

Allergen control checklist: manufacturing premises



FOOD
STANDARDS
AGENCY

Checklist for local authority enforcement officers to audit allergen control measures when carrying out inspections of manufacturing premises

Name and address of premises:

Name of inspector:

Date:

Ref:

This checklist is not exhaustive and is intended to be a guide only.

People

- Identify the total number of food handlers and check that they have been trained in food allergen control.
- Has in-house training been recorded?
- Are staff able to recognise which ingredients are the allergens of concern and why?
- Can staff identify potential allergen cross-contamination situations?
- Are there clear procedures for hand washing?
- Are instructions for clothing requirements (including laundering) clear?
- Are staff aware of re-work procedures?
- Are staff aware of the waste management procedure?
- Is there a protocol for people moving around the site, for example people changing production line or site, maintenance staff, trips to the canteen and visitors?

Raw materials and supply chain

- Is there an appropriate and proportionate policy for assessing the allergen status of ingredients?
- If appropriate, is there a protocol for assessing those ingredients used by suppliers or co-packers?
- Is there a protocol for ensuring that any change in supplier is accompanied by the appropriate checks?
- Is the allergen status of all ingredients checked with suppliers and reviewed regularly?
- Do suppliers notify the manufacturer of changes in the allergen status of the materials they supply?
- Are there protocols to ensure the handling of allergenic ingredients does not cause contamination of other ingredients?

Storage

- Are steps taken to ensure that non-allergenic ingredients do not come into contact with allergens in subsequent handling and storage? For instance, are allergenic raw materials stored in clearly identified areas where possible, for example by using colour-coded boxes or demarcation of storage areas using painted lines on the floor?
- Are allergenic raw materials de-bagged or de-boxed, placed in dedicated lidded and labelled containers, and made easily identifiable?

Sieving

- Is it possible to have dedicated sieving equipment?
- Is it possible for allergenic ingredients to be sieved after all other raw ingredients have been sieved for the day?
- Is sieving equipment thoroughly cleaned after allergenic ingredients are sieved?

Manufacturing premises, equipment and processes

- Is it possible to manufacture non-allergenic lines in a different part of the production area?
- Is it possible to erect physical barriers between the production lines to avoid cross-contamination?
- Is it possible to use dedicated equipment for non-allergenic lines?
- Is it possible to minimise unnecessary movement of materials?
- Could cross-contamination be reduced by appropriate scheduling of production runs, including the appropriate cleaning of equipment between production runs?
- Are recipes available in all mixing areas so that staff can adhere to mix instructions?
- Is it possible to manage re-work better to ensure that residual material containing an allergen is not re-worked into a product not containing the allergen?
- Is it possible to use a separate air supply to avoid contamination?
- Is it possible to prevent equipment movement around the site, for example maintenance tools and food trays?
- Are held-over products suitably labelled?

Cleaning

- Are there adequate procedures in place for cleaning both production and packaging machinery, and are records kept?
- Is there a protocol to ensure that the cleaning of one production line does not contaminate another, (as could happen when employing compressed air cleaning) or an area which has already been cleaned? Are dry mix areas cleaned from the top down?
- Are spillages that occur during production, storage and transportation cleaned up immediately to ensure that there is no subsequent allergen cross-contamination?
- Is there a protocol for spillages of allergenic materials where they are labelled and physically moved away from the non-contaminated ingredients and work in progress?
- Are there dedicated tools (or adequate cleaning procedures where tools are not dedicated) for non-allergenic ingredients?
- Is the cleaning protocol validated as 'fit for purpose' and is compliance monitored?
- Does the cleaning regime include the laundering of protective clothing?

Packaging

- Are there procedures for checking that the correct labels are applied to products and are these procedures audited regularly?
- Are there checks in place between processing and packing to ensure the correct packaging is used, for example the use of automated label verification systems?
- Is there a protocol for destroying old packaging when a recipe change is introduced?
- Are there systems in place to ensure that packaging is removed at the end of a run, including any packaging that may be in the wrapping machine?
- Is there a procedure for removing packaging from wrapping machines and labelling it before returning it to the stores?
- Is there a protocol to ensure that the correct outer packaging is used for multi-pack products and that allergen information appears on, or is visible through, both the inner and outer wrappers?

Re-work

- Is re-work clearly identified so it can be tracked in the manufacturing process? For example, oils used for cooking allergenic foods (such as nuts, shellfish and fish) should not be used subsequently for cooking products not containing the allergen.

New product development

- During product development, is consideration given to substituting allergenic ingredients?

Reformulating products

- Has reformulation of a product been considered with a view to phasing out allergenic ingredients?

Extending brands into another product line

- Is consideration given to the impact of extending a brand name into a different product sector, for example an established chocolate product giving its name to an ice cream – especially if an allergen is then introduced that was not present in the original product.

Factory trials and consumer testing

- Are measures taken when conducting factory trials to avoid allergen cross-contamination with existing products, i.e. is information on the presence, or potential presence, of allergens available to those involved in factory trials or taste testing?
- Is there a protocol for providing allergen information during consumer testing?

Allergen-free foods

- If allergen-free foods are produced, are there procedures in place to ensure such claims are justified?
- If lists of foods that are free from particular allergens are produced, are these regularly reviewed and updated?

Allergen risk review

- Are allergen management systems monitored and reviewed to provide assurance that they are working correctly? These should include:
 - the review and verification of the hazard analysis and hazard management system
 - product and ingredient specifications
 - operating procedures
 - cleaning procedures
 - training records – demonstration of competence
 - analysis and investigation of customer complaints, with appropriate actions taken