

ALLERGEN MANAGEMENT HOUSE RULES

What is an Allergen?

A food allergy is when the body's immune system reacts unusually to specific foods. The food that the body reacts to is known as the allergen. Most allergic reactions to food are mild, but some can be very serious and in some cases **fatal**. The only way people can deal with a food allergy is to avoid the foods that make them ill.

Customers may have an allergy to <u>any</u> type of food. To ensure you can provide safe food and drinks you must have the correct controls in place to identify ingredients, produce safe food and communicate this information to your customers.

There are 14 major allergens which need to be mentioned (either on a label or through provided information such as menus) when they are used as ingredients in food. Under current legislation on the provision of food information to consumers (Retained Regulation (EU) No. 1169/2011) and Food Information (Scotland) regulations 2014, the **duty is on food business owners** to ensure that all mandatory allergen information (relating to the 14 allergens) is accurate, available and easily accessible to the consumer.





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14 INGREDIENTS LINKED TO ALLERGIES AND INTOLERANCES

There are 14 major allergens which need to be mentioned (either on a label or through provided information such as menus) when they are used as ingredients in food. Here are the allergens, and some examples of foods they may be found in



CEREALS CONTAINING GLUTEN

Wheat (all varieties including spelt, Khorasan etc.), rye, barley and oats are cereals that contain gluten. These cereals can also be found in foods containing flour, such as batter, breadcrumbs, bread, cakes, couscous, processed meat products, pasta, pastry, sauces, soups, fried foods which are dusted with flour, some brands of baking powder etc.



EGGS

Egg includes eggs from all birds including hen, duck, quail etc. Eggs can also be found in foods such as cakes, some meat products, mayonnaise, mousses, pasta, quiche, sauces, pastries or foods brushed or glazed with egg etc.



MUSTARD

Mustard, mustard powder and mustard seeds are included in this category. Mustard can also be found in breads, curries, marinades, meat products, salad dressings, sauces and soups etc.



SESAME SEEDS

Sesame seeds are often found on hamburger buns and in salads. They are also found in breads and breadsticks, hummus, sesame oil, tahini etc.



TREE NUTS

Tree nuts refer to nuts which grow on trees, namely - almonds, hazelnuts, walnuts, cashews, pecan nuts, brazil nuts, pistachio nuts, macadamia (or Queensland) nuts. Tree nuts are also found in many foods including breads, biscuits, crackers, desserts, nut butters, nut powders (often used in Asian curries), stir-fried dishes, ice cream, marzipan (almond paste), nut oils, sauces etc.



CRUSTACEANS

Crustaceans include crabs, lobster, prawns and scampi. They may also be found in shrimp sauce, shrimp paste (commonly used in Thai and south-east Asian food), shellfish stock, paella, fish soups such as bisques and bouillabaisse etc.



SULPHUR DIOXIDE AND SULPHITES

Sulphur dioxide and sulphites are often used as a preservative in dried fruits such as raisins, dried apricots, prunes etc. They can also be found in meat products, prawns, vegetables, soft drinks, wine and beer, etc.



CELERY

Celery includes celery stalks, leaves, seeds and the root called celeriac. Celery is also found in celery salt, salads, some meat products, soups, stock cubes etc.



MILK

Milk includes milk from all animals including cows, sheep, goats etc. Butter, cheese, cream, milk powders and yoghurt are derived from milk. Milk can also be found used in a variety of foods including foods brushed or glazed with milk, and in powdered soups and sauces etc.



SOYBEANS

Soybeans also called soya, is found in tofu/bean curd, edamame beans, miso paste, textured soya protein, soya flour or lecithin E322 (if made from soya). Soya is a staple ingredient in oriental food. It can also be found

in desserts, ice cream, meat products, sauces, vegetarian products etc.



PEANUTS

Peanuts are legumes and grow underground, which is why they are sometimes called groundnuts. Peanuts are often used as an ingredient in biscuits, cakes, curries, desserts, and sauces (such as satay sauce). They are also found

in groundnut oil, peanut flour and peanut butter etc.



FISH

Fish includes all species of finned fish, fish oils and caviar. Fish is also found in condiments such as fish sauce, Worcestershire sauce, salad dressings (e.g. Caesar salad), stock cubes etc.



MOLLUSCS

Molluscs include mussels, oysters, scallops, escargot (snails), octopus and squid including its ink. They may also be found in oyster sauce, paella, fish soups etc.



LUPIN

Lupin flour and seeds can be used in some types of bread, pastries, pasta etc.

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What is a Food Intolerance?

Food intolerances are more common and are caused by the body being unable to digest certain substances e.g. lactose. They are not the same as food allergies, as most do not involve the immune system.

Food intolerances can make someone feel very ill and affect their long-term health. You will usually feel the symptoms of a food intolerance slower than a food allergy, and sometimes it may not be felt until a few hours after you have eaten the food. Symptoms can last for hours, even into the next day.

Why is it important to manage allergens?

You as a food business operator have a legal responsibility to produce safe food, provide allergen information and follow labelling rules to ensure the food and drinks you produce do not cause harm to the consumer.

This means that food business operators must:

- provide allergen information to the consumer for both prepacked and non-prepacked food and drink
 - Note:- drink includes all drinks that are sold from the premises e.g. teas, coffees
- handle and manage food and drink allergens effectively during preparation.

Food businesses must make sure that their staff are trained in allergens and are familiar and competent in the businesses procedures and practices to ensure the safe management of allergens in all areas of the business.

Low Gluten & Gluten Free

If you intend to produce any gluten free products you must consider the following:-

Current legislation has set levels of gluten for foods that claim to be either 'gluten-free' or 'very low gluten'. These levels are:

- 'gluten-free' 20 mg/kg of gluten.
- 'very low gluten' 100 mg/kg of gluten. However, only foods with cereal ingredients that have been specially processed to remove the gluten may make a 'very low gluten' claim.

These regulations apply to all foods – pre-packed or sold loose.

Food Businesses can only use the phrase 'gluten-free' if they can demonstrate that, when tested, their product is 20 parts or less of gluten per million. They will also be required to demonstrate that any products claiming to be 'very low gluten' comply to the legislation.

Producing foods with no deliberate gluten-containing ingredients which are produced in areas where there is a high risk of gluten cross-contamination, cannot be labelled as 'gluten-free' or 'very low gluten'.

How can I comply with allergen requirements?

To comply with allergen food law, food businesses must have a good understanding of their ingredients, processes and products in order to correctly identify and manage allergens. This will help food businesses train staff and communicate with their customers.

Allergen management can easily be done in four steps:

- 1. Identify allergens in your business
- 2. Manage allergen risk
- 3. Train your staff
- 4. Communicate with customers

Below are <u>free</u> tools available to support food businesses with allergen management;

Online Allergen Training

To help you and your staff with allergen awareness consider incorporating this training into your staff training programme. It has been developed by Food Standards Scotland to help bring greater awareness about allergens in manufacturing and catering settings.

MenuCal

MenuCal is a free to use online tool that is designed to help food businesses comply with legal requirements to manage and record allergen information. The free tool can also be used to calculate the amount of energy found within the foods you are producing. MenuCal helps you comply with the law by helping you to identify, manage and communicate allergen information for food and drink on your menu.

STEP 1: IDENTIFY ALLERGENS IN YOUR BUSINESS

As a food business you have a basic legal responsibility to have a food safety management system based upon the HACCP (hazard analysis and critical control points) Principles. This ButcherSafe document forms part of your Food Safety Management System. Food allergens must be considered as a hazard in the food and drinks that you produce, therefore they should be a key consideration in your Food Safety Management System.

Identifying Allergens in your Food and Drinks

Buying and Receiving Foods & Drinks

- When buying ingredients, foods and drinks, the supplier must provide you with all necessary
 ingredient and allergen information. Where foods are not labelled it should be provided in the
 accompanying paperwork ensure it matches information already held onsite
- When you receive deliveries, the foods you have received should match what you ordered.
 Check if there have been any substitutions or any different brands included. Different brands of products may have different ingredients and therefore different allergens. This is also true for other suppliers, as their products may contain different ingredients and allergens.
- Any substitution or change in ingredients must be recorded with ingredient and allergen information reviewed and updated accordingly.
- It is good practice to check the condition of the packaging of any goods you receive. This way you can ensure that none of the packaging is damaged which could potentially contaminate foods with other allergens.

Standard Recipes

- The easiest way for you to identify allergens within your business is to create and follow standard recipes. If you use a standard recipe the food will be made with the same brand and/or allergens every time you or your staff make it. E.g. use of marinades, gravy mixes or seasonings
- By following standard recipes you can easily identify the allergens used within a product and provide correct and consistent information including any 'may contain' information that is included on the labels of the foods you use
- If you use non standard recipes (daily/weekly/seasonal specials) you should have a system in place to ensure that you can identify all ingredients and any allergens within the product and communicate this to your staff and customers
- There is a standard recipe template within <u>the Menucal tool</u> that might help you record your recipes which can be found at https://MenuCal.fss.scot.

STEP 2: MANAGE ALLERGEN RISKS

How do I manage the allergen risk?

This can be done by adapting the following guidance for your business.

Deliveries and Labels

- When receiving ingredients, foods and drinks the supplier must provide you with all necessary
 ingredient and allergen information. Where foods are not labelled it should be provided in the
 accompanying paperwork.
- Check that the food delivered matches your order if it does not match, check the ingredient list and allergen information of the replacement product then update your records when you start using the new ingredient.
- You should not accept a delivery unless you are fully confident you have all the required correct information.
- Make sure that you keep all receipts and invoices for a reasonable period of time to ensure traceability. By having this system in place if there is an issue with a product it should be easily identified and traced.
- Ensure that packaging is not damaged to ensure there has been no cross contamination.
- It is good practice to have a frequent review of regularly used ingredients, foods and drinks for ingredient and recipe changes.

Standard Recipes

- Following standardised recipes for foods and drinks ensures that all products produced are essentially the same every time.
- When a non-standard recipes (e.g. daily/weekly specials) is used there should be a system in place to ensure that all ingredients and any allergens are identified and recorded.
- if you choose a new brand or a new supplier, you must check to see if these changes contain additional or different allergens than previous brands or suppliers you used ensure you have a method for logging the end of one batch and the start of a new batch with the new ingredient
- Where there are substitutions made as a result of low stock or special requests, food businesses should have a system in place to record and communicate changes to all staff and relevant customers.
- It is good practice to have a frequent reviews of your recipes.

Storage

- Food businesses must have procedures in place for safely storing food, particularly allergen containing foods and drinks to minimise cross contamination.
- Foods that contain allergens in powdered form such as milk powder or flour should be stored in air-tight containers.
- Where foods are decanted into containers, ensure the containers are clearly labelled with exactly what food they contain as well as any ingredients and any allergens.
- Do not 'top up' ingredients held in containers. Finish the product, clean the container, then reuse container.
- Where allergen free foods are prepared e.g. gluten free sausages, these should be stored separately from other foods that contain gluten

Cross-Contamination

- Allergens can easily pass from one food to another or from surfaces/equipment to food. This can
 occur when foods are prepared on the same surfaces, using the same equipment e.g. mincer or
 when allergen free foods are prepared close to allergen containing dishes (e.g. flour dust,
 splashing).
- Thoroughly clean all equipment, utensils and worktops before preparing allergen-free food, or use separate equipment. This is especially important with complex equipment such as mincers and slicers
- Handling foods Always wash your hands thoroughly before preparing allergen-free food ensure you follow your <u>Personal Hygiene House Rule</u>
- After preparing an allergen-free food, its good practice to keep it covered, keep it labelled and deliver it separately to the customer.
- Put in place steps to prevent cross contamination between foods that contain allergens and those foods that do not. Remember! Minute traces of foods which contain allergens can get into other foods and cause a reaction.

Cleaning and Disinfection

- Be aware that allergen residues are enough to cause an allergic reaction. Allergen residues can be found anywhere that has had contact with allergens as well as anywhere dust, crumbs and food may accumulate.
- You must ensure that you carry out effective cleaning and disinfection practices on equipment and surfaces.
- Surfaces can be cleaned using the 2 stage clean and disinfection (<u>See Cleaning House Rule</u>)
 method.

- Utensils can be cleaned in the same way or with a dishwasher capable of providing adequate disinfection (See Cleaning House Rule).
- Larger complex pieces of equipment may have to be broken down to be cleaned and disinfected.
 Whereas some other equipment may not be able to be cleaned to the same extent e.g. vacuum packer, deep fat fryer, slicers etc. there must be procedures in place for managing allergens e.g. separate allergen-designated equipment.
- Before preparation of any allergen free foods and drinks, the surface, any utensils and equipment must be cleaned and disinfected.

Specific Rules for the Preparation of Food & Drinks for an allergy sufferer

Whenever preparing or serving food for an allergy sufferer:

- Where possible use a separate work surface/ area to prepare allergen free food or drink. Where
 this is not possible ensure thorough cleaning and disinfection of preparation area and equipment
 is practical.
- Clean and disinfect the work surfaces before and after preparing foods.
- Clean and disinfect equipment and utensils before preparing any allergen free dishes.
- Not all equipment can be properly cleaned, e.g. vacuum packers etc. These types of equipment cannot be used for both allergen free foods and allergen containing foods.
- Wash your hands thoroughly. Where gloves are used, ensure that these are changed regularly and before preparing an allergen free order.
- Do not cook food intended to be allergen free in oil in which you have cooked other foods.
- Do not remove allergenic ingredients, such as nuts, from a prepared dish and call it allergy-free because residues of the allergenic ingredient may remain in the dish and may still cause a reaction.
- When displaying food and drinks in display cabinets, always lay them out in a way that will minimise the risk of allergen-free food being contaminated with ingredients from allergen containing foods.

Take Away and Delivery

- When receiving any orders via the phone, it is good practice to ensure that the member of staff asks if the customer has any allergies
- If you use online menus/ordering you should signpost that customers should make you aware of any allergies.
- You must ensure that your online information is frequently reviewed and kept up to date.

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- It is good practice that food being delivered that is allergen free should be labelled as such and should be packaged separately and away from any foods that contain the allergen, ideally in its own bag to avoid cross contamination.
- Food Business Operators selling non-prepacked food (this includes prepacked for direct sale food)
 through distance selling (e.g. such as food businesses which offer purchase through telephone/
 internet) must ensure that mandatory allergen information is available to the consumer (for free):
 - before the purchase is concluded; and
 - at the moment of delivery.

STEP 3: Training your Staff

All staff should get basic training in food allergen management before they first start work and receive regular refresher training. All training carried out should be accurately documented and recorded. All staff should be trained to handle any customer allergen queries and understand the potential severity of not handling allergens and allergen information correctly.

Make sure that all staff understand that they should never guess whether or not an allergen is present in a food. They should ask someone who knows. **Always be honest with the customer. If you do not know, admit it!**

In order to help you with training your members of staff and understanding allergens, you can visit the following Allergen Training Tool.

Below are some points to consider when developing training for staff members:-

<u>Management</u>	<u>Preparation Area</u>	Counter Staff	Takeaway/ Delivery
Check all allergen paperwork and	Ensure there is knowledge	Have knowledge and awareness of	When receiving any orders via the
documents for accuracy	and awareness on allergen	allergen risks and control	phone, you should ensure that the
	risks and controls		member of staff asks if the customer has
			any allergies
Manage knowledge and awareness	Create standard recipes to	Trained to respond to allergen queries	Never guess as to the ingredients in a
of allergen risks and controls	ensure all preparation area	from customers	food
	staff are aware of what		
	allergens are contained in		
	what products		
Make sure that all staff members are	Responsible for cleaning and	Know that they must inform other	If you use online menus etc, you should
trained on allergen risks and controls	disinfection within the	relevant staff members of any	signpost that customers should make
	preparation area	customers who suffer from allergies	you aware of any allergies
Ensure that staff consider what	Create any allergen free	Where orders are made online, staff	Food being delivered that is allergen free
foods of personal use that they may	dishes requested	should additionally inform the	should be labelled as such and should be
bring onto the premises especially		preparation area staff about the	packaged separately and away from any
before handling allergen free foods		allergen free order	foods that contain the allergen, ideally in
e.g gluten containing bread, peanut			its own bag to avoid cross contamination
bars			
	Have procedures in place to	Never guess as to the ingredients in a	All foods produced must contain correct
	ensure all staff are informed of	food	labelling (where applicable).
	any last minute recipe		
	changes		

STEP 4 Communicating with your Customers

Let your customers know that you would be happy to discuss their requirements with them. For example, highlighting on the menu or chalkboard that customers should ask staff for further information if they have any concerns about allergens. You should also display a poster that explains to customers to raise it with staff if they have an allergy i.e. 'if you have a food allergy please inform a member of staff'

Where possible, design your menu and product labels to ensure names and descriptions of product labels or tags reflect potential allergenic ingredients, for example, "chicken stir fry in a satay sauce made with peanuts" or Marinades e.g chicken marinaded in buttermilk.

Communication with Customers

- Taking orders ask if the customer has any allergies. If you are asked any queries do not
 guess the answer, talk to someone who does know the answer such as a manager or
 butcher to find out allergenic ingredients.
- Staff communication tell all staff when a customer has an allergy, this includes any change of shift staff. If you are asked any queries do not guess the answer but talk to someone who does know the answer such as a manager to find out allergenic ingredients.
- If you provide food items to other businesses i.e. takeaways and mobile food units, you must ensure that you pass on relevant allergen information in a suitable format (see below) e.g. allergen sheets, specification documents, labels.

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Method of	Packaged Food and Drinks	Non – Prepacked food	Prepacked for Direct Sale	Distance Selling
food	- I delicaçõe i oba dila Dilinio	and Drinks	- 1 - C pushed for Direct suite	<u> </u>
		and Drinks		
provision				
Definition	Any product put into packaging before being placed on sale. Packaged before sale (to 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.	Non-prepacked food and drinks is unpackaged food. Often described as foods sold loose.	Foods prepared and packaged before sale to the final consumer by the same food business:- - on the same food premises - on the same site - on other premises owned by the same food business e.g. market stall, mobile vehicle.	Distance selling or food sold by means of distance communication. This is any means which, without the simultaneous physical presence of the supplier and the consumer, may be used for the conclusion of a contract between those parties.
Example	Most pre-packed foods sold in supermarkets will fall under this definition, such as tinned food, ready-made meals or frozen food products.	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, loose sausages, fish etc In a catering environment this would apply to foods ready for consumption such as meals served purchased from a takeaway.	Sandwiches prepared and then placed into packaging by the food business, before the consumer selects them, and sold from the same premises. Foods prepared and packaged by the same operator and then taken to their market stall to sell. Foods prepared and packed by an operator in a central premises and then sold to consumers from mobile shops or stalls operated by the same business.	Takeaway food, such as pies, ordered over the telephone. Food purchased online via a website or other online marketplace.
Labelling requirements	Allergens should be emphasised (highlighted, bold, underline etc) throughout the ingredient list These need to be in line with the legal requirements that apply to naming foods and listing ingredients. Link to full labelling Guide	Provide allergen information in a manner that suits the business format e.g. tags or tickets, chalk boards, menus, labels. These need to be in line with the legal requirements that apply to naming foods.	Allergens should be emphasised (highlighted, bold, underline etc) within the text of the ingredients list . These need to be in line with the legal requirements that apply to naming foods and listing ingredients. Link to PPDS Guidance	For prepacked foods sold via distance means, mandatory food information set out in Article 9(1) of FIC (apart from the durability date) must be available before the purchase is concluded and with no additional costs. All mandatory information must be provided at the moment of delivery to the consumer. For food sold non-prepacked, including prepacked for direct sale, allergen information should be made available by the FBO before the purchase is concluded, and be made available at point of delivery (e.g. via a menu, sticker).

How to provide allergen information;

There are a number of ways in which allergen information can be provided to your customers. How you provide allergen information will be determined by the way in which you provide your customers with food and drinks e.g. packages, non-prepacked or prepacked for direct sale.

Different allergen labelling rules apply depending on how the food is provided.

May Contain Statements

The use of precautionary allergen labelling to communicate the risk of the unintentional presence of an allergen (e.g. milk, egg, peanuts, almonds) in a food product due to the allergen entering the product accidentally, or through cross contamination, can be done on a voluntary basis. Such statements include 'produced in a premises which uses...' or 'may contain' or 'not suitable for...'. These statements should only be used after a meaningful risk assessment has been performed by your business and there is considered to be a significant and real risk to the food allergic or food intolerant consumer and cross contamination cannot be avoided or discounted. If you choose to use voluntary labelling it must not mislead the consumer, must not be ambiguous or confusing, and where appropriate be based upon scientific data.

These statements should not be used as a substitute for good hygiene and safety practices. The use of precautionary allergen labelling when there is not a real risk could be considered to be misleading food information. Undertaking a risk assessment should help you identify risks that you can remove, perhaps by identifying and preventing opportunities for cross contamination to occur.

Managing an allergic reaction emergency

It may never be something you encounter but you and all staff should be prepared in case there is a customer who has a severe allergic reaction or suffers from anaphylaxis. You do not need to be an expert if this situation happens but you can act and make a difference.

When an allergic reaction starts it can worsen very quickly therefore quick reactions are important. If possible staff should have first aid training that incorporates what to do in an allergic reaction situation.

Allergic Reaction - What to do?1

Anaphylaxis - Illnesses & conditions | NHS inform

Allergic Reaction: - Internal Process Review

If a member of the public takes an allergic reaction to your food you must carry out a review of your allergen procedures. This will include:

- Procedure for asking about customers dietary requirements
- Procedure for recording/communicating customer dietary requirements
- Communication methods between the front of house and kitchen staff
- Handover procedures between shifts (if necessary)

If the food is still available, it is good practice to seal, label and store it in case an external investigation is carried out e.g. Environmental Health

It is good practice to record any such incidents to allow you to identify issues in your procedures.

WHAT YOU NEED TO DO NOW

To effectively manage allergens in your food business, carefully read the information in part 1 and part 2 below, then go to the next two pages and Allergen Management House Rules and Menucal Template

PART 1: Recording and Presentation of Allergens

Refer to the allergen information on pages and then you can create standard recipes so that you can identify all allergens within the foods and drinks you both buy and sell.

PART 2: Allergen management house rules

Refer to the guidance provided in **Steps 2, 3 and 4 on the previous pages**, then go to the end of this section and write a list of House Rules covering allergen management for your business.

Here is an example of how you could write your house rules:

	Allergen Management House Rules Describe: • Control Measures and Critical Limits • Monitoring including frequency	
Communicating with your customers	 Each menu item name and description should reflect potential allergenic ingredients Communicate any recipe changes to all staff 	

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Monitoring

Once you have completed your House Rules for Allergen Management, you must then monitor them in use. Keep a record of the monitoring that you carry out. This can be done by using the **Weekly Record** (refer to the **Records** Section in this manual).

Corrective Action

If you find that your Allergen Management House Rules are not being followed, you must make a record of the problem you have identified and the action you have taken to correct it. This information can also be entered in the **Weekly Record**.

Training given in Allergen Management should be recorded on the training record. An example of atraining record can be found in the **Training House Rules** sub-section of this manual.

Action Plan

Once you have completed all your House Rules, remember to update your Action Plan and brief all staff on the House rules

The Allergen Management House Rules are an essential component of your HACCP based system and must be kept up to date at all times. Your House Rules need to be written to accurately reflect how you run your business and be readily understood by all food handling staff.

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Allergen Management House Rules

Enter a statement of your Allergen Management House Rules in the table below:

	Allergen Management House Rules Describe: • Control Measures and Critical Limits • Monitoring including frequency
Standard Recipes & recording of information	
Incoming Deliveries and labels	
Storage and avoiding cross contamination	
Preparing Foods	
Serving Foods	
Staff Training	
Communicating with your customers	
Outgoing Deliveries	
What to do in the event of an emergency	
Monitoring/checking and any other appropriate records used by your business	Weekly Record
Signed	
Date	

The Allergen Management House Rules are an essential component of your HACCP based system and must be kept up to date at all times

MenuCal Template

Recipe Title:

Recipe Name:		Servings per Recipe:			
Ingredient – Detail all ingredients used including herbs & any sauces or garnishes	Brand Name	Allergens	May Contain Allergens	Quantity Weight / Volume	Notes

Name of Food
INGREDIENTS: