

WHITEPAPER

Reduce Your Organization's Risk
for a Food Recall Due to Allergens:
Steps You Can Take Now





FoodChain ID Customers and Friends,

You have received this complimentary white paper based on your interest in food safety.

“Reduce Your Organization’s Risk for a Food Recall Due to Allergens: Steps You Can Take Now” provides practical tips for reducing the risk of recalls caused by allergen issues.

During business challenges now and in the future, FoodChain ID is here to support your certification goals and help you maintain trust with customers and consumers.

Best Regards,

The FoodChain ID Certification Team

FoodChain ID is a trusted source for food supply chain safety and transparency.

FoodChain ID serves more than 30,000 clients in 100+ countries. Our auditor team and processes are designed solely for food manufacturing and packaging companies, with 100% of our North American certification clients in the food industry. We are known for our service and industry-leading, proactive audit scheduling so clients can plan for their business needs. In fact, more than 90% of our audits are scheduled at least 9 months before the audit window.



Food Allergen Management

All commercial food production facilities have some form of an allergen management program. These programs address and control allergens through identification, declaration and cross-contact mitigation. Yet despite the existence of allergen programs, the US food industry continues to experience recalls due to allergens. In 2022, undeclared allergens were the leading cause of recalls for foods under the US Food and Drug Administration (FDA) oversight, according to Sedgwick Brand Protection report. The FDA states that undeclared allergens have been the leading cause of their agency's recalls for the past five years.

With sesame as the ninth major allergen introduced this year under The Food Allergy Safety, Treatment, Education & Research (FASTER) Act, more issues could be on the horizon. The FASTER Act requires surveillance and a report to Congress on food allergy prevalence, including severity and potential gaps in the regulatory process. The increased data from FASTER could lead to an expansion of the allergen list and increased scrutiny by regulators to ensure preventive controls protect allergenic consumers.

In addition to legislative mandates, food safety professionals are eager to learn new ways to improve current programs and mitigate the serious threat posed by allergens. Some of the basic principles of allergen control start with identifying allergens in our raw materials, segregation in warehouses, dedicated processing, scheduling, sanitation, and final declaration on labels. The design of these allergen control programs are based on the specific risk associated with the product and process, with significance of risk supported by the food safety/HACCP plan and overall food safety system. These robust programs and controls are intended to eliminate or reduce the hazard to an acceptable level. Although current programs may be sufficient to address risk, given the industry's ongoing recalls, new ideas should always be examined. An additional layer of allergen recall prevention could include improved organizational communication, enhanced verification, and reviewing staff behaviors.

The following ideas take a fresh look at how to proactively prevent an allergen recall from happening at your organization.

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1. EDUCATE KEY STAKEHOLDERS

For many organizations, the commercial team or other groups beyond R&D provide important input on new products. New ideas or reformulations, however, can introduce allergens or indirectly affect a process that could contribute to cross-contamination. Stakeholders should be included in staff training, with clear communication on expectations to prevent future problems.

What can you do?

- a. Educate stakeholders on all allergens handled at the production facility.
- b. Explain how product changes affect production and allergen risk.
- c. Require all organizational input to be communicated within a set timeframe so any changes are not rushed.
- d. Discuss proactively the existing and potential allergen risk, with solutions that could support the desired change and ensure there is enough time in the product launch plan.



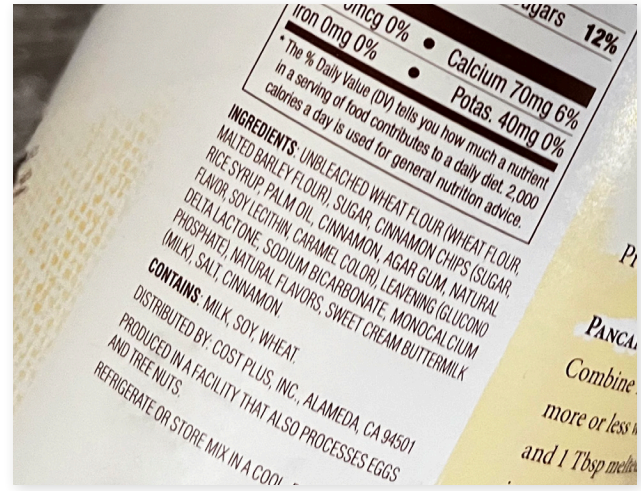
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2. REVIEW LABELING PROCESS

The design and control of labels have been identified as one of the common sources of poor allergen control management upon evaluation of recalls. Every organization must look at how labels are developed, changed, and inventory controlled to mitigate the potential for issues.

What can you do?

- a. Require design staff to create labels so that different product versions can be easily identified by color blocking, unique identifiers and icons.
- b. Mandate that the "Contains. . ." descriptions are easy to read by the facility and the consumer.
- c. Conduct a full label inventory, destroy obsolete labels, and ensure current versions are the only accessible option.
- d. Organize labels with dedicated locations, signage, and samples of the label hanging from the space.
- e. Examine all storage and production areas critically to prevent mixed cases or pallets.
- f. Review and document the process to change a label: who gets notified, how new labels are approved, and what controls are in place upon receipt of new labels.



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3. CHALLENGE YOUR VERIFICATION ACTIVITIES

Food safety professionals set up traceability exercises, record reviews, and additional checks to verify programs are working as intended. Instead of doing more verification checks, evaluate allergen program effectiveness by conducting challenge tests to identify potential gaps. The goal is to identify ways to put up procedural barricades, so the wrong label is not added to a product.

What can you do?

- a. Conduct a mock challenge of all or parts of the allergen management control plan, much like a food defense program. Set up controlled scenarios where a label gets stored incorrectly or where not enough labels are sent to the line, then observe and evaluate the potential work arounds.
- b. Compare your monitoring activities to your verification activities. Are you doing an additional check that could help catch an issue? How many rolls or cases of product could be missed if there is just one hourly check? One change to monitoring activity might be to have the packaging operator be the qualified individual that checks every roll/case and the QC team conduct the hourly checks as part of the verification activities.



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4. ASSESSING AND CHANGING BEHAVIORS

Food safety culture is not just a buzz phrase but rather a mission to assess and change behaviors that could lead to food safety issues. Once we understand our strengths and weaknesses, we can shift the culture to one that empowers employees to be more effective in communication and decision making. Many allergen recalls are a result of both poor programs and practices that could be prevented if we proactively identified what could go wrong and educate our team on the "why's".

What can you do?

- a. Conduct direct observations and interviews to determine current understanding of the allergen management program and each staff's role in the process.
- b. Ask what staff would do when things go wrong, such as not enough people to clean the line, running out of labels during packaging, or identification of an issue.



- c. Develop improved programs and training that address learnings and share the importance of effective allergen management to ensure competency and empowerment of the team to make the right decision every time.
- d. Verify that any changes have eliminated or significantly reduced the risk, with a mindset of continuous improvement.



Controlling for Animal Allergens

FoodChain ID offers Plant-based and Vegan Certification to meet the rapidly growing consumer demand for products in the plant-based, vegetarian and vegan categories. The certifications clearly communicate sought-after product labeling to consumers, while also protecting brand reputation and mitigating risk based on rigorous standard requirements.

Nine foods are regulated as major food allergens in the United States, making up 90% of food allergic reactions. Four of the nine allergens are animal-origin: milk, eggs, fish, shellfish.

FoodChain ID is a certification body for BeVeg Vegan Certification, the only ISO 17065 and 17067 accredited vegan trademark and the only vegan certification standard with animal allergen controls.

BeVeg Vegan Certification includes audits to confirm proper controls are in place, including cross-contamination prevention.



Food Safety Solutions

Food & Feed Safety Certification

GFSI: BRCGS, SQF, FSSC 22000, GLOBALG.A.P., IFS | Other: ISO 22000, FCA

Food Safety & Risk Assessment

Food Fraud Database, Ingredient Risk Identification by HorizonScan™

Product Certifications



Non-GMO Project



USDA Organic,
accreditation from
Bioagricert



EU Organic



Vegan and Plant-based

[FoodChainID.com](https://www.FoodChainID.com)

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