

#2,758

COMPLETE

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Page 1: Background to this consultation

Q1 **Yes, I have seen the background information**

Please confirm that you have seen the background information to this consultation on the Food Standards Agency website. This is important because it provides the details you will need to know in order to respond to the questions in this consultation.

Page 3: Respondent Type

Q2 **On behalf of a business or organisation**

Which of the following best describes how you are responding to this consultation?

Page 4: About your business or organisation

Q3
What is the name of your business or organisation?

Institute of Food Science and Technology

Q4 **Yes**

Is this the official response from your organisation or business?

Q5 **Science or academic institution,
Charity or third sector organisation**
Which of the following describe the organisation or business you are responding on behalf of? (Please tick all that apply)

Page 5: About your business or organisation

Q6 **Respondent skipped this question**

Which best describes how food is packaged in your business? (Please tick all that apply)

Page 6: About your business or organisation

Q7 **Respondent skipped this question**

Do you provide training and support or advice on the following for your staff or members?

Page 7: About your business or organisation

Q8 **Respondent skipped this question**

Is your training on food hygiene and allergens provided separately in different courses or together in the same course?

Page 8: About your business or organisation

Q9 **Large: with 250 or more employees**

What is the size of your business or organisation?

Q10 **No**

Does your business currently apply precautionary allergen labelling? For example, 'May contain...' or 'Packed in a factory where...'

Q11 **Wales,
Northern Ireland,
North East England,
North West England,
Yorkshire and the Humber,
East Midlands,
West Midlands,
East of England,
London,
South East England,
South West England**

Which countries and regions does your organisation cover? (Please tick all that apply)

Page 9: About you

Q12 **Respondent skipped this question**

Do you have, or do you care for someone with a food hypersensitivity (allergy, intolerance or coeliac disease) relating to any of the following allergens? (Please tick all that apply)

Q13

Respondent skipped this question

What is your sex?

Q14

Respondent skipped this question

Is the gender you identify with the same as your sex registered at birth?

Q15

Respondent skipped this question

What is your age?

Page 10: About you

Q16

Respondent skipped this question

What is your ethnic group?

Page 11: About you

Q17

Respondent skipped this question

Which of the following best describes your White background?

Page 12: About you

Q18

Respondent skipped this question

Which of the following best describes your Mixed or Multiple ethnic groups background?

Page 13: About you

Q19

Respondent skipped this question

Which of the following best describes your Asian or Asian British background?

Page 14: About you

Q20

Respondent skipped this question

Which of the following best describes your Black, African, Caribbean or Black British background?

Page 15: About you

Q21

Respondent skipped this question

Which of the following best describes your background?

Page 16: About you

Q22

Respondent skipped this question

What is your main language?

Q23

Respondent skipped this question

Which country do you live in?

Page 17: About you

Q24

Respondent skipped this question

Which region of England do you live in?

Page 18: About you

Q25

Respondent skipped this question

Do you have any educational qualifications for which you received a certificate?

Page 19: About you

Q26

Respondent skipped this question

Do you have any professional, vocational or other work-related qualifications for which you received a certificate?

Page 20: About you

Q27

Respondent skipped this question

Was your highest qualification?

Page 21: About you

Q28

Respondent skipped this question

In the last seven days, were you doing any of the following? Include casual or temporary work even if only for one hour

Page 23: Theme 1: Information Provision to Consumers

Q29

Yes

Should precautionary allergen labelling statements follow a standardised format, so that the format and wording is consistent across all prepacked foods?

Q30

Somewhat effective

How effective is the statement 'May contain [allergen]' at explaining this risk?

Q31

Unsure

How effective is the statement 'Made/produced in a factory where [allergen] is used' at explaining this risk?

Q32

Very effective

How effective is the statement 'May be present: [allergen]' at explaining this risk?

Q33

Not effective at all

How effective is the statement 'Cannot be guaranteed to be [allergen] free' at explaining this risk?

Q34

Somewhat effective

How effective is the statement 'Not suitable for those with an allergy to [allergen]' at explaining this risk?

Page 24: Theme 1: Information Provision to Consumers

Q35

Cross-contamination

To better communicate the risk that an allergen may be unintentionally incorporated into another food the terms 'cross-contamination' or 'cross-contact' could be used. Which phrase most clearly describes this risk?

Page 25: Theme 1: Information Provision to Consumers

Q36

Very effective

May contain [allergen] due to risk of cross-contamination

Q37

Slightly effective

Risk of cross-contamination, as made/produced in a factory where [allergen] is used

Q38 **Very effective**

May be present due to cross-contamination: [allergen]

Q39 **Not effective at all**

Cannot be guaranteed to be [allergen] free due to cross-contamination

Q40 **Unsure**

Not suitable for those with an allergy to [allergen] due to cross-contamination

Page 26: Theme 1: Information Provision to Consumers

Q41 **I am not sure how a consumer would interpret this**

If a product does not have a precautionary allergen labelling statement how do you think a consumer with a food hypersensitivity would interpret this?

Q42 **Yes**

Should text font size be standardised on precautionary allergen labelling to increase clarity?

Q43 **Yes**

Should text font style be standardised on precautionary allergen labelling to increase clarity?

Q44 **Yes**

Should text being highlighted for emphasis be standardised on precautionary allergen labelling to increase clarity?

Q45 **Yes**

Should where a precautionary allergen label is located on the packaging be standardised to increase clarity?

Page 27: Theme 1: Information Provision to Consumers

Q46 **Yes**

Do you agree that further information should be provided on why precautionary allergen labelling has been used on a product?

Page 28: Theme 1: Information Provision to Consumers

Q47

No

Would a two-tiered approach (as described above) for precautionary allergen labelling be helpful in providing consumers with more information?

Page 30: Theme 1: Information Provision to Consumers

Q48

Which of these types of further information should be provided (if any)? (Please tick all that apply)

The allergen that could have been unintentionally incorporated within this food

,

How this cross-contamination could happen,

Actions taken by the company to reduce this risk,

The risk that remains following any actions taken (for example, "Whilst this product does not contain milk as an ingredient there is a risk it could be present due to cross-contamination within the factory that controls do not fully mitigate")

,

Other (please specify):

The information link should be signposted on the label

Page 31: Theme 1: Information Provision to Consumers

Q49

Does not communicate this at all

In a catering setting, how well does the statement, 'All staff involved with preparing the meal of a customer will be made aware of the customer's allergen requirements' communicate that allergen cross-contamination is being managed effectively?

Q50

Partially communicates this

In a catering setting, how well does the statement, 'All staff are trained on allergens and food hypersensitivity and we regularly check in on staff practice' communicate that allergen cross-contamination is being managed effectively?

Q51

Partially communicates this

In a catering setting, how well does the statement, 'Allergenic ingredients and foods are stored separately on the premises and labelled clearly' communicate that allergen cross-contamination is being managed effectively?

Q52

Does not communicate this at all

In a catering setting, how well does the statement, 'Separate utensils and equipment (for example, spatulas, trays, cutting boards) are used for customers with a food allergy' communicate that allergen cross-contamination is being managed effectively?

Q53

Unsure

In a catering setting, how well does the statement, 'Allergenic foods for other people at your table will be labelled to avoid confusion' communicate that allergen cross-contamination is being managed effectively?

Q54

Does not communicate this at all

In a catering setting, how well does the statement, 'Where possible, foods are prepared in order of least allergenic to most allergenic to manage cross-contamination' communicate that allergen cross-contamination is being managed effectively?

Q55

Does not communicate this at all

In a catering setting, how well does the statement, 'We welcome feedback from customers about how well we've met your allergen needs. Please contact [XXX]' communicate that allergen cross-contamination is being managed effectively?

Q56

We have shown you some ideas that the FSA is considering around the provision of further information on precautionary allergen labelling. Do you have any additional comments you would like to be noted? (100 words maximum)

While some of these statements may be welcomed, none of these fully convey whether or not an effective allergen management procedure has been followed. These may give a false sense of security to a consumer and staff. Any statement should indicate the likelihood of presence following a proper risk assessment.

Page 32: Theme 2: Ensuring Compliance

Q57

Yes

Do you think a precautionary allergen label (or precautionary allergen information) should only be applied when there is an unavoidable risk of allergen cross-contamination that cannot be sufficiently controlled?

Page 33: Theme 2: Ensuring Compliance

Q58

Agree

Do you agree or disagree with the following key standard from the FSA - Precautionary allergen labelling may be misleading food information if it is applied without first assessing whether there is an unavoidable risk of allergen cross-contamination that cannot be sufficiently controlled?

Q59

Agree

Do you agree or disagree with the following key standard from the FSA - A precautionary allergen labelling statement that does not specify individual allergens may be misleading (for example, 'may contain allergens', or 'may contain nuts' without specifying whether individual tree nuts or peanuts)?

Q60

Agree

Do you agree or disagree with the following key standard from the FSA - A precautionary allergen label applied in conjunction with a 'free-from' claim for the same allergen may be misleading?

Page 34: Theme 2: Ensuring Compliance

Q61

Yes

Do you think that amendments to the Food Information for Consumers Regulation are needed to provide clarity on the legal requirements for the application of precautionary allergen labels?

Q62

We have asked you some questions around compliance with precautionary allergen labelling. Do you have any additional comments you would like to be noted? (100 words maximum)

More consideration is required concerning, e.g. potential confusion relating to gluten thresholds (coeliac) for communicating 'free from' as opposed to communicating wheat allergen risk; similar concerns could be raised for vegan labelling.

Page 35: Advice and guidance for food businesses and risk analysis of allergen cross-contamination

Q63

Yes

Would you like to answer questions on advice and guidance for food businesses, and risk analysis of allergen cross-contamination within food supply chains?

Page 36: Theme 3: Advice and Training

Q64 **Aware**

Are you aware of FSA food allergy and intolerance online training?

Q65 **Aware**

Are you aware of FSA precautionary allergen labelling guidance for small and medium food businesses with accompanying checklist?

Q66 **Not aware**

Are you aware of FSA technical guidance for detailed technical information currently provided by the FSA?

Page 37: Theme 3: Advice and Training

Q67 **Yes**

Are you aware of the guidance on the 4-step process of risk analysis for cross-contamination (above)?

Page 38: Theme 3: Advice and Training

Q68 **Somewhat useful**

How useful is this guidance in helping food businesses manage allergen cross-contamination?

Page 39: Theme 3: Advice and Training

Q69 **Yes**

Are you aware of the 8-point checklist on precautionary allergen labelling?

Page 40: Theme 3: Advice and Training

Q70 **Somewhat useful**

How useful is this guidance in helping food businesses to manage allergen cross-contamination?

Page 41: Theme 3: Advice and Training

Q71 **Yes (please name them):**
IFST guidance; BRCGS Section 5 (other standards may cover); Allergen Bureau (Australia / NZ); Brand owner standards; Sector specific standards

Q72

Agree

To what extent do you agree that the advice and guidance currently available to businesses is adequate to enable them to apply precautionary allergen labelling appropriately?

Q73

Do you think that any of the following advice and guidance should be required in relation to precautionary allergen labelling? (Please tick all that apply)

Food sector-based guidance - for example, catering, retail etc.

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Precautionary allergen labelling checklists relevant to specific business sectors - for example, for cheesemakers or restaurants

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Case studies showing real-life examples of food businesses following precautionary allergen labelling best practice

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Online training for businesses on how to apply precautionary allergen labelling

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In-person training on how to apply precautionary allergen labelling

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Specific guidance on the effectiveness of cleaning to remove or minimise allergen cross-contamination

Q74

We have shown some ideas that the FSA is considering around advice and guidance on precautionary allergen labelling. Do you have any additional comments you would like to be noted about this? (100 words maximum)

The challenge is not a lack of information, but clarity, consistency and confidence concerning which information sources should be used and clear training to give all food operators confidence to manage allergen risk compliantly. Risk communication should be better understood at a population level.

Page 42: Theme 4: Standards for Risk Analysis of Allergen Cross-Contamination

Q75

Don't know

Should precautionary allergen labelling be incorporated as part of a Food Safety Management System (FSMS), or considered as a separate process?

Q76

Yes

Should there be a requirement for businesses to make their allergen risk-assessment and management processes available to the public?

Page 43: Theme 4: Standards for Risk Analysis of Allergen Cross-Contamination

Q77 **Yes**

Should information regarding the risk of allergen cross-contamination within supply chains be standardised?

Q78 **No**

Would a new accreditation scheme be a good way to ensure standards for allergen risk analysis?

Page 44: Theme 4: Standards for Risk Analysis of Allergen Cross-Contamination

Q79 **Yes**

Should a standard be set for allergen levels to guide the application of precautionary allergen labelling for prepacked foods?

Q80

We have asked you questions around the standards for risk analysis of allergen cross-contamination. Do you have any additional comments you would like to be noted about this topic? (100 words maximum)

In order to effectively set allergen levels, there needs to be alignment on the correct level which must be endorsed by governments and have appropriate testing methods. This must be supported with effective risk communication. The construction of the questions does not fully allow us to respond effectively.

Page 45: Your Big Ideas

Q81

In 250 words or less, please propose your own suggested approaches on precautionary allergen labelling that have not previously been referred to here. We welcome any other views or alternative approaches.

Risk assessment and risk management of allergens can be effective in curtailing severe food allergy reactions. However, precautionary allergen labelling remains an area of confusion, and is a second tier after effective allergen management. Allergen management and communication could be optimised by reference doses and action levels set by government in collaboration with all stakeholders. PAL needs to be part of Food Information to Consumers legislation, If this is not achievable, it would be helpful for targets agreed on between government and retailers / manufacturers similar to the salt reduction targets. The targets might include a phased reduction in the proliferation of PAL wording variants, adoption of FSA guidance articulated in the above sections of the consultation, and the timescale might be 2-3 years. See Walker, M.J., Gowland, M.H. and Points, J., 2018. Managing food allergens in the UK retail supply chain. Journal of AOAC International, 101(1), pp.45-55.
