

Segment Nine - Allergens

AIMS OF THIS SEGMENT

At the end of this segment you will be able to:

- Describe briefly what is meant by a food allergen.
- List the 14 UK-recognised food allergens.
- Describe briefly the legal basis for allergen management, including allergen labelling.
- Understand the benefits of effective allergen management and labelling
- Identify the role of the individual and team in contributing to allergen safety in a food establishment.
- Give examples of allergen controls and good practices.

ALLERGENS – WHAT ARE THEY?

It could be said that we are in the allergens business. Fish, crustaceans (crabs and lobsters) etc and molluscs (mussels, oysters, squid etc) are all recognised allergens.

But that's just three of the 14 allergens recognised in the UK. What do the other 11 have in common with the raw materials and species that make up the seafood industry?

A food allergen is something that causes or triggers a food allergy. A food allergen is usually a protein that the body's immune system reacts to, thinking it is a threat. It's not just any old reaction either, the reaction is usually abnormally vigorous, needing very little exposure to the allergen to cause a significant problem for the person affected.

Not everyone or even most people will be affected by the allergen, but for those few people who are affected the impact can be catastrophic.

A mild reaction can produce itching, hives, swelling of the lips etc. On their own these can be unpleasant enough. But a more severe reaction can literally be life-threatening, resulting in possibly fatal shock and respiratory failure. This severe reaction is usually called Anaphylaxis, (pronounced anna-fill-axis)

BUT WHAT ARE THE 14 ALLERGENS?

The 14 allergens are:

- Celery (found in some brands of tomato sauce),
- cereals containing gluten (such as wheat, rye, barley, and oats),
- eggs,
- fish,
- molluscs (such as mussels and oysters),
- crustaceans (such as prawns, crabs and lobsters),
- lupin,
- milk,
- mustard,
- peanuts,
- sesame,
- soybeans,
- sulphur dioxide and sulphites (above 10 parts per million),
- tree nuts (such as almonds, hazelnuts, walnuts, Brazil nuts, cashews, pecans, pistachios and macadamia nuts).

Two cases that we are aware of illustrate how careful we all need to be:

Case 1: A consumer who was allergic to crustaceans but not fish suffered when they ate a Gurnard. Either during filleting or perhaps naturally through digestion, the flesh of the Gurnard became contaminated with proteins from the crustaceans that made up its natural diet. Their allergic reaction was fortunately mild.

Case 2: A production line changed over from labelling a food dish containing an allergen to one that didn't. Standard procedure was to clean down the labelling equipment between the changes, but for some reason this wasn't correctly followed.

A small number of allergen free pack labels were contaminated and this was enough to affect one unfortunate customer.



There are processes and procedures that enable seafood businesses to continue to provide seafood safe from other known allergens.

We will lightly touch on these later in this chapter.

Anyone who has need of more in-depth training on this may wish to undertake Seafish's Food Allergens Management training course.

This Food Standards Agency [short video](#) introduces allergens very well.

THE LAWS AND REGULATIONS THAT APPLY TO ALLERGENS?

The risk to the reputation of a business is an important reason for getting this right. On top of that there are some powerful Laws and Regulations that can seriously impact on your business if you fail to keep your customers safe and properly informed about allergens.

So what are these Laws?



Reputation and the Law are important, but of greatest importance is this simple fact:

Without prompt and appropriate medical intervention, someone suffering an allergic reaction to something you have produced and/or sold to them could result in their death.

There are five key Laws and Regulations that apply. Four are of a more general nature, but the last one is most specific.

- Food Safety Act 1990
- General Food Regulations 2004
- Food Information Regulations 2014
- Food Information for Consumers 2014
- Natasha's Law – Food Pre-Packed for Direct Sale (PPDS)

Let's look briefly at "Natasha's Law"

Natasha's full name is Natasha Ednan-Laperouse. Natasha died in 2016 from an allergic reaction to sesame seeds in a baguette.

Her case resulted in the PPDS labelling rules that apply when selling pre-packed food that's offered for sale from the same premises. These rules require these steps to be followed. The packaging must include:

- The name of the food.
- A FULL ingredients list.
- Any of the 14 allergens that are included must be highlighted on the ingredients list on the individual pack.

- The text must be clearly legible, the font above a minimum size.

This applies to all pre-packaged items, even to a bread roll packed into a plain paper bag and sealed ready for a customer to buy at a later time.

If that roll is purchased by the customer and their server puts it into a bag for them to take away then this does not apply.

UNDERSTAND THE BENEFITS OF EFFECTIVE ALLERGEN MANAGEMENT AND LABELLING

What is effective allergen labelling?

Allergens that are ingredients in a product must be clearly identified in the labels as an ingredient.

Allergens that may have come into contact with the product or the product packaging can also be notified to the consumer by means of a precautionary statement such as “may contain nuts”.

Overuse and misuse of “may contain” suggests that allergens in your business are not well controlled or are even out of control.

How do you avoid this situation?

Effective Allergens Management

One approach to effectively managing allergens is to treat them as another hazard to food safety and to apply HACCP principles.

In Segment eight we looked at HACCP in some detail. Seafish also offers an Elementary HACCP eLearning programme that you can take after completing this programme.

To summarise the HACCP approach to managing allergens:

- Add allergens to the hazards in your HACCP plan.
- Develop, adapt and use prerequisites and policies to manage these hazards.
- If necessary put in place a suitable critical control point if the prerequisites are insufficient to remove or manage the risk.

In addition to a HACCP or food safety management plan, your business may need to adopt a separate allergen control plan if the level of risk is sufficient in your view.

If your business processes or manufactures seafood products then it may benefit from the Seafish (remotely) taught course in Food Allergens Management.

The benefits of effective labelling and effective management

To put this simply, doing it right means that you as an individual and your company/employer are less likely to:

- Kill someone.
- Make someone seriously ill.
- Be prosecuted, fined and imprisoned.
- Lose customers and other clients.
- Have insurance premiums increased or insurers refuse to cover you.

THE ROLE OF THE INDIVIDUAL AND TEAM

Food regulations state that individuals should be trained in allergens appropriate to their roles and responsibilities.

This module is fine for a general food handler provided they get additional guidance from their employer.

Someone in a supervisory role would need additional training such as the REHIS Elementary HACCP eLearning programme.

Someone in a technical or management role would also benefit from attending our Food Allergens Management training course as well as food safety and/or HACCP training programmes at a higher level.

As an individual your role is to follow the procedures and processes set out by your employer, and to bring to light any deviations or concerns you have as soon as they happen.

For example, your role is to make up the tomato sauce for a ready to eat meal/dish. You run out of tomato puree and a new supply is brought in at short notice. It's a different brand, and it's not listed on your production raw materials paperwork.

Is it safe? Does it have any allergens? Is it approved by “allergen control”?

Not all tomato purees are the same. Some may contain celery, a recognised allergen. Your role in this case is to ask the right question of the right person to make sure someone in the team has not made a mistake.

In these circumstances it is unsafe to rely on someone else to make sure everything works as it should. It is better that everyone is observant, asks questions and takes individual responsibility to ensure that no-one makes a mistake.

Don't misunderstand. Good teamwork is essential in this as it is in every aspect of running a seafood business, but allergens are too dangerous to rely on the team alone.

We all need to take a personal interest in ensuring allergens do not contaminate our products, and all the allergens that are meant to be in that prawn cocktail are properly labelled and notified to the customer.

ALLERGEN CONTROLS AND GOOD PRACTICES

These are not definitive lists for food businesses. To find out more about how to run allergens control in food manufacturing, retail or hospitality managers should attend our Food Allergens Management training programme.

For hospitality and retail

- If you cannot guarantee 100% free from then do not make that statement.
- But, do not rely on “may contain” statements as a generic protection as it can undermine the value of the warning labels.
- Train and educate all staff.
- Provide clear information to customers via menus and packaging and ask that all important question “do you have any allergens or need any allergy information”?
- Separate preparation and storage to avoid cross contamination.
- Be aware of your ingredient’s contents, check your suppliers and be aware supplied ingredients may change so be aware of every constituent of your ingredients.
- Carry out regular checks and audits.
- Have a plan if things go wrong:
 - If a customer goes into anaphylactic shock – what will you do in those first 45 seconds?
 - If you spot an allergen contamination in your storage space, what are your next steps?



For processing and manufacturing

- Limit the use of allergens when developing a new product.
- Try not to reformulate the product as this is an opportunity to introduce another allergen
- Ensure the design of equipment makes easy cleaning possible.
- Make sure you know exactly what goes into your products – this requires full disclosure and cooperation from suppliers.

- Labelling is critical. Is it:
 - Clearly legible and accurate?
 - Reviewed and revised whenever ingredients change, even if the change is temporary?
 - Do not use “may contain” statements as a substitute for poor allergen controls.
- Allow production to support food safety.
 - Longer production runs minimises changeovers.
 - Schedule runs to minimise cross contamination risks.
 - Allow time for effective cleaning between production runs.
- Employ effective cleaning systems
 - Trained staff
 - Allow sufficient time.
 - Test contact surfaces.
- Train and retrain staff.



SUMMARY

Allergens do not affect everyone, but they can be fatal to those who are affected.

There are currently 14 recognised allergens in the UK. Do you remember them?

Information is key. Knowing what allergens are in the food you produce, and sell is essential. Knowing what allergens are in the food you consume is equally vital. Clear communication (including labelling) is the Law.

Controls that are consistently applied, and periodically reviewed are essential.

