



FOOD  
STANDARDS  
AGENCY



## Who is this booklet for?

This booklet is for businesses producing pre-packed foods.

It will help you decide what you should put on the label if foods you produce may contain foods that some people are allergic to. It contains some information on legal requirements and some on good practice.

### **Food labelling, allergies and the law**

Food must not be placed on the market if it is 'injurious' (harmful) to people's health. See Article 14 of EC Regulation 178/2002 (General Food Law Regulation).

Food labelling information is important in deciding if a food is safe to eat. Food with incorrect food allergy information would not be safe for someone who is allergic to that food.



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## Food allergies

Some people are allergic to certain foods. For them, eating these foods could make them ill and may even be life threatening.

### ALLERGENS

The substance in a food that causes an allergic reaction in certain people is called an allergen. Allergens are normally proteins and there is usually more than one kind of allergen in a food.

An allergic reaction can be produced by a tiny amount of the ingredient that a person is sensitive to (for example, a fragment of peanut or just one or two sesame seeds).

Symptoms of an allergic reaction include stomach upsets, rashes, itching of the skin or mouth, swelling of the throat and difficulties breathing. Around 10 people a year in the UK die from allergic reactions to food.

## WHICH FOODS SHOULD I CONSIDER?

Although people can be allergic to a wide variety of foods, there are certain foods that it is particularly important to consider when labelling products.

All pre-packed food sold in the UK has to clearly show on the label if it contains one of the following as an ingredient (or if one of its ingredients contains, or is made from, one of these):

- peanuts
- nuts (almonds, hazelnuts, walnuts, Brazil nuts, cashews, pecans, pistachios, macadamia nuts and Queensland nuts)
- eggs
- milk
- crustaceans (including prawns, crab and lobster)
- molluscs (including squid, mussels, cockles, whelks and snails)
- fish
- sesame seeds
- cereals containing gluten (including wheat, rye, barley and oats)
- soya
- lupin
- celery
- mustard
- sulphur dioxide/sulphites (preservatives used in some foods and drinks) at levels above 10mg per kg or per litre

Other foods that can cause allergic reactions may be added to this list in the future.

Some food ingredients made from these foods will not cause an allergic reaction because they have been refined (e.g. refined soya oil) and so do not have to be labelled. For more information on the legislation, contact the trading standards service at your local authority.

## WHAT DOES 'PRE-PACKED' MEAN?

'Pre-packed' refers to any food put into packaging before being put on sale, when all the following things apply:

- the food is either fully or partly enclosed by the packaging
- the food cannot be altered without opening or changing the packaging
- the product is ready for sale to the public or to a catering establishment

The term 'pre-packed' also covers foods that are enclosed and intended to be cooked without opening the packaging.

However, it does not include individually wrapped sweets or chocolates that are not enclosed in any further packaging and are not intended for sale as individual items.

**There are certain foods that it is particularly important to consider when labelling products**



## Cross-contamination

Sometimes traces of the foods that some people are allergic to can get into products by accident, during the manufacturing process or during transport or storage. This is called 'cross-contamination.'

Ideally, you should prevent this from happening (see the section 'How can allergen cross-contamination be avoided?' on page 6). But in some circumstances this may not be possible, so some manufacturers choose to say on the label that a certain food could have got into the product by accident. This is called advisory labelling.

### ADVISORY LABELLING


If you think there is a real possibility of a food product being affected by cross-contamination with an allergen, it is good practice to say so on the label using one of these phrases:

- 'may contain X'
- 'not suitable for someone with X allergy'

This means that even though the allergen has not been deliberately added to the product, you cannot be sure that it does not accidentally contain small amounts.

Advisory labelling should only be used when, following a thorough risk assessment, you think there is a real risk of allergen cross-contamination.

Consider using one of these phrases – 'may contain X' or 'not suitable for someone with X allergy'



How can allergen cross-contamination be avoided?

There are several ways cross-contamination can occur, but with careful management many of these risks can be avoided or reduced. Some of the areas to think about are described below.

### STAFF AWARENESS

All staff involved in handling ingredients, equipment, utensils, packaging and final food products should be aware of the situations in which foods can be cross-contaminated by an allergenic food.

### DESIGN

The ideal approach to avoiding cross-contamination with allergenic foods is to have separate production facilities for specific products. Alternatively, you may be able to make the food containing the allergenic food on a separate day, or at the end of the day, and then thoroughly clean the production area. However, food manufacturing premises and product ranges vary greatly and these approaches are not always an option.

## STORAGE

Where possible, allergenic raw materials should be stored away from other ingredients, for example in sealed plastic bins that are clearly marked or colour-coded.

## SOURCING YOUR INGREDIENTS

You should find out about the allergens present in the ingredients you use and of those used by your suppliers. Any change in supplier should be accompanied by the appropriate checks. It may be possible to manage the risk of cross-contamination by changing a particular ingredient that contains an allergen or by changing the supplier.

## CLEANING

Very small amounts of some allergens, such as nuts, can cause severe allergic reactions in sensitive people. That is why it is so important to clean thoroughly in a way that reduces the risk of cross-contamination. Cleaning practices that are satisfactory for hygiene purposes may not be adequate for removing some allergens.

There may be times when equipment may need to be dismantled and cleaned by hand to make sure that hard-to-clean areas are free from allergen residues. Even dust contamination by some allergens can cause an adverse reaction in some people.

It is a very good idea to develop and follow a suitable cleaning schedule. This will help minimise allergen cross-contamination and reduce the likelihood of product recalls.

## PACKAGING

Incorrect packaging and/or labelling is often the cause of allergy-related product recalls. It is vital to make sure that the correct labels are applied to products and any outer packaging. This should be checked regularly, so that accurate information is provided to allergic consumers.

Packaging should be removed and/or destroyed at the end of a production run, including any packaging that may be within the wrapping machine. This is to avoid packaging mix-ups when the product is changed.

## DEVELOPING NEW PRODUCTS OR CHANGING EXISTING PRODUCTS

If you start making a new product, or change an existing product, this might mean you could be handling an allergenic ingredient you have not used before. This could lead to cross-contamination of other products produced in the same premises. You will need to assess the risk and decide whether advisory labelling is appropriate for both the new and existing products.

**You should assess the risk of allergenic ingredients getting into foods before you decide to print a warning on the label.**

**It is vital to make sure that the correct labels are applied to products.**



## Allergy-free foods

Some food manufacturers and retailers provide special ranges of foods made without certain common allergenic foods, such as milk, egg or cereals containing gluten.

Some manufacturers choose to exclude certain allergens from their premises. If you are going to print a claim on a label such as 'free from milk' or 'made in peanut-free factory,' it is essential that the claim is based on specific, rigorous controls.

This includes checking that all ingredients, and anything else that comes into contact with the food (such as packaging materials), do not contain the particular allergen.

*If you are going to print a claim on a label, it is essential that the claim is based on specific rigorous controls*

## Further information

- The Food Standards Agency's *Voluntary Guidance on Allergen Management and Consumer Information* is available at:  
[www.food.gov.uk/multimedia/pdfs/maycontainguide.pdf](http://www.food.gov.uk/multimedia/pdfs/maycontainguide.pdf)  
or from FSA Publications  
(see the ordering information on the back cover of this booklet).
- Guidance on the legislation on the labelling of allergenic ingredients is available at:  
[www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/allergenlabelguide2008](http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/allergenlabelguide2008)
- Relevant legislation includes:  
The Food Safety Act 1990 and subsequent amendments  
The Food Labelling (Amendment) (No. 2) Regulations 2004 (and subsequent amendments), which implement Directives 2000/13/EC, 2005/26/EC, 2005/63/EC, 2006/142/EC and 2007/68/EC.  
Food safety requirements and presentation under Articles 14 and 16 of EC Regulation 178/2002 (General Food Law Regulation)

The FSA would like to thank the Forum for Private Businesses for their support in producing this booklet.

For further information and advice about food,  
visit the Food Standards Agency's websites:

**[eatwell.gov.uk](http://eatwell.gov.uk)**

**[food.gov.uk](http://food.gov.uk)**

**[salt.gov.uk](http://salt.gov.uk)**

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