to have used three or more of the prompted resources. Advice and guidance webpages were the most commonly used resource (58%), while posters (55%) were the only other resource used by the majority of FBOs.

[5] The six prompted FSA/FSS resources were FSA's technical guidance ('Food allergen labelling and information requirements under the EU Food Information for Consumers Regulation 1169/2011: Technical Guidance'); advice or guidance webpages; e-training on allergens; posters; recipe sheets; and menu grids or templates.

Among those that had used any of the FSA/FSS resources, there was no stand-out resource in terms of usefulness. Advice or guidance webpages were most often chosen as the most useful resource (19%), closely followed by e-training (18%) and posters (16%). However, given that these results are driven, in part, by how prevalent the use of each resource is, it is worth noting the views of FBOs that had used all six of the prompted resources. These results suggest that e-training on allergens is the most popular resource (21%), although a similar proportion of FBOs (22%) said all of the resources were equally useful.

### Food allergen information provided to staff

FBOs were asked to select from a prompted list the methods used to provide staff with allergen information. The most common method was giving staff verbal training (90%), closely followed by formal training for all new staff (88%). Posters on walls were also a relatively common way of sharing allergen information with staff. The least commonly used methods out of those prompted were information leaflets (48%), being given a copy of the FSA's technical guidance (49%) and being given booklets on allergy control (51%). Use of each prompted method had increased from 2012 levels.

### Formal systems to control cross-contamination

During scoping interviews, one of the most commonly mentioned risk areas in terms of allergens was cross-contamination. This was typically felt to be a greater risk amongst smaller FBOs like cafes and takeaways. This is because these businesses generally prepare food on site, have small kitchens and have less stringent controls in place around food preparation.

In the survey, almost all food businesses (96%) had formal systems or practices in place to prevent cross contamination in relation to food allergens, increasing from around three-quarters (76%) in 2012. Retailers were least likely to report having such systems (91%). The most common systems implemented to prevent cross contamination included use of separate chopping boards and utensils (63%, up from 48% in 2012), separate work areas (49% vs 46% in 2012) and separate food storage methods (45% vs.14% in 2012).

## Reflections on the 2014 Food Information Legislation

More than two in five (44%) FBOs said they had faced challenges around the 2014 legislation, leaving a slight majority (53%) that had not faced any challenges (three per cent were unsure). Prevalence of challenges was greater among FBOs in Northern Ireland (53%) and increased with size, ranging from 39% of FBOs with one to four employees having faced any, to 48% of those with 11 or more employees. Those in catering sectors were more likely than retailers to have faced challenges (47% and 35% respectively). The most common challenges (among those who faced them) were remembering to update and keep on top of allergen information (30%, rising to 51% among takeaway restaurants); staff training and awareness (23%) and the time it takes to regularly update information (18%).

## Awareness and perceptions of the 2021 food information amendment

**Current labelling practices for PPDS foods**

Four in every five FBOs selling PPDS foods (78%) currently label all allergenic ingredients on PPDS foods (62% label all ingredients). These results suggest that most FBOs would be compliant with the incoming/proposed[6] amendment without needing to change their current labelling practices. Labelling all allergenic ingredients was less common in Scotland (68%), while those operating in catering sectors were also less likely to do this than retailers (72% vs. 84%).

Follow-up interviews suggested that those already labelling intentional ingredients on their PPDS foods did so because they considered it best practice and wanted to provide customers with maximum information about allergens. Some also felt they were covering the business in terms of liability despite the legislative requirement to provide full ingredients labels not coming into force until 2021.

Some businesses only labelled the 14 main allergens on PPDS foods. This was because they considered it to be best practice in terms of customer safety and business liability. Those not labelling ingredients at all mentioned communicating this information through other means, such as verbal discussions.

[6] At the time of writing, in Scotland this amendment is still proposed as the legislation has not yet been made.

### Awareness of the food information regulations amendment

In October 2021 new legislation will come into effect which will require food businesses to provide full ingredients labelling for PPDS foods.[7] Overall, 59% of FBOs were aware of the food information amendment, although this increased to 64% among those selling PPDS foods and to four in five FBOs that *only* sold PPDS foods (79%). Among those that sold PPDS foods, the catering sector (60%) was least aware of the new amendment, driven by particularly low levels of awareness among restaurants and cafes (52%).

### Potential challenges around implementing the amendment

After being prompted with the key details of the food information amendment for PPDS foods, the majority (79%) of FBOs selling PPDS foods felt it would be easy to comply (38% felt it would be very easy). In the follow-up interviews, those who felt complying would be easy cited the fact that they already had labelling processes in place or that the reforms would have little impact because of their limited range of PPDS products. In contrast, key stakeholders in the scoping interviews felt smaller FBOs, in particular, lacked the resources to comply. Cost and time implications were also mentioned as challenges by businesses in follow-up interviews, although some felt these would only be short-term concerns.

Survey results showed that FBOs in England were more confident about complying (81% felt it was easy, compared with 70% in Scotland, 68% in Wales and 57% in Northern Ireland). Larger firms with 11 or more employees were most optimistic about their ability to comply (84%, compared with 75% of those with fewer than 11 employees). Those who felt complying would be difficult expected the main challenges to be the time it would take to introduce and update labelling (51%) and ensuring that the correct labelling is used (44%).

[7] This legislation will come into effect in Northern Ireland, Wales and England on the 1st October 2021. At the time of writing, in Scotland the statutory instrument is still proposed, and so the legislation is not yet in place.

**Types of information that would help FBOs comply**

The majority of FBOs said that each of the seven prompted formats of information would help them comply (70% selected at least five of the seven formats), suggesting that the FSA, the FSS and its partners will need to make a diverse package of resources available to FBOs on the amendment.[8] The most popular types of guidance were online documents and guidance (90%), hard copy booklets and documents (85%) and online videos (82%). Follow-up interviews echoed the need for clear guidance, provided online or in hard copy by the FSA / FSS and EHOs.

## Market Traders

Mirroring the broad approach taken in 2012, further to the main survey of food businesses, 55 interviews were conducted with market stalls and mobile food vans.

A large majority of market traders (93%) had either a written (78%) or informal (15%) policy on allergen labelling in place, increasing from 57% that had a policy in 2012.[9] All market traders provided allergen information their customers, and in almost all cases (95%) this was provided through both verbal and written methods. Similarly, the vast majority (94%) of market traders show all the allergenic ingredients on the packaging of the PPDS foods they sell.

More than two-fifths (44%) of market traders used precautionary advice warnings, such as 'may contain' labelling, more than double the proportion reported in 2012. Fewer used 'free from' labelling (18%), a proportion which has remained steady from 14% in 2012.

Most market traders checked or audited ingredients from suppliers and wholesalers (89%). Three quarters (75%) of market traders always checked ingredients, 15% sometimes checked and 7% never checked. In comparison, 36% never checked ingredients in the 2012 survey.

[8] The seven prompted formats included online documents and guidance; hard copy booklets or documents; online videos; helplines; information or advice provided face-to-face; case study information; and workshops and seminars.

[9] Note – these findings were not weighted due to the lack of available population information and therefore no direct comparisons have been made to the main weighted survey findings.

In terms of internal business processes, most market traders had read documentation or guidance on food allergen labelling (85%), increasing from the proportion that did this in 2012 (54%). The FSA was the most popular source used (30%). Around half of market traders (51%) had received formal training on food allergens, and the vast majority (89%) had provided staff with allergen information including the risks of cross contamination using at least one of the prompted methods, including, most commonly, staff being given verbal (71%) or formal training (69%).

Most market traders were aware of FSA/FSS website resources – seven in ten (69%) said they were aware of three or more of those prompted and eight in ten (80%) had used at least one resource. The most common resources used were advice and guidance webpages and the FSA's technical guidance (each used by 60% of market traders), with the latter being the most popular resource.

Overall, two-thirds (67%) of market traders said they had not faced any challenges associated with the 2014 legislation. Market traders selling PPDS foods were also optimistic about being able to comply with the 2021 food information amendment; 16 out of the 17 market traders in scope thought complying would be easy.

Findings from the follow-up in-depth interviews with market traders are included alongside those of the other follow-up interviews throughout the report. This is due to only a very small number (two) of market trader interviews being completed in this phase of the study, which was insufficient to draw out patterns or themes unique to this subgroup of food businesses.

**Conclusions**

The 2014 legislation has had a positive impact on the food industry and has improved food safety for consumers. The vast majority of businesses reported compliant behaviour in terms of providing allergens information to their customers, and most reported thorough internal processes in place to ensure the information they provide is correct and that staff have the appropriate knowledge required to communicate this information. Results across most key measures have demonstrably improved since the 2012 survey.

Auditing practices had improved since 2012; two-thirds of FBOs (and three-quarters of market traders) reported always checking or auditing ingredients obtained for suppliers and wholesalers, compared with around half before the legislation was introduced. Despite this, it still leaves a third of FBOs that do not always check ingredients. This suggests that there is still some risk that incorrect information could be provided to consumers.

The findings were largely positive in relation to the new PPDS amendment; the majority of businesses affected by these regulations were aware of the changes and were also optimistic about how easy it would be to comply. Most businesses selling PPDS foods already labelled ingredients on their PPDS foods, with follow-up interviews suggesting that this is because they consider it best practice to inform their consumers about allergen risks. Some businesses felt there would be challenges around the time it would take to update or introduce labels, with follow-up interviews suggesting this issue would be particularly acute for those not already labelling ingredients and businesses who have a large range of PPDS foods. The survey found that restaurants and cafes showed lower levels of preparedness.

It is important that the FSA and its partners continue to produce and promote a range of resources to help FBOs comply with the existing food information regulations and the new PPDS amendment.

# Glossary

| Term | Definition |
|---|---|
| Allergen | A substance capable of triggering a response that starts in the immune system and results in an allergic reaction in certain individuals. In the case of foods, it is a protein which is found in food capable of triggering a response in individuals sensitised to it. |
| Cross-Contamination | The unintentional presence of another substance in a product. In the context of allergens, it usually refers to trace amounts of allergenic foods present in a final product and which may be problematic for those allergic to that food. |
| Food Allergy | A food allergy is a reproducible reaction, which occurs when the body's immune system reacts abnormally to specific foods. |
| Prepacked foods | Prepacked foods are foods which have been placed into packaging before sale, normally at a site separate from that where the product is sold to the customer, where there is no opportunity for direct communication between producer and customer. If these foods use any of the 14 allergens listed in the Regulation as ingredients or processing aids, they are required to be labelled clearly on the packaging |
| Non-prepacked foods | Non-prepacked foods incudes foods that are sold loose, food packed on a sales premises at the consumers' request, food in packaging that can be altered without opening or changing the packaging, and food that is prepacked for direct sale. For example, in a retail environment this would apply to any foods sold loose from a delicatessen counter (e.g. cold meats, cheeses, quiches, pies and dips), fresh pizza, fish, salad bars, bread sold in bakery shops etc. In a catering environment this would apply to foods which are sold not prepacked, for example, from a canteen or meals served in a restaurant or from a takeaway |
| Prepacked foods for direct sale (PPDS) | Prepacked foods for direct sale are foods that have been packed by the same business on the same premises from which they are then sold (e.g. sandwiches, bread and cakes from a bakery and in store deli counters). |

# Introduction

## Background

This report presents the findings from research conducted by IFF Research on behalf of the Food Standards Agency (FSA) and Food Standards Scotland (FSS).

The FSA is an independent government department responsible for protecting public health and consumers' interests in relation to food across England, Wales and Northern Ireland. Since 2015, FSS has performed the equivalent role in Scotland.

As part of their function to protect public health, the FSA and the FSS play an important role in ensuring that members of the public are protected from potentially life threatening food hypersensitivities by working with the food industry to ensure food labelling allows consumers with food hypersensitivities to make safe and informed choices.

The EU Food Information to Consumers Regulation (FIC), which came into effect in December 2014, made it a legal requirement for UK food businesses serving non-prepacked foods including prepacked foods for direct sale (PPDS), to inform their customers if any of 14 main allergens were used as an ingredient.[10]

- Most non-prepacked foods are sold 'loose' without any packaging to alert customers to their composition, including, for example, foods sold from a delicatessen counter (e.g. cold meats, quiches and cheeses), bread or pastries sold without wrapping in bakery shops or meat from a butchers. In a catering environment this is likely to apply to foods from a takeaway or meals served in a canteen or a restaurant.

- Prepacked foods for direct sale (PPDS) are foods that have been packed before being offered for sale by the same food business on the same premises or site as they are being sold. This could include, for example, pies and sandwiches which are sold from the premises in which they are made. It also applies to food that is packed before being offered for sale on other premises if the food is offered for sale from a moveable and/or temporary premises by the same food business who packed it (e.g. market stalls, mobile sales vehicles).

[10] The list of 14 allergens is provided on the FSA website.

Under the Food Information Regulations (FIR) 2014, food businesses currently have a choice in how they provide allergen information for non-prepacked food and PPDS foods to consumers.[11] For example, it can be provided in written form, verbally or a combination of the two.

In 2019, following a UK-wide consultation , it was announced that new legislation regarding information provided for PPDS foods would come into effect in England in October 2021.[12] Under the new amendment, PPDS foods will need to be sold in packaging that clearly displays the name of the food and a full ingredients list with allergenic ingredients emphasised. Identical legislation has been laid in Wales and Northern Ireland and similar changes are also proposed for Scotland.

## Aims and objectives

In 2012, in advance of the introduction of the FIC, the FSA undertook research with food businesses to understand the existing provision of allergen information for non-prepacked foods and PPDS foods.[13]

The primary aim of this current study was to build on the 2012 baseline study, providing insight into the current provision of information on allergenic ingredients for non-prepacked foods and how practices have changed since the FIC came into effect in 2014. In addition, the research aimed to assess food business awareness and readiness for legislative changes regarding information requirements for PPDS foods.

To achieve these aims the following research objectives were set:

- To explore the prevalence and type of information currently provided by Food Business Organisations (FBOs) in relation to allergenic ingredients;
- To explore why information currently is or is not provided and identify the barriers that prevent information on allergenic ingredients being provided;
- To understand the sources of guidance FBOs use to help them comply with current regulations;
- To identify what is missing and what can be improved in terms of current support offered;

[11] The Food Information Regulations (FIR) were introduced in England to establish the enforcement measures for the FIC. Equivalent legislation was introduced in Northern Ireland, Scotland and Wales
[12] More information about the new legislation can be found here.
[13] Deborah Smeaton and IFF Research (2013), Baseline Study on the Provision of Allergy Information to Consumers for Foods which are not prepacked

- To understand the extent of training received by FBOs on food allergens and who provides this training;
- To find out to what extent, and how, FBOs check or audit ingredients from suppliers to ensure compliance with regulations on allergens, and to what extent they follow FSA guidance on doing so;
- To explore the prevalence of 'may contain' and 'free-from' claims in non-prepacked foods;
- To establish what formal systems FBOs have in place to avoid cross-contamination in non-prepacked foods;
- To measure awareness and views of the new amendment for PPDS foods;
- To understand current PPDS labelling practices; and
- To explore any anticipated barriers to implementation and support needed to comply with the amended PPDS food regulations.

# Methodology

In order to meet the objectives outlined in the previous chapter, a multi-method research approach was undertaken. The study comprised of four phases combining survey and qualitative research techniques:

- A scoping phase comprising of nine qualitative interviews with key industry stakeholders to ensure up-to-date knowledge of business landscape;
- A quantitative survey of 2,303 food business operators (FBO) to enable robust statistical analyses of FBO practices in relation to allergens;
- A small survey of 55 market traders (stalls and mobile food vans).
- Follow-up qualitative interviews with 21 FBOs and market traders that had taken part in the survey to provide in depth insight into particular areas of interest

This chapter summarises each phase of the study. More detailed information can be found in the technical annex.

## The scoping phase

The scoping phase of the study involved qualitative telephone interviews with key industry stakeholders. These interviews took place between December 2019 and January 2020 with the following stakeholders:

- 2 Trading standards officers;
- 1 Environmental health officer;
- 2 Industry representatives;
- 2 Consumer representatives; and
- 2 Policy experts

These individuals were selected due to their involvement in the food industry and awareness of food allergen related issues. Respondents were initially contacted by the FSA before their details were supplied to IFF Research, who then recruited the respondents for interview via email and telephone. As a scoping phase, however, the aim was not to achieve a representative sample of views and experiences, rather to gain an indication of some of the issues, from different perspectives, that warranted further investigation at later stages of the study.

The purpose of these interviews was to provide initial insight into how the food industry landscape has changed since the 2012 study. Exploring the views of these stakeholders helped to frame the terms of the study and identify themes to explore further in the survey phase, both in terms of how businesses and consumers have responded to the 2014 legislation, and potential challenges around the upcoming food information regulation amendment on PPDS foods. The scoping stage also ensured the correct language was deployed and that the survey engaged with concerns from a variety of perspectives.

The scoping data collection took the form of semi-structured interviews via telephone, lasting up to an hour.

## Telephone survey

### Methodological overview

The core telephone survey of food businesses was designed to meet all of the study objectives outlined in the introduction to this report. The survey provided up-to-date information on business practices in relation to allergen information provision which could be compared to results from the 2012 baseline study, as well as new insight into the awareness of and likely challenges food businesses selling PPDS foods will face in light of the upcoming PPDS amendment in 2021.

Interviews were conducted via a computer-assisted telephone interviewing (CATI) method with food businesses of all sizes across the UK selling non-prepacked foods, including:

- Foods sold non-prepacked i.e. 'loose', without any packaging to alert customers to their composition;
- Food packed on a sales premises at the consumers' request;
- Food in packaging that can be altered without opening or changing the packaging; and / or
- Foods packaged on the same premises from which they are sold, known as prepacked for direct sale (PPDS).

The latter group were of greater significance for the 2020 study, in light of the PPDS information regulation amendment, which will require food businesses to provide full ingredients labelling for PPDS foods. Screening questions were adapted to ensure that these businesses could be disaggregated from those selling other non-prepacked foods and could be routed to questions about the legislative changes.

Interviews were conducted at establishment level, to ensure that the research could capture localised experiences and understand what is happening 'on the ground' in terms of the provision of allergen information to customers and the practices adopted by businesses to ensure they comply with the law. This meant that interviews could be conducted with more than one branch of a single organisation, although the number of branches was capped at five per organisation.

The target respondent for the survey was the most senior person at the establishment with responsibility for food safety, which in the case of smaller businesses, tended to be the owner or manager. Their suitability was verified at the outset of the interview using a screening question agreed in conjunction with the FSA which ensured that they had a comprehensive overview of the provision of allergen information at that site.

There were some drawbacks to interviewing the most senior person at the establishment responsible for food safety. For instance, it is possible that these individuals are less aware of routine practices that happen 'on the ground' and the way these may deviate from the top down directive. Similarly, there is the potential for social desirability bias by speaking to more senior individuals – i.e. they may have specific interest in showing that their business is fully adhering to legislative requirements. On balance, however, it was decided that these individuals were most likely to have the required breadth of knowledge about their business' policies and practices to answer the survey questions accurately.

**Sampling**

Relevant sectors to the research were selected using the UK Standard Industrial Classification (SIC) 2007 and included hospitality businesses, specialist food retailers, general retailers, contract caterers and catering within institutions. The specific SIC codes identified for the research are listed in Table 1.

**Table 1: Sectors covered by telephone survey**

| UK SIC 2007 Sub-class - SIC description | Survey grouping |
|---|---|
| 47.22: Retail sale of meat and meat products in specialised stores | Butchers |
| 47.24: Retail sale of bread, cakes, flour confectionery and sugar confectionery in specialised stores | Bakers |
| 47.23: Retail sale of fish, crustaceans and molluscs in specialised stores | Fishmongers |
| 47.29: Other retail sale of food in specialised stores | Delicatessens |
| 47.11: Retail sale in non-specialised stores with food, beverages or tobacco predominating | General retail |
| 47.19: Other retail sale in non-specialised stores | General retail |
| 47.30: Retail sale of automotive fuel in specialised | General retail |
| 55.10: Hotels and similar accommodation | Hotels |
| 56.30/2: Public houses and bars | Pubs and bars |
| 59.14: Motion picture projection activities | Leisure and entertainment |
| 93.11: Operation of sports facilities | Leisure and entertainment |
| 93.21: Activities of amusement parks and theme parks | Leisure and entertainment |
| 84.22: Defence activities | Institutions and large employers[14] |
| 84.23: Justice and judicial activities | Institutions and large employers |
| 85.10: Pre-primary education | Institutions and large employers |
| 85.20: Primary education | Institutions and large employers |
| 85.31: General secondary education | Institutions and large employers |
| 85.32: Technical and vocational secondary | Institutions and large employers |
| 85.41: Post-secondary non-tertiary education | Institutions and large employers |
| 85.42: Tertiary education | Institutions and large employers |
| 86.10: Hospital activities | Institutions and large employers |
| 87.10: Residential nursing care activities | Institutions and large employers |
| 87.90: Other residential care activities | Institutions and large employers |

[14] Large employers were sampled across all SIC codes outside of those selected for the core survey groups.

| UK SIC 2007 Sub-class - SIC description | Survey grouping |
|---|---|
| 87.20: Residential care activities for learning disabilities, mental health and substance abuse | Institutions and large employers |
| 87.30: Residential care activities for the elderly and disabled | Institutions and large employers |
| 56.10/1: Licensed restaurants | Restaurants and cafes |
| 56.10/2: Unlicensed restaurants and cafes | Restaurants and cafes |
| 56.10/3: Take away food shops and mobile food stands | Restaurants and cafes |
| 56.21: Event catering activities | Caterers |
| 56.29: Other food service activities | Caterers |

Within the institutions and large employers grouping, specific sectors were sampled to ensure that establishments dealing with vulnerable members of the public (including the very young, old or dependent) were also covered by the research. As such, establishments within the pre-primary and primary education, hospital activities and other nursing or residential activities sectors were deliberately included.

The 2020 survey mirrored its 2012 predecessor in terms of sector profile with two exceptions:

- The transport sector was not retained as one of the sample groups for the 2020 survey. The 2012 survey found that there were various barriers to tracking down suitable respondents in the transport sector. In the first instance, where the sample was sourced, telephone numbers provided were generally for offices or administrative centres rather than the actual modes of transport themselves. Additionally, when the contact information was correct the target respondent typically worked on board that particular mode of transport and was rarely in a fixed location.
- Leisure and entertainment establishments were included due to policy interest in how businesses such as cinemas and bowling alleys behaved in relation to providing information on allergens in the foods they sell or serve.

Contact details and basic sample information such as size and sector, were purchased from Market Location, which is one of the UK's most comprehensive business databases. The main survey adopted a stratified random sampling approach whereby the business population was divided into sector subgroups (or strata) and within each stratum a subset of food businesses was selected for survey entirely at random.

Establishing the survey population was the first step of this process. There is no publicly available population data for businesses selling non-prepacked foods, however it was possible to estimate population data by using eligibility rates from the 2012 survey (i.e. the proportion of all food businesses found to sell non-prepacked foods, collated at sector level), and applying these rates to latest UK-level business population data from the Inter-departmental Business Register (IDBR) held by the Office for National Statistics.[15]

Once the survey population had been derived, interview targets were initially allocated in proportion to the survey population, but then modified to oversample sectors where sample sizes would have been too small for robust analyses. These UK-level targets were then split proportionately to agreed targets by country. The sampling process also ensured a representative size profile within each sector, although no quotas were set on size; instead this was left to fall out naturally in the survey.

### Questionnaire design and pilot

Given the objectives of comparing the 2020 survey with the 2012 baseline survey, it was important to retain many of the core survey questions in their original form. However, changes were required in order to incorporate a new set of questions on the upcoming legislative changes for PPDS foods, and to adapt screening questions to capture food businesses eligible for these questions. A pilot of 30 interviews was conducted to ensure the amended questionnaire flowed well and to check the interview ran to a suitable length. Pilot fieldwork was conducted between 11th February and 13th February 2020. Following the pilot, some small refinements were made to the questionnaire.

### Mainstage fieldwork and profile of interviews

In total, 2,303 interviews were conducted between February and March 2020. Although the original interview target was 2,700 interviews, fieldwork was terminated early due to the implications of the Covid-19 outbreak.

The final profile of the interviews achieved by sector, size, country and whether or not the food business was independent, or part of a chain, is detailed in Table 2.

Survey results were weighted so that findings were representative of UK businesses operating within these sectors selling non-prepacked foods. More information on

[15] More information on the IDBR can be found on the ONS website.

sampling, weighting and the survey methodology can be found in the technical annex.

**Table 2: Profile of FBO survey interviews**

| Survey group | Unweighted column % | Weighted column % | Number of interviews |
|---|---|---|---|
| England | 45 | 84 | 1,029 |
| Northern Ireland | 16 | 3 | 366 |
| Scotland | 20 | 9 | 463 |
| Wales | 19 | 5 | 445 |
| 1 to 4 | 25 | 26 | 573 |
| 5 to 10 | 29 | 29 | 673 |
| 11+ | 46 | 45 | 1,057 |
| **Catering** | **63** | **70** | **1,444** |
| Hotels | 5 | 5 | 124 |
| Pubs and bars | 9 | 9 | 203 |
| Leisure and entertainment | 3 | 1 | 61 |
| Restaurants and cafes | 39 | 46 | 891 |
| Caterers | 7 | 10 | 165 |
| **Retailers** | **20** | **13** | **467** |
| Butchers | 4 | 3 | 98 |
| Bakers | 4 | 3 | 101 |
| Fishmongers | 1 | <0.5 | 30 |
| Delicatessens | 4 | 1 | 88 |
| General retail | 7 | 6 | 150 |
| **Institutions** | **17** | **17** | **392** |
| Care homes & hospitals | 6 | 5 | 135 |
| Pre & primary education | 7 | 11 | 150 |
| Other education | 2 | 1 | 48 |
| Defence / justice | 1 | <0.5 | 32 |
| Other institutions | 1 | <0.5 | 27 |

| Survey group | Unweighted column % | Weighted column % | Number of interviews |
|---|---|---|---|
| Loose non-prepacked only | 78 | 82 | 1,793 |
| Any PPDS | 22 | 18 | 510 |
| Chain | 34 | 33 | 784 |
| Not a chain | 66 | 67 | 1,519 |

## Market trader interviews

Market traders, including food stalls and vans, were an important group to cover in this research due to their likelihood of selling non-prepacked, mixed ingredients foods to consumers.  However, the lack of reliable population data for this group presented challenges in terms of integrating their data with other FBOs. For this reason, as well as other methodological reasons outlined below, market traders were interviewed separately from the rest of the FBO population.

To ensure a spread of different types of markets, 5 different survey areas were targeted for interviews. These included the three devolved nations (Wales, Scotland and Northern Ireland), while England was split between London and another English region. In total interviews covered 10 different markets within these broader survey areas, as shown in Table 3.

**Table 3: Markets covered in the market trader interviews**

| Survey region | Market |
|---|---|
| London | Walthamstow Market |
| London | Lloyd Park Market |
| London | Monument Market |
| England - other | Macclesfield Treacle Market |
| Northern Ireland | St George's Market, Belfast |
| Scotland | Edinburgh Farmers' Market |
| Scotland | Grassmarket, Edinburgh |
| Scotland | Leith Farmers' Market |
| Wales | Cardiff Central Market |
| Wales | Swansea Indoor Market |

To overcome challenges around reaching a particularly mobile respondent group, this element of the survey required a discrete face-to-face recruitment exercise before telephone interviewing could begin. Initially, local authorities were contacted to scope out suitable markets for the research and to obtain appropriate permissions to visit the markets for research purposes (in some cases these permissions were obtained by other contacts such as market inspectors).

Researchers from IFF Research then visited the selected markets, where they provided market traders with information about the research and invited them to complete the main survey over the telephone at a time convenient to them. In line with the main survey, stalls selling fresh fruit and vegetables were excluded from the survey on the basis that the types of allergen-containing non-prepacked foods were considered to be predominantly single-ingredient food items.

Interviews were conducted using CATI between February and March 2020. A breakdown of these interviews by survey area is shown in Table 4.[16] The questionnaire used for this element of fieldwork was the same as that used for the main element of fieldwork with a few minor wording amends to ensure suitability for the respondent group.

**Table 4: Profile of completed market trader interviews**

| Country / area | Market Stall | Van | **Total** |
|---|---|---|---|
| London | 17 | 1 | **18** |
| England – other | 20 | 0 | **20** |
| Northern Ireland | 7 | 0 | **7** |
| Scotland | 5 | 1 | **6** |
| Wales | 4 | 0 | **4** |
| **Total** | **53** | **2** | **55** |

Survey results relating to the market stalls and mobile food vans can be found in a separate chapter in the report. These findings were not weighted due to the lack of available population information and therefore no direct comparisons have been made to the main weighted survey findings.

[16] Note, due to inclement weather conditions, only 9 market traders were recruited in Scotland, compared with around 20 or more in all other areas. Interviews with market traders in Wales were terminated early due to the Covid-19 outbreak.

## Qualitative follow-up interviews

**Methodological overview**

This final phase of the study comprised 21 qualitative follow-up interviews with FBOs and market traders. These interviews were designed to explore, in greater depth, some of the issues captured in the quantitative survey as well as providing an opportunity to ask questions that would require more extensive probing than was possible in the survey.

Respondents were drawn from a pool of those who had taken part in the quantitative survey and who had indicated willingness to take part in a follow-up interview. They were sampled based on their firmographics (i.e. country, size and sector) in order to meet the aims of speaking to a diverse group of food businesses. In addition, to ensure the topics covered were relevant, responses from the quantitative survey were incorporated into the sample selection.

The follow-up interviews focused on 4 main topic areas:

- **Precautionary (i.e. 'may contain') labelling**: this section explored the reasons why business use or do not use precautionary labelling and what processes businesses follow when adding precautionary labelling to their products. This section also included a sub-question regarding the use of waivers and disclaimers.
- **Current labelling practices and preparedness for the upcoming PPDS amendment**: this section explored current labelling practices for PPDS foods; businesses' motivations for using their chosen methods of labelling; perceptions of the 2021 food information amendment for PPDS foods; and the support businesses need to help them comply with the new PPDS legislative amendments.
- **Training on food allergens**: this section explored the types of allergen training provided to staff; reasons for not training staff among businesses that had not provided training; challenges faced by businesses in keeping staff trained; areas of current food allergen regulations businesses are less confident about; and how business' processes could be improved in relation to allergen control and the provision of allergen information to consumers.
- **Motivations for complying with food allergen legislation**. This section explored what motivates businesses to comply with legislation and what they think the consequences would be if they did not comply.

**Fieldwork and profile of interviews**

Follow-up interviews took place in September and October 2020 and each lasted between 30 and 45 minutes. All interviews were conducted via telephone although participants were offered the opportunity to conduct interviews via Microsoft Teams.

The final profile of interviews achieved is shown in Table 5.

**Table 5: Profile of qualitative follow-up interviews**

| Survey group | Interviews achieved |
|---|---|
| England | 13 |
| Northern Ireland | 2 |
| Scotland | 3 |
| Wales | 3 |
| 1 to 4 | 6 |
| 5 to 10 | 6 |
| 11+ | 9 |
| Catering | 10 |
| Retailers | 5 |
| Institutions | 4 |
| Market traders | 2 |
| Any PPDS foods sold | 14 |
| No PPDS foods sold | 7 |
| Currently label some / no ingredients on PPDS foods | 4 |
| Expect it to be difficult to comply with the PPDS amendment | 2 |
| Received formal training on allergens | 16 |
| Use precautionary labelling | 12 |

## Reporting conventions

The report is primarily based on findings from the FBO quantitative survey, with findings from the market trader survey reported in a standalone chapter. Findings from the FBO survey are compared to the baseline survey results from 2012.

All subgroup differences reported in the commentary are statistically significant at the 95% confidence level unless otherwise stated (this is where we can be 95% confident that the results did not come about by chance). In tables and charts, an asterisk (*) denotes a statistically significant difference to the mean of all other groups in the category.

For example, in Figure 1 in 'The provision of allergen information' chapter, an asterisk appears alongside the charted result showing that 79% of firms in Wales had a written policy to indicate that it differs significantly from the average from other categories in this group (i.e. England, Scotland and Northern Ireland combined). Sub-group analyses throughout the report include:

- Country (England, Scotland, Wales, Northern Ireland).
- Business size in relation to staff numbers (1-4; 5-10; 11+).
- Business sector - differentiated as catering, retailers and institutions
    - Catering includes: restaurants and cafes; pubs and bars; contract caterers; hotels and restaurants, and leisure and entertainment establishments.
    - Retailers include: butchers, bakers, fishmongers, delicatessens and general retailers.
    - Institutions include: care homes, hospitals, education establishments, defence and justice establishments, and other large employers.
- Food types sold or served: Loose non-prepacked only, PPDS only, both loose non-prepacked and PPDS, any non-prepacked; and any PPDS.
- Whether the business is a chain i.e. one of a number of food retailers under the same ownership, or an independent business.

Throughout the report, bivariate analyses have been used to look at how reported behaviours differ according to business sector, size, country and whether the business is part of a chain. Such analysis allows a large number of cross-tables to be produced, and displays differences in a clear manner, easily understood by readers.

A drawback of bivariate analysis, however, is that other factors that may be the underlying cause of the differences seen between two groups cannot be controlled for. For example, there is a relationship between food business sector and size. While 45% of all sampled food businesses employed 11 or more employees; much lower proportions of butchers (7%), fishmongers (11%) delicatessens (19%) and contract caterers (20%) had done so, in contrast with much higher proportions of institutions (81%) and hotels (70%). Similarly, there is a relationship between sector and whether sites were independent or part of a chain of food businesses; so while a third (33%) of all sampled FBOs were part of a chain, this rises to 67% amongst general retailers. Conversely, 86% of delicatessens, 85% of butchers and 73% of restaurants and cafes were independent compared to two thirds (67%) overall. It is possible, therefore, that some apparent sectoral differences are attributable to differences in their size or whether part of a larger organisation.

Although there is a separate chapter showing results from the market trader survey, findings from the qualitative follow-up interviews with market traders are included alongside those of the other qualitative interviews throughout the report. This is due to only a very small number (two) of market trader interviews being completed in this phase of the study, which was insufficient to draw out patterns or themes unique to this subgroup of food businesses.

A final point to be noted is that survey interviews do not capture businesses' actual behaviour. What respondents say they do is *reported* behaviour. This should be borne in mind when reading the report.

The rest of this report presents the key research findings, covering the provision of allergen information; business processes and staff training, reflections on the 2014 food information regulations; and awareness and perceptions of the 2021 food information amendment.

# The provision of allergen information

**Food allergen information policies**

- The majority (95%) of food business operators (FBOs) had a policy on allergen labelling, a large increase on 2012 levels (60%). The proportion with a written policy has doubled from 41% to 83%.

**Provision of information on the 14 main allergens**

- All FBOs surveyed sold food containing one of the 14 main allergens. The three most common were gluten (97%), milk (94%) and eggs (92%).
- Nearly all FBOs (99%) provided written or verbal information on at least one of the 14 main allergens in the foods they sell and close to nine in ten (88%) on all the allergens in the food they sell.

**Methods used to provide information on food allergens**

- Nearly every FBO surveyed (99.8%) used at least one method to provide information on food allergens to consumers.
- FBOs typically used a variety of different methods, with 95% using both written and verbal methods (up from 64% in 2012), two per cent using only written methods and three per cent using only verbal methods (down from 22% in 2012).

**Precautionary labelling and 'free from' labelling**

- More than half (55%) of FBOs used precautionary labelling, such as 'may contain' labelling, and close to three in ten (31%) used 'free from' labelling.
- Follow-up interviews found that ensuring customer safety and protecting the business (in terms of reducing liability) were equally important drivers behind the use of precautionary labelling.

**Checking for allergenic ingredients**

- Almost all FBOs (99.9%) had processes in place to check if a product contains allergenic ingredients if asked by consumers. In 2012, eight per cent either did not have a process or were unsure.
- Close to nine in ten FBOs (86%) check or audit the ingredients they obtain from suppliers and wholesalers (71% in 2012): 66% always and 20% sometimes.

This chapter presents findings on the prevalence and the type of information about allergenic ingredients currently provided to consumers by food business operators (FBOs). Specifically, FBOs that sell or serve foods with multiple ingredients that are non-prepacked, and in particular, prepacked for direct sale (PPDS).

The chapter begins by examining how widespread allergen information policies are. The chapter then moves on to explore the range of allergens present in the food sold or served by FBOs and the methods used to communicate allergen information to consumers. The chapter ends with a review of how FBOs check for allergenic ingredients and how this information is recorded.

## Food allergen information policies

The majority of FBOs (95%) had a policy on allergen labelling in place: 83% a written policy and 12% an informal policy.[17] This signifies a sharp uptake in the proportion of businesses that had an allergen labelling policy (up from 60% in 2012). Particularly the proportion that had a written policy, which has doubled since the baseline study (83%, compared to 41%).

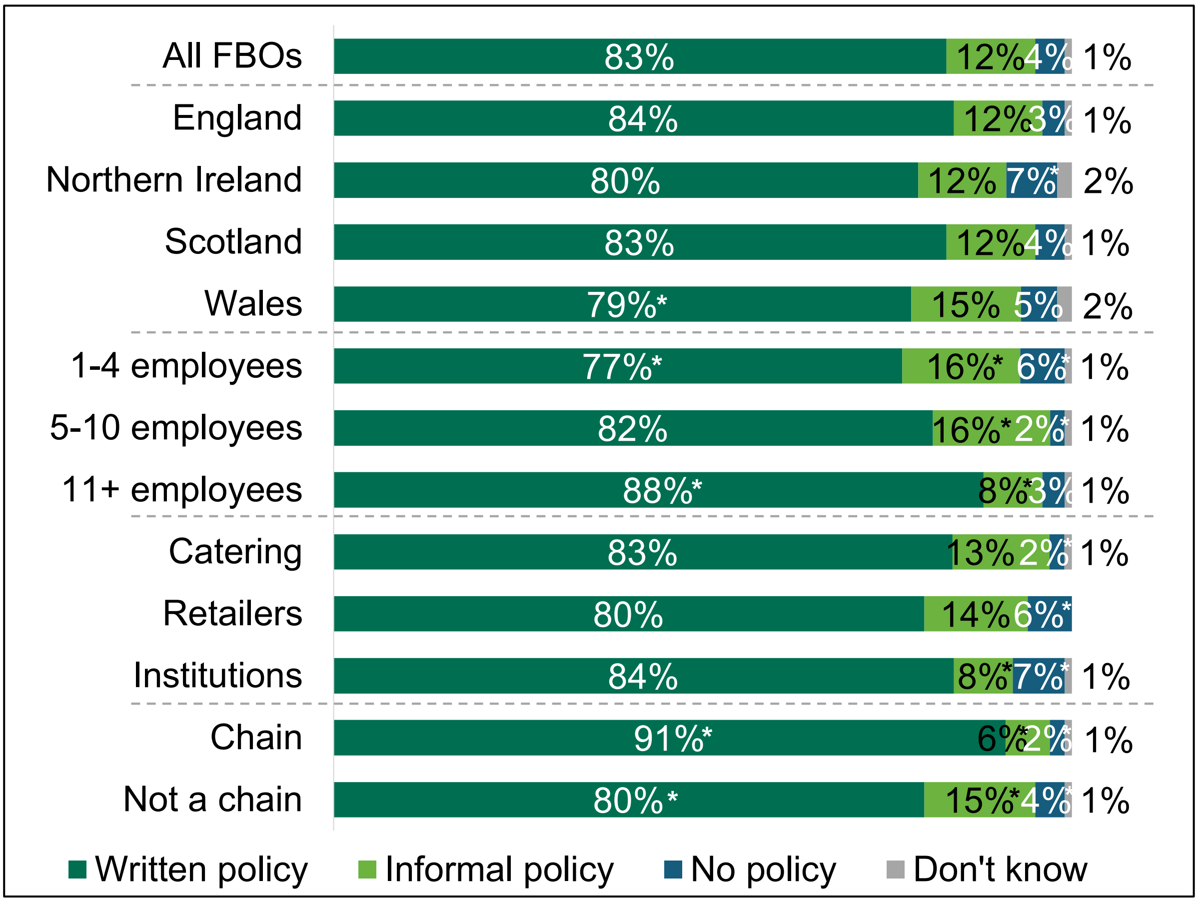
While allergen labelling policies were found to be commonplace, there were still around one in eight FBOs (12%) that did not have a written policy and four per cent that did not have any form of allergen labelling policy.

As presented in Figure 1, an informal allergen labelling policy was more common amongst FBOs with fewer than 10 employees (16%) and those that were not part of a chain (15%). Delicatessens (20%) and cafes (18%) were also more likely to have an informal allergen labelling policy.

With regards to not having any form of allergen labelling policy in place, this was more likely amongst FBOs with fewer than five employees (6%), retailers (6%), institutions (7%) and FBOs in Northern Ireland (7%). Delicatessens (11%), pre-primary and primary school educational institutions (9%), leisure and entertainment businesses (9%) and general retail businesses (7%) were particularly more likely to not have any form of allergen labelling policy in place. Table B.1 in Appendix B presents allergen labelling policy status by specific sector.

[17] The survey question asked, 'do you have a written or informal policy on allergen labelling within your business?', with an additional optional prompt explaining that 'a policy is a guideline or procedure for staff to follow'. Respondents could choose between having a 'written' or 'informal' policy or not having a policy in place at all.

**Figure 1: Allergen labelling policy status**




Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

FBOs that had an allergen labelling policy in place - either written or informal - had typically designed this policy internally (77%). The staff member most commonly responsible for designing them was the owner or manager of the site (59%), followed by the head chef (13%).

Around a quarter of FBOs (23%) that had a policy said that that it had been designed externally. Unsurprisingly, this was more common among those with a written policy (26% vs. 6% of those with an informal policy). For around a fifth (18%) this had been designed by their head office, and for a few it had been designed by a local authority or external consultancy (both 2%). One per cent of FBOs were unsure who was responsible for designing their policy, though were aware that they had one in place.

As to be expected, the party responsible for designing the allergen labelling policies of FBOs was heavily influenced by business / ownership structure. Those that were part of a chain were more likely to have a policy that had been designed externally (56%), with half (50%) of these businesses having a policy designed by their head office. By contrast, independent FBOs were more likely to have an internally designed policy (90%). For three quarters (74%) of these businesses, a policy had been designed by the owner or manager of the establishment.

Reflecting these differences, FBOs in the catering sector were more likely to have a policy that had been designed internally (78%) and retailers were more like to have one that had been designed externally (44%). Within the catering sector, caterers (86%) and cafes (82%) were particularly likely to have a policy that had been designed internally. Within the retail sector, general retail businesses (70%) and bakers (42%) were more likely to have an externally designed policy.

Among those that had an allergen labelling policy that was designed externally, most (69%) had at least some input into its implementation: 18% managed the policy without any input from external parties, a further 21% managed it with some input and 30% managed it with a lot of input. For 29% the policy was managed solely by an external party.

Amongst the small minority of FBOs that did not have any food allergen labelling policy in place (4% overall), the most common reasons given for not having one were because they rely on customers to inform them of their allergies (18%), because it was felt that a policy would not be relevant to the business (15%), and because responsibility for allergen labelling was perceived to lie with suppliers (13%). Some (12%) felt that a policy was not required because they ask customers about their allergies before serving foods and alert them to the presence of allergenic ingredients. Base sizes are too small to provide disaggregation of these reasons by FBO type.

## Provision of information on the 14 main allergens

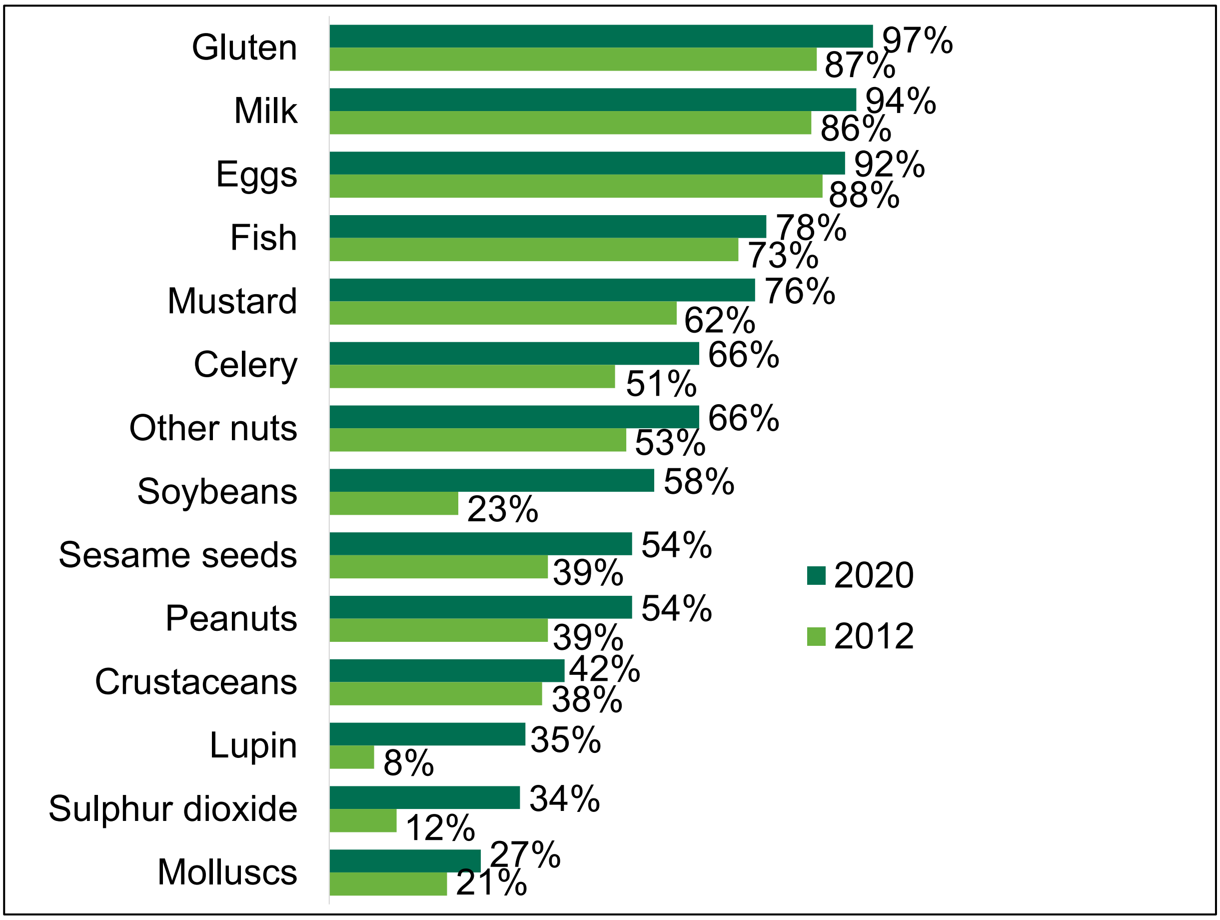
In 2014 it became mandatory for FBOs to inform consumers if any of 14 key allergens have been used in the preparation of non-prepacked foods.[18] One of the key objectives of the research conducted in 2020 was to ascertain how the provision of information about these 14 allergens has changed since the baseline study of 2012. To achieve this, the same approach that was used in 2012 was followed; first exploring the presence of the 14 allergens in the food sold by FBOs and then exploring whether they provide information to consumers for each allergen.

Every FBO that took part in the survey in 2020 sold food containing one of the 14 main allergens. Typically, FBOs used at least half of the 14 allergens in the preparation of the foods they sell (73%): 30% used between seven and nine, 36% used between 10 and 13 and seven per cent used all 14. As shown in Figure 2, the three most common were gluten (97%), milk (94%) and eggs (92%).

Across all the 14 allergens there has been a reported increase since 2012 in the proportion of businesses selling food that contain them, with considerable increases for soybeans (58%, compared to 23% in 2012), Lupin (35% vs 8%) and Sulphur Dioxide (34% vs 12%). The increase in the proportion of businesses reporting that they sell food containing each of the 14 allergens is likely to be a by-product of increased focus on the provision of allergenic information since the Food Information to Consumers Regulation (FIC) came into effect in 2014.

[18] These allergens are peanuts, tree nuts, milk, soya, mustard, lupin, eggs, fish, molluscs, crustaceans, cereals containing gluten, sesame seeds, celery and sulphur dioxide (at levels above 10mg/kg, or 10 mg/litre).

**Figure 2: Allergens in any food sold or served**



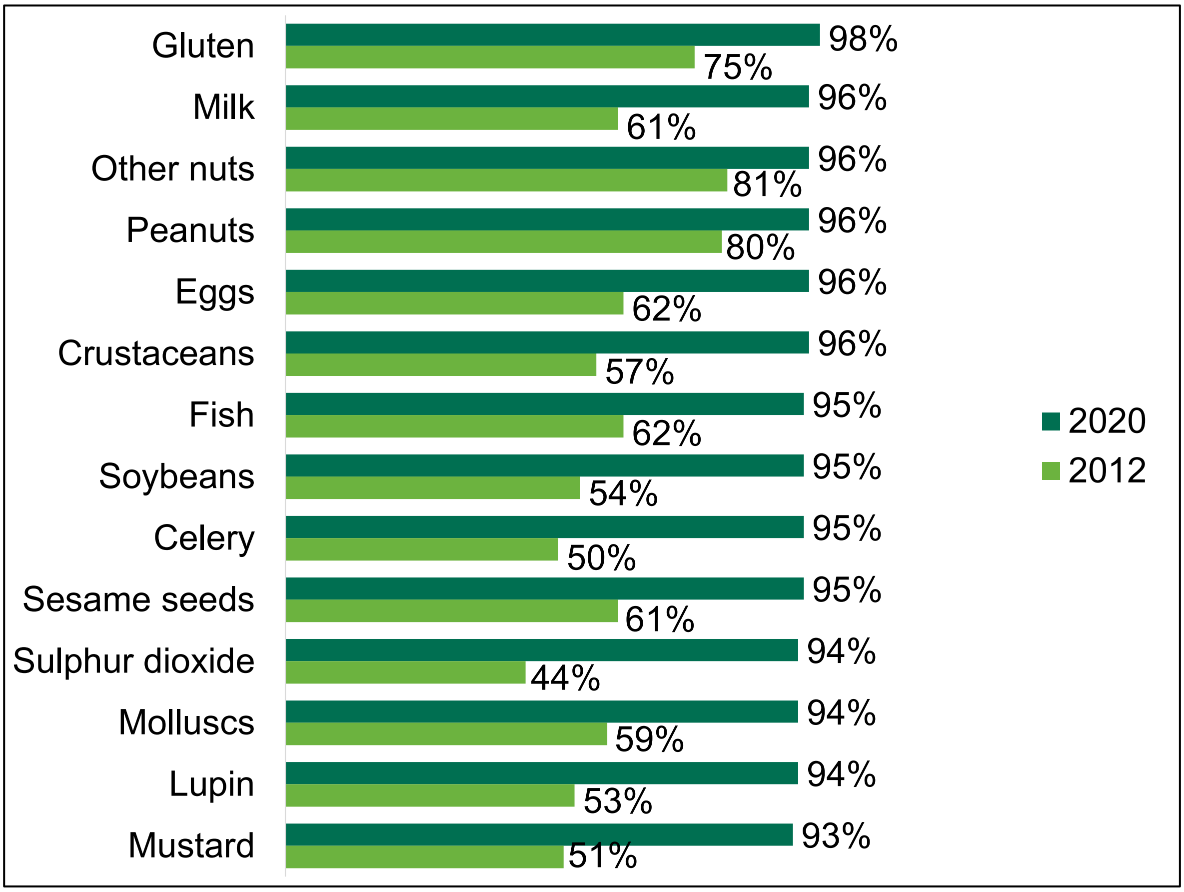

Base: All FBOs (2020: 2,303, 2012: 1,666).

Unsurprisingly, the specific allergens present in the food sold by FBOs was heavily influenced by sector. For example, fishmongers were more likely to sell fish (96%), crustaceans (100%) and molluscs (100%) and pubs and bars were more likely to sell or serve products containing Sulphur Dioxide (51%), which is known to be an ingredient of some wines.

Furthermore, there was considerable difference between sectors in terms of the number of the 14 allergens used. FBOs in the catering sector were likely to use more of the 14 allergens than those in other sectors; over half (51%) used between 10 and 14 compared to 32% of retailers and 17% of institutions. Within the catering sector, restaurants used a particularly high number of the 14 allergens, with 60% using more than 10.

For each of the 14 allergens the vast majority of FBOs that sell food containing them provide written or verbal information about them to consumers. As presented in Figure 3, the proportion ranged from 93% for mustard, and 94% for sulphur dioxide and molluscs, to 98% for gluten.

**Figure 3: Whether information about each of the 14 allergens in food sold is provided to consumers**




Base: FBOs that sold or served food containing each allergen. See Table A.2 in Appendix A for base sizes.

This marks a substantial change since 2012 where there was considerable variation in the proportion of FBOs that provided written or verbal information on each of the 14 allergens in their food products. In 2012, the proportion ranged from four-fifths for peanuts (80%) and other nuts (81%) to around half or less for mustard (51%), celery (50%) and sulphur dioxide (44%). Comparing 2020 results with 2012, there was a significant increase in the proportion of FBOs providing information for each allergen served or sold. This suggests that the introduction of the FIC in 2014 has had a significant effect on the behaviour of FBOs in terms of the provision of information about the 14 main allergens.

Nearly all FBOs (99%) provided written or verbal information on *at least one* of the 14 main allergens in the foods they sell. When looked at collectively, close to nine in ten (88%) provided written or verbal information on *all* the 14 allergens in the foods they sell. This means that one percent of FBOs do not provide information on any of the 14 main allergens that are in their food and around one in ten (11%) provide information on some, but not all.

It was more common for FBOs without an allergen labelling policy to not provide written or verbal information on all the 14 main allergens in the foods they sell. Overall, 61% of those without a policy provided information on all the 14 allergens in their foods, compared to 90% with a written allergen labelling policy and 84% with an informal policy.

Smaller FBOs with 1 to 4 employees (15%), hotels (16%), and those in general retail (17%) were most likely to not provide written or verbal information on all the 14 main allergens in the foods they sell.

## Methods used to provide information on food allergens

In scoping interviews, stakeholders suggested that FBOs communicate allergy information to consumers using three key methods: labelling on products; providing information verbally; or referring to information stored separately from products (e.g. allergen information sheets or booklets, which could be relayed verbally or shared physically with customers). Stakeholders reported that FBOs typically use a combination of these methods, with the mix used influenced by the types of food products they produce and the channels through which they sell them.

Stakeholders generally felt that written information was an effective method of communicating allergenic information, however some identified risks. In particular, there were concerns about inaccurate labelling, due to FBOs lacking technical knowledge about allergens, inconsistent practices in supply chains, and mistakes being made in production or with packaging.

Some stakeholders felt that verbal communication was the most effective method of conveying allergenic information to consumers. This is because verbal communication reduces the risk of providing out-of-date information, which can be an issue with written labels and documentation.

> "Nothing replaces verbal communication. This is because verbal communication is live. It can be good to have written information, but this information can become outdated. For example, if someone decided to change the ingredients one day, adding mustard to a sandwich."
>
> **Consumer representative**

Furthermore, some stakeholders said that verbal communication helped businesses to understand the specific needs of consumers. However, it was stressed that the effectiveness of verbal communication is highly dependent on the level of knowledge amongst staff.

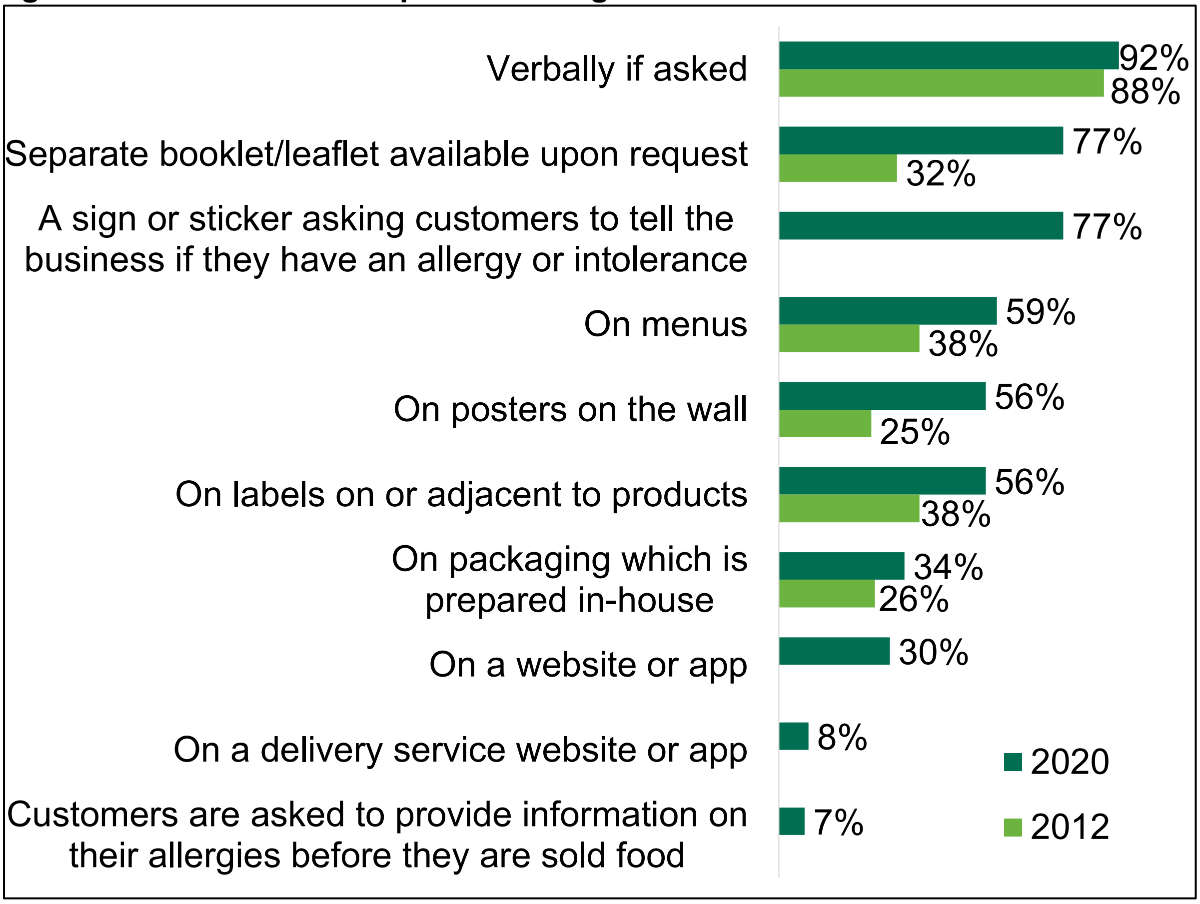
Verbal communication does however carry its own risks. For instance, in a follow-up qualitative study to the 2012 survey, there were concerns among food businesses about staff having the necessary knowledge and capabilities to effectively communicate this information to consumers.[19]

Survey results found an increase in the proportion of FBOs that communicate allergenic information to consumers, rising from 93% to 99.8%. Reinforcing the stakeholder observations on multiple methods being used to communicate information on food allergens, there was an increase in the proportion that use both written and verbal methods (95%, compared to 64% in 2012). The proportion that use only written methods (2% vs 6%) decreased slightly, while there has been a substantial decrease in the proportion that use only verbal methods (3% vs 22%). The vast majority of FBOs within each sector used a combination of written and verbal methods, with this particularly common among takeaway restaurants (99%). Hotels (90%) were slightly less likely to provide allergenic information via a combination of verbal and written methods; the remaining 10% of hotels only used verbal methods. Pre-primary and primary schools were also more likely to only use verbal methods than other FBOs (3%). Businesses that only sold PPDS foods were more likely than those that sold any loose non-prepacked foods to only use written methods (12% vs. 2%).

As presented in Figure 4, the most common specific methods used to provide information on food allergens were verbal communication (92%), booklets or leaflets available on request (77%) and signs or stickers asking customers to talk to staff (77%). Table B.2 in Appendix B presents the use of these methods by sector which, as one would expect given the different contexts and environments businesses in each sector operate in, varied considerably.

[19] IFF Research and Deborah Smeaton (2014), p.26.

**Figure 4: Methods used to provide allergen information to consumers**




Base: All FBOs (2020: 2,303, 2012: 1,666). "A sign or sticker asking customers to tell the business if they have an allergy or intolerance" and "A delivery website or app" were not included as pre-coded options in the 2012 study.

The very small minority of FBOs that reported that they did not provide information on allergens through either written or verbal methods during the survey typically said that this was because they do not think it is necessary because of the types of products they sell, or because of the types of consumers they serve. For example, an educational institution said that they collect allergen information from students at the start of term and adapt the meals prepared for their students accordingly. Meanwhile, a butcher said that they do not need to provide information about allergens because the ingredients in their food were self-evident.

## Precautionary labelling and 'free from' labelling

Precautionary allergen labelling is used to warn consumers if there is a risk of a food product being affected by allergen cross-contamination. Providing this information is voluntary and should only be used after a thorough risk assessment, if the risk of allergen cross-contamination is real and cannot be removed. Free-from labelling is also voluntary, and is used to state to consumers whether a product is free from particular allergens; it must be based on specific and rigorous controls, such as checking that all ingredients and packing materials do not contain the stated allergen and that cross-contamination from other foods made on site is prevented. Gluten-free labels can be used for foods that contain a maximum of 20mg/kg of gluten.[20]

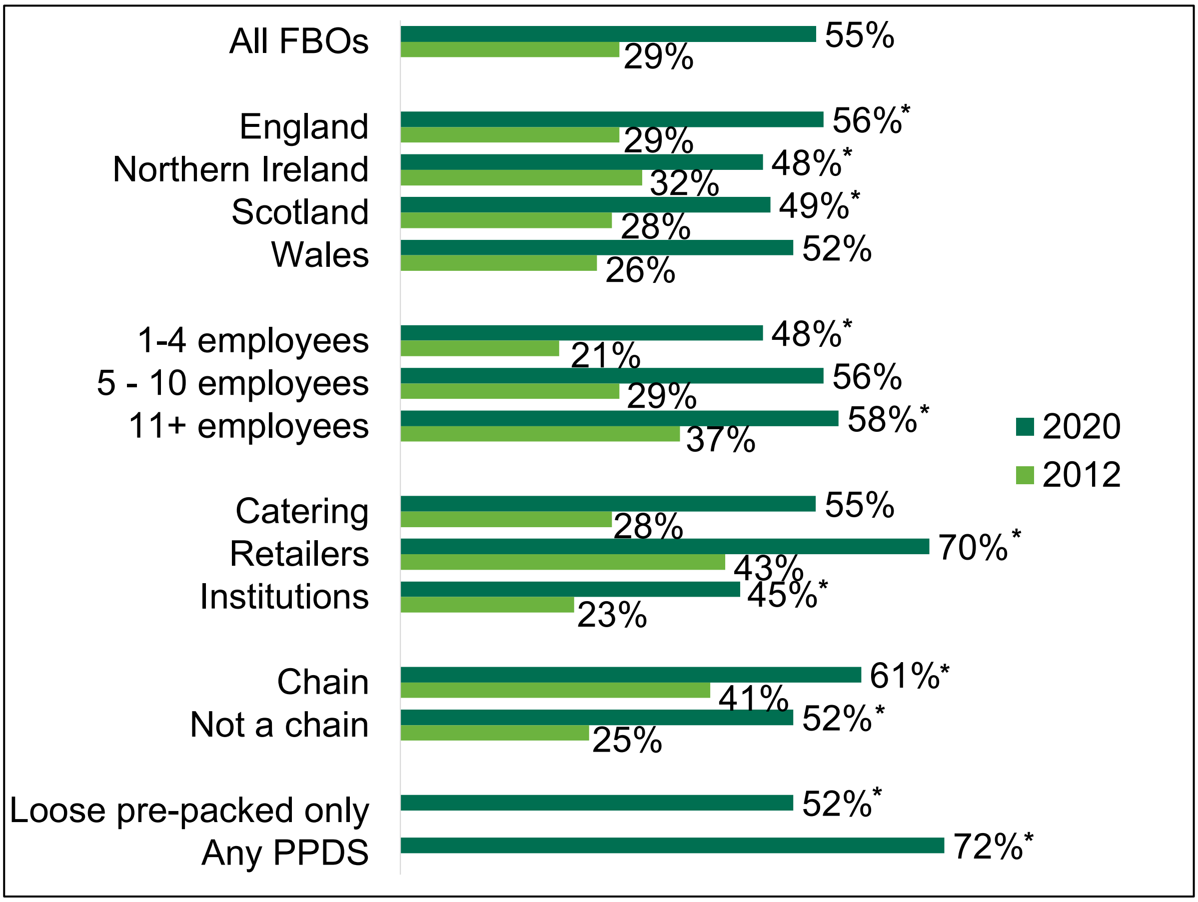
More than half (55%) of FBOs said that they use precautionary labelling, such as 'may contain' labelling.[21] This is almost double the proportion of FBOs that said they used 'may contain' labelling in 2012 (29%).

As Figure 5 illustrates, there was considerable difference between different types of FBOs in the likelihood to use precautionary labelling. In terms of business size, larger FBOs were more likely to use precautionary labelling: 58% of those with 11 or more employees compared to 48% of those with one to four employees. With regards to sector, retailers were more likely to use precautionary labelling (70%), particularly general retail businesses (78%) and bakers (72%). Table B.3 in Appendix B presents the use of precautionary labelling by specific sector.

[20] More information can be found on the FSA's Allergen labelling for food manufacturers guidance webpage.

[21] In the 2012 survey FBOs were asked specifically whether they used 'may contain' labelling. In the 2020 survey FBOs were asked about whether they used precautionary labelling, such as 'may contain' labelling. This change was made to cover variations in the wording of precautionary labelling.

**Figure 5: The use of precautionary labelling (e.g. 'may contain')**




Base: All FBOs (2020: 2,303, 2012: 1,666). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

The type of food sold by an FBO also had a bearing on the use of precautionary labelling. Around three-quarters (72%) of FBOs that sell PPDS foods used it, and this rose to 78% among those that only sell PPDS foods. FBOs that only sell loose non-prepacked food were less likely to use precautionary labelling (52%).

Follow-up interviews explored why FBOs and market traders used precautionary labels on their foods. Some were influenced primarily by a desire to protect the customer and felt that by providing this information they were helping customers make an informed decision about whether foods were safe to consume. However, in other cases, businesses primarily spoke about protecting their business, believing that precautionary labelling would remove the business' liability in the event that a customer fell ill after eating one of their products. In most cases it was a combination of both of these reasons.

> “[Precautionary labelling] gives the confidence to the customer and the confidence to us that if a customer is buying [a product] then they take the liability into their own hands."

**General Retail, 11+ employees**

Less commonly, the known risk of cross-contamination on their premises was the main driver for using ‘may contain’ labelling on their products.

> “The premises may have traces of sesame seeds in the kitchens so it’s sort of a backup… so we do use products that may contain traces of it and making sure we provide as much information we can for the customer.”

**Butcher, 5-10 employees**

There were few perceived drawbacks of using precautionary labelling as most perceived precautionary labelling to be useful to customers. However, one business mentioned ensuring that labelling was updated each time a menu changed could be ‘a hassle’ for food businesses. A few also had concerns from a consumer perspective; for instance, one business felt that some precautionary labelling was too generic or ambiguous and left customers uncertain about what they could consume. Another business felt that precautionary labelling might be perceived negatively by the public because it restricted their options.

> “It is easier to tell someone what they can have than what they can't have… there's nothing worse than someone coming in and being told 'all these things you can't have.”

**Pub / Bar, 5-10 employees**

Among businesses that had not used it, the key reasons for not doing so included it not being mandatory in legislation or company policy to use them, or because they had never been told to (for example, one school mentioned they would have been given the labels by local authorities if they were required to use them). A few businesses were confident that there was no risk of cross-contamination in their products because they have a limited menu. In addition, one business was content with providing this information verbally.

> "There is nothing to get caught out by really … It is a very simple menu".

**Pub / Bar, 5-10 employees**

> "It's face-to-face so I always ask customers if they have any allergies and just let them know they it has been prepared in the same kitchen as stuff is stored, but there are [no allergens] that have been put in it."

**Market Trader, 1-4 employees**

The follow-up interviews also revealed that a few businesses had misapprehensions about precautionary labelling. For instance, one business believed precautionary labelling was mandatory and that not using it might lead to punishment. In another case, the business felt may contain labels were not required because they labelled all ingredients, perhaps indicating a lack of understanding that the purpose of may contain labelling is to communicate the risk of cross-contamination.

> "I think we'd be in trouble. I think we could be prosecuted. It wouldn't be very good publicity. I think they could prosecute and I think there could be a really big fine and [we'd] possibly be closed down."

**General Retail, 11+ employees**

The methods used by businesses to provide precautionary labelling varied, both in terms of the wording and the allergens specified. In some cases, businesses referred to a specific list of allergens, whereas others used general warnings that said products may contain allergens but did not specify which ones. The labels also varied in terms of whether they specified the source of the risk; for instance, some just had a general 'may contain' warning whereas others detailed that a product was made in a production area where there was a cross-contamination risk.

A few businesses indicated that their labelling focused on particular allergens that they perceived to be the most common or most dangerous. One business, for example, mentioned including 'may contain nuts' on all of their precautionary labelling, even in cases where there was no known risk of cross-contamination.

Some labels included an instruction to customers to speak to a member of staff if they would like to find out more information. Where the label was displayed also varied between businesses; these could be located on product packaging, menus, shelves, or on wall posters.

Among businesses that used precautionary labelling on their products, assessing the risk of cross-contamination was typically done externally, with many using labels provided by their head office or suppliers. Some also printed the labels themselves after checking supplier ingredients. Some of these businesses mentioned checking with the supplier that no substitute items had been delivered (and would reject them if they had), checking for mislabelled or unlabelled items, checking the products against ingredients lists provided by the supplier and only buying products from reputable brands as ways of ensuring that the labels are correct. These checks tended to be carried out routinely, each time businesses received products from their head office or suppliers. Others did not mention having any checks in place, instead relying on the labelling already on the products.

> "I don't get involved, I make the coffee. Everything else, from muffins, to tarts, to sandwiches, stuff like that, is all bought from mainstream suppliers and has its information taken care of."
>
> **Caterer, 1-4 employees**

In-house analytical testing to establish cross-contamination risks was rare. One business performed swab testing to confirm there was no risk of cross-contamination internally. Once internal risk had been ruled out, they relayed any cross-contamination risks flagged by suppliers in their own product labels.

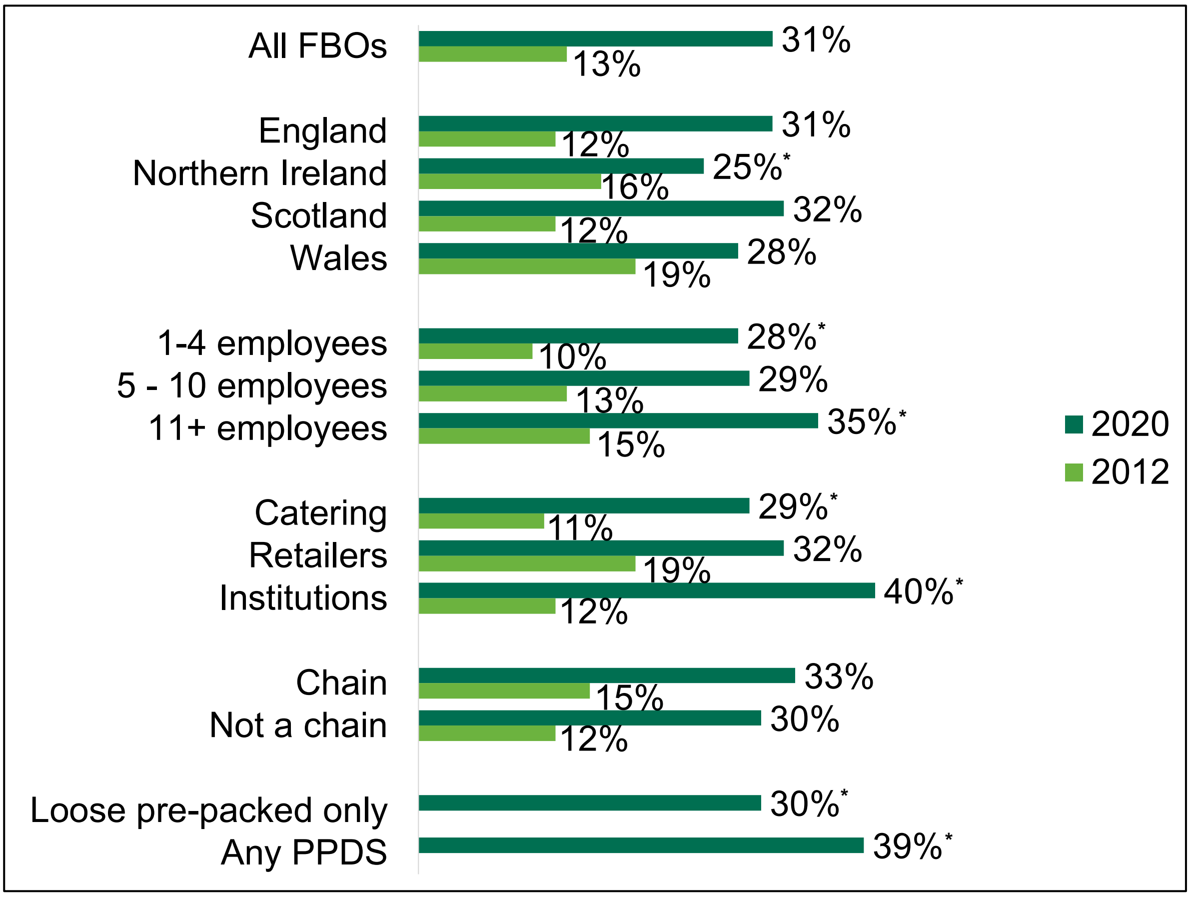
> "I always declare the 'may contain' based on our suppliers declaring this. I don't from our end because we test allergens periodically and do swabs to understand cross-contamination of allergens."
>
> **Caterer, 11+ employees**

There were slight differences in attitudes and use of precautionary labelling among institutions, compared to other sectors. This is likely due to the different type of customers they deal with, where there is a duty of care and therefore an additional sense of responsibility (for example a school providing food to children or a care home providing food to its residents). These establishments often relied on allergens charts and full ingredients lists displayed in kitchens. One school mentioned that students' allergies were communicated to catering staff electronically via their till system, so that the catering staff could check cross-contamination risks accordingly and discuss this with students.

Close to three in ten (31%) of FBOs used 'free from' labelling, again a considerable increase since 2012 (13%). As with precautionary labelling, 'free from' labelling was more likely to be used by larger FBOs (one to four employees: 28% and 11+ employees: 35%) and general retail businesses (39%).

However, unlike precautionary labelling, 'free from' labels were more likely to be used by institutions (40%), especially pre-primary and primary school educational institutions (45%). Table B.3 in Appendix B also presents the use of 'free from' labelling by specific sector.

**Figure 6: The use of 'free from' labelling**




Base: All FBOs (2020: 2,303, 2012: 1,666). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

During scoping interviews many stakeholders identified 'may contain' and 'free-from' labelling as problem areas. It was felt that such labelling was inconsistently applied to food products and not necessarily based on thresholds or risk assessments. As precautionary allergen labelling such as 'may contain' is not mandatory, it was felt by some that it would be clearer not to have it at all.

> "Both 'may contain' and 'free from' aren't fully regulated… we have been pushing the government to do some sort of development of these policies, because now they get connected with other terms, like vegan – it becomes a bit of a minefield. I think showing differences between things that are all unregulated and without parameters is very difficult, and it's not helping with the ultimate goal of getting consistency for consumers."
>
> **Industry representative**

### Waivers and disclaimers

Participants in the follow-up interviews were asked about their awareness and opinions of waivers and disclaimers, which a food business might ask customers to sign in the belief that this would stop the business from being liable if a customer suffered an allergic reaction.

The majority of participants were not aware of businesses partaking in this practice. One respondent had come across this before, when working for a business selling sandwiches, where customers were asked to sign waivers following an allergens-related incident. A bar/restaurant had also done this on one occasion where a customer with a nut allergy wanted to consume a product despite being warned it could contain traces of nuts. In both of these cases, the customers were reported to be happy to sign the waiver.

> "I understand some people can be confrontational in that situation but I find that if people are willing to do something (eat food after being advised of the allergens) and you are willing to explain in a way that they (the consumer) understand then it is never a problem."

**Pub / Bar, 5-10 employees**

Businesses were generally sympathetic regarding the reasons why businesses might request customers to sign waivers or disclaimers, particularly in cases where a customer with an allergy knowingly chooses to eat a product containing that allergen. However, some felt that waivers or disclaimers should not be necessary if businesses have the correct controls and processes in place and a suitable level of knowledge about their supply chain; in some cases, they felt it was shirking responsibility. These particular respondents were more likely to say that customers would react negatively to such requests, and possibly take their custom elsewhere.

> "Passing the buck, as far as I can see. Everybody should know what they are selling and what's in their food, they shouldn't need to ask anyone to sign a waiver I wouldn't have thought."

**School, 11+ employees**

> "It's hardly how you want to start your experience in a place - hand them their menus and then 'please can you sign this'. I imagine there would be bewilderment. It would just add another layer of complexity in explaining why they need to do that."

**Pub / Bar, 5-10 employees**

Businesses suggested that better signage and labelling of products (whether this is full ingredients labelling or precautionary labelling), communication with customers and staff knowledge would minimise the use of waivers and disclaimers.

## Checking for allergenic ingredients

### Methods used to check ingredients

Nearly all FBOs (99.9%) had processes in place to check if food products contain allergenic ingredients if asked by consumers. Again, this is a change since 2012, when eight per cent of FBOs said that they didn't have a process in place or didn't know what the process was.

As presented in Figure 7, the most common way FBOs checked for allergenic ingredients was to refer to a handbook or allergenic information sheet (62%). Other prominent methods included checking ingredient packaging (33%) and asking the head chef (25%).

**Figure 7: Methods used to check for the presence of allergens**


Base: All FBOs (2020: 2,303).

There was considerable variation between different types of FBOs in the methods used to check for allergenic ingredients. In terms of business size, larger FBOs with 11 or more employees were more likely to use handbooks or information sheets (65%). Meanwhile, smaller FBOs with one to four employees were more likely to check packaging and labels (37%) and retain ingredient information for the products used (19%).

A similar pattern is present between FBOs that are part of a chain and those that are not. FBOs that formed part of a chain were more likely to use handbooks and information sheets (70%), while those that were not part of a chain were less likely to use this method (57%). Instead, these FBOs were more likely to check packaging and labels (35%), ask the chef (28%) and retain ingredient information for the products used (18%).

With regards to sector, catering FBOs were more likely to use handbooks or information sheets (66%) and to ask the chef (28%). Retailers were more likely to state that everything is labelled on products for customers to see (16%) and that they retain all information provided by suppliers (12%). Institutions were more likely to check packaging and labels (45%) and were also notably less likely to use handbooks or information sheets (44%). Table B.4 in Appendix B presents the methods used to check for the presence of allergens by specific sector.

FBOs that sold PPDS foods were more likely to check allergenic ingredients by referring to a handbook or information sheet (68%), though those that only sold PPDS foods were less likely to use this method (47%). Interestingly, given the nature of the upcoming legislative amendment, those that sold only PPDS foods were most likely to say that allergenic information is already labelled on products for customers to see (22%).

### Responsibility for checking ingredients

The responsibility for conducting checks for allergenic ingredients typically lay with the owner or manager of the site (67%) or the head chef (32%). Around one in six FBOs (16%) said that there is no one individual responsible for conducting these checks, instead all staff at the site were responsible for checking for allergens. One in twenty (5%) said that their head office was ultimately responsible.

Owners and managers were less likely to be responsible for checking allergenic ingredients among larger FBOs with 11 or more employees (57%, compared with 82% among establishments with one to four employees). A relatively large proportion of larger FBOs also reported that their head chef was responsible for this (42% vs. 19% among those with one to four employees). Chain FBOs were also less likely to say this responsibility lied with their owner or manager (56% vs. 72% of those not part of a chain).

Furthermore, in terms of sector, for FBOs in the catering sector and institutions it was more likely for the head chef to have responsibility (34% and 44%). Meanwhile for those in retail it was more likely for the owner or manager or the head office to be responsible (73% and 14%).

### Checking or auditing ingredients

Stakeholders in the scoping interviews considered that checking or auditing ingredients from suppliers and wholesalers was a key risk area. They felt that smaller FBOs were likely to face more challenges with auditing ingredients because their supply chains were more fluid and fragmented, unlike larger FBOs which typically have tightly managed supply chains.

Smaller FBOs were considered more likely to purchase ingredients ad-hoc from cash and carry businesses. The likelihood of switching ingredients or product lines on a regular basis was believed to present challenges in terms of ensuring information on allergens is routinely updated. Furthermore, stakeholders mentioned issues around suppliers not always informing FBOs about changes to ingredients, as well as risks associated with importing products where allergen information is not clearly displayed on packaging.

In the survey, close to nine in ten FBOs (86%) said that they check or audit the ingredients they obtain from suppliers and wholesalers: 66% said that they always do this and 20% said that they sometimes do this. Compared to 2012, this marks an increase in the proportion of FBOs that conduct any checks (86%, compared to 71% in 2012), particularly the proportion that always conduct them (66% vs 50%).

However, there were still around one in eight FBOs (12%) that never conduct checks or audit the ingredients they receive from suppliers and wholesalers. When combined with the proportion that sometimes carry out checks, this means a third of FBOs (32%) do not always check the ingredients they receive from suppliers and wholesalers.

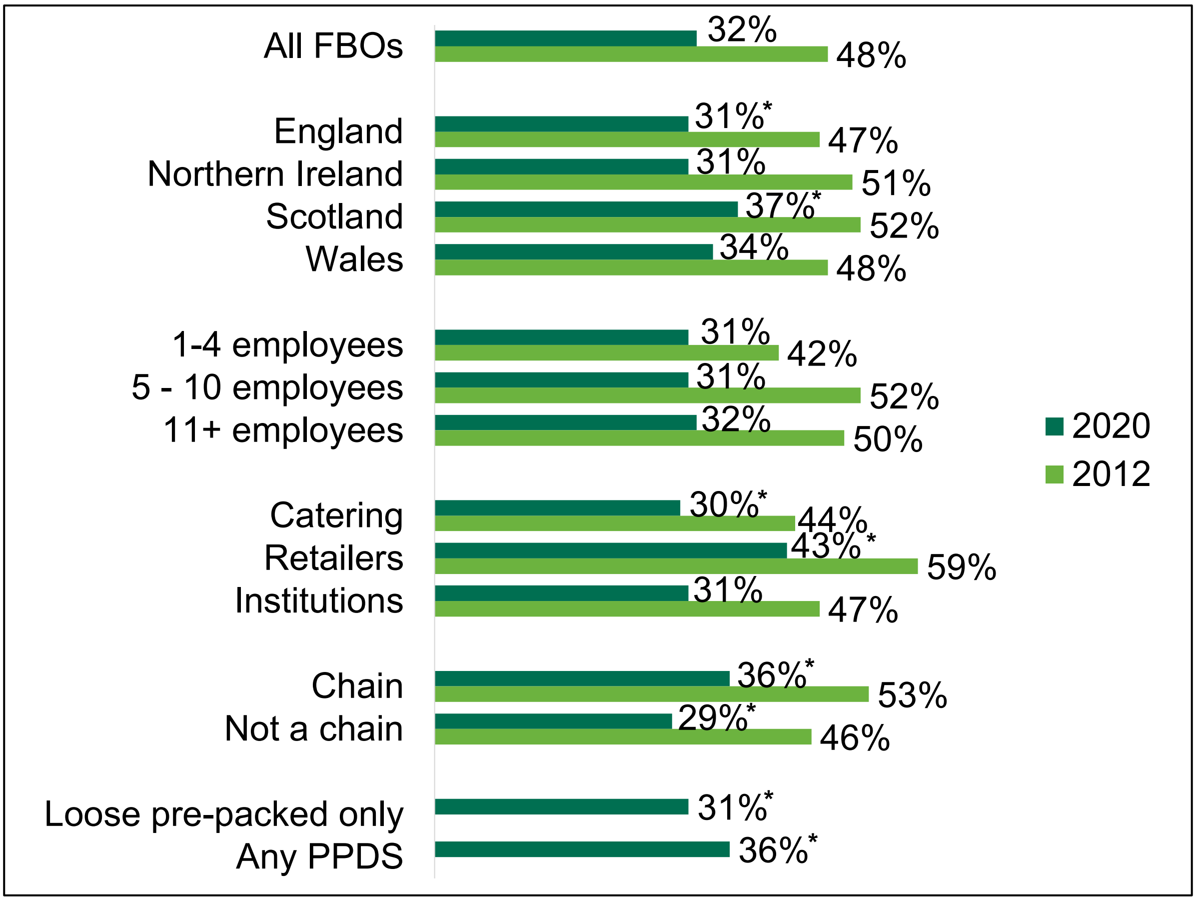
Despite stakeholder concerns about smaller FBOs' ability to keep on top of ingredients information from their supply chains, the survey found that no significant differences between them and larger FBOs in terms of checking ingredients from suppliers and wholesalers.

As presented in Figure 8, retailers were more likely to not always check or audit ingredients from suppliers and wholesalers (43%). Moreover, they were twice as likely overall to never check these ingredients (24%). This was driven by general retail businesses: more than half (53%) did not always check ingredients, with 38% never checking them. By contrast, the catering sector were less likely to not always check ingredients (30%). In fact, FBOs in this sector were more likely to always check supplier and wholesaler ingredients (69%). Takeaways and cafes were both more likely than restaurants to report lapses in their checks of ingredients from suppliers and wholesalers; 41% of takeaways and 36% of cafes did not always do this, compared with 22% of restaurants. Table B.5 in Appendix B shows the proportion of FBOs that do not always check ingredients from suppliers and wholesalers, by specific sector.

FBOs that were part of a chain were more likely to not always check or audit ingredients from suppliers and wholesalers (36%), while those that were single sites were less likely (29%). The former group were more likely to never check ingredients (19%). Meanwhile, the latter were more likely to always check them (70%).

In terms of the type of foods sold, FBOs that sold any PPDS foods were more likely to not always check ingredients from suppliers and wholesalers (36%). However, those that only sold PPDS foods were neither more likely nor less likely to do so. FBOs that only sold other types of non-prepacked products were more likely to always check ingredients from suppliers and wholesalers (68%).

**Figure 8: The proportion of FBOs that do not always check or audit ingredients from suppliers and wholesalers**




Base: All FBOs (2020: 2,303, 2012: 1,666). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Amongst the minority of FBOs that use catering contractors, around three-fifths (62%) reported that they check or audit the ingredients used by contractors: 44% said that they always do this and 18% said that they sometimes do this. A third (33%) said that they never do this, meaning that around half (51%) of FBOs that use catering contractors do not always check the ingredients they use.

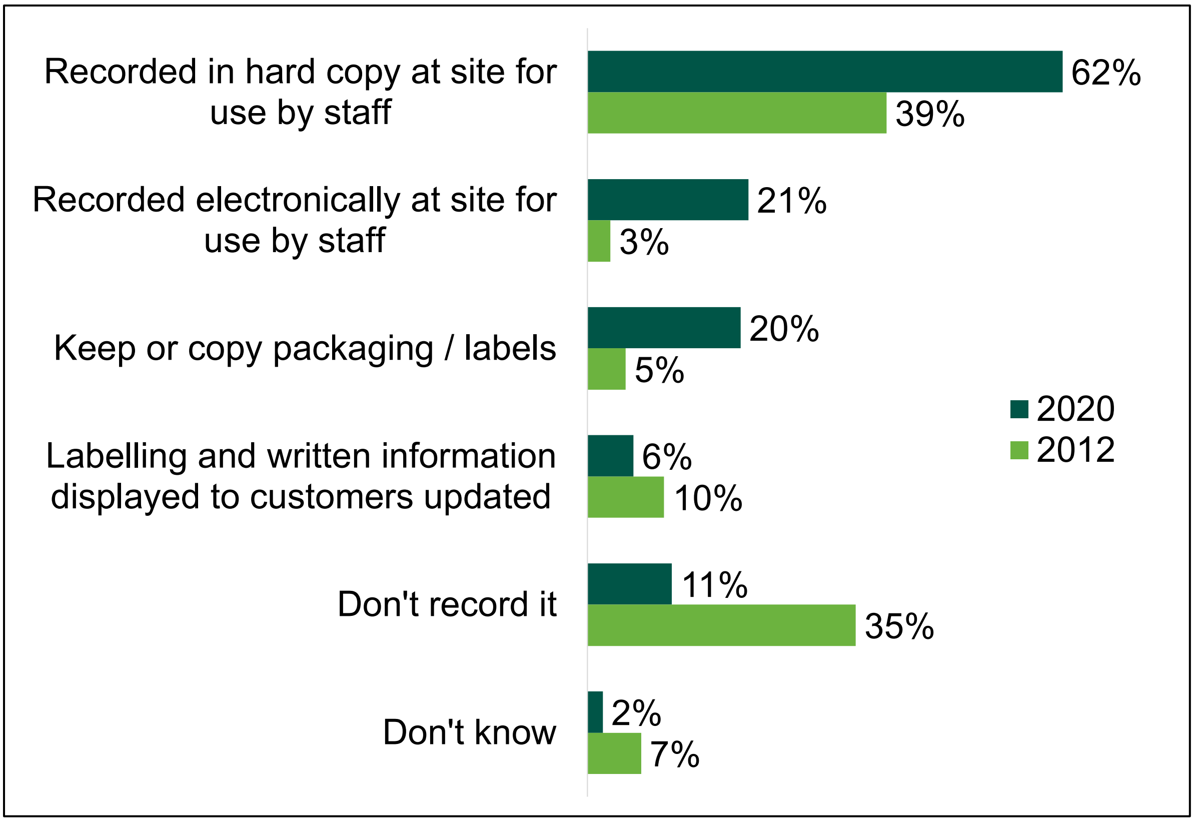
### Recording information

The majority (87%) of FBOs that conduct checks or audits on ingredients recorded information from these checks at their establishment. Of the remainder, 11% said they do not record any information and two per cent were unsure. Compared to 2012 there has been a considerable increase in the number of FBOs that record information from checks on ingredients, rising from 58% to 87%. Back in 2012, 35% of FBOs did not record any information and seven per cent were unsure.

As shown in Figure 9, the most common method used by FBOs to record information about ingredients was to record in hard copy (62%). Other commonly used methods were recording it digitally (21%) and keeping copies of packaging and labels (20%).

Focusing in on those that conduct checks or audits on ingredients but do not formally record information, this was more common amongst smaller FBOs with one to four employees (13%), institutions (17%) and FBOs in England (12%).

**Figure 9: How information on ingredients is recorded**




Base: FBOs that check or audit information on ingredients from suppliers/ wholesalers/ contractors (2020: 1,970, 2012: 1,174).

### Reviewing and updating the methods used to provide information about food allergens

The majority (90%) of FBOs that provide information about allergenic ingredients to consumers review or update their methods of communication every time the products they sell change. This, again, is an increase on 2012, when two-thirds (65%) reported doing so.

However, despite this increase, there are still around one-in-ten FBOs (8%) that do not review or update their methods of communication used when there is a change to food products. Smaller FBOs were more likely to not review or update the methods used: 15% of those with one to four employees did not, compared to four per cent of those with 11 or more employees.

Those that were not part of a chain and those that only sold PPDS foods were also more likely to not conduct reviews and updates (10% and 16%). In terms of sector, FBOs in the retail sector were more likely to not review or update the methods used (13%). This was particularly pronounced amongst fishmongers (42%).

The most common reason given for not reviewing or updating the methods used to communicate allergen information was that there are never any changes made to the food sold (42%). Other reasons included the view that it is the customer's responsibility to ask about allergens (14%) and that there is another organisation that is responsible for dealing with reviewing and updating allergen information (9%).

# Business processes and staff training

### Documentation and guidance and training on food allergen labelling

- Most FBOs had read documentation or guidance on food allergen labelling (83%), an increase from 50% of businesses in 2012. The most common source of this information was the internet (31%) or the FSA (29%).
- Almost half of FBOs (49%) had received formal training on food allergens (34% in 2012). They were most likely to receive this training from their employer (27%).
- Qualitatively, most businesses said they undertook a mixture of formal external training courses (usually senior or kitchen staff) and in-house training programmes. Often knowledge gained through formal training was filtered down the business.

### FSA and FSS website resources

- Most FBOs (91%) were aware of at least one of the six FSA or FSS resources they were prompted with.
- The majority (83%) of businesses had used at least one of the resources and over half (57%) at least three. The most commonly used resource was the advice and guidance webpages (58%).
- There was no standout resource in terms of perceived usefulness.

### Food allergen information provided to staff

- Almost all FBOs provided staff with allergen information in one of the ways listed (99%), most likely through verbal training (90%) or formal training for all new staff (88%). The proportion of FBOs likely to give staff allergen information has increased across all measures since 2012.

### Formal systems to control cross contamination

- Most FBOs (96%) have formal systems or practices in place to prevent cross contamination, an increase from 76% in 2012.
- The most common methods used to control cross contamination were to have separate chopping boards and utensils (63%), separate work areas (49%) and separate food storage (45%).

To support customers in avoiding allergenic foods that pose risk to their health, allergen information must be in place in an establishment and must be correct and available for a customer to make informed decisions. The extent to which a business and its staff are prepared and trained in terms of allergen information and avoiding cross contamination in the workplace is therefore an important consideration in this research and the focus of this chapter

The chapter begins by examining the extent to which businesses have read guidance and had formal training on food allergen labelling, and the source of this guidance and training. The awareness and use of FSA and FSS website resources among businesses is also specifically explored. The chapter then investigates how staff are provided with allergen information. Finally, the chapter looks at what systems and practices businesses have in place to prevent cross contamination.

## Food allergen issues: awareness and training

### Documentation and guidance on food allergen labelling

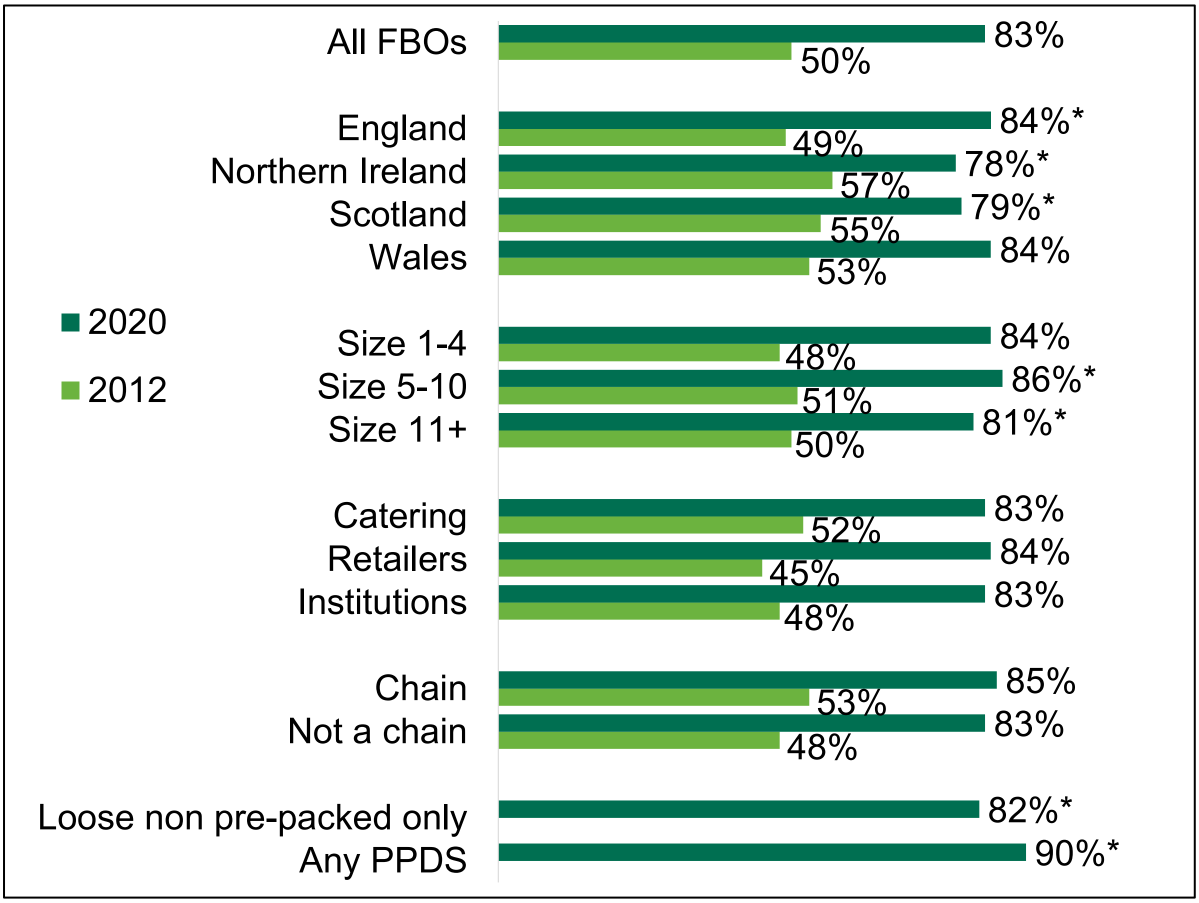
In line with the considerable increase in the provision of allergen information described in the previous chapter, most food businesses had read documentation or guidance on food allergen labelling (83%), an increase from half (50%) of businesses in 2012.

Results varied by country. As shown in Figure 10, businesses in England were more likely to have read materials on food allergen labelling (84%), while businesses in Northern Ireland and Scotland were less likely (78% and 79%). The likelihood of reading information was greater for FBOs with 5-10 employees (86%); less so for businesses with 11 or more employees (81%).

The proportion of FBOs that had read documentation or guidance on allergen labelling was higher among businesses selling PPDS foods (90%), than among those selling only loose, non-prepacked food (82%). There were few differences by sector, with the exception that restaurants and cafes were less likely to have read allergen labelling information (82%), driven by a lower proportion of cafes in particular (80%), while caterers were more likely to have done so (89%). Specific sector differences are shown in Table B.6 in Appendix B.

Interestingly, FBOs that sell or serve food containing only a few allergens (between one and three) were less likely to have read information on allergen labelling than overall (73%).

**Figure 10: Whether the business has read any documentation or guidance on food allergen labelling, compared to 2012**

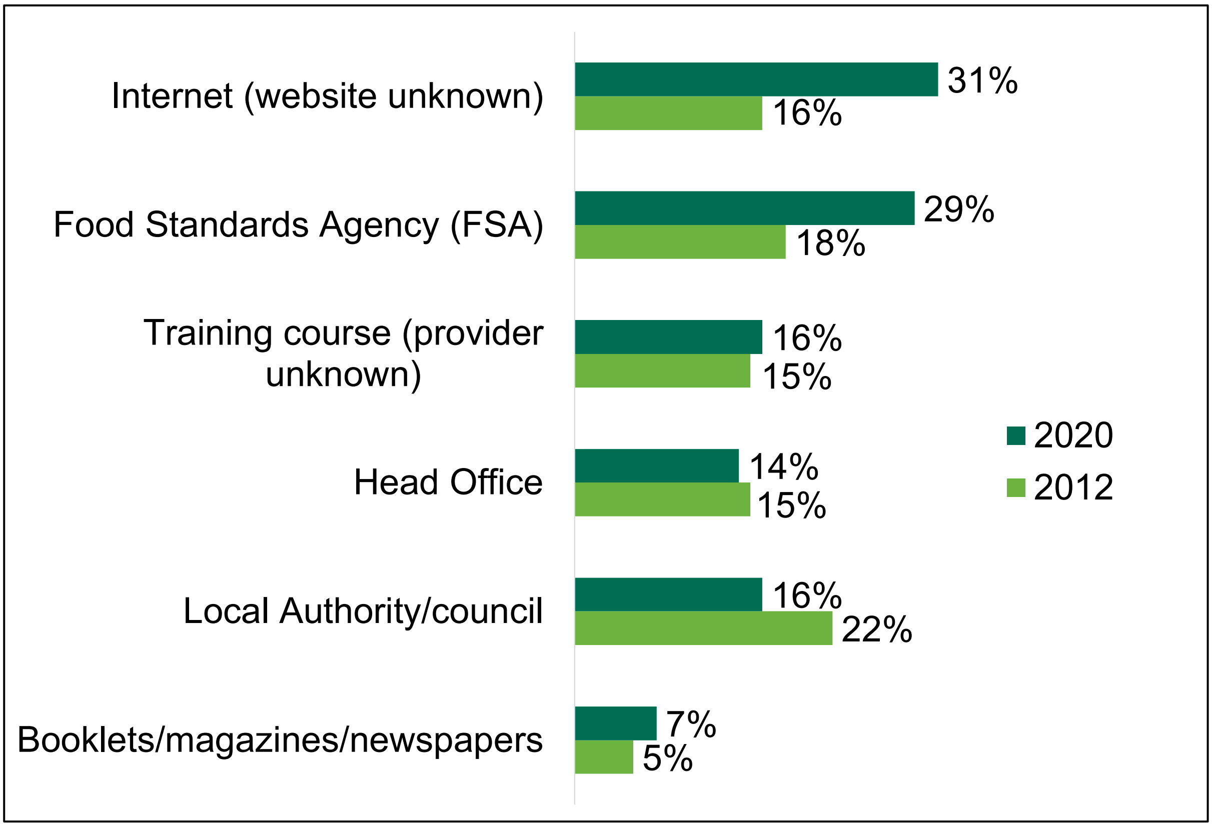



Base: All FBOs: 2020 (2,303); 2012 (1,666). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

The allergen labelling information that FBOs had read was most likely to come from the internet (website unknown, 31%), or materials provided by the FSA (29%). Other sources of information were training courses (provider unknown, 16%), local authorities (including TSO/Enforcement Officers, 16%), head offices (14%) and booklets/magazines/newspapers (7%).

As shown in Figure 11, the internet and the FSA are now more widely used by FBOs as sources of allergen labelling information than in 2012. The proportion of businesses that had read information on the internet almost doubled from 16% in 2012 to 31%, and those that had read the FSA materials increased from 18% in 2012 to 29%. Conversely, the proportion of businesses reporting local authorities (incl. TSO/Enforcement Officers) as a source of information fell from 22% in 2012 to 16% in 2020, suggesting fewer businesses now rely on their local authority or council for this information.

**Figure 11: Where the information that FBOs read on food allergen labelling came from, compared to 2012**




Base: All FBOs that had read documentation and guidance on food allergen labelling: 2020 (1,904); 2012: (857). Results shown for sources mentioned by five per cent of respondents or more.

FBOs in Northern Ireland and Wales were more likely to use local authorities (25% and 23%) for information on allergen labelling, while FBOs in England were less likely (15%). Obtaining this information from local authorities was also more common among:

- Butchers (31%), delicatessens (26%) and restaurants and cafes (18%; driven mostly by cafes, 21%) compared to the general retail sector (5%) and hotels (7%)

- Independent businesses (20%) compared to chains (8%)
- Smaller FBOs, falling from 19% for FBOs with 1-4 employees to 14% for those with 11 or more employees
- Businesses selling only loose, non-prepacked food (17%) compared to businesses selling PPDS foods (15%) and, in particular, businesses selling only PPDS foods (6%).

The FSA was a particularly popular source of information for hotels (40%) and cafes (37%). Conversely, the general retail sector and pubs and bars were less reliant on information from the FSA (20% and 21% respectively), as were FBOs with 11 or more employees (26%). Chains compared to non-chains (15% compared to 36%) and businesses selling any PPDS food compared to those selling loose, non-prepacked food only (23% compared to 31%) were also less likely to read this guidance from the FSA.

### Formal training on food allergen labelling

FBOs who want to learn more about food allergens and allergen safety might undertake formal training. Formal training refers to any training that takes place away from usual work activities. Approaching half (49%) of all businesses had received formal training on food allergens, an increase from just over a third (34%) in 2012.

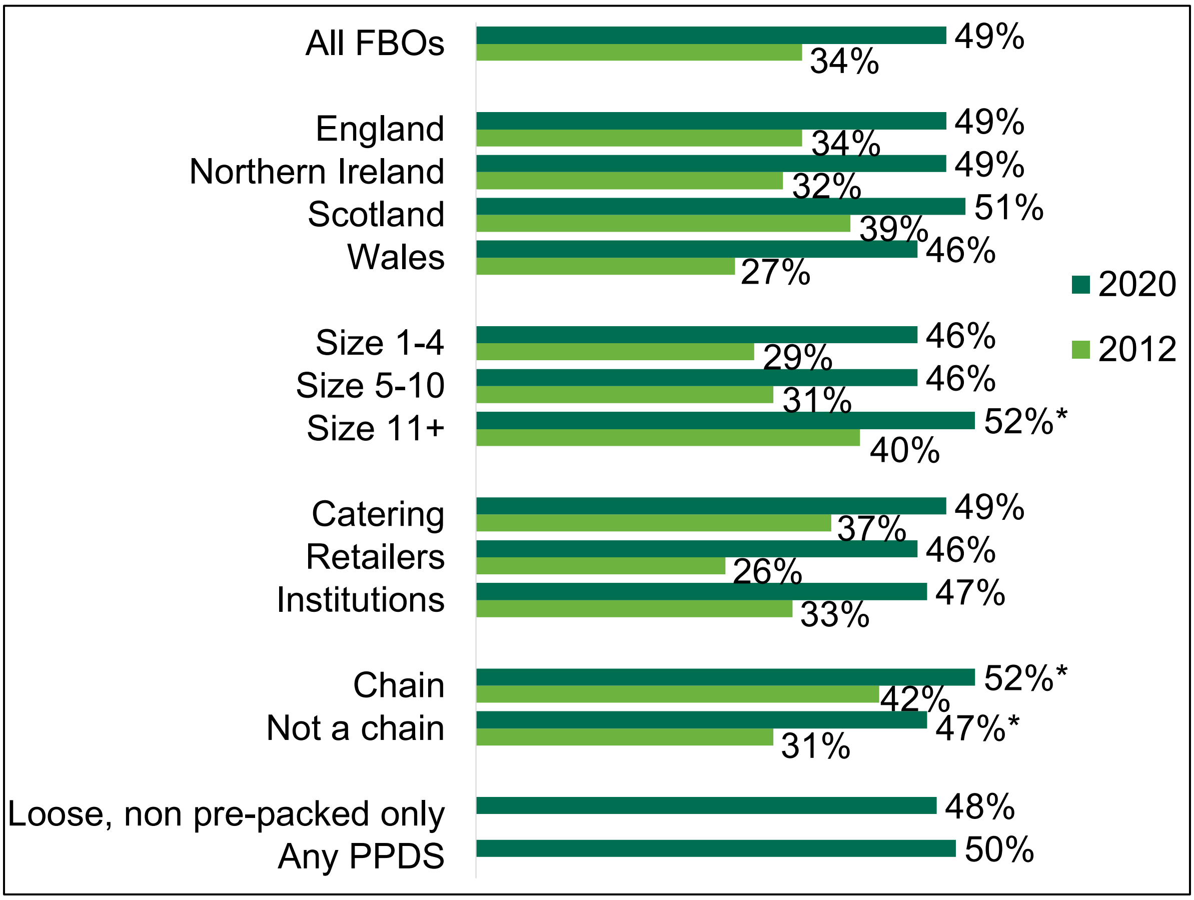
Figure 12 shows differences between businesses in terms of size and FBO structure. Formal training was more common among businesses with 11 or more employees (52%) compared to businesses with 1-4 or 5-10 employees (46% for both). Chains were more likely than non-chain businesses to have had training (52% compared to 47%). This trend was also seen in 2012, though was not significant at the time.

Looking at sector differences, butchers were much less likely than other sectors to have received formal training on allergens (32%). Specific sector differences are shown in Table B.6 in Appendix B.

Training was also less prevalent among sites where the owner's first language was English; more than half (52%) had *not* trained, compared with 44% of sites where the owner spoke a different first language.

In line with the above finding, as well as being less likely to have read allergen labelling information, FBOs that sell or serve products containing between 1 and 3 allergens were less likely to have had formal training on allergens (37%).

**Figure 12: Proportion of businesses that had received formal training on allergens, compared to 2012**

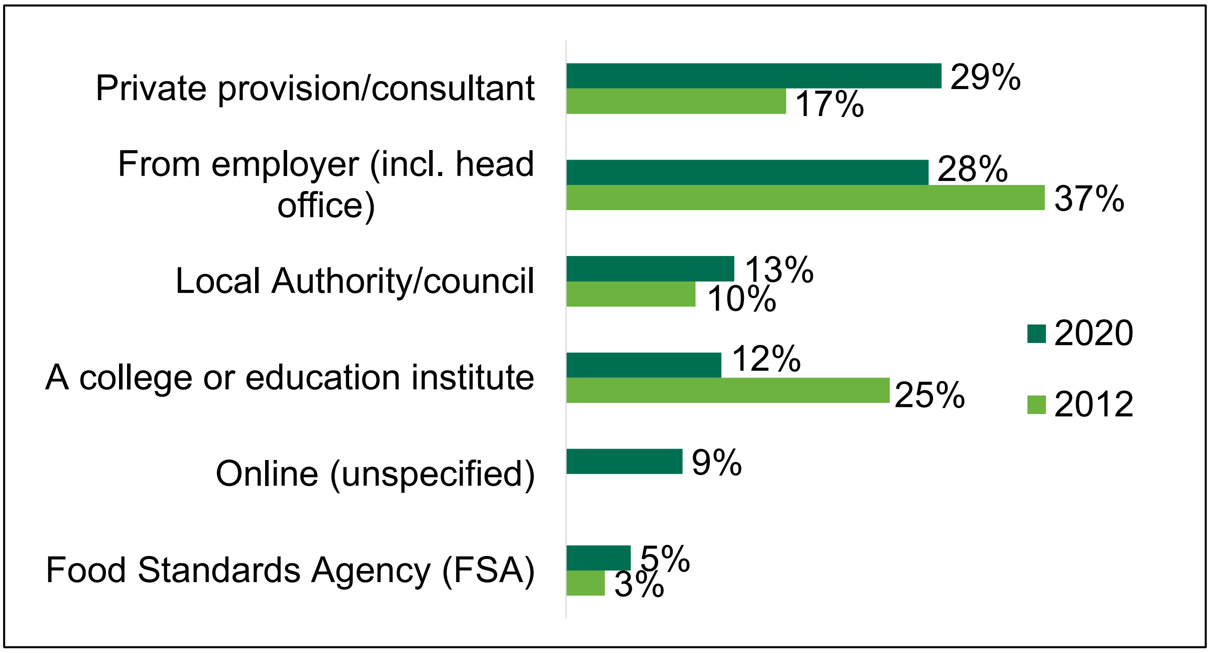



Base: All FBOs: 2020 (2,303); 2012 (1,666). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

The sources that FBOs used for this formal training are shown in Figure 13. The most common providers of formal training were private providers and employers, each mentioned by around three in ten FBOs that had received formal training (29% and 28% respectively).

Compared to 2012, FBOs were less likely to receive allergens training from their employer (28% compared to 37%), or from a college or training institute (12% compared to 25%). Businesses now rely more heavily on private provision/consultants (29% compared to 17%).

**Figure 13: Who provided the formal training that businesses had received on allergens**




Base: All FBOs that had received formal training: 2020 (1,119) 2012 (575). Results shown for sources mentioned by five per cent of respondents or more.

There were slight variations by country. Notably, it was more common in Northern Ireland (38%) and Wales (27%) to receive formal training from local authorities than England (11%) or Scotland (12%).

The proportion of FBOs that received training from their employer increased with size, ranging from 15% of FBOs with 1-4 employees to 38% of FBOs with 11 or more employees. In contrast, FBOs with 11 or more employees were less likely to use private providers (26%), colleges or education institutes (8%) and unspecified online resources (6%) for formal training provision.

Retailers were most likely to receive formal training from their employer compared to the catering sector and institutions (45% compared to 26% and 22% respectively). This was largely driven by the general retail sector, where 63% reported receiving formal training from their employer (in part a reflection of their business structure / ownership and much higher propensity to be part of a chain). Retailers were much less likely to receive training from private provision/consultants (20% compared to 30% for both catering and institutions). The institutions sector was more likely than other FBOs to rely on allergens training from local authorities (21% vs. 13%) or the FSA (11% vs. 5%).

When asked in follow-up interviews about what formal training for staff had covered, businesses mainly mentioned two types of allergens training:

- Formal external training courses: typically, these were either delivered online or face-to-face. Most commonly, these were food hygiene or safety courses (e.g. Food Hygiene Level 2), within which there was an allergens section or module; and,
- In-house training programmes: The extent to which this was structured training varied – for some this was less formal on-the-job training, often part of the induction process. For others, these were formal training sessions which employees had to complete, occasionally with some form of assessment.

The food businesses interviewed often offered a combination of these two broad training types. Both external and internal training was generally completed during the onboarding of a new employee, and then repeated periodically. Employees were often given refresher training if there were changes to menus or the introduction of new products. A few smaller businesses mentioned only completing a one-off training course some years back. One of these businesses said they had undertaken their course ten years ago and did not perceive there to be a need to train because they considered themselves low risk and said they were not visited by EHOs. Instead, this business said they relied on industry news bulletins to inform them on any important regulatory changes.

In some cases, in-house training was delivered via structured programmes, for example through online courses or testing staff after they are given information and exercises to complete

> "It [the online training] covers the 14 main allergens in the UK. Labelling, cross-contamination, how to take a customer's order, how to communicate with the kitchen, how to provide allergen information, signs of anaphylactic shock, how to realise someone is having an anaphylactic shock, administer first aid or get somebody who's in charge of that."
>
> **Restaurant / Cafe, 11+ employees**

Other businesses used lighter-touch or less formal methods, such as presentations during induction, or training on-the-job, for instance by going through allergens lists, information sheets and labelling processes before shifts.

> "We go through things – I wouldn't say on a daily basis because we don't work every day – but when we are in work, I always ask my staff to double-check, go through the list."
>
> **Caterer, 1-4 employees**

External training courses were often only completed by a few senior employees and kitchen staff, who then shared this knowledge with other employees through in-house training or less formally on-the-job. One restaurant felt that, due to this approach, their waiting staff were much less informed on allergens than the kitchen staff, and relied on the kitchen staff to answer questions on this. Consequently, they felt it would be beneficial for all employees to complete a formal training course. Others felt this system of filtering down information worked well.

> "I explain to my staff if someone does approach you and you don't know the answer, then just to them 'I'm not too sure but I will check with the chef', and then we will check and relay the information back to the customer. This is basically how I train my waitresses about allergens."
>
> **Caterers, 1-4 employees**

Most were content with the quality of the training they received from external providers, and while a few felt that the training provided them with information they already knew, it was also acknowledged that new information was learnt on the course which was valued. A couple of participants also noted the helpfulness of training on-the-job to help put theory into practice.

> "Training for the level 3 was very good but you learn a lot of it on the job as well. The scientific terms are a bit different, but you know more by doing things."
>
> **Pub / Bar, 5-10 employees**

In terms of challenges faced in keeping staff trained, some businesses mentioned that issues around resourcing and working patterns made it difficult to ensure staff were available for training when needed. For example, a school mentioned being short-staffed and a care home had issues co-ordinating staff to train at the same time.

> "The main problem is availability of staff. On training day not everybody comes to attend training so if everybody trained, we could improve the quality of service."
>
> **Care home, 11+ employees**

Other less commonly mentioned challenges around training included language barriers among staff whose first language was not English and the timing of some external courses.

> "The only way my local authority does it is if I lose a day's trade and then it is very expensive... for some reason they only run the training in the morning. Well guess when people want a coffee! It's not geared up for people like me, it's geared up for the restaurant industry."

**Caterer, 1-4 Employees**

**FSA and FSS website resources**

The FSA and FSS provide website materials on food allergen labelling for FBOs. Most FBOs (91%) were aware of at least one of the six FSA or FSS website resources that they were prompted with during the survey. Awareness was highest for the advice or guidance webpages (79%), followed by posters (74%), FSA's technical guidance (73%), E-training on allergens (65%), recipe sheets (59%) and menu grids and templates (58%).

Table 6 shows variations in awareness by survey subgroup. FBOs in Scotland had relatively low levels of awareness of almost all website resources. By sector, retailers had lower than average awareness of all materials, and lower awareness compared to the catering sector and institutions across most materials. A full sector breakdown is shown in Table B.7 in Appendix B. FBOs where the owner's first language was not English had higher awareness for FSA's technical guidance compared to sites where the owner's first language was English (82% compared to 72%).

**Table 6: Awareness of FSA and FSS website resources across FBOs, by country, sector and food type**

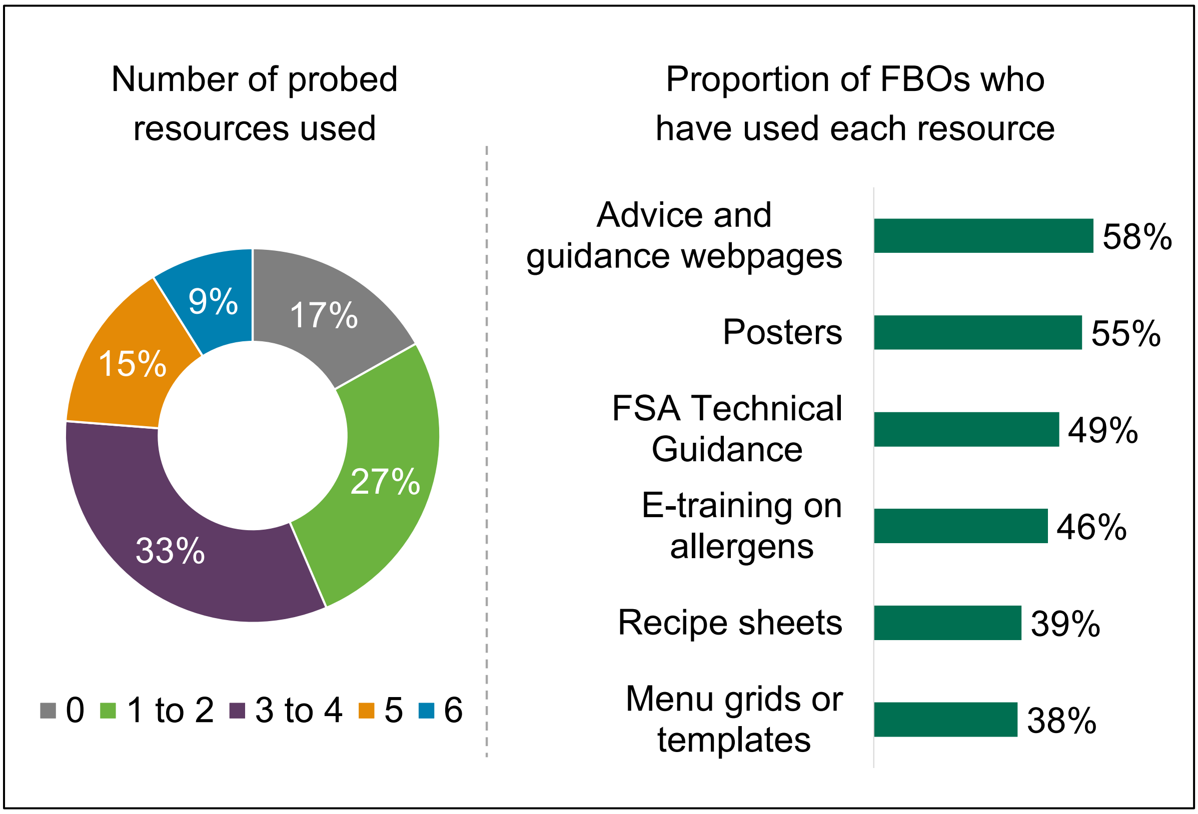
| Survey group | Advice or guidance webpages | Posters | FSA's Technical Guidance | E-training on allergens | Recipe sheets | Menu grids or templates |
|---|---|---|---|---|---|---|
| **Total** | **79%** | **74%** | **73%** | **65%** | **59%** | **58%** |
| England | 80% | 75% | 73% | 66%* | 59% | 59% |
| Northern Ireland | 79% | 75% | 66%* | 58%* | 55% | 60% |
| Scotland | 76% | 70%* | 68%* | 59%* | 53%* | 53%* |
| Wales | 80% | 72% | 75% | 66% | 62% | 57% |
| Size 1-4 | 81% | 71%* | 73% | 64% | 55%* | 57% |
| Size 5-10 | 76%* | 75% | 73% | 60%* | 59% | 59% |
| Size 11+ | 81% | 76% | 73% | 68%* | 62%* | 59% |
| Catering | 80% | 75% | 74%* | 66% | 61%* | 62%* |
| Retailers | 70%* | 61%* | 68%* | 52%* | 49%* | 43%* |
| Institutions | 83%* | 83%* | 71% | 71%* | 60% | 57% |
| Chain | 75%* | 75% | 70%* | 67% | 56%* | 56% |
| Not a chain | 81%* | 74% | 74%* | 64% | 60%* | 59% |
| Loose non-prepacked only | 81%* | 75%* | 73% | 66%* | 60%* | 60%* |
| Any PPDS | 72%* | 70%* | 70% | 61%* | 53% | 48%* |
| Owners first language: English | 79% | 75% | 72%* | 65% | 59% | 58% |
| Owners first language: Not English | 79% | 73% | 82%* | 61% | 59% | 61% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Figure 14 shows how many of the prompted resources businesses had used and the proportion of FBOs that had used each resource. The large majority (83%) of businesses had used at least one of the resources presented and over half (57%) had used at least three.

In line with levels of awareness, the advice and guidance webpages were the most widely used resource by food businesses (58%), followed by the posters (55%). Between a third and a half had used each of the other four resources.

**Figure 14: The number of FSA or FSS resources businesses are likely to have used, and the proportion of FBOs that have used each**




Base: All FBOs (2,303).

There were differences by country, but no real patterns among resources used. However, it was more common for FBOs in England and Wales (57% and 62% respectively) to have used three or more of the prompted resources than in Northern Ireland and Scotland (48% and 50% respectively). Differences are shown in Table 7.

A higher proportion of FBOs with 1-4 employees had used advice or guidance webpages (62%), whereas use of posters (57%) and E-training on allergens (50%) was more common among FBOs with 11 or more employees.

Reflecting awareness, retailers were less likely to have used any of the prompted resources compared to both the catering sector and institutions (68% compared to 84% and 90%), in particular butchers (66%), fishmongers (66%, n.b. a low base size of 30) and the general retail sector (60%). Specific sector differences are shown in Table B.8 in Appendix B).

In terms of food type, it was more common among FBOs only selling loose non-prepacked food to have used most of the FSA resources on allergen information than FBOs selling PPDS foods. This difference was most apparent for the advice or guidance webpages (61% compared to 44%) and posters (57% compared to 46%). Use of posters was more prevalent among sites where the owner's first language was English (56%) compared to those where the owner's first language was not English (44%). Those with owners whose first language was not English were more likely to have used the FSA Technical Guidance (58% compared to 48%).

**Table 7: FSA and FSS resources used by FBOs**

| Survey group | Advice or guidance webpages | Posters | FSA's Technical Guidance | E-training on allergens | Recipe sheets | Menu grids or templates | Any resource | 3+ resources |
|---|---|---|---|---|---|---|---|---|
| **Total** | **58%** | **55%** | **49%** | **46%** | **39%** | **38%** | **83%** | **57%** |
| England | 58% | 56%* | 49% | 47%* | 39% | 38% | 83% | 57%* |
| Northern Ireland | 54% | 54% | 37%* | 35%* | 34% | 37% | 81% | 48%* |
| Scotland | 55% | 48%* | 51% | 40%* | 34% | 37% | 82% | 50%* |
| Wales | 64%* | 54% | 57%* | 46% | 41% | 36% | 84% | 62%* |
| Size 1-4 | 62%* | 50%* | 51% | 44% | 38% | 39% | 84% | 57% |
| Size 5-10 | 58% | 55% | 50% | 41%* | 37% | 36% | 81% | 56% |
| Size 11+ | 56% | 57%* | 47% | 50%* | 41% | 39% | 84% | 57% |
| Catering | 60%* | 54% | 52%* | 45% | 41%* | 41%* | 84%* | 58%* |
| Retailers | 39%* | 35%* | 36%* | 36%* | 27%* | 20%* | 68%* | 38%* |
| Institutions | 65%* | 71%* | 49% | 56%* | 39% | 37% | 90%* | 64%* |
| Chain | 47%* | 53% | 42%* | 52%* | 39% | 37% | 79%* | 51%* |
| Not a chain | 64%* | 55% | 53%* | 43%* | 39% | 39% | 85%* | 60%* |
| Loose non-prepacked only | 61%* | 57%* | 50%* | 46% | 40% | 39%* | 85%* | 58%* |
| Any PPDS | 44%* | 46%* | 43%* | 45% | 35% | 33%* | 75%* | 49%* |
| Owners first language: English | 59% | 56%* | 48%* | 46% | 39% | 38% | 84% | 57% |
| Owners first language: Not English | 51% | 44%* | 58%* | 43% | 38% | 42% | 81% | 52% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

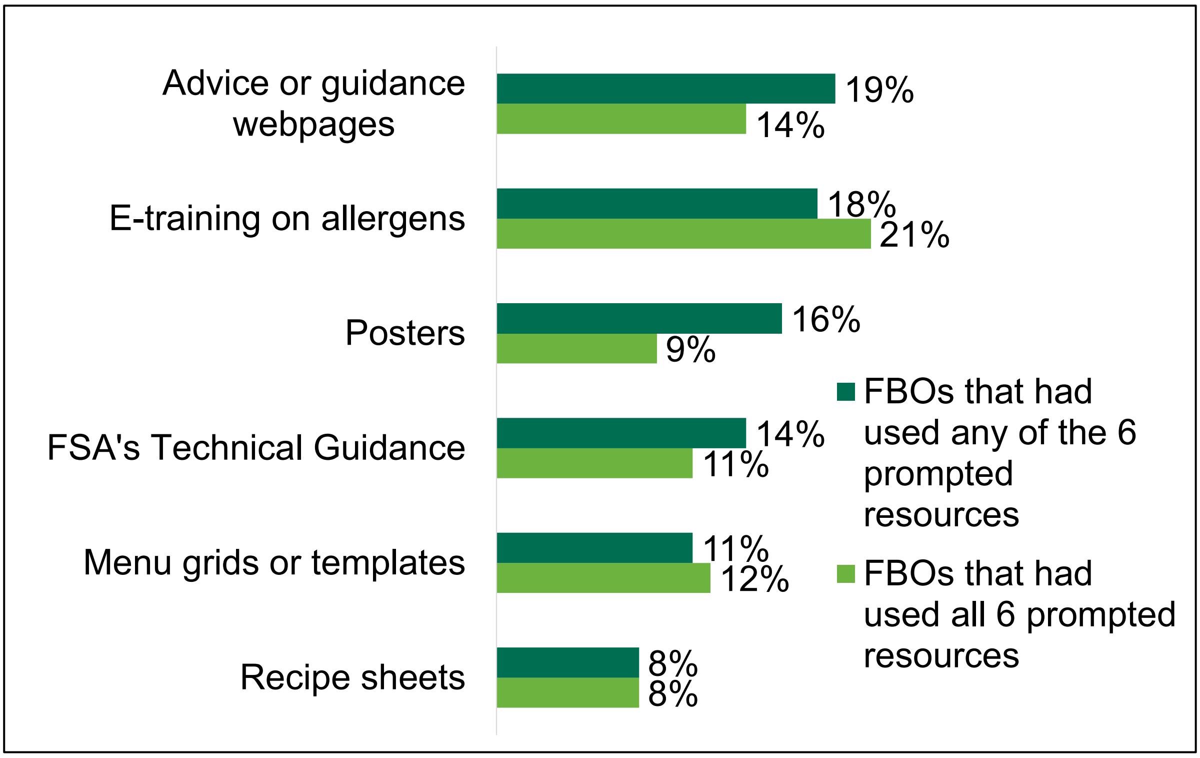
There was no clear standout resource in terms of usefulness. Among those who had used any of the FSA or FSS resources, the FSA advice or guidance webpages were deemed the most useful; almost two in five FBOs (19%) thought this was the most useful resource out of those they had used. This was followed by E-training on allergens (18%), posters (16%), FSA's Technical Guidance (14%) and the menu grids or templates (11%). Less than one in ten found the recipe sheets (8%) the most useful.

The results showing the extent to which a resource is deemed most useful are somewhat influenced by the extent to which the resource has been used across FBOs. It is arguably fairer to compare the usefulness of the resources based on the responses of FBOs who had used *all six* of the prompted types of information, despite a much smaller base size for this group (which therefore restricts any subgroup analysis).

Figure 15 shows differences between responses based on these two groups. Comparing all six resources, E-training on allergens was the most useful (21%). Fewer found the advice or guidance webpages (14%), menu grids or templates (12%) and FSA's technical guidance (11%) the most useful resource. Less than one in ten FBOs found the posters and recipe sheets the most useful out of the six resources (9% and 8% respectively).

Interestingly, FBOs that had used all 6 resources were more likely than average to say that the resources were all equally useful (22% compared to 11%).

**Figure 15: Which FSA or FSS resources FBOs were found most useful**




Base: All FBOs that had used FSA or FSS resources, (1,906); All FBOs that had used all six prompted resources (203). Results shown for resources used by five per cent of respondents or more.

Variations among types of FBO that had used *any* of the FSA or FSS resources (as opposed to all six) are shown in Table 8. Notably by country, FBOs in Scotland found the advice or guidance webpages the most useful resource (24%) whereas a higher proportion in Wales thought the FSA Technical Guidance was the most useful (20%).

There were patterns by FBO size, where the advice or guidance webpages were more popular among smaller FBOs (24% for those with 1-4 employees, falling to 15% for those with 11 or more employees). An opposite trend was seen for the E-training on allergens (ranging from 13% for FBOs with 1-4 employees to 22% for those with 11 or more).

Perceived usefulness also differed between FBOs in different sectors. Menu grids and templates and recipe sheets were more popular among FBOs in the catering sector (12% and 10% respectively), whereas FSA's Technical Guidance was much more popular among retailers (20%), and E-training among Institutions (22%). Specific sectors had different preferences for the FSA/FSS resources:

- The advice or guidance webpages were found more useful by takeaway restaurants (34%), delicatessens (32%) and butchers (31%)

- E-training was found more useful by general retail (29%) and institutions (22%)
- FSA's Technical Guidance was found more useful by bakers (23%)
- The menu grids or templates were found more useful by hotels (22%) and pubs and bars (17%)
- The recipe sheets were found more useful by restaurants/cafes (11%)
- And the information sheets/charts/booklets were found more useful by butchers (6%).

A full breakdown of sectoral differences is shown in Table B.9 in Appendix B.

**Table 8: Most useful FSA or FSS resource used by FBOs**

| Survey group | Advice or guidance webpages | E-training on allergens | Posters | FSA's Technical Guidance | Menu grids or templates | Recipe sheets | Information sheets/ charts/ booklets |
|---|---|---|---|---|---|---|---|
| **Total** | **19%** | **18%** | **16%** | **14%** | **11%** | **8%** | **1%** |
| England | 18% | 18% | 16% | 14% | 10% | 9% | 1% |
| Northern Ireland | 22% | 15% | 19% | 12% | 14% | 6% | 3%* |
| Scotland | 24%* | 15% | 14% | 14% | 12% | 6% | 1% |
| Wales | 16% | 20% | 13% | 20%* | 9% | 8% | 1% |
| Size 1-4 | 24%* | 13%* | 14% | 18%* | 10% | 8% | 3%* |
| Size 5-10 | 19% | 15% | 18% | 12% | 10% | 11%* | <0.5%* |
| Size11+ | 15%* | 22%* | 15% | 14% | 11% | 7% | 1% |
| Catering | 19% | 16%* | 15% | 14% | 12%* | 10%* | 1% |
| Retailers | 21% | 21% | 14% | 20%* | 5%* | 8% | 1% |
| Institutions | 18% | 22%* | 19% | 14% | 10% | 3%* | 1% |
| Chain | 15%* | 27%* | 14% | 12%* | 8%* | 8% | <0.5%* |
| Not a chain | 20%* | 14%* | 16% | 15%* | 12%* | 9% | 2%* |
| Loose non-prepacked only | 19% | 17%* | 16%* | 13%* | 12%* | 8% | 1% |
| Any PPDS | 17% | 22%* | 12%* | 20%* | 6%* | 9% | 1% |

Base: All FBOs that had used FSA or FSS resources (1,906). See Table A.3 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

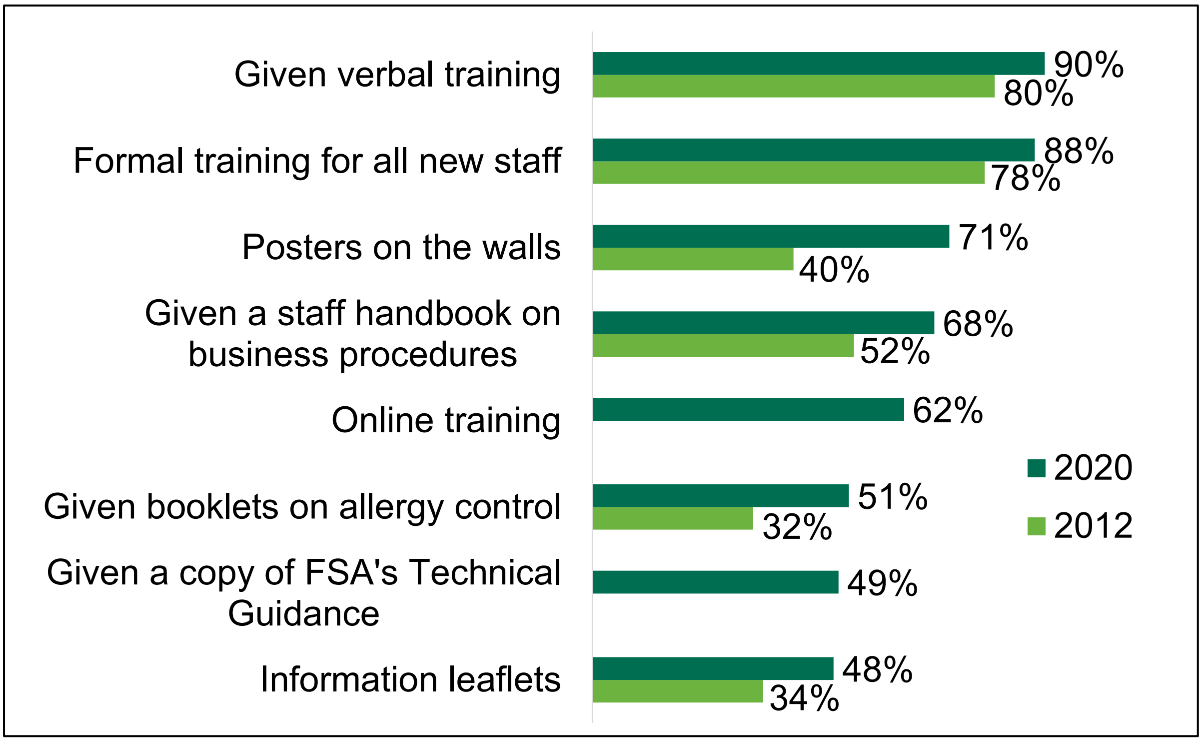
## Food allergen information provided to staff

FBOs were asked to indicate from a list the methods used to provide staff with allergen information. Allergen information in this context includes information on the risks of cross contamination of allergens.

Almost all businesses reported providing staff with allergen information in one of the prompted ways listed (99%). Verbal training was the most common method of informing staff (90%) followed by formal training for all new staff (88%). The majority provide information through posters on the walls (71%), a staff handbook on business procedures (68%) and online training (62%). Around half give allergy booklets on allergy control (51%), a copy of the FSA's technical guidance (49%) and information leaflets (48%).

As shown in Figure 16, the proportion of businesses likely to give staff allergen information has increased across all measures since 2012.

**Figure 16: How businesses provide allergen information to staff, compared to 2012**




Base: All FBOs: 2020 (2303); 2012 (1,666). N.b. Online training and the FSA's Technical Guidance were not presented as options in 2012.

There were variations in methods used to provide allergen information to staff by country and sector, as shown in Table 9. In terms of size, most methods of providing information were less common among FBOs with 1-4 employees, apart from giving booklets on allergy information and a copy of the FSA's Technical Guidance.

Verbal training (91%) and online training (63%) were more common among sites where the owner's first language was English compared to those where the owner spoke a different first language (81% and 53% respectively), which are more likely to give booklets (60% compared to 50%).

**Table 9: Subgroup variation in food allergen information provided to staff**

| Survey group | Given Verbal Training | Formal training for all new staff | Posters on the walls | Given a staff handbook on business procedure | Online training | Given booklets on allergy control | Given a copy of FSA's Technical Guidance | Informati on leaflets |
|---|---|---|---|---|---|---|---|---|
| **Total** | **90%** | **88%** | **71%** | **68%** | **62%** | **51%** | **49%** | **48%** |
| England | 90% | 88% | 71% | 69%* | 63%* | 51% | 49% | 48% |
| Northern Ireland | 91% | 85% | 71% | 59%* | 44%* | 57%* | 46% | 49% |
| Scotland | 89% | 87% | 68% | 67% | 53%* | 52% | 52% | 46% |
| Wales | 90% | 87% | 73% | 64% | 65% | 55% | 57%* | 55%* |
| Size 1-4 | 84%* | 75%* | 66%* | 58%* | 46%* | 52% | 54%* | 43%* |
| Size 5-10 | 93%* | 92%* | 68% | 66% | 57%* | 54% | 49% | 47% |
| Size 11+ | 91% | 93%* | 76%* | 76%* | 74%* | 50% | 47% | 52%* |
| Catering | 91%* | 87%* | 71% | 68% | 59%* | 55%* | 52%* | 47% |
| Retailers | 89% | 89% | 62%* | 65% | 55%* | 45%* | 44%* | 46% |
| Institutions | 86%* | 92%* | 79%* | 71% | 80%* | 42%* | 45%* | 53%* |
| Chain | 90% | 93%* | 78%* | 74%* | 80%* | 54% | 50% | 52%* |
| Not a chain | 90% | 85%* | 68%* | 66%* | 53%* | 50%* | 49% | 46%* |
| Loose non-prepacked only | 89% | 87% | 71% | 67%* | 61%* | 51% | 50% | 47% |
| Any PPDS | 92% | 90% | 72% | 73%* | 67%* | 53% | 47% | 52% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. A full breakdown by sector is shown in Table B.10 in Appendix B. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup.

## Formal systems to control cross contamination

Cross contamination occurs when bacteria or other microorganisms are transferred from one surface, substance or object to another, with harmful effect. In terms of food allergens, small amounts of one allergen can transfer to another food through cooking equipment, food storage practices and kitchen surfaces, for example, resulting in a contaminated end product that contains small amounts of the allergenic food. This poses a potential risk to consumers allergic to that food.

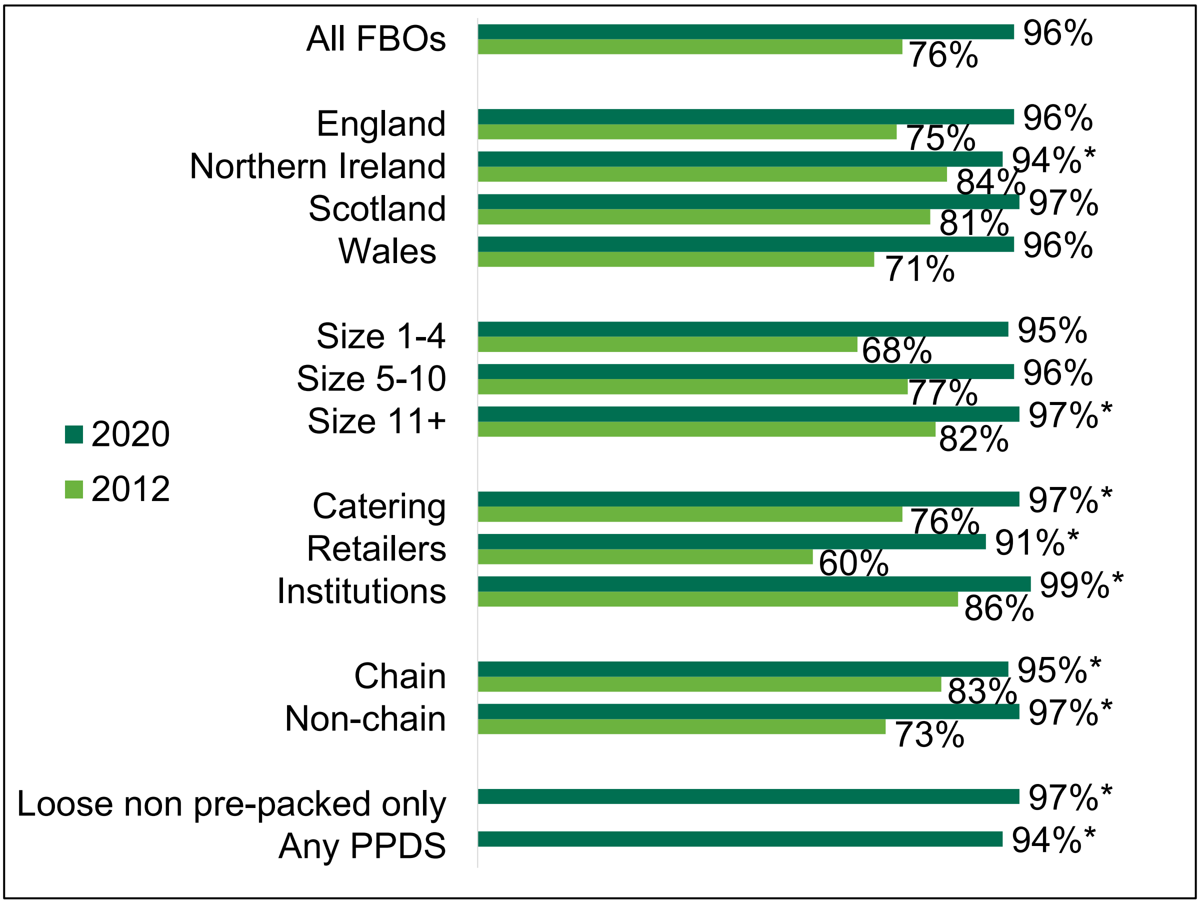
During scoping interviews, one of the most commonly mentioned risk areas in terms of allergens was cross-contamination. This was typically felt to be a greater risk amongst smaller FBOs like cafes and takeaways. This is because these businesses generally prepare food on site, have small kitchens and have less stringent controls in place around food preparation.

> "Cross-contamination is also a huge risk for smaller retailers. This is because they usually operate in small premises with small kitchens."
>
> **Industry representative**

In the survey almost all food businesses (96%) have formal systems or practices in place to prevent cross contamination in relation to food allergens. This proportion has increased considerably from 2012, where around three quarters (76%) reported having formal systems in place.

Figure 17 shows that in 2012 there was relatively wide variation between those most and least likely to have formal systems in place. This gap has now closed considerably, and across all subgroups the likelihood of having a formal system or practice in place is over 90%.

**Figure 17. Food businesses that have a formal system or practice in place to prevent cross contamination in 2020 compared to 2012**




Base: All FBOs: 2020 (2,303); 2012 (1,666). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

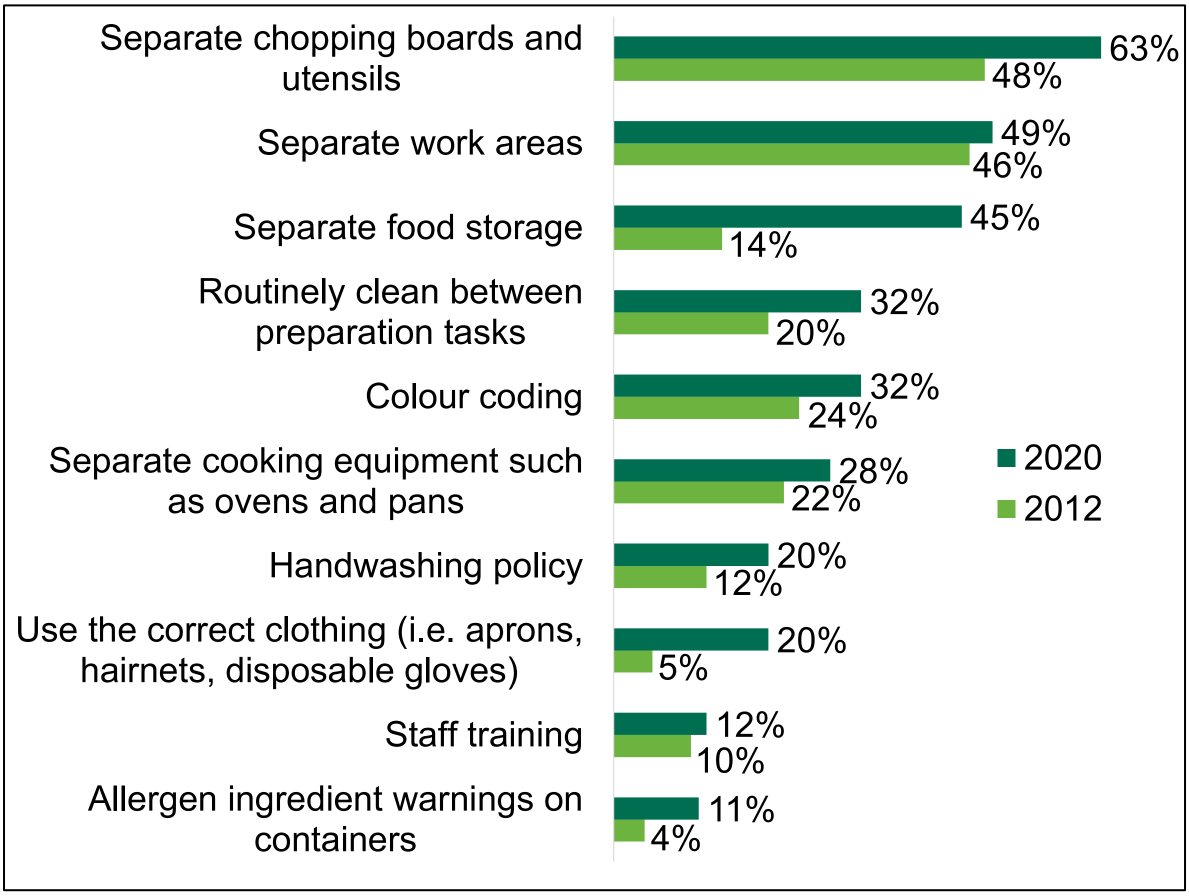
FBOs with formal systems in place were asked what systems they use to prevent cross contamination in relation to food allergens. This was an unprompted question, meaning respondents answered freely without being prompted with possible options.

Findings are presented in Figure 18. The most common system used by FBOs was to have separate chopping boards and utensils (63%), followed by separate work areas (49%) and separate food storage (45%). Just under a third routinely clean between preparation tasks (32%), colour code (32%) and have separate cooking equipment such as ovens and pans (28%). A minority cite the use of correct clothing (i.e. aprons, hairnets, disposable gloves; 20%) and some report using staff training (12%) and allergen ingredient warnings on containers (11%) as systems.

A small proportion of FBOs (all under 5%) refer to various health and safety manuals/booklets/checklists/posters, label and date everything, have internal and external checks/audits, separate preparation methods/timings for allergenic foods and use specific cleaning products as methods to prevent cross contamination.

The systems used by FBOs have generally remained the same from 2012, but the use of nearly all these systems has increased since 2012, considerably for some measures such as separate food storage.

**Figure 18. Systems businesses use to prevent cross-contamination, compared to 2012**




Base: All FBOs that have formal systems in place to prevent cross contamination: 2020 (2,219); 2012 (1,240).

There were differences between systems used by country. FBOs in Northern Ireland and Scotland were less likely to colour code than England and Wales (23% and 26% compared to 32% and 36%) and less likely to use separate chopping boards/utensils (57% in both Northern Ireland and Scotland) compared to England (64%). A lower proportion of FBOs in Scotland reported using correct clothing (15% compared to 20% elsewhere).

Looking at sectors, the catering sector were more likely than retailers or institutions to have separate chopping boards and utensils (67%), separate work areas (52%) and separate cooking equipment (46%). Retailers were less likely to colour code (22%) than the catering sector (34%) or institutions (30%).

FBOs with 11 or more employees were more reliant on staff training (14%) as a method to prevent cross contamination compared to those with 1-4 employees (11%) and 5-10 employees (10%), as were chains compared to non-chains (16% compared to 11%). Both large businesses and chains were also less likely to routinely clean between preparation tasks as a way of avoiding cross contamination than average (29% and 26% respectively).

# Reflections on the 2014 Food Information Legislation

**Prevalence of challenges in relation to the 2014 legislation**

- Over two-fifths of FBOs (44%) said they had faced challenges around the 2014 legislation. This meant that a slight majority (53%) of FBOs had not faced any challenges relating to the 2014 legislation (three per cent were unsure).
- FBOs in Northern Ireland were more likely to have faced challenges than average (53%). Likelihood of facing challenges also increased with size, ranging from 39% of FBOs with one to four employees, up to 48% of those with 11 or more employees. Independent sites were more likely to have faced challenges than chains (47% vs. 39%).
- By sector, those in catering sectors were more likely than retailers to have faced challenges (47% vs. 35%)

**Types of challenges faced**

- Among those who had reported them, the main challenge faced in relation to the 2014 legislation was remembering to update and keep on top of allergen information (30%), and this was particularly acute among takeaway restaurants (51%).
- Other relatively common challenges include:
    - Staff training and awareness (23%);
    - The time it takes to regularly update information (18%);
    - Ensuring suppliers provide the correct information (15%); and
    - Logging / record-keeping of allergen information (13%).

Under the EU FIC regulation outlined in the introduction to this report, FBOs are required to communicate to consumers (either in written form, or orally) if any of the 14 allergens covered by the regulations have been added as ingredients or processing aids to non-prepacked foods that they sell.

The 2012 survey provided a picture of the food landscape prior to enforcement of the legislation in 2014. So far, this report has shown how the food industry has changed in terms of the provision of information on allergens and the business processes that support this by comparing the current situation with the 2012 baseline. However, the 2020 survey also introduced a new question, asking FBOs what challenges they had faced as a result of the 2014 legislation. These findings will help to highlight aspects of the regulations which businesses may require more support with, as well as identifying particular types of FBOs for whom these challenges are more acute.

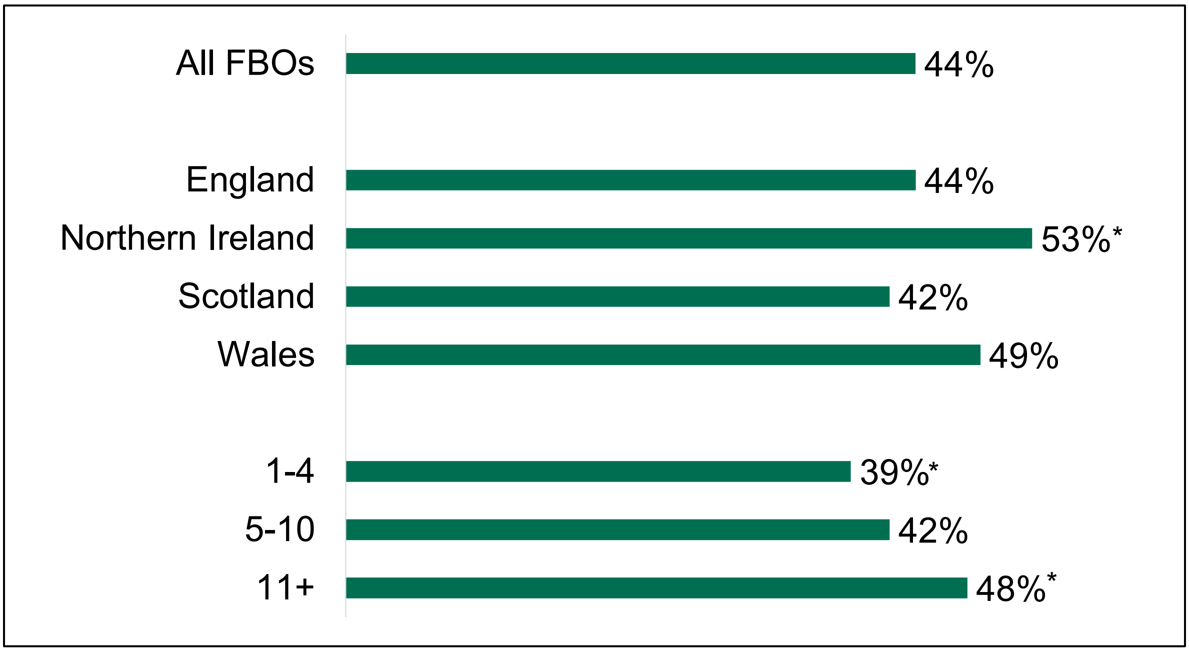
## Prevalence of challenges in relation to the 2014 legislation

When FBOs were asked about the main challenges they had faced regarding the 2014 legislation, more than half (53%) said they had not faced any, more than two-fifths (44%) mentioned facing some challenges and three per cent were unsure. As Figure 19 shows, results varied by nation. Northern Ireland, for example, was the only nation where a greater proportion of FBOs had faced challenges (53%) than had not (45%). In Wales there was an even split between those that had faced challenges and those that had not (each 49%), while a slight majority of businesses in England and Scotland had not faced any challenges (53% and 56% respectively).

Results suggest that smaller businesses have coped better with the changes. Only two in five (39%) FBOs with 1 to 4 employees said they had faced challenges, with this rising to almost half (48%) among FBOs with 11 or more employees. Independent sites were more likely than chains to report challenges (47% and 39% respectively), despite being composed of a smaller share of larger businesses with 11 or more employees (33% and 69% respectively). Taking these results together, large (i.e. with 11 or more employees) independent sites were most likely to face challenges (54%, compared with 43% of large chains, 40% of small independent sites and 33% of small chains), potentially because these FBOs require more formal processes in place and have more staff to educate, but do not have a head office to provide guidance.[22]

[22] Small FBOs here are defined as those with fewer than five employees.

**Figure 19: Proportion of FBOs that faced challenges with the 2014 legislation, by country and size**



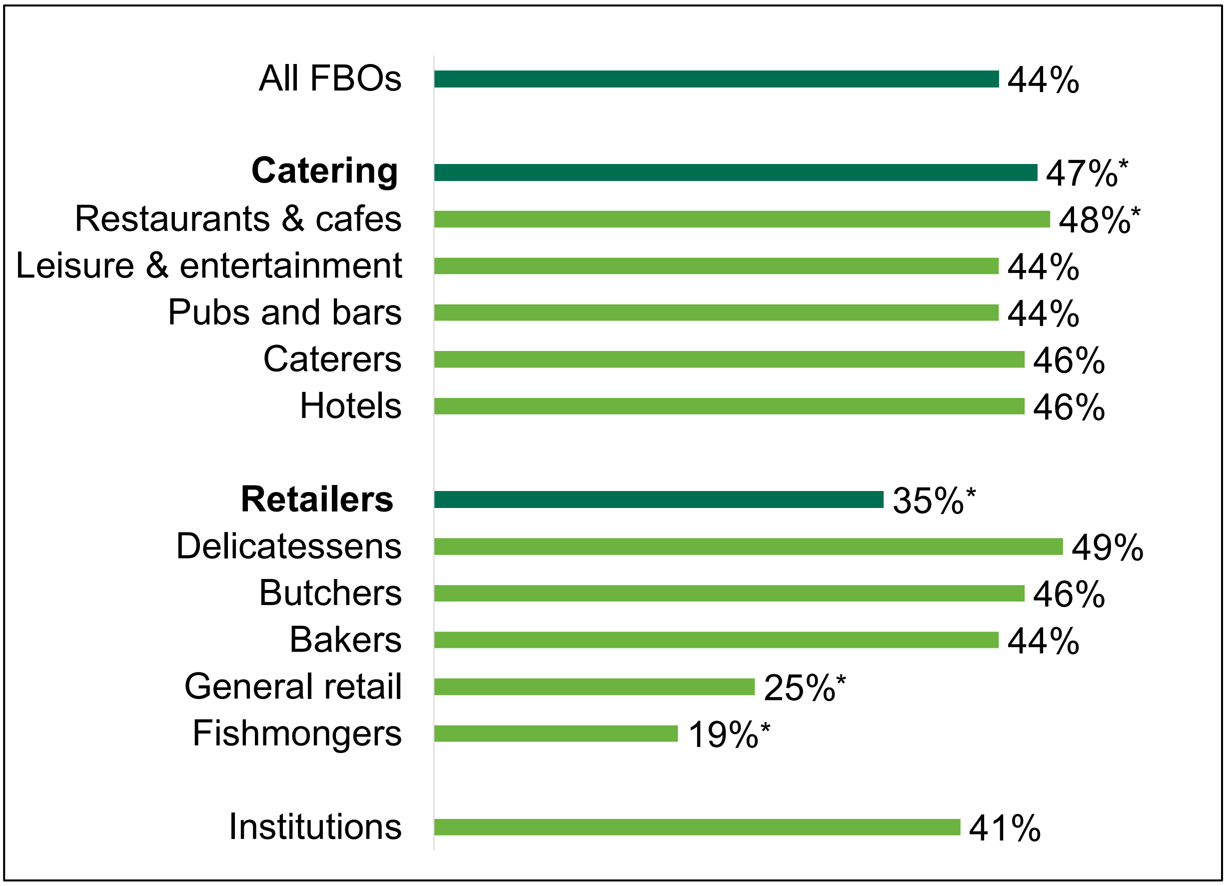

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

FBOs in the catering sector were more likely than retailers to have faced challenges (47% and 35% respectively). These differences were, in part, due to the greater prevalence of allergenic ingredients used by catering sites; over half (51%) of these sites sold or served 10 or more of the 14 allergens covered by the legislation, compared with around three in ten (31%) retailers. In terms of specific sectors, restaurants and cafes were most likely to have faced challenges (48%), while this was least common among general retail businesses (25%) and fishmongers (19%).[23] The lower prevalence of challenges among general retail businesses may be explained, in part, by it having the largest share of chain establishments (67%, compared with 33% on average). Sectoral results are shown in Figure 20.

Taking these size and sectoral results together, it is no surprise that larger catering sector businesses with 11 or more employees (54%) were particularly likely to have reported challenges.

[23] Note a low base size of 30 fishmongers.

**Figure 20: Proportion of FBOs that faced challenges with the 2014 legislation, by sector**




Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category. Note a low base size of 30 fishmongers.

Challenges with the 2014 legislation were more prevalent among sites where the owner's first language was English (45%, compared with 33% among owners with a different first language). While it is potentially surprising that such businesses struggled more, this is likely due to other factors, including, for instance, that these sites were made up of a higher proportion of large businesses.

There is mixed evidence on the extent to which language barriers would impact on compliance with the legislation. For instance, qualitative findings from the 2012 report found that language barriers were not perceived to be an issue in terms of the provision of allergy information to *staff*, as in most cases the owner spoke the same language as the staff.[24] However, some stakeholders in the 2020 scoping interviews felt that language barriers could be an issue in terms of the oral provision of allergen information to *customers*.

[24] Smeaton and IFF Research (2013), p.108.

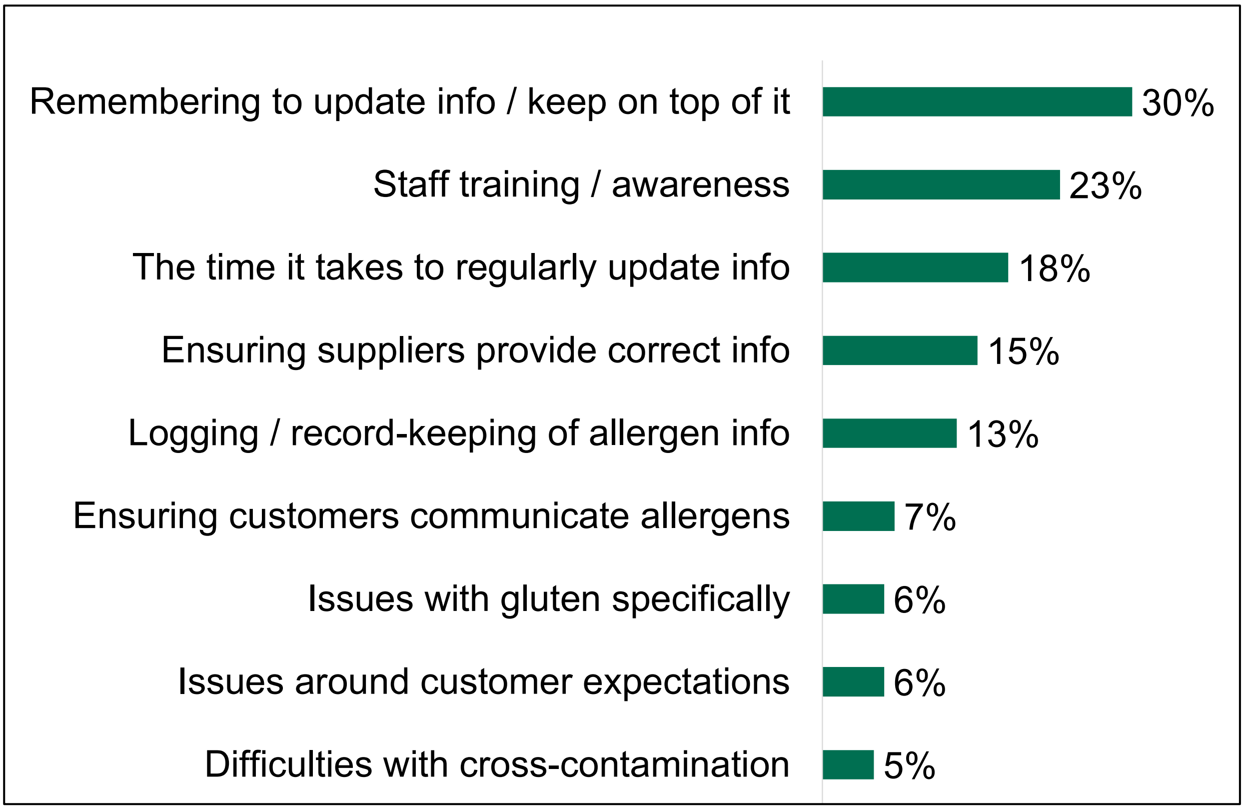
> "If you're at the level of language provision where a waiter is taking the order based on pointing at a number on a menu, there is no way you can have a safe allergy conversation because you are not going to understand their question and they are not going to understand your answer."
>
> **Policy expert**

## Types of challenges faced

This section considers the specific types of challenges faced by businesses in relation to the 2014 legislation. Results are reported based on those who had faced challenges in order to identify which issues are most pertinent to the particular subgroups who actually face them. Subgroups differences reported here are therefore not necessarily reflective of the wider FBO population, as some sectors were less likely to face any challenges as described above.

Figure 21 shows the main challenges FBOs faced in terms of the 2014 legislation, the most common of which, was remembering to update allergens information (30%). This challenge was particularly acute among takeaway restaurants (51%) despite the overall proportion of restaurants and cafes mentioning this being in line with the average (31%).

**Figure 21: Challenges faced by businesses in relation to the 2014 legislation (unprompted)**



Base: All FBOs that faced challenges with the 2014 legislation (1,050). Results shown for challenges mentioned by five per cent of respondents or more.

Approaching a quarter of FBOs that faced challenges mentioned issues relating to staff training and awareness (23%), although this varied by size. FBOs with five or more employees were more likely to report this than those with fewer than five employees (25% vs 17%). By sector, those operating in general retail who faced challenges were twice as likely than average (45%) to report staff training and awareness as a challenge.

The third most common challenge faced was the time it takes to regularly update information on menus or labels (18%). Although generally there were few national differences in terms of challenges faced, this particular issue was more prevalent in Scotland and Wales (28% and 27% respectively) and mentioned far less by English FBOs (16%). This challenge was also more common among FBOs with between 5 and 10 employees (24%).

Butchers were more likely to mention various challenges around managing allergens information, including remembering to update it (45% vs 30% average) and the time it takes to update (34% vs. 18%), and more generally keeping a record of this information for their products (32% vs. 13%).

Issues around record-keeping were also of relatively high concern among caterers (20% vs. 13%), with particular challenges around ensuring suppliers provide the correct information (23% vs. 15% average). They were less likely to face challenges concerning staff training (9% vs 23% average).

## Motivations for complying with allergens legislation

When asked what motivates compliance with food allergen information requirements more generally, the most common response from businesses was the desire to keep customers safe. These businesses recognised the provision of information about ingredients to their customers to be the 'right thing to do' in terms of providing maximum information about products. In addition to keeping customers safe, some businesses said that potential enforcement action for non-compliant behaviour was a key motivation, particularly the prospect of fines and criminal prosecution.

> "I don't want anybody to get poorly at the end of the day and I'd rather be on top of the regulations, so I know that whatever I'm providing is safe for everybody."
>
> **Caterer, 1-4 staff**

"I think [fines and imprisonment], that's probably why as a store manager you make sure that your staff know exactly what they're doing."

**Restaurant / Cafe, 11+ staff**

# Awareness and perceptions of the 2021 Food Information Amendment

**Current labelling practices for PPDS foods**

- Four in every five FBOs selling PPDS foods (78%) currently label all of the allergenic ingredients on PPDS foods; and three in five (62%) label *all* ingredients.
- Retailers were more likely than those operating in catering sectors to label all allergenic ingredients (84% vs. 72%).

**Awareness of the amendment and potential challenges**

- Three in five (59%) FBOs were aware of the food information amendment for PPDS foods, rising to 79% of businesses that *only* sold PPDS foods.
- The majority of FBOs (79%) felt that complying with the new amendment would be easy. By size, larger FBOs with 11 or more employees were most likely to say it would be easy to comply (84%).
- Reasons given for expecting compliance to be easy in follow-up interviews included already having labelling processes in place, having a limited PPDS product range or because the changes would be dealt with by head office. For many, the 2021 amendment felt less of a 'step change' than the 2014 legislation.
- Those who felt complying would be difficult expected the main challenges to be the time it would take to introduce and update labelling (51%) and ensuring that the correct labelling is used (44%).

**Types of information that would help FBOs to comply**

- The most popular types of guidance that FBOs felt would help them comply with the new amendment were online documents and guidance (90%); hard copy booklets or documents (85%) and online videos (82%).
- However, results suggest FBOs would like a package of resources, with seven in ten (70%) selecting at least five out of seven potential formats as helpful.

## Background to the amendment and the current labelling practices

The previous chapters have explored how businesses communicate allergens information to customers for non-prepacked foods in accordance with food information legislation introduced in 2014. These rules, however, do not require the labelling of foods packaged on the same premises from which they are sold i.e. PPDS.

To address this, an amendment to the current food information regulations, will come into force in October 2021. It will require full ingredients labelling to be provided for PPDS foods. This brings the requirements for PPDS food more in line with the requirements already in existence for prepacked food.

While there is no current clear legislative definition of PPDS, the FSA interpretation is that this applies to foods that have been packed before being offered for sale by the same food business on the same premises from which they are being sold to the consumer. This might, for instance, include foods such as meat pies and sandwiches sold from the same premises in which they are made.[25] At the time of the interviews being undertaken this interpretation was in use by the FSA, and at the time of writing this report, further refinement of an equivalent FSS interpretation to be used in Scotland is in development. In light of the introduction of the food information amendment, the survey explored FBOs' current labelling practices for PPDS foods; awareness of the amendment; challenges businesses expect to face in implementing the changes required to comply; and the types of information that might help support businesses in complying.

There were notable differences between FBOs selling PPDS foods and the wider FBO population in terms of their sectoral composition. Retailers make up a far larger share of FBOs selling PPDS foods (47% vs 13% of all FBOs selling non-prepacked foods), mainly driven by a far higher proportion of general retail businesses (27% vs. 6%). In contrast, while 70% of all FBOs operate in the catering sectors, this was true of less than half (45%) of FBOs selling PPDS foods, due to a smaller composition of restaurants (31% vs. 46% of all FBOs) and pubs and bars (1% vs. 9%). FBOs selling PPDS foods were also made up of comparatively few institutions (8% vs 17% of all FBOs). These differences in sector profile are illustrated in Figure 22.

Beyond these sectoral differences, FBOs selling PPDS foods were also more likely to be chains (46% vs 33% among all FBOs).

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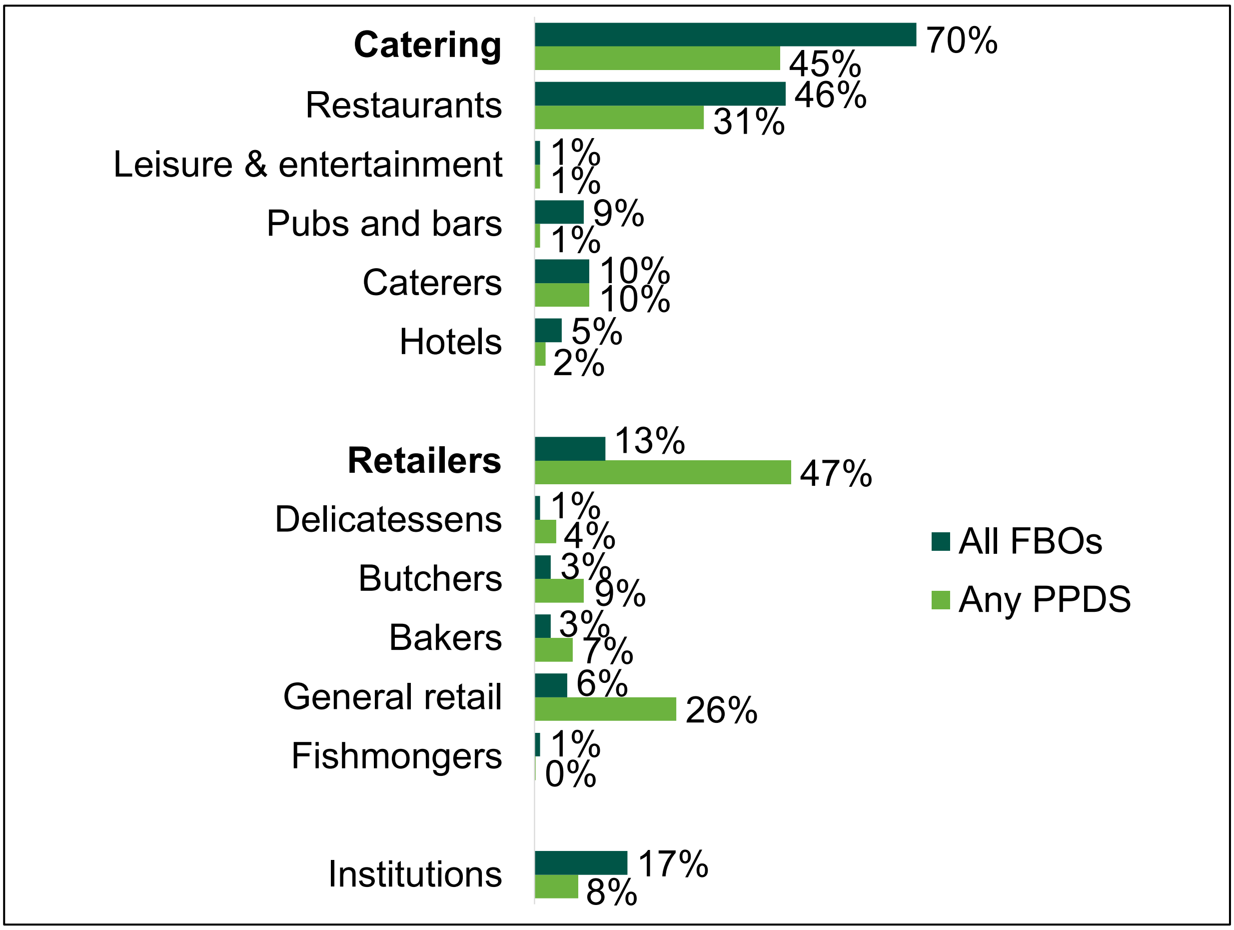
[25] More information on the new legislation for PPDS foods can be found on the FSA website.

**Figure 22: Comparison of sector profile of FBOs selling PPDS vs all FBOs**

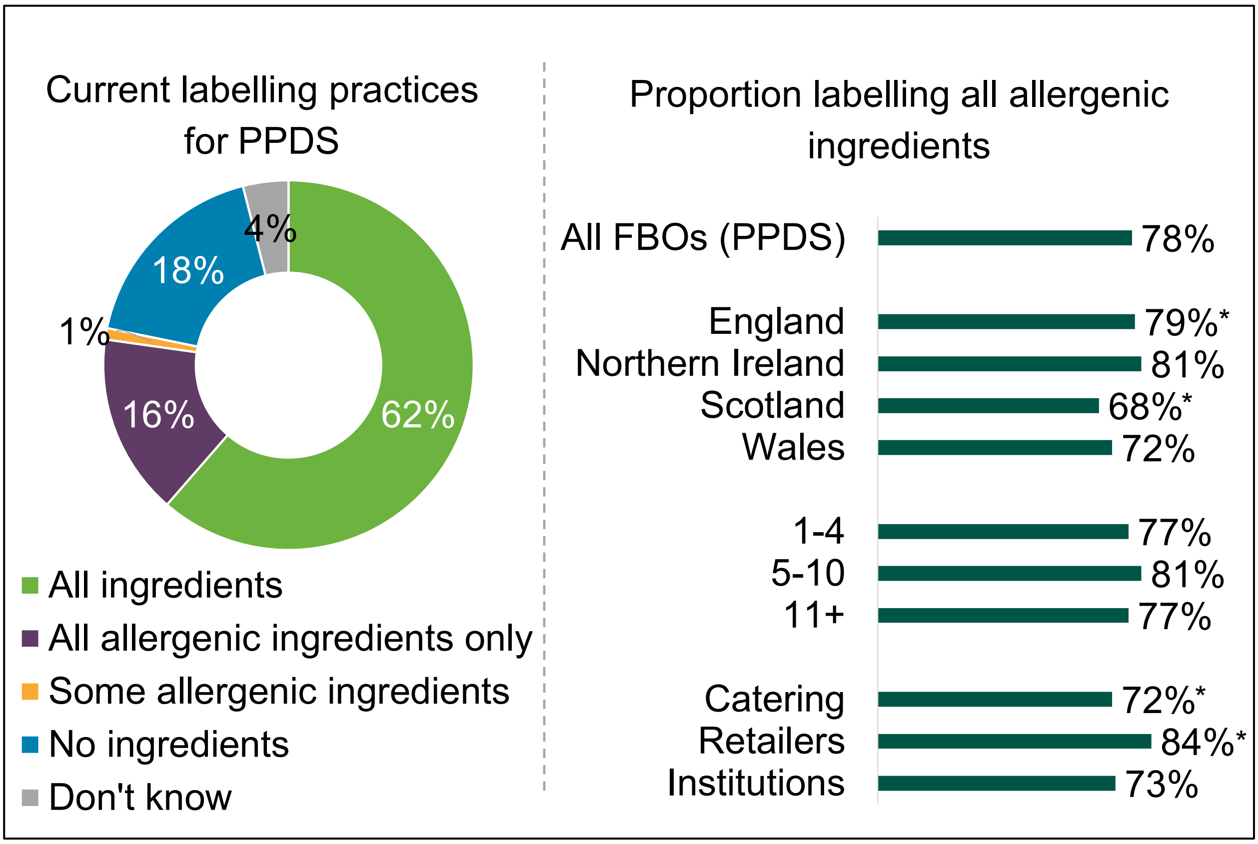



Base: All FBOs selling PPDS foods (510); All FBOs (2,303). See Tables A.1 and A.4 in Appendix A for sector base sizes

Encouragingly, around four in every five FBOs selling PPDS foods (78%) said they currently label all of the allergenic ingredients on packaging for these foods. Three in five (62%) listed all ingredients whether they were allergenic or not. These results suggest that most FBOs would be compliant with the amendment without needing to change their current labelling practices. Only one per cent of these FBOs said they only labelled some of their allergenic ingredients, while 18% had no ingredients labelling.

Results varied by nation. In England and Northern Ireland, around eight in ten FBOs selling PPDS foods (79% and 81% respectively) labelled all allergenic ingredients, whereas in Scotland this figure was closer to seven in ten (68%).[26] By sector, retailers (84%) were more likely than catering sectors (72%) and institutions (73%) to label all allergenic ingredients. Among the catering sector, restaurants and cafes in particular were less likely to label all allergenic ingredients (71%).

**Figure 23: Current labelling practices for PPDS foods, and the proportion labelling all allergenic ingredients, by country, size and sector**




Base: All FBOs selling PPDS foods (510). See Table A.4 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

In follow-up interviews, those that labelled all ingredients on their PPDS foods typically said they did so because it was considered best practice, despite being aware this went beyond current legislative requirements. These businesses felt that providing customers with full ingredients labelling enabled customers to make informed decisions at the point of purchase which, in turn, reduced the business' liability should a customer have an allergic reaction to food products.

[26] Note – in Wales, 72% of these FBOs labelled all allergenic ingredients, but this was not a statistically significant difference.

> "I think people have a right to know what's in it. I don't have any allergies, but I like to be able to make a choice."
>
> **General retail, 11+ staff**

> "So that…we're covered. If somebody buys a sandwich and they haven't looked at the ingredients when we've labelled everything, we're alright"
>
> **Caterer, 1-4 staff**

A market trader that sold PPDS foods echoed this rationale, but also explained that they had decided to start labelling all the ingredients on their packaging in preparation for the 2021 amendment.

> "For me I just thought it would be easier to have everything labelled on the packaging. I used to just have all the information with me at the stall and then just list the main allergens on there, but then I changed my packaging so I thought I might as well get it all done… I was aware of [the amendment] and had it in mind when I changed my packaging, so it was good timing for me."
>
> **Market Trader, 1-4 staff**

Those that labelled some but not all ingredients on their PPDS foods typically labelled the allergens in the product. As with many of the businesses that labelled all ingredients, they felt that labelling allergenic ingredients was best practice in terms of customer safety and business liability. However, these businesses did not feel as though they needed to take the extra step of listing all ingredients to protect customers and cover themselves. They considered the main 14 allergens to be the important ingredients to make customers aware of. One business, the school quoted below, labelled the allergens on their PPDS foods because they thought that this was required under existing allergen labelling rules.

> "It's just allergens. For instance, for an egg mayonnaise sandwich it would say contains egg, mayo and gluten. They are all made up and put on each sandwich. It wouldn't list the whole thing…it's because those are the main ones that people have an allergic reaction to. The ones that make people ill. I know you get some other ones, like mushrooms, but they're not in the top ones."
>
> **School, 5-10 staff**

Those that labelled ingredients on PPDS foods tended to use digitally printed labels. Only one business, a caterer that runs a canteen for a manufacturing business, used hand-written labels. The amount of input businesses had in the preparation of these labels varied considerably. Some designed and printed the labels themselves, others designed the labels but had them printed by sub-contractors and some did not have any involvement in label design or printing because they were provided to them by their head office or supplier. Where businesses were involved in the design of labels, they considered both the raw ingredients used and the ingredients sourced from suppliers, either by reviewing the packaging or having discussions with them.

> "All the labelling information is set up by me and it's just a case of label printing …I generate the label specification and I use software. That is where I put the recipe in and generate the labels."
>
> **Caterer, 1-4 staff**

> "The labels that we have are premade, we get them from wholesalers who sell them in bundles. Normally they just make a whole big batch. They'll do that and print what we say to be on it"
>
> **Institution, 11+ staff**

The two businesses that did not display ingredients labelling on PPDS foods (an educational institution and a baker) mentioned using alternative methods to communicate allergens information, mainly conversations with customers. The baker added that they do not list ingredients on the sandwiches they prepare as a means to save time and cut costs.

## Awareness of the amendment

Overall, 59% of FBOs were aware of the food information amendment, although this increased to 64% among those selling PPDS foods. Awareness was much higher among sites that *only* sold PPDS foods (79%, compared with 63% that sold both PPDS and loose foods). Although there is still a substantial gap in awareness of the amendment among FBOs that will eventually need to comply, the results are encouraging given that in the 2012 survey only 19% were aware of the legislation being introduced in 2014.[27]

[27] Smeaton and IFF Research (2013), p.124

When considering only those that sold PPDS foods, the catering sectors were least aware (60%) of the new amendment, driven by low levels of awareness among restaurants and cafes in particular (52%), although takeaways' awareness levels (66%) were in line with the average. Awareness was highest by sector among institutions (86%) and butchers (77%). The number of allergenic ingredients sold or served by FBOs also had some bearing on awareness levels; for instance, 57% of those with 6 or fewer allergens were aware, compared with around seven in ten (71%) of those with 10 or more allergens. There were no statistically significant differences in levels of awareness by country or size.

Although most businesses were aware of the amendment, follow-up interviews suggest that a high-level awareness of the amendment's existence does not necessarily translate to a detailed understanding of what it entails. For example, a couple of businesses that said they were aware of the amendment in the survey were unsure about the amendment when probed for further information in follow-up interviews. Furthermore, one business had misinterpreted the amendment to mean that they would need to start pre-packing the loose food products they sell.

> "It'll potentially mean we need to package up the loose products we do, so it'll probably be a bit more time-consuming."
>
> **Retail, 11+ staff**

These findings suggest that there is a need for further publicity and guidance about the changes.

## Potential challenges

After being prompted with the key details of the new food information amendment, the majority of FBOs selling PPDS foods (79%) felt that complying would be easy (38% 'very easy' and 41% 'fairly easy'). Among those who were aware of the amendment prior to interview, who possibly have a greater idea of what it takes to comply, there was little difference in the proportion perceiving it would be easy to comply (77%). In comparison, the 2012 survey found that only around half (52%) of FBOs aware of the upcoming 2014 legislation thought it would be easy to comply.[28] Using this as a benchmark, the 2019 results suggest that businesses are better positioned to cope with the latest amendment.

[28] Idem, p.126

The view among the majority of FBOs that it would be easy to comply with the food information amendment was not shared by key stakeholders in the scoping element of this study. In particular, they felt that smaller FBOs lacked the resources to keep on top of changes to ingredients (a requirement under the current legislation) and would struggle further with the costs incurred by being required to label PPDS foods. They also felt that a lack of understanding around the scope of the legislation could be dangerous if consumers were given false assurances regarding allergens.

> "The subjective nature of [what is] in and out of scope makes a huge difference. If that is misunderstood, someone may not be providing the right ingredients or an ingredients list at all. With ingredients lists becoming more common on non-prepacked foods, or prepacked for direct sale foods, I think it could give more false security to consumers that those foods are allergy-free – that's an assumption that shouldn't be made."
>
> **Industry representative**

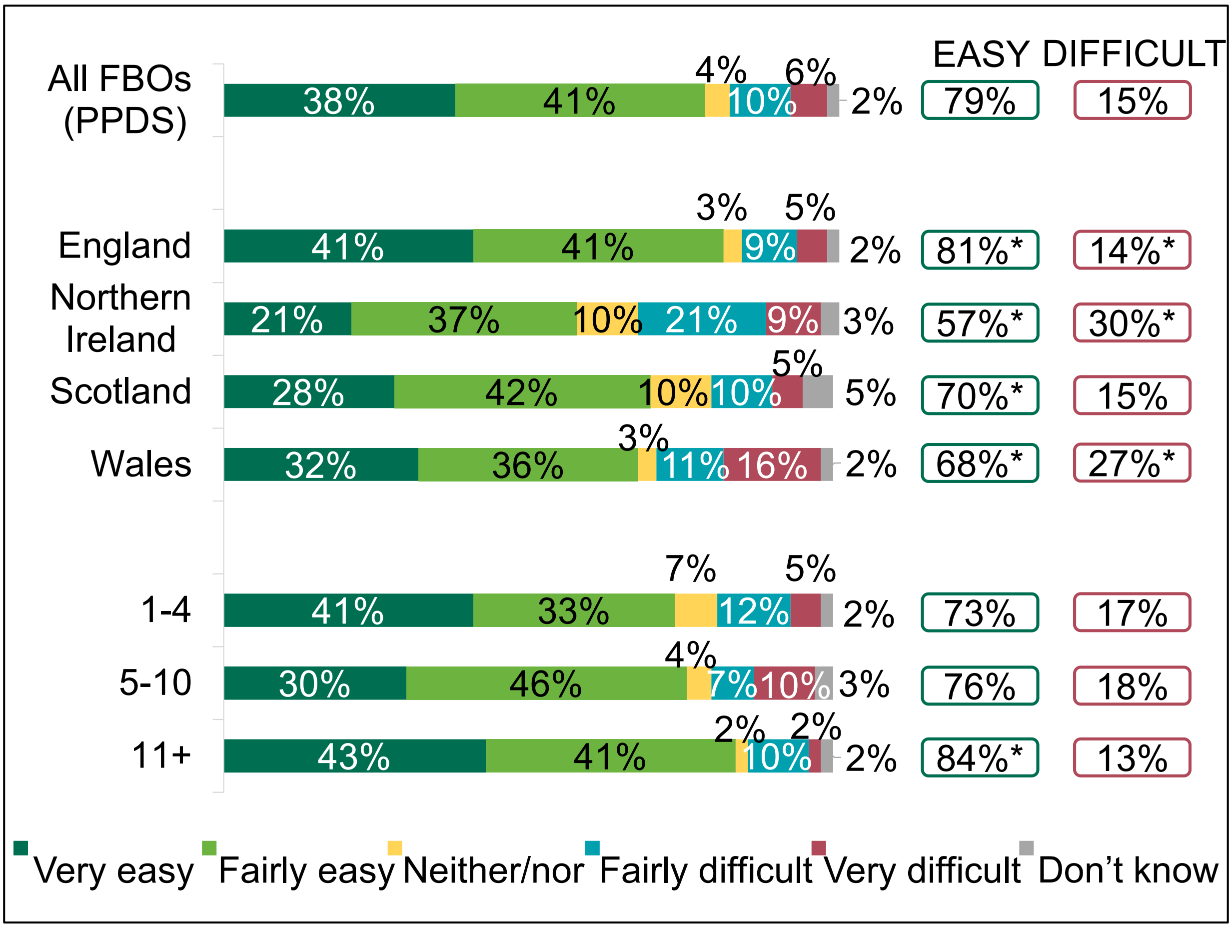
Views on how easy it would be to comply in the survey varied substantially by nation. FBOs in England were most likely to think it would be easy (81% overall, 41% very easy). In contrast, this was only reported by around seven in ten FBOs in Scotland (70%) and Wales (68%) and three in five FBOs (57%) in Northern Ireland.[29]

In terms of size, despite larger firms with 11 or more employees being more likely to have faced challenges with the 2014 legislation, they were most optimistic about how easy it would be to comply with the new amendment; 84% felt it would be easy (43% 'very easy'), compared with three-quarters (75%) of those with fewer than 11 employees. Chains were more likely to think it would be easy to comply than independent sites (84% and 75% respectively).

Views regarding the ease of compliance also varied by specific sector; general retail FBOs were particularly likely to say it would be easy to comply (90%), whereas the proportion reporting this was relatively low among butchers and institutions (60% and 68% respectively).

[29] At the time the survey was conducted, in Scotland this amendment was still proposed. At the time of writing the legislation has not yet been made.

**Figure 24: Perceived easy / difficulty of complying with the PPDS amendment**




Base: All FBOs selling PPDS foods (510). See Table A.4 in Appendix A for subgroup base sizes. For presentational purposes, statistically significant differences are only marked with an asterisk for the 'easy' and 'difficult' net percentages. Note, individual responses may not sum to 100% due to rounding.

Follow-up interviews found that most businesses that felt it would be easy to comply with the PPDS amendment said this because they felt it would involve very little change to their internal processes. These businesses typically already labelled some or all ingredients on their PPDS foods and, in some cases, had a limited range of PPDS foods. Therefore, the requirement to include all ingredients was considered a relatively straightforward task.

> "It's just that initial set-up, more admin really. But if it's law then we have got to do it haven't we?…It would probably be a couple of hours work."
>
> **School, 5-10 staff**

> "We're doing most of it already and I think as a business we're getting used to these sorts of changes.  Everyone is drilled into being careful with products and not mixing stuff, so I think it won't be much of an adjustment from there to the next step."

**General retail, 11+ staff**

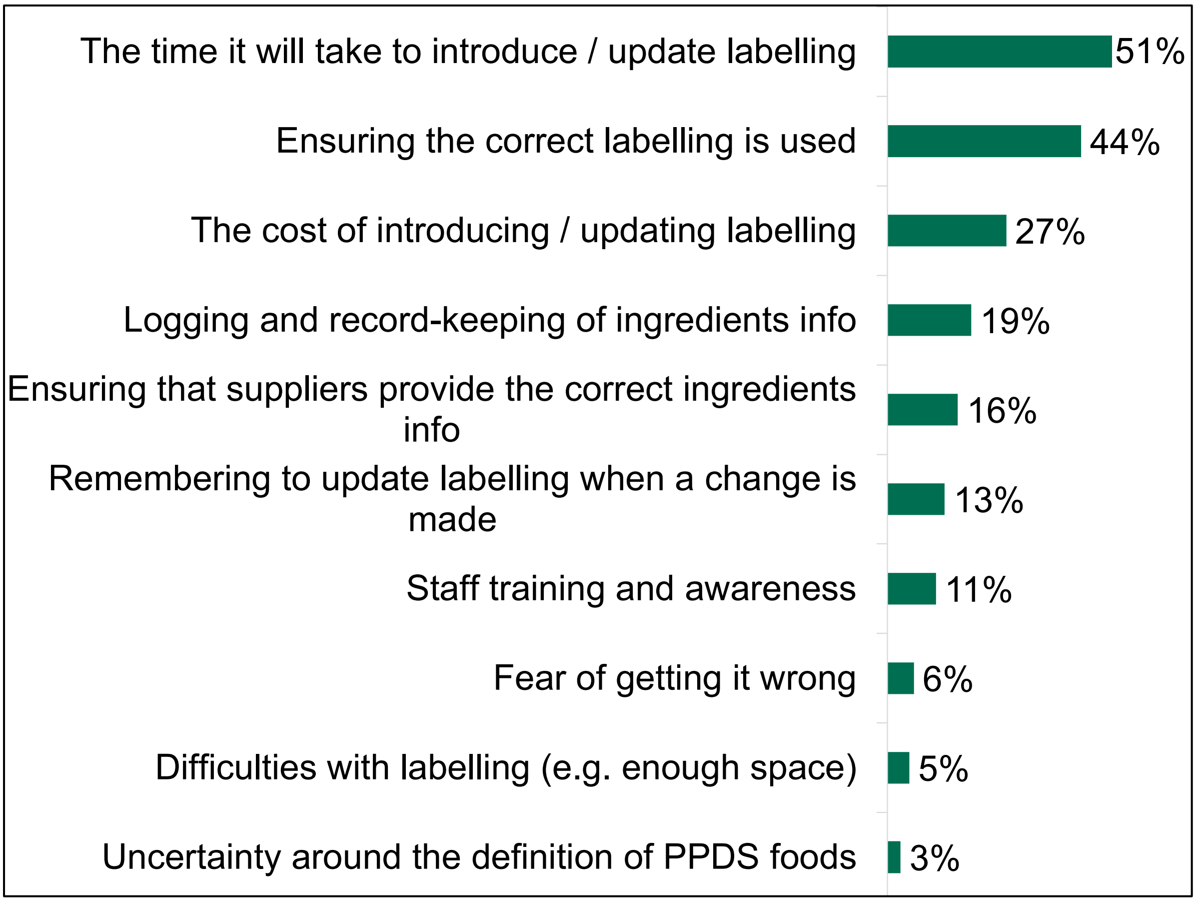
A few businesses, including a café and a butcher that were both part of chains, said that they expected compliance with the PPDS amendment to be easy as they expected their head office to look after the necessary changes. The head office was already responsible for designing and supplying labels for other products and the business expected a similar process for PPDS foods.

> "As long as we have the labels provided by head office then it won't be difficult at all. If that's already pre-printed for us in the morning when we are making those boxes, then all we need to do is apply the right sticker to the right box, which isn't very difficult."

**Restaurant / Cafe, 11+ staff**

Figure 25 shows the main challenges expected in relation to the new PPDS amendment among survey respondents that thought compliance would be difficult. The main anticipated challenges mentioned by FBOs were the time it was expected to take to introduce and update labelling for PPDS foods (51%) and ensuring the correct labelling is used (44%). Other relatively common challenges mentioned included the costs incurred as a result of introducing and updating labelling (27%), challenges associated with keeping a log of ingredients information (19%) and ensuring that suppliers provide the correct ingredients information (16%).

**Figure 25: Challenges FBOs expect to face in relation to the new PPDS regulations (unprompted)**




All FBOs selling PPDS foods that expect complying with new regulations to be difficult (98). Results are shown where mentioned by three per cent of respondents or more.

The potential challenges around complying with the new amendment were explored further in follow-up interviews. Reflecting the results from the quantitative survey, some businesses expected to face challenges in terms of the time it would take for them to update or introduce labels to their PPDS foods. For example, a few businesses explained how they will need to dedicate time to looking up the ingredients sourced from suppliers and redesigning their labels to fit the relevant information. However, most did not expect it to be a long-term challenge nor a task that would pose significant difficulty.

> "It's going to be hard work to start off with. It'll be very time consuming going through everything… I think once all that is done, it should be alright."
>
> **Caterer, 1-4 staff**

Similarly, some businesses felt that financial implications would likely be short-term and occur primarily during the initial set-up phase. However, a few businesses that did not currently label any ingredients on their PPDS foods and / or had a high volume of different types of PPDS foods felt the cost impacts of introducing compliant labels would be more severe.

> "Maybe just increased costs with providing the labels. For example, in my fridge at the moment I have 15 varieties of take-away box, so if I needed to put a specific label on each one of those, and I maybe make say 100 take-away boxes a day, I'd need to provide 100 labels a day, so it would be a cost with regards to the printing of the label."
>
> **Restaurant / Cafe, 11+ staff**
>
> "Realistically that's a double label, and so a double label for 20 varieties of sandwiches will cost me an absolute fortune… For the FSA to make Sainsbury's do this is an inconvenience. For them to make me do this is a game changer."
>
> **Caterer, sole trader**

When thinking about how the PPDS amendment compares to the legislation introduced in 2014, most businesses said they expected compliance with the PPDS amendment to be more straightforward. The 2014 legislation was seen as a bigger step change, which prompted food businesses to make considerable changes to their processes and controls, and improved practices within the industry. In comparison, the PPDS amendment was therefore seen as a much smaller change involving a comparatively small amount of work.

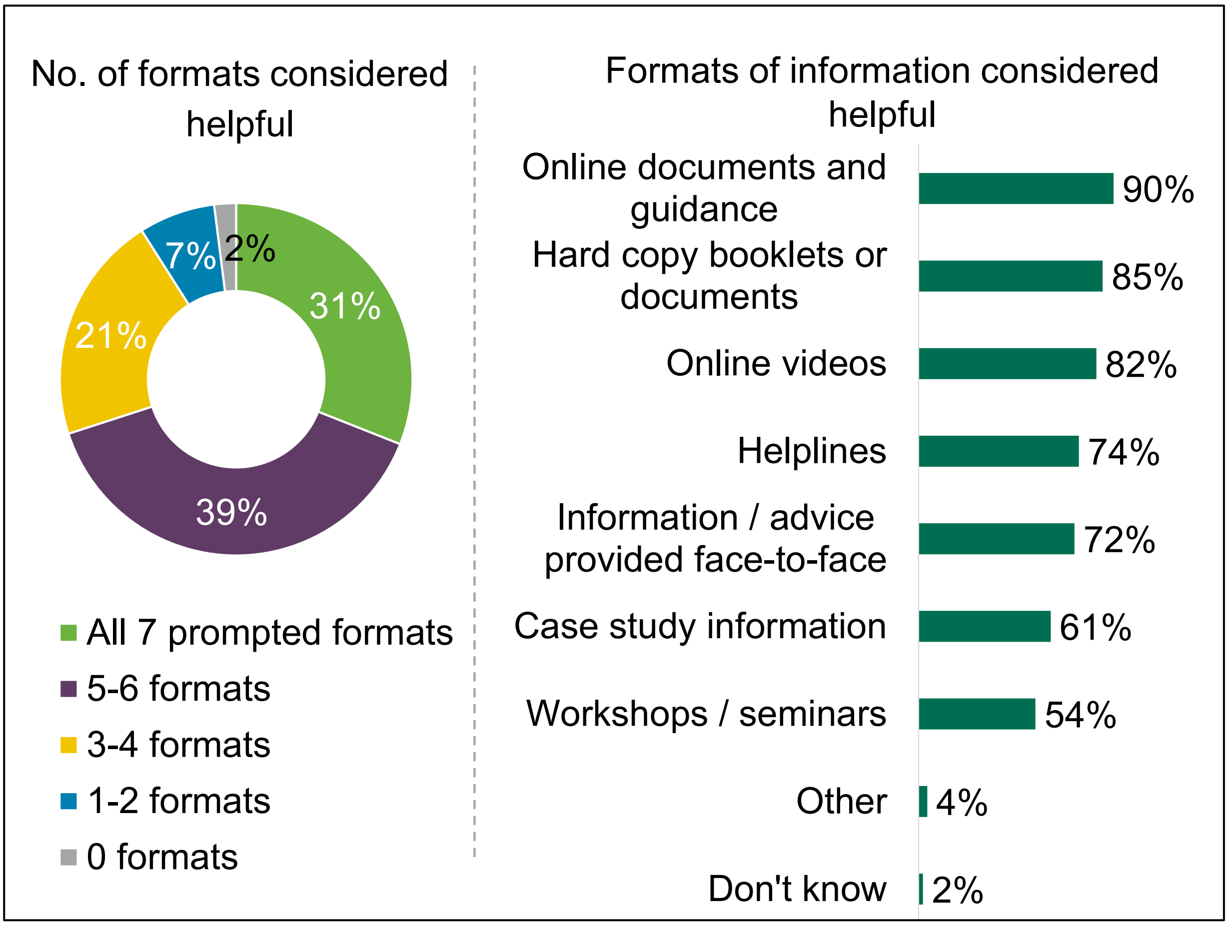
> "Compared to [the 2014 changes] I think it will be pretty straightforward. That seemed like a much bigger step back then and now it's just building on from that so I think people will be quite receptive to it and it'll be quite easy to do."
>
> **General retail, 5-10 staff**
>
> "I think [the 2021 amendment will be] easier because, similar to our business, some other businesses already started doing more intensive labelling anyway based on the 2014 legislation."
>
> **Caterer, 11+ staff**

## Types and sources of information that would help with compliance

FBOs in the survey were prompted with a list of seven potential formats for accessing information about the PPDS amendment and asked which of them might help them prepare. Results are shown in Figure 26. The majority of FBOs said that each of the prompted formats would be helpful; in fact, seven in ten (70%) selected at least five of the seven formats and three in ten (31%) selected *all* of them. These results indicate that FSA, FSS and its partners will need to make a diverse package of resources available to FBOs on the new/proposed amendment.

The most popular type of guidance, mentioned by nine in every ten FBOs selling PPDS foods (90%), was online documents and guidance. Hard copy booklets or documents (85%), online videos (82%) and helplines (74%) were each mentioned by around three-quarters of FBOs or more. Whilst still considered helpful among the majority of FBOs, workshops and seminars, and case study information were relatively less popular (54% and 61% respectively).

**Figure 26: Formats of information considered helpful by FBOs in preparing them for the new PPDS regulations (prompted)**




Base: All FBOs selling PPDS foods (510).

The level of demand for specific information formats varied by country. For instance, while receiving information or advice face-to-face was relatively less popular overall (72%), it was in higher demand in Wales (82%). FBOs in Northern Ireland and Wales were also both more likely than average to consider workshops and seminars a useful source of information (73% and 69% respectively). By size, those employing between five and ten employees found fewer types of information helpful; three in five (61%) selected five or more of the prompted formats helpful, compared with seven in ten overall (70%). In particular, they were less likely to consider helplines (68%) and workshops and seminars (45%) helpful.

The catering sectors found a greater breadth of information types useful than retailers; more than three-quarters (77%) selected at least five out of seven of the prompted formats useful compared with around two-thirds of retailers (63%). The catering sectors were more likely than retailers to find each channel of information helpful, with the exception of hard copy booklets and information or advice provided face-to-face, where a similar proportion of catering sectors and retailers found these formats helpful.

It is important to consider different preferences among particular sectors to understand how guidance might need to be tailored to meet their needs. The majority of differences were found among bakers and restaurants and cafes. Bakers selected relatively few information formats as being helpful (29% selected fewer than three formats, compared with 10% on average), whereas the vast majority of restaurants preferred a diverse range of formats (81% selected at least five formats, compared with 70% on average).

**Table 10: Formats of information considered helpful by FBOs in preparing them for the new PPDS regulations, by size, sector and country**

| Survey group | Online documents and guidance | Hard copy booklets and documents | Online videos | Helplines | Information and advice provided face-to-face | Case study information | Workshops & seminars | 5+ information types |
|---|---|---|---|---|---|---|---|---|
| Total | **90%** | **85%** | **82%** | **74%** | **72%** | **61%** | **54%** | **70%** |
| England | 91% | 85% | 82% | 74% | 71% | 62% | 53% | 69% |
| Northern Ireland | 89% | 82% | 84% | 78% | 78% | 60% | 73%* | 77% |
| Scotland | 87% | 82% | 76% | 75% | 74% | 51%* | 53% | 66% |
| Wales | 91% | 84% | 83% | 74% | 82%* | 64% | 69%* | 76% |
| Size 1-4 | 91% | 84% | 81% | 80% | 72% | 58% | 58% | 72% |
| Size 5-10 | 89% | 89% | 79% | 68%* | 75% | 60% | 45%* | 61%* |
| Size 11+ | 91% | 83% | 84% | 75% | 70% | 63% | 60%* | 75% |
| Catering | 95%* | 85% | 89%* | 80%* | 72% | 69%* | 61%* | 77% |
| Retailers | 87%* | 84% | 75%* | 68%* | 71% | 53%* | 48%* | 63% |
| Institutions | 88% | 87% | 82% | 75% | 80% | 62% | 55% | 67% |

Base: All FBOS selling PPDS foods (510). See Table A.4 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Despite several formats being less popular among bakers, in most cases the majority still found each format helpful. The exception to this was case study information; only around a third (35%) of bakers said they would find this helpful in preparing for the amendment, compared with three in five FBOs on average. On the other hand, restaurants were more likely to find several of the prompted formats helpful, including online videos (93% vs. 82% on average); helplines (83% vs. 74%); case study information (73% vs. 61%); and workshops and seminars (68% vs. 54%).

When the types and sources of information that would help with compliance were discussed during follow-up interviews, some businesses said that they did not need any. These businesses already felt adequately prepared for the PPDS amendment due to information they had received from the FSA, their head office and other organisations (e.g. Local Authorities and Trading Standards).

When asked what, if any, information they would like about the amendment, most said they would like guidance documents available online or in hard copy for staff to use. Some stated that both online and hard copy resources would be helpful. Businesses felt these documents should outline what the PPDS amendment means in simple terms, including what food products are relevant and what information labels should include. Most felt that this guidance should be provided by the FSA / FSS, or by local authorities.

> "There needs to be simple guidance that can be clearly understood. It's down to FSA, the councils and EHO to provide the information."
>
> **Caterer, 11+ staff**

> "Something on [the Local Authority] website so that if you were unsure about anything you could get a bit of support by looking at this."
>
> **School, 5-10 staff**

In addition to hard copy guidance for staff use, one business suggested that hard copy guidance for customers would also be helpful. They felt that it was important that the public be made aware of the changes to labelling on PPDS foods as the additional information is intended for them.

Examples or templates of compliant labels were also considered a potentially helpful tool by some businesses, in order to help them better understand the changes they will need to carry out and to provide them with reassurance that they are following correct procedures.

> "The best thing would be a template really of how the Food Standards Agency want labels set out."
>
> **Caterer, 1-4 staff**

# Market Traders

**Policies on allergen labelling**

- The vast majority of market traders (93%) had a policy on allergen labelling in place, an increase from 57% in 2012. For 78% this was written and for 15% this was informal.

**Provision of allergen information to consumers**

- All market traders provided allergen information to their customers; the vast majority (95%) provided information both verbally and through written methods. Most prompted methods had increased in use since 2012.
- Nearly all (94%) market traders show all allergenic ingredients on the packaging of the PPDS foods they sell.

**Business processes and staff training**

- Most market traders had read documentation or guidance on food allergen labelling (85%), an increase from 2012 (54%). Just over half of market traders had received formal training on food allergens (51%), an increase from 2012 (32%).

**Providing staff with allergen information**

- Most market traders provided staff with information in one of the prompted ways listed (89%), most likely through verbal training (71%) or formal training for all new staff (69%).

**Awareness and perceptions of the 2021 amendment**

- Just over half of the market traders in this survey were aware of the new/proposed PPDS food information amendment (56%) before taking part in this survey.
- Nearly all market traders selling PPDS foods thought that complying with the new amendment will be easy (94%) and would most like to receive support through online documents and guidance (94%).

Mirroring the broad approach taken in 2012, further to the main survey of food businesses, 55 interviews were conducted with market stalls and mobile food vans. Interviews were conducted with market traders from ten markets across the UK. Previously these interviews were limited to businesses within England. These findings are not weighted due to the lack of available population information and therefore no direct comparisons have been made to the main weighted survey findings.

'Market traders' refer to owners and employees of both market stall and mobile food van businesses.

In this chapter we also present key findings from 2012; however, caution must be taken when making any comparisons due to the low number of total interviews achieved and the fact that data has not been weighted.[30]

## The current provision of allergen information

### Policies on allergen labelling within the business

The vast majority of market traders (93%) had a policy on allergen labelling within their business. For most this policy was written (78%), for a minority this policy was informal (15%). This is an increase from 2012, where just over half of market traders had a policy on allergen labelling (57%, 25% written and 32% informal).

For most (12 of the 15 answering) market traders that had a written or informal policy on allergen labelling, and whose stall or van was part of a larger business, the owner or stall/van manager was responsible for designing the policy. For two market traders the larger business that employs them/head office had responsibility for designing the policy, though one of these market traders reported that implementing this policy is managed at site level (the other market trader did not know who was responsible for implementing the policy). One market trader reported that their local authority was responsible for designing their allergen labelling policy.

Of the three market traders that had no policy on allergen labelling, one reported it was because customers were notified of allergens in other ways, whereas two market traders did not know why they had no policy.

### Provision of information on the 14 main allergens

The majority of market traders sold or served foods containing gluten (82%), milk (65%) and eggs (60%). Other reasonably common allergens sold within the 14 included mustard (44%), soybeans (40%), other nuts (38%), sesame seeds (38%), celery (35%) and peanuts (27%). Selling or serving food containing crustaceans

[30] Where base sizes are below 30, the results are reported as numbers rather than as a percentage.

(18%), fish (18%) and sulphur dioxide (16%) was less common. Two market traders sold or served foods containing lupin (9%) and one molluscs (4%).

Most market traders provided written or verbal information on all allergens sold or served in their foods (78%).

The small number of market traders that sold food containing crustaceans, molluscs, fish and lupin labelled their foods for these allergens. Most who sold or served food containing the remaining allergens provided information on these:

- Eggs (97%), gluten (96%), mustard (23 out of 24), sesame seeds (20 out of 21), celery (18 out of 19), milk (94%), soybeans (20 out of 22), other nuts (19 out of 21), peanuts (13 out of 15) and sulphur dioxide (7 out of 9).

### Methods used to provide allergen information to customers

All market traders provided allergen information to their customers; the vast majority (95%) provided information both verbally and through written methods. Three market traders used only verbal methods and none used only written methods.

In terms of the specific methods used to communicate information on allergens, the majority of market traders provided information on posters (67%); had signs or stickers asking customers to tell them if they have an allergy or intolerance (67%); provided information on labels on or adjacent to their products (62%); provided a separate booklet/leaflet on request (56%); or provided this information on packaging prepared in-house (51%). Four in ten provided this information on menus (40%).

Most prompted methods had increased in use since 2012, such as posters (67% compared to 27%), labels on or adjacent to products (62% compared to 43%), booklet or leaflets provided on request (56% compared to 20%) and packaging prepared in-house (51% compared to 25%).

### Precautionary advice warnings

Slightly more than two-fifths of market traders used precautionary advice warnings on their foods, such as 'may contain' labelling (44%), an increase from one fifth (21%) in 2012.[31] Fewer used 'free from' labelling (18%), a proportion which has remained steady from 14% in 2012.

[31] In the 2012 survey FBOs were asked specifically whether they used 'may contain' labelling. In the 2020 survey FBOs were asked about whether they used precautionary labelling, such as 'may contain' labelling. This change was made to cover variations in the wording of precautionary labelling.

## Communication of allergy information

Most (87%) market traders that provided allergy information reviewed their communication methods or updated allergy information on written labels or menus every time menus or products changed. Of the six market traders that did not, four said this was because they sold or served food that never changes, two did not use labels and one market trader reported that their menu changed too often and that their product was made to order.

All market traders had a system in place to check whether a product contains an allergenic ingredient. Almost half reported that the staff check a handbook or allergenic information sheet (49%). It was also relatively common to ask the chef (29%), while a quarter (24%) simply mentioned staff being aware of what allergens the products contain. A fifth (20%) said everything is labelled for the customer to see and 15% retained ingredient information for all products used in the preparation of food.

## Checking or auditing ingredients from suppliers or wholesalers

Most market traders checked or audited ingredients from suppliers and wholesalers (89%). Three quarters (75%) of market traders always checked ingredients and 15% sometimes checked. Four market traders (7%) reported never checking ingredients from suppliers or wholesalers.

Carrying out these checks or audits is now more common than in 2012, when a considerably higher proportion of market traders had never done this (36% compared to 7% in 2020). The proportion of market traders that always check ingredients has increased from 50% in 2012.

Of those that checked or audited ingredients from suppliers or wholesalers, most recorded this information in hard copy at the stall or van for use by staff (55%), while some recorded it electronically (20%), kept packaging/labels (14%) or updated labelling and written information displayed to customers (12%). Eight market traders (16%) reported that they do not record this information at all.

Compared to 2012, market traders were less likely to not record information on ingredients from suppliers or wholesalers (16% compared to 39%) and were more much more likely to record information in hard copy (55% compared to 25%).

## Business processes and staff training

### Documentation and guidance on allergen labelling

Most market traders had read documentation or guidance on food allergen labelling (85%), an increase from 2012 (54%).

The FSA was the most popular source used (30%, compared to 10% in 2012), followed by local authorities (including TSOs / Enforcement Officers) (28%), training courses (provider unknown, 19%), internet (website unknown, 17%) and other external providers (15%).

### Formal training on allergens

Just over half of market traders had received formal training on food allergens (51%). This was most commonly provided by college or education institutes (8 out of 28 answering), employers (6), private provision/consultants (5), local authorities (4), or from industry bodies/trade organisations (3). Two market traders had received formal training online.

The proportion of market traders that had received training increased from 2012 (from 32%).

### Awareness of FSA / FSS resources on allergen information

Most market traders (89%) were aware of at least one type of FSA or FSS website resource from those they were prompted with in the survey, and almost seven in ten (69%) were aware of three or more resources.

Awareness was highest for advice or guidance webpages (84%), followed by the FSA's food allergen labelling and information requirements technical guidance (75%). Over half were aware of posters (55%), menu grids or templates (53%) and e-training on allergens (51%), and just under half were aware of the recipe sheets (45%).

### Use of FSA / FSS resources on allergen information

Six in ten market traders had used FSA's technical guidance or advice or guidance webpages (each by 60%) making them the most common resources used. Three in ten (31%) had used menu grids or templates and around a quarter or fewer had used posters (27%), e-training on allergens (24%) and recipe sheets (22%). A fifth (20%) of market traders had not used any of the prompted FSA resources.

Among those that had used the FSA and FSS resources, the most popular was the FSA's Technical Guidance, selected by three in ten market traders (30%). A quarter (25%) found advice or guidance webpages most useful, and slightly fewer (23%) found menu grids or templates the most useful.

**Providing staff with allergen information, including the risks of cross contamination**

Market traders were given a list of methods to provide staff with allergen information, including information on the risks of cross contamination of allergens, and asked to indicate which methods are used by their business. Most market traders provided staff with information in one of the prompted ways listed (89%). Market traders were most likely to give verbal training (71%) or provide formal training for all new staff (69%). Over half of market traders provided staff with online training (55%) and just under half provided posters around the stall (49%) or gave staff a copy of FSA's Technical Guidance (45%). Some gave a staff handbook on business procedures (42%), booklets on allergy control (40%) or information leaflets (33%).

Though the proportion of market traders that provided staff with information remained steady from 2012 (84%), some methods were now more common including posters (49% compared to 29%), booklets on allergy control (40% compared to 21%) and information leaflets (33% compared to 14%).

**Formal systems and practices to prevent cross contamination**

Most (89%) market traders had formal systems or practices in place to prevent cross contamination in relation to food allergens, an increase from 61% in 2012.

The most common systems used by market traders included separate chopping boards and utensils (49%), separate food storage (45%), separate cooking equipment such as ovens and pans (37%), separate work areas (35%), as well as routinely cleaning between preparation tasks (35%), using the correct clothing (22%) and colour coding (12%).

Compared to 2012, a lower proportion of market traders had separate work areas (35% compared to 53%), but a higher proportion routinely cleaned between preparation tasks (35% compared to 12%).

## Reflections on the 2014 food information amendment

Two-thirds (67%) of market traders reported that they had not faced any challenges associated with the 2014 legislation. Among those who reported challenges (29%), the most common challenge mentioned (by ten market traders) was remembering to update information and keep on top of it all. Logging and record keeping of products' allergy information was reported by four market traders and ensuring that suppliers provide the correct ingredients information and staff training and awareness were reported by two each.

## Awareness and perceptions of the 2021 food information amendment

### Allergenic information on PPDS foods

Market traders that sell PPDS foods were asked how much allergen information is shown on the packaging of the PPDS food they sell. Nearly all (16 out of 17 answering) market traders labelled all allergenic ingredients on the packaging of the PPDS foods they sell.

Most market traders do this for all ingredients (15) and just one market trader reported doing this for allergenic ingredients only. This suggests market traders are positioned well for the upcoming amendment.

### The new PPDS amendment

Just over half of the market traders in this survey were aware of the new/proposed PPDS food information amendment (56%) before taking part in this survey.

Nearly all market traders selling PPDS foods thought that complying with the new amendment would be easy (16 out of 17 answering); most (11) thought it would be very easy compared to fairly easy (5). No market traders selling PPDS foods felt compliance would be difficult.

Market traders selling PPDS foods were presented with a list of types of information about the new/proposed PPDS amendment that could be provided as support and were asked to indicate which might help them prepare for the upcoming changes. Online documents and guidance were thought to be the most helpful (selected by 16 market traders out of 17 answering), followed by case study information and hard copy booklets or documents (both selected by 11). The majority thought information or advice provided face to face, online videos and helplines would be helpful (all selected by 10) and six felt workshops and seminars would be helpful.

# Conclusions

Overall, the research findings show that the 2014 legislation has had a positive impact on the food industry and improved food safety for consumers. The study found that FBOs and market traders are more thorough in their approach towards providing information on allergens. Almost all FBOs (and market traders) had some form of policy in place on allergen labelling; compared with only three in five employers in 2012. Even more encouraging is that the proportion with a formal written policy on allergen labelling has doubled among FBOs. It should however be noted that behaviours and practices reported in the survey are self-reported by food businesses and do not necessarily reflect their actual behaviour.

Under the 2014 legislation, food businesses must inform consumers if any of the 14 allergens are present as ingredients or as processing aids in the non-prepacked foods they sell or serve. The vast majority of businesses reported compliant behaviour in this respect, with nine in ten FBOs and eight in ten market traders having done this for all of the allergens they sell or serve. Nevertheless, there are particular groups in the industry that have a higher risk of non-compliance; for instance, the general retail and hotel sectors were less likely to provide information about all of their allergenic foods.

A follow up study to the 2012 survey found concerns among food businesses about staff verbally communicating allergens information to consumers, given that this method relies on staff having the correct information and being able to communicate this effectively to consumers. However, there were also concerns among stakeholders that relying on written labels carries its own risks in terms of keeping information up to date. In light of these concerns, it is encouraging that the vast majority of FBOs and market traders now use both written and verbal methods of communicating allergens information and just one per cent of FBOs *only* communicate this information to customers verbally, a large decrease from one in five FBOs that reported this in 2012. Furthermore, results suggest that FBOs have suitable processes in place to ensure they are providing the correct information to consumers; virtually all FBOs and market traders were aware of where staff would need to go to find this information if asked by a consumer. In comparison, eight per cent of FBOs did not have a process or were unsure what this process was in 2012.

Auditing practices have also improved since 2012. Two-thirds of FBOs reported always checking or auditing ingredients obtained from suppliers and wholesalers, compared with around half before the legislation was introduced. This was also true of three-quarters of market traders. Despite these positive results, it still leaves a third of FBOs that do not always check ingredients and therefore risk providing incorrect information to consumers. This issue of information sharing between suppliers and businesses was commonly cited as a risk area among key stakeholders in qualitative interviews. Again, general retail businesses were more likely to demonstrate bad practice, being the only sector where a majority of businesses did not always check ingredients from suppliers and wholesalers (around two in five never had).

Staff awareness of allergen information and the businesses processes that underpin this are crucial prerequisites for being able to comply with the food information regulations, and results were again encouraging in this respect. The vast majority of FBOs and market traders had formal systems or practices in place to prevent cross-contamination and had provided their staff with allergen information, including the risks of cross-contamination. A large majority of the respondents interviewed who were responsible for food safety had also read documentation and guidance on food allergen labelling (in comparison, only half of FBOs had in 2012), which included an increase in the use of FSA documentation and guidance. The proportion of FBOs that had received formal training on food allergens also increased, and follow-up interviews suggested less formal on-the-job training was also common – and valued. There is however scope to increase the uptake of formal training, given that under half of FBOs had done this and because of possible gaps in knowledge among the workforce (with kitchen and more senior staff particularly likely to attend formal training and others relying on a 'trickle down' effect).

The FSA and FSS have a range of website resources available to help businesses comply with allergens regulations. Although most FBOs were aware of each resource, the use of recipe sheets and menu grids was still relatively low, and the majority of FBOs within the catering sectors, who are most likely to benefit from these resources, had not used them. Despite e-training on allergens and guidance webpages being the most highly regarded resources among FBOs, there was still a sizeable minority that were not aware of them. Given that there was no clear-cut winner in terms of usefulness, it is important that the FSA and FSS continue to produce and promote a range of resources.

While these findings are generally encouraging and indicative of high levels of compliance, it is important to consider whether the regulations are burdensome to FBOs in order to understand whether businesses are likely to maintain these standards. While there were mixed reflections on the 2014 legislation, the survey found that a slight majority of FBOs and around two-thirds of market traders reported facing no challenges as a result of its introduction. The industry will still need to find ways of addressing the main challenges raised, such as ensuring allergens information is up to date (and the time this takes) and staff training and awareness. The FSA, the FSS and its partners will also need to target support to sectors most acutely affected by challenges, such as the catering sector.

Interestingly, despite concerns mentioned in the follow-up study that smaller businesses would struggle to comply with the 2014 legislation due to a lack of resources, they were, in fact, less likely to have faced challenges, although results suggest they can be less diligent in certain processes; for instance, those with fewer than five employees were less likely to provide information for all allergens in foods they sold or served and were less likely to review or update the methods they use to provide this information.

Another key objective of this study was to explore awareness and views regarding upcoming legislative changes that will require FBOs to provide full ingredients labelling for PPDS foods. It is encouraging that the majority of businesses selling PPDS foods are already aware of these changes and most already provide full ingredients labelling, with follow-up interviews suggesting that this is because they consider it best practice to inform the consumer about allergens risks. This is despite the amendment not coming into force until 2021. However, results indicate that restaurants and cafes are less prepared for the changes; only a slight majority were aware of the amendment and they were also the least likely sector to currently label allergenic ingredients on their PPDS foods. This lack of preparedness, however, did not translate to concerns about being able to comply. Instead, butchers and institutions were most likely to think complying would be difficult. In terms of the challenges businesses are likely to face in relation to the 2021 food information amendment, the quantitative survey and follow-up interviews both found that, for some businesses, the time it would take to update or introduce labels was a concern. Qualitatively, however, businesses suggested this was only likely to be a short-term concern, although one that was likely to be more acute and have greater financial implications for businesses who did not currently label their PPDS foods, and who sold a large volume of different PPDS foods.

Although a large majority of FBOs selling PPDS businesses are optimistic about the ease of complying with the legislation, it is clear a diverse package of support will be needed from the FSA, FSS and its partners to facilitate preparedness, with online documents and guidance, hard copy booklets or documents, and online videos the most in demand formats. This guidance will need to specifically support businesses with the practicalities around providing correct and appropriate labelling and ensuring information remains up to date.

# Appendix A – Base size tables

**Table A.1: Unweighted base sizes for 'All FBOs'**

| Survey group | 2020 base size | 2012 base size |
|---|---|---|
| **Total** | **2,303** | **1,666** |
| England | 1,029 | 1,162 |
| Northern Ireland | 366 | 152 |
| Scotland | 463 | 198 |
| Wales | 445 | 154 |
| 1-4 | 573 | 586 |
| 5-10 | 673 | 452 |
| 11+ | 1,057 | 613 |
| **Catering** | 1,444 | 956 |
| Hotels | 124 | 62 |
| Pubs and bars | 203 | 268 |
| Leisure and Entertainment | 61 | N/A |
| Restaurants and cafes | 891 | 499 |
| Restaurants | 365 | 172 |
| Cafes | 394 | 199 |
| Takeaways | 113 | 128 |
| Caterers | 165 | 100 |
| **Retailers** | 467 | 401 |
| Butchers | 98 | 52 |
| Bakers | 101 | 50 |
| Fishmongers | 30 | 50 |
| Delicatessens | 88 | 49 |
| General retail | 150 | 200 |
| **Institutions** | 392 | 309 |
| Care homes and hospitals | 135 | 85 |

| Survey group | 2020 base size | 2012 base size |
|---|---|---|
| Pre-primary and primary education | 150 | 80 |
| Other education | 48 | 55 |
| Defence and justice | 32 | 49 |
| Other institutions | 27 | 40 |
| Chain | 784 | 479 |
| Independent site | 1,519 | 1,184 |
| Loose non-prepacked only | 1,793 | N/A |
| PPDS only | 74 | N/A |
| Both loose and PPDS foods | 436 | N/A |
| ANY PPDS | 510 | N/A |
| Owner's first language: English | 2,143 | 1,531 |
| Owner's first language: Other | 160 | 135 |

**Table A.2 Unweighted base sizes for employers selling or serving each allergen**

| Allergen sold | 2020 base size | 2012 base size |
|---|---|---|
| Gluten | 2,230 | 1,435 |
| Milk | 2,170 | 1,386 |
| Eggs | 2,116 | 1,426 |
| Fish | 1,733 | 1,175 |
| Mustard | 1,797 | 1,041 |
| Celery | 1,551 | 803 |
| Other nuts | 1,513 | 894 |
| Soybeans | 1,323 | 381 |
| Sesame seeds | 1,306 | 693 |
| Peanuts | 1,257 | 688 |
| Crustaceans | 975 | 651 |
| Lupin | 862 | 153 |
| Sulphur dioxide | 845 | 201 |
| Molluscs | 626 | 386 |

**Table A.3: Unweighted base sizes for 'FBOs that had used FSA or FSS resources'**

| Survey group | 2020 base size |
|---|---|
| Total | **1,906** |
| England | 853 |
| Northern Ireland | 298 |
| Scotland | 382 |
| Wales | 373 |
| 1-4 | 469 |
| 5-10 | 546 |
| 11+ | 891 |
| **Catering** | 1,220 |
| Hotels | 109 |
| Pubs and bars | 169 |
| Leisure and Entertainment | 52 |
| Restaurants and cafes | 749 |
| Restaurants | 304 |
| Cafes | 338 |
| Takeaways | 89 |
| Caterers | 141 |
| **Retailers** | 342 |
| Butchers | 68 |
| Bakers | 81 |
| Fishmongers | 20 |
| Delicatessens | 73 |
| General retail | 100 |
| **Institutions** | 344 |
| Care homes and hospitals | 116 |
| Pre-primary and primary education | 134 |
| Other education | 43 |
| Defence and justice | 27 |
| Other institutions | 24 |

| Survey group | 2020 base size |
|---|---|
| Chain | 616 |
| Other | 1,290 |
| Loose non-prepacked only | 1,508 |
| ANY PPDS | 398 |

**Table A.4: Unweighted base size for 'All FBOs selling PPDS foods'**

| Survey group | 2020 base size |
|---|---|
| Total | 510 |
| England | 224 |
| Northern Ireland | 79 |
| Scotland | 105 |
| Wales | 102 |
| 1-4 | 132 |
| 5-10 | 163 |
| 11+ | 215 |
| **Catering** | 173 |
| Hotels | 7 |
| Pubs and bars | 5 |
| Leisure and Entertainment | 17 |
| Restaurants and cafes | 107 |
| Restaurants | 21 |
| Cafes | 53 |
| Takeaways | 25 |
| Caterers | 37 |
| **Retailers** | 282 |
| Butchers | 60 |
| Bakers | 52 |
| Fishmongers | 18 |
| Delicatessens | 44 |
| General retail | 108 |

| Survey group | 2020 base size |
|---|---|
| **Institutions** | 55 |
| Care homes and hospitals | 11 |
| Pre-primary and primary education | 3 |
| Other education | 23 |
| Defence and justice | 6 |
| Other institutions | 12 |
| Chain | 219 |
| Other | 291 |
| English | 473 |
| Other | 37 |

# Appendix B – Selected results by specific sector

**Table B.1: Allergen labelling policy status by sector**

| Sector | Written policy | Informal policy | Any: written or informal | No policy | Don't know |
|---|---|---|---|---|---|
| **Total** | **83%** | **12%** | **95%** | **4%** | **1%** |
| **Catering** | **83%** | **13%** | **96%*** | **2%*** | **1%** |
| Hotels | 81% | 11% | 92% | 6% | 2% |
| Pubs and bars | 87% | 10% | 97% | 2% | 1% |
| Leisure and Entertainment | 77% | 13% | 91% | 9%* | 0% |
| Restaurants and cafes | 83% | 14%* | 97%* | 1%* | 1% |
| Restaurants | 88% | 10% | 98%* | <0.5%* | 2% |
| Cafes | 79%* | 18%* | 96% | 3% | 1% |
| Takeaways | 86% | 10% | 97% | 1% | 2% |
| Caterers | 83% | 11% | 95% | 4% | 1% |
| **Retailers** | **80%** | **14%** | **94%** | **6%*** | **<0.5%*** |
| Butchers | 78% | 18% | 96% | 4% | 0% |
| Bakers | 81% | 19% | 99%* | 1% | 0% |
| Fishmongers | 78% | 13% | 91% | 9% | 0% |
| Delicatessens | 69%* | 20%* | 89%* | 11%* | 0% |
| General retail | 84% | 9% | 92% | 7%* | <0.5% |
| **Institutions** | **84%** | **8%*** | **92%*** | **7%*** | **1%** |
| Care homes and hospitals | 83% | 13% | 96% | 3% | <0.5% |
| Pre-primary and primary education | 85% | 5%* | 90%* | 9%* | 1% |
| Other education | 81% | 10% | 91% | 1% | 4%* |
| Defence and justice | 84% | 13% | 98% | 2% | 0% |
| Other institutions | 100% | 0% | 100% | 0% | <0.5% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.2: Methods used to provide allergen information to consumers by sector**

| Sector | Verbally if asked | Separate booklet/leaflet available upon request | A sign or sticker asking customers to tell the business if they have an allergy or intolerance | On menus | On posters on the wall | On labels on or adjacent to your products | On packaging which you prepare in-house | On a website or app | On a delivery service website or app | Customers are asked to provide information on their allergies before they are sold food |
|---|---|---|---|---|---|---|---|---|---|---|
| **Total** | **92%** | **77%** | **77%** | **59%** | **56%** | **56%** | **34%** | **30%** | **8%** | **7%** |
| **Catering** | **91%*** | **80%*** | **81%*** | **61%*** | **54%*** | **50%*** | **29%*** | **32%*** | **11%*** | **4%*** |
| Hotels | 94% | 76% | 83% | 65% | 33%* | 41%* | 27% | 25% | 0%* | 10% |
| Pubs and bars | 88% | 83%* | 82%* | 69%* | 55% | 42%* | 24%* | 36%* | 1%* | 0%* |
| Leisure and Entertainment | 90% | 81% | 71% | 44%* | 38%* | 72%* | 38% | 12%* | 0%* | 1%* |
| Restaurants and cafes | 92% | 81%* | 82%* | 59% | 56% | 51%* | 30%* | 32%* | 15%* | 4%* |
| Restaurants | 88%* | 79% | 77% | 71%* | 54% | 43%* | 28%* | 43%* | 22%* | 8% |
| Cafes | 95%* | 83%* | 87%* | 50%* | 52% | 58% | 30%* | 20%* | 6% | 1%* |
| Takeaways | 93% | 74% | 84% | 56% | 75%* | 46%* | 33% | 43%* | 27%* | <0.5%* |
| Caterers | 89% | 75% | 76% | 65% | 55% | 55% | 30% | 28% | 7% | 5% |
| **Retailers** | **92%** | **66%*** | **69%*** | **31%*** | **49%*** | **78%*** | **57%*** | **29%** | **1%*** | **<0.5%*** |
| Butchers | 95% | 64%* | 78% | 27%* | 61% | 78%* | 67%* | 9%* | 0%* | 0%* |
| Bakers | 95% | 76% | 86%* | 40%* | 57% | 70%* | 46%* | 46%* | 2%* | 0%* |
| Fishmongers | 91% | 39%* | 47%* | 14%* | 50% | 74%* | 52%* | 6%* | 0% | 0% |

| Sector | Verbally if asked | Separate booklet/leaflet available upon request | A sign or sticker asking customers to tell the business if they have an allergy or intolerance | On menus | On posters on the wall | On labels on or adjacent to your products | On packaging which you prepare in-house | On a website or app | On a delivery service website or app | Customers are asked to provide information on their allergies before they are sold food |
|---|---|---|---|---|---|---|---|---|---|---|
| Delicatessens | 95% | 62%* | 73% | 44%* | 59% | 69%* | 55%* | 16%* | 6% | 2% |
| General retail | 89% | 65%* | 59%* | 27%* | 39%* | 84%* | 57%* | 33% | 0%* | 0%* |
| **Institutions** | **94%*** | **73%** | **63%*** | **69%*** | **69%*** | **64%*** | **39%*** | **24%*** | **0%*** | **27%*** |
| Care homes and hospitals | 94% | 81% | 61%* | 56% | 67%* | 57% | 42% | 19%* | 0%* | 22%* |
| Pre-primary and primary education | 95% | 69%* | 62%* | 74%* | 70%* | 65%* | 36% | 22%* | 0%* | 31% |
| Other education | 86% | 74% | 69% | 73%* | 68% | 72%* | 57%* | 53%* | 0%* | 14% |
| Defence and justice | 90% | 88% | 88% | 60% | 82%* | 64% | 31% | 21% | 0% | 5% |
| Other institutions | 100% | 85% | 84% | 82% | 82% | 95% | 65% | 18% | 0% | <0.5% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.3: The use of precautionary (i.e. 'may contain') and 'free from' labelling by sector**

| Survey group | Precautionary labelling | 'free from' |
|---|---|---|
| **Total** | **55%** | **31%** |
| **Catering** | **55%** | **29%*** |
| Hotels | 57% | 26% |
| Pubs and bars | 55% | 25%* |
| Leisure and Entertainment | 64% | 37% |
| Restaurants and cafes | 54% | 31% |
| Restaurants | 55% | 29% |
| Cafes | 53% | 34% |
| Takeaways | 50% | 28% |
| Caterers | 57% | 25% |
| **Retailers** | **70%*** | **32%** |
| Butchers | 59% | 24% |
| Bakers | 72%* | 27% |
| Fishmongers | 36%* | 13%* |
| Delicatessens | 57% | 29% |
| General retail | 78%* | 39%* |
| **Institutions** | **45%*** | **40%*** |
| Care homes and hospitals | 42%* | 26% |
| Pre-primary and primary education | 43%* | 45%* |
| Other education | 63% | 43% |
| Defence and justice | 53% | 19% |
| Other institutions | 96% | 50% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.4: Methods used to check for the presence of allergens, by sector**

| Sector | Staff check handbook / allergenic information sheet | Check the packaging / labels | Ask the chef | Retain ingredient information for all products | Everything is labelled | Retain all information provided by suppliers | Staff are aware of what is in the products | Staff check on supplier websites |
|---|---|---|---|---|---|---|---|---|
| **Total** | **62%** | **33%** | **25%** | **16%** | **9%** | **6%** | **5%** | **5%** |
| **Catering** | **66%*** | **30%*** | **28%*** | **16%** | **8%*** | **6%*** | **5%** | **4%** |
| Hotels | 64% | 35% | 38%* | 14% | 6% | 6% | 6% | 6% |
| Pubs and bars | 64% | 26%* | 36%* | 10%* | 7% | 4% | 5% | 3% |
| Leisure and Entertainment | 74%* | 44% | 9%* | 19% | 6% | 5% | 3% | 0% |
| Restaurants and cafes | 68%* | 30%* | 27%* | 16% | 8% | 6% | 5% | 4%* |
| Restaurants | 60% | 26%* | 42%* | 16% | 10% | 6% | 7% | 5% |
| Cafes | 73%* | 33% | 20%* | 18% | 6%* | 7% | 3% | 3%* |
| Takeaways | 72%* | 36% | 9%* | 11% | 10% | 3% | 2% | 4% |
| Caterers | 58% | 27% | 23% | 21% | 9% | 6% | 8% | 5% |
| **Retailers** | **60%** | **37%** | **7%*** | **15%** | **16%*** | **12%*** | **6%** | **5%** |
| Butchers | 49%* | 42% | 4%* | 27%* | 24%* | 20%* | 7% | 4% |
| Bakers | 73%* | 32% | 8%* | 20% | 16%* | 12%* | 6% | 3% |
| Fishmongers | 31*% | 41% | 13% | 25% | 25%* | 35%* | 18%* | 3% |
| Delicatessens | 52% | 45%* | 20% | 11% | 17%* | 3% | 5% | 2% |
| General retail | 62% | 36% | 5%* | 9%* | 11% | 9% | 4% | 6% |

| Sector | Staff check handbook / allergenic information sheet | Check the packaging / labels | Ask the chef | Retain ingredient information for all products | Everything is labelled | Retain all information provided by suppliers | Staff are aware of what is in the products | Staff check on supplier websites |
|---|---|---|---|---|---|---|---|---|
| **Institutions** | **44%*** | **45%*** | **25%** | **18%** | **10%** | **6%** | **5%** | **9%*** |
| Care homes and hospitals | 51%* | 33% | 16%* | 20% | 10% | 2%* | 0%* | 6% |
| Pre-primary and primary education | 38%* | 49%* | 27% | 18% | 10% | 7% | 6% | 11%* |
| Other education | 58% | 49%* | 31% | 14% | 9% | 8% | 8% | <0.5% |
| Defence and justice | 49% | 39% | 23% | 19% | 8% | 13% | 5% | 15%* |
| Other institutions | 96% | 62% | 32% | 15% | 16% | <0.5% | 16% | 0% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category. '**' is used where figures are less than 0.5%.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.5: Proportion of FBOs that do not always check/audit ingredients from suppliers and wholesalers, by sector**

| Sector | Do not always check/audit ingredients from suppliers and wholesalers |
|---|---|
| **Total** | **32%** |
| **Catering** | **30%*** |
| Hotels | 33% |
| Pubs and bars | 27% |
| Leisure and Entertainment | 37% |
| Restaurants and cafes | 31% |
| Restaurants | 22%* |
| Cafes | 36% |
| Takeaways | 41%* |
| Caterers | 22%* |
| **Retailers** | **43%*** |
| Butchers | 33% |
| Bakers | 33% |
| Fishmongers | 39% |
| Delicatessens | 32% |
| General retail | 53%* |
| **Institutions** | **31%** |
| Care homes and hospitals | 36% |
| Pre-primary and primary education | 30% |
| Other education | 31% |
| Defence and justice | 36% |
| Other institutions | 18% |

Base: All FBOs: 2020 (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.6: Whether FBOs had read any documentation or guidance on food allergen labelling, or had any formal training on food allergens, by sector.**

| Sector | Documentation or guidance | Formal training |
|---|---|---|
| **Total** | **83%** | **49%** |
| **Catering** | **83%** | **49%** |
| Hotels | 87% | 52% |
| Pubs and bars | 84% | 50% |
| Leisure and Entertainment | 86% | 39% |
| Restaurants and cafes | 82%* | 49% |
| Restaurants | 83% | 53% |
| Cafes | 80%* | 48% |
| Takeaways | 82% | 45% |
| Caterers | 89%* | 49% |
| **Retailers** | **84%** | **46%** |
| Butchers | 83% | 32%* |
| Bakers | 85% | 42% |
| Fishmongers | 70% | 45% |
| Delicatessens | 88% | 43% |
| General retail | 85% | 55% |
| **Institutions** | **83%** | **47%** |
| Care homes and hospitals | 88% | 43% |
| Pre-primary and primary education | 80% | 49% |
| Other education | 83% | 44% |
| Defence and justice | 83% | 82%* |
| Other institutions | 97% | 82% |

Base: All FBOs: 2020 (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.7: Awareness of FSA / FSS resources among FBOs, by sector**

| Sector | Advice or guidance webpages | Posters | FSA's Technical Guidance | E-training on allergens | Recipe sheets | Menu grids or templates |
|---|---|---|---|---|---|---|
| **Total** | **79%** | **74%** | **73%** | **65%** | **59%** | **58%** |
| **Catering** | **80%** | **75%** | **74%*** | **66%** | **61%*** | **62%*** |
| Hotels | 83% | 75% | 69% | 66% | 57% | 69%* |
| Pubs and bars | 82% | 78% | 75% | 66% | 63% | 65%* |
| Leisure and Entertainment | 76% | 71% | 68% | 56% | 57% | 60% |
| Restaurants and cafes | 79% | 74% | 73% | 66% | 61% | 60% |
| Restaurants | 80% | 77% | 76% | 74%* | 66%* | 63%* |
| Cafes | 78% | 72% | 73% | 58%* | 58% | 59% |
| Takeaways | 75% | 66%* | 63%* | 65% | 53% | 55% |
| Caterers | 84% | 78% | 81%* | 66% | 58% | 61% |
| **Retailers** | **70%*** | **61%*** | **68%*** | **52%*** | **49%*** | **43%*** |
| Butchers | 64%* | 64%* | 65% | 52%* | 56% | 46%* |
| Bakers | 80% | 64%* | 72% | 61% | 55% | 53% |
| Fishmongers | 66% | 62% | 54%* | 47%* | 52% | 45% |
| Delicatessens | 88% | 63%* | 79% | 53%* | 49% | 47%* |
| General retail | 65%* | 59%* | 66% | 49%* | 43%* | 36%* |
| **Institutions** | **83%*** | **83%*** | **71%** | **71%*** | **60%** | **57%** |
| Care homes and hospitals | 82% | 80% | 75% | 76%* | 61% | 59% |
| Pre-primary and primary education | 84% | 84%* | 69% | 69% | 59% | 55% |
| Other education | 84% | 85% | 76% | 60% | 65% | 69% |
| Defence and justice | 92% | 87% | 79% | 82%* | 60% | 56% |
| Other institutions | 81% | 79% | 52% | 79% | 61% | 45% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.8: FSA / FSS resources used by FBOs, by sector**

| Sector | Advice or guidance webpages | Posters | FSA's Technical Guidance | E-training on allergens | Recipe sheets | Menu grids or templates | Any prompted resource |
|---|---|---|---|---|---|---|---|
| **Total** | **58%** | **55%** | **49%** | **46%** | **39%** | **38%** | **83%** |
| **Catering** | **60%*** | **54%** | **52%*** | **45%** | **41%*** | **41%*** | **84%*** |
| Hotels | 62% | 56% | 45% | 46% | 41% | 52%* | 89% |
| Pubs and bars | 62% | 55% | 56%* | 44% | 44% | 46%* | 82% |
| Leisure and Entertainment | 64% | 53% | 53% | 38% | 41% | 36% | 85% |
| Restaurants and cafes | 59% | 54% | 51% | 46% | 42%* | 41%* | 84% |
| Restaurants | 57% | 53% | 49% | 54%* | 45%* | 39% | 83% |
| Cafes | 61% | 54% | 56%* | 39%* | 42% | 42% | 86% |
| Takeaways | 60% | 52% | 35%* | 39% | 32% | 35% | 79% |
| Caterers | 63% | 56% | 55% | 45% | 36% | 37% | 86% |
| **Retailers** | **39%*** | **35%*** | **36%*** | **36%*** | **27%*** | **20%*** | **68%*** |
| Butchers | 42%* | 36%* | 31%* | 30%* | 27%* | 22%* | 66%* |
| Bakers | 42%* | 40%* | 49% | 39% | 37% | 29% | 79% |
| Fishmongers | 40%* | 37%* | 40% | 22%* | 32% | 12%* | 66%* |
| Delicatessens | 63% | 48% | 53% | 35%* | 25%* | 24%* | 84% |
| General retail | 31%* | 31%* | 29%* | 38%* | 22%* | 16%* | 60%* |
| **Institutions** | **65%*** | **71%*** | **49%** | **56%*** | **39%** | **37%** | **90%*** |
| Care homes and hospitals | 66% | 60% | 45% | 49% | 39% | 39% | 87% |
| Pre-primary and primary education | 65% | 76%* | 51% | 58%* | 37% | 34% | 91% |
| Other education | 69% | 74%* | 48% | 54% | 54%* | 58%* | 90% |
| Defence and justice | 63% | 71% | 44% | 52% | 26% | 30% | 86% |
| Other institutions | 36% | 64% | 50% | 76% | 45% | 29% | 97% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (30); other education (48); defence and justice (32); and other institutions (27).

**Table B.9: FSA / FSS resources considered most useful, by sector**

| Sector | Advice or guidance webpages | E-training on allergens | Posters | FSA's Technical Guidance | Menu grids or templates | Recipe sheets |
|---|---|---|---|---|---|---|
| **Total** | **19%** | **18%** | **16%** | **14%** | **11%** | **8%** |
| **Catering** | **19%** | **16%*** | **15%** | **14%** | **12%*** | **10%*** |
| Hotels | 14% | 17% | 15% | 9% | 22%* | 11% |
| Pubs and bars | 17% | 16% | 13% | 9% | 17%* | 8% |
| Leisure and Entertainment | 22% | 22% | 16% | 19% | 7% | 4% |
| Restaurants and cafes | 18% | 16% | 17% | 15% | 10% | 11%* |
| Restaurants | 17% | 19% | 18% | 15% | 7%* | 7% |
| Cafes | 16% | 13%* | 15% | 16% | 13% | 15%* |
| Takeaways | 34%* | 13% | 17% | 10% | 5% | 11% |
| Caterers | 24% | 16% | 11% | 12% | 11% | 8% |
| **Retailers** | **21%** | **21%** | **14%** | **20%*** | **5%*** | **8%** |
| Butchers | 31%* | 11% | 18% | 14% | 4% | 10% |
| Bakers | 11% | 22% | 12% | 23%* | 12% | 8% |
| Fishmongers | 34% | 12% | 7% | 13% | 6% | 4% |
| Delicatessens | 32%* | 12% | 10% | 19% | 5% | 2% |
| General retail | 19% | 29%* | 15% | 21% | 3%* | 9% |
| **Institutions** | **18%** | **22%*** | **19%** | **14%** | **10%** | **3%*** |
| Care homes and hospitals | 22% | 16% | 18% | 18% | 11% | 3%* |
| Pre-primary and primary education | 17% | 25%* | 20% | 13% | 9% | 3%* |
| Other education | 14% | 16% | 14% | 12% | 14% | 5% |
| Defence and justice | 11% | 27% | 27% | 6% | 0% | 12% |
| Other institutions | 20% | 31% | 18% | 16% | 0% | 15% |

Base: All FBOs that had used FSA or FSS resources, (1906). See Table A.3 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (20); other education (43); defence and justice (27); and other institutions (24).

**Table B.10: Food allergen information provided to staff, by sector**

| Sector | Given Verbal Training | Formal training for all new staff | Posters on the walls | Given a staff handbook on business procedure | Online training | Given booklets on allergy control | Given a copy of FSA's Technical Guidance | Information leaflets |
|---|---|---|---|---|---|---|---|---|
| **Total** | **90%** | **88%** | **71%** | **68%** | **62%** | **51%*** | **49%** | **48%** |
| **Catering** | **91%*** | **87%*** | **71%** | **68%** | **59%*** | **55%*** | **52%*** | **47%** |
| Hotels | 77%* | 82%* | 69% | 70% | 71%* | 50% | 44% | 44% |
| Pubs and bars | 94%* | 88% | 71% | 71% | 62% | 48% | 52% | 39%* |
| Leisure and Entertainment | 88% | 89% | 59%* | 62% | 49%* | 49% | 39% | 63%* |
| Restaurants and cafes | 91%* | 88% | 72% | 68% | 55%* | 57%* | 53%* | 48% |
| Restaurants | 92% | 92%* | 73% | 71% | 57%* | 55% | 53% | 53%* |
| Cafes | 92% | 87% | 68% | 64%* | 52%* | 59%* | 52% | 45% |
| Takeaways | 87% | 86% | 84%* | 67% | 62% | 55% | 57% | 48% |
| Caterers | 91% | 79%* | 66% | 69% | 65% | 54% | 49% | 48% |
| **Retailers** | **89%** | **89%** | **62%*** | **65%*** | **55%*** | **45%*** | **44%*** | **46%** |
| Butchers | 91% | 91% | 62% | 56%* | 30%* | 47% | 47% | 32%* |
| Bakers | 84% | 85% | 61%* | 67% | 56% | 47% | 40%* | 48% |
| Fishmongers | 77%* | 75%* | 58% | 49%* | 30%* | 28%* | 52% | 47% |
| Delicatessens | 95% | 85% | 61%* | 61% | 52% | 35%* | 46% | 53% |
| General retail | 90% | 92% | 63%* | 70% | 67% | 45% | 45% | 49% |
| **Institutions** | **86%*** | **92%*** | **79%*** | **71%** | **80%*** | **42%*** | **45%*** | **53%*** |
| Care homes and hospitals | 86% | 88% | 75% | 70% | 77%* | 43% | 44% | 51% |

| Sector | Given Verbal Training | Formal training for all new staff | Posters on the walls | Given a staff handbook on business procedure | Online training | Given booklets on allergy control | Given a copy of FSA's Technical Guidance | Information leaflets |
|---|---|---|---|---|---|---|---|---|
| Pre-primary and primary education | 85%* | 94%* | 80%* | 73% | 81%* | 41%* | 45% | 52% |
| Other education | 88% | 84% | 83% | 58% | 77%* | 46% | 42% | 65%* |
| Defence and justice | 92% | 91% | 76% | 80% | 80%* | 65% | 51% | 61% |
| Other institutions | 100% | 100% | 97% | 97% | 82% | 64% | 38% | 67% |

Base: All FBOs (2,303). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.

Note – the following subgroups have low base sizes: fishmongers (20); other education (43); defence and justice (27); and other institutions (24).

**Table B.11: FBOs that have a formal system or practice in place to prevent cross contamination, by sector.**

| Sector | 2020 | 2012 |
|---|---|---|
| **Total** | **96%** | **76%** |
| **Catering** | **97%*** | **75%** |
| Hotels | 97% | 75% |
| Pubs and bars | 97% | 81% |
| Leisure and Entertainment | 94% | N/A |
| Restaurants and cafes | 96% | 75% |
| Restaurants | 97% | 78% |
| Cafes | 97% | 75% |
| Takeaways | 92%* | 69% |
| Caterers | 99% | 74% |
| **Retailers** | **91%*** | **60%** |
| Butchers | 93% | 64% |
| Bakers | 92%* | 65% |
| Fishmongers | 90% | 70% |
| Delicatessens | 89%* | 71% |
| General retail | 90%* | 56% |
| **Institutions** | **99%*** | **86%** |
| Care homes and hospitals | 96% | 83% |
| Pre-primary and primary education | 100%* | 91% |
| Other education | 99% | 86% |
| Defence and justice | 96% | 79% |
| Other institutions | 100% | 72% |

Base: All FBOs: 2020 (2,303); 2012 (1,666). See Table A.1 in Appendix A for subgroup base sizes. Results marked with an asterisk are statistically significant differences compared to the combined average of other FBOs in the same subgroup category.
Note – the following subgroups have low base sizes:
2020: fishmongers (20); other education (43); defence and justice (27); and other institutions (24). 2012: delicatessens (49); defence and justice (49); other institutions (40).