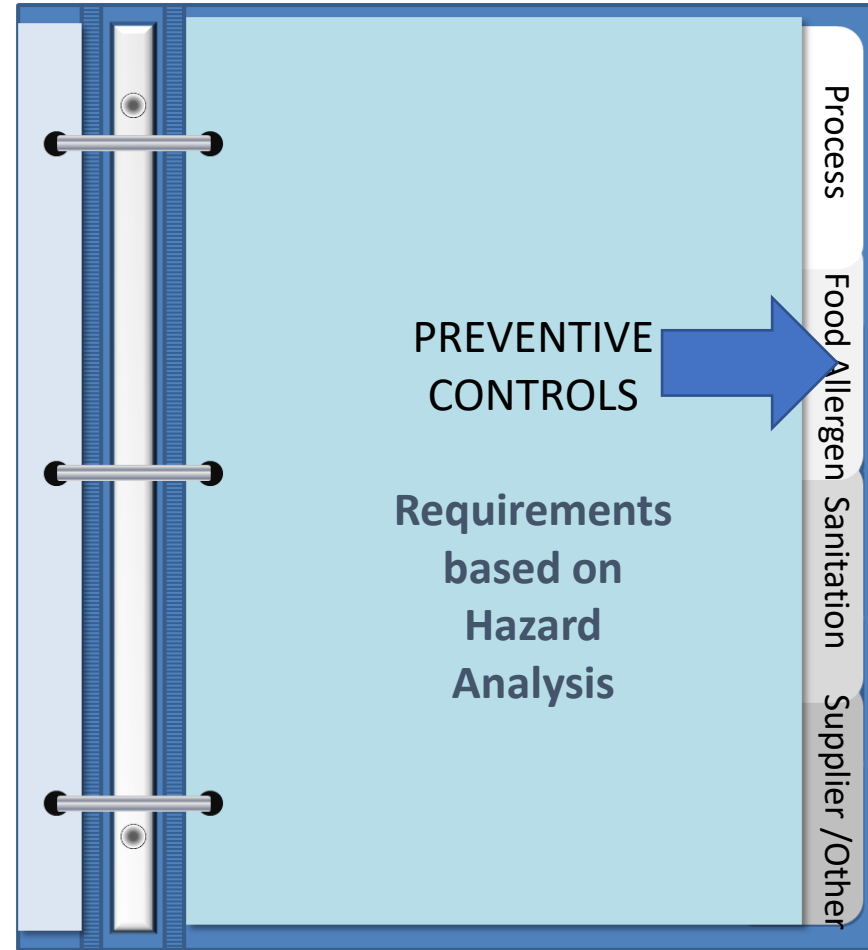


# Allergen Control



# Food Allergen Preventive Controls Objectives

- Allergen preventive controls link to hazard analysis
- Required food allergen preventive controls
  - Allergen cross-contact prevention
  - Allergen label review
- Allergen preventive controls options



# FALCPA\* Required Food Allergen Labeling

- Milk
- Egg
- Peanut
- Tree nuts (species specific)
- Fish (species specific)
- Crustacean shellfish (species specific)
- Wheat
- Soy

\* Food Allergen Labeling and Consumer Protection Act



Photo Sources: Microsoft Clip Art and KMJ Swanson (soybeans)

# Allergen Preventive Controls Requirements

1. Preventing allergen cross-contact
    - Clean shared equipment – potential sanitation controls
    - Properly manage rework
    - Avoid in-process or post-process allergen cross-contact
  2. Accurate allergen labeling of finished food
    - Ensure labels are correct – potential supply-chain program
    - Ensure the correct label or package is used
- Human error can be involved – training is essential!



## Allergen Cross-contact Prevention Considerations

- Equipment cleaning and sanitary design
- Scheduling
- Manufacturing and engineering controls
- Allergenic ingredient control
- Rework management
- Personnel practices
- Employee training relevant to the above

# Verification of Allergen Cleaning

- Visually clean
  - Minimum requirement
  - No residue, film or sheen
- Optional tests
  - Non-specific tests, e.g., ATP and protein
    - May not be sensitive enough to detect some allergens
  - Allergen test kits
    - Follow manufacturer's instructions!
  - Complex tests
    - Special situations

Run ordering

PLANT NAME	ISSUE DATE	PAGE
ADDRESS	SUPERSEDES	PRODUCT CODE

**Form Name: Production Line Food Allergen Assessment**

Product Name	Production Line	Intentional Allergens							
		Egg	Milk	Soy	Wheat	Tree Nut (market name)	Peanut	Fish (market name)	Shellfish (market name)

Scheduling Implications:

Allergen Cleaning Implications: (Required)



# Example Process Order Monitoring Record

<p><b>Run Order Monitoring Record</b></p> <p><b>Hazard:</b> Allergen cross-contact from other products handled at this step; e.g., Cheese Omelet Biscuit.</p> <p>Run the Plain and/or Cheese Omelet in the beginning of the shift and the Cheese Omelet Biscuit at the end of the shift to reduce the potential for allergen cross-contact. A full allergen clean is required <b>AFTER</b> production of Cheese Omelet Biscuit because it contains a unique allergen – wheat.</p>					
Product Name	Date	Start Time	End Time	Allergen Clean After run (Yes/No)	Initials for allergen clean
Verification Signature				Date:	

# Allergenic Ingredient Control

- Develop a master list of allergenic ingredients used in the facility
  - Letters of guarantee from suppliers on the presence or absence of allergenic ingredients
  - Accessibility of master list at receiving dock
  - Use common names of allergens
- Apply careful handling at receiving to avoid allergen cross-contact
- Identify allergens with icons

# Receipt of Incoming Goods

- Review labels of incoming raw materials
- Include allergen check as a prerequisite program or in allergen preventive control for deliveries, depending on risk
- Color coding and pallet labeling useful
- Separate each type of tree nut, peanut, fish or crustacean shellfish species
- Consider separate area for each allergen
- Consider dedicated transportation vehicles for different allergens, depending on risk

# Allergen Cross-contact Prevention During Processing

- Requires segregation of unique allergenic material, e.g.:
  - Weigh powders containing unique allergens in a different area
  - Cover totes containing allergen-containing ingredients during transfer
  - Control ventilation over lines where protein powders are dumped
  - Consider dedicated tools and equipment
  - Proper use of containers that previously held food allergens

# Allergen Labeling Considerations

- Label accuracy
  - Accurate printing of allergen ingredients on the label
  - The right label on the package
- Supply-chain program
  - Ingredients
  - Labels

# Product Labeling and Packaging

- Proper package labeling protects:
  - Consumers
    - Only way for them to know the allergen is in the product
  - Companies
    - Product recalls
    - Regulatory inquiry
    - Potential liability
- Preventive controls for food labels and packages are as important as other food allergen management techniques!

# Allergen Label Verification Receipt

PRODUCT: Ice Creams		PAGE 1 of X
PLANT NAME: I.B. Frozen Company		ISSUE DATE
ADDRESS: 360 Culinary Circle, Mytown, USA		SUPERSEDES
<b>Allergen Label Verification Upon Receipt and Application to Product</b>		
Product	Allergen Statement	Label Number
French Vanilla	Contains: Egg, Milk	P 082015
Peanut Butter Cookie	Contains: Egg, Milk, Peanuts, Wheat	C 082015
Chocolate	Contains: Milk	B 082015

# “May Contain” Labeling

- “May Contain” or similar labeling is NOT a substitute for appropriate GMPs
- Carefully consider label implications for ingredients with precautionary labels (e.g., “May Contain”)





PRODUCT: French Vanilla Ice Cream

PAGE 1 of X

PLANT NAME: I.B. Frozen Company

ISSUE DATE

mm/dd/yy

ADDRESS: 360 Culinary Circle, Mytown, USA

SUPERSEDES

mm/dd/yy

Allergen Control	Hazard(s)	Criterion	Monitoring				Corrective Action	Verification	Records
			What	How	Frequency	Who			
Receiving – labels	Chemical – Milk, Egg Allergen	“Contains: Egg, Milk” statement below ingredient statement	Incoming new labels	Evaluation Checklist for all newly received labels	Receipt of every new shipment of labels	QA trained staff	Reject label shipment	Records reviewed and signed by PCQI or designee within 7 working days.	Label Evaluation Checklist – Receiving

PRODUCT: French Vanilla Ice Cream

PAGE 1 of X

PLANT NAME: I.B. Frozen Company

ISSUE DATE

mm/dd/yy

ADDRESS: 360 Culinary Circle, Mytown, USA

SUPERSEDES

mm/dd/yy

Allergen Control	Hazard(s)	Criterion	Monitoring				Corrective Action	Verification	Records
			What	How	Frequency	Who			
Filler (Pints) weighed and labeled	Chemical – Egg, Milk Allergen	“Contains: Egg, Milk” statement below ingredient statement	Placing of Labels on product package	Check labels versus product	At start of shift and change of lot numbers	Packaging operator	Place product on hold, re-label product with correct label Determine cause of wrong label and correct. Document corrective action.	Records reviewed and signed by PCQI or designee within 7 working days.	Packaging operator daily log

# Sanitation to prevent cross-contact?

- Will be discussed in sanitation preventive control program