Food Allergen Policy

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From 13 December 2014, a new piece of European legislation, the Food Information for Consumers Regulation (EU FIC) ensures that allergen information must be provided in a clearer and more consistent way on pre packed and loose food, making it easier for you to make safer choices when buying food.
The 14 Allergens

Crustaceans

The rules do not name any specific species of crustaceans which means all types of crustaceans are included (for example lobster, crab, prawns and langoustines). Labelling of crustaceans and products made from them will need to have a clear reference; for example ‘prawns (crustaceans)’, ‘crayfish (crustaceans)’, ‘lobster (crustaceans)’ shrimp paste (crustaceans).

Eggs

The rules do not name any species of eggs, because ‘eggs’ refers to eggs from all birds, for example from laying hens as well as eggs from ducks, quails, geese, gulls and guinea fowl. Therefore all eggs will need to be declared when used as an ingredient or a processing aid.

Fish

The rules do not name any species of fish because ‘fish’ means all species of fish and fish products. The generic terms provisions allow the generic name ‘fish’ to be used in an ingredient list only where there is no specific reference to a common fish species name on the label, for example fish stock. Labelling of fish ingredients or products will need to have a clear reference food; for example, ‘cod (fish)’, ‘salmon (fish)’, ‘tilapia (fish).

Peanuts

While peanuts may also be commonly referred to as groundnuts (which can be confused with ground/powdered nuts such as almonds or a mix of nuts and peanuts) or monkey nuts, the term ‘peanuts’ should be used for products or ingredients made from them for allergen labelling. Both refined and unrefined peanut oil have to be labelled with reference to peanut.

Soybeans

Terms such as ‘soya’ or ‘soy’ are sufficient to indicate the soybean origin. However less common terms such as tofu or edamame may not be recognized as originating from soya and its clear presence will need to be indicated for soya products or derivatives. e.g. ‘tofu (soya)’ or ‘edamame (soya).

Milk

The rules do not name the animal origin of milk because the word ‘milk’ includes milk from mammals such as cow, sheep, goat, and buffalo etc. It should be noted that all mammalian milk proteins have a similar structure and if someone has an allergy or intolerance to cows’ milk, they are likely to be allergic or intolerant to other mammalian
milk. Therefore all milk and milk products (including lactose) will need to be declared when used as an ingredient or a processing aid.

Milk products such as cheese, butter, fermented milk and cream do not have to have an ingredients list, where no other ingredients have been added other than lactic acid, food enzymes and microbiological cultures and (in the case of cheese) salt. In order to ensure that consumers still receive the information they need to clearly identify the presence of milk in such cases, the following advice may be applied. The use of sales names such as ‘cheese’, ‘butter’, ‘cream’ and ‘yoghurt’ is considered to refer clearly to the milk because legally these products can only be made from mammalian milk (EU Council Regulation No. 1308/2013 on Dairy designations). In such cases, further reference to ‘milk’ is not necessary because the Dairy designations protect such products. Therefore, cheese, butter, cream and yoghurt can be emphasized within the ingredients to demonstrate the presence of a milk product.

However, the information should make a clear reference to milk in the case of less familiar milk products used as ingredients (e.g. fromage frais, Mascarpone, Cantal, and Quark) or products being sold under a name which does not clearly refer to milk. Components derived from milk, such as lactose, casein and whey, should be declared with a clear reference to milk e.g. ‘whey (milk)’.

**Nuts**

The rules list these as: almond, hazelnut, walnut, cashew nut, pecan nut, Brazil nut, pistachio nut, macadamia nut or Queensland nut and products made from these nuts. The type of nut should be listed and emphasized in the ingredients panel. Other types of nuts, and other foods which are not nuts (even though they are called nuts i.e. chestnuts, pine nuts and coconut), are not named in the rules. Chestnuts and pine nuts are also known to cause allergy in some people, but are not required to be listed under these rules. Where ingredients or processing aids derived from nuts have been used, the ingredient should be indicated with a clear reference to the nut; for example ‘flavoring’s (almond).

**Celery**

This term is used generically in EU FIC to refer to stick celery and celery root/tuber (also often known as celeriac). However, the term refers to any part of the celery plant and other forms that originate from it, such as celery leaf, celery root, celery seeds, celery oil, celery salt, celery spice, celery seed oil and celery seed oleoresin (an oil / resin extract from celery).

**Mustard**

This term refers to the mustard plant and other products which originate from it, such as leaves, sprouted seeds, mustard flour, table mustard, mustard oils, mustard seed oils
and mustard oleoresins. The appropriate terms should be used in labelling. The rules do
not name any particular species of mustards and therefore should be applied to all types
of mustard.

Sesame

This term refers to sesame seeds, ground sesame powder and sesame oil. Products
derived from sesame seeds, such as tahini, should be clearly labelled with a reference to
sesame e.g. ‘tahini (sesame)’. The rules do not name any particular species of sesame
seeds and therefore should be applied to all.

Lupin

The term lupin is used generically in EU FIC to refer to both lupin seed and
products from it such as lupin flour. The appropriate terms should be used in
labelling. The rules do not name any particular species of lupin and therefore should
be applied to all.

Molluscs

The rules do not name any species because ‘molluscs’ includes all types of molluscs
(for example oyster, squid, cockles, mussels, winkles and scallops as well as land
molluscs like snails). Labelling of molluscs ingredients and products derived from
molluscs will need to have a clear reference to the Annex II food; for example,
‘mussels (molluscs)’, ‘octopus (molluscs)’, ‘oyster (molluscs).

Sulphur dioxide and Sulphites

This requirement relates only to products or ingredients that have had Sulphur
dioxide and sulphites intentionally added for example when used as a preservative.
The labelling rules apply to sulphites that have been deliberately added in the
preparation of the food or have been added to an ingredient used in a preparation of
the food. The rules require this ingredient to be labelled when present above
10mg/kg or 10mg/litre (calculated in terms of the total Sulphur dioxide (SO₂)) in the
finished product as consumed, i.e. prepared according to the manufacturer’s
instructions. Where there are naturally occurring sulphites or Sulphur dioxide in food
and sulphites based preservatives (even as carryover in an ingredient) have been
used and the levels are above 10mg/kg or 10mg/litre, it will need to be declared on
the label. This additive must be declared by reference to the terms ‘Sulphur dioxide
and sulphites’, ‘Sulphur dioxide’ or ‘sulphites’, depending on the form of the
ingredient added. The use of the category name (such as ‘preservative’ in the case
above) followed only by the E-number (E-220 series) food additives is required;
however under the allergen labelling rules there will need to be a clear declaration
for sulphites or Sulphur dioxide. For example: ‘Dried Apple, (Preservative: E220 Sulphur dioxide).

Cereals containing gluten

**Wheat** (such as spelt and Khorasan wheat), rye, barley and oats or their hybridized strains. Spelt and Khorasan are types of wheat, which are not suitable substitutes for people with coeliac disease and/or wheat allergy.

Cereals containing gluten will be declared in the ingredients list using the specific name of the cereal, i.e. wheat (such as spelt or Khorasan), rye, barley or oats. Where ‘spelt’, ‘Khorasan’ and ‘Kamut’ have been used; the inclusion of a specific reference to wheat would be required; for example ‘spelt (wheat)’ or ‘Khorasan wheat’ and ‘Kamut (wheat)’.

The voluntary inclusion of gluten within the ingredients list following the mandatory declaration of a cereal containing gluten is possible. However, the Regulation requires that it is the cereal that should be emphasized, rather than the gluten; for example ‘barley (gluten)’. When using a signpost to allergen information, indicating the presence of cereals containing gluten is also permitted.

Where foods have been voluntarily labelled as ‘gluten free’, they must meet the requirements set in Commission Regulation No. 41/2009 concerning the composition and labelling of foodstuffs suitable for people intolerant to gluten. Guidance on the specific requirements for ‘gluten free’ labelling can be found on [http://www.food.gov.uk/multimedia/pdfs/glutenguideance2012.pdf](http://www.food.gov.uk/multimedia/pdfs/glutenguideance2012.pdf). Ingredients which are or have been derived from cereals containing gluten will need to be emphasized within the ingredients list. This will make clear for those with an allergy to specific cereals to avoid such food; for example: ‘Codex wheat starch’; ‘barley malt extract’
Managing Allergen Information

The way we are to implement the policy and manage our Allergens is by the following instructions below.

- Hall Supervisors will visit the Kitchen 1 hour before service to discuss both Allergen information and also dietary information for all functions that involve catering.
- Every dish we produce must be on the College Allergen Sheet for the following Functions,( see Annex A). When the sheet is completed by a Trained Chef it must be sent to the following email address pmbcatering@maillist.ox.ac.uk
- For Finger, Fork and Sandwich Buffets we will put out a small sign saying ‘For allergen information please ask a member of Staff’.
- All menus around the College will have the following statement: ‘for Allergen Information please ask a member of Staff’.
- The College Website has the statement ‘for Allergen information please contact the Conference Office’.
- Outside Caterers such as A&J Catering and Woodfarm Bakery must supply the College with Allergen Information. Woodfarm bakery must supply packaging with the Allergen information in **BOLD**. A&J Catering will supply the College with standard menus with the Allergen information (Annex B) and will not change ingredients without informing the College and reproducing a new up to date Allergen List.
- Every Chef/Cook must carefully read the ingredients when making a dish as ingredient’s can change.
- It is not acceptable to have ‘May Contain’ on any of the dishes we produce in College, unless there has been a specific risk assessment carried out and there is a risk of Cross Contamination.
- Butchers will supply the College with a list of Marinades and the Allergens in them along with any other relevant information of products purchased which may contain any of the 14 Allergens.
- The Oxford College Food Quad Website will have information readily available to check for Allergens on all products brought through them. [https://www.epsys.co.uk/ox_pembroke/legacy](https://www.epsys.co.uk/ox_pembroke/legacy)
- Any Student wishing to hold an event in College must produce a risk assessment on Allergen information and also produce the standard Allergen Sheet (see Annex A).
Food Labelling

Every dish we produce and store, including in the Freezer must be labelled with the Correct College Food Label (see Annex C) which clearly shows if any of the 14 Allergens have been used. These Labels must also have the Chefs/Cooks clear initials on them for traceability.

Storage of Ingredients

Where possible all the Allergen ingredients will be stored separate in their own containers in the fridge, except Peanuts which will be stored in a separate part of the store room, in a clear plastic tub with a lid on clearly marked Peanuts only. Eggs will be stored and classed as a Raw Meat Product and therefore will be stored in the Raw Meat Fridge.

The College will use Gluten Free Flour at all times where possible.

Allergen Training

- Senior members of the College will attend an Allergen Training seminar and are listed below. (See also Annex D)
- Heads of Department will liaise with their own departments and explain the importance of Allergens and the New Allergen Law.
- Kevin Dudley: Executive Chef
- Robert Wilson: Steward
- Linsey Worrall: Sous Chef
- Archana Amin: Assistant Steward
- Adam Hagar: Junior Sous Chef
- Jason Bustin: Hall Supervisor
- Alba Casal: Farthing Café Supervisor
- Katarzyna Konieczna: Hall Supervisor