



fwd FEDERATION OF
WHOLESALE
DISTRIBUTORS

Protecting consumers through allergen data management

Executive summary

With an estimated 2 million people in the UK living with food allergies, the food safety regulations introduced by Natasha's Law are designed to protect consumers with accurate and accessible allergen information.



Anne Godfrey
CEO
GS1 UK

Natasha's Law was introduced to protect people with allergies and give them confidence in the food they buy following the tragic death of Natasha Ednan-Laperouse, who suffered a fatal allergic reaction to sesame seeds baked into the dough of a baguette.

The legislation, which came into effect on 1 October 2021, requires any businesses selling prepacked for direct sale (PPDS) foods to provide full ingredient labelling with all allergens clearly emphasised on-pack.

Prior to Natasha's Law coming into force, GS1 UK conducted research to determine how businesses were preparing for the new rules. Our study – which surveyed food manufacturers, wholesalers, grab and go operators and more – found that the food and drink industry was in strong agreement with compulsory allergen labelling. It also revealed that, as of August 2021, four in ten across the food industry were still unaware of Natasha's Law and just six in ten had taken steps to prepare.

The FSA conducted their own [research in 2020](#) to capture baseline data on awareness and practices ahead of the legislation being introduced and found that 59% of food businesses were aware of the forthcoming PPDS

requirements. This increased to 64% among those selling PPDS foods, and to 79% for businesses that only sold PPDS foods.

A more recent [survey carried out by the FSA in March 2022](#) to assess the implementation of Natasha's Law since 1 October 2021 found that, of 150 businesses surveyed (who all sell PPDS food), 95% were aware of the PPDS requirements. The FSA will carry out a more extensive evaluation of PPDS implementation from October 2022.

While awareness of the requirements set out by Natasha's Law is now high, there are still barriers to effective implementation. One of the main concerns is whether businesses can reliably source accurate, up to date allergen information and ensure it is easily available to customers. Therefore, it is vital that the whole food supply chain has the ability to capture and access the full range of allergen data. Food businesses also need to meet their legal requirements for providing accurate allergen information on 'non-prepacked' food. Although 'non-prepacked' food does not need to be labelled, accurate allergen information must be provided to the consumer in writing or verbally.

“Following the introduction of Natasha’s Law, we are keen to be involved in bringing together each level of the supply chain to the end customer, to understand the challenges involved in the sharing of accurate allergen information across the food service sector.

“Building on the disciplines and use of accurate data, is the opportunity to demonstrate how the sharing of allergen information with consumers can be further improved using QR codes.”

Adam Hope, Birchall Foodservice



Introduction

As part of this collaboration, GS1 UK facilitated a workshop to identify potential opportunities for improving allergen data sharing. Along with the FSA, this session included a wholesaler, supplier and a caterer.

The sponsors from each organisation are:



Coral Rose
MD of The Country Range Group and former chair of the FWD



James Bielby
Chief executive, FWD



Julia Pierce
Director openness, data and digital, science, and Wales, FSA



Diane Barlow
Chief information officer, FSA



Steve Richards
Retail engagement manager, GS1 UK

The workshop recognised that current ways of working with allergen data could be improved throughout the supply chain as standards and processes may differ between actors.

The proper use of Global Trade Item Numbers (GTINs) as unique identifiers at the start of the process would help ensure traceability throughout the supply chain. Cross-industry collaboration is also required to support the development of accessible, easy to use technology underpinned by user training.

GS1 UK recommends education and adoption of GS1 standards throughout the wholesale community, supported by the development of more robust processes, improved technology, and a commitment to training.

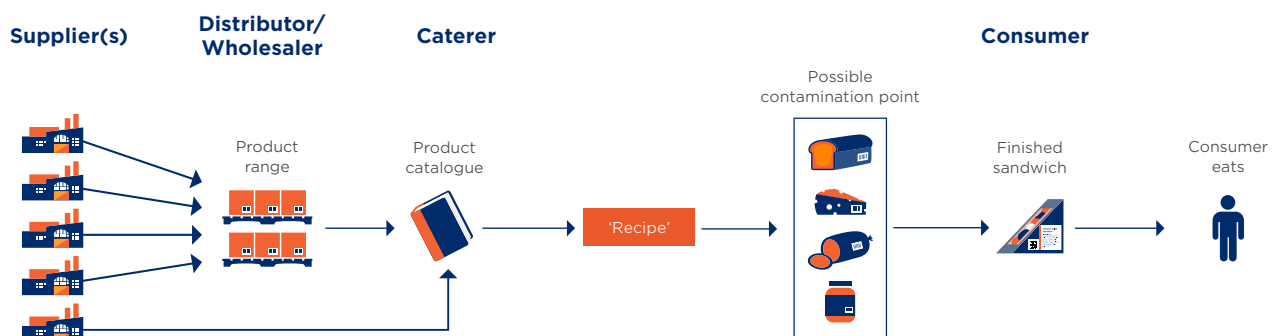


Approach

The workshop facilitated by GS1 UK was held on 26 January 2022 with an aim to identify some of the key issues and barriers creating challenges for food service trading partners in providing accurate allergen data. Attendees included representatives from the Food Standards Agency (Digital and Data Team), Birchall Foodservice, Quorn Foods and Burnley College.

Recognising that each individual business within the supply chain would bring its own set of challenges, opportunities and ideas to the table, the key objectives of the workshop were to:

- Understand the challenges around the sharing of accurate allergen data along the food service supply chain and to the end consumer.
- Use participant experience to map out processes, help understand data ‘pain points’ and identify opportunities to improve the sharing of allergen data.



“The food industry is under huge pressure following the pandemic recovery and must prioritise its focus. We are encouraged by the collaborative work being undertaken to improve the accuracy and exchange of allergen data in the food service sector.”

Diane Barlow, FSA

Key findings

The main themes identified in the workshops were people, process, standards and technology.



Process

Aligning process and regulated systems would:

- Improve data input and sharing between companies, individuals and across software
- Improve efficiency, reducing admin, increasing trust, lowering risk of error and improving accuracy



Technology

There are several technology providers in place, however:

- Data is shared between suppliers, wholesalers and caterers but not everyone uses the same technology. There are also limitations from a tech perspective at the labelling stage of the process. This can make it difficult to provide allergen information, even if the accurate data is available
- There is limited confidence in allergen data being accurate on systems

Allergen data should be readily available to all consumers. As well as being clearly visible on the outer packaging of all prepacked and PPDS foods, 90 per cent of UK consumers own a smartphone and QR codes on pack could potentially connect them to multiple sources of enriched content providing additional information, support or guidance. But we must not forget the 10 per cent who do not have a smartphone. They must not be disadvantaged from accessing allergen information.



Standards

There are many ways of handling data. What is needed is accuracy, standardisation and compatibility:

- A key challenge identified in the workshop is that common standards are not used across the data input and sharing process. GTINs are only used by some producers and wholesalers and not at all by caterers. This causes significant challenges in the accurate creation of barcodes and data standards
- Without GTINs, accurate barcodes cannot be created, slowing processes and creating inaccuracies
- There are different data models used across the sector but, with no standardisation, problems can occur



People

Any person involved in the handling of food supply chain data is potentially important in effective allergen management and the provision of accurate data. Proper due diligence is always required along with improvements in data management, utilisation of technology and training.

Consumers need confidence in the accuracy of allergen information.

GS1 UK recommendations

We recommend a commitment to developing:



Process

- Industry to build consistent processes for data sharing and input
- Accepting meaningful change to existing process, especially at the caterer end of the supply chain



Technology

- Implement new systems, updating existing systems, and introduce further common data standards to help data exchange across food industry
- Develop easier to use accessible technology, backed by appropriate training to help all prospective users access and utilise allergen data



Standards

- GS1 standards uniquely identify, capture, and share information, in a common format, open to and shareable by all
- The GTIN will uniquely identify every component within the supply chain and enable tracking through manufacturer, supplier, wholesaler, and end user systems
- Using GTINs and adopting proactive GTIN management, is critical at the start of the process and should be used throughout the supply chain. It is potentially lifesaving that accurate allergen data is passed along the supply chain. From raw materials to the end caterer who is making a PPDS product (the 'recipe'). It is important to ensure new GTINs are issued if ingredients or allergens change
- The use of GTINs reduces admin errors and will enable more efficient use of industry databases



People

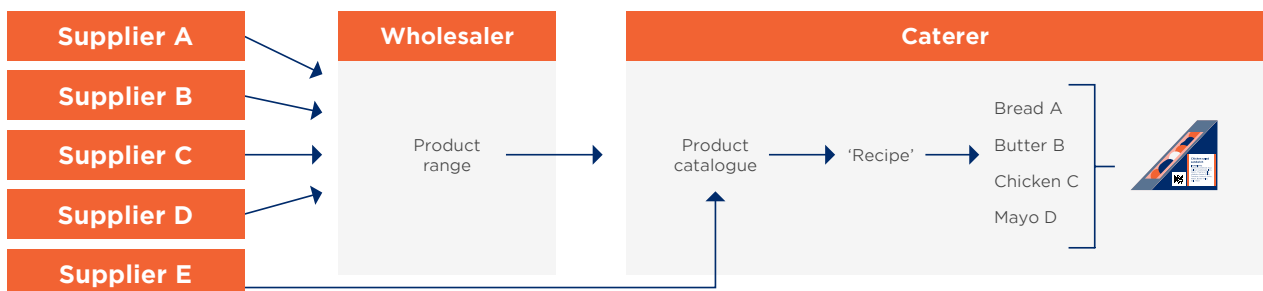
- Training and motivation on the benefits of using standards throughout the supply chain
- Increased take up of education and training to prepare and implement PPDS requirements (The FSA has produced resources on the PPDS legislative requirements and the information that consumers need)

“ The foundation to being able to offer the consumer a reassuring experience, is the ongoing capture of accurate data in the out of home sector. A key part of this is GS1 standards and the unique identification of products using a GTIN. Building on this, ongoing GTIN management is important if a products components change, and ensuring the clear communication of that throughout the supply chain through to the caterer.”

Carol Rose, MD of The Country Range Group and former chair, of the FWD

Top tips for business:

1. **Understand:** What are your pressure points around the ingesting, handling and sharing of allergen data?
2. **Identify:** What are the main risk points for your business? Where are the gaps and who do they sit with?
3. **Educate:** What training, education and upskilling is required to improve the ingesting, handling and sharing of allergen data for your business? What does this look like internally across teams or externally with trading partners?
4. **Act:** What are the basic first steps needed to improve the way your business manages allergen data? What is needed to put these first steps in place?
5. **Verify:** What positive changes have you seen within your business around the management of allergen data and how can these success stories be shared to improve customer safety across industry?



A look to the future

Clear first steps in allergen data management rely on the correct identification of products at the start of their journey, followed by adequate systems and processes which will enable the accurate flow of data to the end consumer.

As supply chains become increasingly digitised in line with business and consumer needs, our steering group has looked to the future to explore the art of the possible. By combining GS1 standards and the technology of today with the process and systems of tomorrow, we have created a consumer centric proof of concept that enables instant access to accurate allergen data at the scan of a QR code. This combines both GS1 standards and the technology of today with the processes and systems of tomorrow.

This proof of concept could be applied not only to prepacked and prepacked for direct sale food, but also to all non-prepacked food sold out of home, in canteens, restaurants, pubs, and bars.



“Effective implementation of this vital law is paramount to ensuring the safety of all consumers. We are therefore calling for greater industry transparency and collaboration alongside the increased digitisation of food supply chains. Combining consistent, standardised processes with accessible support and training will help manufacturers, retailers and business owners accurately track food item ingredients, keeping consumers informed and protected with data they can trust.”

Anne Godfrey, CEO of GS1 UK

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