



IoH Broadsheet

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Coeliac Disease and Other Food Allergies The Impact of Natasha's Law on food services

Chef, Daniel Ayton FIH is an International Culinary Consultant and Executive Chef and is widely considered to be the most knowledgeable chef on the psychological effects of Coeliac Disease in the UK's hospitality industry.

By educating others, including running training seminars in Europe on Coeliac Disease, as well as other allergies that trigger abnormal responses to food, his expertise has helped change the landscape of catering guidance rules and the introduction of regulations.

In the latest Broadsheet, Daniel examines '**Coeliac Disease and Other Food Allergies – The Impact of Natasha's Law on food services**'. Daniel has been a member of the Institute since 2010 and became a Fellow in 2015.

Coeliac and gluten intolerance affects around 6 million people in the UK



What is Natasha's Law

Natasha's Law was introduced following the tragic death of Natasha Ednan-Laperouse who had a fatal allergic reaction to sesame flour in a baguette purchased from a UK Prêt à Manger outlet in 2016.

At the time of her death Prêt à Manger were fully compliant with the Food Information Regulations 2014 for non-pre-packed foods, which made no reference to Prepacked Foods for Direct Sale (PPDS) within the Regulations.

Following the revelation of this legal loophole, Natasha's parents successfully lobbied the UK government for 'full ingredients labelling' to be made compulsory on packaged food for direct sale, e.g sandwiches. On 1st October 2021, Natasha's Law came into force and is part of the 'UK Food Information Regulations 2014' (FIR 2014).

The reforms cover food labelling requirements that are prepared and packed on the same premises, from which they are sold; (Gavin Poole, 2019) all food manufacturers will be required by law to explicitly show every ingredient present in any food produced and packaged on site. Of those ingredients, it is essential that the presence of the allergens is specifically highlighted on any labelling (Rob Scovell, 2020).

The introduction of Natasha's Law brought essential changes to food labelling regulations providing greater transparency about what people buy and eat and highlighted the battle against the growing epidemic of allergies; protecting an estimated 2 million people diagnosed with food allergies in the UK.

However, the challenges that Natasha's Law presents impacts staff-training on ingredients and labelling, expenses relating to training and labelling, and the time it takes to label individual products. Small businesses, in particular are known to continue to struggle with the costs of implementing all of these factors (Marcel Deer, 2020).

Impact of the FIR 2014 legislation

Since 2014, the food service industry, irrelevant of size, is legally obliged to inform food consumers of food allergens present in the food served, requiring staff to be knowledgeable and diligent of food allergens and the responsibility they have to provide accurate information.

Further legal and moral obligations regulations are enforceable under EU1169/2011, EU78/2002, EU852/2004, EU854/2004 by the European Parliament.

Industry feedback

- More than two in five (44%) Food Business Operators (FBOs) said they had faced challenges around implementing the FIR 2014 legislation. 53% stated that had not faced any challenges
- Those in catering sectors were more likely than retailers to have faced challenges (47% and 35% respectively)
- The most common challenges were remembering to update and keep on top of allergen information (30%, rising to 51% among takeaway restaurants); staff training and awareness (23%) and the time it takes to regularly update information (18%)
- In addition to keeping customers safe, some businesses said that potential enforcement action for non-compliant behaviour was a key motivation, particularly the prospect of fines and criminal prosecution. This correlates with (Leitch, 2001) findings that although the industry recognised that food allergens pose a serious threat to the safety of sensitive individuals, little efforts to address the risks are taken.



Ongoing UK food challenges

1. Local Authority Inspections
The Food Standards Agency (FSA) has set out the challenges facing the UK's food system and said 'significant risks' lie ahead (Dean Best, 2022)
2. Food Poverty
As food prices continue to increase there is a real threat to the standard of food people eat. 53% of consumers say they feel 'priced out' of buying healthy food; and 25% of consumers now feel the only foods realistically available to them are heavily processed which equates to around 50% of UK households facing food insecurity. A figure likely to increase in 2025 due to weather and inflation
3. High Risk Food Imports
The UK has deferred plans to introduce full checks on EU imports drawn up after the country left the European Union, including those covering sanitary and phytosanitary (SPS) checks. This poses a significant risk as the longer the UK operates without assurance from an exporting country that products meet the UK's high food safety standards, the less confident we can be that we can identify potential safety incidents (Dean Best, 2022).

Covid19 and the food chain

The possibility of COVID-19 being foodborne is negligible. However, there is still a need for advanced research studies to fully understand the possible transmission route of COVID-19 through food.

The necessity to develop rapid and affordable methods for detection of SARS-CoV-2 throughout the food supply chain (Priyanka Sethupathy, Vidhi Gupta, 2021), will require businesses, including food providers to adopt new technologies and new ways of working as they are introduced (Just Food, 2021).

Researchers found that people who reported having a physician-diagnosed food allergy had a 50% lower risk of COVID 19 infection.

Participants who were overweight or obese were 41% more likely to be infected. For each 10-point increase in a person's Body Mass Index (BMI), their risk of SARS-CoV-2 infection rose by 9% (National Institutes of Health, 2022).

Training, training, training

The concerns of food allergy sufferers eating-out is that they must rely on the food service staff to provide them with the correct information regarding food content so they can make informed decisions about the food they order and eat.

The lack of detailed knowledge of food allergens by the food services industry and the consequences allergens have on allergy sufferers, continues to point to a lack of specific training. Training that is imperative if businesses are to avoid significant fines and help ensure consumers are safe.

Training considerations

1. Food service training needs to be specific to the work performed in the specific workplace
2. Training should incorporate practical elements instructed by external experts
3. To ensure safety co-operation and teamwork through departments and service staff is essential
4. Small food service businesses should concentrate on the ingredients before deciding on the menu to ensure they produce food fit for allergy sufferers
5. The head chef and restaurant manager should take ownership in leading the team to ensure they are all familiar with the issues and service of guests with Coeliac Disease as well as other allergies
6. The food and beverage team should create a Coeliac Management Plan (CMP). To include:
 - a. Who will speak with the guests regarding dietary needs
 - b. Who will be responsible for checking the ingredients and prevention of cross-contamination? The majority (95%) of FBOs had a policy on allergen labelling, a large increase on 2012 levels (60%).
 - c. The manager should be introduced to the Coeliac guest with a folder of best practices in place; this should include allergen sheets of all dishes served at the location
7. As with all training, you then enforce it and continually update it.

Market potential

Taking allergens seriously at a commercial level presents an opportunity for growth for many food service providers, as the statistics below suggest.

- In Coeliac UK's survey 30% of respondents said they would eat out once a week if they could be confident of finding a safe gluten-free menu option, adding up to an untapped £100 million market amongst Coeliac, their friends and family (Locke, 2010)
- According to (Datamonitor, 2010), 'The global gluten-free market is set to grow by £800m over the next five years to over £2.96bn'.
- The UK's gluten-free market will be worth the most in Europe at £250m – growing at a rate second only to Germany.

Conclusion

Understanding the Coeliac condition by the medical and scientific communities, is gaining prominence.

However, at this time awareness needs to be placed upon the hospitality industry to accommodate the needs of those with gluten-based allergies.

Improvements need to be implemented based upon an increased knowledge of food allergens and how to handle food. It is vital that safe food can be claimed to be free from specific allergens when customers place their orders with waiting or bar staff. It is also vital that those requests are passed accurately to the kitchens/ food preparation areas, and that preparation and food delivery ensures it is safe from cross contamination.

Ongoing staff training is paramount. But, while training brings about change, support systems are also required to transfer that knowledge to what can be provided in practical terms.

Hospitality leaders of the future are catalysts for innovation, knowledge sharing, and a shared vision, and need to embrace the ever-changing laws, adapt to the evolving needs of guests, and champion responsible practices.

In conclusion, there is a growing opportunity for all food businesses to not only secure consumer safety, and eliminate the threat of huge legislative fines or worse, but also gain commercial advantage. Food service business that embraces the needs of allergen and Coeliac suffers will themselves secure a portion of the growing £100 million market and consumer loyalty from some of the 6 million plus UK allergen consumers.



About the author

Daniel Ayton FIH has worked as an Executive Chef and International Culinary Consultant for many years and is an expert on the impact of Coeliac Disease and other food allergies.

In 2009 he qualified as a WACS B grade culinary judge. His graduate dissertation in 2012 looked at the Psychosocial Aspects of Coeliac Disease and how it impacts the hospitality industry; followed by a second paper in 2022 which built on the baseline study in 2012 about information on allergenic ingredients for non-prepacked foods, and how practices have changed since the Food Information to Consumers (FIC) came into effect.

Helping to educate other professionals within the hospitality industry, Daniel is passionate about ensuring that dining out is an experience that everybody can enjoy, regardless of food allergies and that feeling safe when eating out should be an option for everyone. Daniel has installed this philosophy into his everyday work practices and procedures for those working alongside him as well as influential figures across the UK's catering industry.

Daniel was awarded a graduateship from City and Guilds in recognition of his achievement through education and training, is a Fellow of the Institute of Hospitality, a Fellow of the Institute of Leadership and Management, a Patron at the University of West London, a Fellow of Westminster Kingsway College, London and a mentor at Southbank University, London.



Daniel Ayton FIH



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Food allergies have been rapidly increasing

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All range of food allergen articles, books and research are available to our members in our free IoH Library