Allergen Control Plan - Overview and Guidance

An allergen control plan (ACP) is about protecting the health of consumers with food allergies, and protecting the financial health and reputation of your company. The following items should be part of your ACP.

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, flavorings 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
- Labeling

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 color 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

Consider potential strategies for protecting against allergen cross-contamination during the production of products.

Separation: 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.

Sanitation: 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 color 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. Labeling

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 labeling regulations.
- Limit use of precautionary labeling (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 facility.

9. Sanitation

Cleaning in between allergen and nonallergen 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 or testing (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 facility.
- 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 facility are reduced.