



How To Prepare for Inspections / Audits

Guide for Food Businesses

The UK Food Information Amendment, also known as 'Natasha's Law', is being introduced to protect allergy sufferers and give them confidence in the food they buy.

Natasha's Law states that for all prepacked foods, the name of the food and a full list of ingredients must be displayed on the packaging with allergenic ingredients emphasised. For example, this can be done in bold, italics or a different colour. These changes will apply to businesses in England, Wales and Northern Ireland from October 2021 and are also expected to come into force in Scotland in the near future.

This means that food business operators must:

- Provide allergen information to the consumer for both pre-packed and non-prepacked food and drink.
- Handle and manage food allergens effectively in food preparation.

Understanding Natasha's Law

Which Allergens Must Be Declared By Law?

Consumers may be allergic to, or have intolerance to, a number of other ingredients but only the 14 allergens listed are required to be declared as allergens by food law.

THE 14 ALLERGENS ARE:

- Celery
- Cereals containing gluten (such as barley and oats)
- Crustaceans (such as prawns, crabs and lobsters)
- 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 & macadamia nuts)
- Molluscs (such as mussels and oysters)
- Eggs
- Fish
- Lupin
- Milk
- Mustard
- Peanuts
- Sesame
- Soybeans



WHEAT



EGGS



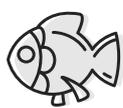
CRUSTACEANS



SESAME



SULPHITES



FISH



SOYA



CELERY



MUSTARD



NUTS



MOLLUSCS



PEANUTS



MILK



LUPIN

Understanding Natasha's Law

Deciphering Prepacked From Non-prepacked Food

PREPACKED

Prepacked products refers to any food put into packaging before being placed on sale. Food is prepacked when:

- It is either fully or partly enclosed by the packaging.
- It cannot be altered without opening or changing the packaging.
- It is ready for sale.

For **non-prepacked foods**, you must supply allergen information for every item that contains any of the 14 allergens.

NON-PREPACKED

Non-prepacked (loose) foods include:

- Foods sold loose in retail outlets.
- Foods which are not sold prepacked.

PREPACKED FOR DIRECT SALE (PPDS)

Prepacked for direct sale products (PPDS) are foods that have been packed on the same premises from which they are being sold.

Currently, allergen information can be provided in the same way as for non-prepacked (loose) foods. From October 2021, the way food businesses must provide allergen labelling information for PPDS will change. Foods will need to have a label with a full ingredients list with allergenic ingredients emphasised within it.

Getting Your Business Audit-Ready

Make Sure You Know What is Contained in the Food You Provide.

- It is recommended to start working with your suppliers straight away to make sure they understand what ingredient and allergen information they are required to provide you under law.
- Ensure allergen information is recorded on product specification sheets.
- Ingredients should be kept in original or labelled containers.
- Allergen ingredients information should be included in recipes or explanations of the dishes provided – you need to consider the impact when recipes change.
- Use of software, such as those provided by Nutritics, means that suppliers can input the ingredients. After which point, any changes to the recipe are automatically captured and flagged to you.

Food Allergy Safety Points

- Keep a record of the ingredient information of any ready-made food and drink you use to cook or serve. Use a software solution like Nutritics to remove the risk of human error by automating the ingredient inputting process and flagging of allergens.
- If your menu changes, make sure you change the list of ingredients with allergens for that food or drink.
- Ingredient containers need to be labelled clearly so you know what allergens are in them.
- Check deliveries to make sure you have the correct order and labelling information is provided.
- Give detailed information in the name or description of dishes on the menu, especially if they include the foods listed over the page.
- When you have been asked to prepare a dish that does not contain a certain food, make sure work surfaces and equipment have been thoroughly cleaned first and that hands are washed thoroughly before preparing the dish.
- If someone asks if a dish contains a certain food, check all the ingredients in the dish (and what they contain). You should also check the ingredients included in products used to cook the dish, thicken sauces or in making garnish or salad dressing. Never guess. If someone has a severe allergy, they can react to even the smallest traces of that ingredient.

Avoiding Allergen Cross-contamination

There are a number of actions the FSA recommends to prevent cross-contamination with allergens:

- Clean utensils before each usage, especially if they were used to prepare meals containing allergens.
- Wash hands thoroughly between preparing dishes with and without certain allergens.
- Store ingredients and prepared foods separately in closed and labelled containers.
- Keep ingredients that contain allergens separate from other ingredients.
- Allergen cross-contamination can also happen through using the same cooking oil. For example, to cook gluten-free chips, you can't use the same oil which has been previously used for cooking battered fish.

Avoid Enforcement and Penalties

Apart from the possibility of making a customer seriously ill, you could also face the risk of financial and reputational damage to your food business if you fail to comply with allergen information requirements.

Local authorities enforce allergen information regulations through regular inspections. Failure to comply can result in action from the local authority.

Food Inspections or Audit

WHAT DOES AN INSPECTION LOOK LIKE?

- An unannounced visit and inspection from your local authority where they examine the safety of your location
- Your establishment will then be assigned a food hygiene rating reflective of the food hygiene standards found on the date of the inspection.
- Occurs at 12-24 month intervals.
- Inspections will include adherence to Natasha's Law within assessment of the food safety management system.

TIPS TO PREPARE FOR AN INSPECTION

- The only way to prepare is by maintaining best practices at all times, including labelling practices.
- Outside help is available from local food service consultancy services.
- Ensure all staff are fully aware of Natasha's Law, whether they are involved in ordering ingredients, managing software, producing PPDS food or selling to consumers.
- Define exact roles and responsibilities.
 - Appoint an allergen champion who can provide more detailed information to consumers and train staff for allergen management.

The UK Food Labelling Resource Initiative

SUPPORTED BY



The UK Food Labelling Resource aims to support the effective roll-out of new food labelling legislation in the UK. This group represents stakeholders from across food industry, academia and government, brought together by Nutritics, a food information and allergen management software company. The new amendment is coming into effect in England, Wales and Northern Ireland from October 2021.

The goal of the UK Food Labelling Resource is to help UK food businesses of all sizes to prepare and adapt to the changes brought about by the UK Food Information Amendment (Natasha's Law). The initiative was set up to aid businesses by first raising awareness of the Food Information Amendment 2019 and then providing them with access to support, frequently asked questions, advice, training, workshops, and resources related to new allergen labelling rules.



For more information, visit natashas-law.com

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About

The UK Food Labelling Resource is a non-profit information group set up by Nutritics, a global provider of allergen management and nutrition labelling solutions and other experts in food, nutrition and allergen research and labelling from Manchester Metropolitan University, EuroFIR and Quadram Institute.

Additional Resources

Useful Links and Resources

SFBB Safe Methods

<https://www.food.gov.uk/sites/default/files/media/document/food-allergies.pdf>

<https://www.food.gov.uk/sites/default/files/media/document/managing-food-allergen-information.pdf>

PPDS (Pre-Packed food for Direct Sale)

<https://www.food.gov.uk/safety-hygiene/food-allergy-and-intolerance>

FSA Allergen Guidance

<https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses>

Chef Recipe cards

<https://www.food.gov.uk/sites/default/files/media/document/recipe-sheet.pdf>

Allergen Matrix

<https://www.food.gov.uk/sites/default/files/media/document/allergen-chart.pdf>

Allergen Signage

<https://www.food.gov.uk/sites/default/files/media/document/allergen-signage.pdf>

Business Companion

<https://www.businesscompanion.info/>