

BIM Guidance Note for Seafood Retailers

Allergen Information for Consumers

1. What foods are considered allergens?

Fish, crustaceans and molluscs are all allergens. In addition, there may be other allergens such as eggs, milk and mustard present in value-added products. Sulphur dioxide, which is also an allergen at concentrations of more than 10 mg/kg may be present in prawns as it is commonly used as a preservative. Condiments used may also contain allergens e.g. garlic butter which contains milk.

Food ingredients that must be declared as allergens in the EU

1. **Cereals containing gluten**, namely: wheat (such as spelt and khorasan wheat), rye, barley, oats or their hybridised strains, and products thereof, except:
 - (a) wheat based glucose syrups including dextrose
 - (b) wheat based maltodextrins
 - (c) glucose syrups based on barley
 - (d) cereals used for making alcoholic distillates including ethyl alcohol of agricultural origin
2. **Crustaceans** and products thereof
3. **Eggs** and products thereof
4. **Fish** and products thereof, except:
 - (a) fish gelatine used as carrier for vitamin or carotenoid preparations
 - (b) fish gelatine or Isinglass used as fining agent in beer and wine
5. **Peanuts** and products thereof
6. **Soybeans** and products thereof, except:
 - (a) fully refined soybean oil and fat
 - (b) natural mixed tocopherols (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, and natural D-alpha tocopherol succinate from soybean sources
 - (c) vegetable oils derived phytosterols and phytosterol esters from soybean sources
 - (d) plant stanol ester produced from vegetable oil sterols from soybean sources
7. **Milk** and products thereof (including lactose), except:
 - (a) whey used for making alcoholic distillates including ethyl alcohol of agricultural origin
 - (b) lactitol
8. Nuts, namely: almonds (*Amygdalus communis* L.), hazelnuts (*Corylus avellana*), walnuts (*Juglans regia*), cashews (*Anacardium occidentale*), pecan nuts (*Carya illinoensis* (Wangenh.) K. Koch), Brazil nuts (*Bertholletia excelsa*), pistachio nuts (*Pistacia vera*), macadamia or Queensland nuts (*Macadamia ternifolia*), and products thereof, except for nuts used for making alcoholic distillates including ethyl alcohol of agricultural origin
9. **Celery** and products thereof
10. **Mustard** and products thereof
11. **Sesame seeds** and products thereof
12. **Sulphur dioxide and sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total SO₂ which are to be calculated for products as proposed ready for consumption or as reconstituted according to the instructions of the manufacturers
13. **Lupin** and products thereof
14. **Molluscs** and products thereof

2. Fish sold loose or packed on the premises from which they are sold (single ingredient products)

2.1 Common fish and shellfish species

Where the name of the food clearly refers to the name of the allergen, there is no need for a separate allergen statement.

For fish species that are very familiar to the Irish consumer and as such are easily recognised as “fish” there is no need to include the word “fish” once the species name is clearly written on the label/notice on or beside the product.

Example: Salmon/Cod: It would be clear to the average Irish consumer that these are fish, so once the species name (Salmon/Cod) is written clearly on the label/notice that is sufficient information.

If there is any doubt about the need to include the word fish, crustacean or mollusc, as well as the species name, then it should be included as outlined in section 2.2

2.2 Lesser known fish and shellfish species

For lesser known fish and shellfish species which the consumer may not be familiar with, it may not be clear that the product is an allergen or which is the correct allergen category e.g. is squid a crustacean or a mollusc? Is ray a crustacean or a fish? For such products, where the consumer might be confused, allergen information can be provided using either of these options:

Option 1

Include the word crustacean or mollusc or fish as appropriate on the label/notice on or beside the product.

Option 2

An allergen chart beside these products or a notice placed in close proximity to the products, directing the customer to where the allergen information is located in the shop.

3. Value-added products sold loose or packed on the premises from which they are sold (multi-ingredient products)

These products typically include fish cakes, fish in a sauce and breaded fish products. When packed on-site, it is not necessary to include a list of ingredients but information on any allergenic ingredients must be provided using the word “Contains”

Option 1

A notice placed beside the products listing the allergenic ingredients:

Example “Contains fish, crustaceans and eggs.”

Option 2

An allergen chart beside these products or a notice placed in close proximity to the products, directing the customer to where the allergen information is located in the shop.

While it is not necessary to provide a list of ingredients for these products, the business may choose to voluntarily include the full list of ingredients. If they do so, the allergenic ingredients must be emphasised in a typeset that clearly distinguishes it from other ingredients e.g. bold font or underlining.

4. Fish packed on another premises (single ingredient products)

For common fish and shellfish species, it may not be necessary to include the word fish, crustaceans or molluscs (see 2.1) once the species name is clearly written on the package or label attached thereto.

For lesser known fish species it may not be clear to the consumer that the product is an allergen or which is the correct allergen category. For such products, the name of the allergen (fish, crustacean or mollusc) should be included on the package or label attached thereto.

5. Value-added products packed on another premises (multi-ingredient products)

For these products, a full list of ingredients must be included on the package or label attached thereto. The allergenic ingredients must be emphasised on the list of ingredients in a typeset that clearly distinguishes them from other ingredients e.g. bold font or underlining.

It is sufficient to list and emphasise the name of the fish for species that are well known to the average consumer e.g. **salmon** and **cod**. For lesser known fish species, the name of the allergen should be included and emphasised in the list of ingredients e.g. squid (**mollusc**), pangasius (**fish**).

6. Precautionary Allergen Labelling

Precautionary declarations such as “may contain...” or “prepared in a kitchen that uses...” are voluntary declarations but do not satisfy the requirements of food allergen information stipulated in S.I. No. 489 of 2014 for non-prepacked foods.

7. Allergen Management Programme

The business should have an allergen management programme in place to address areas such as:

- supplier control
- segregation of product
- cross-contamination
- staff training
- labelling

This allergen management programme should form part of the Food Safety Management Programme for the business.

For prepacked products, the allergen information must be provided on the package or on the label attached thereto.

Products packed on another premises even if owned by the same business are considered prepacked products and must comply with the full labelling requirements outlined in the Food Information Regulation (EU) No.1169/2011.

They must also comply with the requirements in Regulation (EU) No.1379/2013 where relevant (see references for details).

SEAFOOD RETAILER ALLERGEN CHART

Business Name _____ Date Updated _____ Signed _____

Fish and Shellfish:

Allergen	Examples
Fish	Salmon, Trout, Mackerel, Cod, Haddock, Whiting, Hake, Plaice, Monkfish, Tuna, Megrim, Halibut, Lemon sole, White sole, Ling, White pollock, Black pollock, Turbot, Ray, Brill, Dover sole (black sole), John dory, Herring, Smoked coley, Pangasius, Red gurnard, Sardines
Crustaceans	Lobster, Crab, Prawns, Shrimp
Molluscs	Oysters, Mussels, Scallops, Whelks, Cockles, Clams, Razor clams, Periwinkle, Squid

Other Products:

Product Name	Allergen Information Contains
Fish Cakes	Fish, Crustaceans, Egg, Mustard
Seafood Mix	Fish, Crustaceans
Fish Kebabs	Fish, Celery
Stir-Fry Mix	Fish, Crustaceans, Celery
Breaded Cod Goujons	Fish, Mustard, Wheat
Salmon Burgers	Fish, Eggs
Garlic Butter	Milk
Prawns	Crustaceans, Sulphites

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References

- Regulation (EU) No 1169/2011 on the provision of food information to consumers **(FIC)**
- Regulation (EU) No 1379/2013 on the common organisation of the market in fishery and aquaculture products, **(CMO)** Chapter IV Consumer Information Articles 35-39
(Consumer information requirements outlined in Articles 35-39 applies to fish to which no other ingredient except salt has been added. The mandatory information outlined must be provided for both prepacked and non-prepacked products.)
- Statutory Instruments (S.I.) No. 489 of 2014 Health (provision of food allergen information to consumers in respect of non-prepacked food regulation 2014)
- Guidance Note No. 28 Food Allergen Information for Non-Prepacked Foods in Ireland: Food Safety Authority of Ireland (FSAI)

Further Information

The information contained in this document is for guidance purpose only. If your company is designing new packaging or labels we recommend that you visit the Food Safety Authority of Ireland (FSAI) website www.fsai.ie in advance to ensure that it is fully compliant with all relevant legislation. For further information on provision of allergen information, contact Eileen Soraghan in BIM, email eileen.soraghan@bim.ie or tel **+ 353 (0)1 214 4112**.