Allergens<br>Allergen declaration is a legal requirement. Before completing this section, make sure that you have read pages 62-69.

List the allergens used in your menu items:

## What can go wrong here?

(Hazards)

## What can I

 do about it?(Control/Critical Limits)

## How can I check?

(Monitoring/Verification)

## Purchase, delivery/receipt, collection

Receipt of food/ ingredients containing an allergen that has not been identified on the Menu Items Allergen Check List (pg 66) and, as a result, the allergen not being declared on the information available to your customers.
For example:

- Receiving a different brand of product, where your supplier may have substituted your order due to product availability.
- Receiving the wrong product
- New formulation of an existing brand.

Buy from a reputable supplier and maintain a list of your approved suppliers.

I do this

Arrange with your suppliers that they must make you aware of changes to:

- Your order, where you have been supplied a product substitute

I do this

- The ingredients in the products supplied.


## I do this

Maintain an updated Menu Items Allergen Check List (see pg 66), which identifies all the allergens used in the premises and all the dishes in which those allergens are ingredients (see pg 65 for a list of the 14 allergens).

I do this
Other (specify):

Check that your suppliers are aware of allergens and have an allergen management system in place.

Check that the food delivered is either clearly labelled or that a list of ingredients is supplied and remains with the food at all times.

Check that your suppliers make you aware of products that may not have all the allergens declared, or where products have been contaminated with allergens.

Check the product ingredients against your menu items to make sure that the allergen information provided to your customers is accurate.

Record on the Allergen Controls Review pg 70.

## What can go wrong here?

(Hazards)
Receipt of food/ ingredients contaminated with food allergens that should not be present in the food/ingredients.

## What can I do about it?

(Control/Critical Limits)
Ensure that food containing allergens which present a higher risk of crosscontamination le.g. bags of wheat flour, eggs, and milk) are kept separate from other foods during delivery/ collection.

Other (specify):
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$
$\qquad$

## How can I check?

(Monitoring/Verification)
Check packaging/containers and the condition of food for signs of damage and/or leakage of allergens.

Check that foods/ingredients containing allergens are delivered in such a way as to prevent cross-contamination of other foods with allergens.

Observe staff practices during delivery.

Record on the Allergen
Controls Review (pg 70).

## What if it's not right?

(Corrective Action)
If the allergen has contaminated other food, reject the food it has contaminated.

Review the use of this supplier.

Where rejection is not possible:

- Use in a menu item that already contains this allergen
or
- Update the written allergen declaration, e.g. supplement the menu board or temporarily amend your menu


## Storage

Cross-
contamination of food with an allergen during storage, including transferring food in and out of the storage area.

Separate food allergens that have a higher risk of crosscontamination (e.g. bags of wheat flour, eggs, milk) by:

- Storing in clearly identified areas

I do this

- Storing in suitably enclosed containers

I do this

- Storing in clearly identified containers, e.g. colour-coded boxes

I do this

- Decanting into dedicated containers.

I do this
Other (specify):

Regularly check how food is stored.

Check packaging/containers and condition of food for signs of damage and/or contamination.

Observe staff practices.

Record on the Allergen Controls Review (pg 70).

Where you know that the food has been contaminated with an allergen:

- Use in a menu item that already contains this allergen
or
- Update the written allergen declaration, e.g. supplement the menu board or temporarily amend your menu


## or

- Dispose of the contaminated product.

Better supervision, training, and/or retraining of staff.

## What if it's not right?

(Corrective Action)

## Preparation and handling, including cooking, reheating and cooling

## Contamination of

 food with allergens that may be in other food, e.g. cooking in the same oil, using leftovers in other dishes.Use a separate, clearly identified oil/fryer for cooking dishes containing allergens (e.g. fish, breaded or battered products).
Other (specify): ..........................

When using leftovers
le.g. using mashed potato containing butter/cream to thicken soup):

- Only use in a menu item that already contains the allergen

I do this

- Ensure that the presence of that allergen is declared for that food le.g. on the menu).

I do this

Other (specify): $\qquad$
$\qquad$
$\qquad$

Regularly check that separate oil is being used for cooking food containing allergens.

Observe staff practices.

Where you know that the food has been contaminated with an allergen:

- Use it in a menu item that already contains this allergen
or
- Update the written allergen declaration, e.g. supplement the menu board or temporarily amend your menu
or
- Dispose of the contaminated product.

Better supervision, training, and/or retraining of staff.

Regularly check ingredients used and allergen declarations (e.g. on the menu).

Record on the Allergen Controls Review (pg 70).

Do not serve food that contains an allergen unless the presence of that allergen is declared for that food le.g. on the menu, on a label, in the allergen folder).

Better supervision, training, and/or retraining of staff.


## What can go wrong here?

(Hazards)

What can I do about it?
(Control/Critical Limits)

## How can I check?

(Monitoring/Verification)
What if it's not right?
(Corrective Action)

## Cold serve/hot hold/display/service

## Cross-

contamination of food during display and service with an allergen that should not be present in the food.

- Protect/cover the food where possible.

I do this

- Use separate utensils for the different items of food.

I do this

- Ensure that food items do not fall into other foods, e.g. keep allergenic ingredients such as grated cheese in the front containers when making sandwiches.

I do this

- Do not over-stock containers in order to prevent spillage of ingredients.

I do this

- Protect and/or cover the food from customers, where possible.

I do this

- Provide and clearly identify utensils dedicated to each particular food.

I do this

- Display a sign advising customers to use tongs/ utensils correctly.

I do this

- Alert customers that other utensils may be used by other customers to handle allergenic ingredients, e.g. in a buffet.

I do this
Other (specify):

Observe staff practices.
Check that utensils are used appropriately.

Check cleaning of the display/ service area.

Monitor the service area regularly.

Record on the Allergen Controls Review (pg 70).

Where you know that the food has been contaminated with an allergen:

- Use it in a menu item that already contains this allergen
or
- Update the written allergen declaration, e.g. supplement the menu board or temporarily amend your menu
or
- Dispose of the contaminated product.

Better supervision, training, and/or retraining of staff.
What can go
wrong here?
(Hazards)

## What can I do about it?

(Control/Critical Limits)

## How can I check?

(Monitoring/Verification)

Observe staff practices.
Record on the Allergen Controls Review (pg 70).

## What if it's not right?

(Corrective Action)

Better supervision, training, and/or retraining of staff.

| What can go wrong here? <br> (Hazards) | What can I do about it? <br> (Control/Critical Limits) | How can I check? <br> (Monitoring/Verification) | What if it's not right? <br> (Corrective Action) |
| :---: | :---: | :---: | :---: |
| Contamination of food with allergens that may still be on equipment, materials, cloths, and surfaces due to insufficient cleaning. | - Use clean cleaning equipment, materials and cloths/disposable cloths. <br> - Clean food storage containers before use. <br> - Clean surfaces after preparing foods that contain allergens and before preparing foods that do not contain allergens. <br> - Clean all food areas regularly, and always clean them immediately after any spillage of food containing allergens, e.g. milk, egg or any dust deposits from wheat flour. <br> Other (specify): | Observe staff practices. <br> Check the cleanliness of equipment, materials, cloths and preparation surfaces. <br> Record on the Allergen Controls Review (pg 70). | Better supervision, training, and/or retraining of staff. <br> Review cleaning practices. |

## Advice on How to Declare and Manage Allergens

## Allergen declaration

Your customers need to know if any food products you sell or provide contain any of the 14 EU listed allergens as an ingredient (see page 65 for a list of the 14 allergens).

In order to provide this information, you must identify and record each of the 14 EU listed allergens used in your business. In addition, you should put controls in place to minimise cross-contamination of other foods with these allergens.

Allergic reactions can make people very ill and can sometimes lead to death. If a customer has an allergy and inadvertently eats a food that contains an allergen that is not declared, there can be serious health consequences for that customer.

## How do you identify and record the allergens you use?

1. Look at your menus.
2. Identify all the ingredients of each menu item, including drinks, sauces, gravies, glazes, etc.
3. Identify the allergens in these ingredients: look at labels, product specifications, etc.
4. Record allergens in the Menu Items allergen Check List (section 3, page 66) or another allergen recording tool, e.g. the Food Safety Authority of Ireland's (FSAI's) MenuCal (see www.fsai.ie).

## How must allergens be declared in your catering premises?

Legally, all food allergens used in the food that your food business serves must be declared in writing.
The legislation ${ }^{1}$ sets out how you must declare this information. The allergen information must:

- Be indicated in writing, either at the point of presentation, or sale or supply.
- Use the word 'contains' followed by the specific allergens, e.g. "contains wheat, barley, soya and egg".
- Identify the food items that contain particular allergens, e.g. "spaghetti bolognese - contains milk, celery and wheat".
- Be in legible handwriting, or printed so that it is easy to read.
- Be written at least in English, or written in both Irish and English. It may also be written in other languages as well.
- Be freely and easily located and accessible to the customer before they buy the food, without requiring assistance from staff.


## Options for displaying allergen information in your premises

Examples of ways to display the information include:

- Listing the allergens next to each menu item.
- Providing it in hard copy, e.g. the allergen information is located in one or more obvious locations on the premises.
- Providing it in electronic format, e.g. having a computer screen displaying the allergen information.

The location of allergen information must be clearly signposted le.g. on menus or other written material available on the premises) so that your customers can locate and access it easily without assistance, e.g. "You can find the allergen information folder beside the till."

## Distance selling

Distance selling includes food businesses, e.g. takeaways where food is ordered by phone or electronically and delivered to the consumer. Allergen information must be provided prior to purchase and at the point of delivery. It must be in writing at one of these points, e.g. on the menu or in the form of leaflets/catalogues or other printed material. This information can be specific to the purchased product or it could be general supporting material.

## How can I make sure that I declare allergens correctly in my food business?

In order to do this, you must first know all the allergens present in the ingredients you use. Food you receive at your premises must have the correct allergen declarations, and you must use this information to provide accurate allergen information to your customers.

All food supplied to your food business must declare allergen information either on a label or in accompanying commercial documents, e.g. a product specification document. In order to ensure that you receive this information from your suppliers, you should only buy from reputable suppliers who have allergen management systems in place (i.e. suppliers who have identified and risk assessed their food allergens and put suitable controls in place). Use the supplier list on page 6.

## Common mistakes - do not forget to:

- List all the allergens used in a recipe and make sure that they are all declared in writing for that dish.
- Review the cooking methods that may introduce an allergen as an ingredient (e.g. peanut oil used for frying).
- Provide and update allergen information for specials, seasonal foods, children's menus, early bird menus, afternoon tea menus, at coffee stations and on drinks menus.
- Ensure that allergens are clearly identified on the container when decanting products.
- Declare allergens in sauces, gravies, condiments and garnishes, e.g. wheat flour used to thicken gravy, soya in marinades and sauces, and anchovies, cream, or butter in sauces.
- Declare allergens in egg washes and glazes.
- Declare allergens in hot and cold drinks, such as glasses of wine, draught beer or cider, juices or smoothies, coffees and teas, etc.
- Declare the name of the cereal for cereals containing gluten, e.g. 'wheat' must be declared. 'Gluten' may also be displayed in addition but not instead.
- Declare the name of the individual nut for items containing nuts, e.g. 'almond' must be declared, not simply 'nuts'.
- Check for sulphites in products such as sausages, wine, soft drinks, cordials, peeled potatoes and dried fruit.
- Make sure that your staff know what to do when ingredients or recipes change so that customers are not put at risk.


## Ti.MenuCal

MenuCal is a free allergen tool that can help you provide your customers with written allergen information. It is available at www.fsai.ie.

## Be Food Allergen Aware

Five steps to help you comply with the law on declaring the use of food allergens in non-prepacked food for your customers:

## 1

Declare the use of the 14 food allergens in writing

2
Ensure the
allergen
information is
legible and clear

3
Ensure the
allergen
information is
easily accessible
to your customers


Ensure the
allergen
information
is up-to-date

5
Monitor your
suppliers'
allergen information

## Food allergens that must be declared

## Cereals

Cereals containing gluten, namely: wheat (such as spelt and khorasan wheat), rye, barley, oats or their hybridised strains, and products thereof, except:
a) Wheat based glucose syrups including dextrose
b) Wheat based maltodextrins
c) Glucose syrups based on barley including ethyl alcohol of agricultural origin


## Eggs

Eggs and products thereof.

## Fish

Fish and products thereof, except:
a) Fish gelatine used as a carrier for vitamin or carotenoid preparations
b) Fish gelatine or Isinglass used as fining agent in beer and wine

## Peanuts

Peanuts and products thereof


## Soybeans

Soybeans and products thereof, except
a) Fully refined soybean oil and fat
b) Natural mixed tocopherols (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, natural D-alpha tocopherol succinate from soybean sources
) Vegetable oils derived phytosterols and
phytosterol esters from soybean sources
d) Plant stanol ester produced from vegetable
oil sterols from soybean sources


## Milk

Milk and products thereof (including lactose), except:
a) Whey used for making alcoholic distillates including ethyl alcohol of agricultural origin
b) Lactitol

## Nuts

Nuts, (almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia/Queensland nuts) and products thereof, except for nuts used for making alcoholic distillates including ethyl alcohol of agricultural origin.


## Celery

Celery and products thereof

## Mustard

Mustard and products thereof.

## Sesame seeds

Sesame seeds and products thereof.

## Sulphur dioxide and sulphites

Sulphur dioxide and sulphites at concentrations of more than $10 \mathrm{mg} / \mathrm{kg}$ or $10 \mathrm{mg} /$ litre, expressed as $\mathrm{SO}_{2}$, e.g. found in burgers, sausages and wine.

## Lupin

Lupin and products thereof.

## Molluscs

Molluses and products thereof

Allergen information regarding "Cereals containing gluten" must specify the type of cereal, e.g. wheat, and "Nuts" must specify the type of nut, e.g. cashew.

MENU ITEM | Type menu items |
| :--- |
| below and indicate |
| allergens using a tick |

Cereals* Crustaceans

[^0]Containing gluten (wheat, rye, barley \& oats)
Almonds, hazelnuts, walnuts, cashews, pecan, Brazil nuts, pistachio, macadamia
Means the menu item contains this allergenic ingredient

## Menu Items Allergen Check List <br> Food Safety <br> aUthoorty of retano

## Allergen cross-contamination

The previous section (page 62) examined declaring allergens when they are intentionally used as ingredients in your menu items. However, allergens can also enter your food as a result of cross-contamination. You must put in place controls to minimise the risk of cross-contamination of other food with any of the 14 EU-listed allergens.

Cross-contamination with allergens can occur at any point throughout your business, e.g. deliveries, storage, preparation, cooking, cooling, reheating, display and service. Allergens may be unintentionally added to food as a result of practices such as the use of incorrect recipes, last-minute changes of ingredients, cross-contamination due to poor equipment design, use of contaminated equipment, poor cleaning standards, poor storage, poor staff practices or insufficient staff training.

The allergen controls and corrective actions that can be taken to minimise the risk of cross-contamination with allergens are listed on page 55. The key areas for caterers to focus on are:

- Suppliers/raw ingredients
- Storage
- Preparation and handling (including zoning, scheduling tasks and ingredient use, and equipment design)
- Use of leftovers
- Packaging and labelling
- Cleaning
- Staff practices and training.

With dry ingredients such as wheat flour, it can be difficult to contain the dust generated, and this can present a particular risk of cross-contamination during handling, storage and delivery. Special care should be taken with these types of ingredients.

Consider the methods of cooking when deciding on your menu items and whether there are alternative methods of cooking which pose less of a risk of allergen cross-contamination.

Certain methods of cooking - for example, deep frying - present challenges for allergen management and can only be fully controlled with the use of separate oil or a separate fryer for cooking each separate allergen (e.g. fish, breaded or battered products), or through appropriate cooking schedules whereby non-allergenic foods are cooked first. See the 'Using voluntary precautionary allergen declarations' section on page 68.

## Staff practices and training

Allergic reactions can make people very ill and can sometimes lead to death. In order to prevent any customers with allergies from unknowingly eating foods they are allergic to, your staff must be aware of:

- The list of 14 food allergens that must be declared according to EU food law
- The ingredients containing the 14 food allergens and the menu items they are used in
- The need to declare accurate food allergen information in writing
- The health risks associated with food allergens
- The potential for cross-contamination with allergens they handle
- Being a potential source of allergen contamination and the need to maintain good work practices, both after handling foods containing food allergens and when returning to work from food breaks
- The risk of bringing their own food or drink into areas where foods are stored, handled or prepared

Allergen training should be an integral part of all staff training programmes.

## Some key allergen tips

- Pizza ovens carry the potential for cross-contamination. If, for example, you are offering allergenfree options on your menu, you must put controls in place to prevent cross-contamination, e.g. use separate/different coloured trays for allergen-free and allergen-containing options.
- For toast/toasted sandwiches, provide a designated toaster/sandwich maker that is only used for gluten-free ${ }^{1}$ bread.
- For fried foods, use separate oil or a separate fryer, for food not containing allergens so that these foods are not contaminated with an allergen.
- Do not make a food unsafe for your customers by adding other items or side orders; for example, adding a wafer (made with wheat) to a gluten-free ice cream dish, or serving chips cooked in the same oil as battered products (made with cereals containing gluten) with a gluten-free curry.
- Store dedicated equipment for use when cooking allergen-free foods in a lidded box. Make sure this equipment is clearly identified, e.g. by using colour coding or labelling.


## 'Allergen free' indications

If you choose to advertise a product as being free from any allergens, then you need to put in place controls to ensure that this 'allergen-free' status is maintained until the product reaches the consumer. Using these statements means that the allergen is not detectable (except for 'gluten free' declarations²) and that you must be sure that the product is free from cross-contamination. Consider whether you have sufficient controls in place to prevent cross-contamination. With dry ingredients, such as wheat flour, it can be difficult to contain the dust generated, and this can present a particular risk of cross-contamination during handling, storage and delivery. Special care should be taken with these types of ingredients.

Only the terms 'gluten free' and 'very low gluten' may be used to voluntarily indicate the absence or low-level presence of gluten in a food. The term 'gluten free' can only be used if there is no more than $20 \mathrm{mg} / \mathrm{kg}$ of gluten in the final product, while 'very low gluten' can only be used if the gluten content is no higher than $100 \mathrm{mg} / \mathrm{kg}$. Further details are available on the FSAI website (www.fsai.ie/faq/gluten_free_declarations.html).

## Using voluntary precautionary allergen declarations

As part of your food safety management system, you must control the use of allergens in your food business. However, where you have established that the risk cannot be effectively controlled, then you need to consider a precautionary allergen declaration so that your customers are informed of the risk involved in consuming the food.

[^1]Examples of situations where this may arise include:

- If you cannot use separate oil or a separate fryer for foods containing allergens
- At a sandwich bar, where many allergenic ingredients are handled and stored close together
- In cook-to-order, where allergenic ingredients needed to make the dishes may be stored in containers close together
- In a self-service area, where it is difficult to monitor or control customer practices.

Precautionary declarations must not confuse or mislead your customers.

These statements are voluntary and are not a substitute for mandatory allergen declarations and effective cross-contamination controls. They should only be used where there is a demonstrable risk that a product may inadvertently contain one or more allergens.

## Passing on precautionary declarations from supplier to consumer

You should ask your suppliers if their precautionary declarations are based on a risk assessment, and then decide whether these declarations should be passed on to your customers.

To help you monitor that the allergen requirements are being implemented in your business, use the Allergen Controls Review (page 70) on a regular basis.

People can be allergic to, or intolerant of, many different foods or food ingredients. However, Regulation (EU) No $1169 / 2011^{2}$ stipulates that only the use of 14 specific food allergens in the production or preparation of foods (including beverages) must be declared. The presence of other ingredients outside of the 14 regulated allergens may also be declared voluntarily.
${ }^{2}$ Regulation (EU) No 1169/2011 on the provision of food information to consumers.

## Allergen Controls Review

Checks of allergen controls which should be carried out by the Manager or Supervisor regularly*

* tick frequency checks carried out:

| Weekly Fortnightly Monthly |  |  |  |
| :---: | :---: | :---: | :---: |
|  | Satisfactory |  | Details Of Action Taken |
| Staff training |  |  |  |
| Are all staff trained on the allergen declaration requirements? |  |  |  |
| Are all staff trained in carrying out the allergen controls in place? |  |  |  |
| Are staff handling food as little as possible? |  |  |  |
| Are staff following good work practices when handling allergens? |  |  |  |
| Are staff washing their hands and changing their protective clothing so as to prevent cross-contamination? |  |  |  |
| Has allergen training been recorded in SC6-hygiene training records? |  |  |  |
| Allergen declaration |  |  |  |
| Is allergen information provided for all items on the menu, including drinks? |  |  |  |
| Does the allergen information include all the allergens contained in the dish? |  |  |  |
| For cereals is the name of the cereal declared? |  |  |  |
| For nuts is the name of the individual nut declared? |  |  |  |
| Suppliers and deliveries |  |  |  |
| Are all suppliers on the suppliers list? |  |  |  |
| Are deliveries the same as the specification ordered? |  |  |  |
| Are all allergens declared on food deliveries? |  |  |  |
| Are the product ingredients checked against the Menu Items Allergen Check List? |  |  |  |
| Are deliveries checked to make sure packaging is intact and contamination has not occurred? |  |  |  |
| Is food delivered in such a way as to prevent cross-contamination of other foods? |  |  |  |
| Storage |  |  |  |
| Are allergens stored correctly to prevent cross-contamination? |  |  |  |
| Is allergen labelling information retained with each product? |  |  |  |
| Where food is decanted into smaller containers, are they in closed containers and is the labelling information kept with the product? |  |  |  |


| Satisfactory <br> Yes |
| :--- | :--- | :--- | :--- | :--- |
| Noparation Taken |


[^0]:    For more information on how your food business can comply with these
    legal requirements, please visit www.fsai.ie/allergens or contact us at info@fsai.ie

[^1]:    ${ }^{1}$ Commission Implementing Regulation (EU) No 828/2014 on the requirements for the provision of information to consumers on the absence or reduced presence of gluten in food stipulates that 'gluten free' means foods that contain $20 \mathrm{mg} / \mathrm{kg}$ of gluten or less. Only such foods can be labelled as 'gluten free'.

