

Allergens & Labelling



In collaboration with



Thursday 25 June 2026

5 + 1 Low Cost CPD for Environmental Health

Devonshire Place, Leicester, LE2 0RA



Janet Catley-Young
Service Manager
Ashfield District Council

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Why Allergens are Increasing



Clare Bristow - Sadie Bristow Foundation



What to look for when auditing and validation



Caroline Benjamin – Food Allergy Aware



Caroline Benjamin - MIH, MSOFHT
Founder
Food Allergy Aware

e: Consultancy@fatc.co.uk | t: 07732637292 | LinkedIn - <https://www.linkedin.com/in/caroline-benjamin64/>

Best Practice Allergen Audit Guidance

In collaboration with Chesterfield Borough Council



Caroline Benjamin

Thursday 25 June 2026





CHESTERFIELD
BOROUGH COUNCIL

Food
Allergy Aware

Chesterfield Borough Council Food Allergen Project

***Do you provide a service where an officer could carry out
allergy inspections / audits of a business ?***

May 2024

Challenge - Allegan Audits



- Food Inspections cover a wide range of issues and sometimes the food business operator can switch off when the officer starts to discuss allergens. It can be hard enough sometimes to get the basics such as hot and cold running water, soap and drying facilities, sanitiser, temperature checks etc and then expect them to allergens and know what they need to do.

So

- In 2024 Food Allergy Aware were contracted to carry out allergen audits at a separate time pre-arranged.
- 16 businesses were selected, a range of good and bad and different food types, e.g. Indian, Chinese, café, sandwich shop.

Allegan Audits – Challenges

- Food Inspections cover a wide range of issues and sometimes the food business operator can switch off when the officer starts to discuss allergens. It can be hard enough sometimes to get the basics such as hot and cold running water, soap and drying facilities, sanitiser, temperature checks etc and then expect them to understand allergens and know what they need to do.

So

- In 2024 Food Allergy Aware were contracted to carry out allergen audits at a separate time pre-arranged.
- 16 businesses were selected, a range of good and bad and different food types, e.g. Indian, Chinese, café, sandwich shop, Deli's, butchers & bakers.

The Process

- Business booked own slot – this went well
- 15 were visited out of 16 – 1 cancellation
- Set of 40 questions were developed
- Each visit around 2hrs – Allergens only
- Thorough Report completed by Food Allergy Aware for CBC
- Photos also taken
- Reports sent to businesses by CBC



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Report

Contact Information

Chinese Takeaway 14 Oct 2024	Complete
Conducted on	14.10.2024 11:00 BST
Inspected by	Caroline Benjamin & Sally Trice
Name of premises	Chinese Takeaway
Contact name FBO	
Email address	
Contact number	07801230951
Address of premises	CHESTERFIELD S41
Type of food prepared	Extensive Chinese Takeaway Menu
Current LA FHRS	3

Staff Training & Customer information

3 flagged

Is there an allergen policy in place independent or part of FSMS? Non-Satisfactory

Suggested allergen sign CB text see actions point notes

Due to size and nature of our business if you have an allergy to gluten, crustaceans, molluscs, soya, tree nuts (cashews), egg and peanuts we would not be able to serve you

We use soya oil to cook majority of the food and our fryers cook a variety of foods containing the above allergens

Please ask us if you need additional information

Review sign on paper menu remove garlic and cooking wine update to add allergens above

What allergens from #14 are on site

Gluten (Wheat/Barley/Rye/ Oats), Tree Nuts (Almonds, walnuts), Crustacean, Celery, Sesame, Mollusc, Peanuts, Eggs, Soya

What allergen training has taken place with staff

Non-Satisfactory

None, only part L2 food safety



Photo 1

Is there an up-to-date allergen matrix for foods used and prepared on site or SW alternative to access ingredient/allergen information?

Non-Satisfactory

Using food hub list all allergens on web page check sulphites in their products and label appropriately needs reviewing to ensure correct

Is there any "may contains" information on the matrix/ menus if appropriate?

Non-Satisfactory

No, we advised adding MC info to website all allergens on site specifically soya

How is allergen information given to customers takeaway packaging/menus /receipt or website?

Satisfactory

Using food hub which list

Summary -

- Each venue was left at least 3 / 4 action points
 - These need completing prior to their next inspection from 3 months after visit
- Advice was given on the day for any immediate actions



Action Points - examples

No	Action points	Date
1	Recommend allergen labelling on all prepared products in fridges, and freezers (I showed examples amazon and Puracycle) Alternatively laminated signs on front of fridges with clear shelf labelling	Ongoing
2	Owners to complete FSA Food Allergy Training on-line and display the certificates on the wall. CB to source Chinese language via Trading Standards – see 2 Resources notes below	Urgent
3	"May Contain" labelling signage on Chesterfield Food Hub and sign should include soya due to oil used in all cooking here. See 3* below	Urgent
4	Add QR code to sign in shop to food hub website for menu allergen information. This should be prominently displayed	Urgent
5	Review paper menu and the allergen numbers listed, they do not all correspond with the key. Make sure you know exactly which allergens are in the dishes you prepare and number them accordingly. Change the allergy advice message on the menu to remove garlic and cooking wine.	

No	Action points	Date
1	Prepare allergy matrix for all items on the menu (FSA) FSA chart word https://www.food.gov.uk/sites/default/files/media/document/allergen-chart.docx	URGENT
	Download 14 allergen sign https://www.tradingstandards.gov.uk/media/ma/gca/local-authority-areas/food-allergen-resources/handouts/english.pdf Page 3	URGENT
	Temperature probe wipes and regular probe calibration record – check SFBB download https://www.food.gov.uk/sites/default/files/media/document/sfbb-management-02-prove-wipes.pdf	On-going
	https://www.foodstandards.gov.scot/downloads/CookSafe_website_update_-_Records_-_Monthly_probe_thermometer_check_-_February_2016_1.doc	
	Hand washing sign and dedicated paper towels	On-going
	Cleaning schedule daily/weekly and monthly https://www.food.gov.uk/sites/default/files/media/document/cleaning-schedule.pdf	On-going
	Complete FSA online training - https://allergytraining.food.gov.uk/	URGENT

No	Action points	Date
1	All glazes/ rubs and items that are packed on site need full PPDS labelling. Currently it is not happening. Caroline to fwd. alt allergen free manufacturers	URGENT
2	FSA Allergen training for all staff who have not completed any allergen training.	On-going
3	Buffet menus- For all buffets please add all allergen information and add a statement " Please ask us for all allergen information and menu alternatives" Ensure that you have detailed all the foods prepared on site with their allergen content. Add m/c if appropriate- update matrix	URGENT
4	Add a section to your cleaning schedule to cover the preparation of an allergen-free meal. This involves 2-stage cleaning, which you are very aware of.	On-going
5	All items which are uncovered to be placed in sealed containers wherever possible and labelled. Add signage from the resources below for your kitchen area to raise awareness.	On-going

2 -Stage Cleaning

- ✓ Many of the venues had limited knowledge of 2 stage cleaning
- ✓ Allergenic ingredients such as flour, in a small kitchen, were a major concern of cross-contamination.

Advice given to majority of venues

Preparation & Cooking – advice given

- Customers who have an allergy want to know how their food is going to be prepared.
- If they can be reassured that processes are in place to produce a safe meal for them, they are more likely to have confidence in venue and return to the venue.
- Always use clean dedicated equipment for cooking a free-from meal and never mix cooking spoons or utensils as there is a risk of cross-contamination
- Do not use the same fryer for cooking GF food and gluten containing food items as cooking does NOT destroy allergens.



Additional observations



Audit Observations:- Purchase / Suppliers

Favoured brands

- Usually Cash & Carry
- Not always verified

Checked for :-

- Mustard
- Soya
- Milk
- Sesame
- Wheat
- Peanuts
- Celery
- Almonds



Audit Observations:-Storage-ambient



Tikka Paste – Cross contamination risk

Contains Mustard - May Contains Peanuts and Nuts



Audit observations: Storage Fridges/Freezers



Lack of labelling – both contents and dates

Personal foods stored amongst the takeaway foods



Labelling essentials

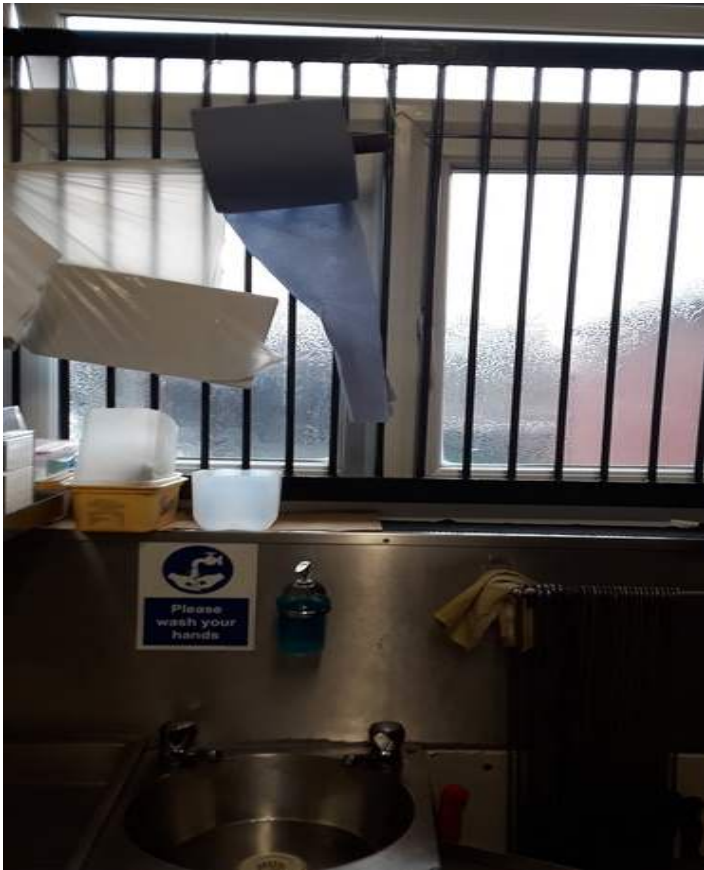
- ❑ Labelling best practice
 - ✓ Key requirement
 - ✓ It is important for both regulators and the food business
- ❑ State basic information such as :
 - ✓ Product
 - ✓ Date prepared/opened
 - ✓ Allergens present
 - ✓ Use by / Best before dates
- ❑ Marker pens to highlight ingredients – include allergens
 - ✓ Retain labels – in folder
 - ✓ Images – photographs to show the customer



www.thenutrientgap.com

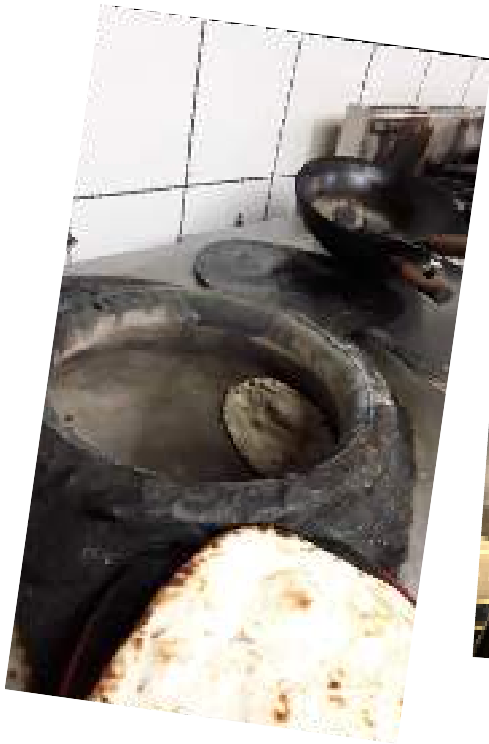
Food
Allergy Aware

Audit Observations:- Preparation





Audit Observations:- Preparation & Cooking



Audit Observations:-

Documentation Allergen information

Provide clear and accurate information about the allergens present in the food and drink you provide

When were they updated? Some were newly created but with errors – double checking was key

Dishes	Cereals	Eggs	Fish	Milk	Nuts	Peanuts	Sesame seeds	Soya	Sulphur Dioxide
momchi	✓								
Samosa									
Hand Fry Crispy									
Hand Fry Fish			✓						
Bhutte									
Chilli Chutney									✓
Chilli Chutney									✓
Chilli Chutney									✓
Chilli Chutney									✓
Chilli Chutney									✓
Chilli Chutney									✓
Chilli Chutney									✓
Chilli Chutney									✓
Chilli Chutney									✓

DISHES	Cereals	Eggs	Fish	Milk	Nuts	Peanuts	Sesame seeds	Soya	Sulphur Dioxide
Tandoori Special	✓	✓	✓	✓	✓				
Panchos	✓	✓	✓	✓	✓				
Vegetarian Special	✓	✓	✓	✓	✓				
Chicken Mullani	✓	✓	✓	✓	✓				

Dishes	Cereals	Eggs	Fish	Milk	Nuts	Peanuts	Sesame seeds	Soya	Sulphur Dioxide
SNE Dishes (Vegetable)	✓								
Bhindi Bhaji									
Bombay Potatoes									✓
Curry Aloo									✓
Gujarati Aloo									✓
Gujarati Bhaji									✓
Mushroom Bhaji									✓
Sagee Aloo									✓
Sagee Aloo (Sagee Bhaji)									✓
Sagee Paneer				✓					✓
Tarka Dal									✓
Mixed Veg Bhaji									✓

Food Safety Issues

- We addressed potential issues of food safety
 - Many takeaways have their own food stored in the venues
 - No labelling
 - Not sealed open containers or carrier bags
 - difficult to identify



Follow up on visits and calls – Feedback



- Training undertaken as suggested
- Up to date matrix available and at hand
- Daily specials board now includes allergen details
- Allergen signage now put up for staff
- Allergen policy developed with step-by-step procedure for dealing with customers
- Contact with suppliers to provide up to date allergen lists on their products
- Staff now ask customers at booking if there is anyone with allergies
- Revised menu with allergens and on website
- Better labelling for products with better containers with lids
- Better cross contamination controls in place
- Now explain to customers due to small kitchen could be a risk
- New separate colour coded utensils
- Better understanding of two stage cleaning

Outstanding matters

- Not all the issues in the report had been fully addressed.
- Things weren't perfect, but there was a noticeable level of improvement
- There was an increased awareness of allergen importance.
- Cleaning schedule **not** updated to do two stage clean which is important if preparing meals for people with allergens.
- Allergen info still **not** on the website

Chesterfield Free Resource Allergen Management System

This pack was produced by Barnsley Metropolitan Borough Council, Food Safety Team, and updated by Chesterfield Borough Council in collaboration with Food Allergy Aware in 2026.




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Allergens and food labelling

 **This section:**
[Food safety](#)

[Food business registration](#)

[Food Hygiene Rating Scheme](#)

[Report a problem with food or a food business](#)

Allergens and food labelling

[Food sampling](#)

[Food alerts](#)

[Health initiatives](#)

[Ban on the sale and supply of single-use plastics](#)

Food businesses in the retail and catering sector are required by law to provide accurate allergen information and manage food allergens safely.

This applies to **all food supplied**, including food that is:

- sold
- provided free of charge
- prepacked
- non-prepacked (loose food)

Food business operators must:

- provide allergen information to the consumers
- handle and manage allergens effectively during all stages of production including storage, preparation and service

The [Food Standards Agency](#) has a guide for providing allergen information and best practice for handling allergens.



Food labelling changes - Natasha's Law

From 1 October 2021, changes to food labelling law for **Prepacked for Direct Sale (PPDS)** foods came into force in England, Wales, and Northern Ireland. These changes, commonly known as Natasha's Law require PPDS foods to be labelling with:

- a full ingredients list
- clear allergen emphasis

Recommended Staff Training



- All staff should be trained **to a minimum** – FSA online or inhouse induction

<https://allergytraining.food.gov.uk/>



- Food Handlers (Level 2–3 allergens, dependent on the role)
- Training updates when there are changes in :
 - Law
 - Processes/equipment
 - Menu



 <p>LEVEL 2 Food Allergen Awareness for Catering</p> <p>Level 2 Food Allergen Awareness for Catering</p> <p>For all food handlers and food service staff working in a foodservice environment.</p> <p>The course covers the basic knowledge needed to identify allergens and understand food allergen risks, communicate safely with customers, and follow procedures to prevent allergen cross-contamination.</p> <p>Learn More</p>	 <p>LEVEL 3 Food Allergen Awareness for Catering</p> <p>Level 3 Food Allergen Management for Catering</p> <p>For managers, head chefs and team leaders, supervisors, and senior staff working in a foodservice environment.</p> <p>This course provides the knowledge and practical tools needed to manage allergen risks effectively, comply with legal requirements, and protect the food safety and health of the customer.</p> <p>Learn More</p>
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Trading Standards Resources

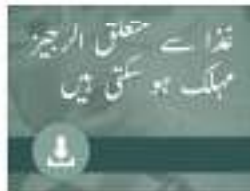


الرجنزیعی الرجی پیدا کرنے والی اشیاء 14

الرجن 14 میں جن 14 شامی اجزاء کے طور پر استعمال کرتے ہوئے قانوناً تشکیل دیتے ہیں، اگرچہ انہیں اجزاء کی فہرست میں اس وقت نہیں لکھا گیا ہے۔ الرجن کو ان سے پہلے کچھ غرابوں کے مثال بھی دئے گئے ہیں جن سے یہ پتہ چل سکتا ہے:

- | | |
|------------------------------|---|
| 1 اجمود | ان میں اجلہ میں اجمود، گندم، چنے، دالیں اور جلی جیسے اجمود، نہ صرف لٹا جاتا ہے بلکہ اجود کی طرح، کھانے کے لئے بھی استعمال کیا جاتا ہے۔ |
| 2 اناج | گندم، چنے، اناج اور دیگر اناج کے اجود، جو کہ اجود کے طور پر استعمال کیے جاتے ہیں، اناج کے طور پر استعمال کیے جاتے ہیں۔ |
| 3 کرستوشنزیعی خول دار | کھانا، کھانا، کھانا اور کھانا کے اجود، جو کہ کھانا کے طور پر استعمال کیے جاتے ہیں، کھانا کے طور پر استعمال کیے جاتے ہیں۔ |
| 4 انڈے | انڈے جیسا کہ انڈے، کھانا، کھانا اور کھانا کے اجود، جو کہ انڈے کے طور پر استعمال کیے جاتے ہیں، انڈے کے طور پر استعمال کیے جاتے ہیں۔ |
| 5 مچھلی | مچھلی، کھانا، کھانا اور کھانا کے اجود، جو کہ مچھلی کے طور پر استعمال کیے جاتے ہیں، مچھلی کے طور پر استعمال کیے جاتے ہیں۔ |
| 6 لوہن | لوہن، کھانا، کھانا اور کھانا کے اجود، جو کہ لوہن کے طور پر استعمال کیے جاتے ہیں، لوہن کے طور پر استعمال کیے جاتے ہیں۔ |
| 7 دودھ | دودھ، کھانا، کھانا اور کھانا کے اجود، جو کہ دودھ کے طور پر استعمال کیے جاتے ہیں، دودھ کے طور پر استعمال کیے جاتے ہیں۔ |
| 8 مولسسکس | مولسسکس، کھانا، کھانا اور کھانا کے اجود، جو کہ مولسسکس کے طور پر استعمال کیے جاتے ہیں، مولسسکس کے طور پر استعمال کیے جاتے ہیں۔ |
| 9 رائی | رائی، کھانا، کھانا اور کھانا کے اجود، جو کہ رائی کے طور پر استعمال کیے جاتے ہیں، رائی کے طور پر استعمال کیے جاتے ہیں۔ |
| 10 میوہ جات | میوہ جات، کھانا، کھانا اور کھانا کے اجود، جو کہ میوہ جات کے طور پر استعمال کیے جاتے ہیں، میوہ جات کے طور پر استعمال کیے جاتے ہیں۔ |
| 11 مونگ پھلیان | مونگ پھلیان، کھانا، کھانا اور کھانا کے اجود، جو کہ مونگ پھلیان کے طور پر استعمال کیے جاتے ہیں، مونگ پھلیان کے طور پر استعمال کیے جاتے ہیں۔ |
| 12 تل کے بیج | تل کے بیج، کھانا، کھانا اور کھانا کے اجود، جو کہ تل کے بیج کے طور پر استعمال کیے جاتے ہیں، تل کے بیج کے طور پر استعمال کیے جاتے ہیں۔ |
| 13 سویا | سویا، کھانا، کھانا اور کھانا کے اجود، جو کہ سویا کے طور پر استعمال کیے جاتے ہیں، سویا کے طور پر استعمال کیے جاتے ہیں۔ |
| 14 سلفر آکسائیڈ | سلفر آکسائیڈ، کھانا، کھانا اور کھانا کے اجود، جو کہ سلفر آکسائیڈ کے طور پر استعمال کیے جاتے ہیں، سلفر آکسائیڈ کے طور پر استعمال کیے جاتے ہیں۔ |

Urdu



Urdu

> Read more ...



English

> Read more ...



Bengali

> Read more ...



Punjabi

> Read more ...

14 Allergens

There are 14 allergens which must be declared by law when used as ingredients. The following list tells you what these allergens are and provides some examples of foods where they may be found:

- | | |
|------------------------------------|--|
| 1 Celery | This includes celery stalks, leaves, seeds and the root called celeriac. You can find celery in celery salt, salads, some meat products, soups and stock cubes. |
| 2 Cereals containing gluten | Wheat (such as spelt and Khorasan wheat/kamut), rye, barley and oats is often found in foods containing flour, such as some types of baking powder, sauce, breadcrumbs, bread, cereals, couscous, meat products, pasta, pastry, sauces, soups and fried foods which are dusted with flour. |
| 3 Crustaceans | Crabs, lobsters, prawns and scallops are crustaceans. Shrimp paste, often used in Thai and south-east Asian curries or salads, is an ingredient to look out for. |
| 4 Eggs | Eggs are often found in cakes, some meat products, mayonnaise, mousses, pasta, ice-cream, sauces and pastries or foods brushed or glazed with egg. |
| 5 Fish | You will find this in some fish sauces, pizzas, relishes, salad dressings, stock cubes and Worcestershire sauce. |
| 6 Lupin | Yes, lupin is a flower, but it's also found in flour! Lupin flour and seeds can be used in some types of bread, pastries and even in pasta. |
| 7 Milk | Milk is a common ingredient in butter, cheese, cream, milk powders and yoghurt. It can also be found in foods brushed or glazed with milk, and in powdered soups and sauces. |
| 8 Molluscs | These include mussels, land snails, squid and whelks, but can also be commonly found in oyster sauce or as an ingredient in fish stews. |
| 9 Mustard | Liquid mustard, mustard powder and mustard seeds fall into this category. This ingredient can also be found in breads, curries, marinades, meat products, salad dressings, sauces and soups. |
| 10 Nuts | Not to be mistaken with peanuts (which are actually a legume and grow underground), this ingredient refers to nuts which grow on trees, like cashew nuts, almonds and hazelnuts. You can find nuts in breads, biscuits, crackers, desserts, nut powders (often used in Asian curries), stir-fried dishes, ice cream, marzipan (almond paste), nut oils and sauces. |
| 11 Peanuts | Peanuts are actually a legume and grow underground, which is why it's sometimes called a groundnut. Peanuts are often used as an ingredient in breads, cakes, curries, desserts, sauces (such as satay sauce), as well as in groundnut oil and peanut flour. |
| 12 Sesame Seeds | These seeds can often be found in bread (sprinkled on hamburger buns for example), breadsticks, buns, soups, sesame oil and tahini. They are sometimes toasted and used in salads. |
| 13 Soya | Often found in bean curd, edamame beans, miso paste, textured soya protein, soya flour or tofu, soya is a staple ingredient in oriental food. It can also be found in desserts, ice cream, meat products, sauces and vegetarian products. |
| 14 Sulphur dioxide | This is an ingredient often used in dried fruit such as raisins, dried apricots and prunes. You might also find it in meat products, soft drinks, vegetables as well as in wine and beer. If you have asthma, you have a higher risk of developing a reaction to sulphur dioxide. (Sometimes known as sulphites) |

allergy aware

FREE Training Resources – Cross Contamination risk



AllergyPal

AllergyPAL is designed for:

- small and medium-sized enterprises (SMEs)
- hospitality and catering industries

Linked to the Food Standards Agency (FSA) website the tool will:

- teach you about allergen management
- increase awareness of Provisional Allergen Labelling (PAL) and its purposes

<https://allergy-pal.co.uk/>



PAL – Precautionary Allergen Labelling



F2F Training for businesses



On 18th & 19th May 2026 CBC commissioned Food Allergy Aware to carry out some subsidised and free training.

Both training sessions were fully booked and the level 3 allergy management was passed by all with exceptional standards.

However, it was extremely difficult to get people to book on even though CBC subsidized part of the training. Emails and letters were sent and phone calls that had to be repeated and it was a bit like pulling teeth.

Lessons learnt

- Pick your days carefully thinking of pressures on the team, so not in Jan, Feb, March as coming up to year end.
- Consider is a full day too much for a business to allow staff to take off work
- Get the actual inspecting officer to ring as this has more of an impact
- Cost was too much even though CBC was paying part. Even changed it to a free workshop day in the end just to get people on it in the end.

Next Steps – Webinar



Following the audits it became clear that the sector struggling the most was the Indian Cuisine sector.

Chesterfield had commissioned Food Allergy Aware to do a food allergy awareness webinar to assist businesses but following the audits it was decided to specifically to concentrate on the Indian sector

Next Steps – Webinar



On 19th March Food Allergy Aware presented a webinar for Indian restaurants and takeaways, commissioned by Chesterfield BC - This webinar is now live and has subtitles in Urdu that have been verified

<https://youtu.be/DT36q0Vd89M> you need to click on the cog to get the Urdu subtitles

The screenshot shows a YouTube video player interface. At the top left, there is a hamburger menu icon, the YouTube logo, and a search bar. The video title is "Indian Restaurants and Takeaways Best Practice Allergen Management Guidance" and the date is "Thursday 19 March 2026". The video thumbnail features two speakers: Caroline Benjamin and Sally Isaac. Below the video, there is a "Winner" badge from "Allergy Awards 2025". At the bottom, there is a "Subscribe" button for "Chesterfield Borough Council" with 555 subscribers. A Urdu subtitle is visible at the bottom of the video frame: "اس کے ساتھ ساتھ بہت چہیت کر رہے ہیں اور میں نے ساتھ دوبارہ شامل ہوں گے اور میں آپ کو".



Additional Resources offered after the webinar

Safer food, better business for Indian cuisine

Food safety management pack for small catering businesses such as restaurants and takeaways that serve Indian, Pakistani, Bangladeshi and Sri Lankan cuisines.

Last updated: 5 February 2024

[See all updates](#)



View as PDF



Print this page

https://www.food.gov.uk/sites/default/files/media/document/sfbb-indian-cuisines-pack-jan-2020-fixed_0_0_3.pdf

SFBB Indian Restaurant guidance

- To comply with the law all businesses must declare how they prepare cook and serve food safely and this includes allergen management.
- There is an SFBB Indian Restaurant specific document with guidance which can be downloaded from the FSA website which includes allergen detail. This should be completed by the FBO and kitchen team and kept in an accessible place.
- It should be reviewed when there are any changes



**SAFER FOOD
BETTER BUSINESS
INDIAN, PAKISTANI,
BANGLADESHI AND
SRI LANKAN CUISINES**

Summary - Check List – Indian Cuisine



- FSA online training recommended for all staff as a minimum. At least 1 member of staff with a good understanding of allergens and the ability to communicate in English.
- Download and complete SFBB for Indian Restaurants to include 2 stage cleaning and allergen management
 - ❖ Download & complete the Chesterfield Allergen pack
- Check for May Contains on all ingredients and in-house processes and add to matrix as appropriate (gluten cc from loose flour Naan & Chapattis)
- Label prepared foods in fridge / freezer with allergen information
- Spices to be stored in clean and correctly labelled containers.
- Documented processes for safe preparation and cooking
- Update Front of House and Back of House signage.
- Hand wash signage in the kitchen.

What Did the CBC Audits Tell Us?

Driving Consistency in Allergen Management

The CBC audit reviews highlighted significant variation in how allergen controls are interpreted and implemented across the food sector. While many businesses demonstrated good practice, inconsistencies remained in key areas including:

- Documentation and allergen procedures.
 - Staff knowledge and confidence.
 - Communication between front and back of house.
 - Verification that procedures are consistently followed.
 - Consideration of allergens beyond the Top 14.
 - Recording and learning from near misses and complaints.
- **The challenge:**
Food hypersensitive customers expect the same level of confidence and protection regardless of where they choose to eat.
 - **The opportunity:**
Can we support businesses to move beyond minimum compliance towards recognised best practice and greater consistency?

Why is Allergen Management Certification Needed?

Moving Beyond Minimum Compliance

- Compliance with legislation does not always equate to best practice.
- Many businesses meet legal requirements but lack robust systems for verification, monitoring, and continuous improvement.
- Certification encourages businesses to embed allergen management throughout their operations rather than treating it as a standalone requirement.

What are your thoughts? Will allergen management certification drive

- Better standards
- Consistency

Benefits

Benefits for Food Hypersensitive (FHS) Customers

- ✓ Greater confidence when dining out.
- ✓ Improved communication and transparency.
- ✓ More consistent experiences across venues.
- ✓ Reduced risk of avoidable allergen incidents.

Benefits for Food Business Operation (FBO)

- ✓ Independent recognition of good practice.
- ✓ Increased staff confidence and accountability.
- ✓ Evidence of due diligence.
- ✓ Enhanced customer trust and reputation.
- ✓ A clear roadmap for continual improvement.

Supporting Local Authority Objectives

- ✓ Encourages businesses to adopt a proactive approach to allergen management.
- ✓ Reinforces messages delivered through inspections, audits, and advisory visits.
- ✓ Provides an additional mechanism for recognising and encouraging good practice.
- ✓ Supports a culture of continual improvement across the local food sector.

How Can Local Authorities Be Part of the Solution?

Supporting Better Outcomes Together

The certification is not intended to replace regulation or inspection. Instead, it complements existing enforcement activity by encouraging businesses to embed best practice.

Potential Benefits for EHOs and TSOs

- Promotes consistency of allergen standards across businesses.
- Encourages a proactive rather than reactive approach.
- Provides an additional tool to support businesses seeking improvement.
- Reinforces key messages delivered during inspections and interventions.
- Supports education and behavioural change within businesses.
- Demonstrates partnership working between regulators and industry.
- Helps build public confidence in the safety of the local food sector.

How You Can Engage

- ✓ Signpost businesses that wish to demonstrate excellence.
- ✓ Share feedback from your experiences in the field.
- ✓ Participate in the evaluation of the pilot.
- ✓ Help shape a practical, proportionate framework that works for regulators, businesses and consumers alike.

Together, we can help create a safer and more consistent dining experience for everyone living with food hypersensitivity.

Introducing the Pilot Food Allergy Aware Certification

From Compliance to Confidence

The Food Allergy Aware Certification has been developed to provide a structured framework that helps businesses demonstrate robust allergen management.

The pilot programme assesses businesses against standards covering:

- Policies and documented procedures.
- Staff training and competency.
- Supplier controls and purchasing.
- Storage, preparation and service practices.
- Communication with customers.
- Verification, auditing and continual improvement.
- Management of near misses and corrective actions.




Food Allergy Aware Certification 4596 4200

Interested in our discounted 2 year pilot offer - get in touch
Limited spaces!

foodallergyaware.co.uk/grow-your-business
m: 07752637292 | e: admin@faac.co.uk





**What will you do
differently as a result of
this training?
Q & A**

Caroline Benjamin - MIH, MSOFHT
Founder
Food Allergy Aware

e: Consultancy@fatc.co.uk | t: 07732637292 | LinkedIn - <https://www.linkedin.com/in/caroline-benjamin64/>

Best Practice Allergen Audit Guidance

Thursday 25 June 2026



Caroline Benjamin



Coffee Shop STOP THINK Guidance



Alix Baker – Wakefield Council





STRIKING THE BALANCE:

**Navigating Consumer and
Regulatory Expectations in Food
Allergy Risk Management –
With a Focus on Cow's Milk**

HERE FOR BUSINESS



Commercial Waste · Regulatory Support · Training Courses · Pest Management · Grounds Maintenance

Business minded, socially responsible.

wakefield.gov.uk/hereforbusiness

wakefieldcouncil
working for you

Introduction

**Alix Baker BA (Hons)
MSc MCIEH CEnvH**

**Environmental Health
Commercial Team
Manager**





**Unlocking Success with
Primary Authority Partnerships**



**Balancing Business &
Social Responsibility**



**Addressing the Hidden Risk
of Cross Contact**



**Promoting Best Practice for
Food Allergen Management**



Department for
Business & Trade

PRIMARY
AUTHORITY

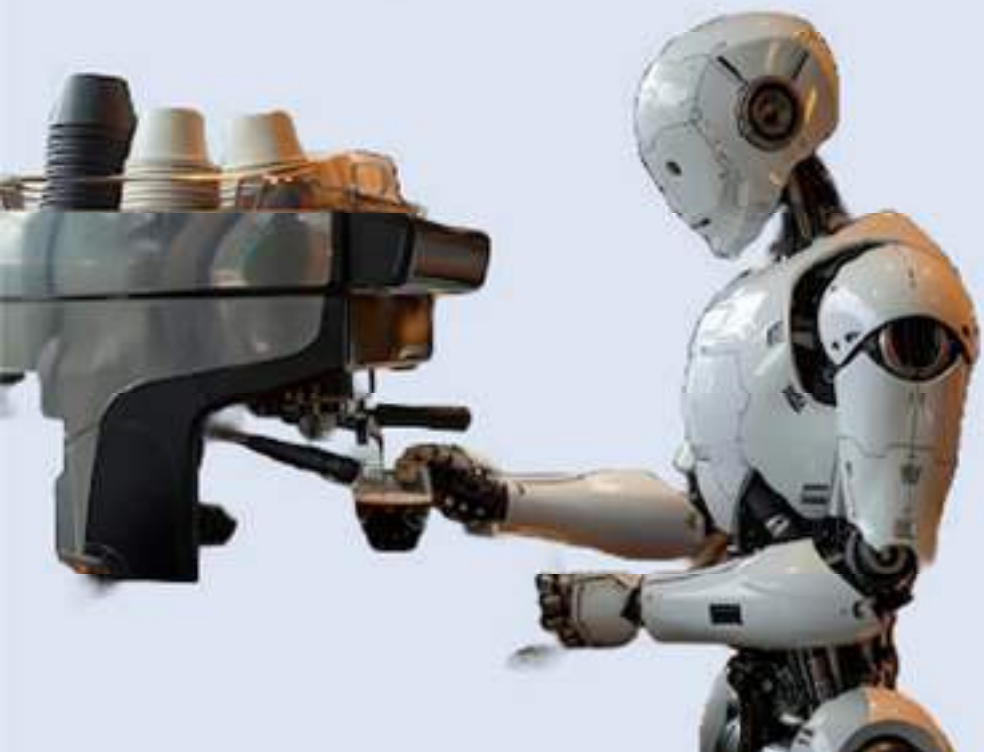
wakefieldcouncil





BUSINESSES





TikTok

@jatpreactions





ALLERGEN



ALLERGI

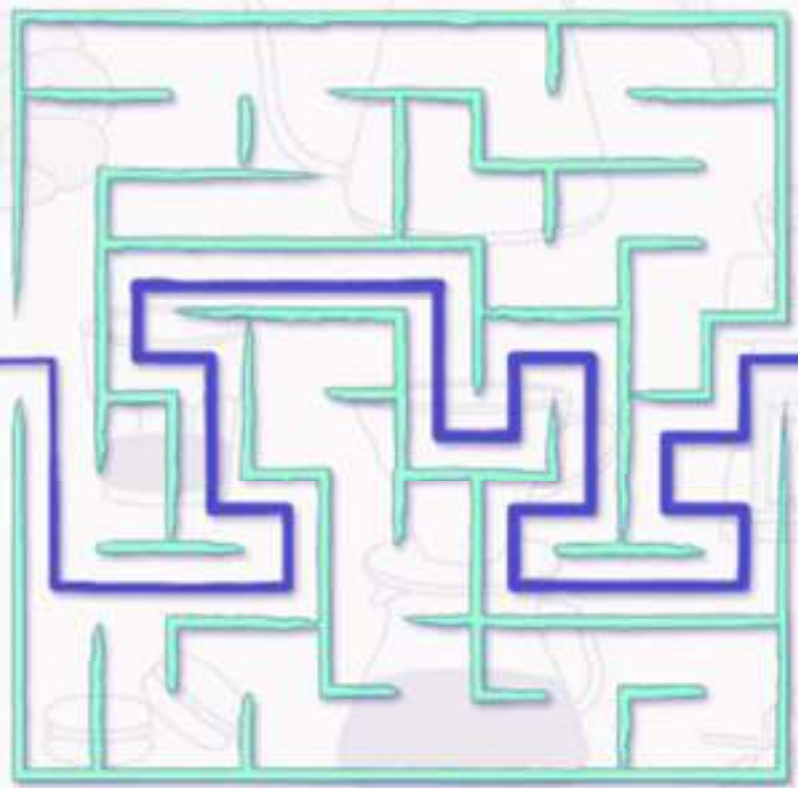
ALLERGI

REGULATION (EC) No 853/2004 CHAPTER IX - Provisions applicable to foodstuffs.

Equipment, conveyances and/or containers used for the processing, handling, transport or storage of one of the substances or products causing allergies or intolerances, referred to in Annex II to Regulation (EU) No 1169/2011, shall not be used for the processing, handling, transport or storage of any food, not containing that substance or product, unless the equipment, conveyances and/or containers have been cleaned and checked at least for the absence of any visible debris of that substance or product

PROBLEM

SOLUTION



OUR JOURNEY TO CHANGE

Coffee shop panel established



STOP! THINK METHOD

Validation through sampling and analysis/FSA



Amends to guidance and visual aids



Soft launch of guidance and visual resources





Coffee Shop Panel est.

STOP!
T.H.I.N.K

GOOD PRACTICE



TALK



HYGIENE

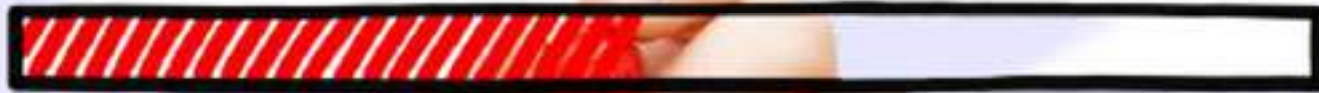


INTEGRITY



NOTIFICATION

SKILLS LOADING...



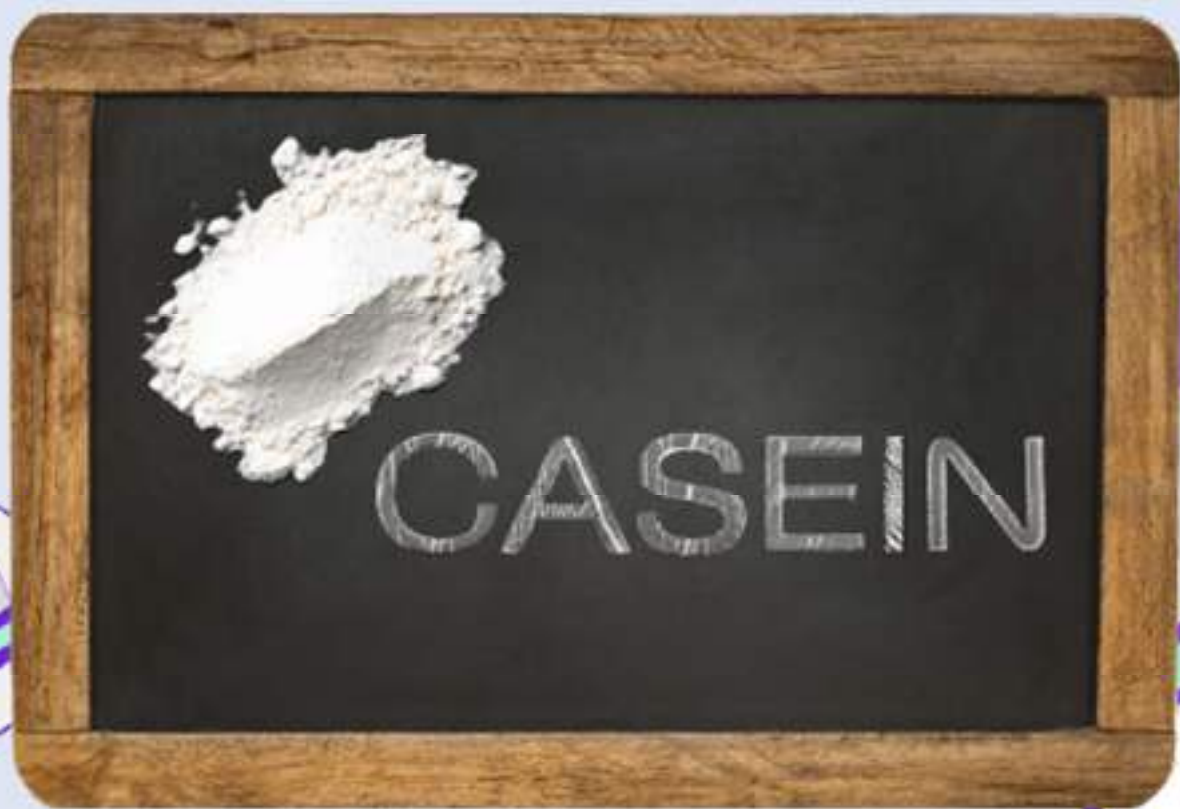
KNOWLEDGE





PHASE 1

PHASE 2





Quantitative

Qualitative



ELISA

8–12 grains of salt
in a 1kg bag



LFD

1 grain of salt on
10cm × 10cm surface

NOT DETECTED:	No "T" & a Strong "O" Line	Allergen NOT Detected
DETECTED (Low):	Weak "T" & a Strong "O" Line	Allergen Detected
DETECTED (Mod/High):	Visible "O" and/or "T" lines	Allergen Detected
DETECTED (Very High):	No "O" and/or "T" lines	Allergen Detected

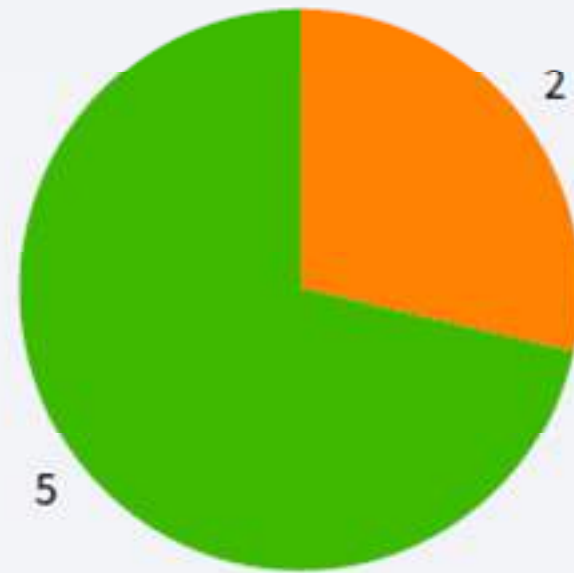


PHASE 1



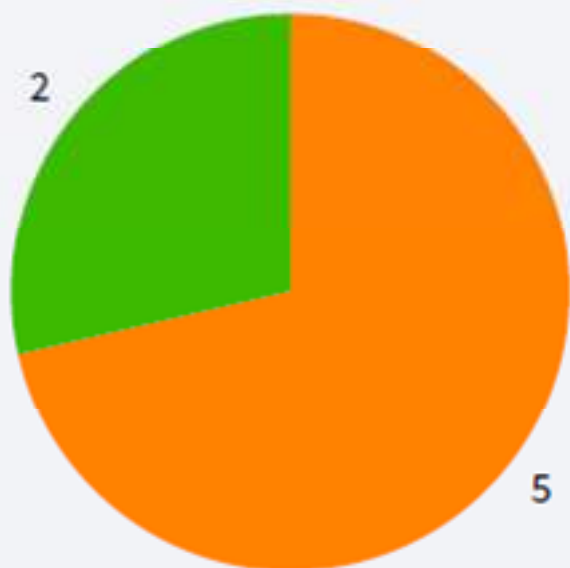
- DETECTED (HIGH)
- DETECTED (LOW)
- NOT DETECTED

PHASE 2



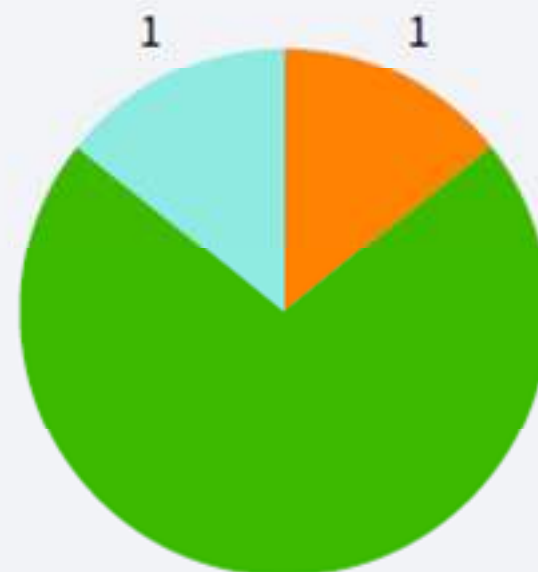
- DETECTED (LOW)
- NOT DETECTED

PHASE 1



DETECTED (LOW)
NOT DETECTED

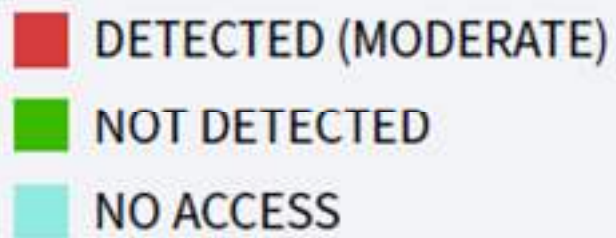
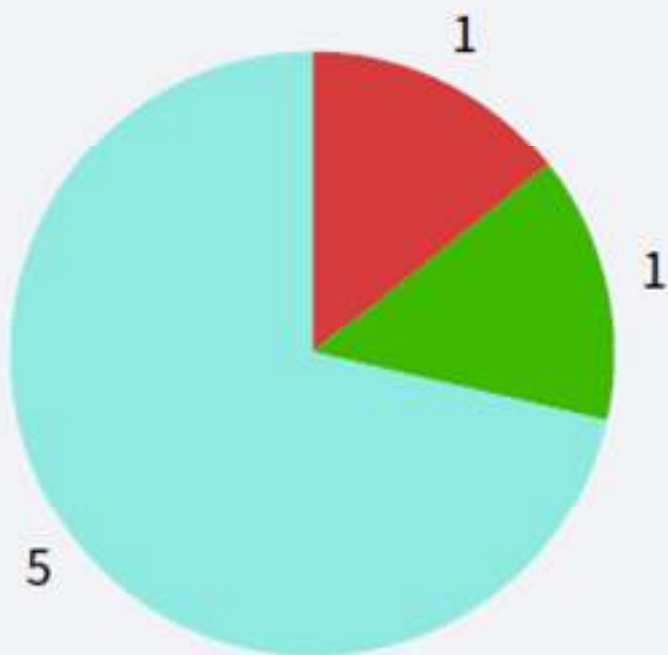
PHASE 2



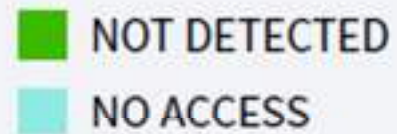
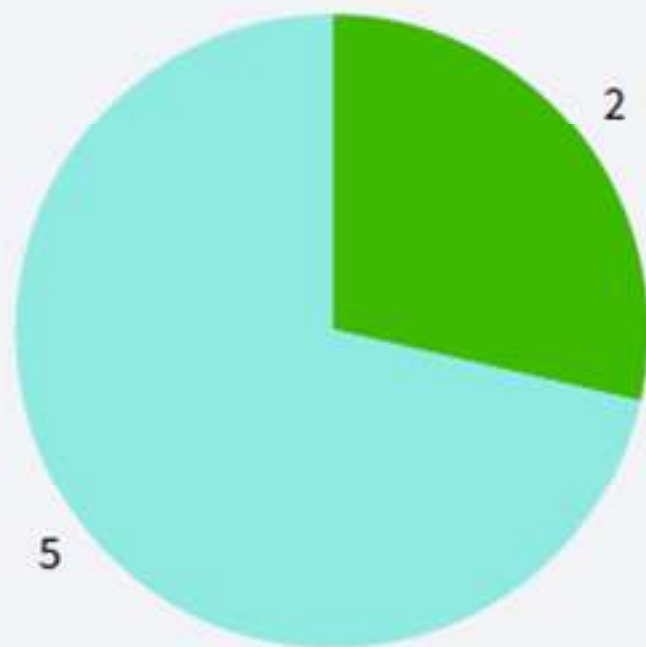
DETECTED (LOW)
NOT DETECTED
INVALID



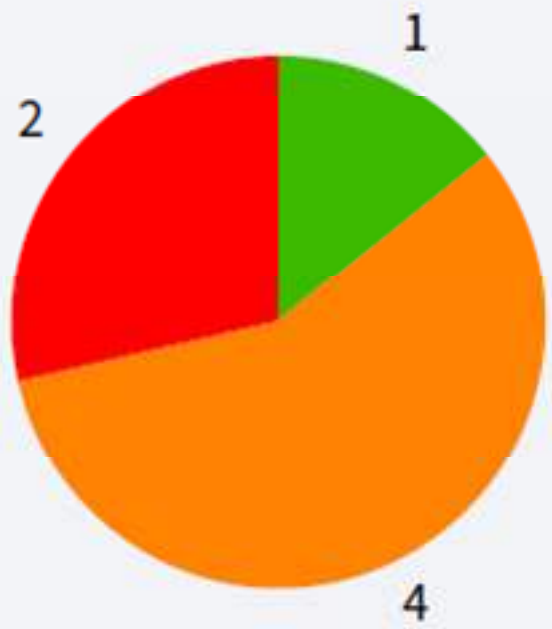
PHASE 1



PHASE 2



PHASE 1



- NOT DETECTED
- DETECTED (LOW)
- DETECTED (HIGH)

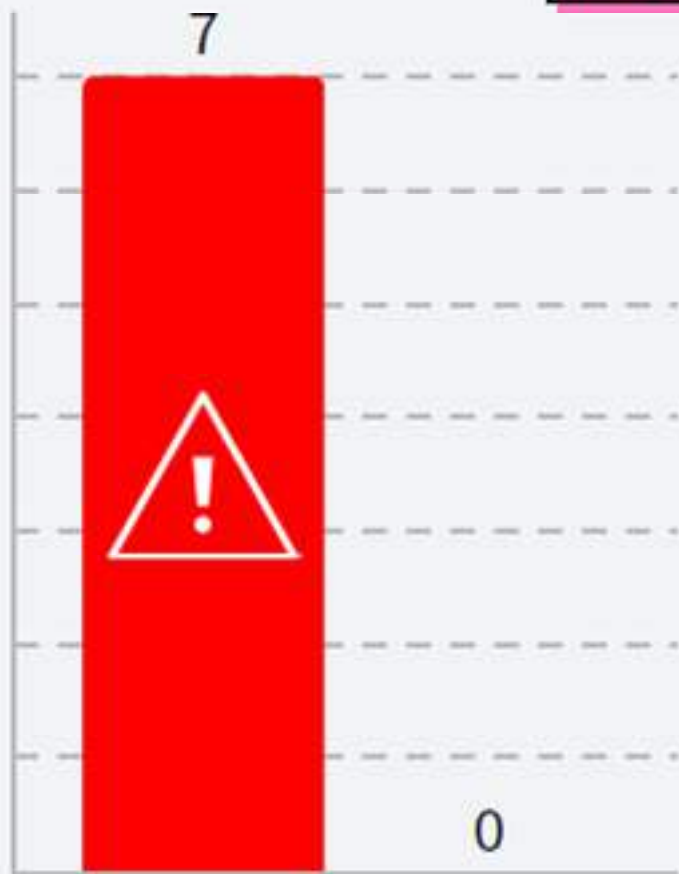
PHASE 2



- NOT DETECTED
- DETECTED (LOW)



PHASE 1



YES NO



DETECTED (LOW)
DETECTED (HIGH)



OTHER AREAS SAMPLED	PHASE 1	PHASE 2
FRIDGE HANDLE	DETECTED (LOW)	NOT DETECTED
HIGH-CHAIR RAIL	DETECTED (LOW)	DETECTED (LOW)
HIGH-CHAIR STRAP	DETECTED (LOW)	DETECTED (LOW)
HAND WASH BASIN	DETECTED (HIGH)	DETECTED (LOW)
SYRUP BOTTLE HAND PUMP	DETECTED (LOW)	DETECTED (LOW)
TILL SCREEN	DETECTED (HIGH)	DETECTED (LOW)
COFFEE MACHINE HANDLE FILTER	DETECTED (HIGH)	DETECTED (LOW)



[Accessibility Statement](#)

How to play?



Ts & Cs



Coffee Shop Aroma

Wake up and smell the coffee. Perk up your allergen knowledge to brew a safe and smart experience for everyone. We're serving up something fresh - check out the new guidance and visual aid for the STOP! THINK method below.

[Play coffee shop scenario](#)

[STOP! THINK guidance](#)

[Cleaning Evaluation](#)

[Accessibility Statement](#)

[How to play?](#)



[Ts & Cs](#)

PRIMARY AUTHORITY

COFFEE SHOP PANEL GUIDANCE

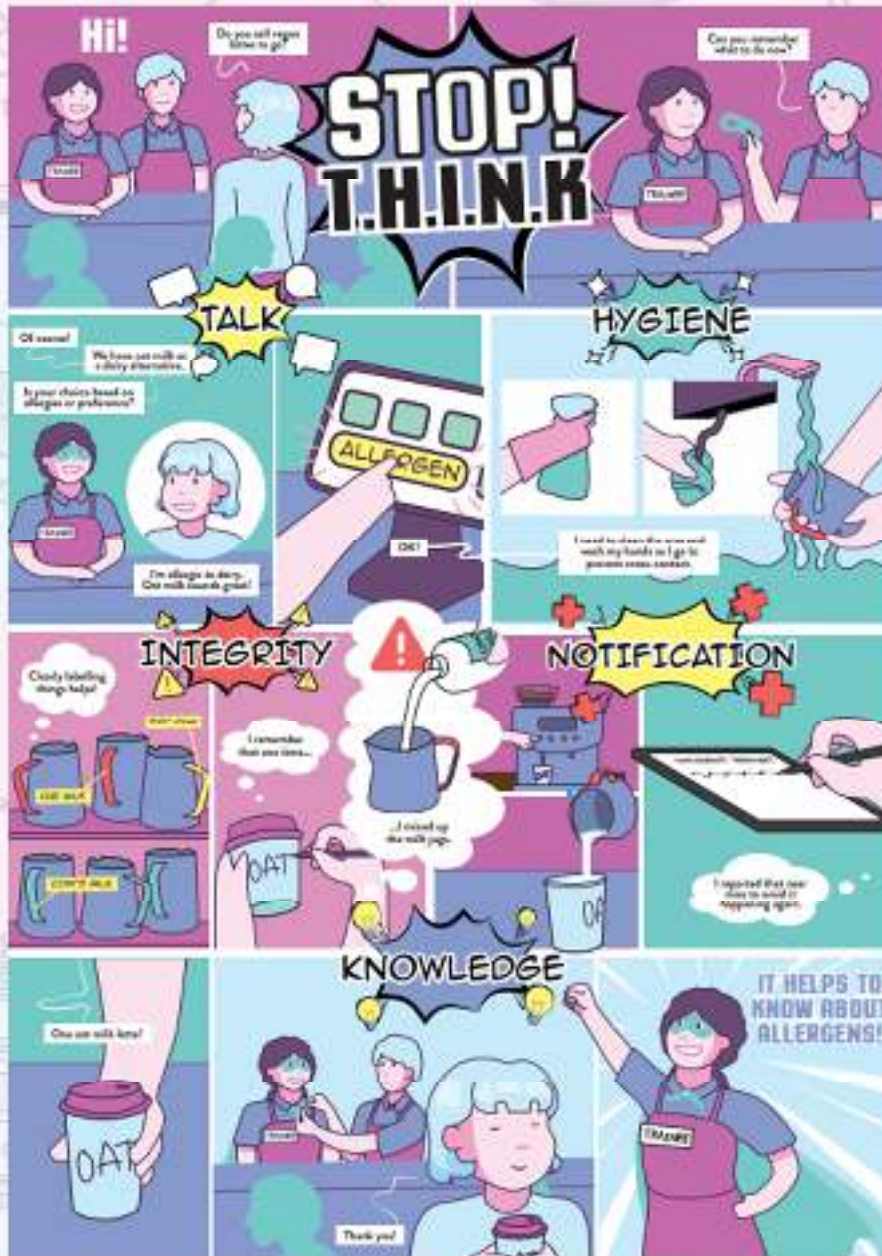
Introducing the STOP! THINK method – a practical approach designed to help coffee shop operators improve how they manage food hypersensitivities when preparing both hot and cold beverages.

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-
- **Allergen risks are increasing** — the industry must evolve to meet this growing challenge.
 - **Transparency is critical** — businesses must clearly communicate what they can and cannot guarantee, including within franchise models.
 - **Never claim "free from"** — it's not operationally realistic and creates dangerous false assurance.
 - **Real change through partnership** — our Primary Authority collaboration demonstrates how guidance can be both practical and effective.
 - **Standardisation is key** — consistent messaging and actions support safer choices for people with allergies.
 - **Test, learn, adapt** — validation through sampling has proven that additional steps can reduce risk to manageable levels for most.
 - **Collaboration drives progress** — by working together, we can create meaningful change across the coffee shop sector.
 - **This is just the beginning** — our STOP THINK guidance sets the foundation for promoting best practice industry-wide.

THANK YOU!



HERE FOR BUSINESS

POWERING COMPLIANT BUSINESSES
by **wakefieldcouncil**

**STRONGER.
SMARTER.
COMPLIANT.**



PRIMARY AUTHORITY

REGULATORY PROTECTION.
PEACE OF MIND.

**EXPERTS IN HELPING BUSINESSES STAY SAFE,
COMPLIANT AND CONFIDENT.**



PRIMARY AUTHORITY

Expert regulatory
protection and
assurance.



HEALTH & SAFETY

Keep your people
safe and your
business protected.



FOOD SAFETY

Safer food.
Happier customers.
Stronger reputation.



TRAINING

Engaging training
that builds
confidence.



CONSULTANCY & ADVICE

Tailored advice
that solves
real challenges.

**SIMPLE.
PRACTICAL.
PERSONAL.**



**WORKING WITH BUSINESSES
ACROSS WAKEFIELD TO
REDUCE RISK, SAVE TIME
AND DRIVE SUCCESS.**



Clare Bristow
Caroline Benjamin
Alix Baker



REFRESHMENTS



Legal Aspects, Interventions & Stop Notices



By

Iain Ferris

University of Birmingham

Assistant Professor in Food Safety, Standards & Legislation



Overview of Today's Presentation

- Regulatory framework for allergen information
 - Challenges in allergen management for non-prepacked foods
 - PPDS requirements and practical issues
 - Accuracy and reliability of allergen information
 - Risk assessment of cross-contact
 - Disclaimers & precautionary allergen labelling
 - Opportunities for improvement

Providing Information

- Article 44 of Regulation 1169/2011 prescribed that member states can decide what information is provided for non-PP foods
 - But allergy information must be provided
 - MS can decide how it is provided
- Regulation 5 of the Food Information Regulations 2014 requires information to be provided
- Can be provided in any way desired
- Only prescribes that information must be provided for 14 allergens
- No offence for incorrect/inaccurate allergen information under food information regs
- Doesn't prescribe that allergen information must be written down

Challenges

- Difficult to assess business as non-compliant
- Food Information Regulations do not cover unintentional allergens
- Hygiene v Food Standards legislation
- Who enforces? EHOs V TSOs
- What to do when incorrect allergen information is observed



Prepacked for Direct Sale (PPDS)

- Requires a full ingredients list with allergens highlighted and the name of the food to be applied
- Reg 5A does not apply to distance sales
- Many ways to circumnavigate requirements
 - Leaving bag open at one end
 - Keeping lid open
 - Don't wrap individually

Distance Sales

- Reg 5 & 5A of Food Information Regs 2014 don't apply
- Article 14 of Reg 1169/2011 does & requires info to be available in accordance with article 44
 - At point of sale & moment of delivery
- Article 44 requires allergen information for non-PP foods as per Article 9.1(c).

Factors that may invalidate allergen information

- Change in suppliers/recipes
- Shortages
- Lack of review
- Poor training/understanding

MEET OUR NEW BOTTLE MADE WITH 100% RECYCLED PLASTIC

YOU MAY NOTICE OUR BOTTLES ARE SLIGHTLY DARKER. IT'S THE SAME GREAT MAYONNAISE YOU LOVE, NOW IN A BOTTLE MADE WITH 100% RECYCLED PLASTIC.

Light reduced calorie mayonnaise - 60% less calories than Hellmann's Real Mayonnaise.
 Ingredients: Water, rapeseed oil (25%), spirit vinegar, modified starch, sugar, salt, EGG yolk (1.5%), cream powder (MILK), citrus fibre, natural MUSTARD (flavouring, thickeners (gar gum, xanthan gum), MUSTARD flour, lemon juice concentrate, antioxidant (calcium disodium EDTA), paprika extract, sunflower oil. Gluten free.

Source of Omega 3. Committed to sustainably sourced oils. 100% Free Range Eggs.

NUTRITION INFORMATION			
(Typical values)	Per 100g	Per portion**	%* per portion**
Energy	1125 kJ/ 264 kcal	169 kJ/ 40 kcal	2 %
Fat	26 g	4.0 g	6 %
of which saturates	2.6 g	0.4 g	2 %
Carbohydrate	6.1 g	0.9 g	< 1 %
of which sugars	2.3 g	< 0.5 g	< 1 %
Protein	< 0.5 g	< 0.5 g	< 1 %
Salt	1.7 g	0.25 g	4 %
Omega 3 ¹	2.3 g	0.35 g	

¹From plant sources
 *% of Reference Intake of an average adult (8400 kJ / 2000 kcal)
 **1 portion = 15g (pack contains approx 28 portions)

Unilever UK, Hellmann's, Freepost ADM 3940 London SW1A 1YR
 Unilever Ireland, 20 Riverwalk, Citywest, Dublin 24



430ml

MEET OUR NEW BOTTLE MADE WITH 100% RECYCLED PLASTIC

YOU MAY NOTICE OUR BOTTLES ARE SLIGHTLY DARKER. IT'S THE SAME GREAT MAYONNAISE YOU LOVE, NOW IN A BOTTLE MADE WITH 100% RECYCLED PLASTIC.

Hellmann's Real Mayonnaise.
 Ingredients: Rapeseed oil (78%), EGG & EGG yolk (7.9%), water, spirit vinegar, sugar, salt, lemon juice concentrate, flavourings, antioxidant (calcium disodium EDTA), paprika extract, sunflower oil.

A good source of Omega 3.
 100% Free Range Eggs.
 Committed to sustainably sourced oils.

NUTRITION INFORMATION			
(Typical values)	Per 100g	Per portion**	%* per portion**
Energy	3034 kJ/ 725 kcal	428 kJ/ 102 kcal	5 %
Fat	79 g	11 g	18 %
of which saturates	6.2 g	0.9 g	5 %
Carbohydrate	1.4 g	< 0.5 g	< 1 %
of which sugars	1.3 g	< 0.5 g	< 1 %
Protein	1.1 g	< 0.5 g	< 1 %
Salt	1.2 g	0.17 g	3 %
Omega 3 ¹	7.2 g	1.0 g	

¹From plant sources
 *% of Reference Intake of an average adult (8400 kJ / 2000 kcal)
 **1 portion = 14g (pack contains approx 28 portions)

Unilever UK, Hellmann's, Freepost ADM 3940 London SW1A 1YR
 Unilever Ireland, 20 Riverwalk, Citywest, Dublin 24



Incorrect allergen information

- Food considered unsafe where incorrect information was provided
- Is there an imminent risk to health
- What about incorrect information on a matrix
- Is it better not to have it written down?
- When do you review?

How do we address poor allergen management?

- Do we prohibit the process of serving foods described as suitable for people with allergies?
- Voluntary 'stop' agreements/notices?
- Improvement Notices
 - Food Information
 - Hygiene
- Do enforcement officers have the right tools for the job?

How well do we use HACCP for allergens?

- Allergens are a hazard and fall within the scope of hygiene laws
- HACCP is proactive
- Smaller businesses tend to struggle to implement
- Prerequisite Programmes v HACCP
 - Allergen management is a PRP
 - Unlikely to have CCPs

Precautionary Allergen Labelling

- Not standardised
 - Overuse – PAL when there is little risk
 - Underuse – No PAL when there is a risk
 - Misuse – PAL to cover lack of information/allergen management
- Is it voluntary?
- Unregulated but not really voluntary



How do we assess the risk of cross-contact

- Risk = likelihood x severity
- Severity is impacted by how much allergen may be present
- Likelihood is affected by the effectiveness of controls or lack of.
 - Use of same equipment
 - Ineffective cleaning
- Form of the allergen
 - Powder
 - Liquid
 - Particulate

Challenges

- Ability to carry out a meaningful risk assessment
- Non-homogeneous nature of contamination
- Lack of regulation for
 - Acceptable levels
 - Mandatory assessment
- Lack of research to identify risk
- Evidential versus theoretical
- Consumer's understanding

Potential standard

- Precautionary allergen labelling **is based on findings of a risk assessment** carried out by food-business operators.
- Precautionary allergen labelling shall only be applied if the risk assessment reveals that one or more of the reference values have been exceeded.
- Allergen labelling may be applied as a precautionary measure to artisan foods if the risk assessment shows that cross-contamination with one or more of the allergens **is possible in practice.**
- The wording 'May contain xxx' or 'Not suitable for xxx' shall be used when precautionary labelling is applied.

Disclaimers

- Are they valid?
- Can't guarantee any foods allergen free
- Can't guarantee the information is correct

Suggestions for improvements

- Written allergen information
 - Provides clarity/certainty
 - Starting point for any assessment of cross-contact
 - Makes training simpler
 - Allergic consumers want it
- Improved training
 - warning of the dangers of change
 - Cross-contact risks
- Encourage PAL based on evidence
- Consistency in enforcement
- Review of regulations and enforcement powers



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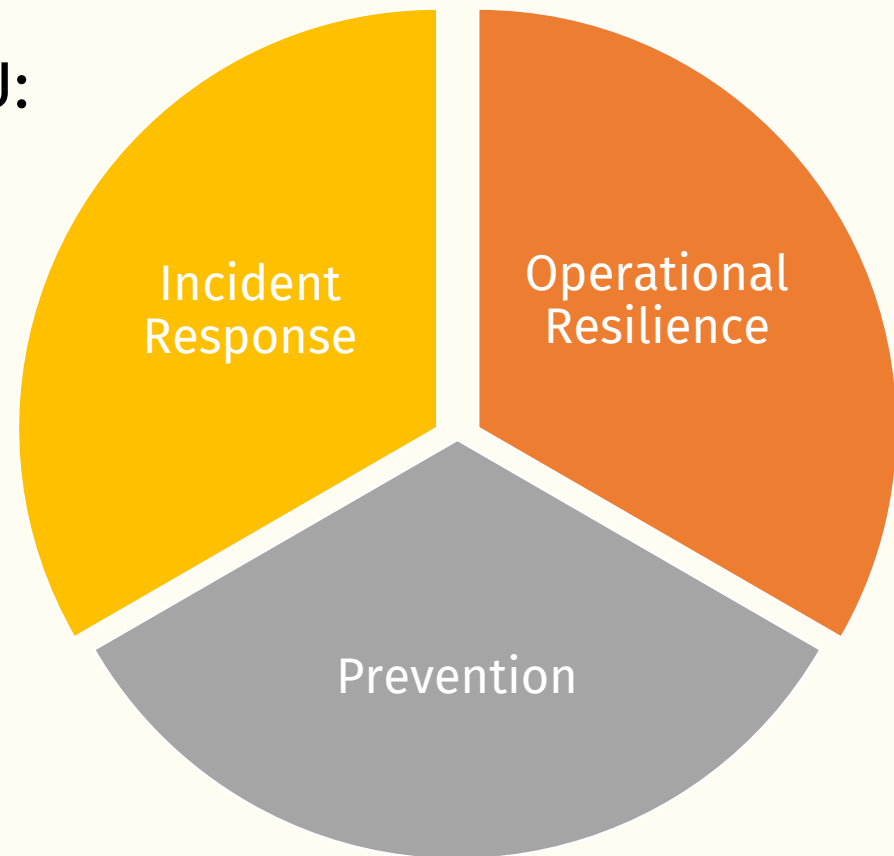


Roles and Responsibilities

- FSA is both the **Regulator and Central Competent Authority** for Food Safety, (along with Food Standards Scotland (FSS)).
- The FSA operates in England, Northern Ireland, and Wales and has **different policy responsibilities** within these countries.
- FSA is the UK INFOSAN Emergency Contact Point (ECP) - **statutory obligation for us to inform and be available to be informed – safety risk, (including negligible).**
- Several domestic **INFOSAN IHR focal point**, which FSA approve e.g. UKHSA, APHA.

Incidents and Resilience Unit

- There are three parts to the IRU:
 - Incidents Response
 - Operational Resilience
 - Prevention





What is a food incident?

Chapter 5, Food Law Code of Practice deals with food incidents, food hazards and Food Alerts.

A 'food incident' is defined as any event where, based on the information available, there are concerns about **actual** or **suspected threats** to the safety, quality or integrity of food that could require intervention to protect consumers' interests.

Quality should be considered to include food standards, authenticity, and composition.

Types of incidents may include:

- Allergens
- Chemical (E.g. vet meds, dioxins, natural, process)
- Microbiological (bacterial, viral, fungal, parasitic, algal)
- Physical (glass, metal, hair, wood, rubber etc.)
- Environmental (spills, leaks & fires)
- On-Farm (notifiable disease/poisoning)
- Animal Feed, (chemical, micro, GMOs, SRM)
- Malicious tampering and deliberate contamination



Incident Notifications

Initial alerting of an incident / potential incident may originate from many sources:



Incident Notifications – allergy the exception

FSA do not accept notifications from consumers, they are redirected to LAs

In the *case of serious allergy incidents, (hospitalisation or death), we do accept consumer notification

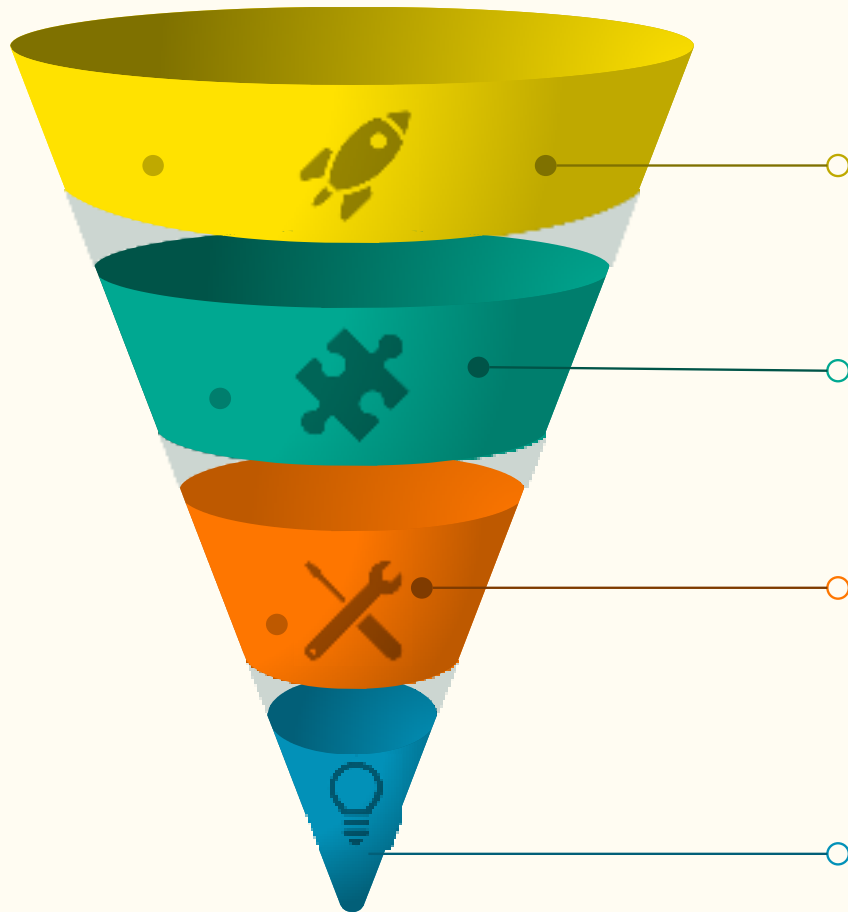
* Other case by case exceptions

SOP – serious illness and deaths – clear governance with executive level involvement



Prevention

Signal detections – early identification of risk signals through horizon scanning of web sources and prioritisation



SCANNING IDENTIFIED SOURCES FOR RISKS

Scanning for recalls, alerts and other related web articles in various reliable sources around the globe

FILTERING FOR FOOD RELATED RISKS

Using Machine Learning (ML) algorithms to establish whether the signals are related to food, feed or food contact material

EXTRACTION: PRODUCT, HAZARD ETC.

Using ML algorithms to automatically extract the key labels for risk signals prioritisation: hazard, product, country of origin etc.

PRIORITISATION OF IDENTIFIED RISKS

Automatically triage all food safety risk signals identified in Step 2 as 'High / Medium / Low' risk
E.g. Allergens → High; Novel foods → Medium; Feed additives → Low

TRIAGED RISKS

Root Cause Analysis

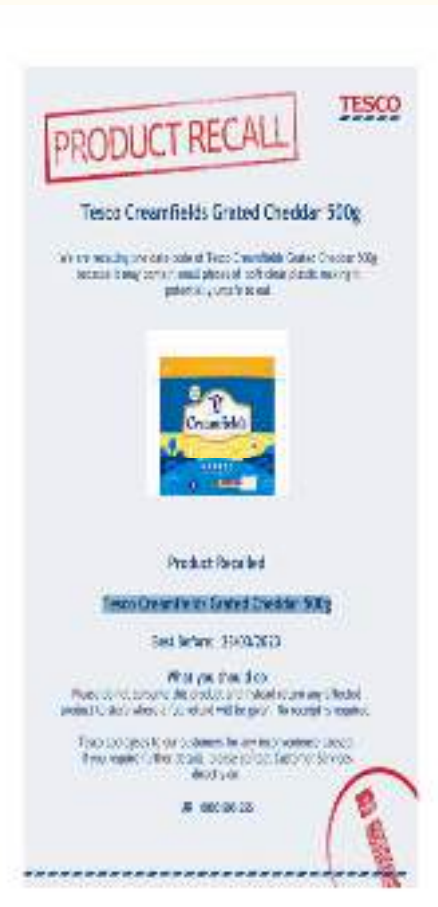
- An area of strategic focus at the FSA
- Recognise value in reducing repeated incidents and enables system learning
- Series of industry and government working groups
- RCA insights publications – 1st one on animal feed incidents, next edition – foreign body - July
- Categories and definition guidance developed – published soon (mid July)



Incidents Management

Incidents Response: what do we do?

- We manage incidents, working with Local Authorities, other stakeholders and industry to ensure food is safe and to ensure unsafe food is removed from the market.
- We also work with Field Operations colleagues on incidents at FSA approved establishments.
- Incidents team coordinate with FSA colleagues to provide risk management advice, (where required).
- Proactive and reactive comms is published when necessary.
- We respond to food & feed safety incidents 365 days, including Out of Hours (OOH) cover.



What happens when FSA gets notified of an incident?

Incidents may ask the notifier to provide further information

Incidents will ask policy colleagues for risk management advice

Policy will request a risk assessment if required

FSA can only provide advice

LA/field operations to take enforcement action if appropriate

Media interest considered and comms lines developed if required

Reporting Food Incidents to the FSA



Food incidents, where appropriate, should be reported by:

- Clicking on the following link [Report a food safety incident - GOV.UK](#)
- emailing the FSA's Food Incidents Response Team at fsa.incidents@food.gov.uk
- Tel: 020 7276 8448 (also covers out-of-hours)

When to notify the FSA - FLCoP

5.2.2 – LAs should categorise the hazards

- Localised food hazard
- Serious localised food hazard
- Non-localised food hazard





When to notify the FSA

5.2.2 – Serious localised food hazard - allergen

- *'one in which the affected food is not distributed beyond the boundaries of the Competent Authority, but **involves or may involve:***
 - *undeclared allergens, a serious anaphylaxis reaction requiring medical intervention as a result of allergens in food, hospitalisation, or death as a result of allergens in food'*

Hospitalisation or death – notify FSA

- Undeclared allergens – is serious, (even if localised) and we do expect to be informed
- noting 178/2002 burden is not to be definite
- considers or has reason to believe

When to notify the FSA



5.2.2 – Non-localised food hazard

- ‘one in which the affected food is distributed beyond the boundaries of the Competent Authority. These should be notified by the Competent Authority to the FSA Incidents Team and other relevant agencies at the earliest opportunity, by the quickest available means, and confirmed in writing



When to notify the FSA

5.2.3 Incidents involving more than one

‘Competent Authority In accordance with the Competent Authority’s documented procedure(s) for food incidents and Food Alerts, Competent Authorities should discuss and agree a lead Competent Authority to take the lead for the investigation of incidents that require involvement of more than one Competent Authority.’

Do you have this procedure?

How would you achieve this agreement?

FSA Action upon receipt of an incident

- Incident received by the FSA is allocated an Incident Number and allocated to a Lead Officer (LO)- Priority level allocated
- The LO will then make contact with the LA for the Food Business operator (FBO). If the FBO has a Primary Authority Partnership, the relevant officer at the PA will also be copied into any correspondence.
- FSA use FSA Link directory to find LA details so it is important that LAs ensure that all contact details regarding Lead Officers/email addresses are correct and up to date.
- It is important to provide as much information as possible when notifying FSA of an incident/food hazard so that appropriate Risk Management advice can be provided in a timely manner when requested.
- Should the LO need additional information, they will contact the LA and request this.

Risk Management Advice (RMA)

- All information received from the LA will be sent to FSA Risk Managers for review to enable risk management advice to be provided by the FSA.
- RMA should only be requested where needed. If the LA do not require RMA, this should clearly be outlined in the incident notification.
- All incidents that are referred for RMA are assessed on a case-by-case basis, and case by case advice is provided.
- RMA provided to LAs in response to an incident cannot be taken to be 'assured advice.'
- Risk Managers may request for a Risk Assessment (RA) to be completed where this is deemed necessary to inform risk management advice.
- This information will be communicated by the ILO to the food business via the LA/PA or to the food business directly if required in certain circumstances.
- FSA RAs will not be shared externally as a routine.

Recap on FBO requirements – Article 19 – 178/2002

- *‘it shall immediately initiate procedures to withdraw’*
 - **food safety is not 9-5, Monday to Friday**
- *‘Where the product may have reached the consumer, the operator shall effectively and accurately inform the consumers’*
 - **Company reputation, brand protection, cannot be put before consumer protection**
- If food ‘may be unsafe’ – the FBO action is not precautionary, food must be safe, and must be removed when unsafe, and when it is sold at retail, it must be recalled.

Recap on FBO requirements – Article 19 – 178/2002

- An FBO ‘shall **immediately** inform the competent authorities if it considers or has reason to believe that a food which it has placed on the market may be injurious to human health.’
- ‘Operators shall inform the competent authorities of the action taken to prevent risks to the final consumer.’



Product Withdrawals and Recalls

As a result of a food incident, a food product may have to be withdrawn or recalled.

- A withdrawal is when unsafe food is removed from the supply chain before it has reached consumers.
- A recall is when unsafe food is removed from the supply chain and consumers are advised to take appropriate action, for example to return or dispose of the unsafe food.

Food Business Operator Withdrawal/Recall

FBOs may notify the FSA directly of incidents. In these cases the FSA will:

- Advise the FBO they must also inform their enforcement authorities
- FSA will inform the Competent Authorities
- FSA will inform other countries across the UK affected, (system based notification)
- FSA will inform other countries if the product is imported to the UK or has been exported from the UK, where there is a safety risk.
- FSA expect the Importer FBO to liaise directly with the country of origin when the incident does not pose a food safety risk, (non-compliance incidents).



Food Alerts

- Where a food business undertakes a product recall, the FSA will decide if it is necessary and appropriate for the FSA to amplify these messages in an FSA alert.
- An **Allergy Alert (AA)** is published when the product has been, or is being, recalled from consumers because allergen information on food labels is either undeclared (including not in English) or incorrect.
- A **Product Recall Information Notice (PRIN)** is published when there are concerns about the safety of a product, most often due to the contamination, mis-packing or mis-labelling of products.
- A **Food Alert For Action (FAFA)** is issued to local authorities and published for consumers when distribution of products is less well defined or when a food business is not taking the required steps to remove product from sale and remedial intervention action from local authorities is required.
- FSA alerts amplify food/feed business product recalls, FSA alerts are not the product recall.

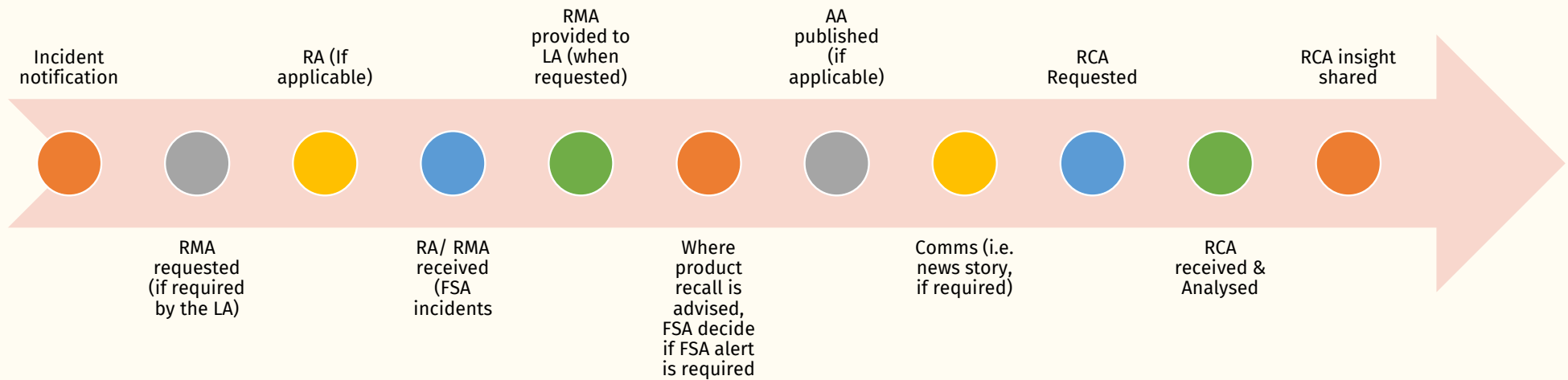
FSA Alerts Continued

- Once an FSA alert has been drafted, this will be emailed to the FBO and their LA to check for factual accuracy. A response is requested in 30 minutes.
- Lines on risk and hazards re not open for comment as a value, standard liens have been approved by risk managers and risk assessors.
- FBOs must comply with the legislative requirement to ‘accurately and effectively’ inform consumers about the reasons
- FBOs are encouraged to supply a Point-of-Sale Notice (POSN) to accompany the FSA alert which provides details of what products are to recalled, and an image of the product, which helps consumers relate to the product and accurately identify the product.
- Once cleared, the FSA alert is published on the FSA website and social media channels.





Allergy incident response





Traceability, withdrawals and recalls guidance

Our 'Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry' explains what the law requires and what businesses need to do. [Guidance on Food Traceability, Withdrawals and Recalls within the UK Food Industry](#)

- It includes advice and best practice on:
 - traceability systems
 - making a decision and carrying out a withdrawal or recall
 - roles and responsibilities
 - how to inform consumers of a food recall

Allergen Statistics

What percentage of allergen incidents lead to FSA allergy alerts?

Allergen Statistics

What percentage of allergen incidents lead to FSA allergy alerts? **32%**

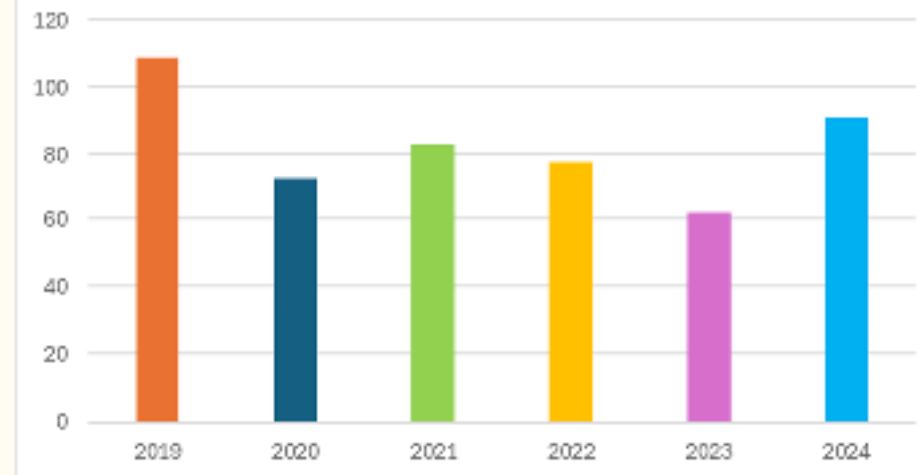
Allergen Statistics

Number of Allergy Alerts Issued by FSA and FSS

FSA	2019	2020	2021	2022	2023	2024
Incidents	109	73	83	78	62	91

- These figures show calendar year information
- Most allergen incidents do not result in an allergy alert.
- In the **financial year 2025/6**, there were 281 allergen incidents.
- 89 of these resulted in an allergy alert.

Number of Allergy Alert Issued by FSA and FSS

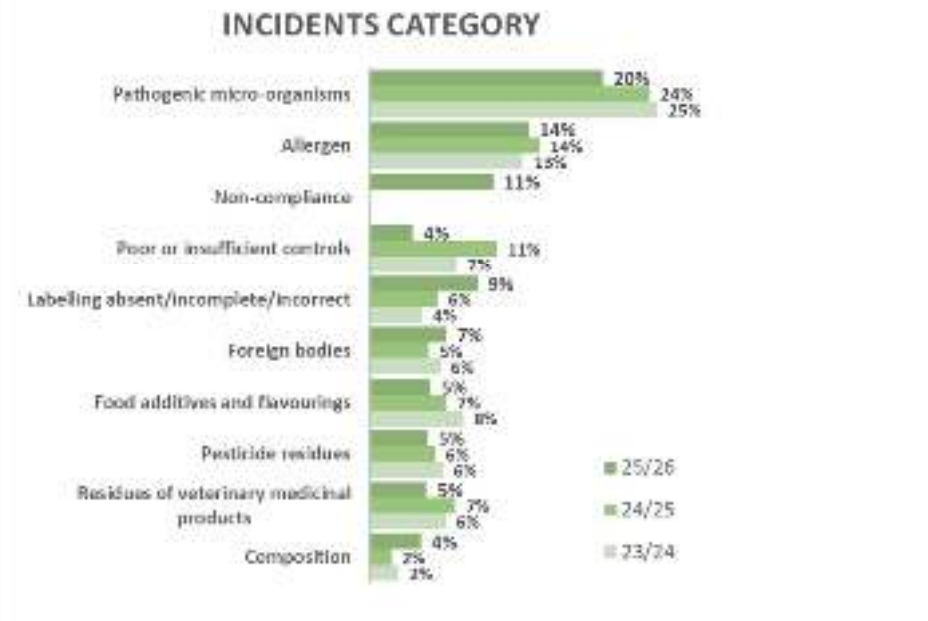


Insight to FSA Incident



- Link [Incidents & Resilience Annual Report 2025/26 | Food Standards Agency](#)

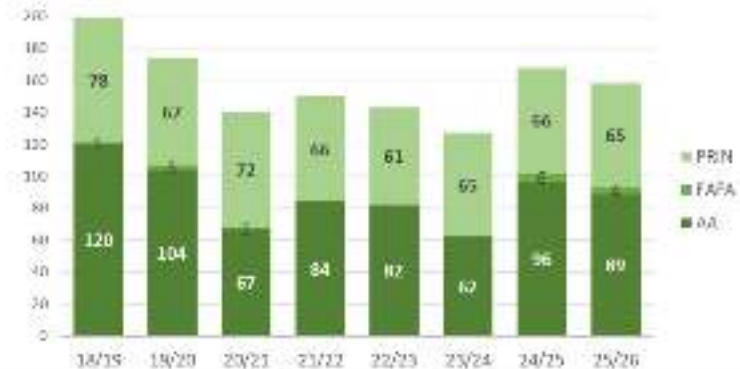
Figure A3: Top ten incident notification categories received during 2023/24 to 2025/26 reporting year, by incident type (percentages).



FSA TOTAL NUMBER OF INCIDENTS



FOOD ALERTS



Insight and learnings to FSA Incidents



Costa

- Remember to inform the FSA not just HSE.
- LAs should also investigate if there's a wider food safety risk
- Language barrier – is a hazard to be managed
- How does your FBOs franchise models work in making food safety decisions

Popcorn

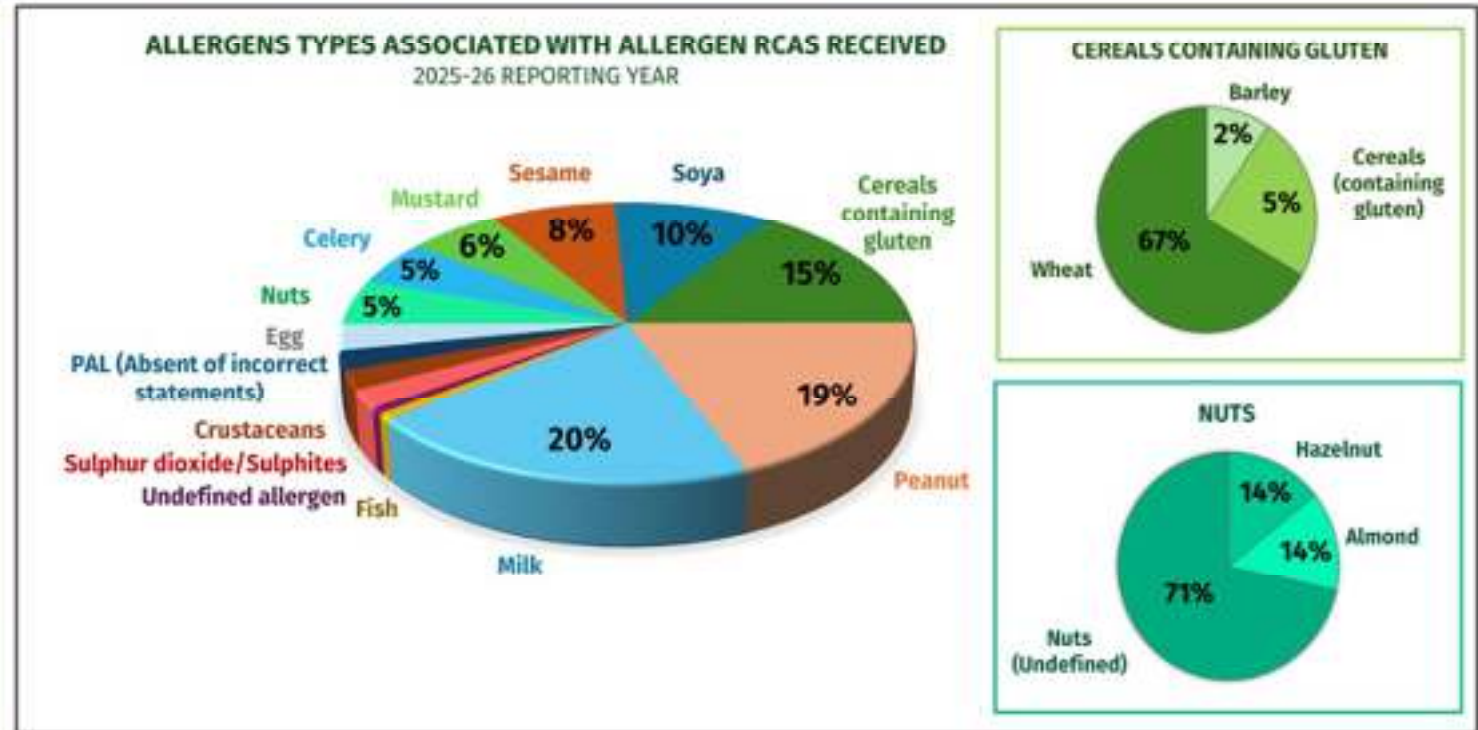
- Important of trace level contamination
- Not relying on sampling to 'prove safety' – allergen risk assessment and an allergen HACCP plan
- Who the lead LA is – when 'case' is in different LA, the production is in one LA, service in a another
- Role and independence of the PA – (when also the enforcing PA)
- Root cause- commercial documentation – an ingredient having a PAL, and the PAL 'dropped' without a RA
- Assumption that PAL means low levels, low risk – in fact it is it might or might not be there, PAL does not guarantee low level or safety

2025-26: INCIDENT RCAs - HAZARD TYPES

Milk **20%** peanut (**19%**) and cereals (containing gluten) (**15%**) remained the top RCA allergens – corresponding 2024-25 figures were **26%**, **14%** and **14%**.

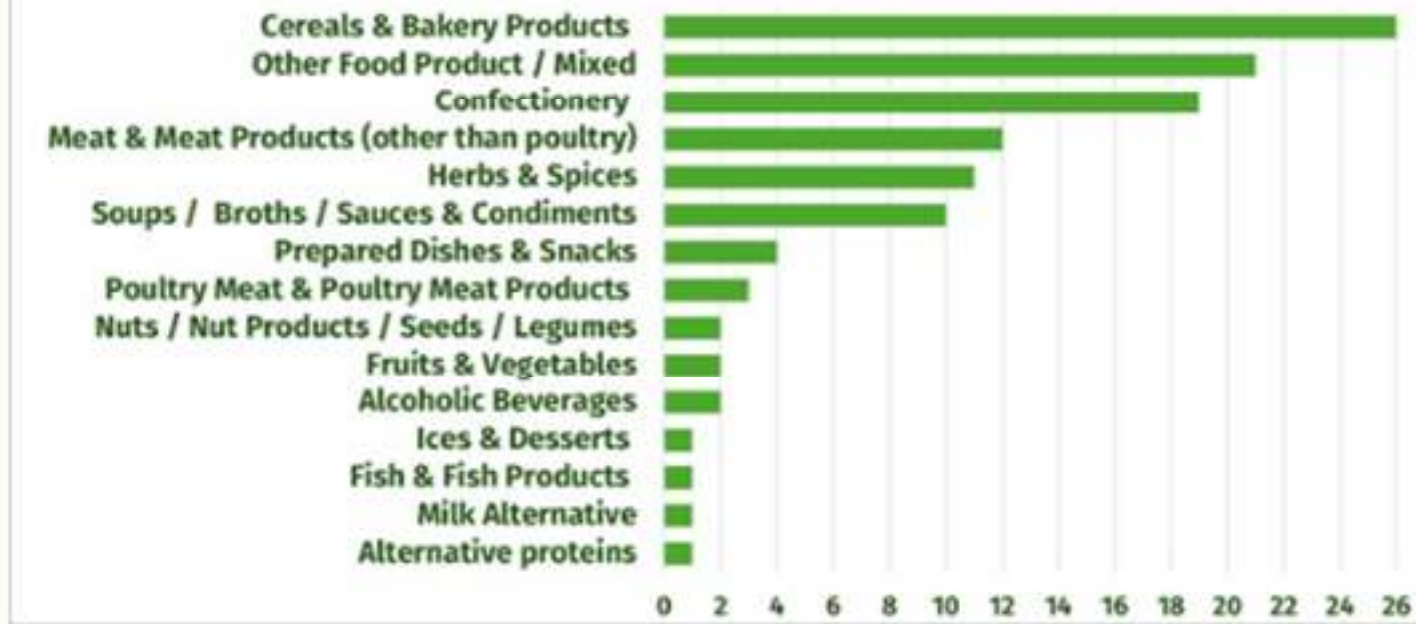
Wheat made up **67%** of the 'Cereals (containing gluten)' category, up from **40%** the previous year.

'Nuts' (undefined) rose to **71%** (from **32%** last year), whilst hazelnut and almond (both **14%**) halved from **28%** each in 2024-25.



Product Types associated with Allergen RCAs received

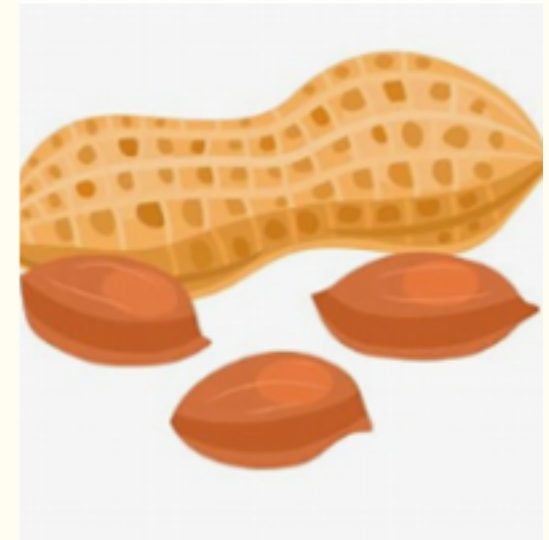
2025-26 Reporting Year



Peanut in mustard incident

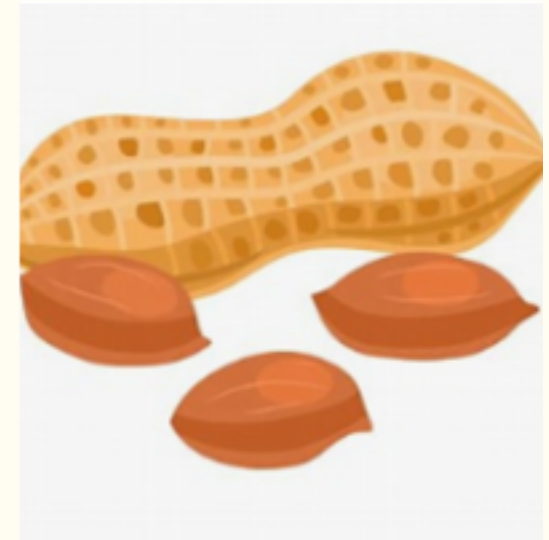


- In September 2024, the FSA and FSS conducted an investigation after a food business reported traces of peanut in mustard powder from a supplier.
- FSA worked closely with Local Authorities, Industry Trade Associations and industry members directly as well as with other government departments as well as international countries to determine the supply into the UK and the root cause of the peanut contamination in mustard.
- An exceptional approach was taken, in response to extraordinary situation, potential for system wide concern, and, high uncertainty
- Urgent allergy advice was published by the FSA advising those with peanut allergies to avoid consuming foods containing mustard, mustard powder or mustard flour whilst investigations were ongoing.



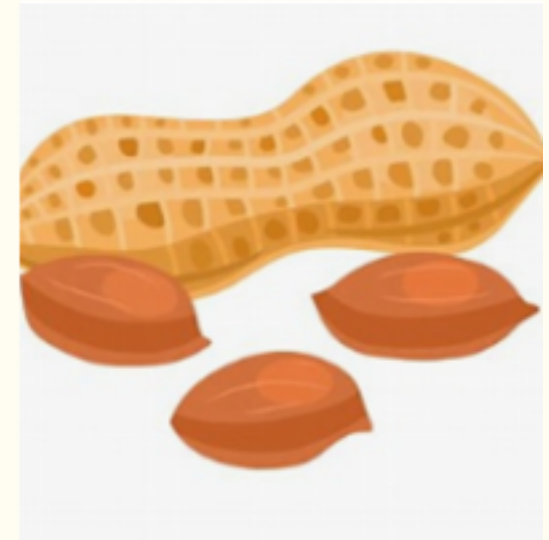
Peanut in mustard incident continued

- The investigation traced the contaminated mustard ingredients to four Indian suppliers and three spice companies in the UK, who distributed these ingredients to a range of manufacturing, hospitality and retail businesses, prompting product withdrawals and recalls across the supply chain.
- One retailer alone reported over 700 product lines were affected, early on in the incident
- Between September and November 2024, FSA and FSS published three allergy alerts and 31 follow up alerts affecting 59 brands and 307 products.
- In November 2024, after confirming that all necessary food safety measures were in place and affected products were removed from sale, the FSA and FSS lifted the precautionary advice.
- Enhanced testing of mustard products is now in place as a safeguard to ensure that any further products that may be affected by cross contamination do not reach the market, enabling consumers to enjoy these foods with confidence.



After the Peanut in mustard incident

- Root cause analysis requested – incorrect
- Root cause determined it was a field level cross contamination in India – not correct
- Correct RCA was process failure – their commercial specification checks had failed
- RCA subgroup created – led by an industry expert – Seasoning and Spice Association
- SSA developed a new risk assessment tool for industry, strengthening previous risk assessment tools
- IGD have also developed a risk assessment tool, further work has been undertaken recently, with imminent updates due, ingredient level risk assessment, and advice on lessons learned to be provided
- SSA developed and delivered a paper – industry view of the root cause and what occurred



Food Hypersensitivity

Food hypersensitivity in the FSA: Approach



Our aim is to improve the quality of life for people with a food hypersensitivity

Activity is targeted around 3 themes:



Safety: Improving understanding of FHS and the associated risks

Trust: Increasing business and consumer trust and confidence

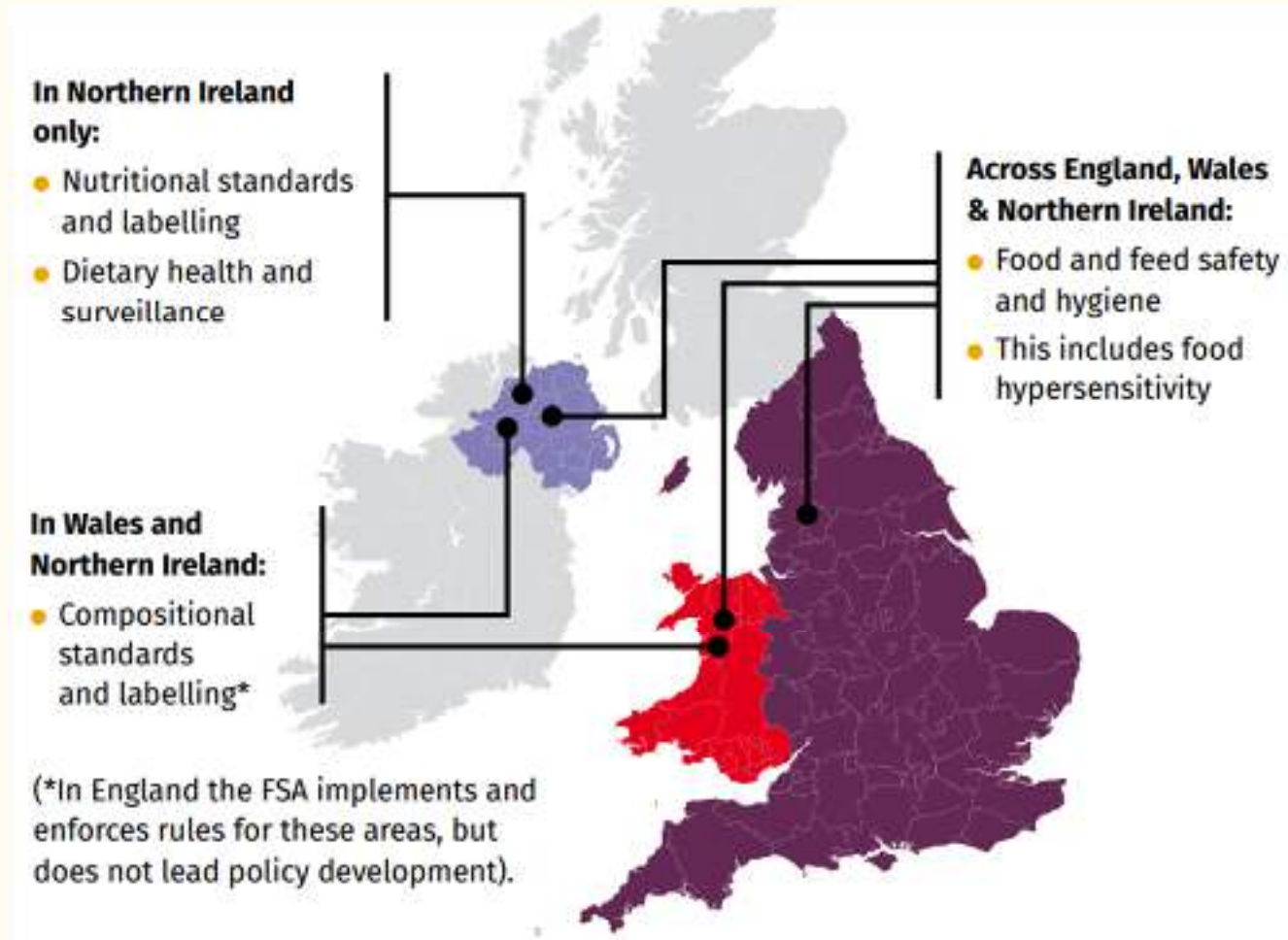


Choice: Ensuring that people with FHS are not unnecessarily excluded from participation in our food culture

Devolved responsibilities

Our areas of policy responsibility across England, Northern Ireland and Wales.

Although policy differs, the safety standards is harmonised



Legal Requirements



Food business operators (FBOs) in the **catering sector** are required to provide allergen information and follow labelling rules as set out in food law*

FBOs **must**:

- **provide information** on the **14 allergens** to the consumer for prepacked, prepacked for direct sale (PPDS) and non-prepacked food and drink
- **handle and manage food allergens effectively** in food preparation

It's important to remember that consumers may be allergic or have intolerance to other ingredients, but only the 14 allergens are required to be declared as allergens by food law

*Assimilated Regulation (EU) No 1169/2011 on the provision of food information to consumers

Best practice guidance – restaurants and takeaways



Out-of-home settings remain a key risk area for people with food hypersensitivity.

- March 2025 - the FSA published new best practice guidance for restaurants and takeaways.
- This recommends allergen information is provided in writing and supported by a verbal discussion to help consumers make safe choices.
- This guidance supplements existing legal requirements and provides flexible approaches for businesses, supported by free tools developed by the FSA.
- To help people make informed choices

<https://www.food.gov.uk/business-guidance/allergen-information-for-non-prepacked-foods-best-practice-summary>



Tools for FBOs - examples

FOOD MENU	Milk	Egg	Lupin	Sulphur Dioxide	Gluten	Celery	Crustaceans	Molluscs	Fish	Mustard	Soybean	Peanut	Sesame	Treenuts
Fish, bean and rice bowl Tilapia, black beans, slaw, guacamole and pickled onions	✓					✓			✓					
Seafood & Chorizo Paella Saffron rice, with chicken, prawns, clams and vegetables				✓			✓	✓						

Please talk to us if you have a food allergy, intolerance or coeliac disease.

We want to cater safely for everyone.





Next steps - Out of home food

- The impact of the guidance is currently being evaluated, findings expected early 2027.
- April 2026 - Minister Angela Eagle committed to making progress on legislation in this area. Following the appointment of Minister Morgan as Minister of State for Food Security and Rural Affairs (Defra), the FSA will continue to liaise closely with Defra to consider next steps.
- We will also continue to engage with local authorities and industry and provide updates at the earliest appropriate opportunity.





FSA Board View on PAL and allergen thresholds

- December 2025, the FSA Board agreed the UK should support Codex proposals on Precautionary Allergen Labelling (PAL), including the use of allergen thresholds (ED05), to improve consistency and clarity for consumers.
- This informed the UK's position at the Codex Committee on Food Labelling (CCFL49) in May 2026, where PAL guidelines were finalised and are expected to be formally adopted in July 2026.
- While PAL applies to prepacked foods, these developments are relevant to the wider allergen risk landscape.



The Codex Guidelines

- Introduce a risk-based framework for more consistent and evidence-based use of PAL
- Aim to reduce unnecessary or inconsistent ‘may contain’ labelling
- Clarified that PAL should not be used alongside “gluten-free” claims
- **For more information – codex guidance is publicly available (in draft)**

PAL Implications and next steps for the UK



- **The UK will review the policy and regulatory implications** of the Codex PAL framework, including alignment with reference doses and consider whether we would need to make any changes
- **Social research is underway** to better understand consumer communication needs and inform future messaging
- **The FSA continue to monitor international developments**, including early adopters such as the Netherlands and ongoing EU progress, and continue engagement with relevant Codex Committees to support alignment of PAL guidance



Industry Readiness for PAL

What the FSA has said to industry so far:

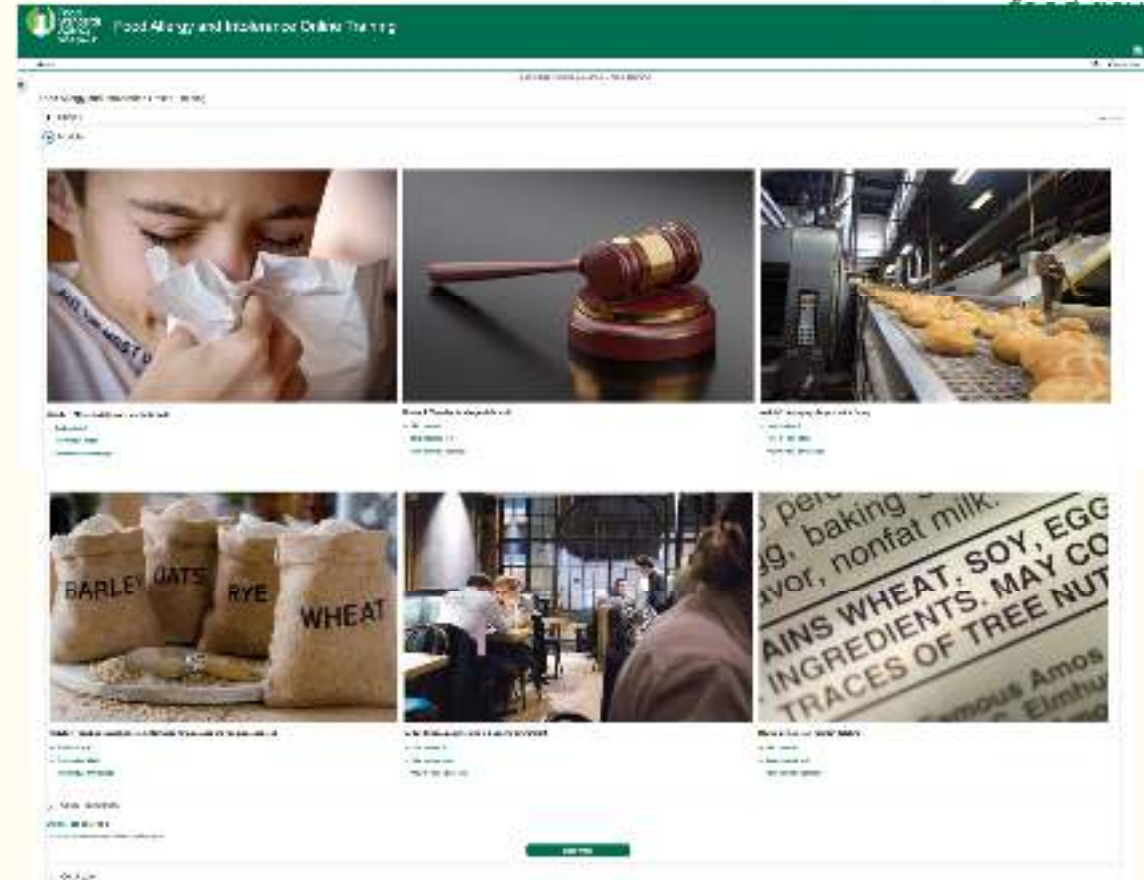
- Confirmed no immediate change
- FSA is supportive of industry efforts to improve allergen risk assessments, but cannot endorse third-party tools or templates
- Industry should not expect FSA-approved templates yet
- Positions may change, this is live policy development

Training

FBOs must make sure that staff receive training on allergens.

The FSA provides free **food allergy and intolerance online training** course on our website:

<https://allergytraining.food.gov.uk/>



Allergen Guidance for Institutional Caterers



<https://www.food.gov.uk/business-guidance/allergen-guidance-for-institutional-caterers>

The screenshot shows the top navigation bar of the Food Standards Agency website. It includes the agency logo, a search bar with the text 'Search Food Standards Agency', and a language selector set to 'English'. Below the navigation bar is a dark purple header with menu items: 'Home', 'News and alerts', 'Consumer advice', 'Business guidance', 'Our work', and 'About us'. The main content area has a white background with a left-hand sidebar. The sidebar contains a 'Home' link and an 'ON THIS PAGE' section with links for 'Care homes' and 'Schools'. The main content area features the title 'Allergen guidance for institutional caterers' in a large, bold, teal font. Below the title is a subtitle: 'Guidance on allergens for caterers in schools, hospitals and care homes.' The page also indicates it was last updated on 14 December 2017 and provides options to 'View as PDF' and 'Print this page'. A paragraph of text explains the responsibility of institutions to protect individuals with allergies or intolerances. A bulleted list at the bottom highlights key points: 'the rules surrounding allergens' and 'the institution's policy on [food allergen management](#)'.



Food Hypersensitivity Team

- Any questions on policy matters please feel free to email the team directly on

hypersensitivitypolicy@food.gov.uk



Iain Ferris
Jonathan Lighthill



LUNCH



Food Allergen Quiz



In the UK, there are approximately how many people affected by coeliac disease?

- **1 in 100 people**
- **1 in 1,000 people**
- **1 in 10,000 people**



You witness front service staff assembling sandwiches using ingredients from multiple containers holding different allergens without washing hands in between, This is an example of what kind of cross contamination:

- **Food to food**
- **Food to hand to food**
- **Food to equipment, utensils or surface/food cooked in same liquid**

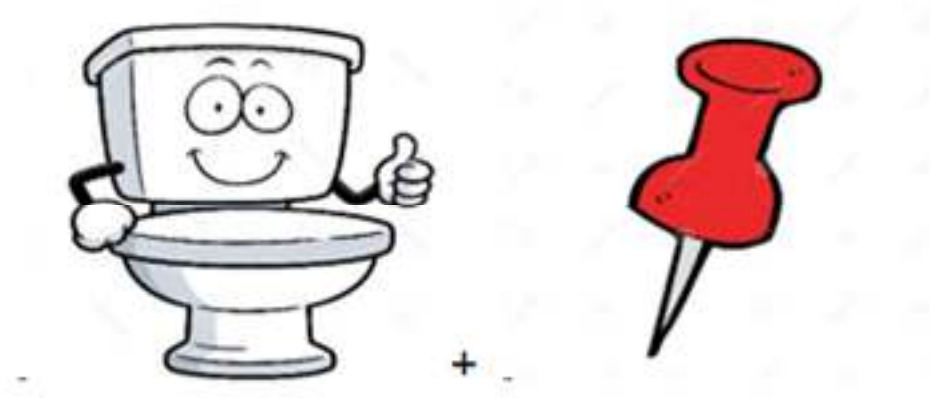


Which one is the odd one out?

- Coconut
- Cashew nut
- Almond
- Hazelnut



Which of the 14 allergens do these pictures represent?





When selling loose foods, it is a legal requirement to provide written allergen information in matrix form – true or false?

- **True**
- **False**



Which of the below would be considered food pre-packaged for direct sale (PPDS). Tick all that apply:

- **Food packed by a food business to be sold in the retail outlets within the same building e.g train station, university, hospital**
- **Butcher pre-packaging packs of burgers and sausages to be sold in the same shop**
- **Sandwiches made to order on customer's request at a takeaway sandwich shop**



You undertake an inspection of a food business and find there are several issues of concern with regards to allergen control.

Can you consider the allergen issues when scoring as part of the FHRs?

- **Yes**
- **No**
- **Maybe**



Where would you include the score for allergen issues?

- **Hygiene**
- **Structure**
- **Confidence in Management**



Which of the following should be included within the Food Hygiene Rating Scheme score? Choose one of the following:

- **The adequacy of allergen labelling on individual foods on display**
- **The adequacy of procedures to control cross contamination of foods with food allergens**
- **The adequacy of the emphasis given to food allergens in ingredients lists on food labels**



Let's see what you all decided



In the UK, there are approximately how many people affected by coeliac disease?

The correct answer is 1 in 100 people. Reference: allergytraining.food.gov.uk/

Explanation/useful links - Celiac disease is a serious auto-immune condition triggered by consuming gluten, which leads to damage of the gut lining. This has a severe impact on a person's ability to absorb nutrients from food. Gluten is a protein found in wheat, rye, barley, oats, spelt, and kamut (a commercial name for Khorasan wheat).

It is worth noting that oats do not naturally contain gluten. However, oats are often produced with other cereals containing gluten, which means there is a high risk of cross-contamination. Oats also contain avenin, which is a protein similar to gluten, but research has shown most individuals with coeliac disease can tolerate uncontaminated oats, although a small number may still be sensitive.



You witness front service staff assembling sandwiches using ingredients from multiple containers holding different allergens without washing hands in between, This is an example of what kind of cross contamination:

The correct answer is food to hand to food

Explanation/useful links: Allergen cross-contamination during preparation primarily occurs in the following ways:

Food to food: Example - By different foods touching or one food dripping onto another food.

Food to hand to food: Example - Cooking staff or front service staff using ingredients from multiple containers holding different allergens without washing hands in between, for example adding toppings to pizzas, or assembling sandwiches.

Food to equipment / utensils / surface to food

Example - Sharing of utensils, for example, using a whisk to stir a milk-based sauce and then using the same whisk to stir eggs, without thoroughly washing and drying the whisk between procedures. Using the same cutting board, griddle/frying pan, or other surface to prepare fish and shellfish.



Which is the odd one out

The correct answer is coconut.

Explanation/ useful links: Coconut is not included in the 'nuts' section on the list of 14 allergens. The rules list these as: almond, hazelnut, walnut, cashew nut, pecan nut, Brazil nut, pistachio nut, Macadamia nut or Queensland nut and products made from these nuts. The type of nut must be listed and emphasised in the ingredients panel. Other types of nuts, and other foods which are not nuts (even though they are called nuts i.e., chestnuts, pine nuts and coconut), are not named in the rules. Chestnuts, pine nuts, and coconut are also known to cause allergy in some people but must not be emphasised within the ingredients.

Reference: <https://www.food.gov.uk/node/19876?print=1>



Which of the 14 allergens do these pictures represent?

Lupin



When selling loose foods, it is a legal requirement to provide written allergen information in matrix form – true or false?

The correct answer is False.

Reference: FSA's Food allergy and intolerance advice for consumers www.food.gov.uk/print/pdf/node/22261(opens in new window)

Allergens - Local Authority Q&A

V2 [www.abcfoodlaw.co.uk/files/documents/Allergens+LA+Q&A+-+Version+2%20\(1\).pdf](http://www.abcfoodlaw.co.uk/files/documents/Allergens+LA+Q&A+-+Version+2%20(1).pdf)



Which of the below would be considered food pre-packaged for direct sale (PPDS). The correct answer is:

**Food packed by a food business to be sold in the retail outlets within the same building e.g train station, university, hospital
& Butcher pre-packaging packs of burgers and sausages to be sold in the same shop.**

Explanation/useful links:

Criteria 1 – Is the food presented to the consumer in packaging?

Criteria 2 – Is the food packaged before the consumer selects or orders it?

Criteria 3 – Is the food packaged at the same place it is sold

FSA definition “PPDS food is food that is packed before being offered for sale by the same food business to the final consumer: i) on the same premises; or ii) on the same site; or iii) on other premises if the food is offered for sale from a moveable and/or temporary premises (such as marquees, market stalls, mobile sales vehicles) and the food is offered for sale by the same food business who packed it.”



Can you consider the allergen issues when scoring as part of the FHRs?

The correct answer is Maybe.

Explanation/useful links:The Food Hygiene Rating Scheme is specifically designed to provide consumers with information about hygiene standards found at the time of an inspection. The scope of the scheme does not include compliance with the Food Information Regulations 2014 or Regulation (EU) No 1169/2011 on the provision of food information to consumers (FIC).

The Food Law Code of Practice - Practice Guidance is clear on this matter, and states: “The provisions on allergens in the Food Information Regulations 2014 relate to food labelling and information so should not form part of this assessment since these are food standards requirements.”

The failure to comply with the requirements of the FIC Regulations should not impact on the hygiene intervention rating and subsequently the food hygiene rating.

However, the overall level of compliance and performance of the business against food hygiene requirements should be taken into account.



Where would you include the score for allergen issues?

The correct answer is Confidence in Management.

Explanation Useful links: The England and Northern Ireland Practice Guidance also states that: “Consideration of the control of cross-contamination, including any allergen related contamination identified in preparing food specifically for consumers with a food allergy or intolerance, should be part of the general assessment of hygiene procedures during a food hygiene inspection.

Reference: Allergens - Local Authority Q&A

V2 [www.abcfoodlaw.co.uk/files/documents/Allergens+LA+Q&A+-+Version+2%20\(1\).pdf](http://www.abcfoodlaw.co.uk/files/documents/Allergens+LA+Q&A+-+Version+2%20(1).pdf)



Which of the following should be included within the Food Hygiene Rating Scheme score?

The correct answer is The adequacy of procedures to control cross contamination of foods with food allergens.



Do you know the answer to this joke?

Why did the man with a wheat allergy eat bread?



The correct answer is:
He was a gluten for punishment.

**Understanding Allergen Labelling
Requirements for
Prepacked and PPDS foods
Rachael Sawtell & Chris Filmer**



Why Accurate Allergen Labelling Matters More Than Ever

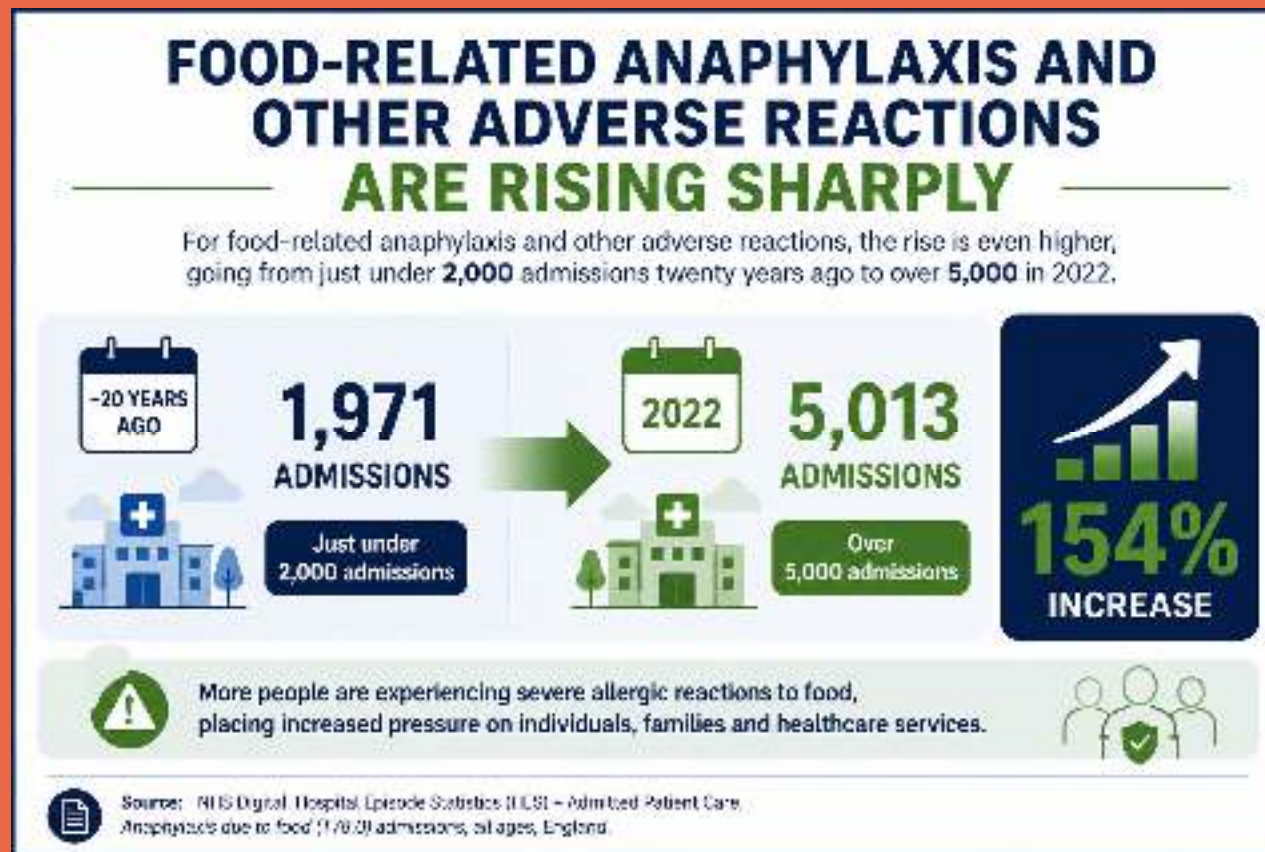
Scale of food hypersensitivity in the UK



Why Accurate Allergen Labelling Matters More Than Ever

Severity of allergic reactions.

Highlighting the Importance of Reliable Allergen Information.



Labelling Requirements for PPDS and Non-prepacked Foods

- **Prepacked for direct sale (PPDS) foods**

Must provide:

- Name of food
- An ingredients list including the 14 mandatory allergens
- (in order of weight)
- Allergens emphasised every time they appear in the
- ingredients list

- **Non-prepacked foods**

- Allergen information must be available and accurate
- FSA's Allergen Information for Non-prepacked Foods Best Practice

Chicken Bacon & Lettuce Sandwich

INGREDIENTS: Wheat Flour [**Wheat** Flour, Calcium Carbonate, Iron, Niacin, Thiamin], Chicken Breast (23%), Water, Smoked Bacon (12%) [Pork Belly, Sugar, Salt, Stabilisers (Pentapotassium Triphosphate, Pentasodium Triphosphate), Antioxidant (Sodium Ascorbate), Honey, Preservative (Sodium Nitrite)], Lettuce, Malted **Wheat** Flakes, Rapeseed Oil, **Wheat** Bran, Cornflour, Spirit Vinegar, Yeast, Malted **Barley** Flour, Pasteurised **Egg**, Emulsifiers (Mono- and Diglycerides of Fatty Acids, Mono- and Diacetyl Tartaric Acid Esters of Mono- and Diglycerides of Fatty Acids), **Wheat** Gluten, Pasteurised **Egg** Yolk, Malted **Wheat** Flour, Concentrated Lemon Juice, Yeast Extract, Onion Powder, Black Pepper, Flour Treatment Agent (Ascorbic Acid), Palm Oil, Brown **Mustard** Seeds, Maltodextrin, Mushroom Extract Powder, Lemon Juice Powder.

Labelling Requirements Prepacked Foods

- **Prepacked foods** Must provide:
 - Name of food
 - Ingredients list (in order of weight from largest to smallest)
 - QUID where required
 - 14 allergens emphasised in ingredients list
 - Net quantity
 - Storage conditions and date labelling 'best before' or 'use by'
 - Name and address of manufacturer
 - Country of origin (where applicable)
 - Preparation instructions (if needed)
 - Nutritional declaration
 - Additional labelling requirements for certain food and drink products



NUTRITIONAL INFORMATION

Typical values	Per 100g
Energy	229 kJ / 55 kcal
Fat	2.5g
- of which saturates	0.2g
Carbohydrates	6.8g
- of which sugars	5.4g
Protein	0.9g
Salt	0.5g

Mistake 10: Allergens not emphasised correctly

Natasha's Law requires the 14 allergens to be clearly emphasised within the ingredient list.

- Businesses commonly:
 - use plain text only
 - highlight inconsistently
 - bold some allergens but not others
 - use colour alone for emphasis (not enough)
- **Incorrect**
- Wheat flour, milk powder, egg
- **Correct**
- **WHEAT** flour, **MILK** powder, **EGG**

Ingredients: White bread (wheat flour, water, yeast, salt), cooked chicken breast (chicken breast, water, salt), mayonnaise (rapeseed oil, water, egg yolk, spirit vinegar, sugar, salt, mustard), lettuce.

MISTAKE 9

SUPPLIER SPECIFICATIONS NOT CHECKED



Businesses trust packaging **without** verifying allergen specs.



We trust the supplier.



PROBLEMS ARISE WHEN:

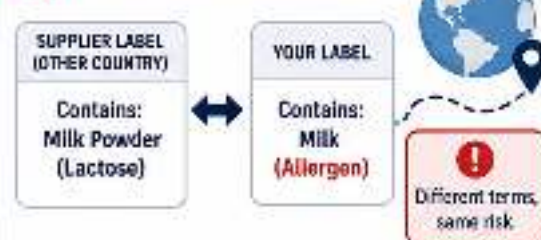
1. SUPPLIERS REFORMULATE PRODUCTS



2. INGREDIENT SHEETS ARE OUTDATED



3. IMPORTED INGREDIENTS USE DIFFERENT TERMINOLOGY



Failure to verify supplier specifications can lead to **mislabeled**, allergen incidents, recalls, legal action, and loss of consumer trust.



Mistake 8: Recipe changes not reflected on labels

- Very common in cafés, bakeries, delis, and sandwich shops.

Examples:

- supplier changes bread recipe
- chef swaps sauce brand
- seasonal specials altered
- substitute ingredients used during shortages

But labels stay unchanged.

- This creates one of the biggest legal risks because:
 - the label becomes inaccurate immediately
 - “temporary substitutions” are still legally required to be declared

Mistake 7: Using contains statements without full ingredients

- A major misunderstanding.
Some businesses think this is compliant:
Contains: Milk, Egg, Wheat
- But PPDS foods require:
the full ingredient list
AND
allergens emphasised within it
- A “contains” box alone is not enough



MISTAKE 6:

NO DOCUMENTED ALLERGEN PROCESS



Businesses often:

<p>1. RELY ON "EXPERIENCED STAFF"</p>	<p>2. HAVE NO VERSION CONTROL</p>	<p>3. KEEP RECIPES IN NOTEBOOKS OR MEMORY</p>	<p>4. LACK SIGN-OFF PROCEDURES</p>
<p>✗ Not a reliable allergen control.</p>	<p>✗ Outdated or conflicting information may be used.</p>	<p>✗ Hard to verify. Easy to forget. Easy to get wrong.</p>	<p>✗ No accountability. No formal approval. High risk.</p>



Without a documented allergen process, mistakes go unnoticed and risks go uncontrolled.



Mistake 5: Precautionary allergen statements used incorrectly

Businesses often overuse precautionary allergen statements.

- “May contain nuts” added to everything
- Blanket statements used instead of risk assessment

What’s needed

- Evidence-based allergen controls
- Genuine cross-contamination assessment

Over-warning can:

- Restrict allergic consumers unnecessarily
- Undermine label credibility

Mistake 4: Incorrect PPDS Classification

- Businesses often:
 - Assume products are non-prepacked when they are PPDS
 - Assume products are PPDS when they are actually prepacked
- Examples:
 - Sandwiches wrapped before customer selects them
 - Cakes boxed on-site before sale
 - Salads prepared and packaged in advance
 - Burger packed under a hot lamp before it is sold
 - Bags that are folded over or twisted or boxes that have tabs



Planglow

Mistake 3: Missing Ingredients

High Risk

Allergens can be omitted
completely

Tuna Sweetcorn

Light Tuna, Belly Tuna Light, Sunflower Oil, Salt, Sweetcorn, Organic Sweetcorn, Water, Sea Salt, Red Onion, Roast Red Peppers, Peppers, Water, Red Wine Vinegar, Oil, Grape Must, Mayonnaise (Rapeseed Oil, Water, Sugar, Modified Malt Starch, **Free Range Egg Yolk**, Stabilisers, Xanthan Gum, Salt, Preservatives, Acetic Acid, potassium Sorbate, Colour, Lactate, Salt, Peppers, Tomato, Cucumber and Mixed Salad Leaves

Keep refrigerated below 1°C
and 4°C
Product Use By
Date On 6-28

Mistake 2: Missing Allergens in Ingredients Lists

This is the biggest and most serious issue

- Businesses often:
 - forget to include a minor ingredient
 - omit “compound ingredients” (e.g. mayonnaise, pesto, curry paste)
 - miss allergens hidden inside sauces or garnishes
- **Common examples**
 - Milk not declared in buttered bread
 - Mustard omitted from mayo-based fillings
 - Sesame missed from burger buns
 - Sulphites overlooked in chutneys or pickles
 - Nuts hidden in pesto or dressings



Mistake 1: Labels too small or unclear

- Common non-compliance points:
 - tiny font sizes
 - poor contrast
 - labels obscured by condensation
 - curved packaging making text unreadable
- Natasha's Law requires labels to be:
 - easy to read
 - clear
 - legible



The Biggest Operational Risks



From a practical perspective, the three most dangerous mistakes are:

- Recipe substitutions not updated on labels
- Missing allergens in compound ingredients
- Incorrect understanding of what counts as PPDS



These are the areas most likely to lead to serious incidents.

What good operators do differently

- The strongest Natasha's Law compliance systems usually include:
 - Central recipe management
 - Single source of truth
 - Controlled recipes
 - Supplier approval process
 - Approved supplier specs
 - Automated allergen matrices
 - Digital label generation
 - Controlled recipe change approval
 - Routine allergen audits



What Good Operators do Differently

Planglow Ltd

Top 10 allergen labelling issues we see in food businesses

Does this reflect what you're seeing in inspections?

1. Labels too small or unclear
2. Missing allergens in ingredients lists
3. Missing ingredients
4. Incorrect PPDS classification
5. Precautionary allergen statements used incorrectly
6. No documented allergen process
7. Using contains statements without full ingredients
8. Recipe changes not reflected on labels
9. Supplier specifications not checked
10. Allergens not emphasised correctly

Future Challenges and Discussion

Nearly 5 years
on from
Natasha's Law
– where are
the remaining
challenges?

- Small business compliance
 - How can regulators encourage compliance without creating disproportionate burden?
- PPDS classification disputes.
- Maintaining accurate ingredient information when suppliers change.
- Ensuring allergen information remains accurate after recipe reformulation.

Are enforcement issues now more about systems and controls than awareness of the legislation?

rachael.sawtell@planglow.com
chris.filmer@planglow.com

info@planglow.com



Comfort Break



DIGITAL TOOLS TO SUPPORT PROVISION OF FOOD INFORMATION

**BRIDGING THE GAP BETWEEN
INDUSTRY & ENFORCEMENT**



nutritics.com

MY JOURNEY IN FOOD SAFETY

& WHY I BELIEVE SMART TECH IS KEY TO SAFER, MORE INCLUSIVE HOSPITALITY

- Registered Public Health Nutritionist, with a special interest in food law
- Former Technical Executive at the Food Safety Authority of Ireland
- Previously permanent Irish representative at the European Commission
- Director of Scientific & Regulatory Affairs at Nutritics
- Over 10 years answering technical queries from food businesses



As EHOs or Industry QA Specialists, you look at a food label or a recipe matrix and you have to ask a fundamental question

Is this accurate, how was it generated?

Accurate food labelling leaves no room for guesswork

Today, we're going to look at data gaps where compliance breaks down, and how we can use digital logic to spot them instantly.

We'll be covering -

- Providing food information on labels
- Nutrient Calculations
- Allergen Management



WHY ARE ALLERGEN DECLARATIONS SO IMPORTANT?

Food hypersensitivity results in a reduced quality of life greater than all other foodborne diseases combined

Every

40

minutes, a person is hospitalised due to a food allergy in the UK

Over

30%

of food businesses report difficulties maintaining allergen information

1 in 3

allergy sufferers receive incorrect food information

While 14 allergen categories are mandated - we have identified almost **800 ingredients** linked to these mandated allergens



WHO ARE NUTRITICS?

Nutritics is an award-winning food technology provider that transforms complex food data into clear, actionable insights for the foodservice and hospitality industry.

By automating the flow and transformation of food information from the supply chain through to the consumer, we remove significant manual burden and layer on top enhanced and automated validations.

Food impacts everyone, everywhere, everyday

Nutritics supports food businesses to ensure that every menu item is built with trustworthy data, enabling operators to scale their business with confidence.

130K+
Customers

3M+
Foods

150+
Countries

WHAT DO WE DO?



SOURCE

Supplier portal & validation checks

MANAGE

Build recipes, menus & dashboards

COMMUNICATE

Ordering, digital/print menus, and labels



UNDERLINED BY FOOD LAW & COMPLIANCE BY DEFAULT



PROVIDING FOOD INFORMATION

Labelling



nutritics.com



INFORMATION EXPECTATIONS BY FOOD TYPE

PRE-PACKED

Any item packaged before being sold to the consumer.



FOOD INFORMATION REGULATIONS 2014 - ASSIMILATED REGULATION (EU) NO. 1169/2011

PRE-PACKED FOR DIRECT SALE (PPDS)

Foods packed on site before being selected



**ENGLAND: SI 2019/1218 - WALES: WSI 2020/295 - N. IRELAND: SR 2020/80 - SCOTLAND: SSI 2021/70
UK NATASHA'S LAW**

NON PRE-PACKED FOODS

Foods sold loose or directly prepared for the consumer



**FSA ALLERGEN GUIDANCE UPDATE
CALORIE LABELLING - LARGE BUSINESSES**



LABELLING COMPLIANCE CHECKLIST

PREPACKED

Can you name up to 12 food labelling elements that could be on a prepacked food label?

Criteria Checklist	Yes
1. Name	<input checked="" type="checkbox"/>
2. Allergen Information	<input checked="" type="checkbox"/>
3. List of Ingredients	<input checked="" type="checkbox"/>
4. Quantity of Certain Ingredients Declaration (QUID)	<input checked="" type="checkbox"/>
5. Net Weight	<input checked="" type="checkbox"/>
6. Date of Minimum Durability or 'Use by' Date	<input checked="" type="checkbox"/>
7. Nutrition Declaration	<input checked="" type="checkbox"/>
8. Special Storage Conditions or Conditions of Use	<input checked="" type="checkbox"/>
9. Name and Address of the Food Business	<input checked="" type="checkbox"/>
10. Country of Origin or Place of Provenance	<input checked="" type="checkbox"/>
11. Instructions for Use	<input checked="" type="checkbox"/>
12. Alcohol content	<input type="checkbox"/>

1 Banana, Berries, Cashew & Yoghurt Smoothie

2,3,4 **INGREDIENTS:**
Bananas (38%), Freshly Squeezed Orange Juice (20.9%), Greek Style Yoghurt (17.1%) (MILK), Strawberries (15.2%), Blueberries (3%), **Cashew Nuts (3%) (Tree nuts)**, Honey (2.7%)
ALLERGY ADVICE: For allergens, see ingredients in **Bold**

5 250g Net Weight

6 Use by: 4th July 2025

7

NUTRITION INFORMATION TYPICAL VALUES	
Nutrient	per 100g
Energy	418kJ/99kcal
Fat	2.3g
of which saturates	1.5g
of which monounsaturates	1.2g
of which polyunsaturates	6.3g
Carbohydrate	14g
of which sugars	10g
of which polyols	0g
of which starch	1.2g
Protein	2.3g
Salt	0.03g

8 Storage Conditions: This is a fresh product that must be kept refrigerated 0 - 5 degrees Celsius before and after opening. Once opened consume within 2 days. Do not exceed the use by date.

9 Produced by Nutritics Ltd, Swords, Dublin, Ireland

10

11 Instructions for Use: Best consumed chilled. Shake before consuming.



LABELLING COMPLIANCE CHECKLIST

PPDS/GRAB & GO

Can you name the 3 labelling elements required on PPDS labels?

Criteria Checklist
1. Name
2. Allergen Information
3. List of Ingredients
4. Quantity of Certain Ingredients Declaration (QCID)
5. Net Weight
6. Date of Minimum Durability or 'Use by' Date
7. Nutrition Declaration
8. Special Storage Conditions or Conditions of Use
9. Name and Address of the Food Business
10. Country of Origin or Place of Provenance
11. Instructions for Use
12. Alcohol content



NAME OF FOOD



The name of a food product must be clear, accurate, and not misleading. Depending on the type of food, one of the following naming conventions must be used.

- **Legal name** If a name is prescribed by law (e.g., “milk chocolate” must meet specific cocoa content requirements), it must be used.
- **Customary name** If there is no legal name, a widely recognised name (e.g., “BLT” for a bacon, lettuce, and tomato sandwich) may be used.
- **Descriptive name** If neither a legal nor customary name applies, the name must accurately describe the food so consumers can understand what it is and distinguish it from similar products.



Nutritics enables users to input the appropriate legal name of the food and add descriptions when necessary.

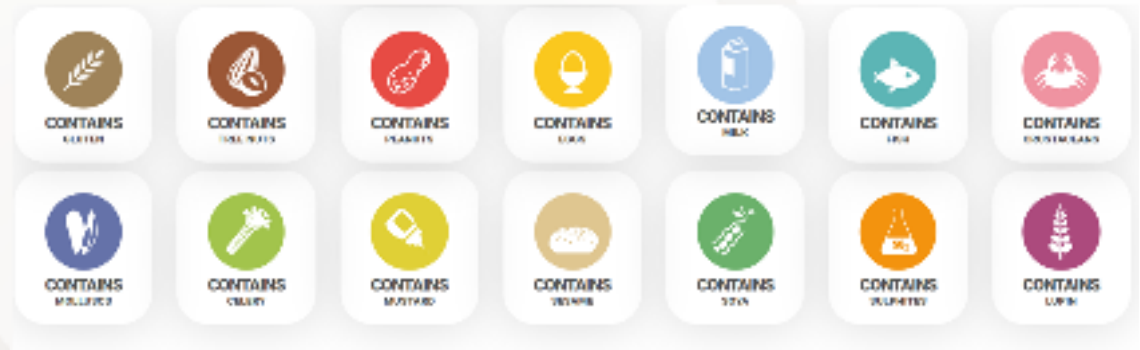




ALLERGEN INFORMATION

The 14 major allergens must be declared in the ingredient list and clearly highlighted (e.g., **bold**, CAPITAL LETTERS, underlining, or colour) to ensure consumer safety, as required by Article 9 of Regulation (EU) No. 1169/2011 (FIC).

- **For prepacked foods and PPDS foods**, a full ingredient list with **allergens** highlighted must be displayed on the packaging. Allergens must be highlighted within the ingredient list using **bold**, CAPITAL LETTERS, underlining, or colour.
- **For non-prepacked foods**, allergen information must be *easily accessible* to consumers when purchasing.



INGREDIENT LIST

The ingredient list must include all ingredients in descending order of weight and be headed with the word "Ingredients", as required by Article 18 & 22 of Regulation (EU) No. 1169/2011 (FIC) and Regulation 7 of the FIR (2014). This ensures transparency and helps consumers make informed choices about the products they purchase..

Food labels must be easy to read, follow legal formatting requirements, and be permanently visible to protect consumers and comply with regulations. Information must be permanently visible and remain legible throughout the product's shelf life.



NUTRIENT CALCULATIONS



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WHAT IS THE GOLD STANDARD FOR RECIPE CALCULATION?

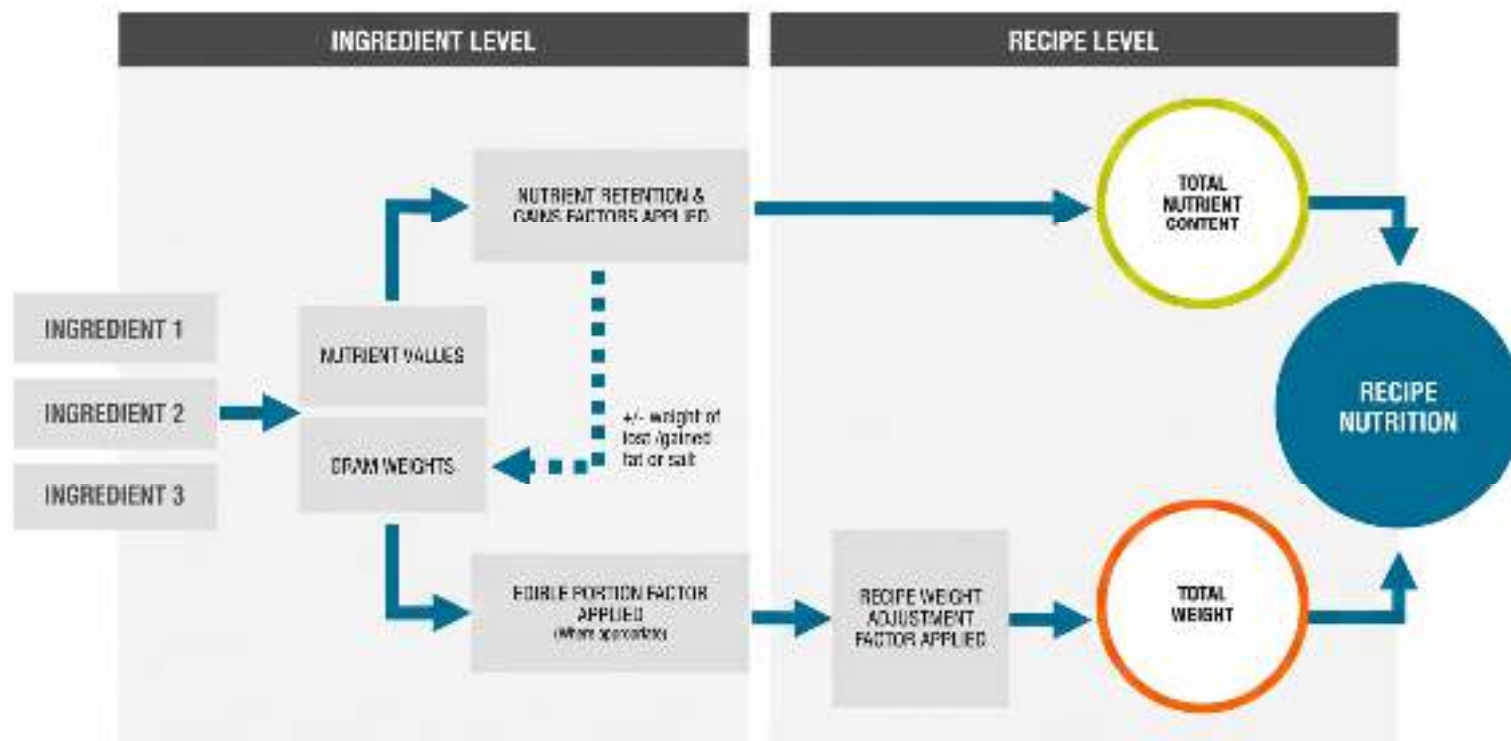
Nutritics is the only software solution globally to achieve [EuroFIR's Gold Standard for Recipe Calculation Methods](#), following a rigorous 86-point evaluation under the H2020-funded NASCENT project (Grant Agreement No. 739622).

EuroFIR (European Food Information Resource AISBL) introduced this certification to ensure software providers meet the highest quality standards when using validated food composition data.



Nutritics is the only software solution globally to achieve EuroFIR's Gold Standard for Recipe Calculation Methods, following a rigorous 86-point evaluation under the H2020-funded NASCENT project (Grant Agreement No. 739622).

HOW IS FOOD INFORMATION CALCULATED ON RECIPES



Recipe calculations need to be completed on all sub-recipes and recipes for accuracy.

WHY DO RECIPE CALCULATIONS NEED TO BE ACCURATE?



Declared nutrient values should fall within the European Commission nutrient tolerance ranges used by UK enforcement authorities

Nutrient	Tolerance
Carbohydrate, Sugars, Protein, Fibre	<10 g/100 g: ± 2 g; 10–40 g/100 g: $\pm 20\%$; >40 g/100 g: ± 8 g
Fat	<10 g/100 g: ± 1.5 g; 10–40 g/100 g: $\pm 20\%$; >40 g/100 g: ± 8 g
Saturates, Mono-unsaturates, Polyunsaturates	<4 g/100 g: ± 0.8 g; ≥ 4 g/100 g: $\pm 20\%$
Sodium	<0.5 g/100 g: ± 0.15 g; ≥ 0.5 g/100 g: $\pm 20\%$
Salt	<1.25 g/100 g: ± 0.375 g; ≥ 1.25 g/100 g: $\pm 20\%$
Vitamins	+50% / -35%
Minerals	+45% / -35%

THE UNDERLYING DATA SOURCES ARE KEY



NATIONAL FOOD COMPOSITION DATABASES (FCDBS)

Average values from market sampling

Comprehensive, nationally accepted, calorie labels

Average, specific brand/recipe may differ, not all foods available

MANUFACTURER DATA

Ingredients, batch info, allergens

Product-specific, ready access

Lacks micronutrient detail

LABORATORY ANALYSIS

Direct nutrient measure

Highly accurate, required for claims (gluten-free)

Expensive, selected samples only, only representative of sampled recipe which may vary



Food companies should know understand their underlying data source and the process for updates *e.g. reformulation, allergens.*

& TO ADD IN ADDITIONAL COMPLEXITY...

BATTERED FOODS



DEEP-FRYING



DRIED FOODS



MARINADES



REDUCTIONS, BROTHS



WATER ABSORPTION / BOILING



Recipe calculations need to take these factors into account - otherwise they may be outside of tolerance for non-compliance.

SAMPLE CHECKLIST

Recipe & Ingredients

- Complete, current recipe available
- Ingredients clearly identified (supplier/brand/spec)
- Allergen + nutrition specs present
- Allergens are declared

Quantities & Serving Size

- Accurate quantities (prefer g/kg)
- Correct unit conversions
- Serving size is realistic (*below 50g or above 500g may need to be checked*).

Cooking & Yield

- Cooking method specified and factor used correctly (*NB for calorie labelling*).
- Yield weight measured
- Processing losses/gains included

Calculation Method

- Approved software/database used
- Correct ingredients selected (*e.g. raw vs cooked ingredients*).
- Yield + serving size correctly applied

Nutrition Declaration

- Per 100 g / 100 ml used
- Mandatory nutrients included
- Rounding applied correctly
- Energy/calories are realistic (*below 50kcal or above 500kcal/100g may need to be checked*).

Plausibility & Compliance

- Values consistent with recipe composition
- No missing key ingredients
- Claims supported and compliant

Traceability

- Recipe, specs, and calculation report available
- Full data traceability + version control

4

KEY FOOD INFORMATION CHALLENGES TODAY & HOW WE ARE APPROACHING THEM



1

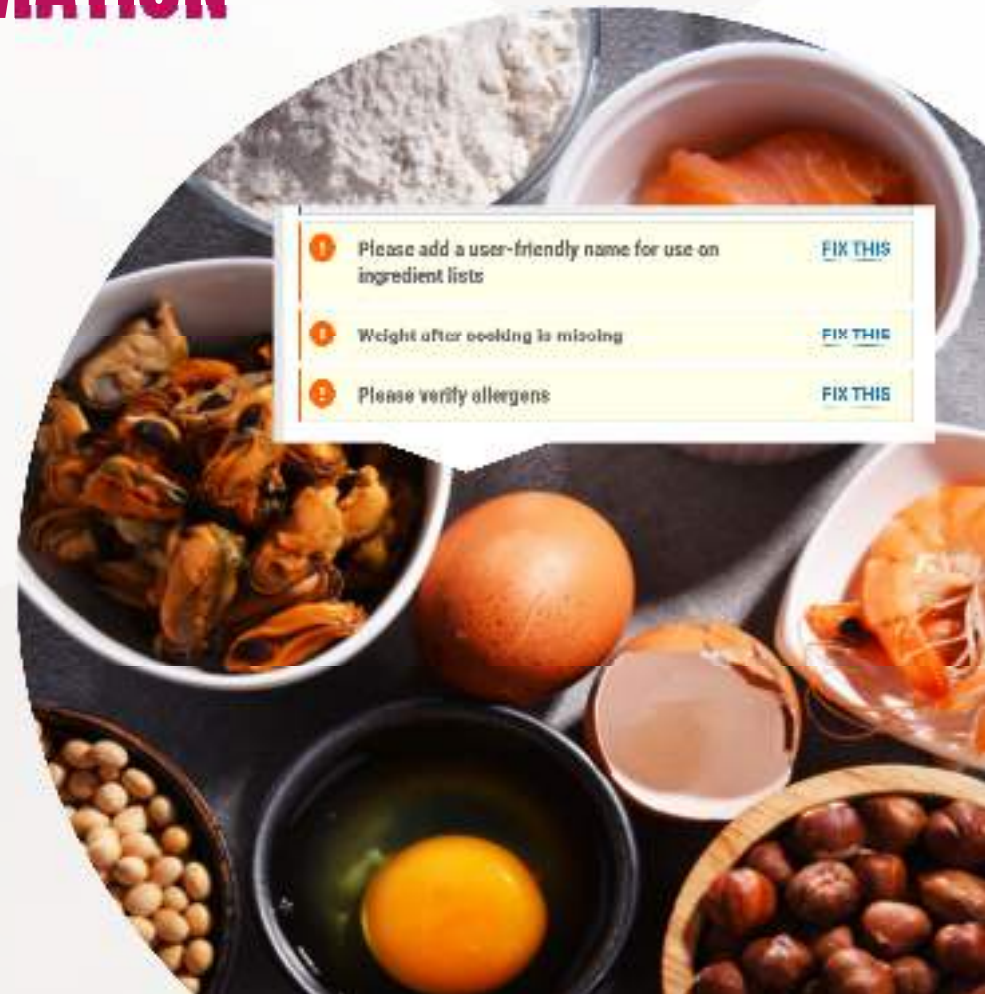
SOURCING RELIABLE INFORMATION

The Compliance Challenge:

Getting accurate allergen data from suppliers is challenging, with many businesses still making mistakes despite a decade of mandates.

- **Validation:** 20+ checks on each food, prompts on recipes & labels.
- **Automated Checks:** The system uses a 2-step verification process to centralise and check incoming supplier data. If an ingredient changes, a "replace all" function updates it everywhere instantly.

In 2024 Nutritics onboarded 500+ suppliers and validated over 2.5 million allergens across almost 74,000 products



- 1 Please add a user-friendly name for use on ingredient lists [FIX THIS](#)
- 2 Weight after cooking is missing [FIX THIS](#)
- 3 Please verify allergens [FIX THIS](#)



2 SUPPLY CHAIN DISRUPTION & DUE DILIGENCE

The Compliance Challenge:

Changes in supplier ingredients e.g. stock substitutions and multiple formulas used in the production kitchen can introduce risk to consumers.

- **Real-Time Sync:** When a supplier changes a formula, the user gets an instant alert. Once the new ingredient enters the kitchen, the user can accept the change and use a "replace all" function to update every menu and label instantly, ensuring the customer always sees exactly what is on their plate.
- **Spotting Hidden Risks:** An automated scanner checks for gaps and mistakes across the 14 mandated allergens, cross-checking product name, with ingredient list etc

Menus & labels should be updated in real-time - if ingredients change in the kitchen, the customers should see accurate information based on what's on their plate/in their bag





3

NEW REGULATIONS & PLANT BASED RISK



The Compliance Challenge:

Food businesses face tighter laws around digital menus and non-prepacked foods, alongside growing confusion around "vegan" vs. "allergen-free" labelling.

- **Legal Alignment:** Software can streamline new standards for PPDS, FSA rules for non-prepacked foods, the Procurement Act, and the Digital Markets Act (DMCCA).
- **Clear Labelling:** Separating marketing terms from actual safety data to protect customers who mistakenly rely on plant-based labels to avoid allergens.
- **Automated claims:** We automate claims based on the EU register and HFSS rating of the food.

54% of individuals who react to animal products use **vegan labelling** to assess food safety, highlighting the risk of relying on potentially misleading labels.

4

Business Continuity & Staff Training

The Compliance Challenge:

High staff turnover and labor shortages mean allergen knowledge leaves when staff do, breaking the consistency of a business's food safety management system.

- **Centralised Knowledge:** Moving data out of paper logs and into one digital system supports accurate and accessible food information, regardless of staffing issues.
- **On-the-Floor Access:** Hospitality teams should have immediate access to real-time allergen facts alongside structured training modules to upskill new staff quickly.
- **Audits:** During inspections, if any food business uses Nutritics ask them to show you the data process in app or they can export data for you to review.

All food data in one place, one process, one system.





WHAT'S ON THE HORIZON FOR FOOD SAFETY INFORMATION

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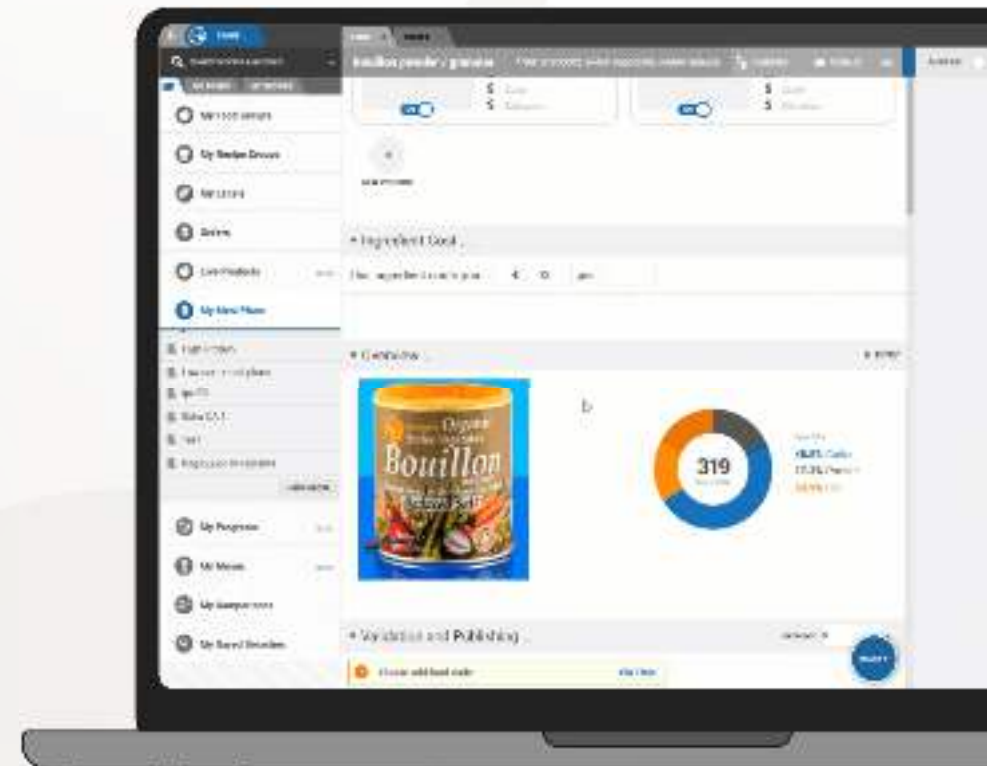
THE WAY FORWARD

A stronger mandate to underpin precautionary allergen labelling (PAL) - Current PAL use is highly inconsistent, leaving business and consumers confused about risk. Work at CODEX is significantly progressed – update expected Sept/Nov 2026

Paper-based allergen logs and manual tracking are no longer enough to guarantee safety in a modern food business.

Moving to a digital system removes human error, ensures ironclad due diligence, and keeps pace with evolving UK regulations.

Ultimately, digital transformation doesn't just protect the business - it protects the consumer.





PIONEERING FOOD BUSINESSES THAT USE NUTRITICS

aramark



wsh

The
Restaurant
Group



COMPASS
GROUP



brakes



NHS

HONEST
BURGERS

THE FRIDAYS



THANKS FOR LISTENING



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QUESTIONS?

Embrace innovation and invest in team development to streamline operations, boost efficiency, and build lasting trust.



+44 20 3769 5265 info@nutritics.com

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