

FSA 22-06-07 Annex A - Summary of progress on FHS workstreams not discussed in detail in the paper

Summary of progress on the Food Hypersensitivity workstreams not discussed in detail in the main paper.

1. Implementation of prepacked for direct sale (PPDS) allergen labelling requirements – early survey results

In October 2021 new legislation requiring the labelling of PPDS foods came into effect. This legislation, also referred to as ‘Natasha’s Law’, requires all businesses selling PPDS foods to label these foods with the food name and a full list of ingredients, with allergens highlighted (for example, written in bold text).

A full evaluation of PPDS legislation implementation is planned to begin from October 2022. In the interim, we have been monitoring changes in awareness and compliance with this new legislation, [compared against baseline data gathered in 2020](#), through our ongoing tracking work, a light-touch ‘temperature check’ survey with food businesses selling PPDS foods and feedback from local authorities.

These activities were intended to act as an early warning system should implementation not be going well, rather than to robustly measure compliance. However, they indicate the direction of travel for awareness and compliance, with early signs that both have improved since October 2021. That said, these data also suggest that further work is needed to enhance and support awareness and compliance among micro and small businesses.

Awareness has risen from around two thirds of food businesses selling PPDS foods to between eight and nine in ten of businesses.

- our baseline research found 64% of businesses selling PPDS foods were aware of the upcoming change in legislation in 2020.
- findings from Wave 3 of our [Small and Micro Business tracker](#) which collected data immediately after the introduction of PPDS in October 2021 (fieldwork took place in November to December 2021), found 79% of micro and small businesses selling PPDS foods (n=175) were aware of the law.
- data from our independently recruited temperature check survey with 150 businesses selling PPDS foods (fieldwork in 25-29 March 2022) found 95% of respondents were aware, although we need to consider the sample size and an over representation of respondents with multiple sites (1 site: 11%; 2-4 sites: 43%; 5-10 sites: 31%; 11+ sites: 15%).

Compliance has also improved from six in ten businesses labelling all ingredients to eight in ten labelling all ingredients.

- our baseline work in 2020 found that 62% of food businesses selling PPDS foods were labelling all ingredients and 78% were labelling all allergenic ingredients ahead of the new PPDS requirements.
- findings from our recent temperature check survey with 150 food businesses selling PPDS foods found 81% respondents labelled all ingredients, with a further one in ten (9%) labelling allergenic ingredients only.

Local authorities appear to find interpreting, understanding and enforcing PPDS legislation manageable, although they have common concerns about compliance among micro and small businesses

- we asked environmental health (EH) and trading standards (TS) teams in local authorities (in England, Wales and Northern Ireland) for their views on enforcement and also compliance amongst FBOs of different sizes. At the time of writing, the FSA had received 92% of returns from EH teams and 89% of TS teams.
- 13% of TS teams and 16% of EH teams found it difficult or very difficult to interpret and understand the PPDS legislation.

In comparison 87% of TS teams reported their officers found interpreting and understanding PPDS legislation neither easy nor difficult (44%) or easy/very easy (43%). The figures were similar for EH teams, with 49% reporting it was neither easy nor difficult (49%) or easy/very easy (35%) to interpret and understand the PPDS legislation.

- 18% of TS teams and 22% of EH teams found enforcement difficult or very difficult.

In comparison 51% of TS teams found enforcing PPDS legislation neither easy nor difficult with a further 31% finding enforcement either easy or very easy. Figures for EH teams were slightly lower with half (49%) finding enforcement neither easy nor difficult and just under three in ten (29%) finding it easy/very easy.

- TS and EH teams both had concerns about levels of compliance among micro and small businesses, and far less concern about the compliance of large food businesses:

80% and 72% of TS and EH teams respectively had concerns about micro businesses.

63% and 58% respectively had concerns about small businesses.

19% and 11% respectively had concerns about medium sized businesses.

Just 5% and 4% respectively had concerns about large food businesses.

We expect that the planned evaluation of PPDS implementation will enable us to robustly measure levels of awareness and compliance amongst a representative sample of PPDS food businesses, capture patterns in awareness and compliance across nations and business size/type and will identify barriers and facilitators to compliance. We will also consider the views of local authorities and data on actions they have taken on PPDS. This will enable the FSA to consider what further guidance and resources might be needed to support compliance.

3. Programme stakeholder engagement and campaigns

We have continued to deliver programme stakeholder and communications activity:

- in March 2022 we launched a new 'Speak Up For Allergies' campaign aimed at young people and food businesses – this followed on the success of the first campaign in spring 2021. It is designed to encourage young people to support friends with allergies when

eating in restaurants, as well as highlight the important role front of house staff have when a young person with allergies dines in a restaurant.

- the 3rd FHS Symposium took place in March 2022 - a virtual FHS symposium for approximately 600 delegates.
- the FHS programme expert panel have provided input to a range of programme activity including the design and content of the PAL consultation.

4. Enhanced Training?

A 2020 FSA survey looking at the provision of allergen information to consumers within the food sector highlighted that only half of food businesses had received formal training (49%), with a lower uptake amongst smaller businesses. Whilst this had increased from 2012 (34%), there appears to be some way to go to achieve greater coverage.

To understand how the uptake of FHS training can be improved or enhanced, and what role FSA can play in this process, the FSA commissioned a desk-based scoping research exercise to investigate the current extent of FHS training available to UK food businesses.

A Rapid Evidence Assessment identified 18 pieces of literature related to UK provision of FHS training and 7 related to international recommendations for improvements to training:

- the literature identified a lack of resource from many companies in being able to facilitate FHS training due to the long hours worked across food service staff and economic constraints exacerbating the problem.
- the dissemination of training within businesses and poor communication was often found to be a barrier to lower-level staff accessing FHS training in many small and medium-sized businesses.
- the use of more behavioural-based, rather than knowledge-based training alone, to increase motivation and uptake by staff was also identified as a key area to explore.