

# Allergens Management, Control and Communication

## Frequently Asked Questions

Note: the advice and guidance given below in relation supply of safe food to consumers who have food allergies, should where appropriate apply similarly for those who suffer with conditions such as coeliac disease or other declared food intolerances.

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### **Q1. What is the difference between a food allergy and a food intolerance?**

A1. When someone has a food allergy, their immune system wrongly sees the food as hostile and the body's defence mechanism springs into action. This produces a range of symptoms which can vary from mild itching to severe breathing difficulties or even shock. These symptoms usually happen immediately after eating the food. Some forms of severe food intolerance, such as coeliac disease also involve the immune system and can have different acute effects.

Generally, when someone is intolerant to a food, the immune system is usually not involved and symptoms take much longer to develop and are generally not life-threatening. However, a food intolerance can adversely affect long-term health.

## Q2. When does a potential allergenic food ingredient, become a food contaminant?

A2. When the food ingredient is specifically **not intended** to be used in the manufacture or preparation of a food and **yet is still present** in the finished product, even if in an altered form.

Note:

Food Ingredient = 'ingredient' means any substance or product, including flavourings, food additives and food enzymes, and any constituent of a compound ingredient, used in the manufacture or preparation of a food and still present in the finished product, even if in an altered form; residues shall not be considered as 'ingredients'.

Food Contaminant = 'contamination' means the presence or introduction of a hazard; in respect of allergenic hazards found in catering operations, these can be considered to take two forms:

- a. Ingredient-level contaminants = Allergenic ingredients normally present and declared in the food, that should have been removed from food by alternative preparation and **that have been declared not to be present as an intended ingredient;**  
and/or,
- b. Cross-contamination-level contaminants = Allergenic food ingredients or residues **which are inadvertently present** in the food due to direct or indirect cross-contamination during handling, preparation and service.

## Q3. Can I have a simple example of how a 'food ingredient' normally in a menu item might become an 'allergenic food contaminant'?

A3. A takeaway offers a standard burger and chips meal which includes the following allergenic ingredients:

- Standard Bread Bun – **wheat/gluten, sesame**
- Burger – **wheat/gluten, soya, egg**
- Burger Relish – **mustard**
- Lettuce leaf garnish

A customer wants a standard burger, but asks about any sauce or relish that may come with it, because he is allergic to mustard. After checking with the order cook and the ingredient matrix, the counter staff tell the customer that the burger relish contains mustard. So the customer orders a burger without relish (**mustard**).

The staff explain that the burger can be provided without relish (**mustard**) as an ingredient, but despite their best efforts avoidance of cross-contamination cannot be completely guaranteed due to the nature of the catering operation. The customer is happy to have the burger on this basis.

Now one of two events may happen:

1. The standard burger is supplied to the customer without the relish (**mustard**) as an ingredient, as ordered, and actually there is no relish (**mustard**) in the burger – everyone is happy.
2. The standard burger is supplied to the customer as being without the relish (**mustard**) as an ingredient, as ordered, but actually there is relish (**mustard**) in the burger – now the relish (**mustard**) which is normally an ingredient has become an allergenic food contaminant due to the presence of mustard as a secondary ingredient. The food is potentially unsafe for this particular customer and is certainly not of the substance explicitly demanded by customer – so no one should be happy with this.

The questions that now arise are about the nature and extent of the presence of relish (mustard) in the burger.

- Was the relish (**mustard**) there at an ingredient-level due to errors of ordering/preparation/service which meant that the burger had actually just been handled the same as any other standard burger? or;
- Was the relish (**mustard**) there due to inadvertent cross-contamination, (usually at a lower level)? and;
- In which case was this reasonably avoidable?

Cross contamination can also occur and below are some examples of cross contamination.

- The same fryer may be used to fry Prawn toast containing sesame seeds and chips. The chips may then become contaminated with sesame which is a known allergen.
- The same board may be used to chop celery and prepare sandwiches on, if the board is not thoroughly cleaned the sandwich may be contaminated with celery.

Accidental contamination may happen an example of this is:-

- Chef A prepares a base sauce which does not contain peanut for example, chef B prepares the same base sauce however chef B uses a different recipe which does contain peanut. Using a single recipe for each dish can prevent this from happening and will make it easier to ensure allergen information is accurate.

#### **Q4. What are 'secondary ingredients' and 'hidden contaminants'? Can you give me an example of each?**

A4. The **ingredients of a composite product** when used as a **main ingredient** to create a dish are known as **secondary ingredients**. The term secondary refers to a second tier of ingredients that are not immediately apparent in a list of main ingredients. As these secondary ingredients could potentially include allergens it is important that you check them.

A composite product is one made from multiple ingredients.

A hidden contaminant is identified by statements such as 'may contain' on pre-packaged products used in your recipes and refers to something that is unintentionally in the product.

For example making a basic Chilli Con Carne:

**Main Ingredients:** Beef mince, tinned tomatoes, generic beef stock cubes (composite product), red kidney beans, spices (paprika, cumin).

As the stock cube is a composite product we need to check its ingredients for allergens. The ingredients of this product are **secondary ingredients**.

**Generic beef stock cube ingredients:** Salt, vegetable fats (palm, shea butter, sal butter), potato starch, sugar, beef extract (4%), yeast extract, flavourings, onion powder, caramel syrup, maltodextrin, parsley, carrots, spices (parsley roots, **CELERY** seeds).

This information must be transferred to your final product allergen declaration.

In addition to these ingredients the stock cube has the following information on the label:

May contain **WHEAT, MILK**

These are the hidden contaminants. This allergen information must be transferred to your final product allergen declaration.

So the Chilli Con Carne contains **Celery** as a secondary ingredient and it may contain **Wheat** and **Milk** as hidden contaminants.

**Q5. What practical steps can I take in a typical restaurant kitchen to avoid food allergen cross-contamination when there are numerous different ingredients and dishes being handled and prepared in my kitchen before and across a busy service period? It seems like an almost impossible ask...**

A5. There are some simple controls that can be adopted to help reduce the chances of cross-contamination as far as reasonably practicable, these might include:

- storing ingredients and prepared foods separately in closed and labelled containers
- keeping ingredients that contain allergens separate from other ingredients
- cleaning utensils before each usage, especially if they were used to prepare meals containing allergens
- washing hands thoroughly between preparing dishes with and without certain allergens
- having separate work surfaces, chopping boards and utensils for foods prepared without certain specified allergens

but you're right your kitchen is not like a food factory, which is why it's usually **not** advisable to suggest you can produce a meal which is guaranteed 'allergen free' or described as '*...free from...*'. **So if you can't avoid cross-contamination, you should tell you customers you can't provide an 'allergen-free' dish.**

**Q6. What if a customer is allergic to an ingredient that is not included in the 14 allergens or if they have other dietary requirements such as Coeliac disease?**

You must ensure that the food that you serve to customers is safe. If you are made aware of other allergens/dietary requirements you should ask the customer what their requirements are. You then need to follow the same principles for allergen management, control and communication. (see also Q1 above).

**Q7. Can I request an advice visit from an officer to help me?**

A7. There is a lot of information readily available on food allergens from several sources, which should be sufficient for most food business operators to put in place appropriate food allergen management controls and provide necessary information to customers. Please refer first to the advice and links available elsewhere on these web-pages or those of the Food Standards Agency.

If you still feel you need further direct advice this may be obtained from Food Service officers subject to availability. However, a full cost recovery re-charge will usually be raised for this service. Food Services fees and charges are detailed here:

[\*\*Food Services Fees and Charges \(pdf 45kb\)\*\*](#)

**Q8. I have never had a customer ask about allergens – Does this apply to my business?**

A8. Food information and food hygiene regulations apply to all food businesses. There are no exceptions, therefore it is important that you familiarise yourself with the information provided on our web pages to enable you to put in place the appropriate controls for your business.

## **Q9. What food allergen training do I need to give my staff?**

A9. Your staff should:

- know the procedures and policies when asked to provide allergen information;
- be able to ensure that customers who are declared food allergy sufferers are provided with safe food;
- have training and instructions on handling allergy information requests;
- be able to respond appropriately to requests for an 'allergen-free' meals request and understand why in most catering situations this cannot usually be achieved;
- know the risks of allergen cross-contamination when handling and preparing foods and how to prevent this.

The FSA provide free of charge [food allergy online training](#) where you and your staff can learn more about food allergies and the allergen information rules.

## **Q10. Can I simply refuse to serve a customer who tells me they are allergic to a certain food?**

A10. It is always up to the Food Business Operator who they serve. However you have an obligation to be able to accurately inform your customers which of the 14 allergens are ingredients in any of the foods that you serve. You should also do all you can to prevent any accidental contamination or cross contamination of foods with allergens. If after carrying out an assessment and taking all reasonable steps to control contamination by allergens it is not possible to produce the food requested then this must be communicated to your customer with the reasons and a refusal to provide the item.

## **Q11. As a caterer do I have to provide information about ingredients other than the 14 food allergens specified in food information regulation?**

A11. In legal terms the answer is 'No', the regulations only make the provision of information about the 14 specified food allergens mandatory. But you may still find it embarrassing and unhelpful to tell customers you don't know, or won't tell them, what is in the food you are serving them. **In every case you must ensure the food you supply is safe for the consumer.**

## **Q12. I don't provide my customers ingredient information, until they tell me they have a food allergy, but then I check and let them know, is that alright?**

A12. Under food information regulations caterers must provide information about the intentional presence of 14 specified allergenic ingredients in the food they supply, this can be orally or in writing. Where they elect to provide this information orally, there must at least be appropriately placed notices advising customers of this (see below).

# FOOD ALLERGIES AND INTOLERANCES

**Please speak to a member of staff about the ingredients in our dishes before placing your order.**

*We follow good hygiene practices in our kitchen however, whilst a dish may not identify a specific allergen as an actual ingredient, due to the wide range of ingredients used in our kitchen, foods may be at risk of cross contamination by other ingredients. Please ask our staff for further information.*

**Q13. Where can I find out more about what I need to do as a food business operator to protect my customers suffering with a food allergy or intolerance?**

A13. Some useful reference links to further advice and guidance include:

- <https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses>
- <https://allergytraining.food.gov.uk>
- <https://www.food.gov.uk/sites/default/files/media/document/loosefoodsleaflet.pdf>
- [https://www.fdf.org.uk/corporate\\_pubs/brc-free-from-guidance.pdf](https://www.fdf.org.uk/corporate_pubs/brc-free-from-guidance.pdf)
- <https://www.eastriding.gov.uk/business/food-services/>
- <https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-allergens-and-intolerance>
- <https://www.allergyuk.org/information-and-advice/for-caterers>
- [https://www.allergyuk.org/assets/000/001/238/Guide to Food Allergy Catering original.pdf](https://www.allergyuk.org/assets/000/001/238/Guide%20to%20Food%20Allergy%20Catering%20original.pdf)
- <https://www.nhs.uk/conditions/anaphylaxis/>
- <https://www.coeliac.org.uk/food-businesses/caterers-and-restaurateurs/gluten-free-and-the-law/>