

Guidance for Developing Good Operating Practice Procedures: Allergen Management

August 2011
Amendment 1

Background

A food allergy is a type of food intolerance that causes a reproducible adverse reaction involving the immune system. The effects of a reaction to food allergens can be severe.

Standard 1.2.3 of [the Australia New Zealand Food Standards Code](#) (FSC) sets out those substances which must be clearly listed on a food label to inform consumers of the presence of allergens as an ingredient or component of an ingredient in the food. These substances include bee pollen and propolis, royal jelly and all those substances in the Table to clause 4 of the Standard.

If a food is not required to have a food label, the FSC requires that this information must be made available to the consumer upon request.

In preference to using voluntary warning statements (e.g. 'contains traces' or 'may contain'), MAF expects that cross-contamination issues are managed so that consumer choice is not restricted unnecessarily. Not all food businesses will need to control allergens. For example, businesses making only one type of bread will have different allergen management requirements from a baker making a range of biscuits, some of which may include peanuts as an ingredient. A statement such as "all products contain wheat as an ingredient; no other allergens are processed on site. Wheat flour is labelled appropriately as an ingredient" may be a suitable allergen statement depending on the range of activities that a business covers. The statement "all ingredient suppliers have supplied information about the allergen status of the ingredients we use. Formulation changes and new ingredients are checked for allergen status".

For further information refer to:

[MAF Labelling Guide](#) [PDF (2 MB PDF)].

Australian Food and Grocery Council. [Draft Allergen Management and Labelling Guide](#).

Food Standards Agency (UK). [Guidance on Allergen Management and Consumer Information](#).

The Allergen Bureau. [Allergen Awareness Training](#).

1 Purpose and Scope

Write up your purpose and scope for Allergen Management.

Example: To ensure products are correctly labelled to identify the ingredients that are allergens, or that contain allergens, and to manage cross-contamination where required.

2 Authorities and Responsibilities

Write up who has specific authorities and responsibilities for Allergen Management. Think about managers, supervisors and other people as may be necessary, including contractors.

Example: The business operator has the overall responsibility for Allergen Management. Specific staff responsibilities are assigned as follows: [include specific details against a job title or role].

3 Control Measures

Write up how you ensure the correct identification and control of allergens.

Consider at least the following points:

3.1 Raw Materials and Ingredients

- how you know the status of the raw materials and ingredients that you receive from your suppliers, e.g.:
 - ask for specifications for the products you receive;
 - ensure the supplier has effective allergen management practices in place (including appropriate cleaning practices and product storage); and
 - ensure the supplier has a procedure in place to notify you if the allergen status of any of the raw materials or ingredients changes.
- how you ensure, if you use allergens as ingredients or ingredients that contain allergens, they are clearly identified and controlled, e.g.:
 - labelling of allergenic material and traceability through to finished product (refer to separate guidance on Identification and Traceability); and

- keeping records of recipe batches and production schedules to verify the effective control of allergens.

3.2 Personnel

- how you ensure the behaviour and knowledge of staff is appropriate to control allergens, e.g.:
 - awareness of the importance of product identification and recipe control; where rework is needed staff are aware of specific controls to prevent cross-contamination;
 - effective hand washing between uses with different ingredients;
 - use of separate utensils for specific products;
 - following correct procedures for waste disposal and ensuring that any spillages are cleaned immediately.

3.3 Processing

- how you ensure production is managed to control allergens, e.g.:
 - where possible, foods containing known allergens are processed on specific equipment or in a separate area;
 - if physical separation isn't possible, ensuring production schedules are organised so that foods allergenic material is processed last; and
 - ensuring sufficient time is scheduled for effective cleaning between uses to remove the allergen of concern.

3.4 Cleaning

- how you minimise the risk of possible allergen contaminants on equipment and in the environment, e.g.:
 - ensuring there is a effective cleaning schedule in place and that it is followed; any equipment that requires dismantling to ensure effective cleaning is dismantled and cleaned before reuse;
 - ensuring the cleaning method is appropriate and does not cause the spread of allergens further, (e.g. the appropriate use of air guns to remove debris);

- using allergen-dedicated cleaning equipment in areas that pose a contamination risk.

3.5 Practices to Prevent Contamination by Raw Materials and Packaging

- how you manage the potential for cross-contact and contamination during receipt, storage, preparation and handling of food, e.g.:
 - through the design and layout of the premises, equipment and facilities; and
 - effective separation during receipt, storage, preparation and handling (e.g. by time, distance or physical barriers). This include for any packaging that is meant to contain food that are allergen free.

3.6 Composition and Labelling

- how you comply with the declaration of any food allergens as required by the FSC (e.g. through labelling, display or provision of information); and
- how you manage changes to product formulations that may introduce new allergens.

4 Monitoring

Write up how you check your allergen management requirements are being met.

Consider the following:

- spot checks that the suppliers information regarding allergens is current and accurate;
- pre-operational checks to ensure the correct raw materials, formulations, packaging and equipment are used;
- routinely reviewing product formulations and ingredient lists to check all allergens present or used as ingredients are included on the product label; and
- product inspection to check that labels meet FSC requirements.

If you are specifically marketing allergen free products, you should also consider the following:

- laboratory testing for the presence of food allergens; and
- testing of cleaned surfaces for allergen residues.

5 Corrective Action

Write up how you correct any problems that monitoring identifies, or that you otherwise become aware of.

Include how you cover the following:

1. Defining the extent of the problem (i.e. what has happened, why and when it happened, and how much and which (if any) product has been affected);
2. Restoring control (i.e. the action needed immediately to stop more product becoming affected and to fix problem);
3. Handling affected product (e.g. preventing any suspect product from being released; following your procedure for dealing with non-conforming product. Refer to separate guidance on Complaints, Non-conforming Product, Corrective Action and Recall);
and
4. Prevent re-occurrence (e.g. using information gained from the problem to identify better ways to do things; amend your procedures; improve the checking systems; fill gaps in staff training etc.).

6 Documentation and Record Keeping

Determine what records you need to keep for the Allergen Management procedure. These will help you to introduce and maintain consistent good practices, and to demonstrate to your verifier (auditor) that you are sufficiently controlling those factors that can impact on the safety and suitability of the food.

Assess any records you already have, and introduce any additional records you need for the monitoring and corrective action activities you specify in your procedure. When monitoring, you may have an option to either:

- record every check; or
- indicate that checks have regularly been carried out (e.g. throughout a week) and only record the results of a specific check where something went wrong. In these instances, always make a record of what you did to put things right (the corrective action).

Keep blank record forms handy for staff to use and let people know where they are. Keep completed record forms together where they can be found easily for your regular internal verification checks.



For your [general programme requirements](#) refer to the guidance document on the appropriate risk-based programme or plan which can be found on the Food Safety website.