

# **PRIMARY AUTHORITY**

## **COFFEE SHOP PANEL GUIDANCE**

**Introducing the STOP! THINK method – a practical approach designed to help coffee shop operators improve how they manage food hypersensitivities when preparing both hot and cold beverages.**

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## 1. Introduction

- 1.1. The Coffee Shop PA panel was established in February 2024 and is facilitated by the Department of Business and Trade.
- 1.2. The panel brings together regulators from Environmental Health and Trading Standards disciplines and largely comprises of professionals who represent large and/or SME organisations under the Primary Authority scheme in England and Wales; panel members meet quarterly to discuss a range of regulatory matters which are associated with coffee shop operating models, including allergen management.
- 1.3. The coffee shop trade is a thriving industry which is valued in the UK to be worth £6.3bn (2024). The industry strategically permeates innovation to remain competitive, which sees customers gravitate towards the appeal of unparalleled coffee quality, non-traditional drink segments, i.e. (plant-based options), seasonal drinks, influencer marketing, and the unlimited choice of drink customisations; however, as new businesses emerge and operating models continue to diversify, the risk to consumers living with food hypersensitivities is increasing.
- 1.4. Coffee shops are increasingly popular with young people, and research suggests that they are more likely to engage in risk-taking behaviours, especially when experiencing stress or anxiety, such as peer pressure or a lack of sufficient information to aid decision-making.
- 1.5. The Coffee Shop PA panel guidance has been established following consultation with panel members. The STOP! THINK Method has been designed to provide operators with a universal approach to help improve the industries existing approach to allergen management when preparing hot and cold beverages on-site for consumers living with hypersensitivities.
- 1.6. **Food hypersensitivity** refers to a range of adverse reactions that occur when the body's immune system responds abnormally to certain foods. It includes both **food allergies** and **food intolerances**, but they are different in nature:
  - **Food allergies** are immune system reactions where the body mistakenly identifies a harmless food protein as a threat, triggering an allergic response. Symptoms can range from mild (e.g., hives or swelling) to severe (e.g., anaphylaxis, a life-threatening reaction).
  - **Food intolerances** are non-immune system-related responses to foods, such as difficulty digesting certain ingredients (like lactose) or

sensitivities to additives or preservatives. Symptoms are typically gastrointestinal, such as bloating or stomach pain.

Both conditions can pose health risks and require careful management, especially in food service environments, to prevent cross-contact with allergens and to inform consumers accurately about potential risks.

- **Coeliac Disease:** This is an autoimmune disorder where the ingestion of **gluten** (a protein found in wheat, barley, and rye) triggers an immune response that damages the lining of the small intestine. It is a form of food hypersensitivity because the immune system reacts to gluten as if it were a harmful substance. It is not an allergy but an autoimmune disease.

- 1.7. The STOP! THINK Method is a backronym to help food handlers remember the key control measures which are required to transparently inform consumers of any mandated food allergens and associated food handling risks, and to place emphasis on the control measures which are needed to safely handle foods which have been ordered by consumers with a food allergy, intolerance or autoimmune disorder.
  - Talk
  - Hygiene
  - Integrity
  - Notify
  - Knowledge
- 1.8. The guidance has been designed to focus primarily on the preparation of beverages using the STOP! THINK Method as the panel have unanimously agreed that this area of focus is widely considered to present the most ambiguity.
- 1.9. Panel members have provided feedback from a regulatory perspective. However, those representing organisations under the Primary Authority scheme have consulted with relevant stakeholders within their organisations to gather feedback on the guidance, ensuring a balance between regulatory and operational requirements.
- 1.10. The guidance is not exhaustive as it needs to be workable and provide food businesses operators with good practice examples which are written and illustrated clearly.

1.11. Coffee shop operators offer a diverse range of beverages; however, these can be grouped into the 3 key categories; hot prepared beverages, cold prepared beverages, prepacked drinks.

## **2. Intended Audience**

- 2.1. The guidance is designed to support businesses operating a coffee shop model and can be adopted by businesses of any size. It is intended for food business operators, food safety managers, or other similarly qualified individuals.
- 2.2. The guidance has also been written to help regulators better understand the complexities and limitations of the coffee shop operating model, particularly those that prevent operators from being able to safely prepare 'free-from' beverages on-site.

## **3. Scope of Guidance**

- 3.1. The purpose of this guidance is to provide businesses with practical, value-driven methods to:

Minimise the risk of cross-contact with allergens.

Improve communication between businesses and consumers with hypersensitivities, supporting better decision-making.

Offer a simple, inclusive, and effective approach for systematically improving beverage handling, recognised widely across the industry to improve the lives of those living with food hypersensitivities.

#### **4. Free-From Claims**

- 4.1. Panel members are committed to supporting businesses to find pragmatic solutions to regulatory challenges to promote inclusive and safer environments. Members recognise the importance of allergen management and the need to harmonise how businesses communicate and prepare food stuffs wherever practicable; however, due to restrictions associated with time and space, the use of shared equipment, and product customisation, it is not practicable or safe for operators to provide consumers with 'free from' products which are prepared on-site.
- 4.2. The term free-from has been defined by the Food Standards Agency as a '*guarantee that the food is suitable for all with an allergy or intolerance*', therefore, food business operators must adopt and apply strict control measures to ensure free-from claims are proportionate to product safety.

#### **5. STOP! THINK Method**

- 5.1. The STOP! THINK Method has been designed to help businesses apply a pragmatic approach to handling orders which have been placed by consumers with hypersensitivities.
- 5.2. The method should be used by businesses to encourage servers, food handlers and baristas to take a pause moment, before applying the principles of the THINK Method to help employees navigate the practical steps of taking orders and handling prepared in-store beverages for consumers with a declared hypersensitivity.

## 6. TALK

- 6.1. The interaction between consumers and businesses is crucial to ensuring that consumers receive up-to-date and accurate information on how allergens are managed, enabling them to make informed decisions before placing an order.
- 6.2. Dialogue between consumers and businesses should be transparent and transactional when discussing allergen requirements. Businesses should not expect consumers to assume how allergens are managed, nor should consumers expect businesses to provide advice on risks related to specific hypersensitivities.
- 6.3. To promote effective dialogue, businesses should adopt the following:
  - 6.3.1. Display appropriate signage at all service points to encourage consumers to discuss food allergies. Signage should be placed prominently at in-person order points, drive-thru windows, and self-service kiosks. Both physical and digital signage should be bold, clear, and easily visible, prompting consumers to inform staff about any food hypersensitivities.
  - 6.3.2. Ensure that consumers who have declared a hypersensitivity are informed of any risks of unintentional cross-contact. Employees should be able to clearly inform the key risks of cross contact either verbally or by directing to the instore signage where the use of shared equipment is mentioned.
  - 6.3.3. If in-store prepared beverages are unsuitable for consumers, businesses should be able to suggest suitable prepacked beverage or food alternatives.
  - 6.3.4. Ensure that all in-store prepared beverages, including any customisations, have up to date allergen information and ingredients which can be reviewed by the consumer in a timely manner; this will ensure that mandated and non-mandated allergens can be reviewed by the consumer.
  - 6.3.5. Where technology is provided as the primary source for allergen information to be viewed, businesses should ensure that a secondary source is available
  - 6.3.6. In situations where food allergen information cannot be temporarily provided – such as during technical interruptions – businesses are advised to inform customers with declared food allergies that, due to a temporary issue, it is not safe to serve them at this time.

6.3.7. All allergen information should be under strict version control and should only be updated/amended by competent and authorised personnel.

6.3.8. Where possible, put in place allergen champions who are competent to deal with any perplexing enquiries from employees and consumers.

## 7. HYGIENE

- 7.1. Coffee shops can be busy working environments, and it can be challenging for baristas to wash their hands between every order. However, the unintentional cross-contact of allergen proteins can occur when food handlers do not wash their hands regularly and when appropriate hand washing techniques are not being followed.
  - 7.1.1. Food business operators should have a procedure in place which aligns with their personal hygiene and/or hand hygiene policy and promotes effective hand washing; procedures should illustrate appropriate hand washing techniques.
  - 7.1.2. While hand washing should be carried out regularly in accordance with the food business operator's prerequisite programme, staff must be specifically instructed to wash their hands before handling any part of an order for a customer with a declared hypersensitivity. If there is any accidental or suspected risk of cross-contact with the allergen of concern during preparation, hand washing must be repeated immediately to prevent contamination.
  - 7.1.3. Before preparing any order for a customer with a declared food hypersensitivity, employees must ensure that their clothing and PPE (e.g., hats, aprons, etc.) are clean and in good condition. A new apron is *not* required; however, uniforms should be free from excessive soiling or visible stains to help minimise the risk of cross-contact.
  - 7.1.4. If equipment hygiene is not effectively managed, this can contribute to the risk of cross-contact.
  - 7.1.5. Coffee shop operators should adopt precautionary allergen labelling (PAL) to advise customers of the risks associated with cross-contact due to the use of shared equipment, handling methods.
- 7.2. Operators should only apply Precautionary Allergen Labelling (PAL) after conducting a thorough risk analysis to determine where cross-contact risks can and cannot be effectively controlled. Some equipment, such as dishwashers and steam arms, present practical challenges due to the intricacy of their components, which limits the ability to clean them effectively and fully remove allergen proteins.

7.3. Plant-based drinks are becoming increasingly popular among both businesses and consumers due to their associations with sustainability and lifestyle choices. As demand for these products grows, it is essential for businesses to implement appropriate controls to minimise the risk of cross-contact with allergens, so far as reasonably practicable.

**7.3.1.** Where dairy alternatives are used and where possible, operators should designate separate, easily identifiable equipment – such as jugs, blenders, and thermometers – for each specific type of dairy alternative (e.g., soy, almond, coconut, oat). This equipment should be permanently assigned and not used interchangeably. This helps to reduce the risk of allergen cross-contact.

**It's important to note that segregated equipment is only effective when supported by robust and consistent cleaning controls.**

**7.3.2.** Due to busy working environments and limitations of space, it is acceptable for coffee shop operators to store general and designated equipment in the same vicinity; however, wherever possible, i.e. where space allows, operators should implement systems for segregation. It is also acceptable for operators to use designated equipment more than once; however, only when a customer has advised their choice is a preference and not a food allergy or intolerance.

**7.3.3.** To minimise the risk of cross-contact, operators should ensure that only clean, unused equipment — such as jugs, blenders, and other utensils used for drink preparation — is used when a customer has informed the business of a food hypersensitivity.

Where possible, equipment should be cleaned using a 2-stage cleaning process or a dishwasher. Dishwashers are generally effective at removing allergenic residues and are a valuable part of routine cleaning practices. However, to support robust allergen management, they should still be included in the risk assessment that underpins the use of Precautionary Allergen Labelling (PAL), particularly when used to clean shared equipment. In high-use environments where multiple items are washed and stored together, it may not be possible to fully guarantee the prevention of cross-contact.

**7.3.4.** Steam arms are difficult to clean because they are exposed to milk and steam, both of which can leave residues. Milk proteins can stick to the inside of the steam arm, creating a film that hardens when exposed to heat. This film is tough to remove without thorough cleaning. Additionally, the steam arm's narrow, often hard-to-reach nozzle makes it challenging to fully clean with regular cloths or brushes. To minimise the risk of unintentional cross-

contact between use, baristas should follow these steps to clean the steam arm before preparing a drink for a consumer with a declared hypersensitivity.

- 7.3.5. When a customer declares a food allergy or intolerance to an ingredient commonly handled at the coffee machine – such as cow's milk, soya, almond, oat, or other dairy alternatives – baristas must take specific steps to prevent allergen cross-contact.
- 7.3.6. After purging the steam wand, it must be wiped immediately with a clean, disposable cloth and fresh sanitiser that meets BS EN 1276 or BS EN 13697 standards. Sanitiser that may be contaminated – such as pre-diluted solutions from shared containers – must not be used. A new, unused cloth is essential to prevent allergen cross-contact.

## 8. INTEGRITY

- 8.1. It is crucial to maintain the integrity of the product throughout the entire handling process, from start to finish, to prevent the risk of cross-contact. Operators should ensure the following controls are in place.
  - 8.1.1. Operators should implement a clear system to manage the movement of in-store prepared beverages between workstations, ensuring safe handling by employees. This can be achieved through effective communication and/or beverage labelling.
  - 8.1.2. Beverages should be clearly identifiable and distinguishable from other beverages, i.e. colour coded lids, emphasised (bold) ALLERGEN labelling etc. A simple and consistent system – such as permanent colour-coding or clear labelling – should be used to identify equipment by dairy alternative type. The system should be practical for staff to follow and easy for managers to oversee across all sites.
- Note:** It is not expected that shared equipment, such as the coffee machine itself, be duplicated for each dairy alternative, as this would not be practicable. The focus of control should be on the utensils and tools that come into direct contact with the milk alternative products.
- 8.1.3. Orders should be confirmed with customers, and beverages should be handed directly to them.

## 9. NOTIFICATION

- 9.1. Employees should be confident in their ability to respond appropriately and escalate a medical emergency in the event of anaphylaxis
  - 9.1.1. Employees should promptly report any incidents or near misses to the business and record them using the company's incident reporting system.
  - 9.1.2. Employees should notify customers before making any changes to an existing order, including when approved substitutions need to be used.
  - 9.1.3. Operators should ensure that systems are robust enough to identify any customisable drink specifications that contain food allergens the customer wishes to avoid, such as seasonal toppings, whipped cream, etc.
  - 9.1.4. If any part of a beverage is prepared incorrectly – particularly when a declared allergen or intolerance is involved – it must be safely discarded and fully remade following the agreed hygiene and allergen control procedures. The incident should be recorded as a near miss in accordance with site procedures to support ongoing food safety monitoring and training.
  - 9.1.5. Businesses, especially multi-chain operators, should allow flexibility in service times for employees handling orders from customers with a declared food hypersensitivity.

## 10. KNOWLEDGE

- 10.1. The proficiency of knowledge is what underpins the STOP! THINK Method.
- 10.2. It is crucial that operators ensure that servers, food handlers and baristas have received the appropriate allergen training which reflects their roles and responsibilities.
- 10.2.1. Businesses must ensure that baristas and all relevant food handlers receive appropriate allergen training before they handle orders involving declared food allergies or intolerances. This training must go beyond basic awareness and include key learning to:
- 10.2.2. Upskill staff on the principles and purpose of Precautionary Allergen Labelling (PAL)—including when and why it is used.
- 10.2.3. Contextualise PAL in day-to-day operations, helping staff understand how it relates to the risks of cross-contact, especially in environments where multiple allergens (e.g., dairy, soya, nuts) are regularly handled.
- 10.2.4. Develop confidence in decision-making and communication with customers around allergen risk and safe preparation practices.
- 10.2.5. Businesses are encouraged to use tools such as [AllergyPAL](#) to support training. AllergyPAL provides practical, real-world scenarios that can help reinforce learning and guide safer working practices.  
Effective training ensures that staff not only know *what* to do, but *why* it's important – helping protect both customers and the business.
- 10.2.6. Trainee baristas must not prepare any order for a customer who has declared a food allergy or intolerance until they have been formally signed off as competent in allergen handling and cross-contact prevention procedures.  
This ensures the highest level of safety and compliance with allergen control protocols.
- 10.2.7. Operators should ensure employees are trained on how to deal with medical emergencies associated with food allergies.
- 10.2.8. Employees should be trained to report incidents promptly and accurately, as well as identify and report near misses. This is critical for the ongoing development and improvement of existing systems.

10.2.9. Operators should include the STOP! THINK Method as part of their existing allergen training.

10.3. Multi-site operators should carry out knowledge checks as part of verification to establish that employees understand how to apply the STOP! THINK Method.

10.3.1 Operators should display the STOP! THINK Method poster for operational reference, and the branded labelling should be positioned in a customer facing area to advise consumers they have opted into the scheme.

