

ALLERGEN MANAGEMENT GUIDELINES FOR FOOD MANUFACTURERS

*Self assessment questionnaire:
How well are you managing food allergens?*

Introduction

Managing allergens is a food safety priority. Many Canadian manufacturers implement allergen controls to help mitigate risks to consumers – in the same way they manage other food safety hazards – and integrate them into their overall food safety program (e.g., HACCP). Considered a chemical hazard, allergens must be effectively managed throughout the manufacturing process in accordance with the Safe Food for Canadians Act. This requires that preventive controls be implemented to manage allergens to ensure they do not unintentionally appear in products in which they are not intended.

Having an effective allergen management plan in place not only ensures regulatory compliance, but it can also potentially increase the size of your consumer market.

Over 3 million Canadians live with food allergy, and 50% of households make purchasing decision on their behalf. This means that when purchasing products for home, the classroom, sporting events or for work functions, the needs of those with food allergy are considered and will drive product selection and ultimately, the products purchased.

Industry-informed consensus guidelines – **Allergen Management Guidelines for Food Manufacturers** – have been created to help you meet your regulatory requirements and also expand your market potential. To see if the recommendations provided in the guidelines could be helpful to your organization and to see how well you are currently managing food allergens, please complete the following questionnaire.

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Questionnaire

How well are you managing food allergens?

Question 1	<p>Do your current preventive control plans – based on HACCP principles – include specific elements to address managing and controlling priority allergens in your operation?</p> <p>Yes</p> <p>No</p>
Question 2	<p>Are the following elements included in your allergen management approach?</p> <p>Hazard identification and assessment (e.g., list of allergens, allergens included in HACCP plan, allergen mapping)</p> <p>Supply chain and supplier validation requirements (e.g., supplier approval and control, traceability, access to information along the supply chain, recall plan)</p> <p>Management of ingredients, raw materials and processing aids within the facility (e.g., complete list of allergens in information sheets and/or certificates of analysis, allergen testing for verification)</p> <p>Risk management during manufacturing (e.g., segregation, recipe verification, production scheduling, traffic flows, rework control, maintenance tools control, allergen testing for finished products)</p> <p>Cleaning (e.g., allergen sanitation procedures, validation and verification of cleaning)</p> <p>Risk communication (e.g., label verification, justified use of PAL, communication with consumers via digital channels, management of consumer complaints)</p> <p>Employees (e.g., staff education and training, management commitment)</p> <p>Equipment and factory design (e.g., equipment layout, ability to disassemble equipment for cleaning, air circulation)</p> <p>Product development / reformulation (e.g., awareness of the implications of adding new allergenic ingredients, awareness of potential changes in allergen profile when using different suppliers for the same ingredient, risk management during factory trials)</p>
Question 3	<p>Does your food business produce finished products with precautionary allergen labelling (e.g., “May contain”)?</p> <p>Yes</p> <p>No</p>
Question 4	<p>Do you have a risk assessment process in place to determine when to use precautionary allergen labelling?</p> <p>Yes</p> <p>No</p>

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5

Do you follow the industry recommended criteria below for determining the use of precautionary allergen labelling in your operation? (*Adapted from Grocery Manufacturers Association, 2009*)

Precautionary allergen labelling should only be used when each of the following four criteria are met:

1. Where a food allergen in the manufacturing facility constitutes a risk of presence in products where such presence is unintended
2. Where the risk of allergen presence of the food allergen in food products that are not intended to include the allergen cannot reasonably and feasibly be minimized without major revisions to manufacturing processes or equipment beyond GMPs
3. Where the food allergen is likely to be present in some, but not all, of the food product where its presence is unintended
4. Consuming the food allergen in a product where its presence is unintended would constitute a health risk to a consumer allergic to the allergen (as determined by a risk assessment)

Yes

No

Next steps

- If you answered mostly “No” to the questions above, these guidelines can provide you with a starting point and provide you with a roadmap on how to develop a robust allergen management approach.
- If you mostly answered “Yes” to the questions above, these guidelines will provide an opportunity for you to review and potentially enhance your existing allergen management practices.

Get started – access our resources:

- Review the [User Guide](#)
- Download the [Allergen Management Guidelines for Food Manufacturers](#)

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