

SB-68 CALIFORNIA ALLERGEN DISCLOSURES COMPLIANCE CHECKLIST

**DOES THE LAW APPLY TO YOU? ARE YOUR DISCLOSURES COMPLIANT?
USE THIS LIST TO FIND OUT.**





DOES THE LAW APPLY TO YOUR BUSINESS?

- Your business operates 20+ sites under the same brand with a similar menu.
- Your business sells food directly to customers (restaurant, café, takeaway, delivery, ghost kitchen).
- If franchised or licensed, confirm whether your business counts towards the 20-site threshold.
- If you operate both retail and foodservice, allergen disclosure requirements have been reviewed separately for each type (e.g., packaged food vs. prepared meals).
- Your business does not fall under the following exemptions:
 - Compact mobile food operations
 - Temporary or non-permanent food facilities
 - Businesses selling only pre-packaged food with federal allergen labels

IDENTIFYING ALLERGENS

- Every menu item has been reviewed for the 9 major allergens:

<input type="checkbox"/> Milk	<input type="checkbox"/> Shellfish	<input type="checkbox"/> Peanuts
<input type="checkbox"/> Eggs	<input type="checkbox"/> Tree nuts	<input type="checkbox"/> Soybeans
<input type="checkbox"/> Fish	<input type="checkbox"/> Wheat	<input type="checkbox"/> Sesame
- Protein-derived ingredients have been checked (*e.g. casein, whey, soy sauce*).
- Highly refined oils (soy/peanut) and FDA-exempted ingredients have been excluded.
- Multi-component items (*e.g. meal deals, build-your-own*) show allergens for all components.
- Supplier allergen data is validated against labels at each delivery (not just onboarding).
- A change log is maintained with date, item, allergen change, who approved, and reason.
- A full version history of allergen records is maintained and accessible for audits.

FOOD DATA & ALLERGEN MANAGEMENT PROCESSES

- A documented allergen data flow exists
(supplier → recipe → menu → customer disclosures).
- Automated or manual systems detect mismatches
(e.g. supplier spec has “milk” in bold but menu does not).
- Recipe audits are scheduled regularly and carried out.
- Internal mock audits are conducted quarterly (including menus, apps, and staff knowledge).
- The staff training programme includes:
 - Front-of-house: handling customer queries, escalation procedures.
 - Kitchen staff: recipe adherence, cross-contact prevention.
 - Delivery staff: communicating allergen disclaimers.
- Training records are kept, and retraining is scheduled annually or after incidents or changes.

ALLERGEN DISCLOSURES - HOW IS THE INFORMATION PROVIDED?

- Each item on the menu has a clear allergen statement (not just a symbol).
- Digital disclosures are always accessible:
 - Digital screens or iPads are always on.
 - QR codes function across devices.
 - Information is retrievable without internet (with a backup copy available).
- Written alternatives (e.g. allergen menu, grid, or booklet) are available on request.
- Allergen names are consumer-friendly (e.g. “milk,” not “caseinate”).
- Pictograms (if used) are standardised and applied consistently across print, app, and web.
- Accessibility compliance is in place:
 - Digital menus are screen-reader compatible.
 - Colour contrast and font size are tested.
 - Staff are trained to read allergen info aloud if requested.
- Allergen information is consistent across languages, platforms, and third-party delivery apps.



AUDIT READINESS

- An inspector can easily verify allergen information across menus, apps, and written alternatives.
- Evidence is ready for inspection, including:
 - Supplier specifications and allergen labels
 - Allergen change logs/version history
 - Staff training records
 - Internal audit results
- A documented policy exists for correcting allergen errors or mismatches.
- A clear written SOP exists for answering customer allergen queries, including escalation.
- Records show proactive monitoring, not just reactive fixes.

CONTACT US



http://

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info@nutritics.com