Precautionary allergen labelling checklist

A checklist to help businesses understand when and how to apply precautionary allergen labelling to food products.

A food business should follow the steps outlined below before applying a precautionary allergen label (PAL) such as '**may contain**'.

This is to ensure that a PAL is communicating an unavoidable risk of unintended allergen cross-contamination that a food business has not been able to sufficiently control.

Indiscriminate use of PAL without following these steps can limit food choice for consumers with a food allergy or hypersensitivity, potentially unnecessarily restricting their diet and impacting upon their health and quality of life.

Use of a generic PAL without following this process, such as using a generic 'may contain allergens' label, can mislead consumers.

This can lead to mistrust in the warning and consumers taking risks to increase their food choice, resulting in unexpected adverse allergic reactions.

Tips
We have more detailed information on precautionary allergen labelling in our precautionary allergen labelling guide.

We have provided a checklist to help businesses understand when and how to apply precautionary allergen labelling to food products:

1. Identify the potential sources of allergens

Consider any potential sources of allergens in the foods and ingredients that enter your premises

Review precautionary allergen information from your suppliers and pass this information on to the final consumer. (Query this information with the supplier if you doubt it).

2. Remove or substitute allergens

Consider where allergens could be removed or substituted from the food product. For example, this could be by using poppy seeds as opposed to sesame seeds.

3. Identify points of allergen cross-contact

Identify risks of allergen-cross contact (defined in Step 1). For example, this could be the points during food processing where allergens could contaminate food products. This can be done as part of the Hazard Analysis at Critical Control Point (HACCP) risk management process considered as part of the Food Hygiene Rating Scheme (FHRS).

4. Separate allergens

Separate allergens from other ingredients where possible. For example, this could be by having separate storage production areas and utensils to avoid-cross contamination.

5. Clean points of allergen cross-contact

If the risk of allergen-cross contact cannot be avoided by separating allergens from other foods, remove or mitigate the risk with cleaning practices. This should include validation in the form of visual inspection. Testing should also be applied where possible. More details on managing allergen cross-contact can be found in Safer food, better business (SFBB) (or Safe catering in Northern Ireland).

6. When to apply PAL

Using a PAL is advisable when an unavoidable and real risk of allergen cross-contact is identified that cannot be removed through risk management actions, such as separation or cleaning.

7. How to apply PAL

Precautionary allergen statements for example, ‘’may contain x’’ or ‘’not suitable for consumers with x allergy’’ can be included on the label of prepacked food. Information on the unintended presence of allergens can also be communicated by other means for non-prepacked foods, such as orally, by staff or on clear display at the premises.

8. Review

Regularly review the products to which you apply a PAL, particularly when ingredient suppliers, recipes, or on-site practices change.

Definitions

Food hypersensitivity includes food allergy, food intolerance, and coeliac disease.

Allergen means an otherwise harmless protein which is found in food. An allergen is capable of triggering an immune response that results in an allergic reaction in certain consumers.

Allergen cross-contact occurs when an allergenic food is unintentionally incorporated into another food that is not intended to contain that allergenic food.

The **14 mandatory allergens**:

- celery
- cereals containing gluten (such as barley and oats)
- crustaceans (such as prawns, crabs, and lobsters)
- eggs
- fish
- lupin
- milk
- molluscs
- mustard
- peanuts
- sesame
- soybeans

- sulphur dioxide and sulphites (if they are at a concentration of more than ten parts per million)
- tree nuts (such as almonds, hazelnuts, walnuts, brazil nuts, cashews, pecans, pistachios, and macadamia nuts