



P4P Compliance Management Limited

Simplifying Compliance

Food and Beverages Allergen Regulations Guide



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Introduction

Regulatory Business Compliance is essential for safeguarding consumers, businesses, and the broader economy.

Failing to comply with regulatory laws and rules, not only risks harming your business reputation and brand, but exposes your organisation to hefty fines, the possibility of bankruptcy, or even a prison sentence for non-compliance.

Food and beverages (drinks) allergies are major conditions affecting millions of people worldwide.

A staggering 2.4 million people that's **1 in 4 people** in the UK have a clinically confirmed food allergy, including approximately:

- 7% of children and 2% of adults with Asthma are affected by food that triggers an Asthma attack.
- 600,000 people living with Celiac Disease, a condition that requires a Gluten-free diet.

The number of people in the UK with food and drink allergies has more than doubled since 2008, with the biggest increase in young children.

Food businesses, such as cafés, restaurants, and caterers that sell food to customers, must be transparent and provide visible information on allergens contained in the food and drinks they sell.

They must also follow the rules for labelling food as set out in UK food laws.

This means that food businesses must:

1. Give customers information about allergens in pre-packaged and non-packaged food and drinks.
2. Handle and manage food allergens effectively in food preparation.

This guide aims to provide an understanding of the regulatory laws affecting food and beverages businesses.

It outlines the best strategies to help your business adapt and thrive with UK regulatory legal requirements.

What are Food Allergies?



Food allergies happen when your body's immune system (defence system) protection against germs that stops you from getting sick, mistakenly treats proteins found in food as a threat.

When this happens, the body releases certain chemicals that result in the symptoms of an allergic response.

Many different foods can trigger an allergic reaction, some are more common offenders.

The reason why some people develop food allergies and other do not is still a mystery.

UK Food Laws

[The General Food Law](#)

This legislation covers the following areas:

1. Food imports and exports
2. Safety
3. Traceability
4. Labelling
5. Product withdrawals and recalls

The purpose for this regulation is to protect people's health and the interests of consumers when it comes to food.

It applies to all steps of making, processing, and selling food and animal feed, with a few exceptions.

[Food Safety Act 1990](#)

The purpose of this legislation is to provide the legal framework for all food-related laws in England, Wales, and Scotland.

The main responsibilities for all food businesses under this Act are:

1. Ensuring that they do not add, remove, or alter any food in a way that could harm people's health
2. Ensuring that the food they serve, or sell is the type, content, and quality that customers expect
3. Ensuring that the food is labelled, advertised, and presented in a way that is not false or misleading

[Food Information Regulation](#)

The UK Food Information Regulations 2014 came into effect on 14th July 2014.

These regulations allow local authorities to enforce the EU Regulation (Regulation 1169/2011) on food information provided to consumers.

This legislation means that food businesses must:

1. Provide information about allergens if the food has any of the 14 allergens
2. Tell customers if the food has any of the 14 allergens
3. Provide information if the food contains any of the 14 allergens
4. List the 14 allergens that may be in the food

Natasha's Law



15 year-old Natasha Ednan-Laperouse ate an artichoke, olive, and a spread made from finely chopped olives, capers, and anchovies baguette sandwich, from an airport food shop, before boarding a flight at a UK Airport in 2016.

The baguette made on the premises was not required by UK law to display allergen advice on its labeling in 2016, and during the flight, Natasha started to feel ill from eating the sandwich.

Despite her father administering two EpiPen injections, a life-saving medication used when someone is experiencing a severe allergic reaction, Natasha suffered a heart attack and sadly died from an allergic reaction to the baguette.

At Natasha's inquest, it was revealed she died because of inadequate food labelling and that there had been a number of previous serious allergic incidents at that food store, before her death.

Natasha's parents successfully campaigned to introduce Natasha's Law, that came into effect October 2021.

Natasha's Law requires all UK food businesses to label all full ingredient and allergens on all food made on premises and on pre-packed for direct sale.

Natasha's Law aims to:

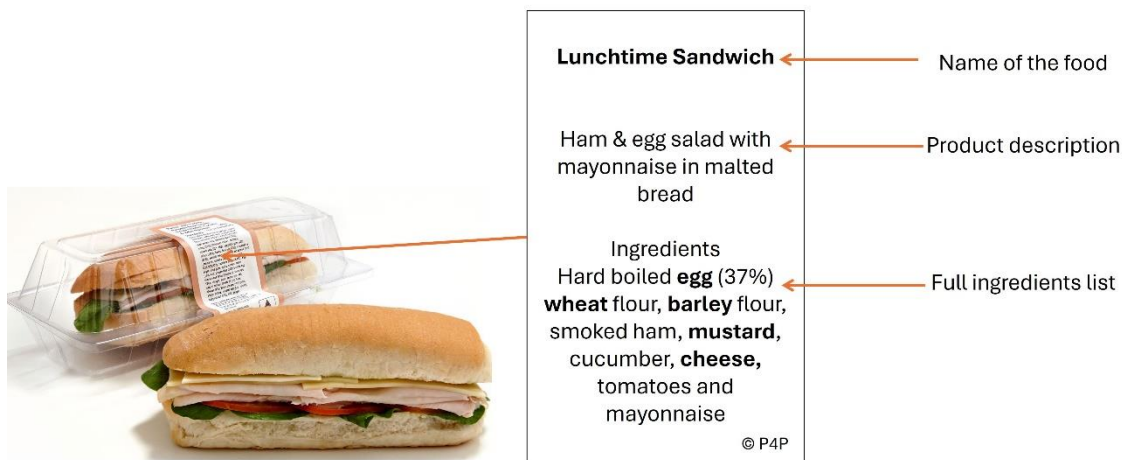
- Protect food allergy sufferers by increasing transparency in the food industry
- Better protect businesses by ensuring accurate labelling and disclosure of allergens in prepacked food items.

Under Natasha's Law food businesses are responsible for:

1. Providing Accurate Information
 - They must provide accurate food labels
 - They must update the labels if the recipe or ingredients change
2. Communication with Suppliers
 - They need to communicate well with their suppliers
 - Suppliers have a legal duty to provide the full and exact list of ingredients
3. Allergen Awareness Training
 - They must ensure their staff are trained on allergen awareness.
 - They must have a proper system in place for managing allergens
 - They must have an understanding Natasha's Law

Allergen Labelling

Natasha's Law Labelling Requirements



Natasha's Law was triggered by a prepacked baguette which at the time, was not required by law to have allergen labelling.

This legislation requires food businesses to communicate allergen information to customers for different types of food.

1. Prepacked Food

- Any food that has been put into bottles, cans, cartons, or wrapped up before it is served or received.
- Prepackaged food must have a list of the ingredients in the food on the packaging. Any allergens in the food must be clearly shown in the list of ingredients.

2. Prepacked for Direct Sale (PPDS) Foods

- Any food that's packaged before customers order or select them. This include items that customers choose themselves, such as from a display unit.
- They can also include items stored behind a counter and some meals sold at mobile or temporary locations.

3. Labelling Requirements

- Sandwiches, salads, and pies made and sold on-site are examples of common items in this category.
- Under Natasha's Law, PPDS food, not just pre-packaged foods, must clearly show the following information on the packaging:
 - The name of the food
 - The full list of ingredients, with allergenic ingredients highlighted (for example, in bold, italics, or a different colour).

Natasha's Law is a regulation that helps keep food safe for customers with food allergies or intolerances.





By following this law, and providing full allergen information on the menu, a chalkboard, or in an information pack provides safe meals to these customers, while helping your business grow.







14 Allergens You Must Declare





Food businesses in the UK, by law “**Natasha’s Law**”, must tell customers if they use any of the 14 regulated allergens as ingredients in the food and drinks they provide.

It’s no longer just a tick in the box exercise, by displaying “Let us know if you have specific dietary requirements” on posters, promotional materials or on your website.

It’s about understanding the severity of allergies and ensuring clear, precise communication at all levels.

1.	Celery This includes celery stalks, leaves, seeds and the root (celeriac). Celery can be found in celery salt, salads, some meat products such as stews, casseroles, soups and stock cubes.	
2.	Cereals Containing Gluten This includes barley, oats, rye and wheat. They can be found in foods containing flour, such as baking powder, batter, breadcrumbs, breads, cakes, couscous, meat products, pasta, pastry, sauces, soups and fried foods which are dusted with flour.	
3.	Crustaceans Crabs, lobsters, shrimp and prawns. They can also be found in fish paste, Thai and South-East Asian curries and salads.	
4.	Eggs Eggs yolks and or egg white, can often be found in cakes, some meat products, mayonnaise, mousses, pasta, quiche, sauces and pastries or foods brushed or glazed with egg.	

5.	<p>Fish Can be found in some fish sauces, pizzas, relishes, salad dressings, stock cubes and Worcestershire sauce.</p>	
6.	<p>Lupin The Lupin flower and it's seeds can be found in flour, in some types of bread, pastries and pasta.</p>	
7.	<p>Milk A common ingredient in butter, cheese, cream, milk powders and yoghurt. Often found in powdered soups and sauces or in foods glazed with milk.</p>	
8.	<p>Molluscs This includes mussels, edible snails, squid, whelks and oysters or as an ingredient in fish stews and oysters sauces.</p>	
9.	<p>Mustard This includes liquid mustard, mustard powder and mustard seeds. Mustard can be found in breads, curries, marinades, meat products, salad dressings, sauces and soups.</p>	
10.	<p>Tree Nuts These are nuts that grow on trees and include almonds, Brazil nuts, cashews, hazelnuts, pecans, pistachios and macadamia nuts. Nuts are not the same as peanuts (peanuts are a type of bean that grows underground). Tree nuts can be found in breads, cookies, crackers, desserts, and curry dishes. They are also used to make nut powders, nut oils, nut sauces and marzipan (a type of almond paste).</p>	

11.	<p>Peanuts</p> <p>A bean that grows underground, sometimes called a groundnut and often used as an ingredient in biscuits, cakes, curries, desserts, sauces, such as satay sauce. They are also found in groundnut oil and peanut flour.</p>	
12.	<p>Sesame Seeds</p> <p>These seeds can be found in bread, breadsticks, houmous, sesame oil, tahini (a Middle Eastern condiment made from ground sesame) or sprinkled on burger buns. They can often be toasted and used in salads.</p>	
13.	<p>Soyabean (Legume)</p> <p>Includes tofu, bean curd, edamame beans, miso paste, textured soya protein and soya flour. They can be found in desserts, ice cream, meat products, sauces and vegetarian products.</p>	
14.	<p>Sulphur Dioxide (SO₂)</p> <p>A corrosive, acidic gas widely used in the food and drinks industries as a preservative. Often used in dried fruits such as raisins, dried apricots and prunes. They are often found in meat products, soft drinks, vegetables as well as in wine and beer.</p>	

Allergies Illnesses and Diseases

Asthma

A long-term lung disease, that causes swelling in a person's airways. Symptoms include wheezing, coughing, trouble breathing, and chest pain.

The most common foods that can trigger Asthma include:

- Eggs
- Milk
- Peanuts
- Tree Nuts
- Soy
- Wheat
- Fish
- Shellfish
- Food Preservatives (sulphites) such as dried fruits

Celiac Disease

Is a reaction of the immune system to gluten, a protein found in wheat, rye, barley, and other grains.

When someone with Celiac Disease eats gluten, their immune system attacks the small bumps (villi) that line the small intestine that helps the body absorb nutrients. Symptoms can range from mild to severe abdominal pain, bloating, diarrhoea, nausea, vomiting, weight loss and tiredness.

The main treatment for Celiac Disease is to follow a strict gluten-free diet for life.

Eczema (Atopic Dermatitis)

A common skin condition causing dry, itchy and inflamed skin.

The foods most likely to cause eczema flare-ups are milk and egg.

About one-third of children with moderate to severe eczema have diagnosed food allergies.

Food Protein-Induced Enterocolitis Syndrome (FPIES)

A serious type of food allergy affecting infants and often triggered by cow's milk, soy, rice, oats and eggs.

Symptoms include vomiting, diarrhoea, dehydration, tiredness and changes in body temperature.

Lactose Intolerance

Lactose, a sugar present in dairy foods, affects individuals with lactose intolerance, because their body lacks sufficient amounts of the lactase enzyme. This prevents them from properly digesting lactose.

Conclusion

Food businesses in the UK must provide accurate food label information and update labelling information when recipes or ingredients change or are replaced by suppliers.

They must appreciate and train their staff, so they also understand Natasha's Law.

Suppliers have a legal duty to have an allergen management system and provide the full and exact list of ingredients to food businesses.

While keeping up with regulatory changes may be challenging, time consuming and have costs implications, the consequences of not doing so are even greater.

If you do not follow food regulations, you could face big penalties, fines, legal complications, and damage to business reputation.

Food organisations need to watch closely for changes in food and beverages regulations and put strong compliance measures in place to avoid breaking the rules.

P4P Compliance Management Limited, is a trusted partner for businesses operating in regulated industries.

We team up with our clients to create effective compliance plans, processes, procedures and the right tools, to help them, stay up-to-date and meet relevant legal requirements for their specific industry.

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