NCASS
Allergen Toolkit

To help you prepare for changes coming into force on 13 December 2014
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Introduction

NCASS has compiled the following information on the steps that must be taken in order to comply with new allergy legislation due to come into force in December 2014.

This document explains concepts of how to implement an effective allergen management program, train staff in food allergen risks, and how to communicate accurate and consistent information on the allergens in your food.

This information is for anyone who:

- Provides meals in a café or restaurant
- Sell foods that you wrap yourself, such as loose bread rolls, sandwiches, cakes, deli products or other unpackaged foods

Environmental Health Officers and Trading Standards Officers

EHOs and TSOs are the enforcement officers for this legislation. You will be asked how you are complying with this new legislation during inspections.

Why food allergies matter

Some people experience an adverse reaction when exposed to certain foods. There are generally two types of reaction to food:

- A **food allergy** can result in a serious reaction called anaphylactic shock which can result in death. It can also trigger symptoms such as a rash, wheezing and itching. Food allergies are known to result in rapid and potentially serious responses to a food or food ingredient by the immune system.

- A **food intolerance** can result in an adverse reaction that is reproducible and takes place every time contact is made with a particular food or food ingredient. Food intolerance does not usually involve the immune system (the exception to this is coeliac disease).

What are the new rules?

New allergen rules come into effect on 13th December 2014. This will affect how allergen information is provided on prepacked food labels. It will also introduce a new requirement to provide allergen information for foods sold or provided loose, such as most caterers would provide, in the form of sandwiches, plated meals, snacks etc.

It means that caterers must be able to provide information to their customers regarding the presence of any of the 14 specified allergens as ingredients in any of the food that they serve.

Therefore caterers must know exactly what is in their food, and they must understand the requirements to meet the legal obligations. To do that caterers must be able to provide evidence of the exact ingredients used, in their food or menu.

The new rules state that allergenic ingredients in prepacked food must be emphasised in the ingredients list, e.g. by **highlighting**, **emboldening**, **CAPITALISING**, **underlining**, **italicizing** or putting them in **another font**.

Under the new rules, allergenic ingredients information must be available for food sold loose too, including foods packed on the same catering premises from which they are being sold (known as prepacked for direct sale).
The 14 allergens that must be declared for customers:
Information on prepackaged food

When using prepacked foods in your menu, any ingredient containing one of these allergens will be included in the ingredient list. The name of the allergen will be emphasised in bold, underlined or in some other way identified.

Example
- skimmed milk
- goats cheese (milk)
- wheat flour
- prawns (crustacean)
- lactose (MILK)
- wheat gluten
- Nut (Almond)

You don’t have to produce a full list of ingredients in your menu, you just need to show any of the 14 allergens that are used.

*Note: the cereal containing gluten (wheat (such as spelt and Khorasan), rye, barley, oats and their hybridised strains) and the specific nut (almond, hazelnut, walnut, cashew, pecan nut, Brazil nut, pistachio nut and macadamia nut (also known as Queensland nut)) should be mentioned and emphasised.

Procurement and purchasing of food

Ideally you should purchase from suppliers who include the allergens on their packaging or in a product specification sheet, or who keep a book that you can access, listing ingredients for any product that you use.

Safe storage and preventing cross contamination

Under the new allergen rules you are required to declare the 14 allergens when present as ingredients in food. However, under general food safety principles, we advise you also consider other allergen risks as part of your allergen management.

Allergenic cross contamination risks must be considered when storing food. Wherever possible, store allergenic ingredients in sealed containers that are clearly marked and separate from non-allergenic foodstuffs. Make sure food-handling staff are aware of the dangers of cross-contamination.

The safe storage of ingredients should be included as part of the food safety management system and food safety risk assessment.

Keeping customers informed

Allergen information should be made available or offered to all customers. You can do this in the form of a notice or sticker that encourages customers to ask about allergens, or signpost allergens on your menu or chalkboard:
Recording information about ingredients

When you’re preparing a dish, think through all the ingredients that you use in your recipe, and then carefully record them all.

To help to identify which dishes contain allergens:

- Make sure that your kitchen staff use the same recipes every time, or make a record if a recipe changes or an ingredients is substituted
- Keep a copy of the ingredient information on labels of prepacked foods like sauces, desserts etc.
- Keep ingredients in the original containers where possible, or keep a copy of the labelling information in a central place (either on paper or stored electronically)
- Ensure that containers are clearly labelled, for ingredients which are delivered in bulk, and then transferred or stored in smaller containers
- Make sure that staff are aware of where this allergen information is stored and how it is kept
- Ensure that the allergen information is kept up to date (for example, if recipes are changed or products substituted)
- Always check deliveries to make sure that you’ve got what you ordered. Ensure that the relevant labelling information is provided with the order
- Make sure that any records are updated, to help trace back to the source of your information
- Check that the food delivered is the same brand that is normally used, as different brands might have different ingredients

If you are using a prepacked food as an ingredient in your recipe, remember that some products have a long shelf life, like tinned or dried food. This means that you may see both types of labelling (old and new) being used on these products before December 2014 and after (for a limited period). Always remember to read the label!

Product substitution

Caterers should be aware of the products that they normally use. If, for any reason, another product is used as a substitute, it must be recorded. You should never assume that any one product has the same allergen content when provided in different quantities or packs; for example a 1kg single pack could be very different to a 10 kg bulk pack.

Other ways of selling

If you sell food at a distance, like through telephone orders for a takeaway, allergen information must be provided:

- Before the purchase of the food is complete (this could be in writing or orally)
- When the food is delivered (we suggest in written format)

Ignorance is no excuse

You and your staff can no longer state that you do not know whether a dish contains any of the 14 major allergens, or that it may contain allergens. If you do this after 13 December 2014 you will be breaking the law and could be liable to prosecution.
Keeping the staff informed

Allergen information must be clear, legible and accessible to staff, so that they can answer any questions posed by a customer. In practice this can be achieved in many ways:

- By verbal communication from an appropriate member of staff
- A book kept in the food safety management system for the purpose
- On the menu or menu board
- On labels

You might find it useful to make a chart that highlights allergenic ingredients in each of your dishes. You could keep the information in a book as a quick reference guide for your staff.

Here is a sample allergens information sheet (there is a working copy at the back of this pack):

![Dishes Table]

Note: If the allergen information is provided verbally there must be a way for it to be:

- Checked by others (it must be verifiable)
- Confirmed as accurate
- Consistent

Identifying training needs and delivering training

Food businesses should ensure they have the correct training in place to enable staff to handle customer requests on food allergies and intolerances. Staff must know how to deal with any questions they may be asked.

All training must be appropriate to the role of the person undertaking the task and providing the service, especially chefs and any staff responsible for producing and providing information to consumers. That means it is important that staff understand their role and responsibilities concerning allergens and know where and how to obtain and maintain the information on ingredients.

Roles and Responsibilities

Whenever food is being served, there must be someone on site who can deal with all questions relating to allergenic ingredients, or who knows where to get information.

The poster on the following page sets out the type of process that staff should undertake when a customer asks about allergens.
1. ‘Is there any egg in this?’

2. ‘I don’t know. I’ll check.’

3. ‘Do you know if this has any egg in it?’

4. ‘I’ll check.’

5. ‘Yes, there is egg in it.’

6. ‘Let me help you choose something else.’
Dealing with a severe allergic reaction

All staff should know how to proceed if a customer undergoes an allergic reaction. Here are the basic steps:

- **Do not** move the customer; doing so could make them worse.

- **Call 999** immediately and describe the situation. Explain that you think the customer may be having a serious allergic reaction or anaphylaxis. Mentioning the word anaphylaxis will communicate the urgency of the situation to the emergency services and will ensure that appropriate medication will be available.

- Ask the customer if they carry an **adrenaline pen** and help them retrieve it. If the customer is struggling to self-administer and a staff member or first aider is trained in administrating adrenaline, then offer to assist them.

- Send someone outside to **wait for the ambulance** while you stay with your customer until help arrives.

**Warning Signs**

Typical warning signs include:

- Difficulty in breathing
- Swollen lips or mouth
- Someone collapsing

You should be aware that it is not always clear if someone is having an allergic reaction because other serious conditions can have similar symptoms.

**Further Information**

The Food Standards Agency offers an excellent online training package to help caterers understand what good practice is. The training can be accessed here: [http://allergytraining.food.gov.uk](http://allergytraining.food.gov.uk)

**The Nationwide Caterers Association**

We are a trade association that is wholly dedicated to providing caterers with information, systems and support to trade profitably, safely and legally. You can learn more about us at:

www.ncass.org.uk

www.facebook.com/nationwidecaterersassociation

@NCASS_UK

0121 603 2524
Menu Information sheet

<table>
<thead>
<tr>
<th>DISHES</th>
<th>Celery</th>
<th>Cereals containing gluten</th>
<th>Crustaceans</th>
<th>Eggs</th>
<th>Fish</th>
<th>Lupin</th>
<th>Milk</th>
<th>Molluscs</th>
<th>Mustard</th>
<th>Nuts</th>
<th>Peanuts</th>
<th>Sesame seeds</th>
<th>Soya</th>
<th>Sulphur dioxide</th>
</tr>
</thead>
<tbody>
<tr>
<td>Tuna Salad [example]</td>
<td>✓</td>
<td></td>
<td></td>
<td>✓</td>
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<td>✓</td>
<td>✓</td>
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</tr>
</tbody>
</table>
