

# ALLERGEN CONTROL PLAN

*An allergen control plan is about protecting the health of consumers with food allergies, and protecting the financial health and reputation of your company.*

With an estimated 1.2 million Canadians affected by food allergies and an increase in the number of recalls due to unidentified allergens, allergen awareness is more prevalent than ever before.

Health Canada recently amended the list of priority allergens and now identifies a total of 10 including:

- |              |           |            |              |
|--------------|-----------|------------|--------------|
| 1. Eggs      | 2. Milk   | 3. Mustard | 4. Peanuts   |
| 5. Seafood   | 6. Sesame | 7. Soy     | 8. Sulphites |
| 9. Tree Nuts | 10. Wheat |            |              |

The following are essential elements of an effective Allergen Control Plan:

## 1. Master List of Ingredients

Identify the sources of allergens in your facility:

- Use a master list of all ingredients used in your facility.
- Identify those ingredients that either contain, or may contain, allergens.
- Consider both primary and secondary ingredients like spices, flavourings and additives, ensuring all possible sources are listed.

## 2. Allergen Mapping

Look at the entire production process from start to finish and identify any hazards that need to be controlled. This is referred to as Allergen Mapping. The following should be reviewed:

- Production scheduling
- Ingredient substitution
- Cross-contamination (receiving, production, and storage)
- Use of re-work
- Labelling

## 3. Purchasing

Develop procedures for purchasing of ingredients to ensure proper control and identification of allergens for incoming ingredients. These should include:

- A list of approved suppliers and ingredients.
- Ensuring suppliers have a documented and implemented allergen control plan. This allergen plan should include notification to their customers in the event that a change is made to their ingredient blend formula which adds or eliminates an allergen.
- Supplier specification for each ingredient or ingredient blend clearly listing each ingredient and/or components of ingredients.

## 4. Receiving

Receiving is a facility's entry point for raw materials and ingredients. By placing controls over what is allowed in, or how it is received, the facility can better control incoming allergens.

- Clearly label incoming products that contain allergens. If possible colour code for each allergen for easier identification.
- Inspect each load to ensure that packaging has not been damaged or compromised to reduce the risk of cross contamination.
- Compare the labels on the incoming materials with the specification sheets to ensure that the ingredients match and the allergens have been properly declared.

## 5. Storage

Procedures for the proper storage of ingredients containing allergens must be developed. The following should be taken into consideration:

- Ideally, allergenic ingredients should be isolated from allergen-free ingredients in storage.
- If allergens and non-allergens are to be stored on the same racks or shelves, the materials containing allergens must be placed on the lowermost racks.
- Storage racks or areas designated for allergen storage must be clearly marked. The use of large, easily visible labels, plus icons and/or colors for different allergens, will help ensure that materials are properly stored.

## 6. Production

Ideally, dedicated equipment and rooms should be used for the manufacture of products containing allergens, however, when this is not possible, proper scheduling of production is the next best option.

Sequencing - If multiple products are to be made on the same line, in the same room, or on the same equipment, the key is to produce from the least allergenic to the one with the most, ensuring that each subsequent product contains the allergens from the one before.

For example:

- 1st - no allergens
- 2nd - milk
- 3rd - milk and soy

Once a new allergen has been introduced do not go back and run a product that has less allergens or that does not contain any allergens.



Another method used for controlling allergen cross-contamination is to perform a complete sanitation prior to, or following, the run of an allergen-containing product on a particular line.

Minimize contamination with allergens through the use of dedicated or colour coded utensils, containers and tools. For example with utensils, ingredients containing milk might be handled with white scoops and those with soy, yellow.

## 7. Use of Re-Work

Re-work is when one batch or lot, of product is incorporated into a subsequent batch or lot, or either the same or different product at a later date. If using re-work, procedures need to be developed that detail the controls around its use.

When using re-worked products, always add "like into like", ensuring that all allergens are properly declared on the label and records are maintained to ensure traceability.

## 8. Labelling

Develop procedures to review labels at least annually or when changes are made to product formulations.

- Verify label accuracy; update to reflect current formula.
- Ensure compliance to labelling regulations.
- Limit use of precautionary labelling (such as 'may contain') in lieu of good manufacturing practices. Do not list ingredients that are not in the formula.
- Manage excess packaging materials; remove outdated containers or labels from the plant.

## 9. Sanitation

Cleaning in between allergen and non-allergen product runs, reduces the risk of allergen cross-contamination.

- Have standardized procedures for sanitation operations (SSOP's) and ensure they are followed.
- Use appropriate cleaning methods and proper equipment and tools.
- Focus on hard to clean areas - valves, pumps, dead spots.
- Ensure adequate lighting in the proper locations (including flashlights to check inside equipment).
- Move equipment as necessary to make it easily accessible for cleaning; disassemble where necessary.
- Evaluate sanitation effectiveness by sight, bioluminescence testing, and/or ELISA testing.

## 10. Employee Training

To ensure that the allergen control program works, both management and employees must be trained to understand their roles and responsibilities.

The training should include the following:

- Define allergens, consequences to sensitive people, importance of allergen control, most common areas where problems occur, and control measures used at the plant.
- Records to be completed.
- Deviation procedures.

Allergen training should take place upon hire and refresher training at least once a year. Records of training should be maintained on file and include the following:

- Date of training
- Employee name and signature
- Person giving the training
- Content

## Product Development

When developing new products it is important to minimize the use of potential allergens. If there is a choice between using an ingredient that contains a small amount of allergen and one that does not, focus on eliminating the allergen. By doing this upfront, potential risks to consumers and the challenges of monitoring and controlling allergens in the plant are reduced.

For more information, resources, or help with your program please contact:

Daphne, OIMP Technical Director  
(519) 763-4558 Ext 222 or  
technical@oimp.ca

