This quick guide provides a summary of food safety and labelling advice 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 your local authority for more information.

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.food.gov.uk/multimedia/pdfs/publication/foodlawinspec0310.pdf

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 Chartered Institute of Environmental Health's Level 2 Award in Food Safety. More information on food hygiene courses can be found by contacting us or your local college.

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 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 at 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)

The Food Standards Agency has developed Safer Food, Better Business for small catering and retail businesses to help businesses comply with food hygiene regulations. Many small food businesses will be able to have simple procedures and simple records. More information can be found at
http://www.food.gov.uk/foodindustry/regulation/hygleg/hyglegresources/sfbb/

The European Commission has also provided a guidance document for businesses regarding HACCP at
http://ec.europa.eu/food/food/biosafety/hygienelegislation/guidance_doc_haccp_en.pdf

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 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 for bacteria to survive and grow, and this can potentially be added in the form of vegetables, 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.

What should I do to control the hazards?

For all products

- Wash your hands before preparing or handling food.
- Ensure chopping boards, pans and utensils are clean 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. The jars or bottles must be fully dry before use.
- 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

- Then making 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 use 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

Full details on how to comply with labelling requirements can be found in the Food Labelling Regulations 1996. Changes that will amend the general labelling requirements are being developed. Please check with Kent Trading Standards to see how the changes may affect your business.

If you are 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 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 a 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 ingredient that has been irradiated or genetically modified this must be declared.

Food sold pre-packed for direct sale does not require full labelling, only a declaration of the category name of any additives (antioxidants, artificial sweeteners, colours, flavour enhancers, flavourings and preservatives) and whether any ingredients have been irradiated or genetically modified.

Food is sold pre-packed for direct sale where it is sold at the premises where it was packed or from a stall owned 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 Regulations 2003 give reserved descriptions which form the 'name of the food' for jam, jelly and marmalade and set minimum amounts of fruit. You should contact your local trading standards office 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.

Olive Oils

There are marketing standards with additional labelling requirements for the different types of olive oils. You should contact your local trading standards office for more details.

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 to be packed 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 your local trading standards office for further information.

For further help

For advice on food hygiene and safety, contact Canterbury City Council on:
Tel (01227) 862222 email food@canterbury.gov.uk

Details of food hygiene courses can be found at:
http://www.canterbury.gov.uk/main.cfm?objectid=815

The Chartered Institute of Environmental Health publishes details of local training providers on its website http://www.cieh-coursefinder.com/

For information on food labelling or composition contact Trading Standards on:
Tel (01233) 898825 email trading.standardseast@kent.gov.uk

Food safety advice can be found by visiting the Food Standards Agency website www.food.gov.uk

Defra contact details for General Food Labelling requirements
http://www.defra.gov.uk/food-farm/food/labelling/

Jams and Marmalades http://www.defra.gov.uk/food-farm/food/standards/

Defra Helpline 08459 33 55 77 email foodpolicyunit@defra.gsi.gov.uk

This guidance is not a legal interpretation of the law; this can only be decided by the courts. An accredited microbiological laboratory must be used to reliably determine the shelf life of foods.