

Common causes for allergen recalls

In collaboration with Food & Drink Federation (FDF) and Campden BRI

Thank you for waiting, the webinar will commence shortly

3 June 2025



Today's speakers



Kelvyn Sampson

Retail, Food, Beverage &
Leisure Industry Practice
Leader
Marsh UK



**Olayemi Fashesin-
Souza**

Regulatory Manager, FDF



Wendy Duncan

Safety, Quality and
Allergens Manager,
Campden BRI



Anna Maria Xenaki

Product Risk Managing
Consultant
Marsh UK



Tim Nash

Head of Product Recall
Marsh UK



Q&A

Audience members can submit questions for the panel by typing them into the Q&A window at the bottom of your computer screen.

If a question is not answered during today's programme, someone from Marsh will respond as soon as possible.

Why are we here today?

Our aim of the webinar is to help enhance your understanding of food safety and allergen management

Our aim is to focus on the critical topic of food safety recalls and why they happen, providing additional insights on allergens and their impact on the industry.

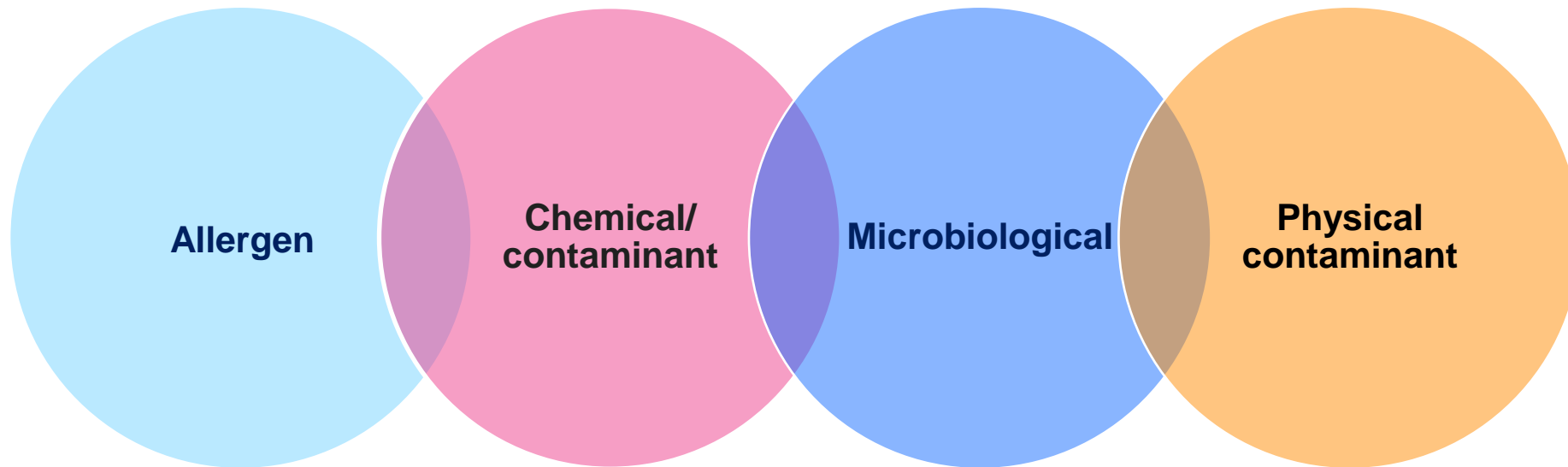
Topics to be covered include:

- The contributory factors that lead to food safety incidents and recalls
- Insight into the primary reasons for the rise in allergen recalls and how to avoid them
- Real-world examples of good practice in food recalls and lessons learned
- The insurance claims costs associated with allergen recalls

Food safety incidents and allergen recalls

What do we mean by food safety incidents?

A food safety incident is any situation involving a risk to consumers from the consumption of food, often leading to a product withdrawal or a recall



Why a particular attention should be posed to allergen recalls?

When talking about consumers with allergies, it's not about preference; it's about prevention when taking “life or death” decisions

- Allergens are a non-threshold hazard – even trace amounts can be fatal
- Legal obligation to declare 14 allergens under UK/EU law
- Zero tolerance from regulators and consumers: small errors = big consequences

Costs of recall

Allergen recall are associated with costs

The cost of recall depends on:

- a) Where a manufacturer sits within the supply chain
- b) The nature of the recall

There are various types of costs:

- Communication
- Transportation and logistics
- Storage facilities
- Examination
- Destruction/disposal/further processing
- Loss of sales
- Brand reputation

Recent trends and data in the UK

Food allergen recalls

- 40% of recalls between 2016 - 2021 in the UK are caused by **missed priority allergens from ingredient list**
- Over 500 food allergen incidents reported to FSA between 2022-2024
- **Allergens** accounted for 43% of incidents reported
- Recent allergen incident example – peanut in mustard case (2024)

Guidance for food businesses

Best practice guidance for food businesses

This guidance highlights important factors that should be considered when businesses assess allergen risks

The guidance includes various topics:

- Outlines steps to be integrated into food safety management procedures to reduce the risk of allergen-related recalls
- Breaks down of the 4 common reasons of allergen recalls & offers key prevention considerations for each reason
- Provides useful areas of focus when investigating the causes of allergen-related incidents to prevent future occurrences



[Allergen Recall Prevention Guidance](#)

Main aim of the guidance is to help food manufacturers identify issues leading to allergen incidents and determine actions to prevent recurrence.

Common pitfalls to avoid / advice to business

We see too often businesses experiencing:

- Precautionary “may contain” labels protect against liability, but they don’t if used inappropriately
- Inadequate validation and verification of cleaning procedures. The likelihood of unintended allergens must be minimised
- Lack of robust food allergen mapping needs to be regularly reviewed and updated accordingly
- Inadequate specification controls system. A robust supplier approval programme and supply chain mapping to highlight high risk potential problems are required



Advice to food businesses:

- Risk assessment across entirety of operations
- Understand unique processes, suppliers, products and supply chain
- Continuously improve allergen management plans by applying findings from root cause investigations
- Best practices for segregation and cleaning
- Labelling and pack design checks
- Managing supplier and co-manufacturer risks
- Communication and training



Poll 1

What is the biggest allergen risk in your business?

Options:

- Label or packaging errors
- Cross-contact during production
- Inaccurate supplier info
- Staff training gaps
- Unsure

Food for thought

Multiple problems
can cause food
allergen recalls

Continuously review
allergen management
systems

Investigate all food
incidents including
“near misses”

Allergen risk
management
should cover all
operational stages

Develop mitigation
steps to prevent
future incidents

Good and bad practice on allergen recalls

Good practices vs bad practices

The aim of this section is to showcase what companies often get wrong during allergen recalls and how these lessons can prevent future incidents

Examples are from our past industry experience:

Bad practices

- ✗ **No recall preparedness** i.e. assuming “it won’t happen to us” and skipping scenario testing
- ✗ **Lack of formal allergen management plan**, relying on informal processes or general hygiene protocols
- ✗ **Inadequate food allergen mapping**, with no full assessment of allergen flows, shared lines, or storage risks
- ✗ **Confusing precautionary labelling or outdated supplier allergen info**, i.e. wrongly assuming previous allergen declarations remain valid indefinitely

Good practices

- ✓ **Mock recall/ scenario testing**, e.g. regular allergen recall simulations to test traceability and crisis roles
- ✓ **Allergen management system**, e.g. a clear, documented allergen control plan integrated into site quality systems
- ✓ **Allergen mapping**, e.g. full mapping of allergen presence across raw materials, lines, equipment, and zones
- ✓ **Proactive internal controls**, e.g. allergen mapping, clean-down validation, pre-launch reviews, allergen review as part of NPD/recipe change process

Recent allergen examples

Case of cheese product with undeclared egg (2021)

Simple label error on a basic product led to a national recall

Case of carrot cake cookies containing milk (2023)

Allergen not transferred onto final pack due to process oversight

Lessons Learnt

- Not only regulatory compliance, best practice and guidance important too.
- Clear, accurate labelling and correct packaging.
- Internal processes validated and verified to prevent and detect issues before an incident.
- Allergen checks should be part of final pack verification, not just recipe-level checks.
- Allergen matrices should always be updated when recipes or suppliers change.
- Robust internal traceability and testing program is vital.
- Speed, transparency, and ownership of recall comms.
- Implement, review, and test an incident management process.

These all help to protect the consumer and your brand and company reputation

Characteristics of strong allergen controls

Businesses that rarely face allergen recalls showcase the following traits

Practical habits we see in food businesses that have built robust, resilient allergen control into their day-to-day operations.



Embedded allergen control into **quality culture**



Internal traceability tests done periodically



Dual verification of allergen declarations and labels



Incident response plans that include “**allergen near-misses**” scenarios



Clear ownership – someone responsible for allergen risk at every production/ manufacturing site



Learning from **past recalls**

Practical tips for businesses

Conduct a label audit:

- Compare product labels against current recipes and allergen specs

Re-check supplier allergen declarations:

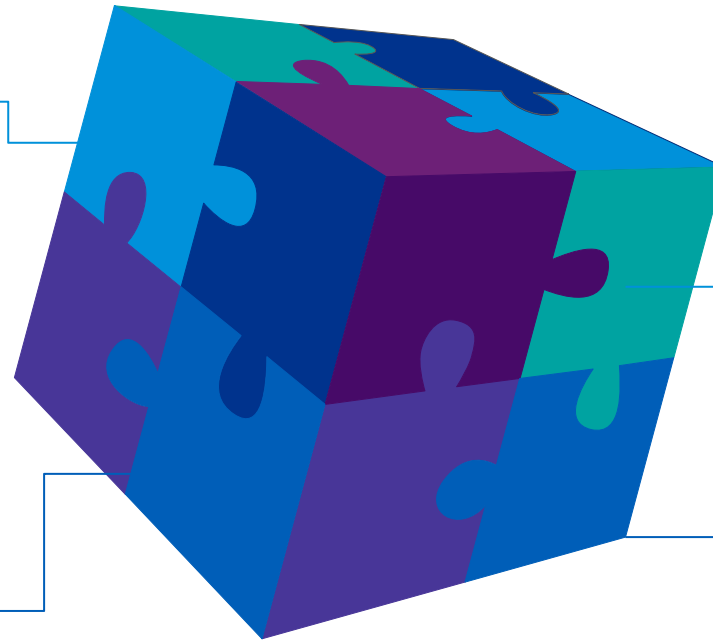
- Especially for minor ingredients and spice blends

Train line leaders and packers on allergen-critical steps:

- E.g. label checks, clean-down signoff

Run an allergen recall simulation:

- Who responds?
- How fast?
- What gets communicated?



The businesses that succeed in allergen control are the ones who treat it as a constant priority, not a one-off project

Poll 2

Do you currently have product recall insurance that covers allergen incidents?

Options:

- Yes, and we've reviewed it recently
- Yes, but we're not sure what's covered
- No, but we're considering it
- No, and it's not on our radar
- Not applicable to our business
- Unsure if we have product recall insurance

Recall insurance claims and coverage

Introduction to recall insurance

Product recall insurance covers the cost associated with recalling a product that poses a health risk

Accidental contamination

Foreign material in a product which would result in bodily injury. This could also include a mislabelling event of allergen

Product extortion

Member of public threatens to inject poisonous substance into product unless an extortion is paid. The Extortion threat needs to result in bodily injury

Malicious product tamper

Disgruntled employee tampers with the product in production, which results in bodily injury of renders it unfit for sale

Government recall

Government regulator mandates a recall as they deem there to be a bodily injury risk or you come to the same conclusion as them and initiate a voluntary recall. This would include a class I or II recall in the US. Alternatively, the regulator forces you to suspend manufacturing due to the imminent risk to consumers

Adverse publicity

Public perceive there to be an issue with the product, which would cause them bodily injury based on the content from Twitter, Facebook etc

Product defect

A design error or manufacturing error in an insured product that when used for its intended purpose has caused or is likely to cause bodily injury

What costs could be covered under recall insurance?

Recall insurance is critical financial protection, especially in allergen cases

With allergens being a common trigger for covered recalls, examples of costs typically covered:

Pre-recall expenses	Recall costs	Replacement costs	Destruction costs
Identification, tracing and sorting	Transportation	Hire of temporary storage space	Cost of hiring additional staff
Rework, repacking, relabelling and redistribution	Third party recall, replacement, and destruction expenses	Loss of gross profit	Product rehabilitation
Increased cost of working	Extortion costs	Defense costs	Consultant costs

The costs go far beyond just pulling product off shelves. Retailer penalties, lost sales, reputational damage, all adds up quickly. ***One undeclared allergen can easily become a six or seven-figure event***

How to make sure you are covered?

Many food businesses think they're covered, until a claim is denied

- ✓ Be honest and thorough in **risk disclosures** to your broker
- ✓ Keep **allergen control procedures documented**: label checks, training, audits
- ✓ Know your **policy triggers**: accidental contamination, mislabelling, allergic reactions?
- ✓ Align your **crisis management plan** with insurer expectations
- ✓ Work with a broker to regularly **review and update coverage**

What insurers really want to see is that you've done the work: controls, traceability, planning, and training

Conclusions

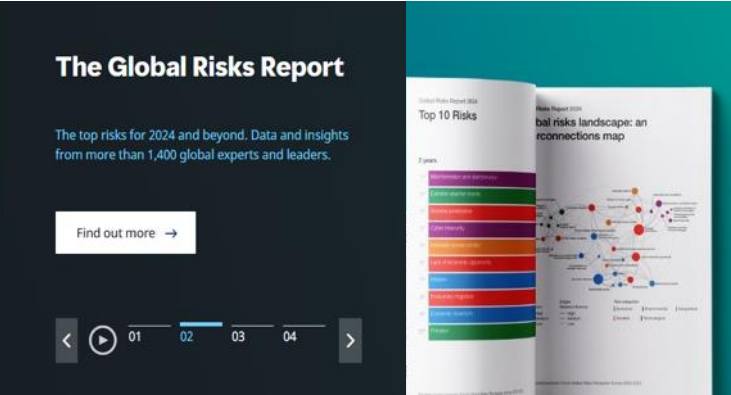
Closing remarks

- Consumer trust can be lost quickly and recovered slowly
- Allergen recalls can always happen; though they are preventable — but only with consistent controls
- Remember to consult with the Food & Drink Federation Guidance (FDF) guidance that offers a practical foundation for prevention
- Recall insurance is not a replacement for good risk management — it's a backstop

**Thank you for
joining us**

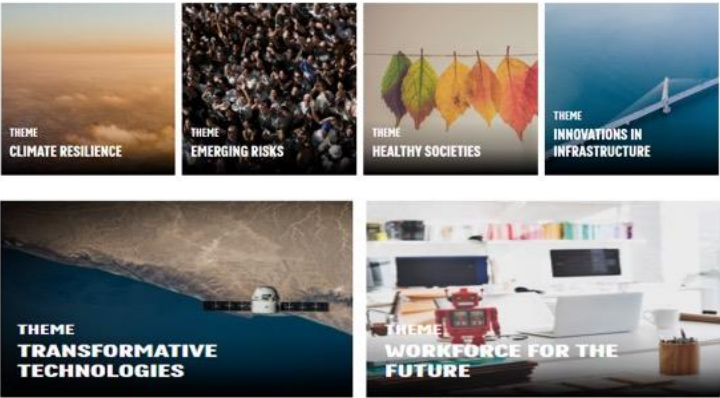
Our thought leadership

Global challenges

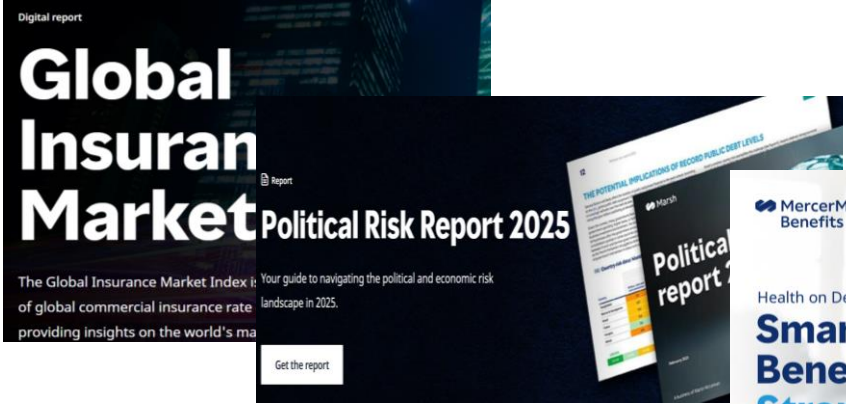


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