

Let's Talk Allergens

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The Food Allergen Labeling and Consumer Protection Act (FALCPA) is a law that went into effect January 1, 2006. It requires that food labels identify the sources of all major allergens in the ingredient list in simple language, e.g. wheat flour, milk casein, whey (milk). Food allergies can be life-threatening. Consumers with allergies are dependent on our industry to identify, process and market foods which are labeled correctly.

The major allergens are milk, eggs, finfish, shellfish, tree nuts, peanuts, wheat, soybeans, and sesame. These nine allergens account for over 90% of all food allergies. Our industry uses all major allergens, even fish byproducts (fish gelatin).



An Allergen Control Plan protects the health of consumers as well as the reputation of your company. It is a written document regarding the storage, handling, processing, packaging, and identification of allergenic food ingredients in your facility. Your plan must be implemented, enforced and updated continually. Every time you hire a new employee, make sure they understand their role through documented training. Every time you begin working with a new supplier, evaluate their Allergen Control Program and change yours as needed.

The following are the fundamentals of an Allergen Control Plan:

Segregation:

Allergen control depends on keeping allergenic ingredients segregated from other food products from the time they enter your facility until they are introduced into the production line.

Segregating the product includes ensuring that an ingredient containing an allergen is never

stored above a non-allergen ingredient. Your plan should outline documentation to ensure your suppliers are diligent in managing allergens. As part of your Supplier Control Program, require Letters of Guarantee, Third Party Audit Results and Product Specifications. Ensure allergenic ingredients are shipped in clearly marked, sealed containers, and that containers are not damaged during transport. Clean any spills as soon as possible, use dedicated pallets for allergenic ingredients, keep containers clean and sealed.

Prevention of Cross-Contact during processing:

Production scheduling can go a long way toward preventing cross-contamination. It is important to consider when allergenic ingredients are introduced into the process and how traffic could inadvertently carry allergens from one point in the facility to another. Schedule long runs in order to minimize changeovers. When possible, add products containing allergens as late in the process as possible. Use rework containing allergens only in formulas containing the same allergen, “like into like only” policy.

Product Label Review:

Make sure to have a label approval process for your products or changes to current products. Remember ingredients can vary if you utilize different vendors for the same ingredient. Also have a process in place to identify ingredient changes when receiving incoming ingredients. New product specifications and formulation changes must be reflected on labels immediately. Make sure packaged foods comply with FALCPA; it is important to know companies cannot arbitrarily add “may contain” because precautionary labeling should not be used in lieu of adherence to Good Manufacturing Practices. Train line personnel to ensure labels are switched appropriately at product changeover on the production line. It is also important to consider how you will make this information readily available to the consumer. One recommendation is to post ingredient and allergens on your website. This will allow for you to make changes and timely and accurately communicate with your consumer.

Allergen Cleaning Program, Verification and Validation:

Extensive allergen cleaning is necessary to get rid of allergenic proteins. Sanitation Standard Operating Procedures should be clearly written and easy to follow. Define who is responsible for the cleaning operations, include detailed cleaning instructions and keep detailed records. Only use equipment with good sanitary features: ease of cleaning and sanitizing, no dead spots, self- draining, accessible for visual inspection.

Cleaning verification can be as simple as a daily documented visual inspection of the equipment performed by trained employees. Visual inspection includes, but is not limited to, making sure there is no food or chemical residue, your equipment is in good repair, checking gaskets and seals and confirm that the equipment surface is smooth, no scratches or pits as well as inspecting area above and near equipment. Other cleaning verification and/or validation procedures should be clearly written. Describe analytical procedure, define the final verification/validation criteria, keep detailed records.

A final note: Sulfites and artificial colors (like FD&C yellow #5) do not elicit true allergic reactions but they are a form of food intolerance or sensitivity. Make sure FD&C colors are listed on ingredient statements and list Sulfites if present at more than 10 ppm. If not able to verify the sulfite concentration, list them on the ingredient statement. Failure to list these ingredients will trigger a recall.