

# Food Allergy & Intolerance: guidance for the Irish catering industry



Food allergy, food intolerance or coeliac disease affects about one in ten of us. The effects can range from mildly uncomfortable to life threatening. This booklet sets out what people in the catering industry need to know about these conditions and how to serve customers who must avoid certain foods. It will help you to meet your legal obligations to serve safe food.

**Note to managers:**

We recommend that you keep a copy of this booklet in your food safety management file. Please use it as part of your overall staff training in food allergen management.

Disclaimer: This guidance is provided in good faith and outlines the general principles of good food allergen management. **safefood** or the Health Services Executive will not be held responsible for any adverse effects resulting from following the information in this publication. We do not guarantee that following the advice in this publication will prevent an allergic reaction from occurring. Food businesses must comply in full with the law on the manufacture, preparation and sale of safe food. Sole responsibility for the safety of supplied food rests with the owner of the business.

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# Introduction

Food allergies and intolerances are **on the rise** in developed countries.

## For example, peanut allergy –

The most common food allergy to cause fatal or near fatal reactions, has...



...**trebled**  
since 1995



...now affects almost **2%**  
of children starting school

## The rate of food intolerances and allergies –

In Ireland, approximately...



...**3%** of the population  
have a food allergy



...**1%** of adults have  
coeliac disease



...**5%** of adults are  
lactose intolerant

The causes are not clear, though they may be partly genetic as the conditions often run in families and vary from region to region. Coping with food allergies or intolerances in everyday life can be difficult.

EU legislation\* recognises **14 foods** as being responsible for the majority of allergic and intolerant reactions in Europe. In Ireland, the main problem foods are **cereals containing gluten, peanuts, nuts, eggs, milk, crustaceans, sesame and fish.**

If you work in the food industry, particularly in catering, you need to know how you can control food allergens. This can be a matter of life or death.

\*Identifying the 14 allergens: Annex 2 to Regulation No. 1169/2011.



# Definitions

## What is a food allergy?

You have a **food allergy** if your immune system overreacts to a particular protein (an 'allergen') in food. Peanuts, nuts, eggs and milk contain some of the most common allergens. Symptoms of an allergic reaction usually come on quickly and, if severe, may include breathing difficulty, vomiting, swelling and collapse.

## What is a food intolerance?

You may have a **food intolerance** if you find a particular type of food often brings on unpleasant symptoms. These may include an upset stomach, rash, headache or other discomfort. However, they do not involve the immune system and usually take a few hours to appear. Examples include lactose intolerance (when you cannot digest milk properly); migraine brought on by red wine; or gluten intolerance (which is different from coeliac disease – see below).

The term **allergen** is generally used for any foods or food products that causes allergies or intolerances.

## What is coeliac disease?

**Coeliac disease** is triggered by gluten. It is not an allergy or intolerance but an autoimmune disease where your immune system produces antibodies that attack the lining of the gut. This means you cannot absorb food properly, resulting in malnutrition and symptoms that range from pain and diarrhoea to fatigue and nerve damage. You cannot cure coeliac disease but you can stay healthy by keeping to a gluten-free diet. Gluten occurs naturally in cereals such as wheat, barley and rye but can easily contaminate other cereals and other foodstuffs, such as oats, during processing or packaging.



# Food allergy

## How can I tell if someone is having an allergic reaction?

The most common symptoms of an allergic reaction include:

- Coughing
- Dry itchy throat and tongue
- Wheezing and breathlessness
- Runny nose
- Itchy eyes
- Flushing of the skin
- Abdominal pain, nausea and vomiting
- A red or raised rash anywhere on the body
- Swelling, especially of the face, lips, tongue and throat
- Changes in heart rate
- Feeling bloated

In a severe reaction, these symptoms get rapidly worse and can lead to anaphylactic shock. Symptoms of anaphylactic shock (anaphylaxis) include:

- Intense fear
- A rapid fall in blood pressure
- Rapid heartbeat
- Breathlessness from severe asthma
- Collapse and unconsciousness
- Swelling of the throat and mouth.

Anaphylaxis is a medical emergency. Seek urgent medical treatment if the person has difficulty in swallowing or breathing or suddenly feels weak.

## What can I do to help?

If the allergic reaction looks severe or likely to worsen:

1. Dial 999 or 112 to call an emergency ambulance.
2. Before the ambulance arrives, ask the customer if they carry antihistamine or an auto-injector of adrenaline, and if so tell them to use it.
3. If they are not capable of giving themselves the injection, another trained person should give it. If no trained person is immediately available, you must help the customer either by following their instructions or by giving the injection yourself. In an emergency, you would be legally covered to do so.

If you are not sure how severe the attack may be, follow the steps above. It's safer to act than to wait.



# Food intolerance / coeliac disease

## How can I tell if someone has a food intolerance or coeliac disease?

Symptoms of food intolerance or coeliac disease may include:

- Stomach pain, nausea or diarrhoea
- Wind or bloating
- Headache
- Flushing or skin rash
- Wheezing

Symptoms are usually not immediate and tend to be less severe than those associated with an allergic reaction.

## What can I do to help?

Symptoms of food intolerance do not usually need medication. Once a customer knows which foods cause the problem, they can try to avoid them.

As a caterer, you can help a customer with a food allergy or intolerance to choose food that is safe for them by:

- Understanding their needs
- Giving full and clear information on ingredients
- Handling food properly, as outlined in this booklet





# Allergenic foods

## Which foods are associated with food allergy and food intolerance?

These are the **14 foods** listed in EU legislation concerning the provision of information to consumers:

- Celery
- Cereals containing gluten (specifically wheat, rye, barley, oats, spelt, kamut)
- Crustaceans (e.g. prawns, crabs, lobsters)
- Eggs
- Fish
- Lupin
- Milk
- Molluscs (e.g. mussels, oysters)
- Mustard
- Nuts (specifically almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia nuts)
- Peanuts
- Sesame seeds
- Soybeans
- Sulphur dioxide and sulphites

These foods are easy to identify when they are sold separately. However, they may be less obvious as ingredients in a food product or menu item. Under EU legislation, if any of the 14 allergens are used as ingredients in pre-packed food products, they must be highlighted on the product label. This obligation has been extended to non-pre-packed foods such as menu items in a restaurant. In Ireland, this allergen ingredients information must be provided in writing. Here is some guidance on what to look for, and why.

\*S.I. No. 489/2014 - Health (Provision of Food Allergen Information to Consumers in respect of Non-Prepacked Food) Regulations 2014.



## Celery

Includes the stalk (stick), root (celeriac), celery salt and seeds.

### Uses

- Celery sticks – salads and dips
- Celeriac – mashed, roasted or fried
- Celery seeds or salt – in soups, sauces, stocks and drinks

### Notes

In addition to being allergenic, celery can also cause oral allergy syndrome – redness, itching and blistering around the mouth or throat.



## Cereals containing gluten

Specifically wheat, barley, oats, rye, spelt and kamut (or Khorasan).

### Uses

- Bread, biscuits and cakes
- Breakfast cereals
- Pasta
- Pastry
- Pizza
- Foods coated in crumbs or batter before cooking
- As a thickening or binding agent in foods such as soups, confectionery, stock cubes and spice mixes

### Notes

Avoiding cross-contamination can be a challenging requirement for businesses that make or package gluten-free foods alongside gluten-containing foods.

## Action on gluten

If you make or sell gluten-free food, you must:

- **Keep it separate from gluten containing food at all stages** – preparation, storage, packaging, presentation.
- Use clean equipment (e.g. knives, bowls, blenders) or **dedicated equipment for gluten-free foods**.
- Prepare it in an area where it **cannot come into contact with gluten-containing food (eg. flour)**.
- Be aware of what you can and cannot say about the gluten content of the foods you sell\*. Remember **'Gluten Free'** now specifically means that you know the gluten content is not more than 20mg of gluten per kg of food.

For guidelines on how to discuss gluten requirements with customers, see page 19: Communicate with customers.

\*These rules on presenting information about gluten-free foods are set out in Commission Implementing Regulation (EU) No 828/2014, which came into force in July 2016.



## Crustaceans

Crustaceans include crab, lobster, prawn, shrimp, langoustine and crayfish.

### Uses

- Served on their own
- In dishes such as fish pie and seafood chowder
- In soups and stocks

### Notes

People with crustacean allergy are usually sensitive to different kind of crustaceans - lobster, crab, prawn, etc.



## Eggs

Eggs from any birds, including duck, goose, turkey and quail as well as hens, may be allergenic. Most egg allergens are in the egg white (albumen) but some people also react to the yolks.

### Uses

- Egg dishes such as omelettes or quiches
- Baked goods including bread and cakes
- Meat products such as pies, meat loaf and burgers
- Fresh pasta dishes
- Desserts including custards and ice creams
- Glazing or binding pastry
- E322 lecithin – an emulsifier often made from yolk and commonly used in mayonnaise and sauces
- Lysozyme – an antibacterial enzyme found in egg white and widely used in food and pharmaceutical manufacture

### Notes

Egg allergy in children is very common, but many of them grow out of it by the age of three.



## Fish

### Uses

- Sauces (e.g. Worcester sauce), salad dressings (e.g. Caesar salad) and pizza toppings are often flavoured with anchovies
- Soups and stocks
- Pastes
- Stir-fry mixes
- Oriental sauces
- Surimi – minced white fish used as a cheaper substitute for crab and lobster

### Notes

People who are allergic to fish may even react to the smells given off when the fish is being cooked. If they are allergic to one species of fish, they should generally avoid all fish because they share similar allergenic proteins. There is a risk of cross-contamination during harvesting and processing.



## Lupin

### Uses

- Lupin flour – a gluten-free flour used on its own or mixed with other flours in pastry, cake, batter, pasta etc
- Lupin seeds – added to bread

### Notes

Lupin is related to peanut and soybean and contains similar allergens, so people with peanut or soybean allergy should avoid lupin products.



## Milk

Dairy products can cause two main problems: lactose intolerance and milk allergy. **Lactose intolerance** is where your body does not produce enough of the enzyme lactase and so you cannot digest milk sugar (lactose). A **milk allergy** is where your immune system reacts against the proteins (such as casein) in milk.

Milk and cheese are used as ingredients in many types of food. You must ensure that any dairy products listed on food labels or ingredient lists show clearly that they derive from milk.

### Uses

Milk products include:

- Butter, butterfat and ghee
- Buttermilk
- Cream
- Cheese
- Yoghurt
- Ice cream
- Fromage frais

### Notes

Many young children have a cow's milk allergy or milk intolerance, but most grow out of it.



## Molluscs

Molluscs include mussels, scallops, oysters, clams, snails, periwinkles, whelks, squid and octopus.

### Uses

- Served on their own
- Sauces
- In dishes such as fish pie and seafood chowder
- In soups and stocks

### Notes

People with mollusc allergy are usually sensitive to different kind of mollusc - oysters, clams, snails, etc.



## Mustard

Mustard comes in many forms including sprouted seeds, leaves, flowers, powder/flour and oil. All can affect people with a mustard allergy.

### Uses

As a condiment, and in:

- Sauces and marinades
- Curries
- Soups
- Salad dressings
- Coatings on meat or fish products

### Notes

Mustard allergy is comparatively rare in Ireland, but may accompany other allergies.



## Nuts

The nuts listed in the EU regulation are tree nuts: almonds, hazelnuts, walnuts, cashews, pecans, Brazil nuts, pistachios and macadamia nuts.

### Uses

- Breakfast cereals and cereal bars
- Cakes, biscuits, pastries and breads
- Chinese, Thai or Indonesian dishes, including curries
- Chilli, satay and pesto sauce
- Lasagne
- Mixed salads, salad dips and dressings
- Desserts, including ice cream and fruit yoghurts
- Nut spreads
- Vegetarian products, including hydrolysed vegetable protein
- Unrefined cooking oils including walnut and hazelnut oils – often used in Chinese, Thai and Indonesian cooking
- Sausages and stuffing
- Bouillon
- Worcester sauce
- Marzipan
- Praline, nougat and other confectionery

### Notes

Unrefined nut oils such as walnut oil are also unsuitable for people with a nut allergy.



## Peanuts

Other names for peanuts include groundnuts, earth nuts, goobers, goober peas, ground peas, pindas, monkey nuts and Chinese nuts.

### Uses

- Breakfast cereals and cereal bars
- Baked in or on cakes, biscuits, pastries and breads
- Chinese, Thai or Indonesian dishes, including curries
- Chilli, satay and pesto sauce
- Lasagne
- Mixed salads, salad dips and dressings
- Desserts, including ice cream and fruit yoghurts
- Peanut butter and nut spreads
- Vegetarian products, including hydrolysed vegetable protein
- Refined or unrefined peanut oil (often used in Chinese, Thai and Indonesian cooking)
- Arachis oil
- Sausages and stuffing
- Bouillon
- Nougat and other confectionery

### Notes

Peanut allergy is one of the most common and severe food allergies, especially in children, and usually persists throughout life.



## Sesame

seeds, paste or oil

### Uses

- Breads, rolls, cakes and biscuits
- Tahini
- Hummus
- Halvah
- Gomashio seasoning
- Stir-fries

### Notes

Sesame flour can also be used as a gluten-free or low-carb alternative instead of wheat flour.



## Soybeans

Soy (or soya) is a rich source of vegetable protein and widely used in general food processing as well as vegetarian and vegan diets. It can therefore be difficult to avoid for people with soybean allergy.

### Uses

- Soya flour
- Textured vegetable protein (TVP) – a meat substitute also used in some processed meat products
- Tofu (bean curd)
- Lecithin emulsifier (E322)
- Vegetable oil
- Sauces such as soya, tamari and shoyu

### Notes

Soy is quite common in a lot of ethnic, particularly Asian, cuisines.



## Sulphur dioxide and sulphites

Sulphur in small amounts is essential to health, but some people are intolerant or allergic to sulphur dioxide (SO<sub>2</sub>) and sulphites (compounds of sulphur) in food or drink. They are mainly used as preservatives but must be listed as allergenic ingredients where they occur at concentrations of more than 10mg/kg or 10mg/litre. Sulphites include Sodium sulphite, Sodium bisulphite, Potassium bisulphite and Potassium metasulphite (E220-228).

### Uses

- Wine, beer and carbonated soft drinks
- Salads, dried fruits and vegetables that are pre-prepared for cooking, such as raw potato chips
- As a preservative in meat products such as sausages and beef-burgers (if these contain a minimum of 4% vegetable material or cereals, sulphur dioxide or sulphites are allowed up to a final concentration of 450 mg/kg)

### Notes

SO<sub>2</sub> may trigger asthma attacks.

Other symptoms of intolerance or allergy range from skin rash to (rarely) anaphylaxis.



# Caterers' responsibilities

Your basic responsibility is to provide food that is safe to eat. By law, you must have in place a food safety management system based on HACCP (hazard analysis and critical control points) principles to assess risks and control food safety hazards.

Food allergens are also a hazard and should be included in your HACCP-based system and considered and handled in the same systematic way.

## How to manage food allergens

1. Identify allergenic ingredients.
2. Have in place a food allergen management system to avoid cross-contamination (when storing, labelling, preparing and serving).
3. Train all staff.
4. Act with due diligence.
5. Communicate fully, openly and tactfully with customers about their needs.

See below for more details on each of these responsibilities.

## 1. Identifying allergenic ingredients

- Be aware of the 14 allergens on the EU list\* and of where they may be found. Identify them clearly on menus, recipes and storage labels.
- If a customer tells you they need to avoid allergens that are not on the EU list, check recipes and labels to ensure you can avoid, remove or replace these foods for them.
- Keep information on ingredients up to date and accessible, for example on a computer or manual file or on store-room notices. You can then check at a glance whether a foodstuff carries a warning about potential allergens.
- Ask your suppliers to notify you of any changes in ingredients or recipes.

\*Identifying the 14 allergens: Annex 2 to Regulation No. 1169/2011



## 2. Food allergen management system

Allergen management is key to ensuring the safety of customers with food allergies or intolerances. Your system should have the following controls in place:

- Train all staff from day one, with regular refresher courses, to be aware of the importance of food allergen control and your in-house system.
- Keep up-to-date information on the allergen ingredients in your recipes and make this information available in writing to your customers.
- Ask suppliers to notify you of any changes in ingredients.
- Check that items delivered match exactly those that were ordered.
- Store major allergens such as gluten-containing foods, nuts and peanuts separately and in lidded containers. These should be marked or colour coded if possible.
- Alert your staff to cross-contamination risks and how to control them (see the box 'How to avoid cross-contamination' below).
- Prepare and serve non-allergenic food separately from allergenic if asked to do so (see the box 'Preparing allergen-free food' below).
- Train all staff how to properly clean utensils and equipment to avoid cross-contamination.
- Ensure the allergen information for customers on menus or notices is clear and easy to read.
- Encourage customers to consult with your staff so they can make an informed choice about what foods are safe for them to eat.

### How to avoid cross-contamination

Cross-contamination measures should cover the way you store, label, prepare and present food. Be aware of the three main ways in which cross-contamination can occur:

- **Food to food contact** – Food allergens can easily pass from one food to another (e.g. flour dust).
- **Food to equipment contact** – Thoroughly clean all equipment, utensils and worktops before preparing allergen-free food, or use separate equipment.
- **Food to hand contact** – Always wash your hands thoroughly before preparing allergen-free food.
- **Change your work clothes** if these have been contaminated e.g., with flour.

**After preparing an allergen-free meal, keep it covered, keep it labelled and deliver it separately to the customer.**



### 3. Train all staff

- Appoint a responsible member of staff to handle all food allergen and related queries and ensure that all staff know who this is. Nominate a deputy in case that person is absent.
- For your food allergen management system to be effective, all staff should get basic training in food allergen management before they first start work so they are aware that any related requests must be taken seriously.

### 4. Act with due diligence

Food allergy issues can sometimes lead to legal cases. And while every legal case is unique, it's considered best practice to always act with what's called 'due diligence.' This means that if someone tries to sue your business over a food allergy issue, you may by law\* defend yourself if you can prove that you took '**all reasonable precautions and exercised due diligence**' to avoid committing an offence\*. In general, this means:

- Keeping written records of the checks carried out as part of your food safety management system.
- Providing accurate information in writing on allergens for each menu item.
- Demonstrating how you avoid allergen cross-contamination
- Keeping records of staff training sessions on food allergens.

### Note to managers:

You can develop your own food safety management system or follow the guidelines set out in the booklet **Safe Catering – Your Guide to Making Food Safely**, published by the Food Safety Authority of Ireland. The FSAI also has an online tool for caterers with practical information on how to identify and manage allergen information for menus. **MenuCal** was written in partnership with caterers and environmental health officers. The FSAI have also published a Guidance Note (No. 24 on **Gluten-Free and Very Low Gluten Declarations**) that deals with EU legislation governing voluntary information statements provided to consumers about the absence or reduced presence of gluten in food.

### 5. Communicate with customers

- You should **let your customers know** that you would be happy to discuss their requirements with them. You can do this by, for example, noting on the menu or chalkboard that customers should ask staff for further information if they have any concerns about allergens.



- You must **state clearly** if any of the food you serve contains any of the 14 allergens on the EU list. This applies whether or not the food was bought loose or pre-packed. In Ireland, you must provide allergen information in writing, for example by including the allergenic ingredients on the menu.
- Remember that food allergy **is not limited** to the 14 allergens on the EU list. Let customers know they are welcome to discuss any food allergy or intolerance issues with you or your nominated staff member(s).
- **'May contain'** statements – under EU law, it is not compulsory for food manufacturers or caterers to warn customers about the risk of cross-contamination from allergens because the risks are difficult to quantify. However, many manufacturers do issue warnings such as 'may contain nuts' or 'packaged in a factory that also handles cereals containing gluten'. Your customers may want to know if these warnings apply to any food you are preparing for them. You should always tell them of any ingredient with a 'may contain' advisory so they can make an informed decision.
- If asked, **tell your customer** what steps you take to avoid cross-contamination.
- When discussing **gluten**, you should:
  - Provide written information for menu items that have any of the **cereals containing gluten** as ingredients
  - Only use the term 'gluten' if you know the exact amount of gluten in a product.
  - Only use statements such as 'suitable for people intolerant to gluten' or 'suitable for coeliacs' **if you know the amount of gluten** in the product.
  - Follow the guidelines set out in the box 'Action on gluten' on page 9. Be willing to discuss them with customers who may be worried about the risk of cross-contamination. Remember cross contamination of foods with various allergens is a risk during delivery, storage, preparation and service.
- Use **tact and discretion**, as some customers may feel uncomfortable or embarrassed about discussing their dietary needs in public, especially if they have an underlying medical condition.
- Remember: if you are unsure of any of the ingredients, or if there is any doubt about cross-contamination, you must **tell the customer**. The final decision to buy rests with the customer.

\* In the Republic of Ireland, paragraph 5 (3) (a) of European Communities (General Food Law) Regulations 2007 (S.I. No. 747 of 2007) refers to the due diligence defence particularly with respect to the offence of placing unsafe food on the market (in contravention of Article 14 of Regulation (EC) 178/2002).



## Preparing allergen-free food

When a customer requests a meal free of an allergen, follow these guidelines:



Thoroughly clean your worktops and all the equipment used. This includes chopping boards, mixers, bowls, pots, pans, griddles, knives and other utensils.



Use plenty of detergent and hot water.



Ensure staff wash their hands thoroughly with soap and water before they prepare the meal and that they avoid touching other foods until they have finished preparing it.



Do not use equipment which is encrusted with carbonised food residues (such as a wok).



Dismantle equipment as appropriate so you can remove all allergen residues.



Assemble all the ingredients, and check the labelling and recipes to ensure none of them is allergenic.



Don't cook allergen-free food in oil that has already been used to cook other foods.



Be aware of the risks of cross-contamination (see page 17).



Once the allergen free meal is ready, keep it covered and labelled and deliver it separately to the customer.



Make sure all staff are familiar with the following instructions, and put a printed copy where they can see it.

## How to deal with a query from your customer about allergens

If a customer wishes to know if a meal or other food or drink is suitable for them:

- 1. Ask them to clarify:**
  - Which specific ingredient(s) do they need to avoid? These may or may not be on the EU list of 14 allergens.
- 2. Refer the query to the manager or a designated member of staff:**
  - The designated person to deal with allergy-related requests is .....
  - If the designated person is unavailable, please contact: .....
- 3. Look for information about the ingredients:**
  - If the allergen in question is one of the EU listed allergens, then this information should be available in writing.
  - If the allergen in question is not on the EU list, the chef will advise if it is used as an ingredient
  - Ingredients information will be on the packaging or on the documentation delivered with the food.
  - If you use ingredients bought without packaging, show the recipe to the customer.
- 4. If any ingredient contains a 'May contain' statement regarding the possible presence of the allergen, tell the customer as this indicates the potential for cross-contamination.**
- 5. ALWAYS BE TRUTHFUL.** Remember, you can always recommend a safe alternative or even prepare something from scratch to avoid the possibility of allergen cross-contamination.
- 6. The customer decides.** Once you have told the customer about the ingredients and the possibility of cross-contamination, the customer can make the final decision whether or not to buy the food.





For more food allergen and intolerance advice,  
search **safefood**



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 **Helpline - ROI 0818 40 4567 NI 0800 085 1683**

