

# Baseline Study on the Provision of Allergy Information to Consumers for Foods which are not prepacked

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## Abbreviations

EO	Enforcement Officer
EHO	Environmental Health Officer
FB	Food business
FHDP	Food Hygiene Delivery Programme
FSA	Food Standards Agency
HACCP	Hazard Analysis and Critical Control Point
LA	Local Authority
SFBB	Safer Food, Better Business
TSO	Trading Standards Officer
EU FIC	European Union Food Information for Consumers Regulation
FBO	Food business operators

## Glossary

Allergen	A substance, usually a protein, capable of inducing an allergic reaction.
Anaphylaxis/ Anaphylactic Shock	Acute and severe form of an allergic reaction characterised by urticaria, swelling of the lips, shortness of breath, and rapid fall in blood pressure. Without immediate treatment which consists of intramuscular injection of adrenaline, anaphylaxis can be fatal.
CookSafe	A food safety management system that has been developed by the FSA to help businesses comply with food hygiene regulations.
Cross-Contamination	The unintentional presence of another substance in the final 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.
HACCP	Hazard Analysis and Critical Control Point. An internationally recognised food safety management system that identifies, evaluates, and controls hazards that are significant for food safety. European food law requires every food business (except primary producers e.g. a farmer or fisherman) to implement a food safety management system based on HACCP principles.
Prepacked food	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 sold 'loose'	Non-prepacked foods are not defined in legislation however can be considered as foods sold loose, for instance, non-wrapped. 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 for direct sale	Prepacked foods for direct sale are generally foods that have been packed on the same premises as they are being sold (eg sandwiches, bread and cakes from a bakery, in store deli counters). In these situations it is thought that the customer would be able to speak to the person who made/packed the foods to ask about ingredients and so these foods do not generally have to be labelled with ingredients (including the 14 allergens) by the law.
Food not prepacked	For the purpose of this report foods not prepacked include both foods prepacked for direct sale and non-prepacked foods.
Safe Catering	A food safety management system that has been developed by the FSA to help businesses comply with food hygiene regulations.
Safer food, better	A food safety management system that has been



business (SFBB)

developed by the FSA to help businesses comply with food hygiene regulations.

# Executive Summary

## 1. Introduction

The focus of this report is on the provision, by food businesses, of information on allergens for consumers for foods not prepacked. The study was commissioned to provide baseline information on business practices prior to the introduction of new EU Food Information for Consumers Regulation (EU FIC) No.1169/2011 and the provisions that will apply from December 2014. Under the new regulation, food businesses must inform consumers if any of 14 allergens have been added as ingredients or processing aids to foods not prepacked. 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). The EU FIC was published in December 2011 it provided a three year transition period to allow food businesses to take necessary actions in order to comply with the provisions, at which point they will be mandatory.

The primary aim of the study was to ascertain the prevalence and type of information currently provided on allergenic ingredients in foods not prepacked. Specific objectives included:

- To understand the current provision of information on allergenic ingredients in foods not prepacked by food businesses. This information will establish a baseline. A follow-up study post 2014 will assess compliance with the regulations once in force.
- To explore why information currently is/or is not provided and the (potential) barriers that prevent/could prevent information on allergenic ingredients being provided and whether this is influenced by business characteristics such as the size or type of business.
- To identify whether food businesses check ingredients from suppliers
- To identify food business awareness of the new allergen information requirements for foods not prepacked foods
- To identify perceived barriers to compliance with the new law.
- To assess the support food businesses may require to comply with new regulations
- To assess awareness of the current guidance on food allergen information provision among food businesses.
- To identify the source of guidance used (whether from FSA, LA or other sources).

### Secondary aims

- To identify the prevalence and type of information currently provided by food businesses about cross contamination with food allergens (“may contain” information).
- To identify the prevalence and type of information currently provided by food businesses in relation to ‘free-from’ claims.

## 2. Methods

To address the above objectives a multi-method, research design was undertaken. The study used survey and qualitative research techniques, identified below, with the findings from each stage informing the next:

- **Phase 1** Scoping stage: 10 interviews with industry representatives, consumer representatives, environmental health officers and policy experts.
- **Phase 2** A baseline survey of 1666 food businesses
- **Phase 3** 56 Market stall interviews
- **Phase 4** Follow-up interviews with 25 food businesses selling loose foods

Target food businesses are those selling foods not prepacked and include restaurants, cafes, mobile caterers, transport, mass caterers, institutions (hospitals, schools, care homes), sandwich shops, bakeries and in store supermarkets. In a retail environment foods not prepacked 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 not prepacked, such as meals served in a canteen, restaurant or from a takeaway.

## 3. Summary of the main findings

### 3.1 Current information provision

#### Formal policies

Overall, 60% of food businesses had a policy on allergen information provision, (41% a formal written policy, 19% an informal unwritten policy). Formal policies were most common among chains, large businesses, and institutions while, within the catering sector, takeaway businesses were the least likely to operate either a formal or informal policy, with restaurants and pubs/bars the most likely.

#### Information provided on the 14 allergens

Among businesses that sold food containing each of the 14 allergenic ingredients, information provision varied greatly according to the allergen. The proportion of food businesses providing any information on each allergen (oral and/or written) was as follows: peanuts – 80% ; other nuts – 81%; cereals containing gluten – 75%; eggs – 62%; fish – 62%; milk – 61%; sesame seeds – 61%; molluscs 59%; crustaceans – 57%; soybeans – 54% ; lupin 53% ; mustard 51%; celery – 50%; sulphur dioxide -44%.

Retailers were more likely than institutions or caterers to provide information on several of the allergens and, within the catering sector, restaurants were most likely to provide allergen information while hotels and cafes/sandwich shops were the least likely. Having a formal or informal policy on food allergens was associated with a greater likelihood of providing consumers with food allergen information, as was being aware of the FSA voluntary best practice guidance.

Reasons given by businesses for not providing information in relation to any or all of the 14 food allergens included: ‘no customer demand’ in relation to some of the allergens (31%); that the business focussed only on the more common allergens (30%); and, to a lesser extent, due to a lack of knowledge about food allergens (10%).

### **How information is provided**

20% of all surveyed businesses only provided information orally, 64% provided information both orally and in writing, 6% provided only written information and 7% provided no allergen information whatsoever. The survey asked business owners/managers whether they used the same approach to providing information for all the food types they sold (for example soups, sandwiches or other produce). The vast majority – 92% – affirmed the same approach was used.

### **Storing and auditing information**

In order to provide accurate information to consumers, businesses need to know the ingredients they sell in meals and products. Overall, half the food businesses surveyed ‘always’ checked or audited ingredients from their suppliers or wholesalers; 21% sometimes checked; and 27% never checked. Reasons for not checking, explored during the follow-up stage, included: established relationships with suppliers that they largely trust and not having the means or resources to verify whether information about the ingredients is correct.

### **May contain and free from information provision**

29% of businesses used 'may contain' information in relation to their meals or produce. The ingredients most widely referred to in 'may contain' labels were 'other' nuts and gluten (17% in each case) followed by eggs and milk (14% in each case) and peanuts (13%). Less widely cited were: fish (10%); mustard (8%); and sesame seeds (7%). The remaining allergens of interest (celery, soybeans, crustaceans, molluscs, lupin and sulphur dioxide) were cited by 5% or fewer businesses.

Given the need for stringent auditing processes, the incidence of 'free from' information is not widespread, overall only 13% of surveyed businesses provided 'free from' guarantees. Gluten was the most common ingredient referred to - found in 87% of food businesses that used free from information. Milk was referred to by 55% of businesses which used free from information; eggs by 51%; peanuts by 45%; and other nuts by 41% of businesses. Approximately one third of businesses (31%) referred to fish and soybeans. Less widely cited were sesame seeds (29%), celery (26%), mustard (25%), crustaceans (24%), molluscs (19%), lupin (19%), and sulphur dioxide (14%).

## **3.2 Business processes and staff training**

### **Familiarity with allergens documentation**

Exactly half the businesses surveyed have read materials relating to food allergens . The most common sources of food allergen information were Local Authorities and the Food Standards Agency. Two fifths of business owners/managers were aware of the FSA best practice guidance (51% of these were merely aware of the guidance, 33% have read parts of the guidance and just 15% have read it in full). Virtually all who read the guidance found it helpful.

### **Training among owners/managers and their staff**

34% of business owners/ managers have received some form of formal training on food allergens. 60% of business owners/managers had either read allergen related documentation or received formal training.

88% of food businesses also provided allergen training for their new staff. Training was supported by a range of written materials, for example the FSA voluntary best practice guidance

### **3.3 Awareness of the new law, anticipated changes and preferred type of help**

#### **Awareness of the new legislation**

Awareness is low at just one in five businesses and, among those aware, the follow up interviews suggest there is some confusion about what the new legislation involves and what measures will need to be taken. Awareness was highest in Scotland at 30% and lowest in Wales at 14%. Rates of awareness also differed within the catering business sector – from a low of 14% in sandwich shops to a high of 25-26% in pubs and restaurants.

#### **Anticipated challenges**

90% of businesses aware of the new law acknowledged that they would need to make at least one of the following changes: request more information from contractors; provide more staff training; provide information on a wider range of allergens and a wide range of meals/products and be more stringent in record keeping. 33% of food businesses indicated they would need to introduce all the listed changes. Of these 321 businesses a little over half anticipated that introducing changes to become compliant with the new law would be 'easy'. (i.e. scoring 4 or 5 on a scale of 1-5, where 1 is 'very difficult' and 5 is 'very easy'). At the follow up stage, some businesses that relied heavily on printed menus and fixed signage saw the changes to labelling and information provision as more of a challenge. Follow up work is being undertaken in those businesses which do not have an awareness of the legislation, to understand what difficulties they would have in complying with the new legislation and how they would comply.

#### **Support**

In relation to the changes food businesses believed they would need to introduce, the following types of information were described as best meeting their needs: hard copy booklets or documents.; online documentation; or face to face delivery of information or

advice. Smaller proportions of food businesses also expressed interest in receiving information in the form of case studies, by means of a DVD or via workshops/ seminars. Follow up research highlighted the need for clear information on what will be expected of businesses and prescriptive guidelines instructing them what to do in order to fulfil their obligations.

# **1. Introduction**

## **1.1 Background**

The Food Standards Agency (FSA) is an independent government department responsible for food safety and hygiene across the UK. It works with businesses to help them produce safe food, and with local authorities to enforce food safety regulations. In pursuit of its vision of 'Safer food for the nation', the FSA aims to ensure that food produced or sold in the UK is safe to eat, consumers have the information they need to make informed choices about where and what they eat and that regulation and enforcement is risk-based and focused on improving public health.

Current labelling rules in European Directives 2003/89/EC and 2006/142/EC ensure that all consumers are given comprehensive ingredient listing information and make it easier for people with food allergies to identify ingredients they need to avoid. The EU Food Information for Consumers Regulation (EU FIC) No. 1169/2011 came into force in December 2011 and provided a three year transition period to allow food businesses to take necessary actions in order to comply with the provisions, at which point these regulations will be enforced. The new regulation will build on current allergen labelling provisions for prepacked foods and will introduce a new requirement for allergen information to be provided for foods sold not-prepacked or prepacked for direct sale (definitions are provided below).

The study has been commissioned to provide baseline evidence on business practices relating to the provision of food allergen information before the new rules for allergen information for foods sold not prepacked apply in December 2014. Under the new regulation, the current allergen labelling requirements for prepacked foods are maintained with a new requirement to emphasise allergens within the ingredients list. These food 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). It also introduces a new requirement for allergen information to be provided for foods sold not prepacked. The focus of this report is on the provision, by food businesses, of food allergen information for consumers for foods not prepacked. When providing foods not prepacked, businesses must let consumers know if any of 14 allergens have been used as an ingredient or as a processing aid in the foods that they serve.



## Food allergies

Eating certain foods can lead to a severe physical reaction in some people. This food-hypersensitivity can involve the immune system, in which case it is called a food allergy. The most common type of food allergy is triggered by an antibody called immunoglobulin E (IgE). This is known as an IgE mediated food allergy and tends to cause rapid symptoms within seconds or minutes of exposure to certain foods. Adverse reactions not caused by IgE tend to cause symptoms hours or even days after exposure to certain foods. Food intolerance is different from a food allergy. Food intolerance does not usually involve the immune system (with the exception of Coeliac Disease). Symptoms are generally not as severe or immediately life threatening as a food allergic reaction.

For the purpose of this report when referring to food allergies, this also includes relevant food intolerances such as coeliac disease.

In children, the foods that most commonly cause an allergic reaction are (NHS Choices<sup>1</sup>):

- milk
- eggs
- peanuts
- tree nuts
- fish
- shellfish

Children may outgrow some food allergies. Adverse reactions to food, including fatal reactions, occur most frequently among teenagers and young people, particularly when they are eating away from home (COI, 2005).

In adults, the most common type of food allergy are associated with

- Raw fruits and vegetables, most commonly: apples, stone fruit and tree nuts, especially hazelnuts.
- Fish
- Shellfish
- Peanuts
- Legumes and seeds

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<sup>1</sup> <http://www.nhs.uk/Conditions/food-allergy/Pages/Intro1.aspx?url=Pages/What-is-it.aspx>

Fatal allergic reactions are more commonly associated with peanuts and tree nuts (Pumphrey and Gowland, 2007).

The prevalence of food hypersensitivity is difficult to establish and estimates are highly varied (Mills et al, 2007). The FSA's Food and You surveys found that in 2010 and 2012 respectively, 6% and 4% of respondents described themselves as allergic to certain food (TNS/PSI, 2013<sup>2</sup>). It is estimated that about 1-2% of adults and 5-8% of children now have a food allergy (British Nutrition Foundation) which equates to 1.2 to 1.5 million people in the UK<sup>3</sup>. Around 1% of the UK population are intolerant to gluten (often referred to as coeliac disease)

The number of individuals suffering from allergic reactions to food has been increasing and the incidence varies by social group - a study of GP records found that between 2001 and 2005, the number of existing cases doubled from 24 in 100,000 people in 2001 to 51 in 100,000 people in 2005 (Kotz et al, 2011). The likelihood of having a peanut allergy was higher in boys than girls among the under 18s and the condition was more common in higher than lower socioeconomic status groups. Other research indicates that nut and peanut allergies now affect one in 50 children (British Nutrition Foundation).

## Impact of food allergies

Food allergy affects all age groups and avoidance is the only way to manage the condition. Food allergies have a negative impact on quality of life, can lead to social isolation and anxiety and complicates everyday activities (Knibb et al, 2000, Mills et al, 2007). It can be difficult to avoid certain foods, and shopping can be a time-consuming process when food labels need to be carefully checked. Purchasing food from markets, stalls or other catering establishments is potentially risky due to cross contamination if utensils are used for more than one food product. Problems also arise in food establishments when dishes are presented without detailed information on ingredients (IFST, 2009).

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<sup>2</sup> [http://www.foodbase.org.uk/results.php?f\\_report\\_id=805](http://www.foodbase.org.uk/results.php?f_report_id=805)

<sup>3</sup> [www.cieh.org/ehp/allergy\\_alert.html?terms=allergy](http://www.cieh.org/ehp/allergy_alert.html?terms=allergy)

Clear information on allergenic ingredients by food manufacturers, retailers and catering staff is therefore essential to help consumers with allergies to manage their condition and protect their health.

## Food labelling and legislation

Comprehensive food labelling is a critical health issue. Current food labelling regulations (2003/89/EC) require that all prepacked foods (including alcoholic drinks) must clearly declare any of the following 14 allergens on the label if used as an ingredient or processing aid, these include:

- cereals containing gluten (wheat, rye, barley, oats, spelt, kamut and their hybridised strains)
- crustaceans
- molluscs
- eggs
- fish
- peanuts
- lupin
- Soybeans
- milk
- nuts (almond, hazelnut, walnut, cashew, pecan, Brazil, pistachio, macadamia nut (Queensland nut))
- celery
- mustard
- sesame seeds
- sulphur dioxide and sulphites (at more than 10 mg/kg or 10mg/litre.)

Currently there is no requirement for food businesses to provide this information for foods not-prepacked. Prepacked foods for direct sale are foods that have been packed on the same premises as they are being sold where customers can, in principle, speak to the

person who made/packed the foods to ask about ingredients. Non-prepacked foods are sold 'loose', including, for example:

- 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
- in a catering environment - meals served in a restaurant or from a takeaway.

Again, it is assumed that customers in these premises could, in principle, speak to the person who made the foods to ask about ingredients. For the purpose of this report foods 'prepacked for direct sale' and foods 'non-prepacked' are both included in the definition 'foods not prepacked'.

At the end of 2014, the new legislation will require food businesses to provide information on 14 food allergens in foods not-prepacked (for example, in catering outlets, deli counters, bakeries and sandwich bars). The purpose of the new EU Regulation is to streamline current labelling legislation "in order to ensure easier compliance and greater clarity for stakeholders and to modernise [legislation] in order to take account of new developments in the field of food information. This Regulation will both serve the interests of the internal market by simplifying the law, ensuring legal certainty and reducing administrative burden, and benefit citizens by requiring clear, comprehensible and legible labelling of foods"<sup>4</sup>.

The new requirements will apply to all food businesses at all stages of the food chain, including: food intended for the final consumer, food delivered by mass caterers and food intended for supply to mass caterers. The new regulation does not, however, require

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<sup>4</sup> Regulation (EU) No 1169/2011 of the European parliament and of the council of 25 October 2011

information to be provided on the presence of the 14 food allergens as a result of potential cross contamination, i.e. 'may contain' labelling, nor does it regulate 'free-from' labelling.

A UK Government (2012) draft guidance document on the EU FIC indicates that food allergen information can be supplied by food businesses on menus, chalk boards, tickets/labels or provided orally by a member of staff as well as in other formats. Information must be clear and conspicuous, easily visible, and legible. The guidance also advises that if the information is to be provided orally by a member of staff, then it is necessary to make it clear that the information can be obtained in this manner by means of a notice, menu, ticket or label that can easily be seen by customers. The guidance notes that: "it is no longer enough for an FBO to say that they do not know whether or not a food contains an allergen listed ... nor is it enough to say that all their foods may contain allergens".

Technical guidance is also being developed by the FSA to help businesses address more complex issues and to assist them in meeting these new requirements.

## Role of the FSA

The Food Standards Agency plays an important role in ensuring that the public are protected from potentially life threatening food allergies by working with the food industry to ensure food labelling enables consumers with food allergies are able to make safe and informed choices. Broadly, the remit of the FSA in relation to food allergy and intolerance is threefold:

- to fund research that will help increase knowledge and understanding of food allergy and intolerance
- to strengthen food labelling rules to help people who need to avoid certain ingredients
- to help raise awareness of food allergy and intolerance among caterers

Specific activities undertaken by the FSA food allergy branch include:

- Risk assessment of food allergy incidents and the issue of allergy alerts
- Provision of food allergen labelling guidance to help food businesses provide information to customers who need to avoid certain ingredients because of an

allergy. Current guidance includes general advice and information on allergy and intolerance and the food labelling rules.

- Online food allergy training - an interactive food allergy training tool is available which highlights good practice in the manufacture and production of food. It also offers practical advice to local authority food law enforcement officers and other interested parties such as staff in the manufacturing and catering industries.
- Working with the food industry and other groups to ensure that 'may contain' food allergen labelling is used appropriately and accurately while also reducing the unnecessary use of 'may contain' labelling in response to concerns of over-use. In addition, providing best practice guidance on the appropriate use of 'may contain' allergy labelling.

## **1.2 Aims and objectives**

The EU Food Information for Consumers Regulation (EU FIC) (No. 1169/2011) allergen labelling provisions will apply from December 2014. It introduces a new requirement for information on the presence of 14 allergens when used as deliberate ingredients to be provided for foods not prepacked. The EU FIC was published in December 2011 providing a three year transition period to allow food businesses to take necessary actions in order to comply with the provisions. The primary aim of the study was to ascertain the prevalence and type of information currently provided on allergenic ingredients in foods not prepacked. Specific objectives included:

- To understand the current provision of information on allergenic ingredients in foods sold not prepacked and prepacked for direct sale by food businesses. This information will establish a baseline. A follow-up study post 2014 will assess compliance with the regulations once they are in force. Identify whether information differs according to food type.
- To explore why information currently is/or is not provided and the (potential) barriers that prevent/could prevent information on allergenic ingredients being provided and whether this is influenced by business characteristics such as the size or type of business.
- To assess food business awareness and views of current voluntary guidance.
- To identify the source of guidance used (whether from FSA, local authority (LA) or other sources) and whether oral and/or written.
- To identify food business awareness of the new allergy requirements for foods not prepacked foods
- To identify perceived barriers to compliance.
- To assess the support food businesses may require so that they can comply with new regulations and how the FSA can best assist food businesses to move forward.
- To identify whether food businesses check/confirm ingredients from suppliers.

#### Secondary aims

- To identify the prevalence and type of information currently provided by food businesses about cross contamination of food allergens (e.g. “may contain” information).
- To identify the prevalence and type of information currently provided by food businesses in relation to ‘free-from’ claims.

Target food businesses are those selling foods not prepacked and include restaurants, cafes, mobile caterers, transport, mass caterers, institutions (hospitals, schools, care homes), sandwich shops, bakeries and in store supermarkets. In a retail environment this would apply to any foods sold from a delicatessen counter (e.g. cold meats, cheeses, quiches, pies and dips), fish from the counter, 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.

## 2 Methodology

In order to achieve the objectives set out above, a multi-methods, iterative research design was undertaken. The study used survey and qualitative research techniques in four sequential phases, as shown below, with the findings from each stage informing the next. In this section, an overview of the methodology is presented; detailed information can be found in a separate technical report.

- **Phase 1** 10 interviews with industry representatives, consumer representatives, environmental health officers and policy experts
- **Phase 2** A baseline survey of 1666, food businesses;
- **Phase 3** 56 Market stall interviews
- **Phase 4** Follow-up interviews with 25 food businesses;

### 2.1 Phase I: The scoping phase

The scoping phase consisted of telephone interviews with a range of stakeholders. To gain a variety of perspectives, interviews were conducted with: 2 industry representatives, 2 consumer representatives, 2 food policy experts and 4 LA enforcement officers or

trading standards officers with day to day knowledge of food business practices and the challenges they face<sup>5</sup>. These individuals were selected on the basis of their knowledge of food allergen related issues. 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.

Eliciting the views and expertise of environmental health officers, policy experts and industry and consumer representatives helped to frame the terms of the study, to highlight and verify the range of themes to be explored at the survey stage and to clarify the regulatory requirements and the changes businesses are likely to need to make to become fully compliant. Organisations representing food businesses have a role in promoting awareness and disseminating guidelines on a variety of legislation, including the new allergy labelling regulations. These agencies also receive feedback from food businesses about the practicalities of food allergen labelling and information. Perspectives of industry representatives were therefore felt to provide useful information on the issues surrounding implementation on the ground. Environmental health officers, consumer organisations and policy experts were consulted to gain insights into consumer needs, current business practices and possible obstacles to introducing changes. Local authority enforcement officers or trading standards officers have day to day knowledge of food business practices and the challenges they face while the consumer organisation representatives and policy experts were selected on the basis of their expertise in relation to allergy issues.

Emergent findings from the scoping stage ensured that the baseline survey questionnaire was relevant, comprehensive in terms of the range and detail of issues covered and meaningful to food businesses. 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 20 minute semi-structured interviews via telephone. Fieldwork took place during October 2012. Interview instruments and key findings from the scoping phase are presented in the technical report (IFF, 2013).

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<sup>5</sup> Food allergen labelling is primarily under the remit of TSOs, however some local authorities have unitary agreements on who leads in this area. Within London, for example, allergy labelling issues are the responsibility of Enforcement Officers.



## **2.2 Phase 2: Telephone survey of food businesses**

The core telephone survey of food businesses was designed to meet all study objectives outlined earlier in Section 1.2 and to establish a baseline against which progress can be assessed in any follow-up studies, post 2014. As such, a core set of clear quantifiable measures and indicators were used that can readily be reproduced at a later stage.

Between November and December 2012, a total of 1,666 telephone interviews were conducted with food businesses of all sizes across the UK selling foods not prepacked including:

- Sold non-prepacked i.e. 'loose', without any packaging to alert consumers to their composition; and/or
- Packaged on the same premises from which they are sold (and are thus currently exempt from mandatory labelling to indicate their ingredients, on the grounds that – in theory – the consumer will be able to speak directly to the food producer to establish what the ingredients are). Known as prepacked for direct sale.

The respondent was the most senior person within the business responsible for food safety at the site 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.

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 and on transport. The specific SIC codes identified for the research are listed out in Table 2.1.

**Table 2.1: Sectors covered by the telephone survey**

UK SIC 2007 Sub-class		Survey grouping
Code	SIC description	
47.24	Retail sale of bread, cakes, flour confectionery and sugar confectionery in specialised stores	Bakers
47.22	Retail sale of meat and meat products in specialised stores	Butchers
47.29	Other retail sale of food in specialised stores	Delicatessens
56.21	Event catering activities	Caterers
56.29	Other food service activities	
47.23	Retail sale of fish, crustaceans and molluscs in specialised stores	Fishmongers
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	
47.30	Retail sale of automotive fuel in specialised stores	
55.10	Hotels and similar accommodation	Hotels
84.22	Defence activities	Institutions and large employers <sup>6</sup>
84.23	Justice and judicial activities	
85.10	Pre-primary education	
85.20	Primary education	
85.31	General secondary education	
85.32	Technical and vocational secondary education	
85.41	Post-secondary non-tertiary education	

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<sup>6</sup> Large businesses were sampled across all SIC codes

UK SIC 2007 Sub-class		Survey grouping
Code	SIC description	
85.42/1	First-degree level higher education	
85.42/2	Post-graduate level higher education	
86.10/1	Hospital activities	
86.10/2	Medical nursing home activities	
87.10	Residential nursing care activities	
87.20	Residential care activities for learning disabilities, mental health and substance abuse	
87.30	Residential care activities for the elderly and disabled	
87.90	Other residential care activities	
56.30/2	Public houses and bars	Pubs and bars
56.10/1	Licensed restaurants	Restaurants and cafes
56.10/2	Unlicensed restaurants and cafes	
56.10/3	Take away food shops and mobile food stands	
49.10	Passenger rail transport, interurban	Transportation
50.10	Sea and coastal passenger water transport	
50.30	Inland passenger water transport	
51.10/1	Scheduled passenger air transport	
51.10/2	Non-scheduled passenger air transport	

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.

Contact details and basic profile information (size, sector etc.) for businesses to be contacted as part of the survey were purchased from Experian. Experian is one of the UK's most comprehensive business databases which combines data from various sources including Yell (the Yellow Pages) and the Thomson business database. Critical for this survey, their coverage of small establishments is very good.

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 were selected for survey entirely at random. Quotas were set according to the proportionate distribution of businesses operating within each sector according to the UK business profile whilst also ensuring that a minimum of 50 interviews were conducted within each sector.

To allow for subgroup analysis within country more than 200 additional interviews were completed in the devolved administrations (an extra 59 in Scotland; 111 in Northern Ireland and 77 in Wales).

A total of 30 pilot interviews were conducted mid-November 2012 to test the flow and wording of the questionnaire. This exercise also provided a better steer on the proportion of businesses within each sector that handled foods not prepacked

To ensure that eligible food businesses within each sector were targeted and qualified for the survey, the interview survey opened with a short screening section tailored to the different business sectors covered by the research. Those businesses falling under the broad 'Retail' sector were asked to confirm that they sold any foods not prepacked at that site and those sectors captured by the overall 'Caterer' classification were required to verify that meals were sold or served at the site. Fishmongers and general retailers were also asked if any of their foods not prepacked contained more than one ingredient, for example mixed seafood and prepared fish meals, or, for the retailers, pick and mix children's sweets or loose savoury items such as croissants, bread rolls or pies.

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 2.2.

The respondent was the most senior person within the business responsible for food safety at the site. This was typically the owner or manager in the smaller establishments or, in the case of some larger businesses, the catering manager. In some restaurants and hotels we spoke to the Head Chef. Their suitability was verified at the outset of the interview using a screening question agreed in conjunction with the FSA.

In the case of the transport sector, identifying, or rather tracking down the individual most responsible for the catering and food sold on a particular mode of transportation, proved more difficult. In the first instance where sample was sourced, telephone numbers provided were for head 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. Therefore the sample for the transport sector sourced from Experian was supplemented with additional sample secured through desk research and free-find exercises.

The telephone interview comprised five sections which explored current information provision practices relating to food allergens (including free-from and may contain labelling); staff training on food allergens; changes anticipated by businesses to be able to comply with the new EU regulations; and awareness of or exposure to, any documentation or guidance relating to the provision of food allergen information. The interview concluded with a short demographic section. On average, the telephone interview lasted 16 minutes.

At the end of the interview, respondents were asked if they would be willing to be contacted again in a few months' time to take part in further research on the provision of food allergen information. Those respondents who agreed at this question formed the sampling frame for the final stage of the research, the qualitative follow-up with food businesses.

Survey results were weighted so that findings were representative of UK businesses operating within these sectors selling or serving foods not prepacked. More information on sampling, weighting and the survey methodology can be found in the technical report.

**Table 2.2: Final Survey Sample Characteristics**

			Weighted column %	Unweighted column %	N
Sector	Retail	Butcher	3	3	52
		Baker	3	3	50
		Fishmonger	<0.5	3	50
		Delicatessen	1	3	49
		General retail	9	12	200
	Caterer	Restaurant	12	10	172
		Cafe/sandwich shop	13	12	199
		Takeaway	9	8	128
		Hotel	5	4	62
		Pub/bar	12	16	268
		Transport catering	<0.5	2	27
		Contract caterer	6	6	100
		Institution	Care-home/hospital	11	5
	Pre-school		11	5	80
	Other school		3	3	55
	Defence/justice		<0.5	3	49
	Large business		1	2	40
Size of business	1-4		35	35	586
	5-10		26	27	452
	11+		38	37	613
	Unknown size		1	1	15

<b>Country</b>	England	83	70	1162
	Scotland	9	12	198
	Northern Ireland	3	9	152
	Wales	5	9	154
<b>Chain</b>	Chain	28	29	479
	Non-chain	72	71	1184
	Unknown whether chain	<0.5	<0.5	3
Total		100%	100%	1666

## **2.3 Phase 3: Market stall interviews**

In addition to the main survey, further interviews were completed with stalls and mobile food outlets at nine different markets in London, the South East, the Midlands and the North. Due to resource constraints market stall interviews were limited to just four English regions. It was felt important to speak with market traders as they are likely to sell mixed ingredient food items loose or packed on site and are a group that have tended to have been omitted from sector consultations such as this.

This element of the survey required a discrete face-to-face recruitment exercise before telephone interviewing could begin. At each market, traders (both stalls and vans) were provided with information about the research and invited to complete the main survey over the telephone at a time convenient to them. Approximately ten traders were recruited from each market.

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 foods not pre-packed were considered to be predominantly single-ingredient food items.

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.

The recruitment and interviewing exercise took place throughout March 2013. A total of 56 interviews were conducted with market traders - 51 market stall holders and 5 mobile food vans.

A profile of the final market stall survey sample is presented in Table 2.3.



**Table 2.3: Final Survey Sample Characteristics – Market Stalls**

		Market Stall	Van	N
Region	London	23	3	26
	South East	8		8
	Midlands	10	2	12
	North	10		10
Total		51	5	56

Survey results relating to the market stalls and mobile food vans can be found in a separate chapter in the report (ch.6). 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.

## **2.4 Phase 4: Qualitative follow-up stage with food businesses**

The final element of the study entailed a qualitative follow-up of a sub-set of those food businesses interviewed as part of the main telephone survey.

This stage was designed to gain deeper insight into the perceptions and experiences of food businesses and to enhance understanding of the challenges associated with implementing new allergen information provision requirements in foods not prepacked and the range of solutions to these. The follow-up interviews explored, in greater depth, issues that emerged from the telephone survey and provided context and explanatory evidence for these.

Based on the findings from both the scoping stage and the quantitative survey, a purposive sampling approach was taken, deliberately targeting particular sub-groups as follows:

- Indian and Chinese restaurants and takeaways; to better understand the problems faced by businesses where English is not necessarily staff's first language
- Sandwich shops and bakeries; among whom the issue of cross-contamination was particularly relevant (e.g. through the use of single chopping boards for multiple allergenic ingredients).
- Pre-schools and care homes who provide food to more vulnerable members of society

As well as these specific sub-sectors, follow up interviews were also conducted with independent businesses with ten or fewer staff across a range of sectors. This was on the basis that the quantitative survey showed that policy and practice appeared less developed amongst such businesses.

Finally, given the difficulties in sourcing suitable transport catering contacts to participate in the quantitative element of the research, a small number of interviews were conducted with businesses in this sector.

The discussion guide explored in greater depth:

- Current information provision practices: reasons for (not) having a policy; reasons for (not) providing information on food allergens to customers including the use of 'free-from' and 'may contain' information and procedures for storing and updating food allergen information.
- Staff training and business procedures: ways in which training is provided to staff; challenges faced in giving training; formal systems used to prevent cross-contamination and recording and verifying supplier information on ingredients.
- Awareness of the new law and anticipated changes to current practices: level of ease or difficulty in making any change and the type of assistance required for making any changes.

The discussion guide was developed with input from the FSA. On average, the teledepth interviews lasted around 40 minutes.

In total 25 interviews were completed, with the following food businesses;

- 4 ethnic minority restaurants and takeaways;
- 6 sandwich shops and bakeries;
- 5 pre-schools and care homes;
- 8 small independent businesses (cross-sector);
- 2 transport catering

To ensure representation of all 4 countries across the UK 20 interviews were conducted with businesses in England with the further five in the devolved administrations. A blend of businesses that did and did not provide allergen information to their customers and staff was also achieved.

Each discussion transcript was coded into broad themes using a manual approach by members of the core research team. All the information in each theme area was then reviewed and further coded into sub-themes, allowing an assessment of the relative weight / commonality of issues raised and how views varied by business type. Analysis was conducted by all members of the project team.

Further information on this stage of the research, along with a copy of the topic guide can be found in the technical report.

## **2.5 Reporting conventions**

The report is based on findings from both the quantitative and qualitative survey elements. The weighting strategy used means that the quantitative findings are representative of UK businesses operating within these sectors.

In each section, findings from the qualitative follow up research (where relevant) are presented following discussion of the survey results. The qualitative research seeks to add depth to the survey findings, reporting on a range of views with examples and quotations from respondents. It is not intended to quantify or portray the prevalence of any one finding from the qualitative research and neither should it be taken to be representative of all UK businesses operating within these sectors; the findings simply relate to those businesses that were deliberately sampled and included in the qualitative phase because

of specific issues faced around the provision of allergen information (as set out in the previous section).

Chi squared tests and p values were generated to assess whether findings differed when comparing different types of business. All sub group differences reported are statistically significant at the 95% confidence level at least i.e.  $p < 0.05$  (this is where we can be 95% confident that the results did not come about by chance). In reporting significance, a \* denotes a statistically significant difference to all other groups in a category. For example, in Chart 4.1 (chapter 4) when comparing business sector, the 43% of retailers has an asterisk to indicate that it differs significantly from both the 28% of retailers and 23% of institutions. Caterers and institutions do not differ significantly from each other and therefore do not have an asterisk. When comparing businesses within subsectors there are often statistically significant differences between some groups but not others within the category – these are denoted with lower case letters. For example, in Chart 4.1, when comparing businesses within the catering subsector, the 12% of takeaways is significantly smaller than all other groups within the catering category – hence it has an asterisk, while the 37% of pubs/bars only differs significantly from group f ‘takeaways’ and group e contract caterers – this is indicated by means of a superscript ‘e’<sup>7</sup>.

When reporting sub-group findings only differences which are statistically significant are discussed. All tables and charts present unweighted bases.

Sub-group analyses throughout the report include:

- Business size in relation to staff numbers (1-4; 5-10; 11+)
- Whether the business is a chain i.e. one of a number of food retailers under the same ownership or an independent business
- Country (England, Scotland, Wales, Northern Ireland)
- Business sector - differentiated as retailers, caterers and institutions.
- Retailers include: butchers, bakers, fishmongers, delicatessens and general retailers. Caterers include: restaurants, cafes/sandwich shops, pubs/bars, transport caterers and contract caterers.

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<sup>7</sup> There is no need to indicate an ‘f’ adjacent to category ‘a’ or indeed any other caterer subtype (‘a’ to ‘e’) to indicate that each category is significantly different to takeaways (‘f’) – that is clear from the asterisk adjacent to the takeaway category.

- Institutions include: care homes, hospitals, schools, large business canteens and defence locations.

Throughout the report, bivariate analysis has been used to look at how reported behaviours differ according to business sector, size, country and whether 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. 38% of all sampled food businesses employed 11+ staff; much lower proportions of butchers (5%), bakers (5%), delicatessens (20%) and fishmongers (16%) employ 11+ staff whereas much higher proportions of hotels (52%) and institutions (67%) employ 11+ staff. It is possible, therefore, that some apparent sectoral differences are attributable to differences in their size.

The survey collected a wide range of data and this report does not cover everything. Additional data tables are available in a separate document.

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

### **3 Current information provision practices**

In this chapter, the prevalence and type of information currently provided on allergenic ingredients in food sold loose is presented. Initially, Section 3.1 examines how widespread formal (written) and informal (unwritten) policies are in relation to the provision of food allergen information. Section 3.2 explores the range of food allergens sold in different types of food business and the extent to which information on each of those allergens is provided. The methods used for providing information are also explored, including oral, written and combinations of both. The chapter ends with section 3.3 which investigates whether allergen ingredients are substantiated/audited and how information on allergens is stored and recorded.

## Summary

### ▪ Policy

- 60% of food businesses had a policy on providing allergen information - 41% a formal written policy, 19% an informal, unwritten policy.
- Reasons for not having a policy varied from a lack of awareness about the issues to believing that the onus is on the customer to avoid foods they know to contain food allergens.

### ▪ Allergens information

- Among businesses selling each of the 14 food allergens to be included in the new law, provision of information varied greatly according to the food allergen. The proportion of food businesses providing information on each, whether oral and/or written, was as follows:

nuts – 80%  
other nuts – 81%  
gluten – 75%  
eggs – 62%  
fish – 62%  
milk – 61%  
sesame seeds – 61%  
molluscs - 59%  
crustaceans – 57%  
soybeans – 54%  
lupin - 53%  
mustard - 51%  
celery – 50%  
sulphur dioxide -44%

- **Methods of communication**

- 22% of businesses only provided food allergen information orally.
- 64% provided information both orally and in writing.
- 6% provided only written information.
- 7% provided no food allergen information.

- **Storing food allergen information**

- 62% of businesses retained food allergen information from their suppliers to which they could then refer when consumers made enquiries.
- 13% of businesses labelled all food with allergen information for customers to see.
- 7% checked suppliers' or product websites in response to requests for information.
- 26% of businesses relied on their chef to be aware of all ingredients, or all staff were aware of the content of food and meals sold.
- Retained allergen information was held by some businesses in a designated location - typically in specific folders, kitchen portfolios or staff manuals, accessible to all employees.

- **Auditing information**

- 50% of all food businesses surveyed 'always' checked or audited ingredients from their suppliers or wholesalers; 21% sometimes checked; and 27% never checked.

### **3.1 Food allergen information policies**

Chart 3.1 shows the proportion of food businesses with a written or informal policy on the provision of food allergen information in relation to food sold or served not prepacked. Overall, 60% had such a policy (in 41% of businesses this was a formal written policy while in 19% it was an informal policy). Conversely, 40% of food businesses operate more of an ad hoc approach to providing allergy information for consumers and have no such policy in place.

Differences are evident when comparing different business sectors, whether businesses are part of a chain and business size. Institutions were the most likely to have a policy, whether formal or informal (64%) while caterers were the least likely (58%). Comparing

formal and informal policies, caterers were more likely to operate an informal policy (22%) compared with institutions or retailers (15%).

Within the catering sector, takeaway businesses were the least likely to operate a formal or informal policy (25% and 18% respectively) while restaurants were the most likely (44% and 24% respectively).

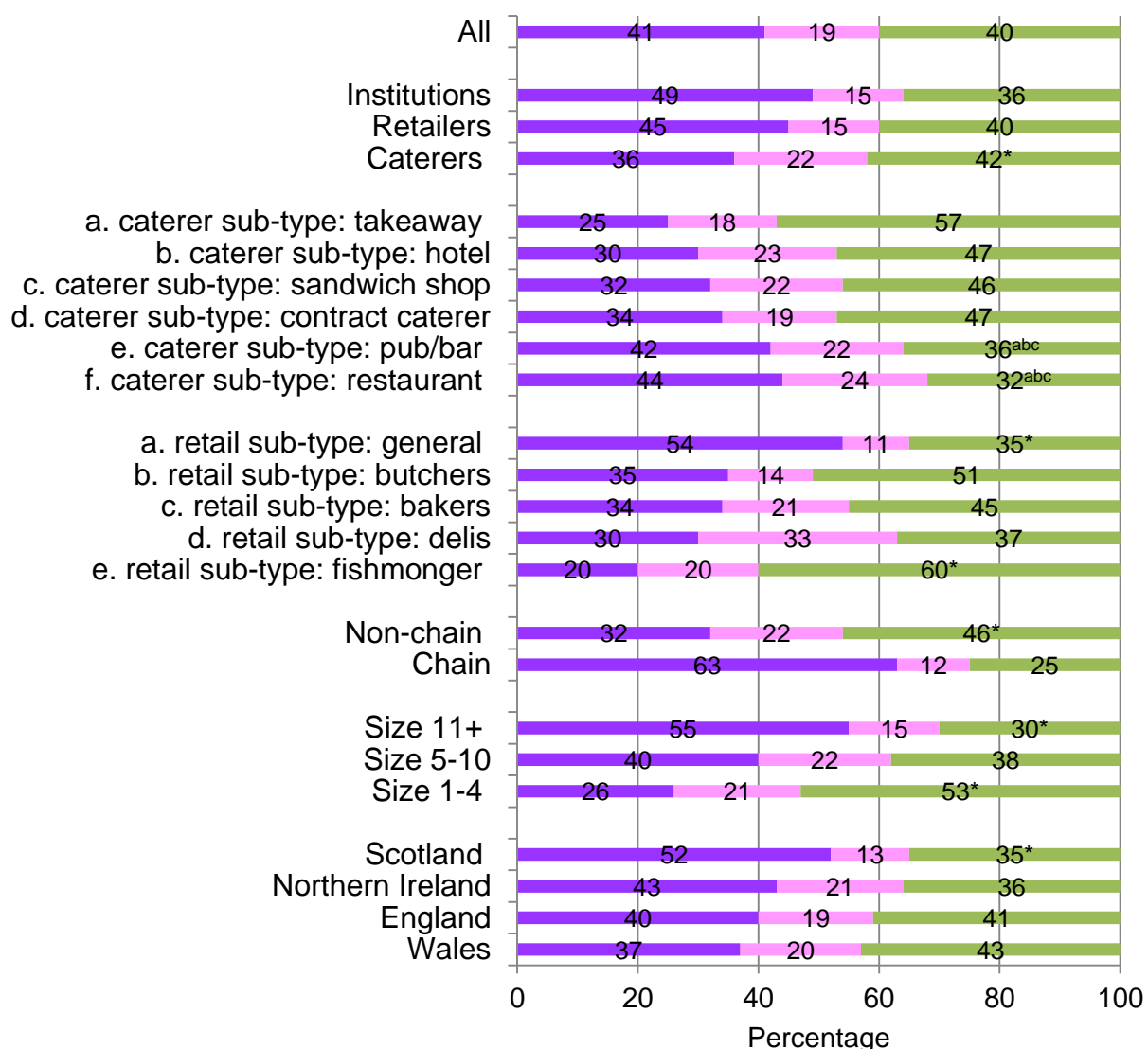
Significant differences were also evident comparing chains with non chains – chain businesses were twice as likely (63%) as non chains (32%) to have a food allergens information policy. Disaggregating findings according to formal and informal policies – chains were twice as likely as non chains to have a formal policy (63% compared with 32%) while 22% of non-chains had an informal policy compared with 12% of chains.

Larger businesses (11+ staff) were also notably more likely to have a formal or informal policy than a smaller business (1-4 staff) (70% and 47% respectively). This difference was accounted for primarily by the incidence of formal policies - evident in 55% of businesses with 11+ staff compared with 26% of businesses with 1-4 staff.

Practices among food businesses in Scotland differed in comparison with England and Wales: businesses in Scotland were more likely to have a formal written policy (52%, compared with 40% and 37% respectively) and less likely to have no policy at all (35% compared with 41% and 43% respectively).



**Chart 3.1: Proportion of food businesses which have a formal written or informal unwritten policy on the provision of food allergen information**



■ Have a formal, written, policy ■ Have an informal, unwritten, policy ■ Have no policy

Base: All (1666); retailer (401); caterer (956); institution (309); butcher (52); baker (50); fishmonger (50); deli (49); general retail (200); restaurant (172); cafe/sandwich shop (199); takeaway (128); hotel (62); pub/bar (268); transport/contract caterer (127); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184)

Q.A1. Do you have a written or informal policy on allergen labelling within your business? A policy is a guideline or procedure for staff to follow

Note: \* denotes a statistically significant difference to all other groups in that category. Where statistically significant differences only apply when comparing some groups within a category these are indicated with lower case letters.

## **Follow up findings – food allergen information policy within food businesses**

In the follow-up research food businesses were asked to provide more information about their policies on provision of allergen information in foods not prepacked to further explore reasons for having a policy, the type of information contained in the policy and how often it was updated. Food businesses spoken to in the follow up research that did have a policy in place indicated that, to a large extent, the detail was determined by the owner / manager's personal depth of knowledge and understanding of allergenic issues and / or the level of experience of customers with allergies or food intolerances.

Policies were recorded within catering manuals or in separate booklets and were said to cover the 'common' allergens notably gluten, nuts (including peanuts) and shellfish and provided staff with some basic guidelines for handling food types that contain those specific allergens.

*'The policy is two A4 sides of paper which informs staff how to handle nuts, shellfish, dairy, gluten and other known allergens. There are sections on reducing the risk of cross-contamination; how to prepare vegan / vegetarian meals and information on the storage of products.'*

(Owner, Sandwich shop, 5-10 staff)

Such policies are typically updated as and when new information becomes available, be it through industry channels customer requests and/ or suppliers when product ingredients change. Amongst those businesses spoken to in the follow up research, there was certainly no regularity in terms of when they review or update their policies and when such an exercise is undertaken, it is invariably a reactive rather than a pre-emptive measure.

*'It would be updated when it would need to be. It hasn't been updated recently, or not for the last eight months. It all depends on what the customers ask about. For example a pregnant lady came in the other week and she wanted to know what kind of mayonnaise we used, so that would be a type of update.'*

(Owner, Sandwich shops and bakeries, 5-10 staff)

Those serving food in pre-schools or care homes that were followed up adopted a slightly more structured approach. In these cases, records appertaining to individual residents' or children's dietary needs are compiled upon registration and referenced by the chef when preparing daily meals.

*'It is basically a catering manual that we have and it says what to do if we have gluten-free patients arriving... With labelling, we have to make sure that we label what certain products are and which residents they are for.'*

(Chef Manager, Care homes, 11+ staff)

Those businesses that did not have either a written or informal policy on allergen information provision were asked why this was the case. Reasons varied from general ignorance (including being new to the industry) to believing that the onus is on the customer to avoid foods they know to contain allergens that they cannot consume.

*'Our position is that those who have got allergies should be the ones who watch what they eat. People have to have a bit of self-responsibility.'*

(Owner / Manager, Sweet shop, 5-10 staff)

Where food was made on-site such a policy was not deemed necessary as staff were considered to be confident about the ingredients in all of the food served and did not require this information to be documented.

*'The reason we don't have a policy is really due to the size and nature of our business. We only have a couple of full-time workers and a couple of part-time employees, so if we are producing anything new then all our staff know what goes*

*into the food. I (owner) am around all the time the shop is open so I am always around to advise what is in the dishes.'*

(Owner / Manager, Sandwich shop, 5-10 staff)

Where allergen information policies were not considered a pre-requisite to the sufficient managing and communication of allergens, there was a general consensus that if it were stipulated that it was a requirement then a policy would be introduced although it would require some time to formulate and would be perceived an additional red-taped burden.

*'I'd be happy to implement a more formal policy but it is about time, to have the time to sit down and write a formal policy.'*

(Owner / Manager, Sandwich shop, 5-10 staff)

### **3.2 Provision of information on 14 food allergens**

To investigate the extent to which food businesses are already providing information on all 14 allergens which will become mandatory by the end of 2014, a two stage question approach was used. Initially businesses were asked whether they actually sell food or meals containing any of the 14 allergens. Businesses were then asked, for each food allergen they sold, whether information was provided for consumers on the presence of the allergen. Among food businesses which sell each of the food allergens, Chart 3.2 shows the proportion of those businesses which provided information on the allergen.

Focussing on the provision of information, which is the key issue for the study, among businesses which sold food including each of the food allergens information was most commonly provided in relation to nuts (by 80% of food businesses which sell food containing nuts) – both peanuts and other nuts. Information on gluten was also quite commonly provided (by 75% of businesses which sold food/meals containing the ingredient). 59-62% of businesses provided information in relation to: eggs; fish; milk; sesame seeds; and molluscs. Information was provided less frequently in relation to: crustaceans (57%); soybeans (54%); lupin (53%); mustard (51%); celery (50%); and sulphur dioxide (44%).

**Case study 1 – Informal policy on allergen labelling (Owner, Sandwich shop, 5-10 staff)**

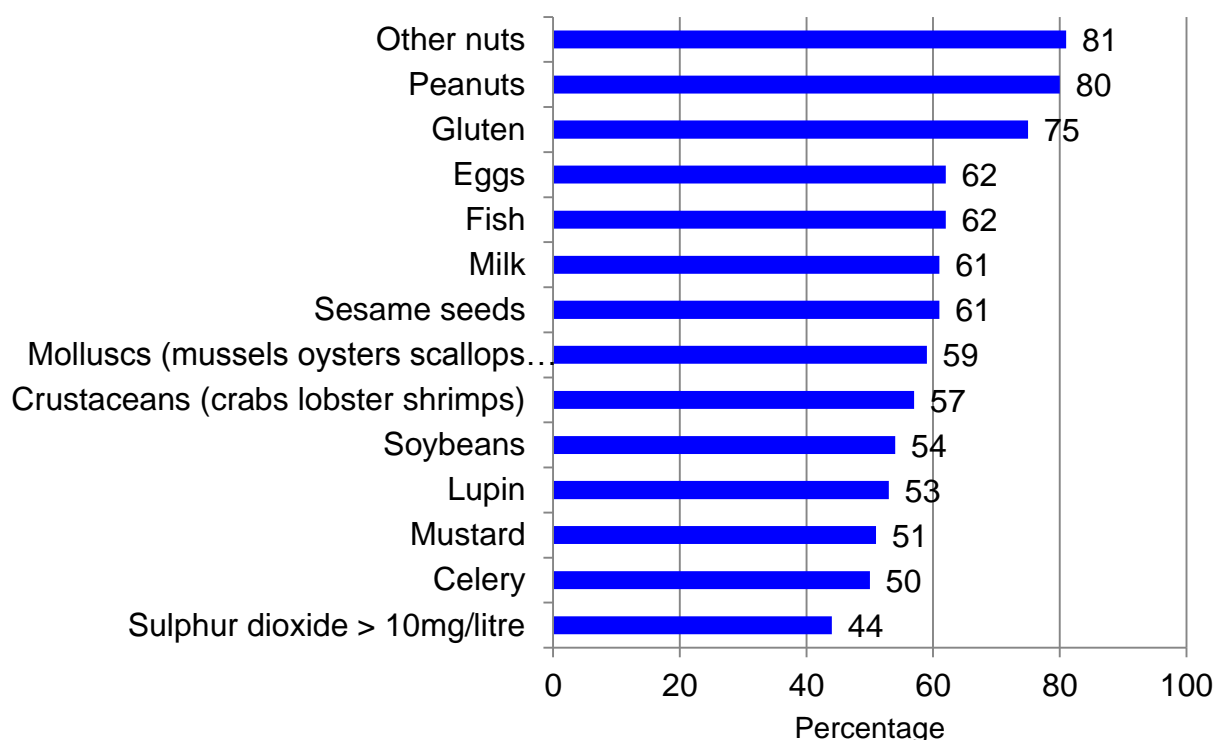
The shop primarily sold sandwiches and rolls, with a choice of various fillings, but also sold cakes, hot pies, sausage rolls, pastries and crisps. The owner was responsible for the overall running of the business and assumed responsibility for allergen labelling. Although the owner stated they had a policy on allergen labelling, they admitted that this didn't involve doing much.

Some of the products sold, such as hot pies and sausage rolls, came pre-wrapped, so already had relevant labelling on. The other products, such as the various sandwich fillings, did not have any labelling on, and instead staff were informed on the ingredients in each of the products. This typically involved telling staff which fillings contained nuts and which fillings didn't include nuts, eggs and prawns. On the whole it was just information on these allergens that were provided to staff proactively. Although, if a customer did ask specifically what one of the sandwich fillings contained then the owner would be able to provide this to the customer reactively.

The owner orally communicated this information to staff, and believed that it was important to provide them with this information as it affected the reputation of the business.

This information was updated when it needed to be and was customer driven.

**Chart 3.2: Percentage of food businesses providing information on the allergenic ingredients that they sell**



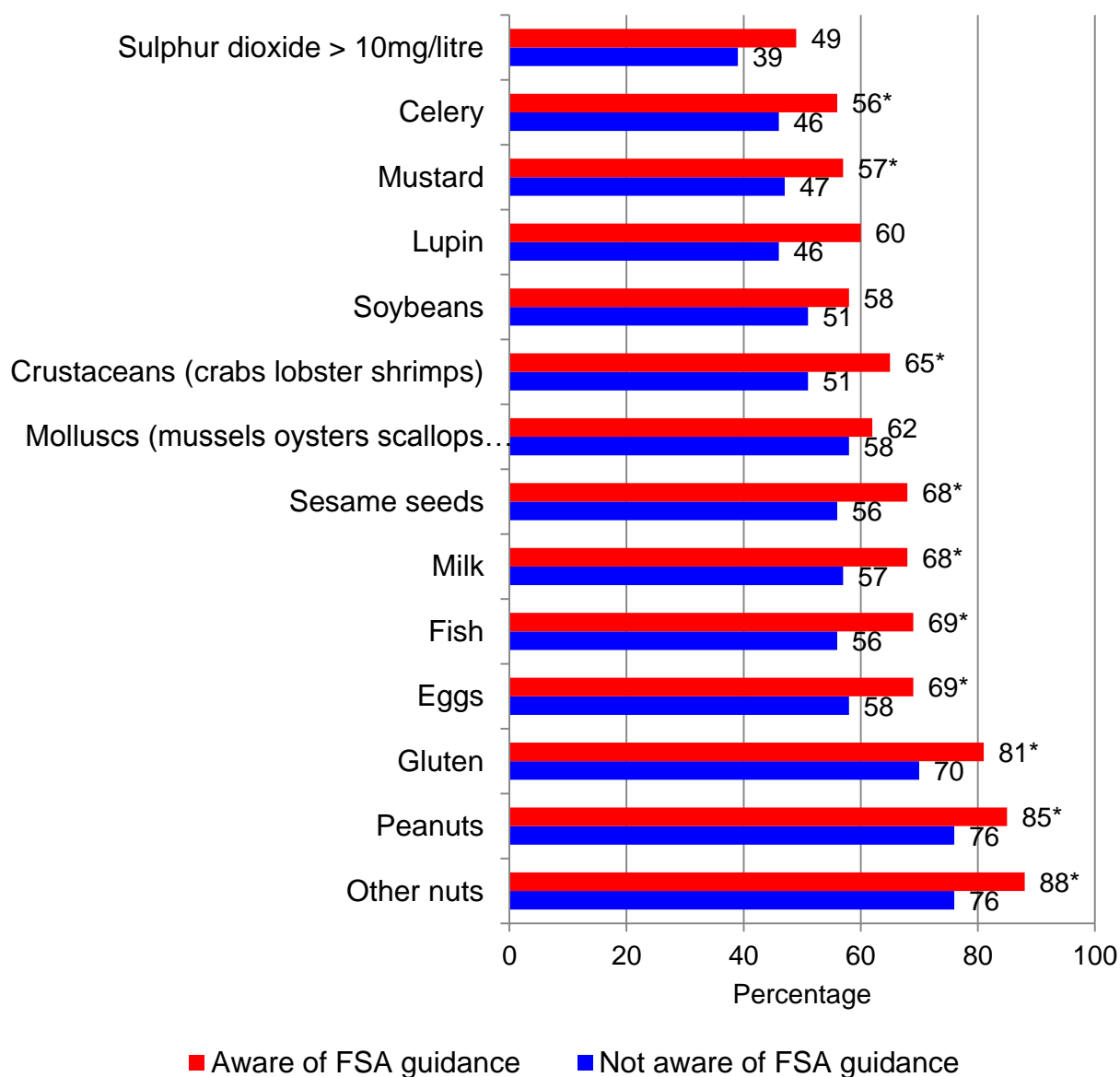
Base: Businesses which sell each food allergen<sup>8</sup>.

Q.A9 Which of the following allergens do you include in the information you provide?  
Multiple choice option

Chart 3.2a highlights differences in the incidence of providing information on each food allergen according to whether the owner/manager was aware of the FSA's voluntary good practice guidance on food allergen information provision. There is a statistically significant relationship between awareness of the good practice guide and provision of information in relation to each of the 14 food allergens (with just 3 exceptions – soybeans, lupin and sulphur dioxide).

<sup>8</sup> The base for each food allergen i.e. the number of food businesses selling each allergen is as follows: gluten (1435); eggs (1426); milk (1386); fish (1175); mustard (1041); other nuts (894); celery (803); sesame seeds (693); peanuts (688); crustaceans (651); molluscs (386); soybeans (381); sulphur dioxide (201); lupin (153).

**Chart 3.2a: Percentage of food businesses which provide information on each food allergen by whether they are aware of the FSA voluntary best practice guidance on allergen information provision**



Base: Businesses which sell each food allergen – see footnote 8 associated with Chart 3.2.

Q.A9 Which of the following allergens do you include in the information you provide?

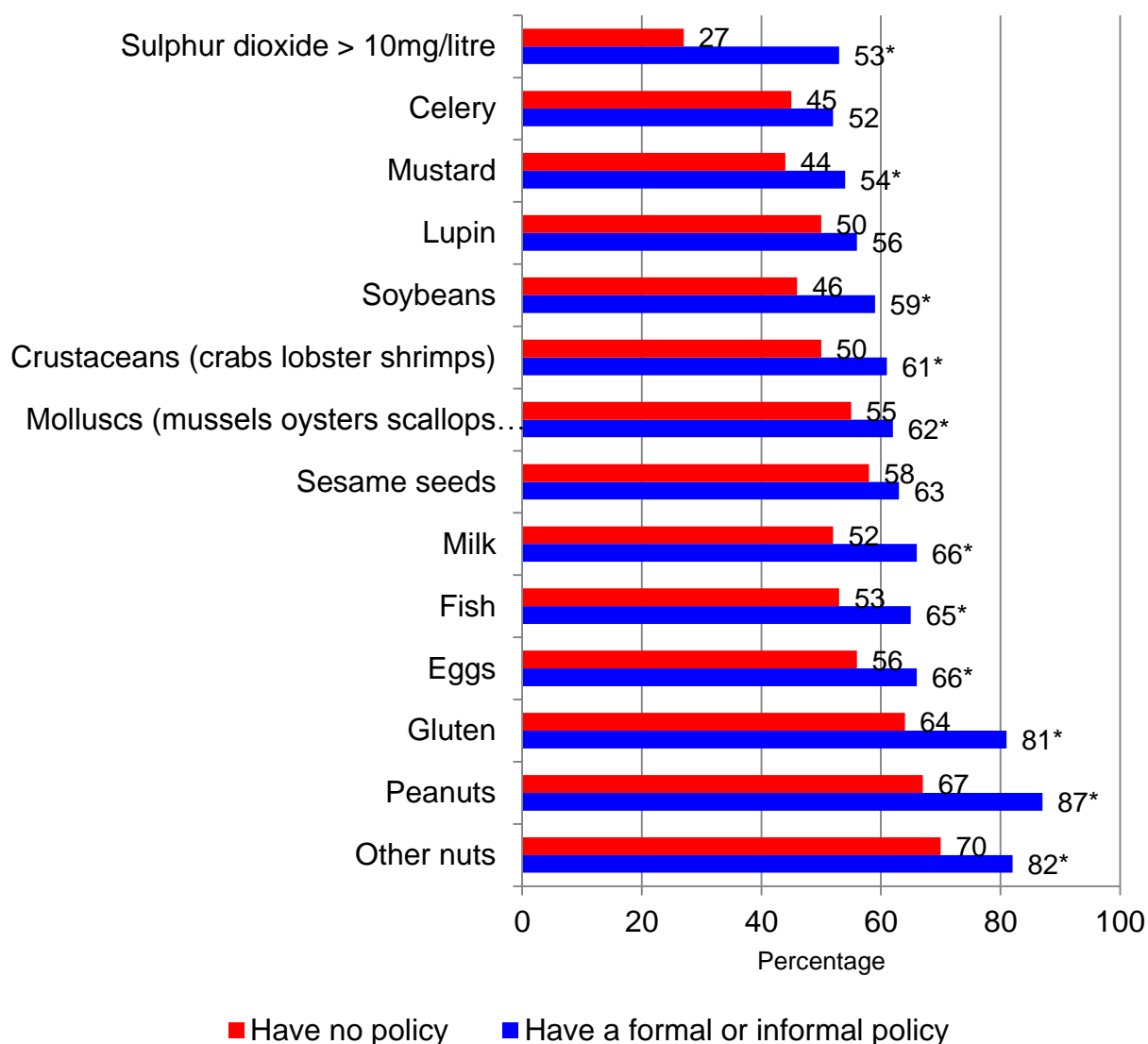
Multiple choice option

Note: \* denotes a statistically significant difference



Chart 3.2b highlights differences in the incidence of providing information on each food allergen according to whether the food business had implemented a policy in relation to the provision of information on food allergens. The graph differentiates businesses with no policy from those with either a formal or an informal policy. There were no significant differences in the incidence of information provision on each allergen according to whether the policy was formal or informal – these groups were therefore conflated. There is a statistically significant relationship between having a policy and provision of information in relation to each of the 14 food allergens (with just 3 exceptions – sesame seeds, lupin and celery). Having an allergens information policy therefore signals more of an engagement with food allergen issues reflecting, in turn, information provision practices.

**Chart 3.2b: Percentage of food businesses which provide information on each food allergen by whether they have a formal/informal policy on allergen information provision**



Base: Businesses which sell each food allergen - see footnote 8 associated with Chart 3.2

Q.A9 Which of the following allergens do you include in the information you provide?

Multiple choice option

Note: \* denotes a statistically significant difference

In terms of differences according to business type, shown in Table 3.2, retailers were significantly more likely to provide information on gluten and celery compared with caterers and institutions; caterers were most likely to provide information in relation to molluscs yet least likely to provide information on eggs and milk; institutions were the least likely to provide information on sesame seeds and mustard. No statistically significant differences by business size and country were evident.

**Table 3.2: Percentage of each food business type providing information about each of the food allergens they sell**

	Business type			Business size		
	Caterers	Retailers	Institutions	1-4	5-10	11+
Cell percentages						
Other nuts	80	85	82	78	83	82
Peanuts	80	86	73	74	85	80
Gluten	73	83*	74	70	76	77
Eggs	59*	69	66	61	59	66
Fish	62	61	62	60	61	63
Milk	58*	67	66	59	60	64
Sesame seeds	62	68	49*	63	60	60
Molluscs	61*	50	54	55	56	65
Crustaceans	57	57	54	56	55	58
Soybeans	52	64	54	52	46	59
Lupin	58	61	33	67	52	48
Mustard	53	60	39*	54	54	48
Celery	51	61*	46	54	53	47
Sulphur dioxide	48	56	28	42	46	43

Base: Businesses which sell each food allergen - see footnote 8 associated with Chart 3.2

Q:A9 Which of the following allergens do you include in the information you provide?

Multiple choice option

Note: \* denotes a statistically significant difference to all other groups in the category

In terms of differences within the catering sector, shown in Table 3.2a, statistically significant differences in practice between establishment types apply to all ingredients apart from peanuts, other nuts and mustard. In relation to each of the ingredients shown, restaurants were the most likely to provide information for their customers while hotels were the least likely. Cafes were also among the least likely to provide information in relation to molluscs, fish, sesame seeds, milk and soybeans. Takeaways were among the least likely to provide information in relation to gluten, molluscs and celery.

**Table 3.2a: Catering food business type providing information about each of the food allergens they sell**

	a. Restaurant	b. Cafe	c. Takeaway	d. Hotel	e. Pub	f. Contract/ transport caterer
Cell percentages						
Other nuts	82	84	79	73	75	80
Peanuts	84	79	80	70	81	81
Gluten	82	72	63 <sup>af</sup>	63 <sup>af</sup>	71	80
Eggs	69 <sup>*</sup>	57	57	45	57	61
Fish	73 <sup>bd</sup>	49	62	50	64	62
Milk	70 <sup>bd</sup>	52	54	49	57	60
Sesame seeds	69	50 <sup>ac</sup>	74	55	61	57
Molluscs	72 <sup>bcd</sup>	37	46	44	62	64
Crustaceans	69	51	57	39 <sup>a</sup>	54	56
Soybeans	71	39	55	42	43	58
Mustard	61	48	48	49	53	60
Celery	60 <sup>cd</sup>	49	29 <sup>ae</sup>	43	50	49

Base: Businesses which sell each food allergen - see footnote 8 associated with Chart 3.2

Data relating to lupin and sulphur dioxide are not shown as all sample sizes were <30.

Q:A9 *Which of the following allergens do you include in the information you provide?*

Multiple choice option

Note: \* denotes a statistically significant difference to all other groups in the category

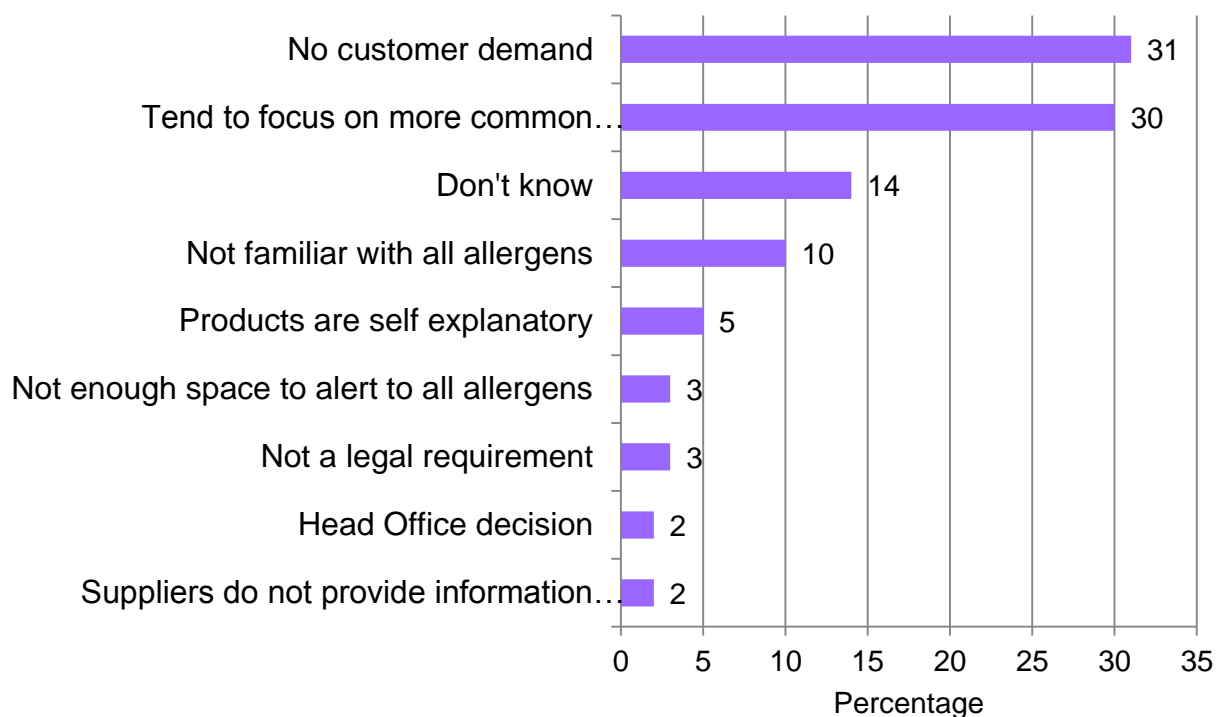
Statistically significant differences between just some groups within the category are denoted with lower case letters.

Given the disparity in information provision relating to each of the 14 food allergens, businesses were asked why they provided information on some allergens but not others. Their responses are reported in Chart 3.3. The two most common explanations, each given by 30- 31% of businesses which did not provide information on all food allergens sold was that customer demand did not require information on the full range of food allergens and that the business focussed only on the more common food allergens. Information practices therefore reflect the perception that allergies to nuts are more widespread than other allergies and businesses were therefore more familiar with this form of allergy. 14% of survey respondents did not know why information was restricted to just some allergens, while 10% acknowledged that they were not familiar with all allergens. Local Authorities and/or the FSA may therefore need to invest resources in promoting awareness of the full range of food allergens among food businesses in order to effect full compliance over the coming year or so.

Much smaller proportions of businesses (5% or fewer) cited the following reasons for only providing information on some food allergens:

- products are self explanatory;
- inadequate space on labels to list all allergens;
- head office decision;
- and lack of information from suppliers on the full range of allergens.

**Chart 3.3: Reasons for providing information on some food allergens but not others**



Notes: Q:A10. *Why do you provide information on some allergens but not others?*

Base: 920 food businesses which provide information on some but not all food allergens

In relation to the provision of information of the 14 allergens no statistically significant differences were observed between the 4 countries of the UK.

### **Follow up findings – provision of allergen information**

As part of the follow-up research, food businesses were invited to explain in more detail why they did or did not provide their customers with allergen information. Reputational risk was the key driver for those working in the food industry to provide information to their customers or clients about the allergens contained within the food they sell or serve.

*'I think it is very important to provide customers with information – it is all part of running a business, or rather the reputation of the business'*

(Owner / Manager, Sandwich shop, 5-10 staff)

For some businesses included in the follow up research the fear of reputational damage meant that they adopted a blanket approach to providing information. Consequently they advised their customers that they are not able to guarantee complete separation of ingredients (and therefore against cross contamination of allergens). In these instances, businesses feel they have warned their clients sufficiently for them to make an informed decision about what to purchase.

*'Basically we inform customers that we cannot cater to specific allergens. The kitchens on board are so small and we are producing so much food and different varieties of menu that you just couldn't guarantee that it hasn't been stored next to something else. You wouldn't put yourself in that position.'*

(Operation Support Manager, Transportation catering, 11+ staff)

*'We have a blanket policy where if somebody comes in here and says 'Josephine's got a nut allergy or gluten allergy what would be suitable?' I'd tell them that you buy them at your own risk because we don't know if there are traces on them, picked up, along the way, on the production line. I have to do this to cover my own arse because if I say no there isn't and Josephine has a fit outside then they'll want to come in here and sue me.'*

(Owner, Sweet shop, 1-4 staff)

Other businesses termed the provision of information as 'good practice', or indicated that they provided information to protect their customers or spoke of their duty of care to their clients.

*'As and when new information [about allergens] comes out we are obliged to pass that on to parents. But it is also for our benefit because we would hate to give the children anything that they would be allergic to. I suppose it is our duty of care as well.'*

(Manager, Pre-school, 11+ staff)

In addition to providing information on common allergens such as nuts, gluten, dairy and shellfish, some businesses included in the follow up research provided further information in instances where they believed the presence of an allergen in a food to be concealed or not immediately obvious to a customer. Conversely, a number of businesses stated that they did not provide information on all allergens because the presence of an allergen was considered obvious, for example through the name of the meal.

*'In some cases the meal names are self-explanatory e.g. "mustard chicken" – it is clear the recipe contains mustard and therefore a label isn't required. I am relying on people's common sense. It is just the hidden ingredients - like dairy in a sauce - that I specify on the menu.'*

(Owner / Manager, Sandwich shop, 5-10 staff)

Where businesses did not provide any information on allergens to their customers, one explanation given was that this was due to the nature of the sector within which they operated. Pre-schools and care homes were more likely to have processes in place that recorded clients' allergens on arrival thereby any unsuitable foods are avoided at all times. Additionally, it was felt that the provision of allergen information was not possible with these particular client groups given their age or illness which may limit understanding.

*'What you have to remember here is we're not just a nursing home. A lot of our residents have brain injuries or are suffering from Dementia which makes it difficult to provide information.'*

(Head Chef, Care home, 11+ staff)

Alongside explaining the information provided to consumers in relation to allergens, food businesses taking part in the follow-up research were presented with a hypothetical situation and asked how they would respond if a customer came to them explaining that they had an allergy. There was some variation in the manner in which food businesses said they would respond to individuals' needs which included trying to cater to their customers' needs, limiting the numbers of options available, working through the menu with the customer to identify which foods would be suitable and cooking an alternative meal as and when individual requests were made.



*'I would respond by telling them what's on the menu – they could choose something and I could advise them if they were allowed to have that product.'*

(Manager, Chinese / Indian restaurant / takeaway, 5-10 staff)

*'Depending on the extent of the allergies, we advise what dishes contain certain ingredients in person. If they have a number of allergies then I will go through the menu with the customer and identify the dishes they can and cannot have.'*

(Business Partner, Sandwich shop, 5-10 staff)

Those food businesses that produce the majority of the food they serve or sell on-site have greater flexibility in being able to commit to providing alternative meals or tweaking existing recipes to make them suitable for customers with specific allergies.

*'When customers phone up and book we would say "What is it that you can't eat? What would you normally buy? Right we will get hold of that for you."'*

(Assistant Manager, Hotel, 1-4 staff)

*'If on that day I don't have any meals that do not contain that specific allergen and I do have time, then I'll say "Ok you wait a bit longer and I'll make a sauce for you without [allergen]" - I have got that flexibility. Customers know we go out of our way to give them what they want.'*

(Owner, Sandwich shop, 5-10 staff)

Where food businesses had the time and flexibility to respond to these requests, they were considered relatively straightforward to deal with.

*'I don't think it is difficult to respond to them, I suppose it is because I know what's in the menu.'*

(Manager, Chinese / Indian restaurant / takeaway, 5-10 staff)

In cases where food businesses relied on the allergen information provided to them by suppliers or manufacturers, they refrained from providing customers with an alternative or signposting customers to appropriate meal selections.

*'We cannot guarantee that the food doesn't contain a specific allergen all we can say is that we have been advised by the caterer that the food doesn't contain that allergen. To be quite honest, if it is something that could be quite dangerous we recommend that the passengers take their own food with them.'*

(On Board Product and Quality Manager, Transportation catering, 11+ staff)

*'I would say I am very sorry to hear that but I can't guarantee that anything in this shop hasn't got trace elements in it and then it is down to the customer.'*

(Owner, Sandwich Shops and Bakeries, 1-4 staff)

In the cases of care homes and pre-schools where dietary requirements are generally recorded upon registration, menus are tailored using this information in order to cater for individuals with known allergies. Health plans and records are updated as individuals' diets change.

*'I just cater to their individual needs. I would look at the recipe again to see if I can adjust it in any way.'*

(Chef Manager, Pre-schools, 11+ staff)

*'We would receive that information [about a resident's allergies] as soon as that person came into the home. We would speak to the chef and if we needed to order in specific foods for that individual. It wouldn't be a difficult thing to do and it is something that we would have to do from the start.'*

(Chef Manager, Care home, 11+ staff)

**Case study 2 – No formal policy on allergen labelling but did provide information to customers on allergens (Owner, Delicatessen, 5-10 staff)**

The business was owned by a husband and wife partnership who ran all aspects of the business and employed a handful of staff. The delicatessen sold a lot of cheeses, processed foreign meat, general continental deli items and freshly made 'ready meals' for people to take away. The delicatessen also doubled as a café where customers could purchase homemade cakes and a range of meals which changed from day to day.

When customers enquired about allergenic ingredients in products the business was more than happy to provide detailed information on ingredients to customers as they didn't want a customer to have a bad reaction to anything that they had produced, if it was avoidable. In response to a customer explaining they were allergic to a certain ingredient or food type the business would advise the customer which products and dishes contained certain ingredients in person. If the customer had a number of allergies then they would go through the menu with the customer and identify the dishes and products that they could and couldn't have on a one to one basis.

The main allergens that the business tended to provide information on was gluten, dairy and nuts, the allergens that the owner termed were 'the common ones'. The owner often received requests from customers to avoid certain foods due to allergies that were not among the 14 allergens listed in the new legislation. These included foods such as tomatoes and cucumber. The owner was sceptical that rather than these requests being due to allergies, they were more likely to simply be in relation to customer's likes and dislikes. Despite this, the owner was more than happy to ensure that certain ingredients were not present if requested by customers. Queries such as this

### **3.3 Methods used to inform consumers about food allergens**

Survey participants were asked which methods they use to inform customers about ingredients and potential food allergens. Table 3.3 presents findings which differentiate between information delivered orally only, written only and both oral and written. A small minority of just 7% of businesses stated that no allergen information is provided for customers. 22% of businesses only provided information orally while 64% provided information both orally and in writing (whether on menus, information sheets or labels). 6% provided only written information. In total, 70% of food businesses provided written information and 86% provided information orally.

While the 20% of businesses which only provided information orally may be compliant with the new legal requirements, evidence from a study examining food choices among nut allergic consumers (FSA, 2009) highlighted that the oral approach is not favoured by all consumers as many are embarrassed to draw attention to their allergies in public settings such as restaurants. For these individuals, access to written information is therefore important and more socially comfortable.

Significantly different approaches are evident among businesses of different size, type, location, whether they operated with a formal or informal food allergen policy and whether they were aware of the FSA good practice guidance in relation to allergen information. Looking first at country, England and Wales are more likely to only provide information orally (23% and 21%) compared with Scotland and Northern Ireland (14% and 12%) – the latter were more likely instead to provide information both orally and in writing.

The smallest businesses (with 1-4 staff) were notably more likely to either not provide any information on food allergens (11% compared with 5-6% in businesses with 5-10 or 11+ staff) or to only provide information orally (27% compared with 15% of businesses with 11+ staff).

Compared with caterers and retailers, institutions were the most likely to say they do not provide any information on food allergens (12% compared with 7% of retailers and 5% of caterers). Similar proportions of all three sectors provided information both orally and in writing.

With reference to chains, these food businesses were more likely than non-chains to provide information both orally and in writing (72% and 62% respectively). 26% of non-chains provided information orally only compared with 9% of chains.

Information provision practices also differed within catering sub-groups. Restaurants were the most likely to provide information orally and in writing (71%). Takeaways and sandwich shops were more likely than other business types to only provide information orally.

Other notable differences among the catering sub-groups relate to lack of information – among caterers, providing no information to consumers was most common in takeaways and hotels (9%) and least common in restaurants and pubs or bars (3% in each case). Among retailers, compared with an average of 7%, 14% of fishmongers and 9% of butchers did not provide allergen related information.

Food businesses which were aware of the FSA best practice guidance were: less likely to only provide oral information (17% compared with 26% among food businesses unaware of the guidance); and more likely to provide both oral and written information (71% compared with 59% of businesses unaware of the guidance).

Food businesses which had implemented either a formal or informal allergen information policy were: less likely to only provide oral information (13% compared with 36% among food businesses without a policy); and more likely to provide both oral and written information (75% compared with 48% of businesses without a policy).

Of the 1666 food businesses surveyed only 7% did not provide any information on food allergens. Reasons cited by these businesses for not providing information included: 'no need' (42%); do not believe it is required (21%); rely on customers to ask (16%); no awareness about allergens (7%); it is not a legal requirement (2%); 'don't know' or no response (12%).

**Table 3.3: Methods used to provide information on food allergens**

	Oral only	Written only	Oral and written	No information	Don't know	Base
Row percentages						
All	22	6	64	7	1	1666
b. Scotland	14	11	72	4	0	198
c. Northern Ireland	12	8	74	4	1	152
d. Wales	21	8	63	8	0	154
Size 1-4*	27	5	57	11	..	586
Size 5-10	24	6	65	5	1	452
Size 11+	15	6	70	6	2	613
Caterers*	27	4	64	5	0	956
Retailers	16	13	64	7	0	401
Institutions*	14	6	65	12	4	309
Chain*	9	10	72	8	2	479
Non-chain	26	5	62	7	1	1184
Aware of FSA guidance*	17	6	71	6	1	626
Unaware of FSA guidance	26	6	59	8	1	997
Food Allergen policy*	13	7	75	5	1	999
No policy in place	36	5	48	11	1	616
<b>Caterer sub-type</b>						
a. Restaurant*	19	7	71	3	0	172
b. Sandwich shop	33	2	59	6	0	199

c. Takeaway	31	3	57	9	0	128
d. Hotel	24	2	65	9	0	62
e. Pub/bar	25	3	69	3	0	268
f. Contract caterer	26	9	61	4	1	127

**Retail sub-type**

a. Butcher	19	10	62	9	0	52
b. Baker <sup>c</sup>	15	0	78	7	0	50
c. Fishmonger	31	8	48	14	0	50
d. Delicatessen	30	2	64	3	0	49
e. General retail <sup>bcd</sup>	14	19	61	7	0	200

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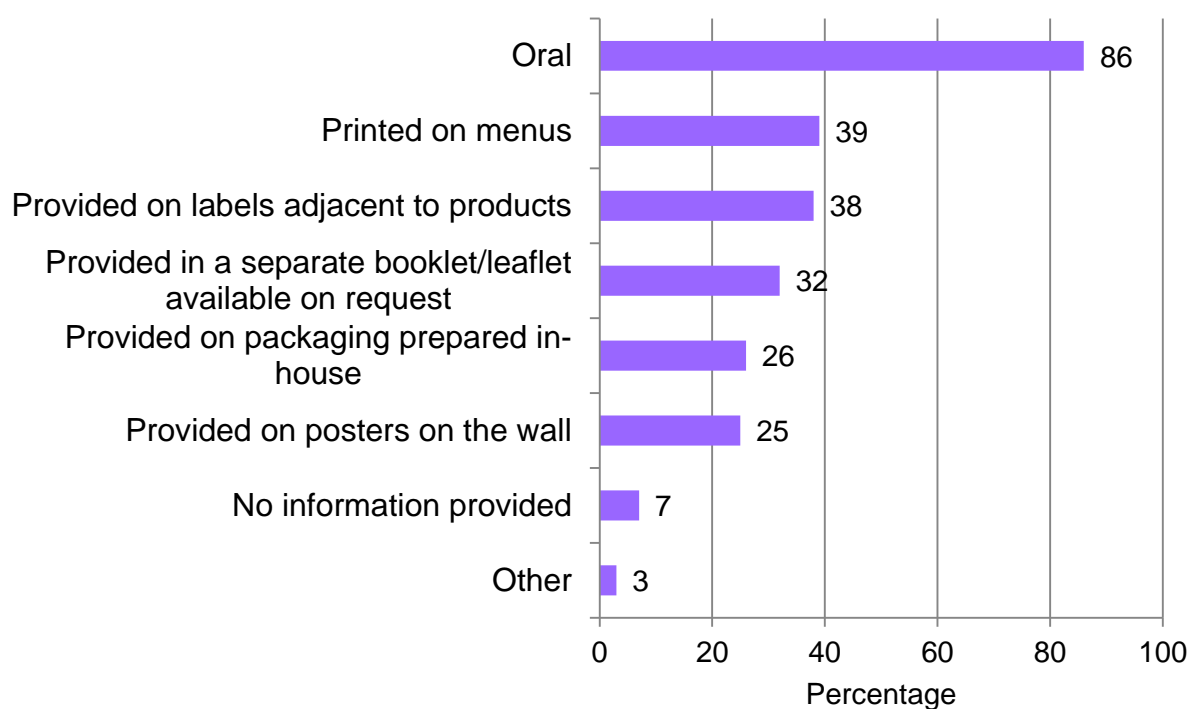
Note: Q.A5 “Do you provide information on food allergens using any of the following methods.”

Note: \* denotes a statistically significant difference to all other groups in the category

Statistically significant differences between just some groups within the category are denoted with lower case letters.

Chart 3.4 breaks down the type of information provided by businesses, differentiating written information presented on menus, in separate booklets, on packaging prepared in-house and provided on wall posters. Many businesses provided information in multiple formats. Aside from oral information which, as indicated above, was provided by the vast majority of businesses (86%), the most common sources of information were written menus and labels adjacent to products (provided by 39% and 38% of businesses respectively). 32% of businesses provided information in separate booklets (see Appendix 1 for an example of this type of information); 26% provided information on packaging prepared in-house; and 25% provided posters on walls.

**Chart 3.4: Methods used to provide information on food allergens**



Base: 1666

Note: Q:A5. "At the moment do you provide information on food allergens using any of the following methods." Multiple response option



**Table 3.4: Methods used to provide information on food allergens within different business types and by country**

	Wall posters	In-house packaging	Separate leaflet	Labels adjacent to products	On menus	Base
Cell percentages						
Size 1-4	19	21	23	35	29	586
Size 5-10	26	27	27	36	41	452
Size 11+	30	30	45	42	44	613
Caterers	20	21	26	32	46	956
Retailers	23	43	23	62	15	401
Institutions	40	26	52	36	37	309
<b>Caterer sub-type:</b>						
Restaurant	23	20	35	31	61	172
Sandwich shop	24	19	21	38	35	199
Takeaway	23	20	27	20	30	128
Hotel	15	22	16	33	52	62
Pub/bar	13	22	27	30	58	268
Contract/Transport caterer	16	26	26	42	33	127
Chain	34	36	48	50	46	479
Non chain	22	22	27	34	36	1184
England	24	26	31	37	38	1162
Scotland	35	27	47	46	44	198
Northern Ireland	38	33	35	41	46	152
Wales	29	27	32	39	31	154

Base: 1666

Note: Q:A5. “*At the moment do you provide information on food allergens using any of the following methods.*” Multiple response option

Table 3.4 indicates variation of practice in relation to written information within different business types. Small businesses employing 1-4 staff were the least likely to report using any of the written sources of information while the largest businesses employing 11+ staff were the most likely to use the full range of written materials.

Differences according to business type were also evident. Wall posters and separate booklets/leaflets were most commonly used in institutions, labels adjacent to products and in-house packaging with food allergen information was most common among retailers, and provision of written information on menus was most widespread among caterers.

Among the caterer sub-types the most notable differences were in the incidence of using separate booklets, labels adjacent to products and menus. The use of separate booklets or leaflets were most common among restaurants (35%) and least widespread in the hotel sector (16%). Use of labels adjacent to products were most widespread among contract and transport caterers (42%) and least widespread among takeaway businesses (20%). Information provided on menus was most often reported by restaurants (61%) and least often by takeaways (30%).

Compared with non-chains, chain businesses were more likely to use each of the methods of providing written information.

There were two statistically significant differences between the 4 countries, specifically: the use of posters was most common in Northern Ireland (38%) and least common in England (24%); while food businesses in Scotland were more likely at 47% to use separate booklets and leaflets compared with other countries (which ranged from 31%-35%).

## **Different food types**

The study aimed not only to identify whether different practices were evident among different types of business, but also to identify whether practices differed in relation to different food types (for example, sandwiches, soups, pizzas or other meals/products). Survey findings suggest that while food allergen information provision does differ within different sectors and business sizes, as discussed above, within businesses practices tend not to vary according to the type of food sold.

The survey asked business owners/managers whether they used the same approach to providing information for all the food types sold. The vast majority – 92% – affirmed the same approach was used.

The survey also asked food businesses which did use different methods for different food types whether there were some food types for which there was no accompanying written allergen information (for example, packaging, labels, posters, leaflets or any other) – only 34 food businesses affirmed this was the case (too small a group to warrant further investigation).

## **Follow up findings – provision of oral information only**

A sample of those business that indicated they *only* provided information on allergens orally in the initial telephone survey were included in the follow-up research to further explore reasons for only providing information in this way and identify any barriers to provision of written materials.

In some cases it was stated that written information was not commonly requested by customers and that when it was, only oral advice was sought. Accordingly, these businesses responded as and when customers asked questions (in part to also avoid burdening the customer with too much information).

*'A person who comes out for dinner does not come out for loads of advice. I don't think providing written information is necessary and I don't think the customer would like to have lots of information like you get on packaging in the supermarkets'*

(Owner / Manager, Chinese / Indian restaurant / takeaway, 5-10 staff)

Others simply felt that providing information in writing was not practical given the space that would be required on the menu to adequately provide enough detail about every meal. This was an especially pertinent issue among restaurants, takeaways, sandwich shops and bakeries interviewed as part of the follow-up.

*'My labels aren't that big so I'd be hard pushed to fit any more information on the labels'*

(Manager, Sandwich shop, 5-10 staff)

### **3.4 Checking food allergen ingredients – how ingredient information is recorded, stored and audited**

In this section two issues are addressed. The first examines how food allergen information is recorded and stored and therefore how readily information is available for retrieval should a consumer have a query regarding a specific food allergen (section 3.6.1). The second examines substantiation of ingredients purchased from suppliers, exploring whether food businesses conduct audits or less formal checks of the food and ingredients they purchase (section 3.6.2).

#### **3.4.1 Storing information**

Table 3.5 highlights the methods used by food businesses to check for the presence of allergens if asked by a customer. The majority (62%) retained information from their suppliers to which they could then refer. Everything was labelled for customers (e.g. on menu or shelf tag) to see in 13% of food businesses while 7% checked suppliers' or product websites. 26% relied on their chef to be aware of all ingredients, or all staff were aware of the content of food and meals sold. 6% of the businesses which relied on their chef or staff to be aware of ingredients also retained information from suppliers, checked websites or labelled all products/meals. 17%, however, *only* relied on the knowledge and recall of their chef or staff.

Within the catering sector different information storage practices were evident. Restaurants and hotels were particularly likely to rely on their chef or staff to recall ingredients in meals (47% and 44% respectively) while sandwich shops and takeaways were least likely to use this method (22 and 21%). The latter were particularly likely instead to retain information from suppliers for subsequent reference (67% and 70% respectively). Contract caterers were the least likely to retain information from suppliers (47%) but were the most likely, if asked, to check websites or contact their suppliers directly (11%).

The retail sector also exhibited some variety in practices. Butchers and fishmongers were the least likely to retain information from suppliers (49% and 42%), 18% of butchers would call their suppliers directly or checked on websites instead while 12% labelled everything for customers to see. By contrast, fishmongers were more likely to label everything (26%) while only 2% would check websites or contact their suppliers. Within the retail sector Delicatessens exhibited the highest likelihood of both retaining supplier data (78%) and of relying on a chef or all staff to be knowledgeable (18%).

Practices do not differ significantly by country or whether the business is a chain.

**Table 3.5: Methods used to check for the presence of allergenic ingredients**

	Retain information from suppliers (%)	Ask the chef or all staff aware (%)	Everything labelled for customer (%)	Check websites or supplier (%)	N
Cell percentages					
<b>All</b>	<b>62</b>	<b>26</b>	<b>13</b>	<b>7</b>	<b>1666</b>
a. Caterers	61	33*	10	6	956
b. Retailers	58	10	19 <sup>a</sup>	10	401
c. Institutions	68 <sup>b</sup>	23*	14	8	309
<b>Caterer subgroups</b>					
a. Restaurant	55	47 <sup>bcef</sup>	6 <sup>b</sup>	6	172
b. Sandwich shop	67	22 <sup>ade</sup>	13	8	199
c. Takeaway	70 <sup>adf</sup>	21 <sup>ade</sup>	12	4	128
d. Hotels	55	44	11	3	62
e. Pubs and bars	64	35	9	5	268
f. Caterers	47	30	12	11	127
<b>Retail sub-groups</b>					
a. Butchers	49	9	12	18	52
b. Bakers	59	21	6 <sup>cde</sup>	11	50
c. Fishmongers	42	18	26	2	50
d. Delicatessen	78*	20	19	4	49
e. General retail	57	4 <sup>bcd</sup>	25	9	200
<b>Size</b>					
1-4	59	19	13	5	586
5-10	67	24	10	3	452
11+	63	26	14	6	613

England	62	27	13	7	1162
Scotland	63	24	12	9	198
Northern Ireland	67	21	11	9	152
Wales	63	30	11	12	154
Chain	65	21	15	6	479
Non chain	61	29	12	7	1184

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Q:A17. *What methods do you and your staff use to check for the presence of allergenic ingredients if asked?* Multiple response option. 3 businesses have missing data on whether a chain, 15 businesses having missing size data. Note: \* denotes a statistically significant difference to all other groups in the category. Statistically significant differences between just some groups within the category are denoted with lower case letters

Table 3.6 shows which individuals within food businesses held final responsibility for the provision of allergen information to consumers. Virtually all businesses were able to identify where responsibility lies, with just 1% stating that nobody was responsible. The owner/manager was most often identified as responsible (in 59% of businesses) followed by the Head Chef (in 34% of businesses). Responsibility was less clear cut in 12% of businesses where 'all staff' were held responsible. In 4% of businesses Head Office held ultimate responsibility.

Responsibility lay with Head Office among retailers (11%) to a greater extent than in catering establishments (4%) or institutions (1%). Institutions were most likely to allocate responsibility for food allergens with Head Chefs (50% compared with 35% of caterers and 4% of retailers). Caterers and retailers assigned responsibility primarily to owners/managers (64% and 69% respectively) compared with 42% of institutions.

Within the catering sector, for the majority of sandwich shops, takeaways and contract caterers, owner/managers were responsible for food allergen information (75%, 81% and 78% respectively). In the majority of hotels (70%) the Head Chef was responsible. In restaurants there was a fairly even split with owner/managers responsible in 55% of businesses and Head Chefs responsible in 57% of businesses.

In terms of business size, the larger the business the more likely responsibility lies with the Head Chef and the less likely with the owner/manager. In businesses with fewer than 5 staff, 74% assigned responsibility to the owner/manager compared with 64% in businesses with 5-10 staff and 44% in businesses with 11+ staff.

Within 15% of chain businesses Head Office was responsible for checking food allergens, compared with less than 0.5% in non-chains. Owner/managers were responsible in 47% of chain businesses compared with 64% of non-chains. Chains also exhibited the highest incidence of 'all staff' holding responsibility – 18% compared with 10% in non chains.

No statistically significant differences were observed between the 4 UK countries.



**Table 3.6: Individuals responsible for checking the presence of allergenic ingredients if asked**

	Head Office (%)	Owner/ Manager (%)	Head chef (%)	All staff (%)	No-one (%)	N
Cell percentages						
All	4	59	34	12	1	1666
Caterers	4*	64	35	10	1	956
Retailers	11	69	4*	15	3	401
Institutions	1*	42*	50*	16	1	309
<b>Caterer sub-type</b>						
a. Restaurant	4	55	57 <sup>bcd</sup>	9	1	172
b. Sandwich shop	2	75	19	15	0	199
c. Takeaway	6	81 <sup>ade</sup>	8*	12	2	128
d. Hotels	0	39 <sup>abcf</sup>	70 <sup>bcef</sup>	4	0	62
e. Pubs and bars	8	54	46 <sup>bcd</sup>	6	1	268
f. Contract caterers	1	78	20	5	0	127
<b>Size</b>						
1-4	<0.5*	74*	21*	10	1	586
5-10	4	64	31	13	2	452
11+	8*	44*	48*	14	1	613
Chain	15*	47*	33	18*	1	479
Not chain	<0.5	64	35	10	1	1184

Notes: Q:A18, *Who at your establishment has formal responsibility for checking allergen ingredients?* Multiple response option

Note: \* denotes a statistically significant difference to all other groups in the category

Statistically significant differences between just some groups within the category are denoted with lower case letters

### **Follow up findings – Storing and updating allergen information**

As part of the follow-up research, food businesses were asked in more detail about how they store and update any allergen information held. Allergen information was generally held in a designated location - typically in specific folders, kitchen portfolios or staff manuals, accessible to all who work at the site.

*'The crew and customer service staff are provided with reference information and it forms part of their training. The manuals are generally updated about twice yearly.'*

(On Board Product and Quality Manager, Transportation Catering, 11+ staff)

The information stored generally comprised supplier specifications or manufacturer information sheets.

*'We store detailed manufacturers information in the filing cabinet. We ask them to send this information so that we have a comprehensive breakdown in the event of a customer asking. The sign we display to customers will say 'Sausage contains rusk and seasoning' but if people actually want to know what the rusk is then it is in the filing cabinet.'*

(Owner, Farm shop, 1-4 staff)

When asked if they recorded information given by suppliers about the presence of allergenic ingredients in their food, the majority of businesses included in the follow up research said that they either did record this information or that they retained the labels from supplier's products. Businesses primarily recorded or kept supplier information so they were able to inform customers what was in the products if asked.

*'We retain the label from supplier on or with the product until the product has been completely sold. It's fairly easy to keep this information.'*

(Owner, Delicatessen, 5-10 staff)

Where businesses didn't record information from suppliers about allergenic ingredients, this was either because the supplier did not provide them with any information or because they did not think they sold or served foods containing allergenic ingredients.

*'I don't (record information). I think it's because I don't buy much that would have an allergen in it'*

(Manager, Sandwich shop, 1-4 staff)

Those food businesses that did not have formal structures in place with regards to recording, storing and updating of allergen information, stated that they retained all necessary information in their head. Storing information in more formalised systems was not deemed necessary given these businesses considered themselves very familiar with the ingredients and therefore the allergens contained within the foods they served.

*'Apart from the recipes we do not store allergen information. Recipes are the only place where ingredients are listed and a lot of these are in my head, other recipes I have to look up from time to time.'*

(Business Partner, Sandwich shop, 5-10 staff)

Amongst the food businesses included in the follow up research that did not store any allergy information, the general opinion was that it was the obligation of their suppliers to provide allergen information on their goods as standard. This was especially the case among those businesses that served meals and expected their supplier to label the constituent elements of a meal accordingly and identify any known allergen. As the food was sold / served then this information was passed on to the consumer accordingly and was not retained beyond the point of sale.

*'We do not store allergy information. The items that we buy in (e.g. sausages / muffins) already have the ingredients listed. As the ingredients change the manufacturer should update the content list on the packet.'*

(Assistant Manager, Hotel, 1-4 staff)

Others simply referenced the Internet as and when more information about allergens was required (usually upon customer request).

*'We have no formal records and use the Internet for information.'*

(Acting Head Chef, Hotel, 5-10 staff)

In addition to how allergen information is stored at the site, food businesses were also asked about the relative ease of updating allergen information as menus were modified as well as the associated financial and time costs. Food businesses did not feel that they changed their menus or the food they sold or served regularly enough to mean that updating allergy information was a significantly time consuming or financially costly exercise. Similarly, the scale of any change was, in the main, determined by the food business owners who could therefore limit the level of costs required.

*'We have a regular menu and a special menu and these change every one to two years. It is pretty straightforward to update menus because we are still using similar ingredients and so we know about those allergies.'*

(Director, Chinese / Indian restaurant / takeaway, 5-10 staff)

*'It is easy for us to update allergen information because we decide what goes on the menu.'*

(Owner, Sandwich shop, 5-10 staff)

The bulk of any costs would go towards the re-design and re-print of menus which were not considered substantial. Even within those sectors where meals or food were changed more often (i.e. the pre-schools and care homes sector), for example on a four to six

weekly basis, menu offerings were regarded as generally consistent and did not require a significant update on allergen information.

*'We have a four-week cycle of menus and it is relatively easy to update allergy information when menus change. The menus aren't changed drastically and it is not a case that when we do change them we are completely changing them every day.'*

(Nurse Manager, Pre-school, 11+ staff)

*'We keep pretty much to the foods the clients know, so the allergen information is really kept to a minimum.'*

(Chef Manager, Care home, 11+ staff)

### **3.4.2 Auditing ingredients**

Substantiation of allergenic ingredients is also an issue with which food businesses must grapple. Food hygiene legislation requires food businesses to undertake a hazard analysis, including allergy risks, and implement appropriate controls. Food businesses must therefore take care in relation to supplier information to be fully aware of product ingredients.

Overall, half of all food businesses surveyed 'always' checked or audited ingredients from their suppliers or wholesalers; 21% sometimes checked; and 27% never checked (see Chart 3.9).

Comparing broad sectors, caterers were the least likely to report that they 'never' check - 22% compared with 41% of retailers and 30% of institutions. 44% of chains always checked ingredients compared with 52% of non-chains. Smaller businesses with fewer than 5 staff were more likely to always check ingredients (57%) compared with 45% and 47% of businesses employing 5-10 and 11+ staff respectively.

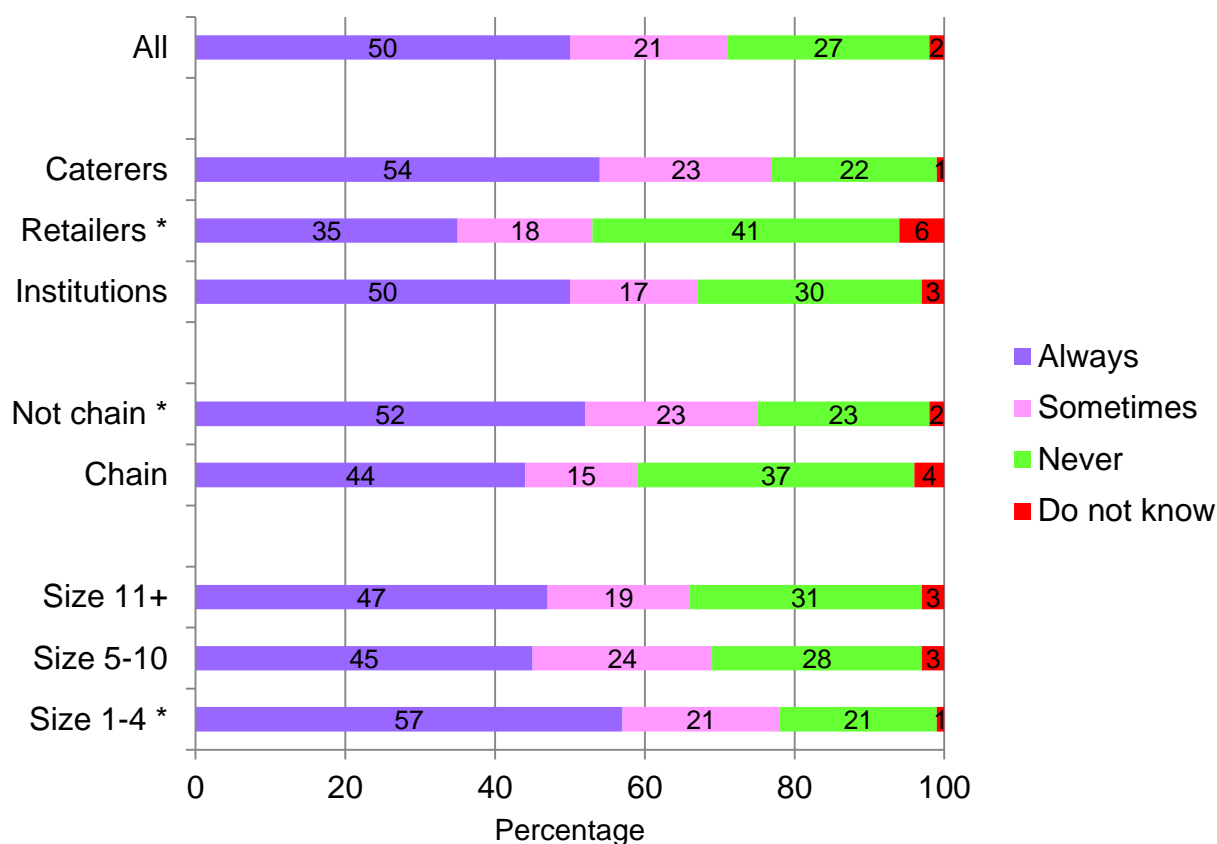
In relation to auditing or substantiating allergen ingredients from catering contractors, just 62 of the food businesses surveyed used contract caterers. Of these: 42% always checked the ingredients used by their catering contractors; 20% sometimes checked; 43% never checked and the remainder were not sure<sup>9</sup>.

No statistically significant differences were observed between all 4 countries of the UK

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<sup>9</sup> With such a small base sample, this data is not presented in a Table

**Chart 3.9: Proportion of food businesses who check or audit ingredients from suppliers / wholesalers: 'always' 'sometimes' or 'never'**



Q: A21. "Do you check or audit ingredients from suppliers / wholesalers?"

Base samples: all (1666) retailer (401); caterer (956); institution (309); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184)

Note: \* denotes a statistically significant difference to all other groups in the category

## Follow up findings – checking allergen information

Despite recording or retaining information from suppliers, it was not necessarily the case that food businesses regularly check this information. The food businesses interviewed in the follow up research have established relationships with suppliers that they largely trust, either through a long history of working together or being recommended by other food businesses or wholesalers, and therefore do not feel it necessary to check supplier information.

*'No – we deal with reputable suppliers – I take their word that what they send me in writing is actually in there.'*

(Owner, Butchers, 1-4 staff)

In addition, some of the businesses we spoke to noted that they did not have the means or resources to verify whether the information a supplier had given about the ingredients were correct.

*'We don't have the right equipment to check whether the information on ingredients is correct. I guess we have to go with what they say the ingredients are on the packets.'*

(Manager, Chinese / Indian restaurant / takeaway, 5-10 staff)

What's more the food businesses interviewed in the follow up research had rarely experienced mislabelling or adulteration of food in relation to allergen ingredients and so had little reason not to trust their supplier's products. In only one case had the business been delivered a product that was incorrectly labelled and, in this instance, it was quickly recognised and altered. Such visual checks were used by food businesses although it was recognised that improper allergen information provision could be missed by using this means.



## 4 May contain and free from information provision

Secondary aims of the study included: identification of the prevalence and type of information currently provided by food businesses about cross contamination of food allergens; and food allergen 'free-from' claims. These are addressed in turn in this chapter.

### Summary

#### ▪ May contain

- 29% of food businesses provided 'may contain' information for consumers
- May contain information was most commonly provided with reference to 'other' nuts and gluten (17% in each case) eggs and milk (14% in each case) and peanuts (13%)
- The remaining allergens of interest (celery, soybeans, crustaceans, molluscs, lupin and sulphur dioxide) were cited by 5% or fewer businesses.

#### ▪ Free from

- Free from labelling was comparatively rare with only 13% of surveyed businesses providing such guarantees
- Gluten was the most common ingredient referred to - found in 87% of food businesses which used free from information.
- Milk was referred to by 55% of businesses which used free from information; eggs by 51%; peanuts by 45%; and other nuts by 41% of businesses. 31% referred to fish and soybeans.
- Less widely cited were sesame seeds (29%), celery (26%), mustard (25%), crustaceans (24%), molluscs (19%), lupin (19%), and sulphur dioxide (14%).

## 4.1 May contain information provision

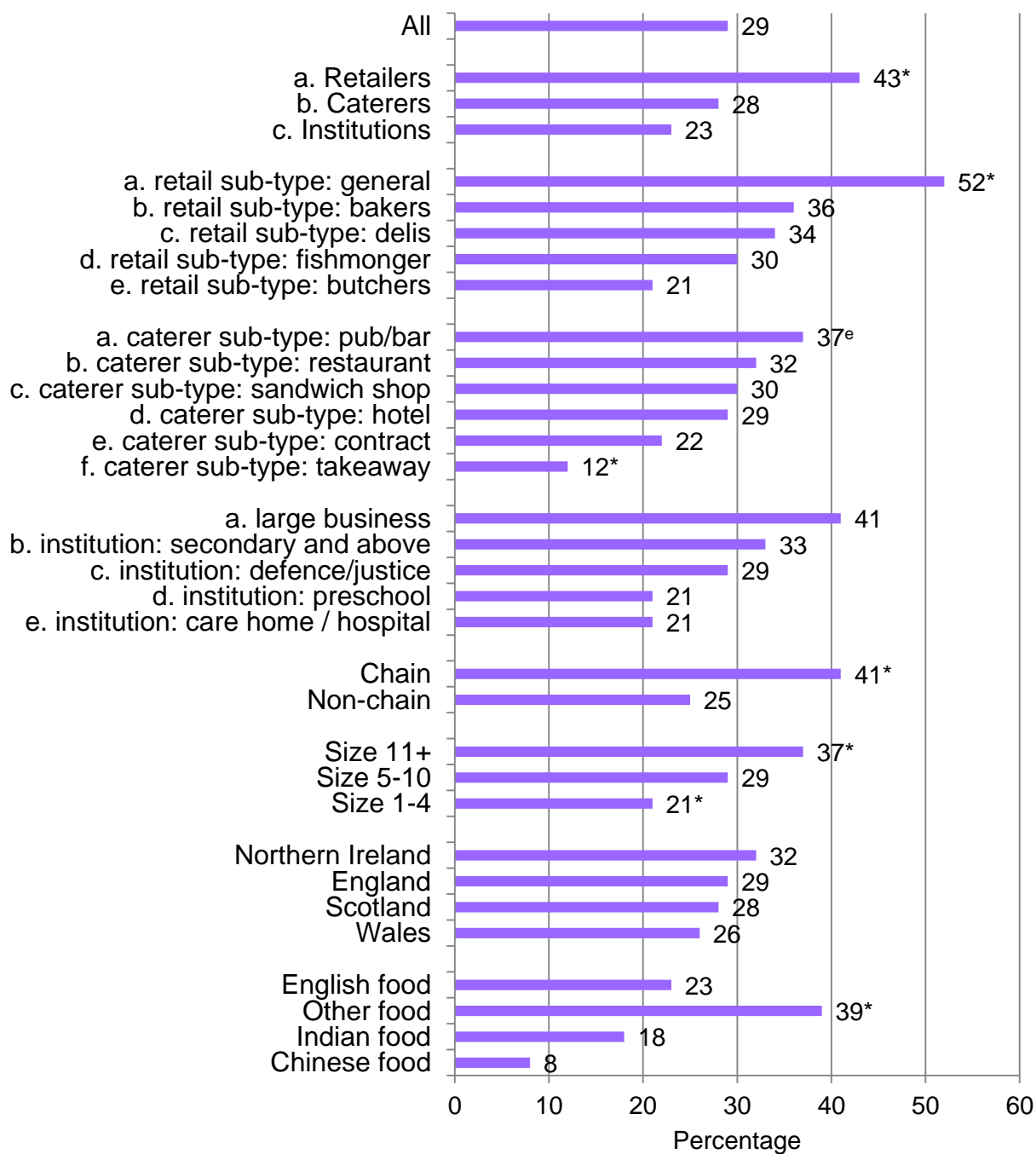
Clear food labelling or readily available information from retailers and catering staff is essential to help consumers with allergies to manage their condition and protect their health. While adequate and accurate labelling/information is necessary to protect allergic consumers, consumer organisations and commentators such as Hourihane (2001) also emphasise the importance of avoiding unnecessary restrictions through over-use of precautionary 'may contain' labelling.

Advisory labelling practices were addressed during the survey to ascertain their prevalence and the type of ingredients referred to when using may contain warning labels. Chart 4.1 shows the proportion of businesses which use 'may contain' labelling. Overall, 29% of businesses used 'may contain' information in relation to their meals or produce.

The practice is most common among retailers (43%) and least common among institutions (23%), while 28% of caterers used 'may contain' labels. Within the retail sector, the practice is most widely used among general retailers (52%) and least widely used among butchers (21%). Significant differences were also evident within the catering sector – 'may contain' labels were infrequently found in takeaway premises (12% reported providing such information), but were somewhat more widespread than the calculated average (29%) in pubs and bars (37%). 41% of chains used 'may contain' labels compared with just 25% of non chains. Significant differences were also evident according to the nationality of food sold – Indian and Chinese restaurants were less likely than average to use 'may contain' information (18% and 8% respectively compared with 23% of businesses selling 'English' food and 39% selling 'other' food).

No significant differences were observed in the provision of may contain information between all 4 of the UK countries.

**Chart 4.1: Proportion of food businesses which use 'may contain' labelling**



Q.A11. *Do you use 'may contain' labelling on any of your food products or meals?*

Base samples: All (1666) retailer (401); caterer (956); institution (309); butcher (52); baker (50); fishmonger (50); deli (49); general retail (200); restaurant (172); cafe/sandwich shop (199); takeaway (128); hotel (62); pub/bar (268); transport/contract caterer (127); care home/hospital (85) pre-school (80); other school (55); defence (49); large business (40); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152);

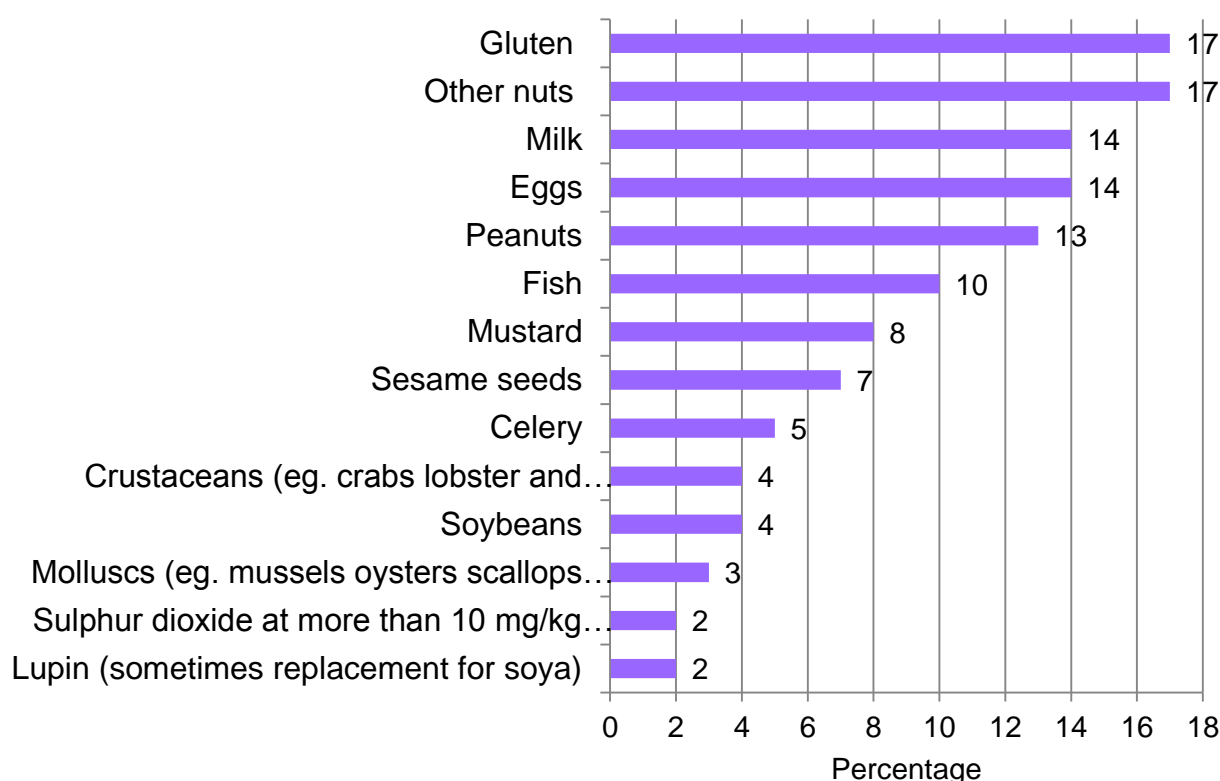
Wales (154); chain (479); non-chain (1184); English food (302); Other food (128); Chinese food (31); Indian food (23).

Note: \* denotes a statistically significant difference to all other groups in the category.

Statistically significant differences between just some groups within the category are denoted with lower case letters

The 29% of businesses which provided 'may contain' information were asked which allergens they referred to (multiple responses were permitted). Findings are presented in Chart 4.2. The ingredients most widely referred to were other nuts and gluten (17% in each case) followed by eggs and milk (14% in each case) and peanuts (13%). Less widely cited in 'may contain' labels were: fish (10%); mustard (8%); and sesame seeds (7%). The remaining allergens of interest (celery, soybeans, crustaceans, molluscs, lupin and sulphur dioxide) were cited by 5% or fewer businesses.

**Chart 4.2: Proportion of food businesses providing ‘may contain’ information with reference to each of the allergens**



Base: 472 businesses which provide ‘may contain’ information

Note: Q:A13. *Which of the following allergens do you refer to in your ‘may contain’ labelling?*

Multiple response option

### ***Follow up findings – ‘May contain’ information***

As part of the follow-up research food businesses that used ‘may contain’ information in relation to their products were asked in more depth about their use of it, including methods adopted, whether they use it on all their food products and whether they face any difficulties or challenges in providing this information. Similar to providing customers with information about allergens generally, a number of food businesses spoken to in the follow up research regarded the use of ‘may contain’ labelling as a means by which to protect

their commercial reputation. These businesses conceded that they used 'may contain' information as standard on most or all of their products as they did not feel confident enough to guarantee against the presence of trace allergens in the food they served or sold. This was particularly the case among those businesses that did not produce all foods on site, and bought in ingredients from manufacturers or suppliers.

*'We use 'may contain' labelling as insurance, to avoid being taken to court. The labelling is on most, if not all of the products we serve.'*

(On Board Product and Quality Manager, Transportation catering, 11+ staff)

*'I use may contain labelling to cover myself for insurance purposes. We also have a small sign which is about A4 size, above where the sweets are displayed saying we cannot guarantee against traces of nut or gluten etc.'*

(Owner, Sweet shop, 1-4 staff)

*'These ingredients are produced in a factory where there are allergens. So what we're doing is covering ourselves against that. I mean we can't say it definitely does contain an allergen, just as we can't say it definitely doesn't.'*

(Owner, Sandwich shop, 5-10 staff)

Operating a blanket use of 'may contain' information generally means it is very easy for businesses to provide this information to customers. It is viewed as particularly easy for those who bought in food products from manufacturers and suppliers as 'may contain' labelling was often already on the packaging and even if the product was served loose they had the packaging to refer back to.

Other businesses adopted a more variable approach in the use of 'may contain' information, choosing to provide the advice in some cases but not all. Where businesses sell a mixture of meals prepared on-site and loose items on specialist counters, different levels of labelling were used. Whereas 'may contain' was more likely to be used on menus to indicate that some meals may have been prepared in an environment that handles nuts or gluten, it was less likely to be used on specialised loose food counters, where food types and potential allergens are considered more obvious and so businesses relied on customer common sense in this environment.

*'We have a number of customers who know what cheese they can and cannot buy because their child has an allergy to cows' milk. So they know to buy goat's cheese or cheese made from ewes' milk from our cheese counter.'*

(Owner, Sandwich shop, 5-10 staff)

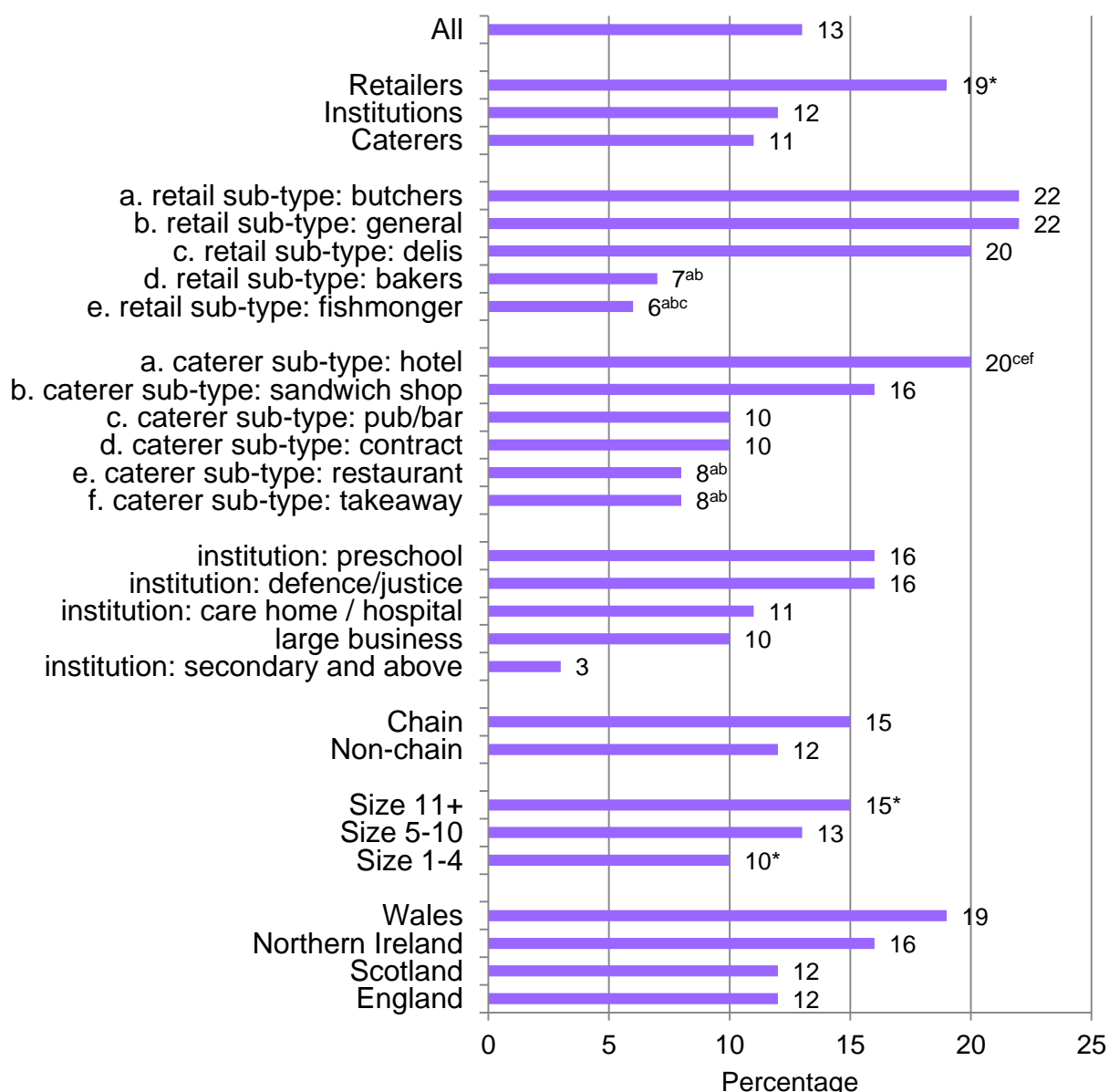
## **4.2 Free from information provision**

Allergic customers can benefit from labelling which stipulates that a product is free from specific allergens. A previous FSA study indicated that among consumers allergic to nuts, the improvement they would most like to see was an increase in the use of 'nut free' labelling (FSA, 2009). However, the challenges associated with 'free from' information provision were raised during the scoping stage of the current study which highlighted the importance of stringent auditing processes as a pre-requisite for such 'guarantees'. Auditing would need to be done on a regular basis as the supply of ingredients can suddenly change. One interviewee from the scoping stage indicated that chefs therefore need to have sufficient information and training and auditing systems in place to know each ingredient, its source and also manage cross-contamination hazards to be able to provide this type of guarantee. Given these challenges, the incidence of 'free from' labelling is not widespread and overall only 13% of surveyed businesses used such labels – ranging from 11-12% among caterers and institutions respectively to 19% among retailers (Chart 4.3).

Statistically significant differences in the incidence of 'free from' information provision were evident within: the retail sector; the catering sector; and among businesses of different sizes. Within the retail sector, free from information was found most often within butchers (22%) general retailers (22%) and in delicatessens (20%). By contrast, free from information was quite rare in bakers (7%) and fishmongers (6%). Within the catering sector, free from information was most common in hotels (20%) and sandwich shops (16%) and least common in restaurants and takeaways (8% in each case). In terms of food business size, the larger the business the more likely it was to use free from guarantees, rising from 10% of businesses with 1-4 members of staff to 15% of businesses with 11+ staff.

Cross country differences and differences between chains and non chains were not statistically significant.

**Chart 4.3: Proportion of food business types which use 'free from' labelling**



Q: A14. Do you use 'free from' labelling on any of your food products or meals?

Base: All (1666); retailer (401); caterer (956); institution (309); butcher (52); baker (50); fishmonger (50); deli (49); general retail (200); restaurant (172); cafe/sandwich shop (199); takeaway (128); hotel (62); pub/bar (268); transport/contract caterer (127); care home/hospital (85) pre-school (80); other school (55); defence (49); large business (40); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184); English food (302); Other food (128); Chinese food (31); Indian food (23).

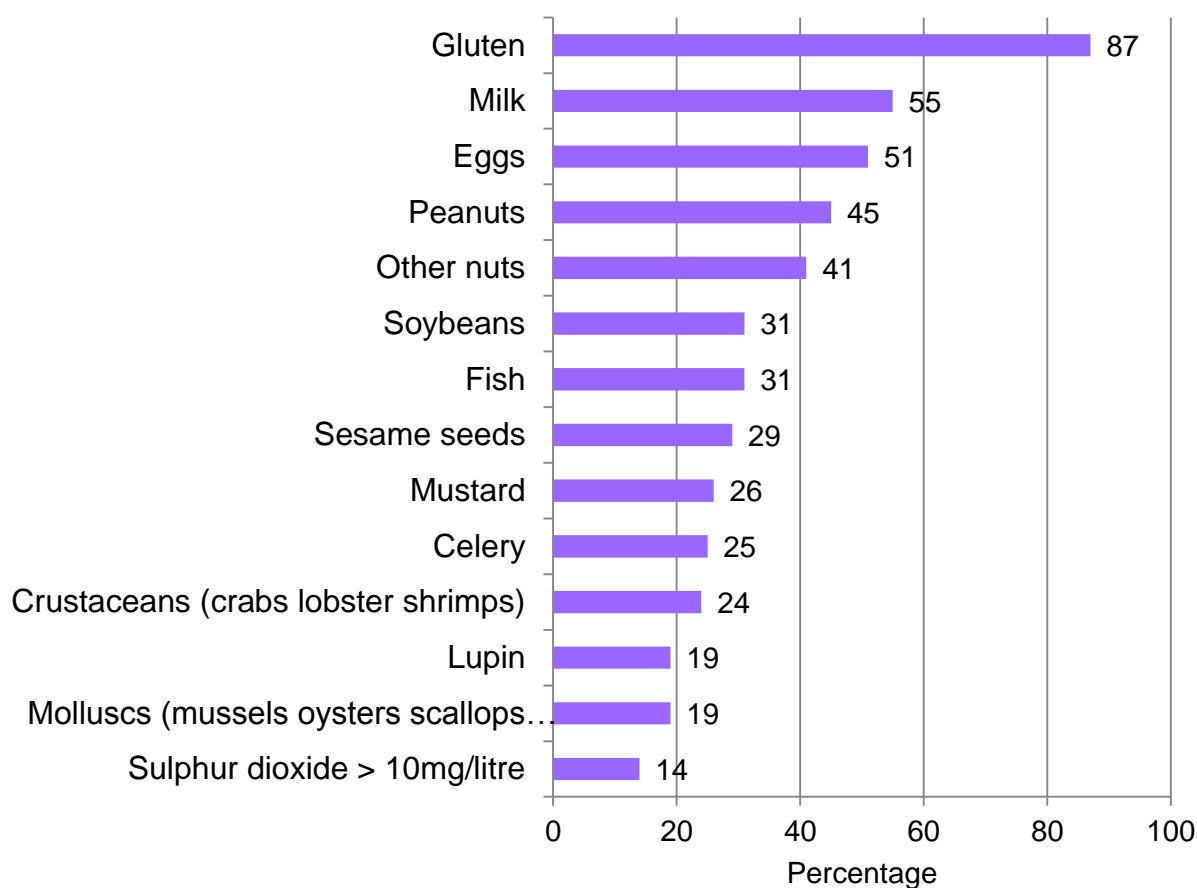
Note: \* denotes a statistically significant difference to all other groups in the category.



Statistically significant differences between just some groups within the category are denoted with lower case letters.

Chart 4.4 shows, among businesses which made 'free from' claims, which allergens were most often referred to in their 'free from' labels. Gluten was the most common ingredient, referred to in 87% of food businesses which used free from labelling. Milk was referred to by 55% of businesses; eggs by 51%; peanuts by 45%; and other nuts by 41% of businesses. Around one third of businesses (31%) referred to fish and soybeans. Less widely cited were sesame seeds (29%), celery (26%), mustard (25%), crustaceans (24%), molluscs (19%), lupin (19%), and sulphur dioxide (14%)

**Chart 4.4: Allergens included in 'free from' labelling**



Base: 217 food businesses which use free from labels

Q:A16 "Which of the following allergen ingredients do you refer to in your 'free from' labelling? Multiple response option

## Follow up findings – ‘Free from’ labelling

As part of the follow-up research, food businesses that used free-from labelling were asked about their use of it. Free-from labelling was used to accommodate customer’s needs as far as possible although those interviewed reported using it on just a selection of products against which ‘free from’ claims could be substantiated with complete confidence. This included instances where food was made on-site and where food was bought in from suppliers/ manufacturers already labelled with ‘free-from’.

Food businesses were also asked about the methods used to relay ‘free-from’ labelling. Methods included leaving the ‘free-from’ labelling on packaging where food items were bought in, as well as updating blackboards and menus when food choices changed.

*‘We have cake boards with free from information on, and some of the ready meals have free from on the blackboard next to them’.* (Business Partner, Delicatessens, 5-10 staff)

In the one instance where gluten free labelling was used the claim was not substantiated specifically against the limits set in 2009 – the specifications of which were not known by the business.

## **5 Business processes and staff training**

Consumers with allergies can find it difficult to avoid allergenic foods and threats to health can arise purchasing food from markets, stalls or other catering establishments due to incorrect information or an absence of information in relation to allergenic ingredients. The challenges associated with purchasing food and eating out can be greatly alleviated, however, when businesses recognise their duty to protect public health against hazards in food by implementing adequate processes and staff training with attention to the provision of information for consumers. These issues form the focus for this chapter.

Section 5.1 begins by examining whether owners/managers were: aware of food allergy issues; have read documentation or received advice relating to the management of food allergens; and have received training in relation to food allergy issues and related business practices. Section 5.2 then examines the type of food allergy related information and training managers and owners provided for their staff. Section 5.3 investigates the incidence of 'formal systems' designed to avoid cross contamination and which particular practices were most common. Within each of the sections, the extent to which practices differed in different business contexts are explored.

## Summary

### ▪ Awareness of allergen issues

- 50% of business owners/managers have read materials relating to food allergens.
- The most common sources of allergen information were Local Authorities and the Food Standards Agency.
- One third of business owners/ managers have received some form of training in relation to allergens – this was more common in larger compared with smaller food businesses.
- 60% of business owners/managers had either read documentation or had attended a training session on food allergens.

### ▪ Staff training

- 78% of food businesses provided food allergen training for their new staff .
- Food businesses provide their staff with food allergy information by means of a range of written materials, including the FSA voluntary best practice guidance, booklets on allergy control, information leaflets, easy access posters on their walls, and in staff handbooks.

### ▪ Cross contamination

- 76% of food businesses operated a formal system to prevent cross contamination.
- Separation of chopping boards and utensils when preparing food was the most prevalent approach (48%), followed by use of separate work areas (46%) colour coding (24%); separate cooking equipment (22%); or routine cleaning between preparation tasks. Separate food storage was used by 14% of businesses and 12% have implemented a formal hand-washing policy.
- Follow up interviews which explored reasons for not having formal systems in place highlighted, in some instances, a lack of space. For some, the cost of additional equipment and utensils was also a barrier. The issue of consumer contamination was perceived as an

## **5.1 Food allergen issues: awareness and training**

Chart 5.1a shows the proportion of business owners/managers who have read food allergy related documentation or guidance and Chart 5b shows the proportion of business owners/managers who have received formal training in relation to allergies.

Looking first at food allergen documentation or guidance, exactly half the business owners/managers have read materials relating to allergies. No statistically significant differences in this incidence are evident when comparing different business types and different countries.

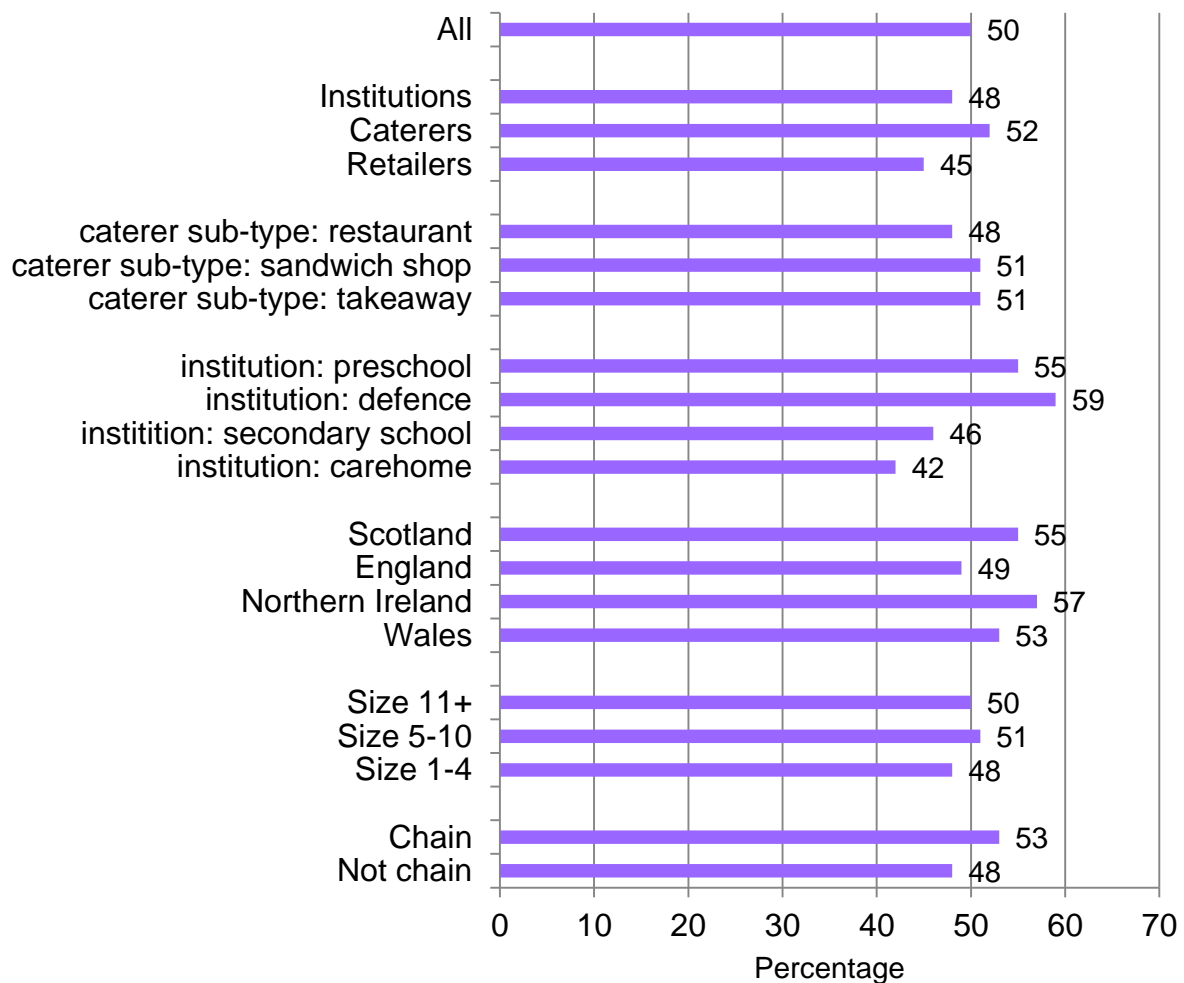
With reference to formal training, one third (34%) of business owners/managers have received some form of training. Training was less likely to be reported among retailers (26%) compared with caterers (37%) and institutions (33%).

Training was also more common in larger compared with smaller food businesses, ranging from 29% in businesses with fewer than 5 staff to 41% in businesses with 11+ staff.

42% of owner/managers in chain establishments had received formal allergen training compared with 31% in non-chains.

Overall, 60% of business owners/managers had either read documentation or had attended a training session.

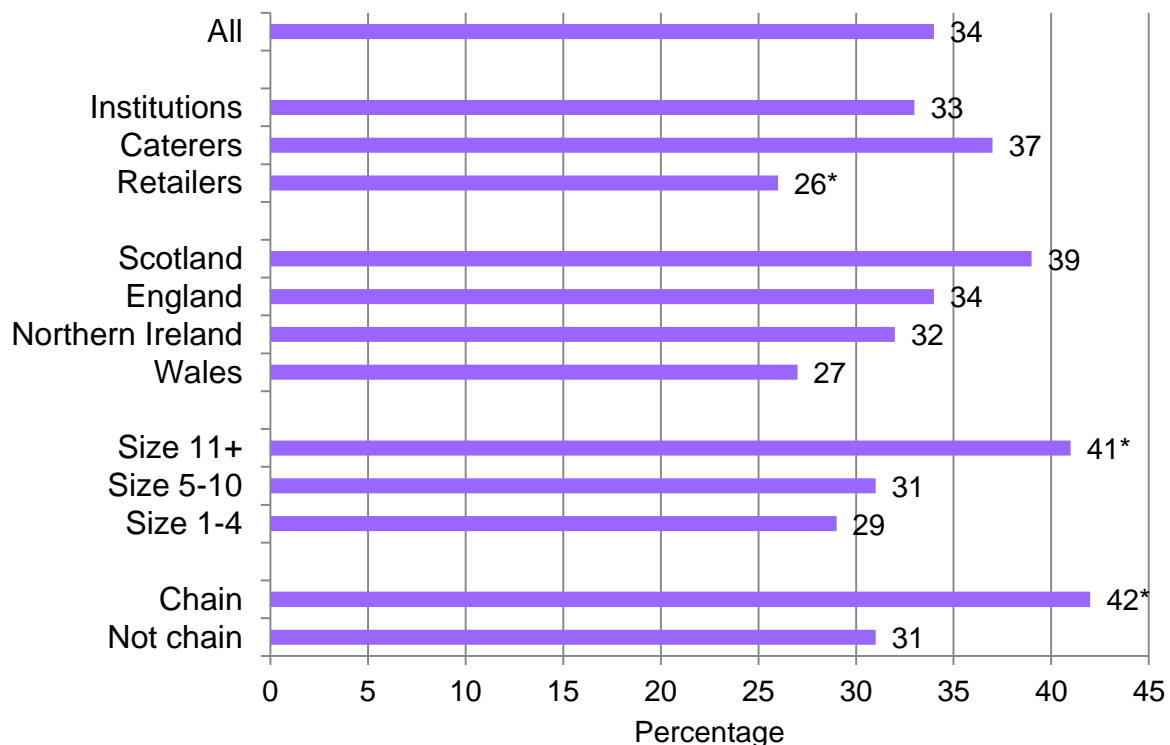
**Chart 5.1a: Proportion of food businesses which have read any food allergen documentation/advice**



Base: All (1666) retailer (401); caterer (956); institution (309); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184)

Q:D1 *Have you ever read any documentation or guidance on food allergen labelling?*

**Chart 5.1b: Proportion of food businesses which have received formal food allergen training**



Base: All (1666) retailer (401); caterer (956); institution (309); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184)

Q:D3. *Have you received any formal training on food allergens?*

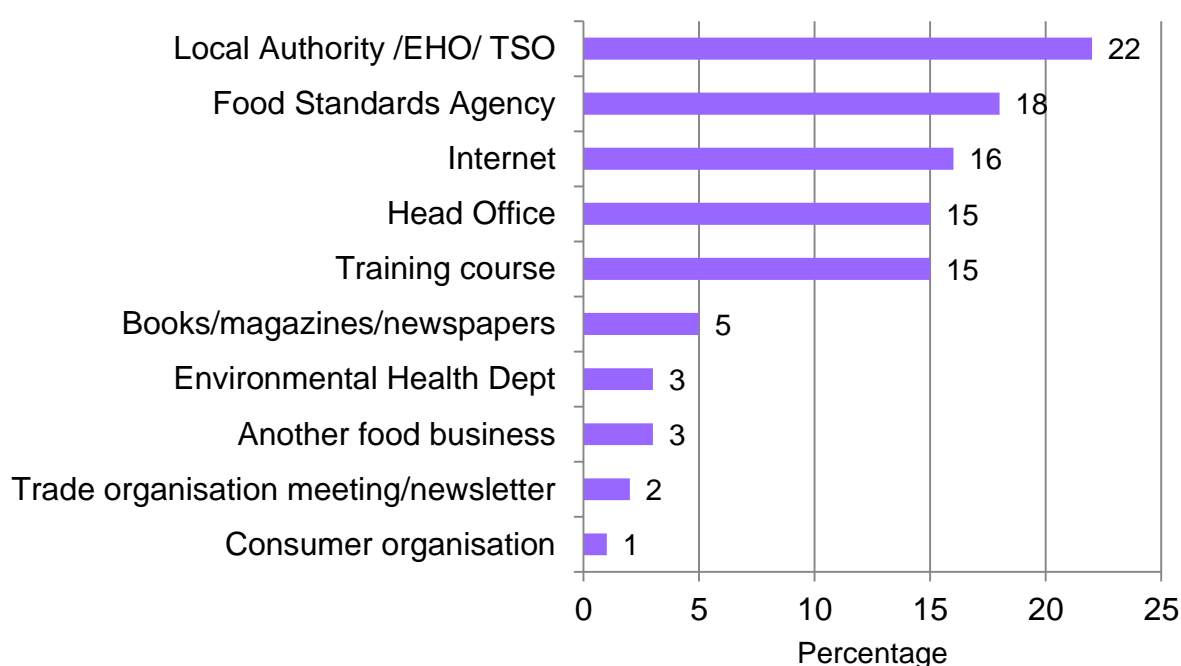
Note: \* denotes a statistically significant difference to all other groups in the category.

Business owners/managers who had read food allergen related documentation or guidance were asked the source of this information. Findings are presented in Chart 5.2. The most common source of food allergen information was the local authority (received by 22% of businesses), followed by the Food Standards Agency – 18%. Other fairly widespread sources of information include the internet (16% – website unknown), head offices (15%) and training courses (15%). Far less common, cited by 5% or fewer businesses, are books/magazines, the Environmental Health Department, other food businesses, trade or consumer organisations.

In relation to sources of food allergen information, no significant differences among different types of business were evident with the exception of chains which were notably more likely to have received allergen information from their head office (40%) compared with non-chains (4%).

Responses did not differ significantly between countries with one exception – food businesses in Northern Ireland were significantly more likely to access information from their Local Authority (35%) compared with food businesses in Wales (23%), Scotland (21%) and England (18%).

**Chart 5.2: Source of food allergen information**



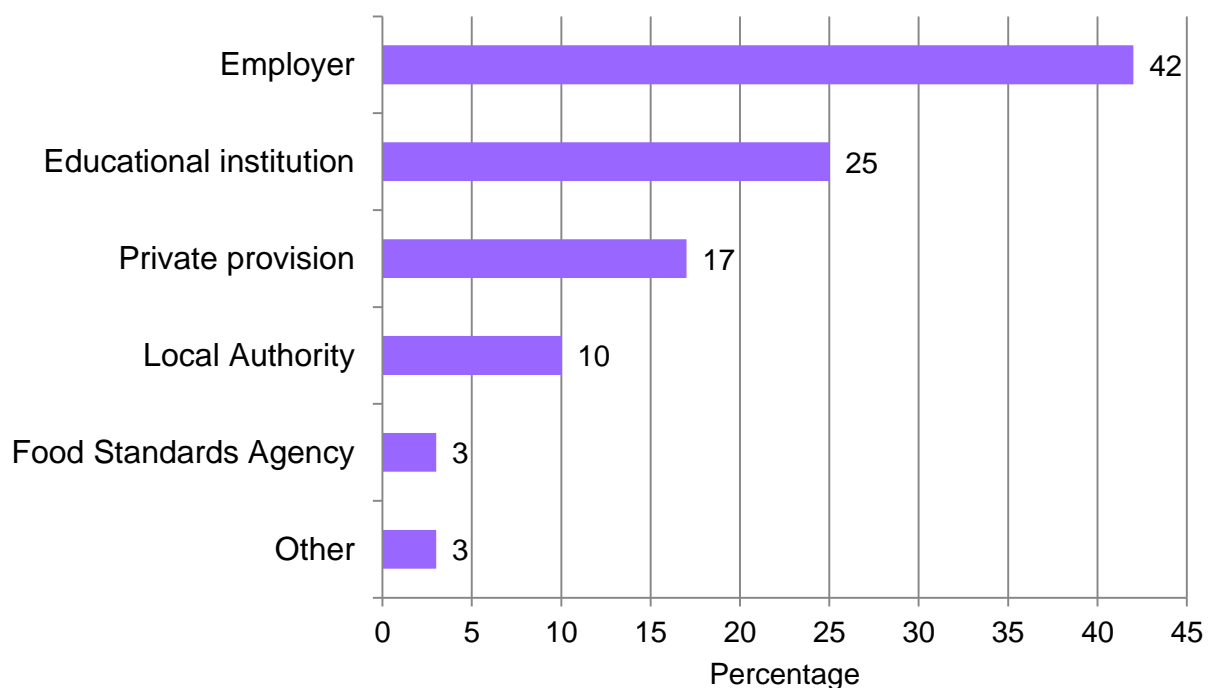
Base: 857 food businesses which had read documentation or guidance on allergen labelling

Q:D2. *Where did the information come from?* Multiple response option

Chart 5.3 shows the source of training received. The most commonly reported source of training was from an employer – cited by 42% of food businesses. 25% of those who had received training did so through a college or other educational institution; 17% received private training while a Local Authority provided training for 10%. 3% of owners/managers received training from the FSA and 3% from an ‘other’ source.



**Chart 5.3: Source of food allergen training**



Base: 575 food businesses which had received formal training

Q:D4. *Who provided the training?* Multiple response option

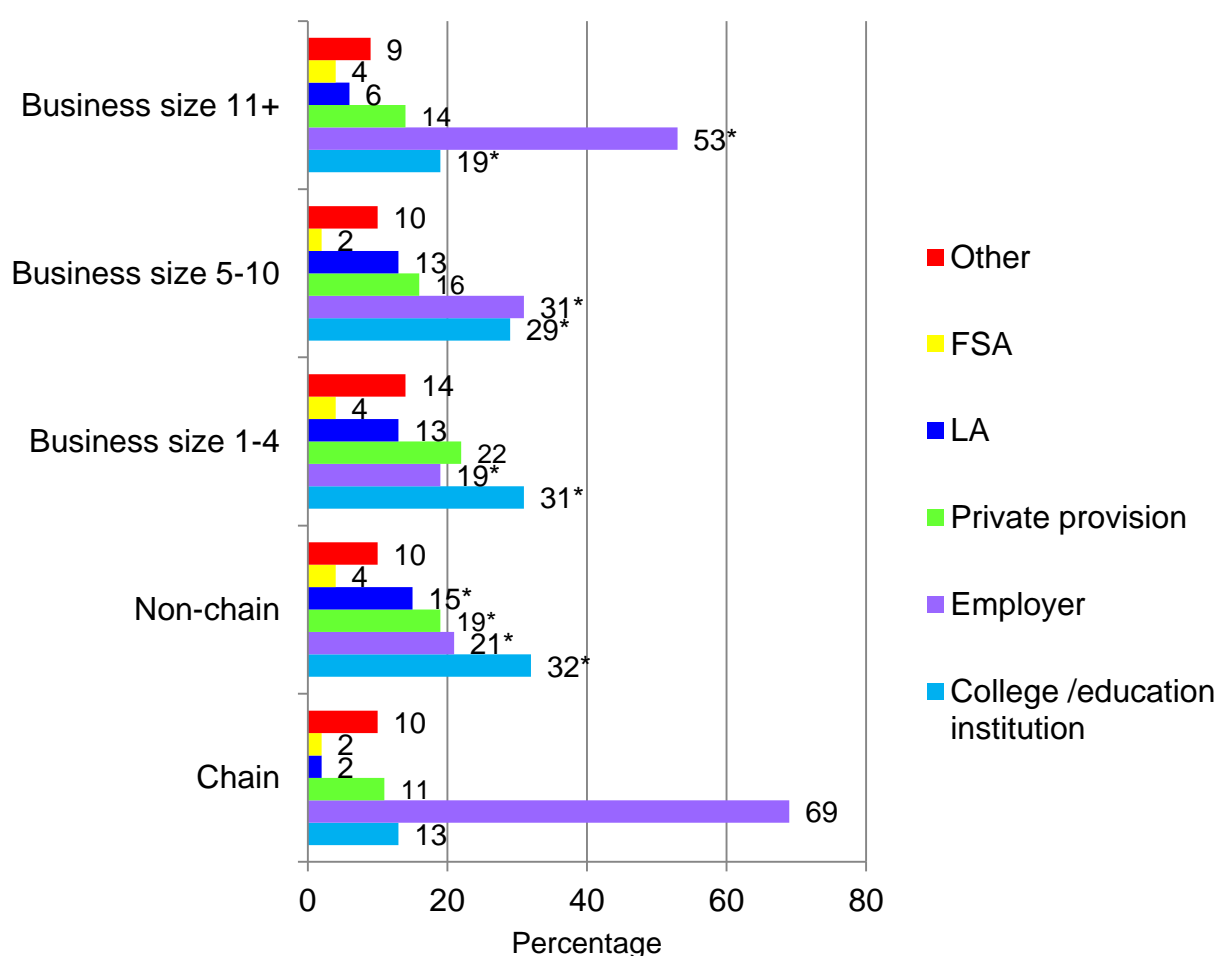
No statistically significant differences in sources of training were evident apart from in relation to chains/non chains and food business size – shown in Chart 5.4. Looking first at the differences between chains and non-chains, chain food businesses were far more likely to have received training from their employer (69% compared with 21% of non chains). Non chains, by contrast, were more likely to have received training from an educational establishment (32% compared with 13% of chains); from a private provider (19% compared with 11% of chains); or from their Local Authority (15% compared with 2% of chains).

In relation to business size, large businesses with 11+ staff were:

- least likely to have received training from an educational establishment (19% compared with 29% of businesses with 5-10 staff and 31% of businesses with 1-4 staff);

- most likely to have received training from their employer (53% compared with 31% of businesses with 5-10 staff and 19% of businesses with 1-4 staff);
- were least likely to have received training from a private provider (14% compared with 16% of businesses with 5-10 staff and 22% of businesses with 1-4 staff);
- were least likely to have received training from an LA (6% compared with 13% of businesses with 5-10 or 1-4 staff).

**Chart 5.4: Source of food allergen training by business size and whether a chain**



Base: 575 food businesses which had received formal training

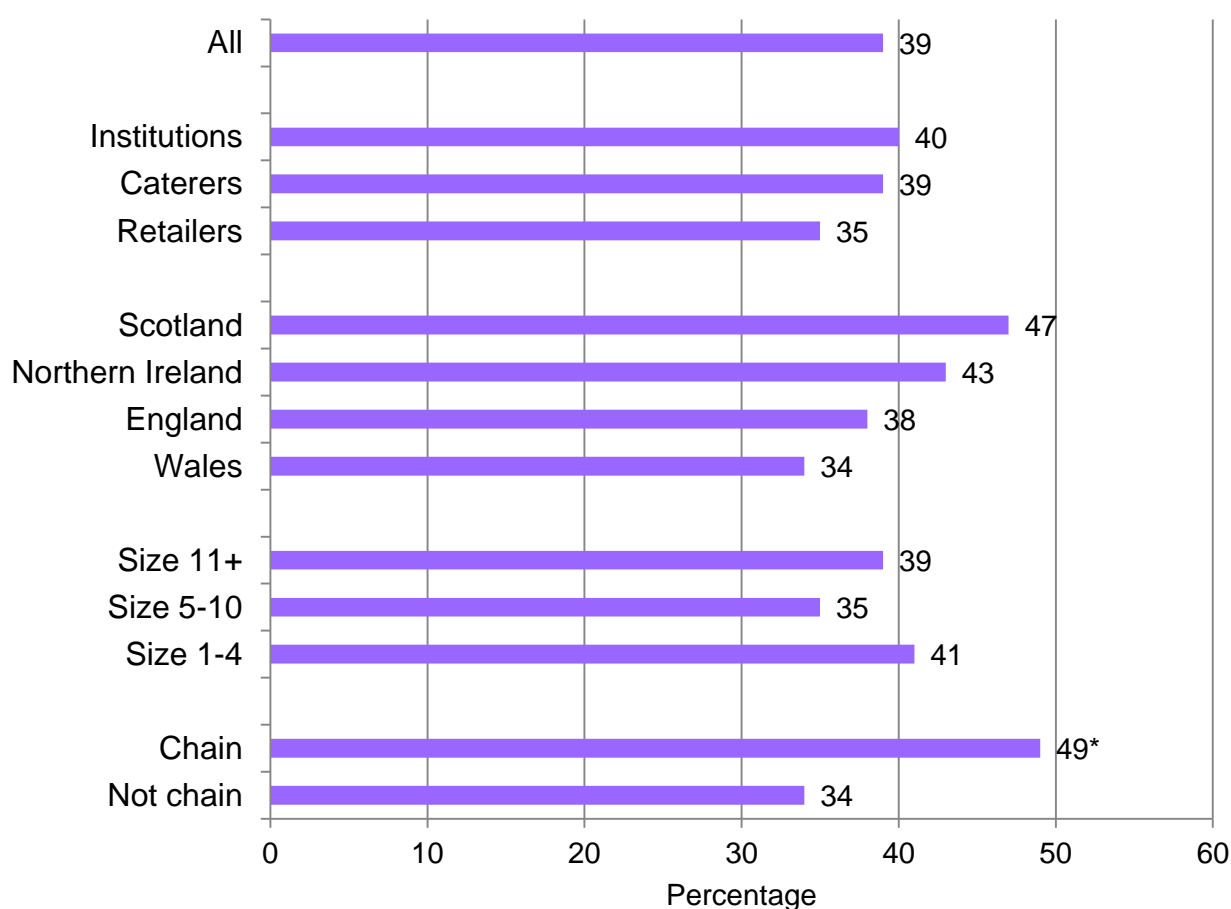
Q:D4. *Who provided the training?* Multiple response option

Note: \* denotes a statistically significant difference to all other groups in the category.

In 2008 the Food Standards Agency (FSA) produced voluntary best practice guidance on the provision of allergen information for foods not prepacked aimed at caterers and retailers. This guidance provided advice on controlling food allergens in food businesses where the food has not been prepacked, for example in: takeaways, restaurants, bakeries, deli counters, sandwich bars and schools etc. The guidance also provided advice on how to communicate food allergy issues to the consumer. The guidance, summary leaflet and associated poster were evaluated in 2010 in order to assess: awareness among food businesses; uptake of the full guidance; and to gauge the impact of the guidance on businesses in terms of changes to their practices (Jigsaw Research, 2010). The 2010 study found that one quarter of businesses were aware of the guidance. Chart 5.5 shows that a little more than two years later, in late 2012, overall awareness had increased to 39%.

The incidence of awareness is similar across businesses regardless of sector or size, although chains are significantly more aware (49%) compared with non chains (34%). Awareness in Scotland (47%) is higher than England (38%) and Wales (34%) but this difference is not statistically significant.

**Chart 5.5: Percentage of food businesses aware of the FSA best practice guidance**



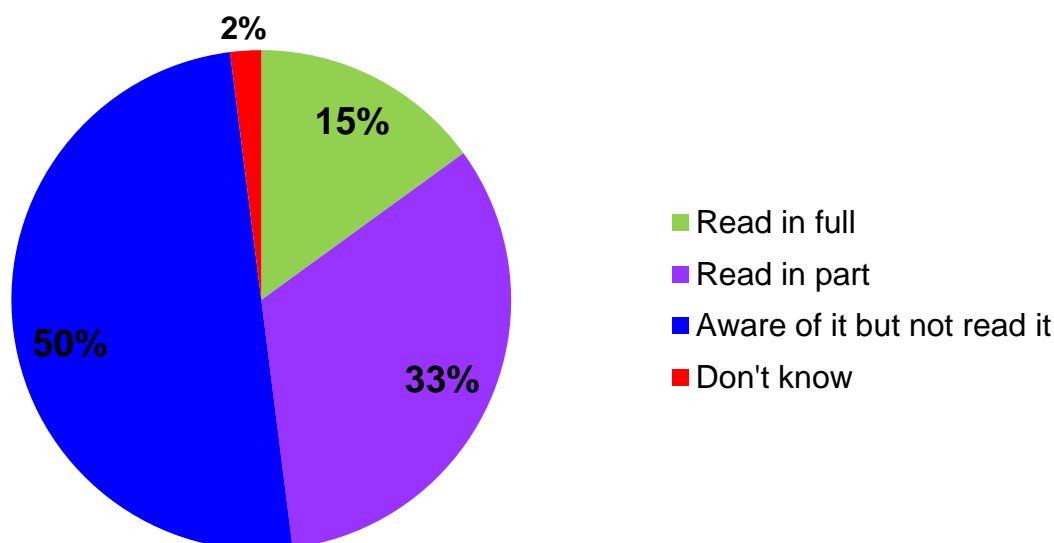
Base: All (1666) retailer (401); caterer (956); institution (309); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184)

Q:D5. *Are you aware of the Food Standards Agency's (FSA) voluntary best practice guidance in relation to allergen labelling?*

Note: \* denotes a statistically significant difference to all other groups in the category.

While 39% of food business owners/managers are aware of the FSA guidance, not all have read it. Chart 5.6 indicates, among businesses which were aware of the documentation, the proportion which had read it either in full or in part. The largest group (51%) were merely aware of the guidance, one third (33%) have read parts of the guidance and just 15% have read it in full.

**Chart 5.6: Percentage of food businesses which have read the FSA best practice guidance**

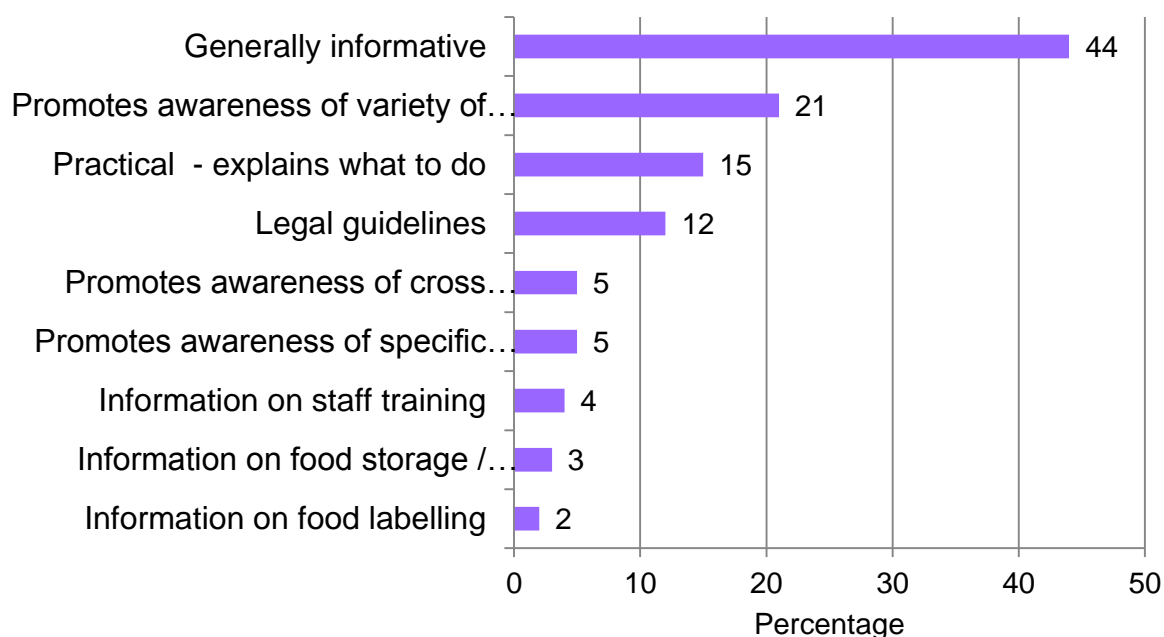


Base: 626 food businesses aware of the best practice guidance

Q:D6. *Have you read the Food Standards Agency's voluntary code of good practice in full or in part or are you just aware that it exists?*

Among those who have read the FSA guidance in full or in part (307 businesses), 95% of food businesses found the guidance 'easy to understand'. Of the 5% of food businesses that did not find it easy to understand, reasons given included: it as 'too technical'; it did not apply to their business; it was difficult to see how to apply the guidance; the guidance was unclear/ambiguous. Chart 5.7 lists the ways in which readers found it helpful. The largest group (44%) described it as generally informative. Other features picked out included: promoting awareness of the variety of allergens (21%); providing practical advice and guidance on (15%) and providing information on legal guidelines (12%). Much smaller proportions highlighted other benefits of the guidance such as information on food labelling, staff training, food storage and cross contamination issues.

**Chart 5.7: Food business perceptions of which aspects of the FSA best practice guidance were helpful**



Base: 295 businesses which had read the guidance and found it helpful

Note: Q:D7b *In what way was the guidance helpful?* Multiple response option

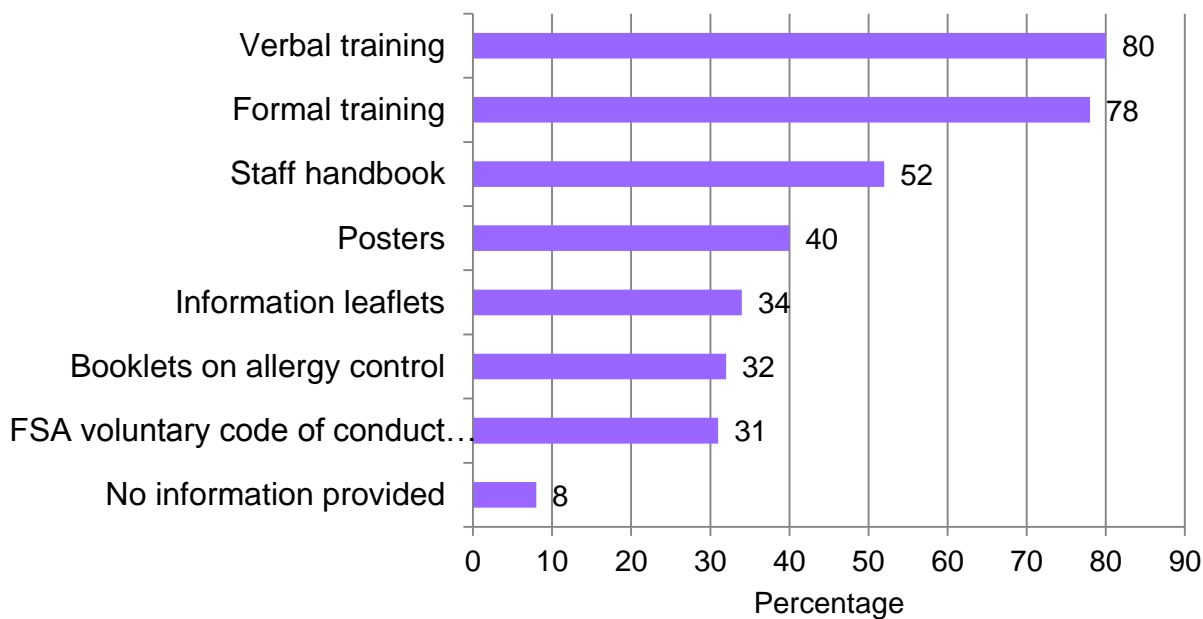
## 5.2 Food allergen information provided for staff

While section 5.1 examined food allergen awareness and training among business owners and managers, this section addresses whether and how allergen related knowledge and information is cascaded down to their staff. The section examines the type of information provided for staff and whether they have received training. High quality staff training and good communication was highlighted in the FSA review on regulation cultures and behaviours as critical in the promotion of regulatory compliance (IES, 2010).

Chart 5.8 shows the type and range of information provided for staff in relation to food allergens. A list of methods which could be used to inform staff about food allergens was read out during the survey (see list in Chart 4.7), respondents were asked to indicate whether they used each of the methods. The findings indicate that the vast majority of food businesses did provide training for their staff in relation to allergens - 80% provided oral training and 78% 'formal' training for new staff. A range of written materials were also

provided by many businesses and some used more than one source of written information. 31% provided their staff with a copy of the FSA voluntary best practice guidance, 32% used booklets on allergy control, 34% used information leaflets, and 40% used easy access posters on their walls to keep staff informed about food allergy issues. Finally, 52% included food allergy information in their staff handbook.

**Chart 5.8: Type of information provided for staff relating to food allergens**



Base: 1666

Q: B1b. Are staff provided with allergen information, including the risks of cross contamination of allergens, in any of the following ways? Multiple response option.

Table 5.1 explores whether food allergen training practices and approaches differ in different business types, sizes and across the four countries of the UK. Compared with caterers and retailers, institutions were significantly more likely to use the full range of information materials, including posters, leaflets, booklets, the FSA guide and staff handbooks. Institutions were also most likely to provide formal training.

Compared with smaller businesses with fewer than five staff, larger businesses were significantly more likely to provide each of the types of information listed and more likely to provide oral or formal training.

Country differences were not statistically significant with two exceptions – food businesses in Scotland and Northern Ireland were more likely to inform their staff about food allergens by means of staff handbooks (66% and 64% respectively) compared with businesses in England and Wales (50-51%). Formal training was also more widespread in Scotland and Northern Ireland (84% and 87% respectively) compared with England and Wales (77% and 76% respectively).

**Table 5.1: Type of information relating to food allergens provided for staff by business type, size and location**

	Caterers	Retailers	Institutions	1-4	5-10	11+
Cell percentages						
Posters	38	28*	50*	41	41	47*
Information leaflets	31	23*	50*	26	31	44*
Booklets on allergy control	31	19*	41*	25*	32	37
FSA best practice guidance	32	24*	34	29	35	31
Oral training	81	66*	85	69*	85	86
Staff handbook	51	44*	61*	39*	54	63*
Formal training	76	68*	88*	61*	84	89
No information provided	8	17*	4*	16*	5	4
N	956	401	309	586	452	613

	a. England	b. Scotland	c. N. Ireland	d. Wales
Cell percentages				
	39	46	45	36



## Posters

Information leaflets	33	41	42	33
Booklets on allergy control	31	40	33	33
FSA best practice guidance	31	37	32	33
Oral training	80	80	82	78
Staff handbook	51	66 <sup>ad</sup>	64 <sup>ad</sup>	50
Formal training	77	84	87 <sup>ad</sup>	76
No information provided	9	7	4	10
N	1162	198	152	154

Q:B1b. *Are staff provided with allergen information, including the risks of cross contamination of allergens, in any of the following ways?* Multiple response option.

Note: \* denotes a statistically significant difference to all other groups in the category.

Statistically significant differences between just some groups within the category are denoted with lower case letters

## Follow-up findings - Business processes and staff training

Oral allergen information provided to staff was included in staff inductions or given in team briefings and, in the main, among businesses we spoke to in the follow up research, consisted of communicating the ingredients used in the businesses' food dishes and products.

*'Staff are given allergen information on induction when they start work and then verbally from myself when the menu changes. No materials are provided.'*

(Owner, Delicatessen, 5-10 staff)

Where written materials were provided among businesses we spoke to in the follow up research, they included online and hard copy reference manuals of all ingredients used in food products sold that staff could refer to, and a communication book to record information that may be needed for staff on the next shift. In addition, a small number of the businesses we spoke to cited that they ensured all staff read through the general food safety policy when they started work, although there were no guarantees that this specifically contained relevant information on allergens.

Allergen information and guidance for staff was updated as and when needed, rather than at regular intervals, and among the business we spoke to in the follow up research this was usually when the menu or products sold changed. In all cases of the businesses we spoke to the owner or general manager assumed responsibility for providing these updates.

*'The information staff are given is which dishes contain the main allergens, for example wheat, nuts or eggs. We don't provide staff with any materials; we tell them verbally...it's just what we've always done. They would be updated whenever there is a change of menu and I would be responsible for this.'*

(General Manager, Chinese / Indian restaurant / takeaway, 5-10 staff)

As discussed earlier, a more structured approach was adopted by the pre-schools and care homes we spoke to as part of the follow up research, where plans in place for individuals trusted in their care were used to record information on relevant allergens. In

turn, if there were any changes in information needed, this would be updated in the plan, which is referred to by staff on a regular basis.

The businesses spoken to as part of the follow up research saw the provision of oral or written information relating to allergens, as discussed above, as forming the basis of their staff training on allergens and no further training was provided in this area.

A number of businesses were included in the follow up research on the basis that they provided staff with no allergen information at all. Key reasons for this included the fact that there was no legal obligation to provide this information and the amount of time and resource that would be required, especially amongst those businesses with a high turnover of part time staff.

*'I am not required to provide information to staff as far as I know. It is better to provide no information than misinformation.'*

(Owner, Fishmonger, 1-4 staff)

*'I suppose the challenge is high staff turnover and we're a small business so we don't have that time scale to provide all that information to the part time workers. We haven't trained staff on allergens before.'*

(Manager, Chinese / Indian restaurant / takeaway, 5-10 staff)

Furthermore, owners and managers who did not provide allergen information to staff cited their own knowledge of their food products, in conjunction with their continued presence at the business as a fundamental reason for not needing to fully inform staff in this area. In fact, this was evident across food businesses that both did and did not provide allergen information to staff, with a general reliance on the fact that the owner or manager would always be present to answer any questions on allergens, therefore often eliminating the need for staff to be provided with comprehensive allergen information.

*'We don't provide information to staff because it is only me or my assistant manager who cook and one of us would always be there. It is an 'open kitchen' next to the bar so any customer can easily ask us any questions they might want to. Whoever has made the soup would answer the questions.'*

(Manager, Pub, 5-10 staff)

*'I'm always hovering in the background, or my husband is, so if they (staff) do trip up and give out wrong information then we're there to correct them'*

(Owner, Sandwich shop, 5-10 staff)

Food businesses included in the follow up research could see no major challenges to providing staff with regular updates on the food sold and allergens. The small size of the business, bearing in mind that we spoke to predominantly small businesses, was offered as the main factor which contributed towards ease of communication with staff on this matter. Owners and managers often spoke to staff on a one to one basis in order to ensure that each of them had the information they needed to do their job effectively. Furthermore, given the size of the team, there were no perceived issues in terms of being able to cascade information effectively throughout the business.

*'I think that it is easy (to cascade information) because we don't have that many staff. They're mostly friends of mine, so it's all very in house. We're based in a small market town and it's very easy to communicate with everybody.'*

(Owner, Delicatessen, 5-10 staff)

Language barriers, among the businesses we spoke to in the follow up research, were not perceived to be a problem in the provision of allergy information to staff. Due to the dominance of orally providing allergy information and that fact that staff, in the businesses we talked to, spoke the same language as the owner or manager, the communication of this information was not an issue.

Regardless of the fact that many of the businesses we spoke to in the follow up research had no strictly formal processes in place to ensure that staff had the information they required and complied with good practice, owners and managers were still confident that staff did retain the information they needed. Rationalisation for this among the businesses we spoke to centred on placing trust in their staff and relying on common sense to ensure that procedure was followed.

*'There is no formal way to ensure that staff have acquired this information, but as I provide it on a one to one basis I just instruct and hope that staff have taken the information on board.'*

(Owner, Delicatessen, 5-10 staff)

One of the larger businesses that we spoke to in the follow up research also stressed that staff were simply following established processes and procedures as part of their everyday job role.

*'Staff members comply with good practice because it is expected of them and it is an important part of their job responsibility.'*

(Manager, Transportation catering, 11+ staff)

In terms of the time and cost involved in providing staff with allergy information, food businesses spoken to in the follow up research believed there were no significant financial costs in doing so. Time spent in providing this information was identified as a factor, although it was recognised that it only took up a small amount of time. It was difficult for food businesses to assign a meaningful value of time to providing allergy information and training because it was typically provided in wider inductions and team briefings along with other information. On top of this, there was a feeling that providing this information was simply part of the owner/manager's job and therefore could not be separated as a discreet task.

*'There isn't any cost to it, just a bit of my time that's all.'*

(Owner, Sandwich, 5-10 staff)

*'I don't think there are any costs because it's part of our job and it's the same with time, it's part of the job.'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

Food businesses were asked about the type of support that would make it easier for them to provide staff with allergen information. There was no consensus, among businesses spoken to in the follow up research, on the nature of the support that would make this easier, with responses ranging between those that would find a DVD most helpful, those that would find leaflets to be of most benefit and those that felt there was no need for support in any form. Those who would prefer support in DVD form cited that they would be able to show it during team meetings and training sessions and that it could provide a more engaging format of information for staff. A leaflet containing allergy information was popular among those who liked the idea of having relevant literature on the subject in hard copy format that could be given out to staff who could take it away and read at their own leisure.

*'I think definitely a DVD that would be very helpful because you can get the staff to sit down and again you can get them to sign to say they've watched it.'*

(Manager, Care home, 11+ staff)

*'I suppose just to have some information leaflets so they can have some literature to take home with them to read. I don't think DVDs would be good because after you've been working here all day I think the last thing they want to do is go home and put a DVD on. But I think if I give them some literature to read I think that is a better way to go.'*

(Owner, Sandwich shop, 5-10 staff)

Thinking about the content of the support required, there was a desire among the food businesses spoken to in the follow up research, to be updated with any new information on allergens that comes out, such as ingredients that have recently been discovered to cause an allergic reaction in somebody or new guidelines on the subject. There was an appetite for this type of information to be accessible online, or for regular updates to be sent out via email, although demand for online services was less than for leaflets and DVDs in terms of more general support. A multi-model approach may therefore be best in supporting and communicating with food businesses, as was also found to be the case in the evidence review on regulatory cultures and behaviours (IES, 2010).

*'It is knowing information is there, and seeing updates...would like to be confident that it was regularly updated whenever legislation or directions changed to know that it was a reliable source of information on the subject.'*

(Manager, Pre-school, 11+ staff)

Whichever type of support is provided, be it through online channels, leaflets or DVDs, it should contain information that is reader/watcher friendly and should be easily disseminated to staff.

*'I guess updating us on a regular basis on any allergens that are out there. I think written information is probably easier because you can hand things to staff. But I think it should just be facts and figures, rather than a lot of waffle that people don't need to know and won't have the time to sit down and read. I suppose factual leaflets which are to the point'*

(Manager, Pre-school, 11+ staff)

While the pervading feeling among the food businesses we spoke to in the follow up research was that this support should be provided by the Food Standard Agency (FSA), some did feel that Environmental Health Officers would be well placed to provide support on allergens. This was apparent among food businesses that we spoke to where the FSA was a relatively unknown organisation to them. This would therefore suggest an opportunity for the FSA to make themselves more visible to food businesses if they are to maximise the impact of their guidance.

*'Not everyone who owns a food business know the FSA, but everyone knows who EHO are, so they are key'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

### **Case study 3 – Did not provide staff with allergen information (Chef Manager, Care Home, 11+ staff)**

The Chef Manager's main responsibilities at the care home included ordering in the food, stock taking and cooking. The care home did not provide staff with allergen information as a matter of course. The reason for this was that if staff did not tend to ask for this type of information. If a member of staff did specifically ask for information on this topic it would be provided orally, however this did not happen very frequently and if staff did not ask then they were not provided with information about it.

Suggestions for support that would be helpful in starting to provide allergy information to staff included having a folder with all of the relevant information in it and a flip chart to keep in the kitchen. Furthermore, a DVD was thought to be very helpful, largely because staff could be shown this in groups and it could be recorded that they had viewed it.

Having said this, the chef manager did assume responsibility for providing allergy information to staff and made it known that it came down to her as an individual to source information and make sure that this was disseminated among staff. For this reason it was also noted that if the FSA had relevant information on their website, this could be adapted for staff training.



**Case study 4 – Provided staff with allergen information on an oral basis only (Director, Chinese / Indian Restaurant / takeaway, 5-10 staff)**

The restaurant sold modern oriental food and was run by the director, responsible for production and front of house, along with his wife who was responsible for the kitchen operation, including the cooking.

Full time staff were trained on allergens orally, which consisted of being given information on the basic ingredients that went into the dishes; no materials for staff training were used. It was seen as important to learn about allergens because questions about this came up regularly from customers. Part time staff were not given training on allergens, and instead were instructed that if a situation arose where they were asked for this kind of information, that they must pass the query on to the director or to any of the full time staff, who would be able to deal with it.

The restaurant did not perceive there to be any challenges in providing staff with information on allergens, and felt that as they trust the competence of their staff there were unlikely to be any future problems in this area. Given the small team, cascading information to staff was not a problem; in addition, new staff joined infrequently which meant that this did not crop up as a difficulty in the provision of allergen information.

Thinking about the costs associated with providing allergy information, the director did not recognise any financial or time costs that could be attributed specifically to this, because he just saw it as part of the job.

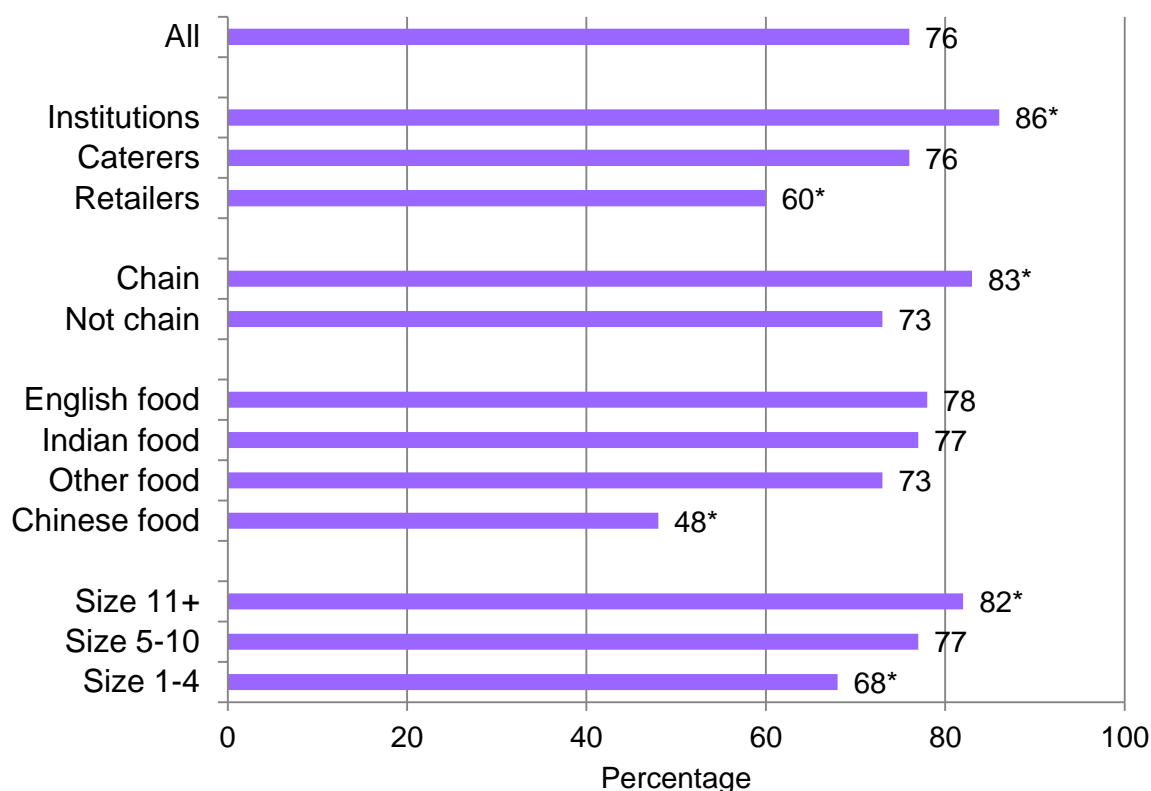
In terms of support, literature from the FSA to reinforce the importance of food allergies was welcomed by the restaurant, and would ideally be of use to help staff tell customers what is in the food. Poster booklets were specifically suggested as a more helpful alternative to having to put detailed allergen information on the menu. The director believed customers would not read this, and that it would create a lot of extra work for the business but wouldn't necessarily make it safer.

### **5.3 Formal systems to avoid cross contamination**

Cross contamination issues are a key concern for the study and acknowledged as a challenge for food businesses at the scoping stage. Cross contamination examples highlighted during the scoping interviews included: the use of woks and other cooking equipment which are not typically washed between uses; the practice in some sandwich shops and other premises of having a single chopping board onto which a whole variety of ingredients are prepared; and open bakeries/patisseries which tend to sell many products with nuts and seeds which are handled by customers who then touch other foods.

Survey respondents were asked whether they have a formal system in place designed to prevent food allergen related cross contamination. A formal system includes routines and practices which all staff are made aware of and are expected to comply with. Findings are shown in Chart 5.9 which indicates widespread implementation of formal systems. 76% of food businesses operated a formal system, with some differences according to sector, size and nationality of food sold. Comparing broad sectors, institutions were most likely to have a formal system to avoid cross-contamination (86%) while retailers were least likely (60%). Chains were more likely than non-chains (83% and 73% respectively) and large businesses with 11 or more staff were more likely than small businesses with 4 or fewer staff (82% and 68% respectively). Finally, less than half (48%) of businesses selling Chinese food operated a formal system to prevent food allergen cross contamination.

**Chart 5.9: Proportion of food business with a formal system in place to prevent allergy related cross contamination**



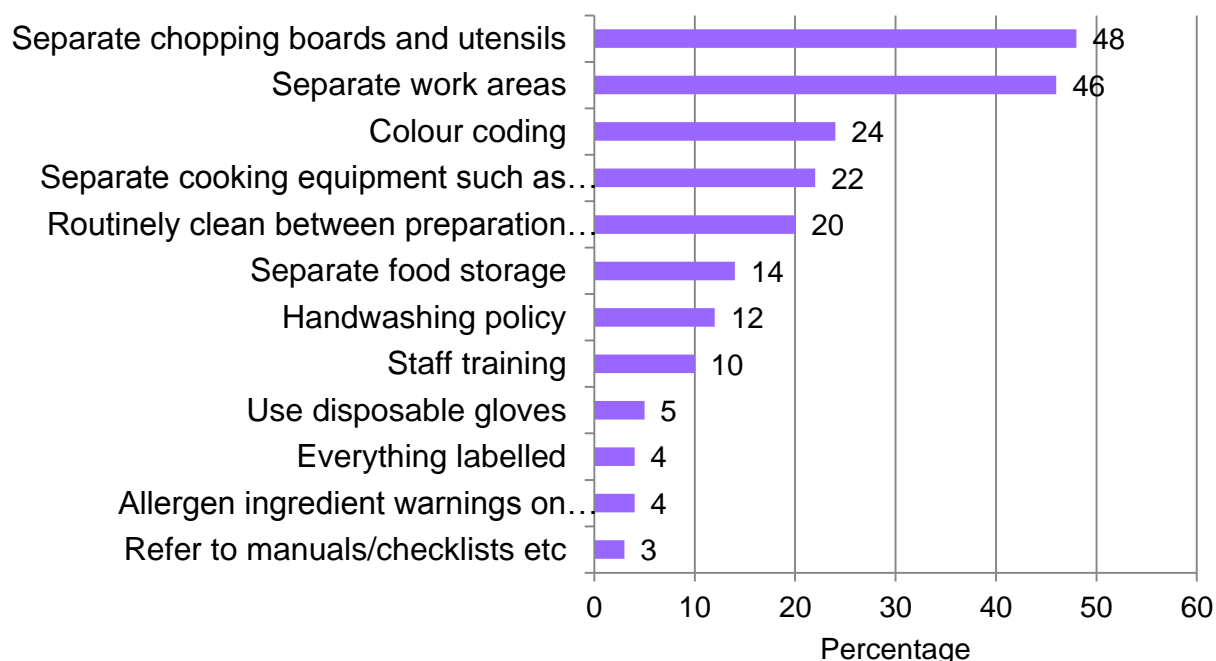
Base: All 1666; retailer (401); caterer (956); institution (309); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184); English food (302); Other food (128); Chinese food (31); Indian food (23).

Q:B2. *Do you have formal systems in place to prevent cross contamination in relation to food allergens?*

Note: \* denotes a statistically significant difference to all other groups in the category.

Chart 5.10 sets out the range of systems and practices deployed, by food businesses with a formal system in place, to prevent cross contamination. The most prevalent approach was to ensure separation of chopping boards and utensils when preparing food (48%), followed by use of separate work areas (46%). Around one fifth to one quarter of businesses used: colour coding (24%); separate cooking equipment (22%); or routine cleaning between preparation tasks (20%). Separate food storage was used by 14% of businesses and 12% have implemented a formal hand-washing policy. Other systems referred to, but used by 5% or fewer businesses, included: use of disposable gloves; labelling of all foods and use of allergen ingredient warnings on containers.

**Chart 5.10: Systems used to prevent allergy related cross contamination**



Base: 1240 food businesses with a system in place

Q: B3. *What systems do you use?*

Table 5.2 shows the prevalence of particular practices and systems across different types of food business than others. Comparing broad sectors, the main difference arises due to their distinct operations. Many retailers did not cook produce on their premises so were least likely to use colour coding (11% compared with 25-27% of caterers and institutions), separate chopping boards (26% compared with 51% of caterers and institutions) or cooking equipment (10% compared with 24% of retailers and institutions).

Differences by business size are not statistically significant with two exceptions: large businesses with 11 or more staff were more likely to say that they avoid cross contamination by means of staff training (14%) compared with small businesses with fewer than five staff (7%). The larger businesses were also more likely to use colour coding (30%) than smaller businesses (18%).

Differences by country, shown in Table 5.3, were also mainly statistically insignificant with three exceptions. Staff training on cross contamination was most widespread in Wales (14%) compared with 9-10% elsewhere. Colour coding was most prevalent in England (25%) and Wales (21%) compared with Scotland and Northern Ireland (15-16%). Use of separate chopping boards and utensils was also more common in England (49%) and Wales (48%) compared with Scotland (42%) and Northern Ireland (31%).

**Table 5.2: Systems used to prevent allergy related cross contamination by food business type**

	Caterers	Retailers	Institutions	1-4	5-10	11+	All
Cell percentages							
Staff training	9	9	14	7	9	14	10
Colour coding	25	11	27	18	21	30	24
Allergen ingredient warnings on containers	4	2	7	2	7	5	4
Separate work areas	47	48	43	44	42	49	46
Separate chopping boards and utensils	51	26	51	44	49	50	48
Separate cooking equipment such as woks and pans	24	10	24	20	21	24	22
Handwashing policy	12	11	15	10	14	13	12
Routinely clean between preparation tasks	20	17	20	21	21	18	20

Separate food storage	14	16	14	18	14	12	14
Use disposable gloves	5	3	6	5	3	5	5
Everything labelled	5	4	2	5	4	3	4
Refer to manuals/checklists	3	4	3	4	3	3	3
N	735	247	258	400	343	486	1240

Base: food businesses which have a system in place

Q: B3. *What systems do you use?* Multiple response option

Note: \* denotes a statistically significant difference to all other groups in the category.

**Table 5.3: Systems used to prevent allergy related cross contamination: by country**

	a. England	b. Scotland	c. Northern Ireland	d. Wales
Cell percentages				
Staff training	10	9	9	14*
Colour coding	25 <sup>bc</sup>	15	16	21 <sup>bc</sup>
Allergen ingredient warnings on containers	4	7	3	1
Separate work areas	45	50	49	42
Separate chopping boards and utensils	49 <sup>bc</sup>	42	31	48 <sup>bc</sup>
Separate cooking equipment such as woks and pans	22	29	16	19
Hand-washing policy	12	18	14	14
Routinely clean between preparation tasks	20	19	12	22
Separate food storage	15	11	16	9
Use disposable gloves	5	3	5	6
Everything labelled	4	5	6	3
	3	8	3	5

Refer to manuals/checklists etc

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N	851	154	127	108
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Base: food businesses which have a system in place

Q: B3. *What systems do you use?* Multiple response option

Note: Statistically significant differences between just some groups within the category are denoted with lower case letters

### **Follow-up findings – Formal systems to avoid cross contamination**

Follow up research specifically explored reasons for not having formal systems in place to avoid cross contamination. Among businesses we spoke to in the follow up research who did not have a formal system, there was simply no need for a policy due to the nature of their business, such as being a convenience store. Other types of business cited lack of space as the mitigating factor in not having adequate processes in place, suggesting that although they did what they could to wash down surfaces, limited space and utensils meant that the same area and implements had to be used for multiple ingredients. The cost of additional equipment and utensils was also a barrier.

*‘The main restriction on not having formal systems for cross contamination is the size of the production area – it is a small kitchen. We do not use separate pans or equipment, because it would become costly for me to use separate equipment’*

(Owner, Delicatessen, 5-10 staff)

Follow up research also briefly explored the issue of consumer cross contamination, this is where the customer has the potential to mix different foods or ingredients themselves, for example, at a self-service salad bar or self-service bakery area. Among the food businesses spoken to in the follow up research this was not identified as a big risk because they did not, on the whole, have self service areas. However, the feeling among those that did have a self-service area was that this made it impossible to avoid cross contamination and was something which could not be fully controlled given its nature. One business spoken to in the follow up research that previously had a self-service counter no longer had such an area because customers mixed up spoons.



## **6 Awareness of the new law, the need for change in practices and preferred type of help**

Whilst ensuring that food businesses comply with legal requirements and, where appropriate, with recognised best practice guidance, the FSA also endeavours to work with the food industry and assist them in the production of safe food. Evidence from the food allergens baseline survey can help the FSA in identifying the type and scale of assistance that food businesses would welcome and benefit from.

Section 6.1 examines the scale of awareness and how it is distributed among different types of business across the UK. Section 6.2 investigates whether businesses anticipate any difficulties in complying with the new legal framework for food allergen information provision. Section 6.3 explores the type and source of information that would help food businesses to introduce and maintain any changes necessary to become fully compliant. Section 6.4 investigates specific challenges which might arise, such as the need to change menus regularly.

Overall, this section provides the FSA and other bodies with information that might feed into: business support mechanisms; targeted promotion of awareness; and the provision of guidance, documentation and advice.

### **Summary**

- **Awareness of the new legislation**
  - 19% of food businesses were aware of the new legislation.
  - Awareness was highest in Scotland (30%) and lowest in Wales (14%).
  - Rates of awareness differed within the catering business sector – from a low of 14% in sandwich shops to a high of 25-26% in pubs and restaurants. Differences within other sub-sectors were not wide or were not statistically significant.
  - Among those aware, the follow up interviews suggest there is some confusion about what the new legislation involves and what measures will need to be taken.

- **Anticipated challenges**

- Of those businesses that were aware of the new legislation 52% of the businesses surveyed anticipated that introducing changes to become compliant with the new law would be 'easy'. The FSA will be following up this work with those businesses not aware of the legislation to establish the anticipated difficulty in complying with the legislation.
- At the follow up stage, some businesses that relied heavily on printed menus and fixed signage, envisaged changes to labelling as more of a challenge.
- Over half the businesses acknowledged that they would need to implement a range of changes including: provision of more training on allergens for their staff (69%), provision of allergy information on a wider range of meals or products (66%) and provision of information in relation to a wider range of allergens (65%).
- Slightly fewer businesses agreed that they would need to make changes to their record keeping on products and ingredients and/or request catering contractors provide more information on ingredients (57% in each case).

- **Support**

- The most widely preferred type of support about the provision of food allergen information is hard copy booklets or documents (cited as preferable by 86% of food businesses).
- Also widely cited as helpful was online documentation or face to face delivery of information or advice from EHO/TSOs (76%).
- Smaller proportions of food businesses also expressed interest in receiving information in the form of case studies, by means of a DVD or via workshops/ seminars (57, 52 and 48% respectively).
- Follow up research highlighted the need for clear information on what will be expected of food businesses and prescriptive guidelines instructing them what to do in order to fulfil their obligations.

## 6.1 Awareness of the new law

There was broad recognition among the respondents interviewed at the scoping stage that publicity to promote awareness of the new EU law was needed. EHOs/TSOs interviewed suspected that awareness of forthcoming legislation is not widespread and that while knowledge of nuts as allergens is widespread, few others are understood - celery and mustard were raised as examples which are rarely recognised as allergens.

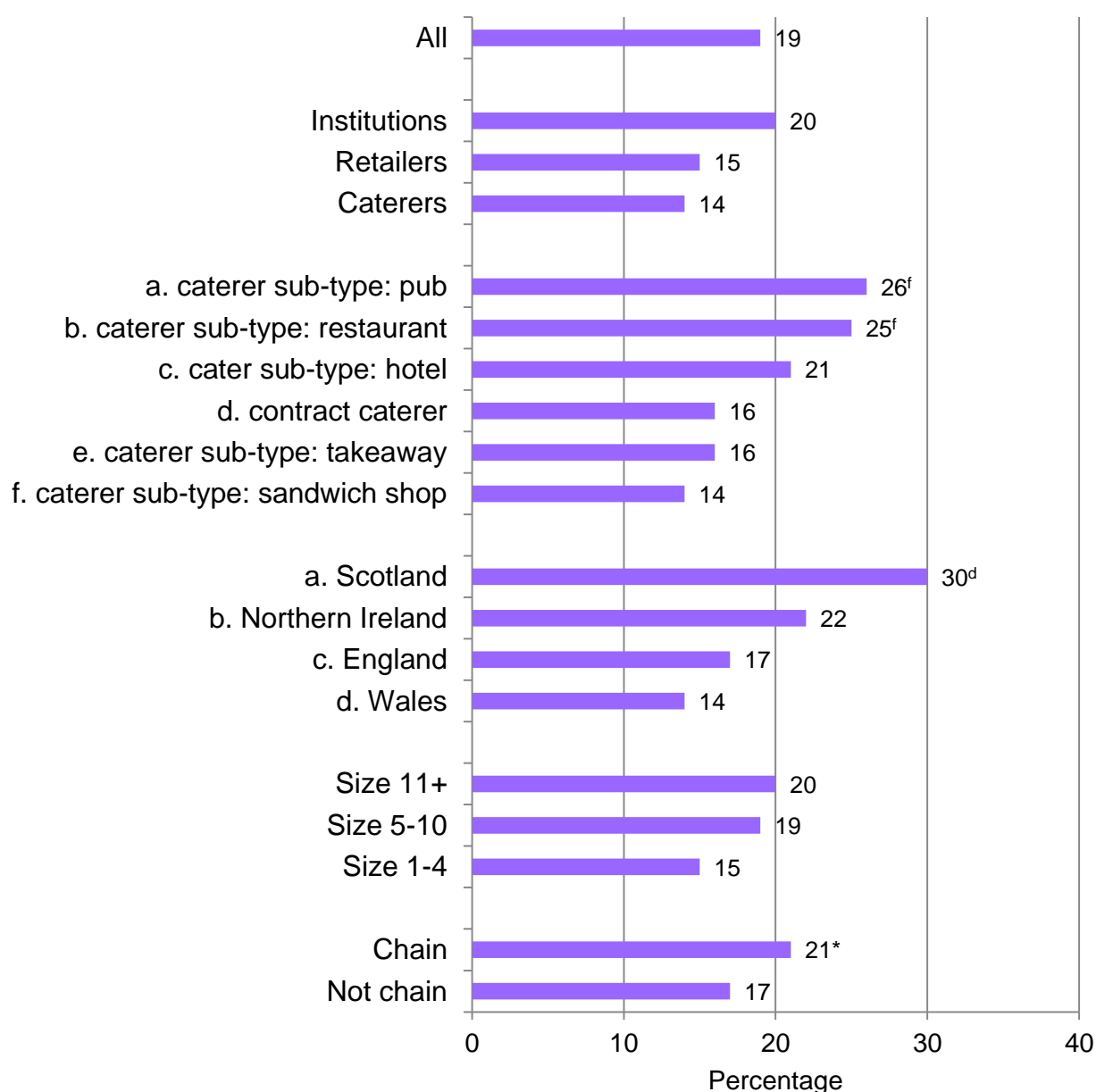
One policy expert suggested that most food businesses are aware of allergy risks as a concept but less aware of high quality controls. It was suggested that particular issues that need to be communicated to food businesses relate to the ingredients of products and minimising the risk of cross-contamination by having separate production areas, cleaning preparation areas and also by hand washing. Food businesses therefore need to be encouraged to incorporate allergy awareness and practices into their HACCP systems.

According to one policy expert, EHOs need to ensure that food businesses are aware of FSA or other guidance and, more importantly, need to ask probing questions about allergy labelling and food preparation for customers with allergies. If EHOs don't ask these questions, it was suggested, the issue will become secondary i.e. caterers will perceive it to be less important than food hygiene issues.

Looking at findings from the allergen baseline survey, presented in Chart 6.1, a widespread campaign promoting awareness of regulatory change would seem to be necessary, as awareness in late 2012 was fairly low. Just 19% of businesses described themselves as aware of the new EU legislation. Awareness was highest in Scotland at 30% and lowest in Wales at 14% compared with 17% in England and 22% in Northern Ireland.

Rates of awareness differed within the catering business sector – from a low of 14% in sandwich shops to a high of 25-26% in pubs and restaurants. Differences within other sub-sectors were not wide or were not statistically significant.

**Chart 6.1: Awareness of the new EU legislation relating to food allergen information provision among different types of food business**



Base: All (1666); retailer (401); caterer (956); institution (309); hotel (62); pub/bar (268); contract caterer (127); care home/hospital (85); secondary school (55); pre-school (80); defence (49); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184)

Q:C1. Are you aware of the new EU regulations which are being introduced in 2014? These will make it compulsory to provide information on the 14 various allergens we discussed earlier.

Note: \* denotes a statistically significant difference to all other groups in the category.

Statistically significant differences between just some groups within the category are denoted with lower case letters

## **Follow-up findings – Awareness of new law**

When exploring awareness and understanding of the new law in the follow up research, there was little information that the food businesses we spoke to could provide on the new legislation. Indeed there was some confusion about what the new legislation meant and in turn the impact that it would have on their businesses. This ranged from not knowing what the legislation means at all to not knowing the exact actions that will need to be taken in relation to providing allergen information. However, businesses did envisage that they would need to start adding more information to labels, notices, boards and menus. Some of the businesses we spoke to in the follow up research that already used labels, boards and other signage saw this as a relatively easy task. However, other businesses that provided little or no information recognised they may have to go back to the drawing board and re-design their whole business processes.

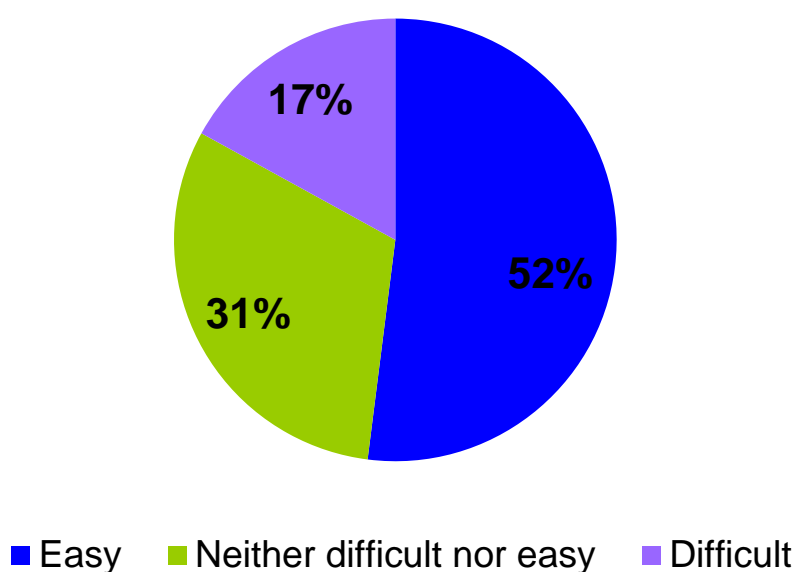
## **6.2 Challenges**

At the scoping stage, several issues were raised as potential challenges for businesses seeking to implement good practice in relation to the provision of food allergen information. These included:

- Costs – associated with introducing changes to systems, practices and menus
- Time and expertise – due to the burden of regulation, becoming familiar with new legislative requirements and implementing necessary changes
- Staff training – particularly in businesses where staff turnover is high or in businesses which rely on hourly paid staff with little time for training
- Supplier information – it can be a challenge getting detailed and accurate information from suppliers

During the baseline allergen survey, only food businesses which were aware of the new EU legislation were asked whether they perceived the legal changes as likely to pose difficulties. Overall, just 19% of food businesses (i.e. 321) were aware of the impending EU legislation. These businesses were asked, on a scale of 1-5 (where 1 is 'very difficult' and 5 is 'very easy'), how they foresaw the ease or difficulty in complying with the new law. 17% anticipated the changes would be 'difficult' or 'very difficult'; 31% anticipated the changes would be neither difficult nor easy, or were unsure; while the remaining majority of 52% anticipated the changes would be easily accommodated – graphically summarised in Chart 6.2.

**Chart 6.2: Anticipated difficulty in complying with the new food allergens law in those with an awareness of the legislation.**



Base: 321 businesses aware of the new law

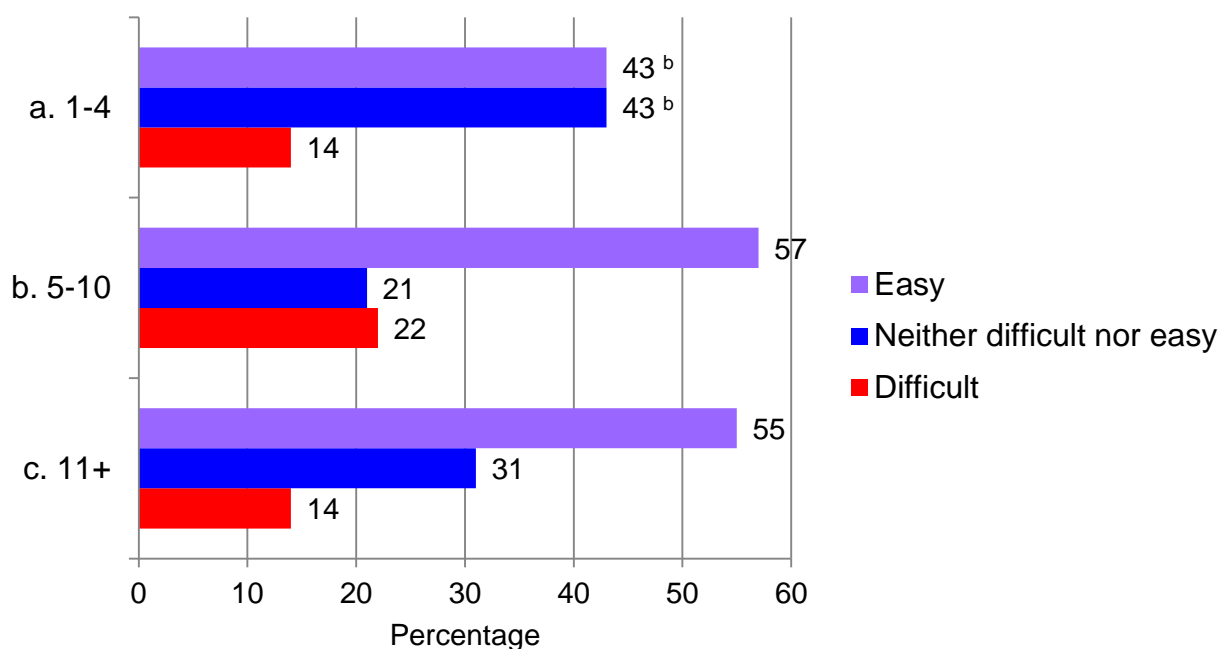
Q:C3 On a scale of 1-5, where 1 is 'very difficult' and 5 is 'very easy' how do you foresee the ease or difficulty in complying?

The FSA is undertaking additional research to explore this finding further. Only 321 businesses (i.e. those already aware of the legislation) answered this question, raising the possibility that the findings are not representative of the wider food business population. Further work will be undertaken in those businesses with no or limited knowledge of the Regulation to establish the anticipated difficulty in complying with the new law and the practices to be implemented to comply.

Sectoral differences in the probability of perceiving necessary changes as difficult were not statistically significantly different. Some differences by business size were evident, however, and are presented in Chart 6.3. Small businesses with 1-4 staff were least likely to anticipate changes would be 'easy' (43% compared with 57% and 55% among businesses with 5-10 and 11+ staff respectively). However, it was businesses with 5-10 staff who were most likely to say that the changes would be 'difficult' (22% compared with 14% in both smaller and larger businesses).

Sample sizes were too small to undertake additional breakdowns such as by sector and country.

**Chart 6.3: Anticipated difficulty in complying with the new food allergens information law – by business size**



Base: Businesses aware of the new law: size 1-4 (93); size 5-10 (95); size 11+ (132)

Q:C3 On a scale of 1-5, where 1 is 'very difficult' and 5 is 'very easy' how do you foresee the ease or difficulty in complying?

Note: Statistically significant differences between just some groups within the category are denoted with lower case letters

The 57 businesses which anticipated changes to comply with the new law would be difficult were asked what they thought would be the main challenges (multiple responses were permitted). The most common responses were as follows: checking ingredients from suppliers (38%); time it will take to update menus or food labels (28%); logging and record keeping of food allergen information (24%); cost of regular updating of information (19%); remembering to make updates (10%); and staff training.

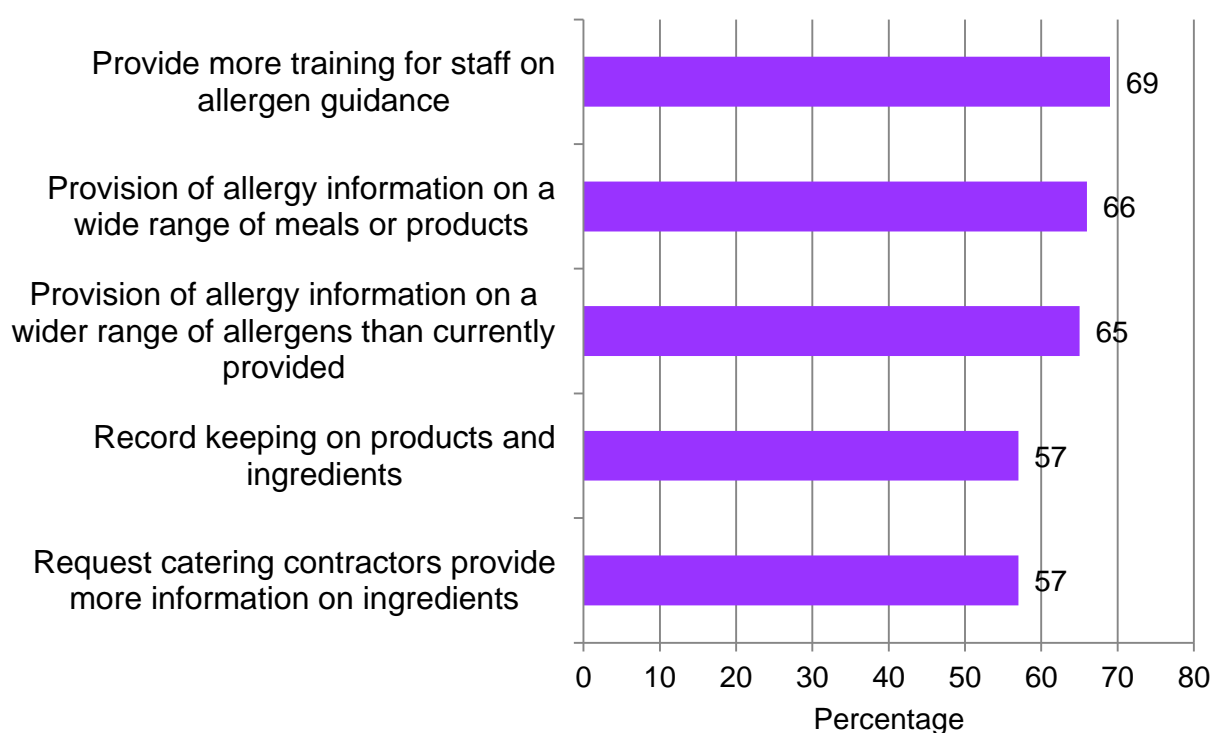
Businesses aware of the new legislation (n=321) were asked what changes they would need to introduce in order to become fully compliant with the new law. Findings are presented in Chart 6.4. The list of changes were read to respondents who were asked to indicate whether they would or would not need to make the change. The change which



most businesses agreed they would need to implement was the provision of more training on food allergens for their staff (69%), followed by provision of allergy information on a wider range of meals or products (66%) or in relation to a wider range of allergens (65%). Slightly fewer businesses, but still more than half, agreed that they would need to make changes to their record keeping on products and ingredients and/or request catering contractors provide more information on ingredients (57% in each case)

Sample sizes were too small for further disaggregation by country or business type. No significant differences in response were evident by business size.

**Chart 6.4: Anticipated changes which will need to be introduced in order to comply with the new law by those businesses aware of the legislation**



Base: 321 businesses aware of the new law

Q:C2. Will you need to make changes to any of the following in order to comply with the new law? Multiple response option.

## Follow-up findings – Anticipated changes associated with the new legislation

In order to further explore the potential impact of the new legislation, a more detailed explanation of the legislation was given to food businesses in the follow up research. In addition, unlike in the quantitative research, *all* businesses in the follow up research were asked what they felt the impacts of the new legislation might be, even those who were initially unaware of the legislation. It is important to note however, that due to the way the sample was selected for the follow up research (please see methodology section), only certain views are explored rather than the full breadth of views around this issue.

The pervading feeling among these businesses was that the changes required would not be too difficult to make. Even businesses we spoke to who were unsure of the details perceived that the changes would be within their capabilities.

*'I'm presuming I would be sent information on new changes, so it shouldn't be a problem to do. I don't know if there will be any difficult changes to make. The staff are very good and they're open to new things so I don't feel it will be a problem.'*

(Manager, Pre-school, 11+ staff)

*'I'm not too sure how it's going to be enforced so it's difficult for me to say. But I would assume that we would maybe have to put it on the menu itself'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

Businesses that felt only minor tweaks would be in order included those we spoke to in the follow up research that do not currently use printed menus and signs, where information is primarily provided on boards and homemade signs.

*'It will be relatively easy to introduce these changes – as we have all the information currently, it will just be a matter of presenting it in a different way to our customers.'*

(Owner, Delicatessens, 5-10 staff)

However, the businesses we spoke to that rely heavily on printed menus and fixed signage, such as Chinese / Indian restaurants / takeaways; saw the changes to labelling and provision of allergen information as more of a challenge.

*'It will be difficult because I will have to change the menu and the website, it will take around a month to change everything.'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

*'I think it will be hard to change the menu because we're got over a hundred dishes. I think it will be difficult for us to print on additional information about each dish and also it will be inconvenient for the customer because they don't want to look at all the detail.'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

Furthermore, the ease of implementing the new changes will be dependent on having adequate time to make the necessary changes and provision of clear information which sets out exactly what this will mean for certain types of business.

*'I need to know more detail about the legislation but I don't think the changes I need to make are going to be backbreaking – I can probably make them in half a day.'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

Additional staff training was identified as a likely necessary change among the businesses spoken to in the follow up research, involving updating staff on the new law and providing them with more in depth training to make them aware of the increased responsibilities associated with the legislation and have a more detailed understanding of the food products sold or served.

*'At the moment the members of staff would know that it is 'chicken curry' for example and that it contained 'chicken' and 'curry', but in future they will have to have more detailed information about all the ingredients in order to comply with the law.'*

(Manager, Transportation Catering, 11+ staff)

At this stage the food business we spoke to as part of the follow up research do not have a sense of the time and cost implications that will be associated with adhering to the new guidelines and were not able to give estimations. Those that could provide a bit more detail around this has mixed feelings, with some of the businesses we spoke to being pragmatic about the changes, envisaging that they could incorporate some of the changes into existing processes, training and costs so that it would only have minor time and financial costs.

*'I don't think it will cost anymore, it will just be a matter of putting it in place. I think the main cost and time will be the actual reprinting of the menus that will be the main cost for us. But if we can do this so it coincides with a menu update then it won't make much of a difference.'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

Others that we spoke to in the follow up research were less enthusiastic, seeing the new legislation as a burden that was likely to take up more time. However, on the whole businesses were keen to find out more about what they will need to do in order to comply with the new legislation.

*'It's hard to say about the costs because I don't know the details, but I can foresee it is going to waste a lot of time for us and customers.'*

(Owner, Chinese / Indian restaurant / takeaway, 5-10 staff)

### **Case study 5 – Unclear of the impact new legislation will have (Owner, Fishmonger, 1-4 staff)**

The fishmongers primarily sold fresh fish, shell fish and prepacked smoked fish. The business did not have a policy, formal or otherwise, on allergen labelling and did not currently provide staff with information relating to allergens.

The owner was not aware of the new law in regard to allergen labelling from any other source, prior to our contact with them. In addition, they were unsure of the type of changes needed in accordance with the new legislation and were not sure how relevant the new law was to their products. He was therefore unable to envisage the time and costs that would be involved in complying with the new law, although indicated that he did not think the business would have to do significantly more than they do already and that the changes would likely just be down to common sense. The owner believed that if it was an obligation then he would do whatever he had to do.

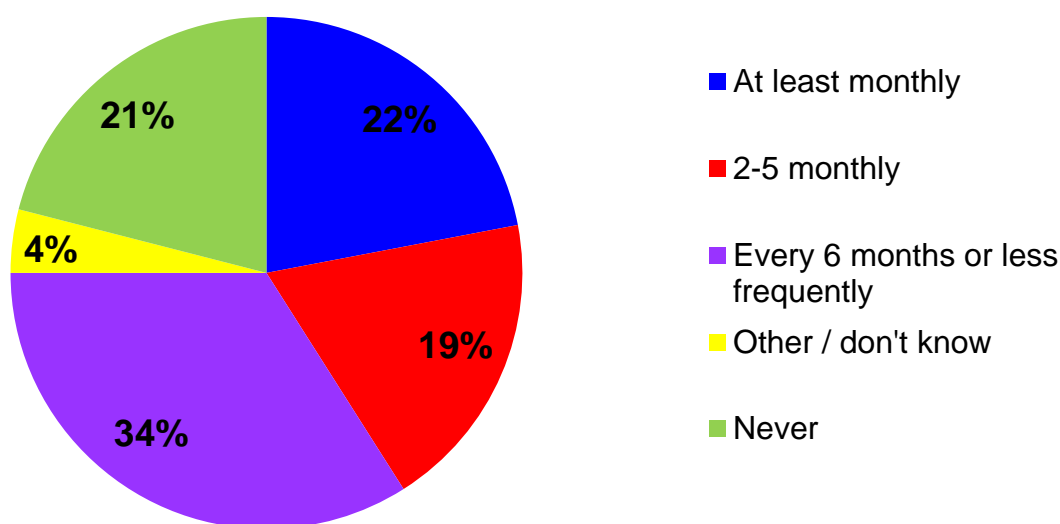
Laminated sheets containing the relevant allergen information would be the most beneficial for of support to the business as it would be the most effective way of information customers about the products on sale. The owner would like to see these come from the FSA originally, but to be filtered down through the Environmental Health Office to ensure consistency of the message across relevant parties. The information supplied should be conveyed in a way in which ordinary employers can understand what is required of them and must be clear, accessible and user friendly.

## **6.3 Specific challenges – regularity of changing menus/ range of products sold and updating information**

Costs and time associated with introducing changes to systems and menus were raised at the scoping stage as a potential source of difficulty for businesses in seeking to comply with the new EU legislation. Owner/managers were therefore asked how often they changed their meals or products, in order to gauge whether regular updating of information may indeed represent a widespread challenge. Chart 6.5 summarises the data, indicating

whether meals or products are changed at least monthly, less often than monthly but more often than 6 monthly, 6 monthly/less frequently, never, or 'other' (including 'as needed'). For half the food businesses (55%), the incidence of changing menus or product lines is either 'never' or not frequently, arising every six months or less often. Around one fifth (19%) implemented changes between 2-5 monthly and a further fifth (22%) introduced changes on at least a monthly basis. It is the latter fifth who would experience the greatest inconvenience in terms of regularly needing to update written menus or labels to keep consumers informed.

**Chart 6.5: Regularity with which meals or range of products are changed**



Base:1666

Q:C8 *Approximately how often do you change your meals or the range of products you sell or provide?*

The survey addressed the issue of updating information by asking owners/managers whether they currently update written menus, labels or other materials each time menus, meals, ingredients or products are changed. Chart 6.6 indicates that among businesses which do provide food allergen information and do at least sometimes change their meals or products, 65% updated their written information on each occasion of change. The remaining 35% of businesses which did not efficiently update their information may therefore pose a risk for consumers with allergies and represent a target group which

would benefit from information and advice in relation to best practice prior to legislative change.

Comparing different business sectors, caterers were the most likely to update their written information promptly (69%) while institutions were the least likely (59%). Within the catering sub-sector, updating information as soon as menus or products changed was most widespread among restaurants (74%) and least common among contract caterers (58%). Differences in the incidence of updating information were also evident within the institutions sub-sector – most commonly practiced in pre-schools (68%) and least often in care-homes (49%).

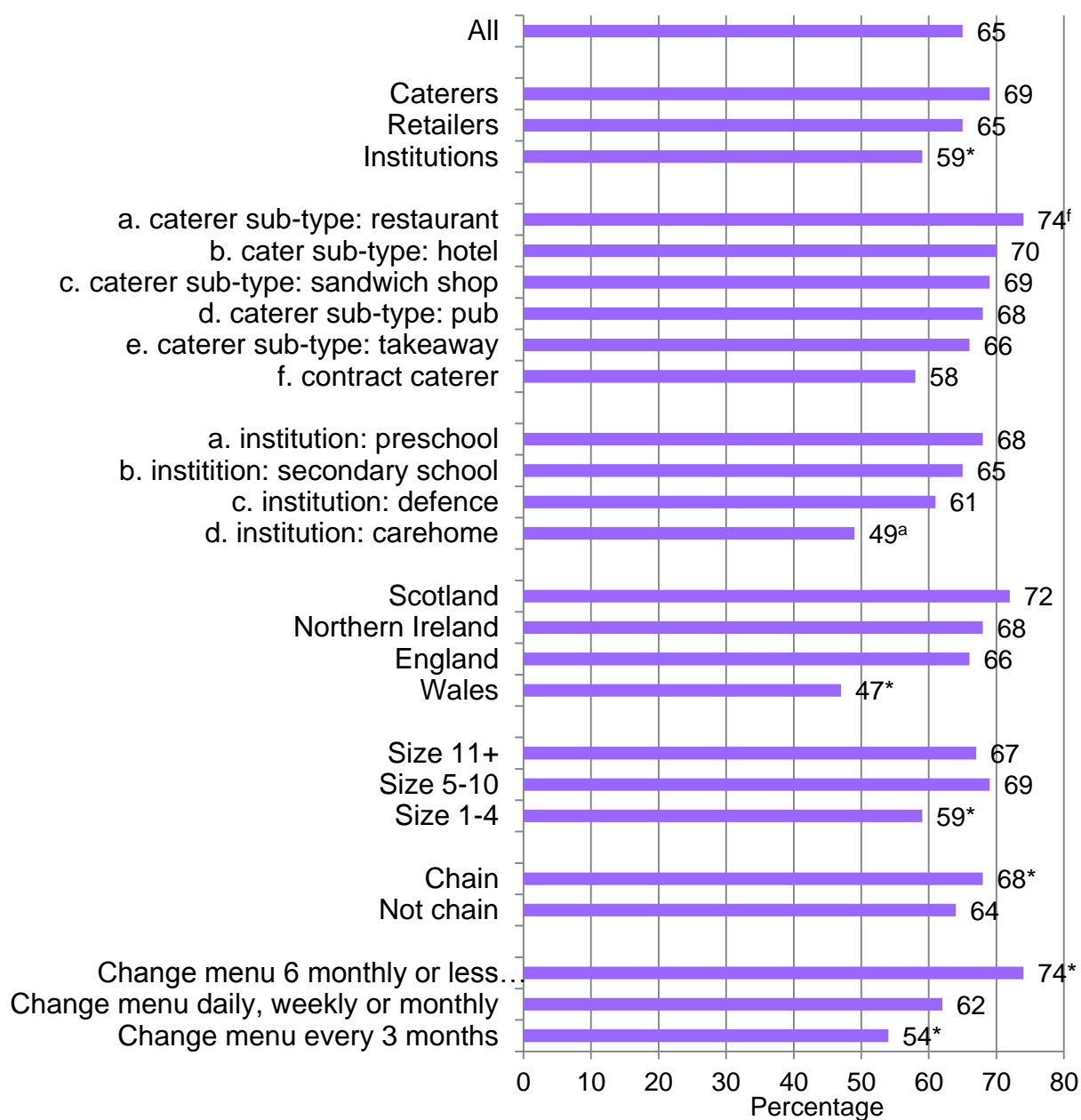
In terms of country differences, businesses in Scotland were most likely to keep written menus or labels up to date (72%), while businesses in Wales were least likely (47%).

Business size is also associated with updating of information practices – compared with larger businesses employing at least 5 staff (67-69% of which updated their written information) a smaller 59% of businesses employing 4 staff or fewer promptly updated their written information.

The regularity with which menu choices and product lines are changed was also associated with how likely businesses were to keep their written information up to date. Among businesses which changed their menus and products infrequently, i.e. every 6 months or less often, 74% updated their written information on each occasion of change. At the other extreme, where businesses change their menus or products daily, weekly or monthly, 62% promptly update their written information. However, businesses which fall between these extremes and change their menus or products on a 3 monthly basis were the least likely at 54% to keep their written information up to date.

Practices among chains and non-chains differed little, with 68% and 64% respectively updating their written information as soon as their menus or products changed.

**Chart 6.6: Proportion of food businesses which update written menus or labels every time the menu or products sold are changed**



Base: 1265 businesses which provide allergen information and change their meals or products

Q.C9. *Do you review your communication / update your written labels or menus of allergy information every time you change your menu or the products that you sell or provide?*

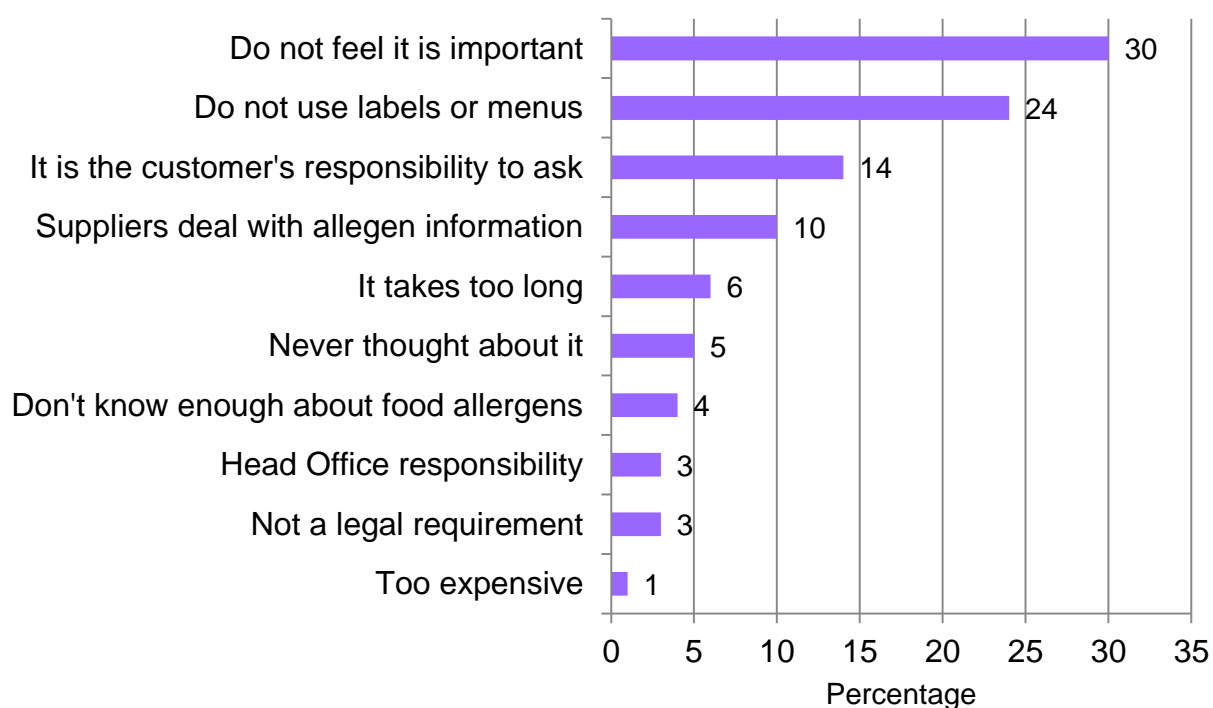
Note: \* denotes a statistically significant difference to all other groups in the category.



Statistically significant differences between just some groups within the category are denoted with lower case letters.

The businesses which did not update their information as meals or ingredients changed were asked why. Their responses are provided in Chart 6.7. The most common reason for not updating information was because the business owner/manager did not feel it was important (30%); 24% said they did not use menus, labels or other written information; 14% suggested that there was no need to update information because it is the responsibility of the customer to ask about ingredients; and 10% stated that their suppliers deal with the provision of food allergen information. Small proportions of food businesses indicated that they did not update their information promptly because: it takes too long (6%); they had not thought about it (5%); did not know enough about food allergens (4%); it is Head Office responsibility (3%); it is not a legal requirement (3%); and it is too expensive (1%).

**Chart 6.7: Reasons given for not updating food allergen information when meals or products changed**



Base: 281 businesses which do not update their information.

Q:C10 *Why don't you review your communication / update your written labels or menus of allergy information?*

A further potential challenge is the cost of printing – this may be perceived as an obstacle if menus, labels and other information needs to be updated regularly and especially if the business relies on external printing sources to provide their materials (which, it is assumed, may be more expensive than internal printing sources).

Initially, we look at the proportion of businesses which provide printed information relating to food allergens, whether on menus, labels or other materials (Chart 6.8). 38% provided printed menus or other printed information on food allergens. It should be noted that in section 3.3 it was reported that a much higher 72% of businesses provide written information in the form of menus, labels, packaging, posters and booklets. Some of these materials may be hand written however. In this section the question explicitly asks whether businesses provided ‘printed’ menus or other ‘printed’ information which partially explains the discrepancy in findings<sup>10</sup>.

Printing costs were more likely to represent a burden for institutions and caterers, 45% and 39% respectively of which provided printed information compared with 21% of retailers.

Within the catering sub-sector, pubs and restaurants most frequently provided printed information (50-51%) compared with 31-34% of hotels, sandwich shops and takeaways and 27% of contract caterers.

Differences in the provision of printed materials within institutions are also apparent, ranging from 62% of pre-schools to 31% of care-homes.

Some cross-country differences are also evident - 30% of Welsh businesses provided printed menus and other materials compared with 44% of businesses in Scotland. A larger

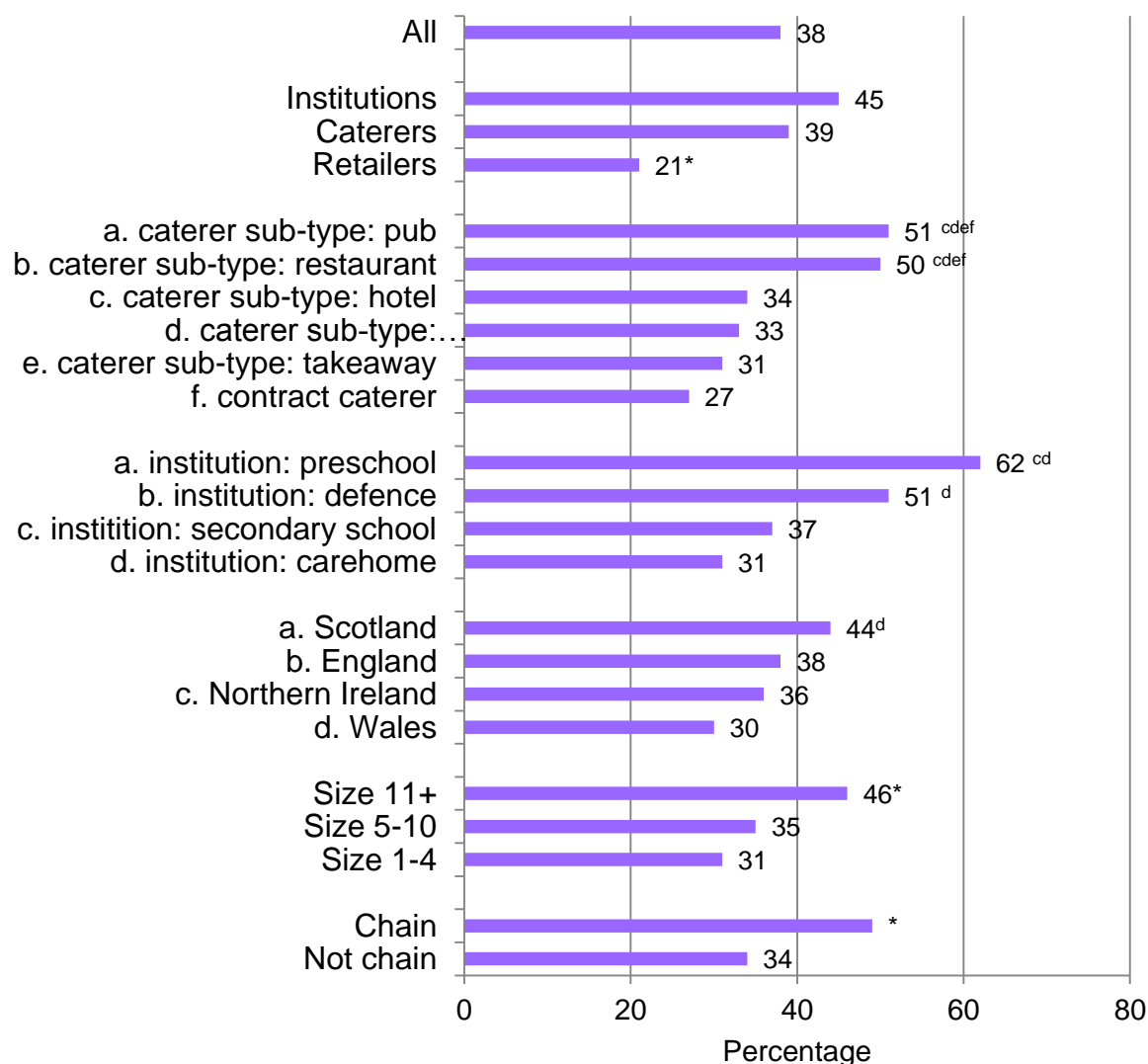
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<sup>10</sup> The discrepancy may also be attributable to question wording. The earlier question (A5) asked businesses whether they provided information in the form of menus, packaging, labels, posters and booklets or leaflets – listing each item separately and inviting a ‘yes’ or ‘no’ response. In question C11, used in this section, businesses were simply asked “Do you provide printed menus or other printed information on food allergens?”, to which respondents were able to reply yes or no.

proportion of business with 11 + staff provided printed materials (46%), compared with 35% of businesses with 5-10 staff and 31% of businesses with 1-4 staff.

Finally, chains were more likely to provide printed information (49%) than non-chains (34%).

**Chart 6.8: Proportion of food businesses which provide printed menus or other printed information on food allergens**



Base: All (1666); retailer (401); caterer (956); institution (309); takeaway (128); hotel (62); pub/bar (268); transport/contract caterer (127); care home/hospital (85) pre-school (80); other school (55); defence (49); size 1-4 (586); size 5-10 (452) size 11+ (613); England (1162); Scotland (198); NI (152); Wales (154); chain (479); non-chain (1184)

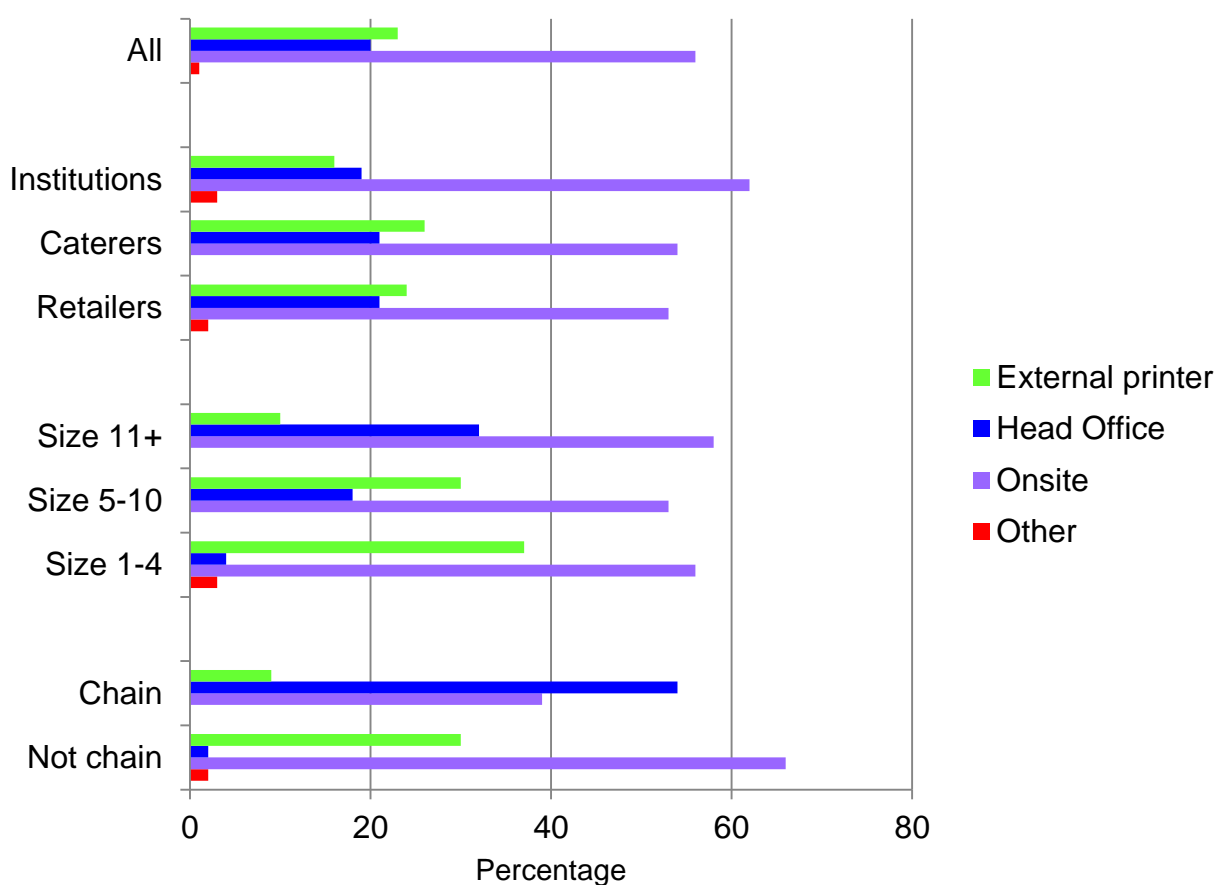
Q:C11. *Do you provide printed menus or other printed information on food allergens?*

Note: \* denotes a statistically significant difference to all other groups in the category.

Statistically significant differences between just some groups within the category are denoted with lower case letters

Among businesses which provided printed information, a little over half (56%) produced their printed materials using in-house equipment (Chart 6.9). 20% received their printed materials from Head Office and 23% relied on external printers. The use of external printers was most common among caterers and retailers (26% and 24% compared with 16% of institutions), in non-chains (30%, compared with 9% of chains) and among small businesses with fewer than 5 staff (37%, in contrast with 10% of businesses employing 11 or more staff).

**Chart 6.9: Source of printing among food businesses which provide printed menus or other printed information on food allergens**



Base: 613 businesses which provide printed menus or other printed information on food allergens

Q:C12. *Who prints this material?* Multiple response option

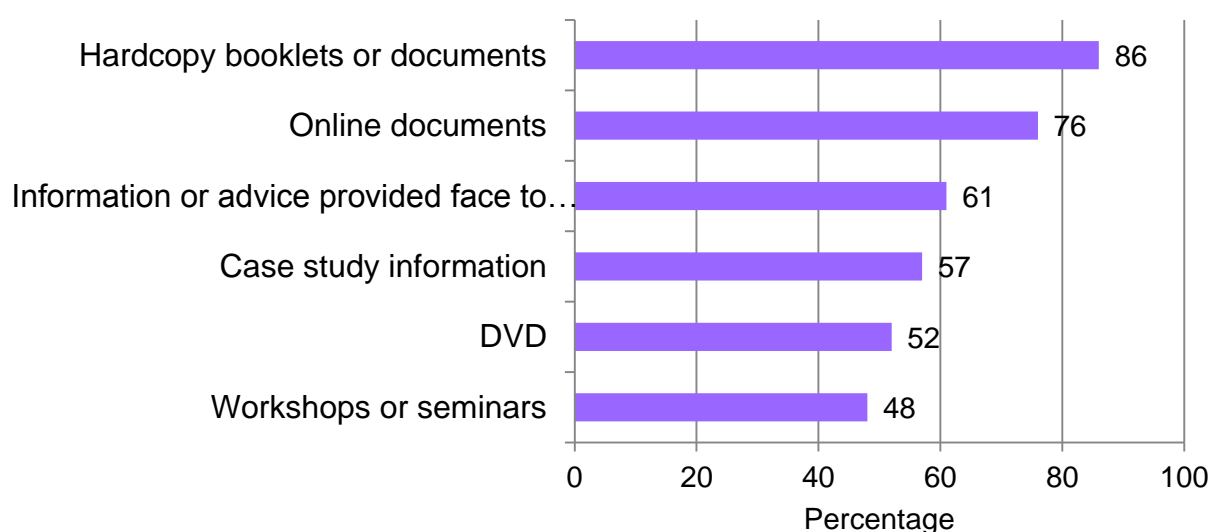
## 6.4 Type and source of information that would help food businesses

One aim of the study was to assess the support food businesses may require to comply with the new regulations and how the FSA can best assist food businesses to move forward.

Chart 6.10 shows the type and format of information that businesses would favour in assisting them to implement any necessary changes (multiple choices were permissible). The most widely preferred source of information is hard copy booklets or documents – favoured by 86% of food businesses. Also widely cited as helpful is online documentation (76%). 61% of businesses also stated that face to face delivery of information or advice would best meet their needs – consistent with findings from an FSA evidence review on regulation cultures and behaviours (IES, 2010), which indicated that, where possible, businesses prefer prescriptive advice tailored to their own business, preferably delivered face-to-face.

Smaller, but nevertheless fairly large proportions of food businesses also expressed interest in receiving information in the form of case studies (57%); by means of a DVD (52%) or via workshops/seminars (48%).

**Chart 6.10: When introducing changes to comply with the new law – the type of information which would best meet the needs of food businesses**



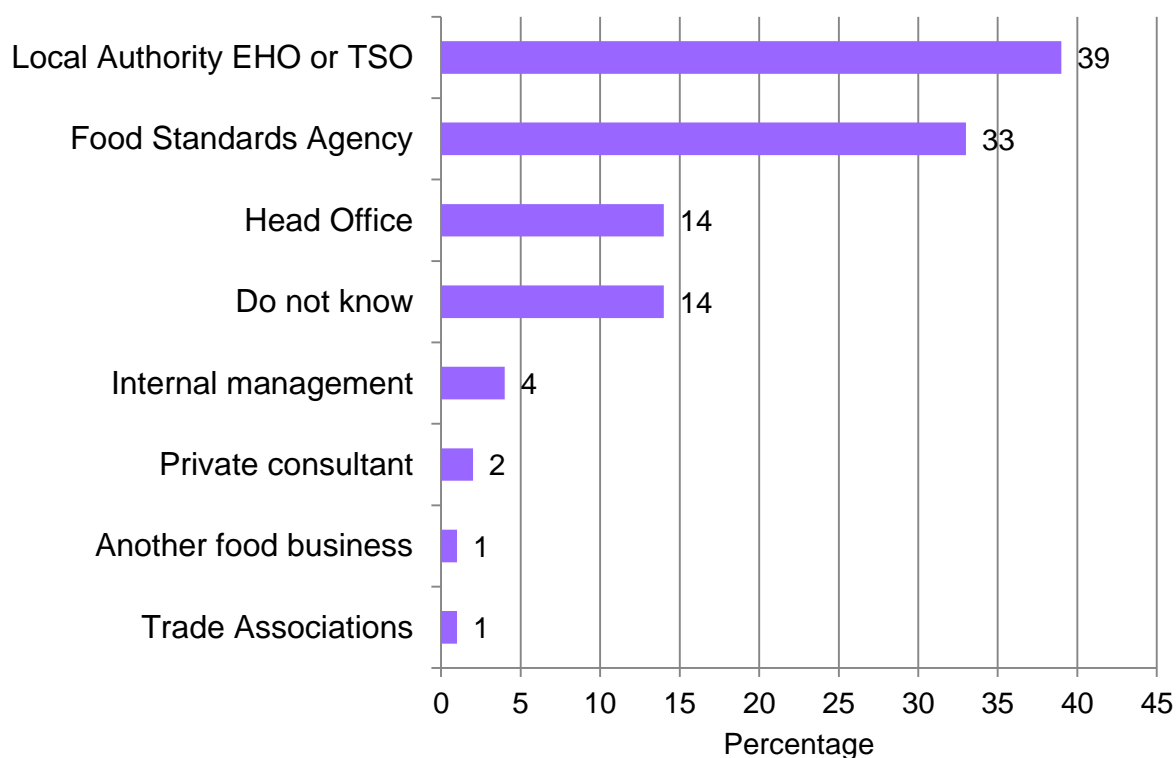
Base: 1666

Q:C5. *Thinking about the changes you will need to introduce, which of the following types of information would best meet your needs?* Multiple response option

The same pattern of responses was evident among all food business types and across all four countries, with hardcopy the most favoured and workshops the least. Although sample sizes were small, the preferences of food business with an owner/manager whose first language was not English (sample size of 135) were explored. Once again the same order of preferences was expressed. However, whereas 51% of English speaking managers stated a DVD would be helpful, this figure rose to 63% when English was not the first language of the owner/manager.

Businesses have access to a range of bodies and agencies that can offer support and advice in relation to regulations. The survey asked owners/managers which source of information would best meet their needs. Responses are shown in Chart 6.11. The largest cluster of businesses (39%) favoured receiving information or advice from EHOs or TSOs in their Local Authority. One third (33%) expressed their preference for the FSA as the ideal source of support. Smaller proportions of businesses identified their Head Office (14%), internal management (4%) or a private consultant (2%) as useful sources of information.

**Chart 6.11: When introducing changes to comply with the new law – the sources of information which would best meet the needs of food businesses**



Base: 1666

Q:C6. *Who would you like to provide that information?* Multiple response option

Businesses in different sectors exhibited slightly different preferences in terms of information sources (Table 6.2). While 41% of caterers and institutions identified their LA as a good source of support, a smaller 28% of retailers expressed a preference for their LA with 22% identifying, instead, their Head Office. Similar proportions of businesses in all sectors would like to receive information from the FSA (32%-34%).



**Table 6.2: When introducing changes to comply with the new law – the source of information which would best meet needs by type of food businesses**

	Caterers	Retailers	Institutions
Cell percentages			
Local Authority EHO or TSO	41	28	41
Food Standards Agency	34	32	34
Head Office	10	22	17
Do not know	16	13	10
Internal management	2	1	4
Private consultant	4	2	6
N	956	401	309

Base: 1,666

Q:C6. *Who would you like to provide that information?* Multiple response option.

No statistically significant differences were observed between the 4 countries in relation to the type and source of information that would help food businesses to comply.

Table 6.3 shows which information sources are preferred according to business size and whether a chain. Owner/managers with 11 or more staff were less likely to favour information from their LA (31%) compared with smaller businesses (43-45%). Instead, the larger the business, the more likely Head Office materials were identified as best meeting their needs (4% of businesses with 1-4 staff; 11% of businesses with 5-10 staff and 24% of businesses with 11+ staff). Around one third of all businesses, regardless of size, would like to receive FSA information.

A similar pattern is evident when comparing chains and non chains. Chain businesses were most likely to favour Head Office information (38% compared with 4% in non chains),

while non chains were most likely to prefer LA materials (45% compared with 22% of chains). 37% of non-chains also expressed an interest in receiving information from the FSA compared with 23% of chains.

**Table 6.3: When introducing changes to comply with the new law – the source of information which would best meet needs by type of food businesses**

	1-4	5-10	11+	Chain	Non chain
Cell percentages					
Local Authority EHO or TSO	45	43	31	22	45
Food Standards Agency	34	32	34	23	37
Head Office	4	11	24	38	4
Do not know	17	16	10	14	14
Internal management	1	1	4	3	2
Private consultant	3	3	6	5	4
N	586	452	613	479	1184

Base: 1,666.

Q:C6. *Who would you like to provide that information?* Multiple response option.

### **Follow-up findings – Type of support which would best meet needs of implementing changes**

Follow up research confirmed interest in, and demand for, a range of means of support. However, what was most important to food businesses was the content of the support rather than the format of the support. It was critical for businesses to have clear information on what will be expected of them and prescriptive guidelines instructing them what to do in order to fulfil their obligations. As mentioned previously, it was also key to the food businesses we spoke to that they received information in a timely manner, in order to give them sufficient time to act in accordance with the legislation.

*'It being timely is important, so that it's in good time and doesn't have to be done in a week.'*

(Owner, Delicatessen, 5-10 staff)

There was a feeling among some of the businesses we spoke to that certain aspects of the legislation will not apply to them. Therefore, the more sector-specific the information provided, the more advantageous it will be to getting businesses to recognise what they need to do in order to comply.

*'I would just like clear and precise information from the FSA. It would be useful to get a pack – to outline exactly what was required.'*

(Owner, Delicatessen, 5-10 staff)

Again, in accord with the quantitative survey, there was no overall consensus on who should provide this information, but there was a feeling that as the legislation is coming from the FSA that it should be them who provides it. Some also felt that actual distribution of the information should be through Environmental Health Offices to ensure consistency of the message, given they are ones who typically have the contact with businesses.

## **7 Market Stalls**

In addition to the main baseline survey of food businesses, further interviews were completed with stalls and mobile food outlets at nine different markets across in London, South East, Midlands and the North. Due to resource constraints market stall interviews were limited just these four English regions. A total of 56 interviews were conducted with market traders; 51 market stall holders and 5 mobile food vans. This chapter reports the findings from these market stall holders and mobile food vans.

Please note that findings from this section, even those reporting at the overall level - across all 56 interviews - should be treated with extreme caution given the small bases sizes involved. These findings should not be considered representative of all market traders and are indicative only of the practices of the traders interviewed specifically as part of this research.

For reporting purposes, the term 'market traders' will be used in relation to market stalls and mobile vans collectively. Given the limited population data available these survey findings have not been weighted and as such no direct comparisons with the main survey findings are drawn.

## Summary

- **Policy**
  - 57% of market stall traders had a written or informal policy on the provision of allergen information. In 32% of cases this policy was informal, in 25% formal.
  
- **Allergens information**
  - 95% of market stall traders provided information on allergens to their customers orally or in writing
  - 68% used both oral and written information
  - 21% used only oral information
  - 5% used only written information
  - Only 3 market traders that provided no information to customers.
  
- **Business processes and staff training**
  - 54% of market traders had read documentation or guidance on food allergen labeling.
  - 32% had received formal training on food allergens.
  - Only 25% of market traders were aware of the Food Standards Agency's voluntary code of good practice in relation to allergen labeling. The majority (71%) of those who were aware of the guidance had read at least some of it (with 21% having read all of it).
  - Nine of the ten market traders who had read at least some of the guidance found it easy to understand leaving one trader who found it difficult due to some aspects of it being unclear/ ambiguous.
  
- **Allergen information provided for staff**
  - 70% of market traders provided oral training on allergens to their staff and 70% 'formal' training.
  - 16% had no staff training.

## **Allergen information policies**

Just over half the market traders (57%), had a written or informal policy on the provision of allergen information (in 32% of cases this policy was informal, in 25% formal). These findings were consistent by region and size of market stall.

## **Provision of information on 14 allergenic ingredients**

The vast majority of market stall traders (95%) provided information on allergens to their customers. Information was most commonly provided in relation to nuts and peanuts when the food/meals contained this allergen (82%). Information on sesame seeds was also commonly available (71%) as was information on soybeans and celery when the food/meals contained the ingredient (88% and 70% respectively, although low base sizes of 8 and 10 should be noted).

When asked why information was provided on some allergens and not others, the most common reason, given by more than one-third of market traders (37%), was that they tended to focus on the more common allergens. One in six reported that they did not focus on allergens that customers do not enquire about and the same proportion said that they did not know why information was provided on all allergens (17% respectively).

## **Methods used to inform customers**

When asked about methods used to inform customers about the presence of allergenic ingredients, the vast majority of market stall traders (95%) said that they provided information orally or in writing, leaving only 3 market traders that provided no information to customers. Two thirds of market traders (68%) used both oral and written information to inform customers, whilst one fifth used only oral information (21%) and a smaller proportion used only written information (5%) to inform customers.

The three market stalls that did not provide any information said this was because 'there was no need ' or that 'it was not a requirement to do so'.

The most common form of written communication used was allergen labelling, either on the product or adjacent to the product (43%). One third reported that information was written on menus (34%); one quarter used posters (27%) or packaging that was prepared

in-house (25%) whilst one in five (20%) provided information on booklets or leaflets which were available to the customer on request.

The market traders who provided information confirmed using the same methods regardless of food type.

### **‘May contain’ type labelling**

‘May contain’ type labelling was used by one-quarter of market stalls (12 in total) but not at all by vans. This type of labelling was used by half the stalls for eggs and for milk, whilst it was used for peanuts, other nuts, sesame seeds and soybeans by 4-5 stalls respectively.

### **‘Free from’ labelling**

‘Free from’ labelling was used by one in eight market stalls (8 in total) but not at all by vans. Gluten was, by far, the most common cited allergen for which ‘free from’ labelling was used (this was mentioned by 7 out of the 8 stalls that used ‘free from’ labelling).

### **Checking allergen ingredients- how ingredient information is recorded and stored**

When asked what methods staff use to check for the presence of allergenic ingredients, a third of market traders (36%) reported retaining information from their suppliers to which they referred when needed. A quarter (25%) retained ingredient information for all products used in the preparation of food; whilst one in eight said that they were already aware of the ingredients (14%) or they check with the chef (14%).

Half the market providers reported ‘always’ checking or auditing ingredients from their suppliers (50%), whilst one in eight reported doing so ‘sometimes’ (14%); leaving one third who ‘never’ checked (36%).

## **Business processes and staff training**

Over half of the market traders surveyed had read documentation or guidance on food allergen labelling (54%). This incidence did not differ by stall type or location.

Fewer market traders had received formal training on food allergens (32%).

The most common cited sources used for documentation and guidance on food allergens was the internet (27%) and training courses (23%), followed by the Local Authority (17%). One in ten cited the Food Standards Agency and/or another food business (10% respectively).

Where formal training had been provided, this was done so more often by a private consultant (33%), a college or education institute (28%) and/or an employer (22%) than the local authority (11%) or the Food Standards Agency (6%).

Market traders were asked whether they were aware of the Food Standards Agency's voluntary best practice guidance in relation to allergen labelling. Only one-quarter were aware of it (25%) which included no mobile vans. The majority (71%) of those who were aware of the guidance had read at least some of it (with 21% having read all of it).

Nine of the ten market traders who had read at least some of the guidance found it easy to understand leaving one trader who found it difficult due to some aspects of it being unclear/ ambiguous.

## **Allergen information provided for staff**

The majority of market traders provide training on allergens to their staff; 70% provide oral training and 70% 'formal' training. Only nine market traders (16%) reported having no staff training, not even in the form of leaflets or posters around the stall.

Training also exists among market traders in other forms, the most common of which were staff handbooks on business procedures (45% of all market traders). One in five provided



staff with booklets on allergy control (21%); the FSA voluntary document best practice guidance (20%) and/or posters around the stall (20%).

### **Formal systems to avoid cross contamination**

The findings show that two thirds of market traders (61%) have formal systems in place to prevent cross contamination of food allergens. The most common system cited was separate work areas (53%), followed by separate chopping boards and utensils (41%).

### **Awareness of the new law, the need for change in practices and preferred type of help.**

Awareness of the new EU legislation was low with just 20% of market traders (i.e. 11 traders) describing themselves as aware. Those who were more aware of the new law were also more likely to provide formal training to their staff. Spreading awareness therefore may be key to increasing levels of staff training.

### **Challenges**

Of the 11 market traders who were aware of the new EU regulations, 7 thought that it would be 'very easy' or 'easy' to comply, 3 were unsure and only 1 market trader foresaw it to be 'difficult' (no-one thought it would be 'very difficult'). The trader who thought it would be difficult believed that his main challenge would be logging and record keeping of allergy information. The 7 market traders who considered it would be easy to comply already provided information to their customers about allergens.

These 11 market traders were then asked what changes they would need to introduce in order to comply with the new law. Ten traders believed they would have to provide more training to staff on allergen guidance, and increase provision of allergy information on a wider range of food than currently provided. Nine traders (still the majority of those aware) said that they would need to change how they record ingredients used or purchased or increase provision of allergy information on a wider range of allergens than currently provided.

## **Type and source of information that would help food businesses**

All 56 market traders were asked which types of documents would best meet their needs to help them make any necessary changes to comply with the new law. The source of information most preferred was online documentation and guidance (89%), followed by hard copy booklets of documents (80%). Three quarters wanted information or advice to be provided face to face, whilst around two thirds wanted case study information (68%), workshops or seminars (63%) and/or a DVD (61%).

Market traders were asked what source of information would best meet their needs when introducing changes to comply with the new law. Almost half (46%) would prefer the Trading Standards Officer or Environmental Officer in their Local Authority to provide the information, whilst almost two fifths (38%) stated a preference for the Food Standards Agency. One in seven market traders (14%) were not sure who they would prefer to provide that type of information.

## **Specific challenges- regularity of changing menus/range of products sold and updating information**

A potential difficulty for food business, including market stalls, when the new regulations come in is the anticipated cost and time associated with updating their menus or other sources of information to comply with the new law. The survey revealed that for half the market traders (52%), the products they sell 'never' change or change no more frequently than twice a year. Around one in eight change their products between 2-5 months (16%) whilst a quarter (27%) change their menu at least monthly (including some who change it daily).

It is this latter group (who change their products at least monthly) who could find the new legislation the most demanding on their time and efforts in terms of regularly updating their information. However, of those who do update their products at least sometimes, the majority (70% of all market traders) update their written labels or menus with respect to allergy information as they change the product and so may not find the changes in law impose too much of a change on their current practices.

## 8 Conclusions and Recommendations

The baseline study on the provision of allergy information to consumers in relation to foods sold loose underpins the Agency's strategic objective of ensuring consumers have the information they need to make informed choices about where and what they eat. The survey provides key evidence for FSA in preventing allergic reactions to food eaten out of the home. Findings from the study on current practices in relation to whether and how food allergen information is conveyed to consumers and perceived obstacles to complying with the new EU law<sup>11</sup> will assist the Agency in providing targeted support for food businesses.

In this chapter, we highlight some of the key messages and implications which have emerged from the study. The chapter is structured to reflect the primary and secondary aims of the study.

### 8.1 Providing Information for Consumers

#### Information provision on 14 food allergens

The provisions laid out under the EU Food Information for Consumers Regulation (EU FIC) (No. 1169/2011) will apply from December 2014. Currently, in 2013, information provision varied greatly according to the allergen, ranging (among businesses selling the ingredients) from 80% of businesses providing information in relation to nuts to around half or fewer businesses in relation to soybeans, lupin, mustard, celery and sulphur dioxide. Clearly widespread change is needed, therefore, before food businesses achieve compliance with the new allergen information regulations. While information on nuts and gluten is most prevalent, there remains considerable scope for progress in relation to all 14 allergens.

Systematic differences in the probability of providing information on the 14 food allergens when comparing businesses of different size, were not evident. Retailers were significantly more likely than caterers and institutions to provide information on some food allergens

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<sup>11</sup> Food Information for Consumers Regulation 1169/2011

(cereals containing gluten, sesame seeds, mustard and celery) but not all. Within the catering sector restaurants were the most likely to provide information on each of the 14 food allergens while takeaways, cafes/sandwich shops and hotels in particular were among the least likely. A case could therefore be made for targeting the latter three when promoting compliance.

Local Authorities and/or the FSA may need to invest resources in promoting awareness of the full range of food allergens among food businesses in order to effect full compliance as a lack of familiarity with allergens was among the reasons for not providing comprehensive information. However, the two most common reasons given for not providing information on all 14 food allergens was that there was no customer demand and that the businesses focussed on the more common allergens – these reasons do not suggest significant obstacles to full compliance.

### **Methods used to inform consumers**

One fifth of businesses only provided information on food allergens orally. This practice may be compliant with the new legal requirements, but evidence from previous studies have highlighted that the oral approach is not favoured by all consumers as many are embarrassed to draw attention to their allergies in public. For these individuals, access to written information is therefore important and more socially comfortable. Best practice guidance might therefore steer businesses, where appropriate, to combined information provision approaches – both written and oral. The availability of oral information is important given that written information is not always up to date. Whether the balance between oral, written and combined approaches is optimal depends on the regulatory direction taken by the FSA in response to the new EU law and whether there is a perceived need to extend the provision of written information.

The current FSA best practice guidance does acknowledge that some customers feel awkward discussing their food allergy and recommends that businesses use posters, or a statement put on the menu, letting customers know that the establishment is happy to help with food allergy requests.

Best practice examples would also benefit those businesses interviewed at the follow up stage which felt that providing information in writing was not practical given the space that would be required on menus. Different approaches could be highlighted, demonstrating how other businesses have responded to the 'space' challenge.

## **Storing information**

In order to respond accurately to requests for food allergen information, food businesses need to maintain records of the ingredients contained in the loose food they sell. Some businesses did not record information from suppliers about allergenic ingredients because the supplier did not provide them with any information. Guidance along the full supply chain is therefore advisable to ensure that the correct information is available to consumers.

Some food businesses that did not have formal structures in place with regards to recording, storing and updating of food allergen information, stated that they retained all necessary information in their head. These tended to be bakeries and smaller caterers – sandwich shops, restaurants and takeaways. There remains a risk in these instances that recall error could arise.

## **Substantiation of ingredients**

Whether food businesses substantiate ingredients from suppliers was also a focus of the study. In order to provide consumers with the information they need, food businesses need to be confident they know what ingredients are in the food not prepacked food they sell. Overall, half of all food businesses surveyed 'always' checked or audited ingredients from their suppliers or wholesalers; 21% sometimes checked; and 27% never checked. Reasons for not checking, investigated at the follow up stage, included: trusting their suppliers due to established relationships; not having the resources to verify suppliers' information; and not regarding substantiation as an issue of concern as a consequence of never having experienced mislabelling or adulteration of food in relation to allergen ingredients. No clear policy implications arise from these findings.

## **8.2 Awareness of food allergen issues and the new law**

60% of business owners/managers had either read documentation or attended a training session in relation to food allergens in a business context. In terms of dissemination of food allergen information by the FSA and/or LAs this is a good baseline but leaves a further 40% of businesses which may not have the level of expertise required to adequately manage and control allergy related risks in their workplaces. Given the need to inform businesses of the new EU law, this could be an opportunity to broaden awareness

in general, and to encourage more food business owners/managers to read allergen information guidance or attend training sessions.

With specific reference to the FSA's voluntary best practice guidance - 39% of food businesses were aware of the document. Levels of awareness were similar across businesses regardless of sector or size, although chains were more aware than non chains and awareness was significantly higher in Scotland than in England or Wales.

Promoting more widespread familiarity with the FSA guidance might be recommended on the grounds that awareness was associated with a significantly higher probability of providing information on each of the 14 food allergens compared with businesses which were not aware.

### **Staff training**

It is important to ensure that frontline and kitchen staff know how to handle requests for food allergen information from consumers and adhere to practices designed to prevent cross contamination. Good practice in this regard would appear to be widespread as the majority (78%) of food businesses provided allergen training for their new staff. Food businesses also reported use of a range of written materials including the FSA voluntary best practice guidance, booklets on allergy control, information leaflets, easy access posters on their walls, and in staff handbooks. The FSA and other agencies can therefore support businesses to meet the new requirements by ensuring an updated and ready supply of materials in this broad range of formats.

### **Awareness of the new law**

A widespread campaign promoting awareness of regulatory change would seem to be necessary, as awareness was fairly low at just one fifth (19%) of businesses.

Rates of awareness differed within the catering business sector – from a low of 14% in sandwich shops to a high of 25-26% in pubs and restaurants. Differences within other sub-sectors were not wide or were not statistically significant. There were geographical differences, however. Awareness was highest in Scotland at 30% and lowest in Wales at 14% compared with 17% in England and 22% in Northern Ireland. Publicity to promote awareness of the new EU law is therefore needed across the UK, most acutely within Wales.

## **8.3 Challenges to compliance and support needs**

### **Anticipated changes and challenges**

There was fairly widespread acknowledgement that quite a range of changes would be needed to comply with the new law. 90% of businesses aware of the new law acknowledged that they would need to make at least one of the following changes: request more information from contractors; provide more staff training; provide information on a wider range of allergens and a wider range of meals/products; and be more stringent in record keeping. 33% of food businesses indicated they would need to introduce all the listed changes.

Having discussed these various changes, food businesses were asked how difficult it would be to implement them. Most businesses surveyed anticipated that introducing changes to become compliant would not be particularly challenging but 17% of businesses perceived the changes as potentially difficult (i.e. scoring 1 or 2 on a scale of 1-5, where 1 is 'very difficult' and 5 is 'very easy'). This 17% of food businesses were asked what would be their main challenges, the most common responses were: 'checking ingredients from suppliers' (38%); 'time it will take to update menus or labels' (28%); 'logging and record keeping of food allergen information' (24%); the cost of regularly updating information (19%); and remembering to update information (10%).

At the follow up stage, some businesses that relied heavily on printed menus and fixed signage saw the changes to labelling and information provision as a particular challenge.

In order to help businesses overcome these challenges the survey and follow-up interviews asked business owners/managers about the format and source of information and support that would best meet their needs – discussed in the following sub-section.

### **Support Needs**

When considering the changes that would need to be introduced to comply with the new law, surveyed food businesses indicated that information in the following formats would best meet their needs (multiple choices were permitted): hard copy booklets or documents – favoured by 86% of food businesses; online documentation (76%); and face to face delivery of information or advice (61%). Smaller, but nevertheless fairly large proportions

of food businesses also expressed interest in receiving information in the form of case studies (57%); by means of a DVD (52%) or via workshops/seminars (48%).

The importance of readily available information and advice as a major influence on compliance, particularly in the context of changing regulations, was also highlighted by an earlier FSA study investigating regulation cultures and behaviours (IES, 2010).

Most food businesses wished information to be provided by either their LA, the FSA or, among chains, their Head Office. Only 1% of businesses spontaneously suggested a trade organisation would be a preferred source of information.

It was emphasised by some businesses at the follow up stage that the ease of implementing the new changes would be dependent on having adequate time to plan and prepare. In addition, the need for clear information which sets out exactly what this will mean for certain types of business was voiced. If information is provided in a clear and timely manner, therefore, the findings suggest that most businesses should be able to take the need for change in their stride. It should be noted, however, that at this stage, a full appreciation of the potential scope and scale of necessary change was lacking.

Providing suitable information is critical given previous research which suggests that regulations in general are among the obstacles to success most often cited by businesses (IFF, 2011). Challenges can be exacerbated by a lack of information about regulatory requirements and how to meet them or by information delivered in a manner that is hard to understand. These challenges can fall disproportionately on the SME sector as noted in HM Treasury (2002). Measures can, however, be introduced to offset the regulatory burden impacting on food businesses. Effective, well targeted communication strategies and advice or support services, for example, can help businesses meet their compliance obligations and adhere to good practice. More effective communication may also overcome overestimated perceptions of how difficult it is to meet regulatory requirements which may be less difficult to comply with than believed.

## **8.4 May contain and free from information**



The new regulations do not require information to be provided on the presence of the 14 allergens as a result of potential cross contamination, i.e. 'may contain' information, nor does it regulate 'free-from' labelling. These information practices were, however, explored by the study as a secondary aim.

### **May contain**

The survey established that 29% of businesses used 'may contain' information. It has been suggested that 'may contain' labels have been devalued from overuse (FSA, 2002). Current FSA guidance draws attention to cross contamination risks and the need to be aware of 'may contain' labels on products from suppliers but does not discuss the benefits to consumers of minimising 'may contain' warnings where possible.

One particular concern is the need to ensure businesses do not use 'may contain' labelling as an *alternative* to accurate ingredient lists given that previous studies have found that allergic customers do routinely eat products with 'may contain' warnings – using various rules of thumb to guide the interpretation of 'may contain' labels (FSA, 2002).

### **Free from**

With only 13% of businesses using 'free from' labels, there would seem to be scope to encourage the wider adoption of such guarantees given that they are favoured among consumers with allergies. A previous FSA study has highlighted the value for nut allergic consumers in increased availability of 'free from' foods (FSA, 2009). The FSA current best practice guidance does not provide advice for businesses in this regard and this might be an area of guidance to develop.

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## Appendix 1:

### Examples of booklets/leaflets containing allergen information

**Roasted Portobello Mushroom & Halloumi Cheese Pitta**

**Ingredients:**  
 Portobello Mushroom, Halloumi Cheese Slices (see Extras & Garnish), Basting sauce (see Marinades & Sauces), Garlic Sauce (see Marinades & Sauces), Chilli Jam (see Extras & Garnish), Nando's Mayonnaise (see Extras & Garnish), Pitta Bread (see Extras & Garnish), Tomato salad mix (Cos, Julienne Carrot, Fine Endive, Red Cabbage, White Cabbage, Coriander), Tomato slice.

**Dietary Information:**

	YES	NO	Comments
<b>Contains:</b>			
Nuts & derivatives		✓	Nando's Mayonnaise contains egg
Fish & derivatives	✓	✓	
Eggs & derivatives		✓	Halloumi Cheese contains milk
Crustaceans		✓	The Pitta Bread contains soya
Molluscs	✓		
Milk & derivatives	✓	✓	Nando's Mayonnaise contains mustard
Soya & derivatives	✓	✓	The Pitta Bread contains gluten from wheat
Celery	✓	✓	
Mustard		✓	
Lupin	✓	✓	
Sesame seeds		✓	
Gluten		✓	
Sulphur dioxide (> 10 mg/kg)		✓	
Monosodium glutamate		✓	
Irradiated foodstuff		✓	
Old muster	✓	✓	Nando's Mayonnaise contains egg
Not suitable for Vegetarians		✓	
Not suitable for Vegans		✓	
Not suitable for Celiacs		✓	

ASK Allergens - by Menu Item														
Menu Item	Does it contain?										Are these items suitable for?			
	MEB, Lactose, Dairy	Fish, Shellfish, Molluscs	Onions	Egg	Soya	Soya	Mushrooms	Tonatsina	Alcohol & Alcohol Derivatives & Vinegars	MSG or MFD	Vegetarian	Vegan	Custards	Gluten-free
Torta Italiana (497 kcal)	Yes, from cake and gelato	No	Yes, from cake	Yes, from cake	Yes, almonds and chocolate in cake	No	No	No	No	No	Yes	No	No	None
Torta al Limone (288 kcal)	Yes, from fat and cream	No	Yes, from fat	Yes, from fat	No	No	No	No	No	No	Yes	Yes	No	None
Profiteroles w/ Cioccolato (384 kcal)	Yes, from sauce and profiteroles	No	Yes, from profiteroles	Yes, from profiteroles	No	Yes, from sauce	No	No	No	No	Yes	No	No	None
Tiramisu (460 kcal)	Yes	No	Yes	Yes	No	No	No	No	Yes, alcohol	No	Yes	No	No	None
Honeycomb Cheesecake (322 kcal)	Yes	No	Yes	No	No	Yes	No	No	Yes, alcohol	No	Yes	No	No	None
Apple Rustica (521 kcal)	Yes, from rustica and gelato	No	Yes, in rustica	Yes, in rustica	Yes, almond powder in rustica	No	No	No	No	No	Yes	No	No	None
Chocolate Nemesi Fondant (585 kcal)	Yes, from nemesi and gelato	No	Yes, nemesi	Yes, nemesi	No	Yes, nemesi	No	No	No	No	Yes	No	No	None
Gelato Con Frutta (168 kcal)	Yes, from gelato	No	No	No	Yes, almonds	No	No	No	Yes, almonds	No	Yes	No	Yes	None
Gelato Espresso E Biscotti (241 kcal)	Yes, from gelato	No	No	Yes, from biscuits	No	No	No	No	Yes, almonds	No	Yes	No	Yes	None
2 Scoops Cioccolato & hazelnuts (296 kcal)	Yes	No	No	No	Yes, hazelnuts	No	No	No	No	No	No	Yes	No	Yes
Scoops Nocciola & hazelnuts (354 kcal)	Yes	No	No	No	Yes, hazelnuts	No	No	No	No	No	No	Yes	No	Yes
Scoops Espresso coffee bean (333 kcal)	Yes	No	No	No	No	Yes, from coffee bean	No	No	No	No	No	No	No	Yes

AMERICANO  
ESPRESSO  
MACCHIATO

single 1.80 double 2.05  
single 1.80 double 2.05

All of our coffees are available as decaf.

HOT CHOCOLATE

2.25  
2.50

Italy is our inspiration for these new and improved dishes and we're really proud of them.