

Executive Summary - SME allergen provision in the non-prepacked sector

Results available: Results available

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This report presents the findings of qualitative research commissioned by the Food Standards Agency (FSA) and delivered by Basis Social. More specifically, the research had four objectives to understand:

- How SMEs currently provide allergen information to consumers and the reasons for this approach.
- The challenges SMEs face in managing allergen cross-contact.
- The challenges SMEs face in providing accurate allergen information to consumers.
- The challenges and benefits of a range of different options for providing allergen information to consumers.

To achieve these objectives, Basis Social designed and delivered a programme of research consisting of three workstreams:

- online interviews with 30 SME food businesses.
- short (2-3 hr) face-to-face ethnographic deep dives with an additional 10 SME food businesses.
- online interviews with 6 representatives of trade bodies working with SMEs.

Each of these workstreams was conducted simultaneously, with fieldwork taking place between January and February 2023.

How SMEs currently provide allergen information to consumers, and the reasons for this approach

The research found that SMEs communicate allergen information using different methods and approaches. The most common approach followed by businesses that took part in this study was to use written signs prompting customers with FHS requirements to identify themselves. Once a customer does so, businesses talk to them to gain a better understanding of their requirements and to determine whether any solutions or alternatives that are safe for the customer to eat are available. However, different approaches were also identified. These included (but were not limited to):

- Signposting using a menu rather than a standalone sign

- Including written information about allergens on a menu, either by including a list of ingredients or indicating allergens that are present
- Using labelling on pre-made products and dishes to present allergen information
- Asking each and every customer whether they have any FHS requirements
- Only asking specific customers whether they have any FHS requirements in response to certain prompts, for example, if a customer shows interest in an allergen-free product

The research highlighted how business owners and staff's beliefs affected their choice of what method of communication to use. Business owners and staff use methods of communication that they believe will be effective in improving customer safety and will enhance the quality of customer relations and visual appeal of the business overall. However, businesses sometimes hold differing opinions about what methods best fit with these criteria. Furthermore, these opinions are also influenced by beliefs about how prevalent food hypersensitivities are within the population, and beliefs about what FHS customers will do and should do regarding their food hypersensitivity and eating out.

The research also showed that decisions about which approach to take are affected by the characteristics of the business itself. Characteristics found to influence these decisions included:

- service model - for example, businesses using a table service model were distinctive for using menus to communicate allergen information, and for requiring servers to ask each and every customer if they have any FHS requirements.
- business size - businesses with more staff who performed specialised roles (e.g. Chef, Front of House etc) were more likely to use written documentation (such as food matrixes) and encourage communication between kitchen and front-of-house staff to ensure that the relevant information is accessible to the staff member or customer who needs it.
- service environment - businesses with busy and fast-paced service environments reported concerns about the feasibility of asking each customer about their FHS, and preferred to use either signposting approaches or proactive written communication to inform customers about allergens.
- dishes and products served - dishes with lots of ingredients were considered as requiring more time and effort to identify and include relevant allergen information on menus. Businesses with menus that change regularly, or which make dishes to order, considered including allergen information on menus impractical due to the sheer number of potential dishes which customers could order.
- the media (for example, menus, signs, labels) a business uses to advertise product and dishes – for example, businesses with small menus reported that it would be impractical for them to include allergen information on the menu.

The research also found evidence of businesses using certain methods because they presented a lower financial and/or time cost option compared with alternatives.

The challenges SMEs face in managing allergen cross-contact

This research shows that cross-contact risk management occurs at multiple points, from the design of menus through to food preparation, food storage, food display and the service of food to the customer. The research also illustrated how businesses try to ensure that staff have undergone formative education and training in food safety, for example by requiring staff to complete food safety qualifications.

In terms of challenges associated with managing allergen cross-contact effectively, the research indicates that SMEs may face a range of barriers that contribute to staff lacking the requisite levels of knowledge to manage cross-contact risks effectively. These barriers may be

exacerbated by a lack of opportunities for SMEs to hire well-trained staff and access standardised, practical training. Businesses with access to accredited training providers, that receive prompts reminding them to update their knowledge, and who can retain and employ staff with a long tenure in food service are best placed to overcome these capability barriers.

The research also suggests that some businesses preparing food in small kitchens and serving dishes from small service areas find it difficult to control cross-contact risks. To overcome this barrier, there is evidence of businesses preparing food in stages and cleaning surfaces and utensils between each stage. To control risk at the food preparation stage, some businesses order products (such as gluten-free cakes) that are safe for customers with specific FHS requirements to eat from third parties, thereby ensuring that these products are made in an allergen-free environment. To control risk at the service stage, some businesses pack allergen-free products to ensure they do not come into contact with other products on display.

Finally, some SMEs may be reliant on local cash and carries or other smaller suppliers to source ingredients as and when they need them. This means that certain ingredients are more likely to be unavailable at short notice, and therefore these businesses are forced to make substitutions more regularly. This can have a significant impact on a business's ability to plan out process for separating and managing cross-contact risks when preparing non-prepacked food items.

The challenges SMEs face in providing accurate allergen information to consumers

The research found evidence of businesses using a mix of different methods for ensuring the accuracy of the allergen information they provide to customers. These methods can be classified according to when they occur (that is, before or after a customer has notified the business about an FHS requirement) and how the information is communicated (verbally or in writing). Examples of methods classified at different points along these two dimensions included:

- Using written information/food matrices to inform staff about allergen risks (proactive, written)
- Talking with suppliers to identify allergen risks present in deliveries (proactive, verbal)
- Using a label or sticker on a food item when it is given to customer to confirm that it has been made allergen free (reactive, written)
- Verbally communicating customer FHS risks to kitchen staff (reactive, verbal)

The research also highlighted a range of barriers which can limit the capability of staff to provide accurate allergen information to customers. Limited and inconsistent staff knowledge about what allergens are present in the dishes served by the business may be exacerbated by factors including insecure supply chains; missing, out-of-date or incomplete written information on allergens; and more knowledgeable staff being too busy to educate other staff to the requisite standard. Strategies employed by FBOs to try and overcome capability barriers include training staff, giving them access to comprehensive, written allergen information, and ensuring good lines of communication from kitchen to customers.

It is important, however, to note that the costs of creating and updating written allergen information mean that some businesses may not have such information to hand. Moreover, using small and non-durable materials for communicating written information may limit the accuracy of the information provided. Both challenges may be overcome by investing in technology for managing allergen information, however, these can also carry a high price tag and require upfront investments in terms of time.

The challenges and benefits of a range of different options for providing allergen information to consumers

This research tested six potential options for standardising how small- and micro-food businesses selling non-prepacked food could communicate allergen information to customers. The options were as follows:

1. Food businesses to provide a full, written list of ingredients for each dish on the menu
2. Food businesses to provide a full, written list of ingredients for each dish in a separate booklet
3. Food businesses to indicate the presence of any of the 14 regulated allergens in each dish on the menu
4. Food businesses to provide a written notice on a menu or next to the information consumers are using to select their food asking people with allergies or intolerances or coeliac disease to notify staff before ordering food
5. Food businesses to verbally ask all customers whether they have any food allergies or intolerances or coeliac disease
6. Food businesses to verbally confirm to the customer when the food is being served that a dish that has been requested to be free of a particular allergen has been made in such a way as to be free of that ingredient.??

Feedback from businesses and trade body representatives showed that there is currently no clear winner in terms of the options provided. No option drew unanimous support from all businesses and trade bodies, and all received at least some negative feedback in terms of their acceptability, practicality, effectiveness, affordability, potential for unintended consequences, and equity.

However, feedback did indicate somewhat stronger consensus around the unacceptability of including a full, written list of ingredients on menus. This option was negatively received by most businesses except those serving a small number of dishes with limited ingredients. It was generally considered impractical, as well as potentially ineffective by some. FBOs also suggested that it may disadvantage certain types of businesses, such as businesses who are protective of their recipes.