



Klipspringer

Compliance with confidence

**Version
Two**



Simplifying allergen segregation

**10 tips to improve the way
you handle food allergens**

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You cannot afford a blasé approach to allergen segregation. Get it wrong and you endanger the wellbeing of consumers. You dent your bottom line and potentially put the future of your organisation in jeopardy.

But if you get allergen segregation right? You save money. You keep consumers happy. You enhance your reputation with suppliers, buyers and retailers. In this short white paper, we look at ten ways anyone involved in the food and beverage supply chain can improve allergen handling.

The EU's 14 Major Food Allergens



This paper was compiled by Sheena Britton, Technical Compliance Manager at Klipspringer Ltd. and previously a BRC qualified auditor. This detailed and experienced viewpoint from inside the factory provides the framework for this paper.



Sheena Britton - Technical Compliance Manager

1-2%
of adults
have food allergies

5-8%
of children
have food allergies

11 million
Europeans
have food allergies

700%
increase
since 1990

Why does allergen segregation matter?

Undeclared allergens are a huge risk to food allergy sufferers. UK hospital admissions for children with food allergies have increased by 700% since 1990. Each year in the UK around ten people die from allergic reactions to food due to undeclared allergenic ingredients¹.

It's a widespread problem. In the UK, it's estimated that 1-2% of adults and 5-8% of children have a food allergy. That equates to around 2 million people². Across Europe, conservative estimates suggest the number of people living with a food allergy is 11 million. These figures are increasing year-on-year, and don't even include those with food intolerances, which would swell these numbers by a factor of around ten³.

Given the scale of the problem, food manufacturers are on red alert. But despite many factories implementing best practice, more needs to be done to tackle the challenge of segregation. Of 159 recalls made by the Food Standards Agency in 2015, 96 were allergy alerts⁴. Meanwhile the number of allergen-related incidents reported to the FSA is growing year-on-year: 89 in 2013, 127 in 2014 and 206 in 2015⁵.

¹Food Standards Agency: Allergy basics and stats - www.food.gov.uk/sites/default/files/facts-stats.pdf [accessed 14.06.2017]

²Food Standards Agency: Allergy basics and stats - www.food.gov.uk/sites/default/files/facts-stats.pdf [accessed 14.06.2017]

³AllergyUK: Allergy prevalence: Useful facts and figures - www.allergyuk.org/assets/000/001/040/Stats_for_Website_original.pdf [accessed 14.06.2017]

⁴FoodManufacture.co.uk: Food recalls rose by 78% last year - www.foodmanufacture.co.uk/Food-Safety/Food-and-drink-recalls-up-80-in-2015 [accessed 14.06.17]

⁵FSA: Annual report of incidents 2015 - www.food.gov.uk/sites/default/files/annual-report-incidents-2015.pdf [accessed 14.06.2017]

What can you see on the horizon?

If the bare minimum is not enough, what can be done to protect your integrity as a food manufacturer? The easiest and most cost-effective way to proactively improve your allergen segregation policy is to look to the future and anticipate risks.

Pay close attention to new and emerging allergens that are causing problems as well as alerts from the Food Standards Agency. This is called horizon scanning and it's a vital tool for staying ahead of allergen legislation, which can be slow to react to emerging threats.

Any food containing protein has the potential to elicit allergic sensitisation⁶ and there are over 170 foods known to provoke allergic reactions⁷. Although the 'Big 14' are identified in current EU legislation, there are many more allergens listed in requirements for other countries; if you supply to countries outside the EU you must comply with their specific requirements.

They include (but are not limited to) legumes such as green peas, chickpeas and fenugreek, fruits such as kiwi fruit, banana, tomatoes and peaches, seeds such as poppy, sunflower, pumpkin and pine nuts and buckwheat; to name a few⁸.

New food allergies are emerging all the time, so it is important to keep up to date with these

The lesson? Just because an allergen isn't listed in legislation doesn't mean it's risk-free.



⁶Taylor, S.L: Emerging problems with food allergens. Food, Nutrition and Agriculture 2000 26.

⁷Boye: Food allergies in developing and emerging economies: need for comprehensive data on prevalence rates. Clinical and Translational Allergy 2012 2:25.

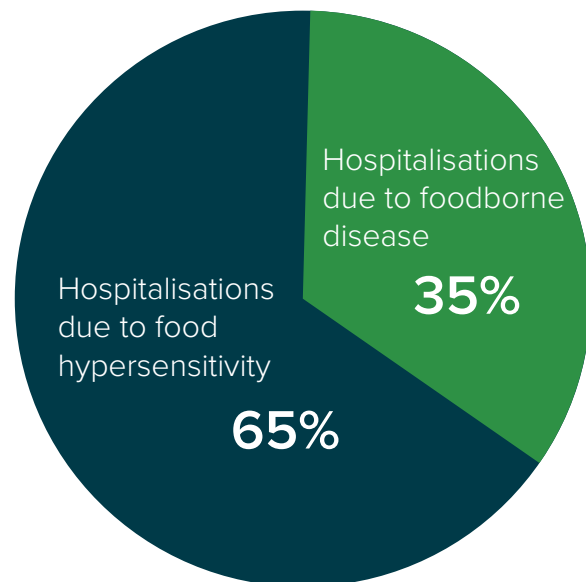
⁸Emerging Allergens Anaphylaxis Campaign 2013

Are we managing allergens effectively?

The FSA 2018/19 annual report found food incidents notified to the FSA in 2018/19 decreased 0.21%, compared to 2017/18.

However, there was a **36.7% increase in allergy alerts** in England, Wales and Northern Ireland over the same period.

The report also suggests the labelling rules for allergens introduced in December 2014 appears to have made little impact on hospital admission numbers⁹.



In an attempt to combat an increase in allergen alerts, the government plans on introducing new legislation for allergen labelling in 2019. The new laws will come into effect by summer 2021 in England, Wales and Northern Ireland, and will require full allergen labelling for food which is pre-packed and ready for sale¹⁰.

⁹ FSA: Consolidated Annual Report and Accounts 2018/19 - <https://www.food.gov.uk/sites/default/files/media/document/fsa-annual-report-accounts-2018-19-consolidated.pdf> [accessed 28.08.2019]

¹⁰ FSA: New allergen labelling law to be introduced by government - <https://www.gov.uk/government/news/new-allergen-labelling-law-to-be-introduced-by-government> [accessed 28.08.2019]

10 tips for smarter, simpler allergen segregation

Allergen segregation refers to keeping different allergens separated to avoid cross-contamination and minimise the risk of undeclared allergens reaching end-consumers. Even a tiny amount of a given ingredient can trigger a reaction in allergy sufferers.

There's a lot to consider. The ten points discussed in this paper will help you think critically and kick-start safer, smarter and simpler allergen controls.



Tip 1

Question the provenance of your produce

You spend countless hours perfecting your recipes, but do you really know what's in your ingredients? If external suppliers provide your ingredients, ask about the allergenic content. And if allergens are present, find out which specific ingredient is affected and what proportion of the raw material the allergen comprises.

Some suppliers may process many different allergens on their site, presenting a risk of cross-contamination between ingredients. Ask your supplier about the allergens they process (even if it is ingredients/products they handle for other customers), and the controls in place to prevent cross-contamination. If they cannot provide reassurance, you should assume that your ingredients contain allergens that you may have thought were unrelated to your ingredients.

You should also ensure that ingredients and raw materials are delivered pre-segregated. Check that all packaging is intact with no evidence of spillage and refuse delivery if you spot cross-contamination.

Tip 2

Create a system for labelling allergens

Once on your site, all allergenic content should be labelled. One of the simplest strategies utilises coloured labels, flagging the presence of a certain allergen with a label of a specific colour - for example: red for gluten, yellow for egg, green for nuts and so on.

Or you could simply have one type of tag that lists all fourteen food allergens named in EU regulations. If the allergen is present, put a tick next to it. It doesn't get much simpler than that. Find a method that suits your business and stick to it.



Tip 3

Isolate allergens during storage

Depending on your produce, your ingredients may spend months or mere minutes in storage. Either way it's important to ensure allergens are kept separate, perhaps using dedicated storage areas for different allergens.





Tip 4

Think visually

The human brain finds visual communication easier to process than written or verbal instruction. Visual content also makes your safety cues more digestible for operatives who are not native speakers of English. Colour coded products and images are your friends. For example, instead of writing the word 'peanut', you could use an image...





Tip 5

Bring colour to your production site

Many sites use colour coded products and PPE for different allergens to prevent cross-contamination when handling different ingredients. In addition, for large sites you could also use IndeliMarking to restrict the use of certain utensils to specific production lines.

Your aim is to make it easy for operatives to identify the correct utensils to use when handling different ingredients or allergens; to ensure the right items are used in the right areas by the right people.

'Colour coding' is a universal language, making it a quick, easy and cost effective way to mitigate the risk of cross-contamination - and it requires minimal training to implement.

Tip 6

Be smart about the storage of hygiene equipment

Cleaning and sanitation are vital to prevent cross-contamination. Every item of hygiene and production equipment should have a proper home where it can be found quickly - time after time. When utensils are scattered, there's a risk of equipment being used inappropriately: the wrong item, in the wrong place, at the wrong time, for the wrong job.

Again that risks cross-contamination, especially when you are using the same product to clean areas where different allergens are handled. Colour-coded shadow boards and wall storage systems make storage simple and ensure the right items are used in the right areas.

Think carefully about where utensils are most commonly used. Could you reduce downtime and cross-contamination by adding cleaning stations to the end of each production line? Don't be afraid to install a larger number of smaller shadow boards if it reduces risk and improves efficiency.

Cleaning Station





Tip 7

Create designated spill stations

In the event of an allergen spill, the first priorities are containment, removal and damage limitation. Dealing with spills effectively starts with using the right cleaning equipment and knowing where to find it. Designated spill station shadow boards make it easy.

Consider installing specialist stations in strategic locations throughout your production facilities - from the point of delivery to the point of packaging and all steps in between. Determine where spills most likely to happen on your production site...

A hand is raised in the air, palm facing forward, against a blurred background of a classroom or meeting room. The hand is wearing a red, textured sweater sleeve. Other people's heads and shoulders are visible in the background, suggesting a group setting.

Tip 8

Training is key to any process

The best allergen segregation strategy in the world isn't worth much unless your staff know how to follow it. It's why the importance of regular training cannot be overstated. Make sure all staff understand your process, protocols and controls.

Rehearse different scenarios regularly so staff know how to react. Prepare for the unexpected and staff will be ready to respond if something goes wrong. Remember: people rarely follow rules if they don't understand the reason. Reinforce the link between allergen control, consumer safety and the success of your company.



Tip 9

Who is responsible?

For your allergen controls to be successful, buy-in from your whole team is required. But you should still designate key responsibilities to specific members of staff. Accountability gets results.

For each area of responsibility, make sure you have a minimum of two trained staff on each shift. You need to be able to cover holidays, illness or unexpected absenteeism.

Make sure all staff can see who is responsible for what on a shift-by-shift basis - using a notice board in the staff room, for example.

You know who the first aiders on site are, make it known who the allergen champions are too.



Tip 10

Check, re-check and check again

Be prepared to audit your allergen segregation process regularly. Especially if you change suppliers or revamp your product lines. You need to make sure your process is smooth, streamlined and in-line with customer and market expectations, as well as legislation. The devil is in the detail.

Of course when you know your site inside-out, it can be easy to become blinkered and miss the obvious. Consider asking a third party or a colleague from a partner site to conduct your audit. Investigate yourself with the same rigor and standards that you would expect from an external audit. You will get a far more honest appraisal that picks up on the little things that can be overlooked when you are over-familiar with certain processes.

If your audit returns inefficiencies or problems, don't ignore them. Look at the root causes, modify your process, retrain your staff and then re-audit. It's a continuous cycle. But it's the only way to stay on the front foot of food safety and allergen segregation.

Over to you!

Creating a thorough allergen segregation policy can mean a lot of legwork. But the more effort you put in upfront, the easier it will be to instil an effective policy that's easy to stick to. Start with an audit or risk assessment of your current process. Consider all points where cross-contamination risks are higher, then install controls that mitigate the risks. It doesn't have to be difficult. In fact the simpler, the better.

Review your processes regularly. It's a constant cycle of adjustment based on the flux of legislation, staff churn, product lines and changes to clients and suppliers. Going too long without auditing your processes makes it more likely you will need a complete overhaul further down the line. That's expensive, disruptive and frustrating - and brings greater risks of non-conformance. Standing still is not an option.

Of course the hardest thing about change is implementing it. But with a little thought, preparation and training you can instil an allergen segregation process that keeps your food tasty, your end-consumers safe and your business protected from the potentially devastating threat of unlabelled allergens getting into the marketplace. Worth the effort? You bet.

| Action points | Completed | Initials | Date |
|---|-----------|----------|------|
| 1 Ask your suppliers about the allergen content of ingredients you are using, cross-contamination risks on their site and the controls they have in place to keep allergens separate. | | | |
| 2 Create a system for labelling allergens once they arrive on your site - with colour-coded tags, for example. | | | |
| 3 Use dedicated storage areas for different allergens. | | | |
| 4 Implement images and colours to aid understanding of your controls. | | | |
| 5 Use colour-coded production utensils for handling different allergens. | | | |
| 6 Ensure every item of hygiene equipment has a dedicated home using colour-coded shadow boards. | | | |
| 7 Install dedicated spill stations in strategic locations throughout your site. | | | |
| 8 Allocate overall responsibility for allergen segregation to key staff. | | | |
| 9 Implement a continuous cycle of auditing, reviewing, tweaking and training to stay safe and bring new efficiencies to your process. | | | |
| 10 Establish a program of horizon scanning to identify new threats and make calm, proactive changes. | | | |

Who are we?

At Klipspringer we create and deliver solutions that help the UK's 6,000+ food and drink manufacturers achieve compliance with confidence. Of the sites we have supplied with shadow boards, 96% have achieved A grade or higher in their BRC audit. For more on the ideas discussed in this paper, take a look at our blog.

www.klipspringer.com/blog

**Take charge of your allergen segregation today!
Contact our team to help you and your business to
a controlled allergen risk-free future.**

01473 461 800 / www.klipspringer.com





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What our clients say

"I enjoy ordering from Klipspringer because of the quality of your products and the range of products that you have available all in one catalogue. There is a good choice!"

"I have been looking for a solution and colour in this range - you have solved a problem I have had for a long time! Very happy..."

"The Klipspringer shadow boards are high quality, look fabulous and are easy to keep clean. The ordering system was easy and the proof was quickly produced. Customer services are there to help at every step of the way."

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