

Food Safety and Labelling Guidance for small scale home producers of chutneys, pickles, flavoured oils and jams

General Food Safety Advice

Registration

Food business operators need to register their food business with the local authority where they are based 28 days before trading. This is a legal requirement and is free of charge. Please contact the Food Health and Safety team for more information placehealth@scotborders.gov.uk or 01835 824000.

General Hygiene

Anyone who prepares and sells food (even for one-off events) is required to make sure the food they supply is safe to eat. The ingredients used, the premises in which the products are made, the method of production and the person making the food all have an impact on the safety and quality of the final product.

How well you comply with the law will be assessed by the inspecting officer when he/she carries out routine hygiene or food standards inspections or when collecting food samples.

More information on food inspections can be found at:

http://www.scotborders.gov.uk/info/1231/environmental_health/842/food_safety_and_hygiene/2

Food Hygiene Training

Food handlers should be trained, supervised and/or instructed to a level appropriate to their work activities. To fulfil this legal requirement, it is recommended that food handlers undertake training to a level equivalent to the Royal Environmental Health Institute of Scotland Level 2 Award in Food Safety. More information on food hygiene courses can be found by contacting Food Health and Safety team or Borders College in Galashiels.

Food Safety Management

Even if you are a small business the law requires you to have a documented food safety management system based on the principles of HACCP (Hazard Analysis and Critical Control Point). This is a way of managing food and safety 'hazards' in your business. The procedures need to be appropriate for the nature and size of your business and must be kept up to date. You will also need to review your procedures from time to time, especially when something changes.

HACCP is a preventative approach to food safety management based on the following seven principles:

1. Identify what could go wrong (the hazards)
2. Identify the most important points where things can go wrong (the critical control points – CCPs)
3. Set critical limits at each CCP (e.g. cooking temperature/time)
4. Set up checks of CCPs to prevent problems occurring (monitoring)
5. Decide what to do if something goes wrong (corrective action)
6. Prove that your HACCP Plan is working (verification)
7. Keep records of all of the above (documentation)

Food Standards Scotland has developed Cook Safe for small catering and Retail Safe for retail businesses to help these businesses comply with food hygiene regulations. Many small food businesses will be able to have simple procedures and simple records.

What are the hazards?

Clostridium botulinum

Clostridium botulinum is a type of bacteria that grows under anaerobic conditions (i.e. without air) and can produce a harmful toxin (poison) in food which causes the serious illness botulism. This is a potentially fatal form of food poisoning, although it is rare in the UK. The spores of *C. botulinum* are widely distributed in the environment and may be present in a range of foods, including fruit or vegetable ingredients used to make chutneys, jams, pickles and flavoured oils. Storing these products in sealed bottles (and particularly storing them in oil) can create the right conditions for the bacteria to multiply and produce botulinum toxin.

Due to the high sugar content in jam and the acidic nature of chutneys, pickles and flavoured vinegars, any harmful and/or spoilage bacteria are unlikely to grow. Because some fungi are more tolerant of acid and or high sugar conditions, there is a small possibility of them growing, depending on the recipe, how the product is made and stored, as well as how long and under what conditions it is kept once opened.

Flavoured oils are different because they are not acidic. Outbreaks of *Clostridium botulinum* have been associated with flavoured oils because they normally have a higher pH higher than 4.5 and the oil provides an air-free environment for the spores to germinate and the bacteria to multiply and produce toxin. Trace amounts of moisture could create an environment or bacteria to survive and grow, and this can potentially be added in the form of vegetable, spices, herbs or bottles that have not been thoroughly dried.

Moulds

Moulds and yeasts can contaminate products if the jars, bottles or lids are not clean or if the product is not sealed quickly after filling. Growth can then occur once the product is opened and exposed to air.

Physical contamination

Cracked or chipped jars, bottles or damaged lids can cause physical contamination of the product as can foreign objects harvested with fruit and vegetables e.g. stones, slugs and insects. There may also be an increased risk of microbiological contamination from cracked and chipped bottles and jars as they are difficult to thoroughly clean.

What should I do to control hazards?

For all products

Wash your hands before preparing or handling food

Ensure chopping boards, pans and utensils are clean and disinfected and kept in good condition

Use clean disinfected jars/bottles and invert them after disinfection until you are ready to fill them, to prevent foreign body contamination. Disinfect them by placing them in the oven (10 minutes at gas mark 3/160°C), by passing them through the hot cycle of the dishwasher or submerging them in hot water (above 90°C) for 10 minutes. Jars and bottles must be fully dry before use.

Whilst current food safety legislation prohibits the re-use of food containers such as jam jars there is no evidence to suggest that this practice presents a food safety concern. The law is aimed at large scale production and concerns all food containers and the migration of chemicals from containers into food when they are re-used. As long as basic food hygiene rules are followed as mentioned above it should be just as safe to clean disinfected jam jars as it would be to use brand new ones. It is always good practice to review the condition of your jam jars on a regular basis. Jars should be checked carefully before reuse, and they should be discarded if they are cracked or chipped,

Store products in a cool, dry environment.

Unless you have undertaken independent analysis it is difficult to determine an appropriate shelf life for your product. Some recipes give an indication of shelf life but this may not have been assessed by a microbiological laboratory. Never exceed the shelf life and it would be sensible to give your products a shorter shelf life than stated unless you have used an accredited microbiological laboratory to undertake a shelf life study,

Always stick to standard recipes and cooking methods; the amount of vinegar and/or sugar is essential for safety. For example, ensure weights of ingredients are known and follow instructions on how long to boil/simmer each batch,

Keep records of each batch produced. This would typically include the food name, date of production, number of jars/bottles produced, use by or best before date, lot or batch number, records of any temperatures or pH measurements. If you supply other businesses, you must be able to identify what you have supplied them with, in case you need to recall the food in the event of a problem.

For jams, pickles and chutney

Thoroughly wash, dry and where necessary peel fresh fruit, vegetables and herbs,

Ensure lids/stoppers are clean and tight fitting but do not re-use lids. Lids must be put on immediately after bottling, whilst the product is still hot for the vacuum seal to be formed,

Use a jam thermometer to ensure the jam is heated to the correct temperature (setting point). Jam sets around 105°C. Heating to this temperature will destroy a significant number of harmful bacteria. The setting point of low sugar jams will vary,

For pickles and chutneys, it is important to ensure the pH is 4.5 or lower and/or the water activity is below 0.9 throughout the product during the shelf-life to control the risk of *C.botulinum*. If this cannot be guaranteed, products should be stored in a refrigerator, even before they are opened.

Extra controls for flavoured oils

When making flavoured oils, use dried herbs, spices and vegetables to ensure that moisture levels are kept to a minimum or thoroughly dry ingredients well before adding. The bottles used should be completely dry before used to store flavoured oils,

Ensure that the pH is consistently pH 4.5 or lower throughout the product including the added ingredients. Acids including phosphoric, citric or acetic acid can be added to oils to help reduce the pH, pH meters should be used. Litmus paper can offer a guide but is not very accurate. This is a critical control point and must be followed to protect consumer safety.

The maximum shelf life of the product should be 10 days. It can be kept for longer if the pH is shown to be 4.5 or lower for the duration of its shelf-life. This must be determined by independent analysis.

Food Labelling

If you selling food via another retailer, the food is considered to be sold pre-packed and must be labelled with the following information:

- Name of the food – a name sufficient to inform a purchaser of the food's true nature and distinguish it from other products with which it could be confused or a reserved description (see below under jam, jelly and marmalade),
- List of ingredients – in descending order by weight,
- Percentage quantity declaration (QUID) for any ingredients given emphasis on the label such as in the name of the food or by pictures e.g. apricot chutney would require a declaration of the percentage of apricot used,
- A best before or use by date. 'Use by' dates relate to food safety and 'best before' to food quality. Flavoured oils should have use by date,
- Any special storage conditions or instructions for use (e.g. flavoured oils 'store in the fridge below 8°C before and after opening'),
- The name and address of the manufacturer, packer or seller,
- Any specified allergens or ingredients derived from the allergens must be clearly declared in the ingredients list if they are not already in the name of the food. The specified allergens are cereals, containing gluten, crustaceans and molluscs, eggs, fish, soybeans, milk, peanuts, nuts, celery, mustard seeds, sulphur dioxide and sulphites (above 10mg/kg or 10mg/L), sesame seeds and lupin. More information on food allergen labelling can be found on: <http://www.food.gov.uk/safereating/allergyintol/label/>
- If any ingredients that has been irradiated or genetically modified this must be declared.

When you are selling the food products packaged yourself, they are classed as pre-packed for direct sale and do not require full ingredients labelling. The name or business name and the address of the producer that is responsible for the food information on a product must be indicated on the label. A contact telephone number, e-mail addresses, or other non-physical contact details would not be an acceptable replacement for the producer's full address. There should also be a best before/use by date and a weight marking. It is also recommended that details of allergens if present are included on the label. Food is sold pre-packed for direct sale where it is sold at the premises where it was packed or from a stall by the person who packed the food.

Compositional standards and additional labelling

Some foods must meet minimum standards for their composition and require extra information.

- Jam, jelly and marmalade
- The Jam and Similar Product (Scotland) Regulations 2004 give reserved descriptions which form the 'name of the food' for jam, jelly and marmalade and set minimum amounts of fruit. You should contact the Council's Food, Health and Safety Team for more details.
- The amount of fruit and sugar must be declared on the label **where the food is pre-packed** –
'prepared with Xg of fruit per 100g' and 'total sugar content Yg per 100g'. The total sugar is the sugar from the fruit and that added in cooking. You may need a refractometer to check this.
- Any residual sulphur dioxide preservative above 10mg/kg must also be declared in the ingredients list.
- A jam with less than 65% sugar will require storage in the fridge after opening.

Weight and Volume Marking

A metric weight or volume must be indicated on each pack and this must be in the same field of vision as the name of the food and any use by or best before date. The quantity shown must be the net weight i.e. the weight of the food without the weight of the container, lid and label. An imperial equivalent can also be given but the metric indication must be more prominent and for most packs must be at least 4mm high. Jam, jelly and marmalade are no longer required in prescribed quantities. Containers can be filled either to the minimum system where each pack is at or above the declared weight, or to the average weight. For minimum weight each container must be individually weighed on a scale that has been tested and approved for trade use. If you wish to pack for average weight you will need to contact the trading standards team for further information at placetradingstandards@scotborders.gov.uk

Full details on how to comply with labelling requirements can be found in the Food Information (Scotland) Regulations 2014.

For further help

http://www.food.gov.uk/sites/default/files/multimedia/pdfs/jamregguid_rev.pdf

For advice on food hygiene and safety, contact the Food, Health and Safety team at Scottish Borders Council on:

Tel: 01835 824000

Email: placehealth@scotborders.gov.uk

Process flow diagram for making jam

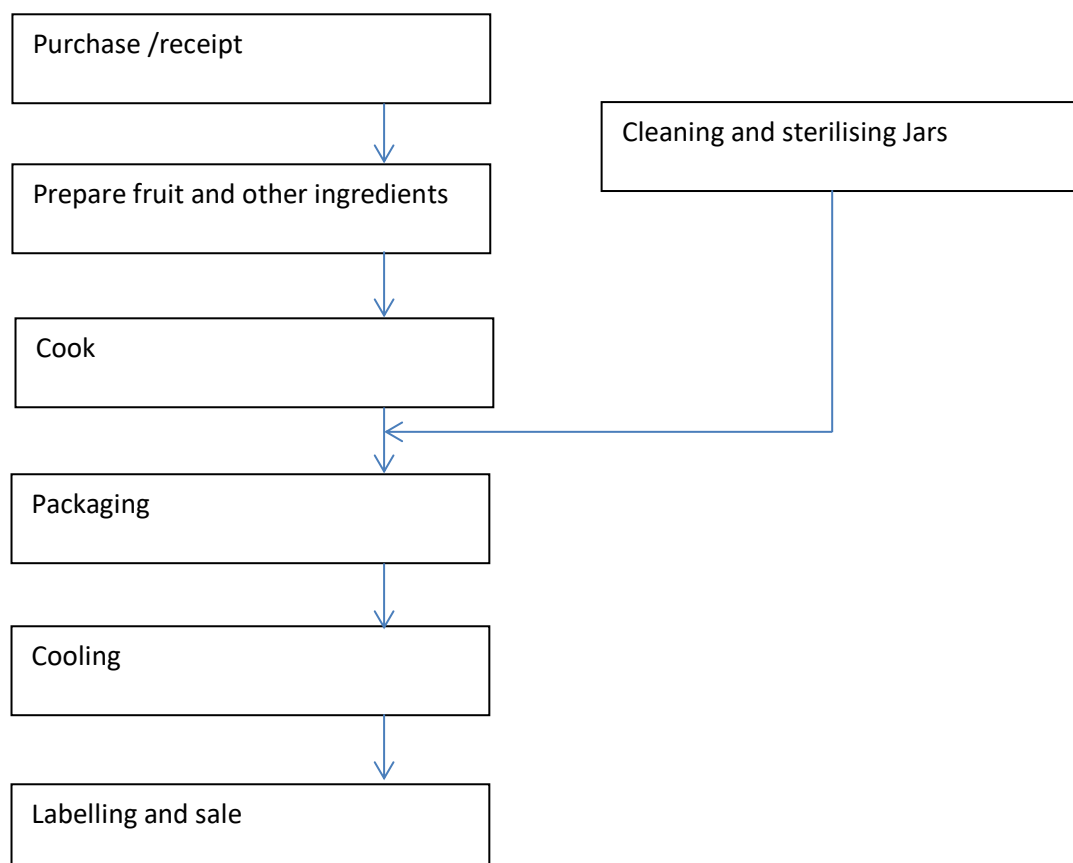


Table 2: Hazard ID and analysis/ Critical Control Point determination for making jam - CCPs identified - none

Process Step	Input	Hazard (with justification)	Q1. Is there a Regulatory limit or Operator- defined limit? Yes: Go to Q2. No: Step is not a CCP. Consider need for other control measures in GOP.	Q2. Is a control measure(s) essential to achieve the limit from Q1? Yes: Step is a CCP. No: Step is not a CCP. Consider need for other control measures in GOP	Impact of process step on existing hazards / Introduction of new hazards	Control measures to prevent / minimise or eliminate hazard
1. Purchase /receipt	Fresh fruit Sugar Water Jars		No	No	Good Operating Practice (GOP) by food handlers. Chance of foreign matter in fruit if not visually checked Growth of harmful bacteria if fruit not washed appropriately.	Reputable suppliers good operating practices

					Chance of foreign matter in sugar if not visually checked	Approved Supplier good operating practices
					Use of contaminated water	Use potable water
					Damaged jars - potential for glass shards in jam	Check jars for cracks, chips etc. discard if damaged
2. Prepare ingredients			No	No	GOP	Wash fruit and check for foreign matter Check Sugar for foreign matter
3. Cook			No	No	Proper cooking to set point reduces harmful bacteria.	GOP when handling food
4. Package	Glass jars & seals	Contaminated jars Cracked jars	No	No	Growth of yeasts & moulds if food not handled or stored appropriately.	Sterilise jars prior to filling GOP when handling food
5. Labelling & sale		Allergens	No	No	Appropriate labelling of allergens	Stock is rotated appropriately

Batch control document

Type of jam	Production date	Best Before date batch code	Ingredients	Set temperature °C	N° jars produced	Jars sterilized according to procedure	Comments

Complete the following House Rules

Personal Hygiene

Describe	<ul style="list-style-type: none"> • Control Measures and Critical Control Limits (where applicable) • Frequency
Rules on Effective Hand Washing Technique including how and when you wash your hands	
Personal Cleanliness e.g. Hair tied back or covered Cuts and sores covered with waterproof dressing Minimum jewellery worn	
Protective Clothing e.g. clean apron which is changed when it becomes contaminated by raw foods	
Rules on : > Exclusion/return to Work	Any food handlers who have had diarrhoea, stomach upset or vomiting must not return to work until they have been free of symptoms for at least 48 hrs

Completed by.....

Date.....

Cleaning

Items, areas to be cleaned and examples	Frequency of Cleaning	Method of Cleaning	Chemical, Dilution and Contact Time
Moveable equipment, utensils: <ul style="list-style-type: none"> • <u>all</u> chopping boards, • tongs/ spatulas • serving spoons • trays • containers 			
Non-food contact items/equipment <ul style="list-style-type: none"> • work surfaces • wash hand basin • taps • door handles 			
Fridge and freezer			
Oven and microwave oven			
Dry storage area			
Floors			
Extraction Fans			
Food waste containers and refuse waste bins/area			
Cloths and work clothes			

Completed by.....

Date.....

Allergens

When taking orders from your customers, ask if they have any issues relating to allergens. It is important that you are aware of the composition of the foods you make and sell to enable you to let your customers with allergies know that you are allergy-aware and be able to give advice on which foods they should avoid. This can be done by identifying the allergens in the ingredients you use to make the food, and completing the allergen identification table below.

Allergen	Foods used which contain this allergen
Cereals containing Gluten e.g. wheat, rye, barley, oats	Bread, pasta, cakes, pastry, sauces, soups, batter, stock cubes, breadcrumbs, semolina, couscous, some meat products.
Celery and Celeriac e.g. stalks, seeds and leaves	Salads, soups, celery salt, some meat products.
Eggs	Cakes, sauces, pasta, mayonnaise, some meat products, glazed products.
Fish, Crustaceans and Molluscs e.g. all fish, prawns, lobster, crab, clams, langoustines, mussels, oysters	Some salad dressings, fish extracts, oils and paste, Soy and Worcestershire sauces, relishes.
Milk	Milk powder, yoghurt, butter, cheese, cream, ghee, foods glazed with milk, ice cream
Mustard	Mustard paste, seeds, leaves, flour, powder and liquid mustard, salad dressings, marinades, soups, sauces, curries, some meat products.
Peanuts	Arachis oil, peanut butter, flour, satay sauce, refined peanut oil.
Other Nuts e.g. walnuts, cashews, pecan, Brazil, pistachio, macadamia, Queensland nuts	In sauces, desserts, bread, crackers, ice cream, praline (hazelnut), nut butters, essences and oils, marzipan and frangipane (almond), pesto, nut salad dressings.
Sesame Seeds	Oil or paste, tahini, houmous, halva, furikake, Gomashio, bread.
Soya e.g. flour, tofu or beancurd, textured soya protein, soy sauce, edamame beans.	Some ice cream, sauces, desserts, meat products, vegetarian products.
Sulphur Dioxide and Sulphites	Some meat products, stock cubes, bouillon mix, fruit juice drinks, dried fruit/vegetables, wine, beer, cider.
Lupin Seeds and Flour	Some types of bread and pastries.

Using this information and the information on the labels of the ingredients that you use complete the Allergen Identification table below. Don't forget to review the table when you make new products or change the ingredients that you use

Allergen Identification Table

Food	Cereals containing Gluten	Celery	Eggs	Crustaceans	Molluscs	Fish	Milk	Mustard	Peanuts	Other Nuts	Sesame Seeds	Soya	Sulphur Dioxide	Lupin
<i>e.g. chocolate éclair</i>	wheat ✓		✓				✓							
<i>e.g. coffee and walnut cake</i>	wheat ✓		✓							✓				

