

**SALSA Requirement:** “Allergens handled on site or brought on to site, shall be identified and the risk of cross-contamination shall be assessed. Controls shall be implemented to minimise the potential for cross-contamination.”

### Why?

Allergens in foods can cause reactions ranging from mild symptoms to death. It is a legal requirement to identify specific allergens on your food labelling.

#### Tools

- 🕒 Maintain a list of EU allergens (and others if exporting outside the EU).
- 📄 A list of allergens for all raw materials and for finished products made at your site.
- 📋 An allergens handling procedure.
- 👤 Allergen awareness training.
- 📦 Appropriate storage areas for nuts/peanuts.
- 📋 Production plan based on presence of allergens.
- 🧼 Cleaning procedures and testing of their effectiveness.
- 🎓 SALSA Food Labelling workshop or using a SALSA Mentor if you are unsure.

#### Tips

- 📊 Make spreadsheets/wallcharts of allergens per raw material & per finished product
- 🎨 Differently colour-coded equipment, utensils, coats/gloves/aprons can be used when handling specific allergens of concern such as nuts or peanuts
- 🕒 Plan cleaning times between making products containing different allergens
- 🧪 Schedule lab-testing of finished products & post-cleaning allergen swabs 3 or 4 times/year to show your systems are working
- 🧼 Use low-cost protein-residue swabs for routine cleaning efficiency checks
- 👀 Post-cleaning, do visual checks for food debris after using chopped nuts or whole grains
- 📋 Validate your cleaning procedures when introducing a new allergen to site for any NPD
- 📍 Consider using designated areas for nuts/peanuts and finished products containing these
- 🚫 If it's a nut-free site, don't allow nuts to be brought on site by staff, visitors and contractors.

### What do I need to do?

- Document a procedure which clearly describes how allergens are handled on site. Consider the points below when detailing your procedures.
- Identify what allergens you have on site.
  - Look at your raw materials specifications.
  - Don't forget to consider your suppliers – is there a risk to your products from cross-contamination at their site? You could ask in the supplier approval questionnaire and/or raw material specification what other Allergens are stored/handled on their site.
  - Look at your recipes and assess which products contain which Allergens.
  - Document your findings – a simple matrix can help (see the examples below).
- Look at your production process/storage areas to identify where Allergens will be present. The flow process diagram in your HACCP can help with this part. Remember staff movements too.
- Carry out a risk assessment on your process to identify where cross-contamination could occur *ie* from one product to another or within the environment. This information feeds into your HACCP.

### 1.4.3. Allergen Control

- When you have identified where the risks of cross-contamination occur, you will need to identify how to control those risks. Consider:
  - Checks for Allergen spillage at intake.
  - Labelling all raw materials and finished products showing what Allergens are present.
  - Storing materials containing Allergens so as to minimise contamination to non-allergenic materials *eg* by segregation or by storing non-allergenic materials above Allergen containing materials.
  - The different risks between open/unwrapped materials and fully sealed materials.
  - A specific, clearly marked area for weighing out Allergen ingredients.
  - Have procedures to cover dealing with spillage of Allergen containing materials. An Allergen-specific spill kit can be used.
  - Control any sampling of raw materials on receipt. Clean the sampling equipment after each use and store it hygienically. Do you need designated sampling equipment for Allergen containing materials?
  - Look at production schedules to reduce the risk of cross-contamination. Where possible, Allergen-containing finished products shall be made last (at the end of the day or end of the week if long runs are involved).
  - If all your products contain the same Allergen, there is no risk of cross-contamination between products. But be careful when adding ingredients *eg* dried fruit added to a cake might include sulphur dioxide.
  - What cleaning is required? You might do a simple clean-down between products containing the same Allergens, but a deep clean where a product does not contain a specific Allergen found in the preceding product.
    - Example: An egg mayonnaise sandwich might contain wheat, barley, egg & mustard. If the following chicken mayo sandwich contains the same Allergens – a simple clean-down is OK to clear debris. The next sandwich might be prawn mayo; this includes a new Allergen but has all the same Allergens as previously. NB If you go back to making egg mayo you will need a full clean-down.
    - You should validate the effectiveness of your cleaning procedures in removing traces of Allergens.
    - Consider using colour-coded, designated cleaning equipment (*ie* cloths, brushes, dustpans etc) for cleaning after Allergen-containing materials.
- Where you make ‘**free from**’ claims on the finished product, you must be able to justify the claim.
  - Even if you do not have the ‘free from’ Allergen in your raw materials, investigate the controls in place at your raw material suppliers.
  - Consider how you control any allergens staff bring on to site.
  - Where you are also manufacturing products on site which contain the ‘free from’ allergens you will need to demonstrate how you have prevented cross contamination. Validate and verify the effectiveness of your cleaning procedures using allergen swabs and/or an external laboratory.
  - Carry out periodic testing of a selection of your finished products to show they are free from the relevant allergen(s): at least annually but more frequently depending on risk.
- Where allergens (identified in the EU regulations) are present in a product they must, by law, be ‘*emphasised through a typeset that clearly distinguishes it from the rest of the list of ingredients*’ on the labelling. Ensure your procedures for SALSA requirements 1.12.1 & 1.12.2 are sufficient.
  - Allergens must be taken into account during new product development.
  - Using a label checklist is strongly recommended.
  - Your labelling controls for 1.12.2 will help to prevent labelling with the wrong label – often the cause of a recall of allergen-containing products.
- Train your staff in your procedures and also in the importance of allergen control. Include which Allergens can be brought on to site in your personal hygiene procedures. Re-train staff at least annually. Devising a short quiz about allergen controls on your site is a great way to train staff.

### 1.4.3. Allergen Control

- Food brought on to site should be stored only in the canteen fridge and consumed only in designated areas (eg canteen). No eating or drinking permitted in production or storage facilities.

#### Example

- The extract below is a simple matrix to record Allergens in raw materials and finished products.
- You should list all raw materials and finished products and mark the Allergens present in each.
- Use the Allergen matrix for your own raw materials to set up a matrix for all your finished products.
- Keep it up-to-date if you change ingredients and/or recipes. Check this if you change suppliers.
- Use it to train staff, to keep Allergens segregated in stores, plan production and to plan and document cleaning.

#### 1.4.3.a Allergens - Raw Materials

Raw Material	Gluten	Crustacean	Eggs	Fish	Peanut	Soya	Milk	Nuts	Celery	Mustard	Sesame	Molluscs	Lupin	Sulphites
Eggs	N	N	Y	N	N	N	N	N	N	N	N	N	N	N
White Bread	Y	N	N	N	N	Y	N	N	N	N	N	N	N	N
Iceberg Lettuce	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Mayonnaise	N	N	Y	N	N	N	N	N	N	Y	N	N	N	N
Prawns	N	Y	N	N	N	N	N	N	N	N	N	N	N	N
<i>etc .....</i>														
Doc Ref:	1.4.3.a Allergens – Raw Materials									Issue No:	1			
Issued by:	AT									Issue Date:	XX/YY/ZZ			

#### 1.4.3.b Allergens – Finished Products

Finished Product	Gluten	Crustacean	Eggs	Fish	Peanut	Soya	Milk	Nuts	Celery	Mustard	Sesame	Molluscs	Lupin	Sulphites
Prawn Mayo Sandwich	Y	Y	Y	N	N	Y	N	N	N	Y	N	N	N	N
<i>etc .....</i>														
Doc Ref:	1.4.3.b Allergens - Finished Products									Issue No:	1			
Issued by:	AT									Issue Date:	XX/YY/ZZ			

#### Where else can I find help?

- See Tools & Tips:** 1.3.3 Effectiveness of cleaning, 1.4.1 Minimising contamination, 1.5.2 Environmental controls, 1.6.2 Raw material specifications, 1.6.3 Raw material intake, 1.12.1 Labelling, 2.3 HACCP - Hazard Analysis, 2.5 HACCP - Risk Assessment, 3.2.1 Control of Non-conforming materials, 3.8.1. Finished Product specifications.
- SALSA Guidance Notes** - 1.4.3 Allergens Control - (includes a list of EU allergens).
- EU allergens are listed in an Appendix to the EU Food Regulations for Consumers 1169/2011
- Food Standards Agency online training for allergens - <http://allergytraining.food.gov.uk/>