



UKHospitality Allergen Q and A

Why do we need to get focused on allergens?

Some people are allergic to certain foods, and the consequences of eating these foods can be severe and even cause death. Business must by law serve safe food, and so we need to make sure that there are safe systems in place to deal with allergens and guests who have a food allergy or intolerance.

There are a number of different food laws that are appropriate for allergen control.

The Food Information to Consumers Regulations make it a requirement for food businesses to have information on whether 14 listed allergens (see below) are present as ingredients in foods. These must either be labelled on the menu or chalkboard, or if not, there must be a clear signpost to direct the allergic guest to a member of staff to find out information which must be available.

In addition, if someone tells you they do not want any ingredient in their food by law they must not be sold food with that ingredient in the food. This is important as it embraces the need to consider all the people who are allergic to foods other than those in the list of 14.

It is important that everyone from the suppliers to the chefs to the waiting staff will need to understand what food ingredients could cause allergies and how to inform their customers about them.

What should businesses do?

All food businesses must ensure they have the allergen information available for their customers. Where foods are not pre-packed by the manufacturer, this means that the information needs to be collated on-site and available to discuss with customers should they need to know about allergens. This includes businesses such as hotels serving food, restaurants, caterers, sandwich shops and bakers.

What are the allergenic ingredients listed in the law?

There are 14 allergens that must be labelled or indicated as being present in foods and these are:

- Cereals containing gluten such as wheat, rye, barley, oats, spelt or khorasan
- Crustaceans for example prawns, crabs, lobster, crayfish
- Eggs
- Fish
- Peanuts
- Soybeans
- Milk (including lactose)
- Nuts such as almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia (or Queensland) nuts
- Celery (including celeriac)
- Mustard
- Sesame seeds
- Sulphur dioxide (>10mg/kg or 10mg/L)
- Lupin
- Molluscs for example clams, mussels, whelks, oysters, snails and squid

Food includes drink, so information on allergenic ingredients in alcoholic and non-alcoholic drinks must also be given to customers on request.

Communicating allergen information to customers

Allergen information must be provided in hospitality settings in written or oral formats with clear signposting to where consumers can obtain this information, when it is not provided up front in a written format. Waiting staff will need to explain which ingredients in which dishes may be allergenic, or if they do not know, they will need to get a more senior member of staff or, in some businesses they have “allergy champions” to help.

Information on specific allergenic ingredients must be either written up front (for example on a menu or menu board) without the customer having to ask for information OR, if written information is not provided, there must be a statement in a prominent place in the establishment along the lines:

“Before Ordering, Speak to Our Staff if you have a Food Allergy or Intolerance.”

Information on which, if any, allergens are in a menu dish can be provided orally, but this must be consistent and verifiable (i.e. a business must have processes in place to capture information from recipes or ingredients lists from products bought-in and make this available to staff).

It is important that customers with food allergies or intolerances are able to make informed choices when choosing products.

All staff serving customers should be made aware of the potential risks to customers' health if they advise them incorrectly. A process must be in place to ensure that allergen information can be easily obtained and is accurate and consistent.

Customers are strongly advised to speak to staff regarding their allergy requirements. It may be a good idea to have a single point of contact for questions, rather than all waiting staff.

Questions & Answers

To support members, UKH has compiled a range of customer service and team-focused Q&As to help customer facing staff to understand the legislation.

Q: Should I offer advice to customers on allergens and what to eat?

A: It is the customer's responsibility to tell you which ingredients they are allergic to. But it is your responsibility to provide information on which foods being served contain that allergenic ingredient. Many businesses are now asking customers as they take the order if they have any food allergies, intolerances or requirements that they need you to be aware of, and this is good practice, and helps remind, particularly the younger guests, to speak up.

Q: What advice should I give to my team if they are asked for advice on what foods do and do not contain allergens?

A: Your team must be able to provide information on which foods contain the allergenic ingredient. This information must be accurate, and verifiable. They must check with those cooking the food, or consult any allergen recording system you have. If in doubt, always ask someone senior and double check. Do not guess.

Q: What action should I take if I sell take-away food?

A: You must ensure that allergen information is available for each of the dishes. You should provide a booklet, website information and / or information to the person taking take-away orders. It would be good practice for the person taking the order to ask if the guest has any allergy the kitchen needs to be aware of. The server should always check with the kitchen staff as well. It is good practice to mark the take-away container with any information about allergens, even if it is just to make the customer aware that they should ask for more information if they have any food allergies. Any item made specially for an allergic customer should be clearly marked. This includes drinks such as take-away coffee.

Q: If I am serving a buffet, what do I need to do?

A: If the buffet has been ordered in advance it is a good idea to ask the organiser for any details of anyone attending the buffet who suffers from a food allergy so that appropriate food

can be prepared and kept separate for that person. Even where this is done, there must EITHER be information on allergens clearly placed on/by each item with any of the 14 allergenic ingredients OR there must be a member of the catering staff on site who can provide allergen information if requested. As guests may be allergic to foods other than the 14 listed in the law, it is good practice to have a notice that says: "Foods may contain allergens, please ask for more information if you have any allergies or intolerances."

Q: Are there any 'hidden extras' I need to be aware of, for example where it's not obvious that an allergen exists e.g. dairy in seasoning?

A: A list of foods with allergens could be exhaustive and still not be enough. You have to make sure that you communicate with your suppliers and that you are notified if there are ingredient substitutions. You need to keep a record of food being delivered with the allergenic ingredients and ensure that the chef keeps a record of what allergenic ingredients he has used in dishes. A labelling system for dishes in the refrigerator as well as the use by date is a good idea.

Q: With regards to contamination issues in the kitchen, how do I best refer to this in my customer information? Can I give a general disclaimer when giving specifics e.g. "there are no peanuts in that item; however, we do use peanuts in our kitchen"?

A: You must provide accurate allergen information, but you cannot and should not give a guarantee that your dishes are allergen free if you are not able to guarantee this. If you find that you are not able to deliver safe food to the customer, then you should say so. It is not against the law to tell them that at the moment you cannot guarantee the food will be free of the allergen they are allergic to.

Q: Do I need to get expert advice & new systems, or can I manage this myself?

A: You can do it yourself, of course. Keep an eye on the UKH website and also the Food Standard Agency website.

Q: What if I received a pre-packed item with no allergen information?

A: It is a legal requirement that suppliers must provide information on allergenic ingredients on labels of pre-packed food. If this happens, then don't use it and send it back.

Q: What if I have old stock that doesn't have allergen details and I can't find it?

A: Contact your supplier. With the batch code, they should be able to help. When you get the information, you can add it to your allergen system or matrix. Do not use it if you are unsure.

Q: Does the new regulation cover beverages too?

A: Yes, it covers both soft and alcoholic drinks and hot drinks too.

Some legal definitions

Mass caterer / Catering establishment

A restaurant, canteen, club, public house, school, hospital or similar establishment (including a vehicle or a fixed or mobile stall) where, in the course of a business, food is prepared for delivery to the ultimate consumer and is ready for consumption without further preparation.

'Pre-packed food'

'Pre-packed' foods are foods, which have been put into packaging before sale (to the final consumer or to mass caterers), where there is no opportunity for direct communication between producer and customer, and the contents cannot be altered without opening or changing the packaging. For example, most pre-packed foods sold in supermarkets will fall under this definition, such as tinned food, ready-made meals or frozen food products.

'Pre-packed for direct sale'

Generally, means those foods that have been packed on the same premises as they are being sold. In these situations, it is thought that the customer would be able to speak to the person who made/packed the foods to ask about ingredients and so these foods do not have to be labelled with ingredients by law. Foods which could fall under this category are meat pies made on site, and sandwiches made and sold from the premises in which they were made. Whilst these foods may not need to be labelled, recent events have shown that customers can be confused and may think that absence of a list of ingredients could mean absence of allergen. Therefore, our advice is to place an allergen awareness sticker on the food inviting guests to ask for information if they have allergies.

Q. What if I put details of allergens in a food on a shelf label near the food?

A. The problem with this is that your customers may move foods around, and so someone may pick up and eat a food that is not displayed in the right place. It is better to raise awareness on each pack and talk to customers if they need allergen information.

'Non-pre-packed' (Loose foods)

Foods which are non-pre-packed can be often described as foods sold loose. In a retail environment this would apply to any foods which are sold loose from a delicatessen counter (for example, cold meats, cheeses, quiches, pies and dips), fresh pizza, fish, salad bars, and bread sold in bakery shops etc. In a catering environment this would apply to most foods sold,

so foods ready for consumption such as meals served in a restaurant, café or purchased from a takeaway.

UKHospitality perspective

“UKHospitality is a consistent advocate of local supply chains across the hospitality and tourism industry. These allergen regulations mean that knowing your suppliers and the ingredients used is vital.

“Our view and approach has always been to encourage food service businesses to purchase food from smaller local businesses. This is demonstrated by our involvement with SALSA (Safe and Local Supplier Approval Scheme) which provides assurance of food safety in small businesses and is supported by UKH members.”

Facts & Stats

- According to the NHS 1-2% of adults have a food allergy
- According to the NHS 5-8% of children have a food allergy
- However, when questioned, 20% of people think they have an allergy (source: NHS)
- There are 14 allergenic foods as part of the regulations
- There are c. 8 billion meals served each year in the UK
- In the UK the focus is on providing information to the consumer orally rather than having large amounts of information on the menu. Our focus is on training and awareness. We believe that this is important as it captures the need to discuss allergens that are not on the list of 14.
- The requirements cover hotels, restaurants, caterers, pubs, festival caterers, burger vans, street food sellers, bakers, sandwich makers etc.

UKH Allergen Toolkit content

UKH is updating its Allergen Toolkit which will be available to members shortly. The toolkit will include:

- UKH Food Allergen Checklist
- Template letter to food suppliers
- Template letter to drink suppliers
- Allergen Questions & Answers

FIND OUT MORE:

- <https://www.ukhospitality.org.uk> for an allergen toolkit for hospitality providers
- For information about food allergy and intolerance go to: <http://www.food.gov.uk/sites/default/files/multimedia/pdfs/publication/allergy-leaflet.pdf> and <http://www.nhs.uk/conditions/food-allergy/Pages/Intro1.aspx> and <http://www.food.gov.uk/sites/default/files/multimedia/pdfs/publication/loosefoodsleaflet.pdf>
- For more on food intolerance and coeliac disease go to: <http://www.food.gov.uk/news-updates/news/2012/4972/glutenfactsheet>
- Visit the allergy and intolerance section of the Food Standards Agency's industry and enforcement site: <http://www.food.gov.uk/business-industry/allergy-guide>
- [Detailed list of 14 Allergens](#) from Food Standards Agency

*This information toolkit is provided by the UK Hospitality Industries. It is intended to assist in interpreting the Food Information Regulations 2014 and European Directives 2003/89/EC and 2006/142/EC. The content is provided for general information only and must not be used for giving legal or other professional advice. Whilst every care has been taken to ensure the accuracy of content, the authors accept no responsibility for loss or consequential loss occasioned to any person acting or refraining from action as a result of any statement in it.