

4. Checklist for people working in: Food Production

Purpose: To help food producers improve the safety of food handling from an allergy perspective.

To help consumers with allergies and food intolerances.

Requirements: To be aware that consumers expect and demand that all food handlers have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read and understand the Food Sector Guidelines and have insight on what “allergy and intolerance” involves! It is important to be aware of the level of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other food intolerance-causing substances. The substances and products thereof listed below are those that most often cause allergic and adverse reactions. These are also the foods and ingredients for which special requirements regarding labelling and food information to consumers apply (Regulation (EU) No. 1169/2011 and Swedish National Food Agency regulation LIVSFS 2014:4).

<p>1. Cereals containing gluten, namely: wheat, rye, barley, oats, spelt, kamut or their hybridized strains, and products thereof, except:</p> <p>a) wheat based glucose syrups including dextrose¹;</p> <p>b) wheat based maltodextrins¹;</p> <p>c) glucose syrups based on barley;</p> <p>d) cereals used for making alcoholic distillates including ethyl alcohol of agricultural origin.</p>	<p>2. Crustaceans and products thereof.</p> <p>3. Eggs and products thereof.</p> <p>4. Fish and products thereof, except:</p> <p>a) fish gelatine used as carrier for vitamin or carotenoid preparations;</p> <p>b) fish gelatine or Isinglass used as fining agent in beer and wine.</p> <p>5. Peanuts and products thereof.</p>
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<p>6. Soybeans and products thereof, except:</p> <p>a) fully refined soybean oil and fat¹;</p> <p>b) natural mixed tocopherols (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, and natural D-alpha tocopherol succinate from soybean sources;</p> <p>c) vegetable oil derived phytosterols and phytosterol esters from soybean sources;</p> <p>d) plant stanol ester produced from vegetable oil sterols from soybean sources.</p> <p>7. Milk and products thereof (including lactose), except:</p> <p>a) whey used for making alcoholic distillates including ethyl alcohol of agricultural origin;</p> <p>b) lactitol.</p>	<p>8. Nuts, namely: almonds (<i>Amygdalus communis</i> L.), hazelnuts (<i>Corylus avellana</i>), walnuts (<i>Juglans regia</i>), cashews (<i>Anacardium occidentale</i>), pecan nuts (<i>Carya illinoensis</i> [Wangenh.] K. Koch), Brazil nuts (<i>Bertholletia excelsa</i>), pistachio nuts (<i>Pistacia vera</i>), macadamia or Queensland nuts (<i>Macadamia ternifolia</i>), and products thereof, except for nuts used for making alcoholic distillates including ethyl alcohol of agricultural origin.</p> <p>9. Celery and products thereof.</p> <p>10. Mustard and products thereof.</p> <p>11. Sesame seeds and products thereof.</p> <p>12. Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total SO₂ which are to be calculated for products as proposed ready for consumption or as reconstituted according to the instructions of the manufacturers.</p> <p>13. Lupin and products thereof.</p> <p>14. Molluscs and products thereof.</p>
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¹ And the products thereof in so far as the process that they have undergone is not likely to increase the level of allergenicity assessed by the authority for the relevant product from which they originated.

If changes involving allergens are made to a product or production process, the following control procedures should be reviewed to ensure that mistakes do not occur.

Control Point	Example of problem	Yes	No	Note current routines and areas for improvement
1. General points				
1.1 Internal controls/HACCP plans Are there HACCP programs that include allergy risks for all parts of the production chain – from receiving and storage of raw materials to finished product?				
1.2 Training Do the people who work in food production receive ongoing training in allergy issues?	Remember that replacement staff, job rotation workers, maintenance staff, etc. must also be trained. Employees must understand the risks of allergens in order to minimize contamination of the product by allergens.			
1.3 Information on recipe changes Are there procedures in place to ensure that those working in production are informed of recipe changes?	It is important that the workers involved attend project meetings and are assigned responsibility.			
1.4 Procedures for recipe changes Are there procedures for how recipe changes are to be handled in production?	HACCP programs may need to be reviewed, changes to product numbers for raw materials, intermediate goods and finished product may be needed, new packaging must be used, etc.			

Control Point	Example of problem	Yes	No	Note current routines and areas for improvement
<p>1.5 Alternate raw material suppliers</p> <p>Are there procedures in place to ensure that a raw material supplier, processing aid, etc., can not be substituted without the prior approval of the responsible persons in the company?</p>	<p>Regulations regarding labelling procedures for proper identification of suppliers.</p> <p>Different codes or other way of marking specific suppliers.</p>			
<p>1.6 Measures for suspected contamination</p> <p>Are employees encouraged to take immediate action in the case of suspected contamination, incorrect labelling, etc., and are there procedures for this?</p> <p>Inform the proper authority if there is reason to believe that a food product that has entered the market may be harmful to human health, and communicate the measures taken.</p>	<p><i>See also Handling Procedures for Product Alerts”, A1–E1, at the end of this checklist!</i></p> <p>Ensure that workers are aware of the serious risk of even very small quantities of allergen!</p>			
<p>1.7 Internal audits</p> <p>Are regular internal audits conducted to ensure compliance with the general points for control of allergy risks?</p>	<p>Immediate follow-up of corrective actions when shortcomings in allergen management have been detected.</p>			
2. Raw materials: Receiving, storage, weighing				
<p>2.1 Purchasing</p> <p>When purchasing and receiving raw materials, is consideration given to the risk of contamination prior to new raw materials entering the premises?</p>	<p>Clearly marked areas for the respective products.</p>			

Control Point	Example of problem	Yes	No	Note current routines and areas for improvement
<p>2.2 Reception of raw materials</p> <p>Are there procedures for how raw materials, ingredients and intermediate goods are identified when received to ensure that the right raw materials have been delivered?</p>				
<p>2.3 Labelling</p> <p>Are raw materials, intermediate goods and finished product clearly labelled so that there is no risk of mix-ups?</p>				
<p>2.4 Handling</p> <p>Are allergenic raw materials, ingredients and intermediate goods kept separate from each other and from other foods in order to minimize the risk of contamination?</p>	<p>This is especially important when handling unpackaged goods. Separate areas for storing and weighing allergenic raw material are needed, separate ventilation exhaust, etc.</p>			
3. Production, premises and equipment				
<p>3.1 Access to instructions</p> <p>Are instructions for how to prevent contamination visible or readily available in the production area?</p>				

Control Point	Example of problem	Yes	No	Note current routines and areas for improvement
<p>3.2 Design of premises, equipment and work tools</p> <p>Are premises, equipment and work tools designed to facilitate easy cleaning and to minimize the risk of cross-contamination of products and production lines?</p>	<p>This is especially important when handling unpackaged products, e.g. when weighing and mixing dry ingredients.</p>			
<p>3.3 Maintenance schedule</p> <p>Is there a schedule for maintenance of the premises and equipment?</p>	<p>Instructions regarding measures to be taken before maintenance is carried out, as well as cleaning up afterwards.</p>			
<p>3.4 Knowledge on hygiene design</p> <p>Do maintenance personnel have knowledge about hygiene design to minimize the risk of contamination, e.g. through proper design of piping, elbows and bends, pumps, etc.?</p>				
<p>3.5 Hygiene rules for employees</p> <p>Are there hygiene rules for all personnel, covering, e.g., clothing, hand-washing and hand contact with foods?</p>	<p>Keep in mind that hygiene rules also apply to all maintenance staff, contractors and visitors.</p>			

Control Point	Example of problem	Yes	No	Note current routines and areas for improvement
<p>3.6 Order of production</p> <p>Are there clear procedures for production order and how this is determined?</p>	<p>If products are packaged at a later time, attention must also be paid to allergy risks when establishing the packaging order.</p>			
<p>3.7 Recipes</p> <p>Are there procedures to ensure that the right recipe is always used?</p>	<p>Conduct regular controls to ensure that the recipe used on the production line matches the original recipe.</p>			
<p>3.8 Raw materials</p> <p>Are there procedures to ensure that the right raw materials are always used?</p>				
<p>3.9 Packaging</p> <p>Are there procedures to ensure that the right product is always packed in the right packaging?</p>	<p>In cases where packages have a similar appearance, such as for flavour variants, it is particularly important to ensure that the correct packaging is used. In this context, it is recommended that a checklist be used and signed by the responsible production personnel.</p>			
<p>3.10 Follow-up</p> <p>Do factory personnel continuously review possible situations for cross-contamination between products or production lines?</p>	<p>It is important to identify responsibility and authority. These reviews should also be carried out between regularly scheduled internal audits.</p>			

Control Point	Example of problem	Yes	No	Note current routines and areas for improvement
<p>3.11 Rework</p> <p>Are there procedures for the use of rework materials (internally recycled product)?</p>	<p>It is important that rework ends up in the right product and does not contaminate other products.</p> <p>Product containing an allergen should only be used in products where that allergen is already present. How and when rework may be used should be documented.</p> <p>Rework must be correctly labelled for proper identification and handling.</p>			
<p>3.12 Traceability of rework</p> <p>Is there a procedure for tracking the rework used to the finished product?</p>	<p>Keep in mind that contamination can also occur after manufacturing, e.g. when handling intermediate goods that have not been packaged for market.</p>			
<p>3.13 Waste management</p> <p>Are there procedures for waste management?</p>	<p>Waste must be labelled and be able to be distinguished from rework.</p>			
<p>3.14 Substandard <small>[kv1]</small> products</p> <p>Are there procedures for handling products that deviate from the standard product?</p>	<p>These procedures are necessary for traceability, blocking of shipments, etc.</p>			

Control Point	Example of problem	Yes	No	Note current routines and areas for improvement
4. Cleaning and controls				
4.1 Cleaning procedures Are there documented cleaning procedures to ensure that accidental contamination has not occurred?	Cleaning procedures are needed for the premises, equipment and work tools.			
4.2 Cleaning instructions Are there clear instructions for the cleaning required for premises, equipment and work tools?	Sufficient time must be allotted for cleaning. Hidden areas in the equipment must be identified, and equipment may need to be dismantled.			
4.3 Cleaning instructions – Production Are there clear instructions for the cleaning required between different products produced on the same production line?	If the products are packed at a later time, attention must also be paid to allergy risks when establishing the cleaning procedures for packing equipment.			
4.4 Post-production controls Are there procedures for, when necessary, testing a food after manufacturing to confirm that accidental exposure to allergen has not occurred?	If a suspected allergen is evenly spread throughout the final product, controls can be carried out in the form of analyses. Otherwise, documented visual controls may be used.			

Date:

Name of person who completed checklist:

Company name and address:

Review your work practices with the help of the checklist regularly. Take and document corrective actions. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
<p>A. General points</p> <p>A.1 Are there procedures for handling product alerts?</p> <p>A.2 Are the procedures used and followed?</p>	<p>The company's own procedures should always be followed first.</p> <p>People involved in product alerts are usually those who work with consumer contact, purchasing, and marketing and distribution managers.</p>	
<p>B. Gather information</p> <p>B.1 Is the consumer still sick?</p> <p>B.2 Which product did the consumer eat?</p> <p>B.3 What else did the consumer eat?</p> <p>B.4 Does the consumer have a known allergy or intolerance – to what?</p> <p>B.5 Tell the person you will get back to him/her.</p>	<p>If the consumer is sick – suggest that he/she seek medical attention.</p> <p>Note the product name, size, “use by” date, date of purchase, store where the product was purchased, batch number and GTIN code.</p> <p>If possible: save the product in question and try to obtain an unopened package from the same batch for testing.</p> <p><i>(Add your own comments to the checklist!)</i></p>	
<p>C. Evaluate</p> <p>C.1 Contact your supervisor or person in charge of handling urgent consumer complaints – evaluate together.</p> <p>C.2 If necessary, gather more information. Contact supplier? Perform analyses? Seek the assistance of the regulatory agency!</p>	<p><i>(Add your own comments to the checklist!)</i></p>	

Control Point	Comments	Notes
<p>D. Take action</p> <p>D.1 Protect other consumers – Consider whether sales should be stopped!</p> <p>D.2 Inform supplier and regulatory agency?</p> <p>D.3 Investigate whether the product should be recalled?</p> <p>D.4 Investigate, in cooperation with authorities, whether a press statement should be issued?</p> <p>D.5 Inform the affected consumer.</p> <p>D.6 Request an investigation and follow-up by supplier.</p>	<p><i>(Add your own comments to the checklist!)</i></p>	
<p>E. Follow up – Improve</p> <p>E.1 Once the case is resolved, follow up the outcome and discuss how your procedures can be improved!</p> <p>E.2 Ensure that the production workers responsible are informed of the situation.</p>		

Date:

Name of person who completed product alert checklist:

Company name and address:

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