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Technical Summary: Allergens and your Food Safety Management System

In Australia, over 8% of children and 2% of adults have a food-based allergy, which in economic terms equates to nearly 3 quarters of a million customers, or 3% of the population.



Concern over allergens has risen steadily over the years and allergen related stories are prevalent in the news on a regular basis.

In the 10 years to December 2018, undeclared allergen was by some margin the most common reason for a recall of product in Australia – almost 40% of all recalls, compared to 27% for second placed microbial contamination.

Of the allergens responsible for recalls, milk was the worst offender at 30%, with peanut (18%), multiple allergens (16%) and wheat/gluten (10%) trailing behind.

Recalls are expensive in both direct economic terms and reputational damage, so it's vital for a food business that robust controls are built in to the Food Safety Management System (FSMS).

Here are 7 key tips to bear in mind when developing your FSMS allergen controls:

1. **Know your supply chain** - only buy from reputable suppliers, who have their own auditable HACCP/FSMS in place. Ensure that you ask suppliers to provide you with allergen information about every raw material supplied. Keep and maintain an approved suppliers list. The Allergen Bureau website provides a form that you can use to gather Product Information from your suppliers: <http://allergenbureau.net/vital/food-industry-product-information-form-pif/>
2. **Know your ingredients** - are there any allergens present, are they prepared in facilities that also prepare allergens, is there a point in your process where cross-contamination can occur? Consider separate production lines for allergen containing products to keep them spatially separated from non-allergen containing products

3. **Train your staff** - how are potential allergen containing products handled, stored and cooked when entering your facility? Does management know and communicate best practice around allergen management and handling? Are the cleaning and sanitation procedures documented and available to all staff involved in the cleaning process?



4. **Know your processes** - at what stage is the risk of cross-contamination likely to be highest? What documented controls are in place to eliminate or reduce the risk of cross-contamination of non-allergenic products with those containing allergenic ingredients (HACCP/FSMS)? Are there regular internal audits to verify that final product formulation matches the records of ingredients used and that the product label accurately reflects the finished product?
5. **Test your products** - regular, planned testing (by a NATA accredited laboratory) of finished product for the presence of allergens will ensure that you are adequately verifying your control processes and will provide assurance that your risk management processes are robust

6. **Know the regulations** - Standard 1.2.3 of the Food Standards Code stipulates which allergens must be declared on the label if present in a food product (<https://www.legislation.gov.au/Details/F2017C00418>). Failure to declare an allergen in a product could prove costly in a number of ways: severe reaction, illness or even death of consumers; product recall; prosecution of food business owners/managers

7. **Know what to do** - if things go wrong, do you know what the procedures are for recalling affected products? Are all your products fully traceable? Do you keep accurate customer records? Do you undertake mock recalls to test the robustness of your system?

You can view a comprehensive presentation on conducting a product recall here:

<http://www.slideshare.net/NickCork1/conducting-a-food-product-recall-57201636>

If you require support for allergen management and control in your facility, please contact Nick Cork MAIFST:

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