



Allergen management policy

POLICY: The Rossen Market Development company is committed to reducing the risk to customers, staff and visitors about the provision of food and the consumption of allergens in food, which could lead to an allergic reaction. This policy will be available on Rossen Market Development company website and will be reviewed annually. The Rossen Market Development company will aim to minimise the risk of exposure, encourage self-responsibility and plan for effective response to possible emergencies.

PURPOSE: To ensure all precautions are taken to prevent product contamination by products that are determined as allergens.

RESPONSIBILITY: The QA Manager is responsible for ensuring this procedure is communicated and adhered to by all staff. The Commercial Manager is responsible for ensuring the procurement procedure with regard to allergens products is adhered to. The QC Manager is responsible for ensuring any necessary risk assessments etc are carried out.

INSTRUCTIONS: The following products fall under the remit of this procedure:

- Cereals containing gluten and products thereof
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soybeans and products thereof
- Milk and products thereof (including lactose)
- Nuts i.e. almond, hazelnut, walnut, cashew, pecan nut, brazil nut, pistachio nut, macademia nut and queensland nut and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations of more than 10mg/kg or 10 mg/litre expressed as SO₂
- Lupin and products thereof
- Molluscs and products thereof

Public Places:

Public places in factory such as toilette, cloak room ,..... are used in two different working times. These places should not be have any cross contamination.



Allergen management policy

Raw material

1. Technical Manager must establish which of raw material have allergens present on site at any time, and whether ingredients pose a risk to products. Where such a risk exists, an audit of the site must be carried out to assess allergen cross contamination risks. Any improvements identified as necessary to eliminate or reduce cross contamination risks, must result in an agreed plan of action with the raw material supplier together with timescales for completion.
2. QA Manager must establish audit frequencies based on audit findings and risk assessment.
3. Raw material and packaging supplier specifications must include declarations as to the presence of any allergenic products or ingredients on their sites.
4. Sorting of the allergen raw materials are carried out in separate room (formulation room of cereal bar line).

Handling of raw material

Intake

1. Packaging must be in good condition during transport and distribution.
2. Intake checks must specifically refer to the presence of allergens, and must verify that packaging is not damaged and there are no signs of any spillage.
3. Goods on pallets must not be over hanging as this makes them more susceptible to damage. Checks should also be carried out to confirm that all ingredients, including allergens, are fully and clearly labeled.
4. Raw materials should be clearly labeled with the allergens they contain unless this is clear and obvious from the normal pack outer labeling.
5. Deliveries must be rejected if the above criteria are not met.

Storage

1. Raw materials containing allergens must be stored in dedicated and marked area and must be fully sealed in their packaging at all times. Where practical e.g. when a small number of allergenic raw materials are being handled on site, these must be stored separately in clearly marked areas.
2. Staff must be trained to look out for any damage to packaging or spillage. In the event of any spillage, the following steps must be taken:
 - The Operations Manager, QC Manager, or QA Manager must be informed immediately of any spillage in any area.
 - Do not move any items of food, equipment or allergen products until the site has been examined by one of the above.
 - All staffs are to leave the area until all allergens have been removed.
 - On leaving the area, staff shoes will be inspected to ensure they are not contaminated with allergens.



Allergen management policy

- On leaving the area, affected staff protective clothing will be change to ensure there will be not any further cross contamination. Affected protective clothing will be discarded.
- On leaving the area, affected staff protective clothing will be change to ensure there will be not any further cross contamination. Affected protective clothing will be discarded.
- . The entrance door from other production line to kita bar production line are closed and specified as a emergency door.
- The area at risk will be isolated using colored tape and work clothes of staffs in these lines should be different with other production lines.
- A nominated staff member on instruction will pick / sweep up all allergens/fragments.
- Allergens will be placed in a marked polythene bag within a plastic refuse container.
- All food contact surfaces, food machinery, and floor areas will be wiped down using approved materials for removing allergens.
- Brushes, shovels, and cloths used to collect allergens must be disposed of, together with the polythene bag and plastic refuse container, immediately in the external refuse area.

- The nominated staff member's shoes are to be inspected before leaving the area.
- The colored tape is only to be removed once the Operations Manager, Technical or Quality Manager agrees that all allergens traces have been removed from the affected area.
- Any packaging or product that is judged to have been at risk is rejected.
- . Warehouse of the final products of cereal bars and other allergic products are different from the other products and location of allergic products are specified with labels or dashed line.

Production

Decanting from outer packaging into secondary containers

1. Where an allergenic raw material is being handled, a separate and dedicated room should be used for decanting the material from its outer packaging.
2. In the case of continuous 24 hours/day production or where allergenic materials are used on an ongoing basis throughout the production cycle, immediate and thorough cleaning of the area and all relevant equipment and utensils should take place after each time the allergenic materials are used.
3. Separate utensils must be used, which are dedicated for use with the allergenic material.
4. Other raw materials or 'work in progress' (allergenic or non-allergenic) should not be kept in close proximity and should be adequately protected against potential cross contamination.
5. Staff should always wash their hands immediately after handling any allergenic materials before moving onto another task.
6. Where an allergenic raw material is passed through a transfer 'sanitizing tunnel' e.g. into a High Care area, the checks must be carried out to confirm the integrity of the packaging and labeling.
7. The containers holding decanted allergenic raw materials should be dedicated to each material being handled, clearly labeled with the contents and effectively lidded or sealed.



Allergen management policy

Sieving and filtration

1. Separate sieves and filters should be used for allergenic material.
2. Where allergenic materials are being sieved a separate area should be provided, particularly where dust is generated (e.g. soya flour).
3. Allergens must be sieved / filtered into containers or bags which are immediately lidded or sealed and clearly labeled as containing allergenic material. Lidding and sealing must effectively prevent any accidental spillage.

Weighing up

1. Where an allergenic raw material is being handled, a separate and dedicated area should be used for weighing up.
2. In the case of continuous 24 hours/day production, or where allergenic materials are used on an ongoing basis throughout the production cycle, immediate and thorough cleaning of the area and all relevant equipment and utensils should take place after each time the allergenic materials are used.
3. Separate utensils must be used, which are dedicated for use with the allergenic material.
4. Allergens must be transferred into containers or bags which are immediately lidded or sealed and clearly labeled as containing allergenic material.

Quality Checks / Sorting

- 1- Personnel taking samples should immediately wash their hands after taking sample
2. Samples should be sealed during transport around the factory.
3. Where sorting and inspection is necessary, the following precautions should be taken:
 - Carry out the sorting / inspection in a designated area, using dedicated equipment.
 - Staff carrying out inspection and sorting must wash their hands after sorting has taken place.
4. QC Control room is separate for bar production line from other line.

5. Transfer into production.

Transfer of decanted material in tubs and containers by hand, on wheels or by mechanical means (e.g. pallet truck)

1. Dedicated and clearly labeled containers should be used for allergenic materials. Labels must be clear and adhere well so as not to present a foreign body risk.
2. Containers must be lidded or effectively covered to prevent any spillage.
3. If containers of ingredients are retained in production areas for future use, they must be lidded or covered at all times and clearly labeled. These materials should be stored in clearly designated areas and separated from other ingredients.
4. Because of the same entrance door for date paste and cereal bar raw materials, we will not produce both of the products in the same time.
- 5- The outer wall of the rock pellets in cereal bar production line is colored with different color to other production lines.
- 6- pallets and baskets in cereal bar production line is different (by color coding) from other production lines.



Allergen management policy

In weighed / batched up lots (in small bags)

1. Bagged weighed up batches must be fully sealed and clearly labelled.
2. Bags must be protected from damage during transport. For example, it may be necessary to place the sealed bags into a plastic container.
3. Empty bags must be removed immediately and disposed of after use.

Production

Use of dedicated equipment

1. Where allergenic ingredients are being handled, dedicated production areas, lines and associated equipment should be used in order to achieve effective segregation.
2. Where allergenic ingredients are used, technical instrument box should be specified with other color.
2. If providing dedicated production areas/lines, is not practical and/or necessary e.g. allergens used in majority of products manufactures on site, the following methods for segregating allergenic and non allergenic material should be implemented, dependent on individual site circumstances:
 - At all stages of production, products which include allergenic material should be scheduled for preparation and manufacture last in the production day followed by effective cleaning of all relevant equipment and associated areas.
 - In the case of continuous 24 hours/day production, or where allergenic materials are used on an ongoing basis throughout the production cycle, immediate and thorough cleaning of the area and all relevant equipment and utensils should take place after each time the allergenic materials are used.
 - Only minimal quantities of the allergenic ingredient should be brought to the production line, ingredient packaging must be subject to ongoing visual checking to ensure it is intact.
 - Empty ingredient containers must immediately be removed for cleaning.
 - Staff must wash their hands as soon as production is completed, or if they leave the designated 'allergen handling area'.
 - Staff moving between production lines/areas must ensure they do not pose a cross contamination risk.
 - Work in progress allergenic ingredients should be removed and stored in sealed / lidded containers and clearly labeled, immediately after the production run has finished.
 - Waste must be bagged, removed and disposed of immediately.
 1. Effective cleaning of the production line must be carried out after the production run to remove any cross contamination risk.

Cleaning Manufacturing Areas and Equipment

1. Thorough and effective cleaning to control allergen cross contamination risks should take place after the manufacture of allergenic materials has been completed.



Allergen management policy

2. Cleaning methods must minimise the risk of traces of allergenic material being spread to other areas or equipment e.g. use of manual methods instead of high pressure water hoses.
3. Cleaning equipment used in areas where allergenic materials have been used for production must be thoroughly cleaned immediately after cleaning is finished.
Methods for transporting cleaning equipment to minimise the risk of spreading contamination should be used.
4. Dedicated and colour coded cleaning equipment should be used.

Tray washing machines and areas

1. Tray washing standards and automatic equipment must remove all traces of allergenic material from the surface being washed. Assessments must have been carried out to prove that cleaning procedures effectively remove the allergenic material(s)

Cleaning assessment

1. The finished cleaning standard should be 'no visible debris remaining', for cleaning in connection with allergenic ingredients. This applies to product changeover and deep cleaning.
2. The effectiveness of removing traces of allergenic ingredient must be assessed through microbiological and rapid test methods (eg ATP measurement) Tests should be carried at an appropriate frequency based on:
 - Food and non food contact surfaces
 - Track record of results.

Removal of waste

1. Waste generated as a result of preparing and manufacturing allergenic ingredients must be controlled, to minimise risks of contamination to other products.
2. Effective clean as you go procedure must be followed to minimise the build up of waste.
3. Waste must be stored securely to minimise the risk of spillage.
4. Routes for the removal of waste should avoid areas where other ingredients or products are being handled.

Packing and dispatch

1. Precautions must be taken to ensure that the correct packaging is used for products containing allergenic ingredients, particularly where packaging formats for a range of products look similar. Labels must be

verified to minimise/eliminate wrong product in wrong packaging.
2. Checks that the correct packaging is being used must be conducted. These checks must only be carried out by supervisory staffs who have received full training in allergen controls.
3. Packaging issued, which include the time of issue and the line the packaging has been issued to, must be recorded.

Training

1. All staff on site should be trained. This training must include:

Ref No: QS.M.024

Date Approved: 30.03.2020

Last Revision: 09.08.2020

Version: 01



Allergen management policy

- Explanation of anaphylaxis and common food allergens.

 - The general precautions that are in place on site to prevent contamination with allergenic material.
 - Specific precautions in place that relate to individual job roles.
2. Training must be carried out for new employees (including temporary staff) before they start work for the first time. The training programme should be rolled out based on risk assessment.
 3. Supervisory staff should be given specific responsibility for ensuring that staff teams comply with procedures they have been trained against.
 4. Refresher training should be repeated at least every 2 years, and if staff demonstrate lack of understanding at any time.
 5. All training must be fully documented.

Visitors and contractors

1. Contractors and visitors must be made aware of the issue of anaphylaxis and that allergenic materials handled on the site are subject to controls.
2. Records confirming that briefing has been completed must be maintained for all visitors and contractors.
3. Visitors and contractors must be supervised as necessary to ensure they fully comply with company allergen policy and procedures. Where contractors are unsupervised, they must be fully briefed on the allergen control procedures.

MONITORING:

Regular audits / inspections of manufacturing areas and controls must be in place to ensure that procedures are effective and working.

VERIFICATION AND RECORD KEEPING:

Regular audits / inspections of manufacturing areas and controls must be in place to ensure that procedures are effective and working.

Internal audits records must be completed, which will include:

- non-conformances
- corrective action
- responsibility
- date of completion

RECORDS APPLIED TO THIS PROCEDURE:

- Internal Audit records(QS.F.006, QS.F.104)
- Allergen risk assessment(QS.R.003)
- Hygiene and Housekeeping records



Allergen management policy

DOCUMENTATION RETENTION:

The records applied to this procedure are to be kept on file for a minimum of 3 years.