



FOOD SAFETY & QUALITY ASSURANCE POLICY

OWN BRANDS ALLERGEN AND FOOD INTOLERANCE MINIMUM SUPPLIER REQUIREMENTS	APPROVAL V.P. of Food Safety & Quality Assurance Jerry Noland	DOCUMENT NUMBER 8020_1360
	APPROVAL Director, QA, Retail & Own Brands Marlowe Dias	DATE ISSUED Nov 21, 2022
AUTHORIZED FOR USE AT/BY OWN BRANDS FSQA, OWN BRANDS SUPPLIERS	ISSUED BY Director, QA, Retail & Own Brands Marlowe Dias	SUPERSEDES May 07, 2021

I. PURPOSE

To provide supplier allergen facility program minimum requirements

II. RESPONSIBILITY

Supplier shall have robust programs and well documented preventive controls for the defined hazard

III. DEFINITIONS

Major Food Allergens: Food allergy is an abnormal response to food triggered by the body's immune system. Allergic reactions to food can sometimes cause serious illness and death. The food items that most often trigger allergic reactions and are required to be declared under FALCP are: Peanuts, Tree Nuts, Soybeans, Milk, Fish, Crustaceans, and Eggs in the US and Peanuts, Tree Nuts, Soybeans, Milk, Seafood (shellfish, fish, and crustaceans), Eggs, Sesame, Sulphites, and Mustard in Canada.

Severe Intolerances Food intolerance is a food sensitivity that does not involve the individual's immune system. Unlike food allergies, or chemical sensitivities, where a small amount of food can cause a reaction, it generally takes a more normal sized portion to produce symptoms of food intolerance.

IV. PROCEDURE/REQUIREMENTS

All facilities producing products designed for human consumption must have documented functioning allergen programs designed to prevent the undeclared inclusion of any of the following ingredient groups:

1. Product Groups requiring control and an Allergen Advisory Statement if included in the product:
 - 1.1 Allergens Recognized in North America
 - ✓ Peanuts
 - ✓ Tree nuts
 - ✓ Soybeans
 - ✓ Milk
 - ✓ Fish
 - ✓ Shellfish (Crustaceans): US, Shellfish (Crustaceans and Mollusks): Canada
 - ✓ Eggs
 - ✓ Wheat
 - ✓ Sesame
 - 1.2 Product Groups requiring Label Declaration in the US (due to possible Severe Intolerances/Sensitivities):
 - ✓ Sulfites (≥10 ppm)
 - ✓ FD&C #5 (Tartrazine)

2. Establishment of an **Effective Allergen Program must address the following area:**
 - 2.1 Thorough ingredient and process step hazard assessment to identify all allergens and allergen-containing materials that are likely to occur
 - 2.2 Effective assignment of preventive control(s) to ingredient or process steps or both based on risk assessment of identified hazards from 2.1
 - 2.3 Risk assessment of potential allergen hazard(s) at process step must consider:
 - 2.4 Approving supplier without reviewing allergen control program
 - 2.5 Formulation Control (lack of formulation change review posing higher risk)
 - 2.6 Proximity to other lines
 - 2.7 Shared equipment or tools
 - 2.8 Employee behavior
 - 2.9 Common handling tools or devices
 - 2.10 Scheduling practices (scheduling a product containing allergens prior to a product containing no allergens posing higher risk)
 - 2.11 Plant traffic flow in general
 - 2.12 Supplier monitoring (both raw material allergen label and supplier allergen control program)
 - 2.13 Color-coding systems for utensils used with allergens
 - 2.14 Production scheduling
 - 2.15 Sanitation assessment to verify the effectiveness of all cleaning procedures
 - 2.16 Use of rework
 - 2.17 Written procedure for reviewing and approving all formulation changes, label changes, new product introductions and equipment changes, including sign-off by the person that is in charge of allergen control and communication with Own Brands FSQA
 - 2.18 Employee training to occur on a frequent basis to ensure employees are aware of allergens and the risk of cross contact.
 - 2.19 Strict line changeover process
 - 2.20 Evaluation of program effectiveness
 - 2.21 Allergen audit program at least once a month for a facility that handles more than 1 allergen
 - 2.22 Allergen residue testing program if 2 products with different allergen profiles can be produced from the same line
 - 2.23 Documentation and documentation review of activities
 - 2.24 Verification program including verification of required procedures at frequencies identified in the risk assessments as well as allergen control system audits
3. A facility that uses **XXX allergen free claim** must enforce the complete line changeover process in addition to complying with the policy described here. It must include but is not limited to:
 - 3.1 100% dedicated Personal Protective Equipment (PPE) and tools
 - 3.2 Complete removal of dedicated PPE and tools from the line after use, cleaning and covering after use
 - 3.3 Dedicated storage space for PPE and tools
 - 3.4 Testing to verify that the level of residual protein on food contact surface(s) is less than 5 ppm before switching over to producing or packing the new line
 - 3.5 Testing to verify that there is no detectable amount of residual protein of a free claim in the finished product prior to release (100% positive release)
 - 3.6 Written notification of test results to be sent to FSQA Manager prior to releasing the products to Albertsons including:
 - 3.6.1 Product name
 - 3.6.2 Product UPC

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- 3.6.3 Lot code and best if used by date code
- 3.6.4 Line number or production room number
- 3.6.5 Total number of units or cases produced
- 3.6.6 Total number of units or cases tested for (unit must match the one for 3.6.5)
- 3.6.7 Allergen(s) that is tested for
- 3.6.8 Testing method
- 3.6.9 Test results
- 3.6.10 Confirmation statement on company letterhead with the label claim (XXX free) being fully compliant with all applicable federal labeling laws, if corroborated

4. **Best practices include but are not limited to:**
- ✓ Color-coded containers, scoops, shovels, etc.
 - ✓ Color-coded uniforms for plant departments
 - ✓ Use of vinyl instead of latex gloves
 - ✓ Changeover inspection sheets
 - ✓ Physical separation of lines
 - ✓ Air circulation studies
 - ✓ Controlled storage

V. DOCUMENTATION

Documentation demonstrating conformance to the established allergen program must be available upon request, accurate and up-to-date

VI. REFERENCES

1. [FDA Allergen Labeling and Consumer Protection Act](#)
2. [FDA Food Labeling Guide](#)

CHANGE LOG:

DATE	SECTION	CHANGE	REASON	CHANGED BY
7/13/12	All	Add decision tree for Allergen Advisory Statement	Conform to new format	B. Fournier, L. Ngo, C. Enlow
10/09/12	VII	Added additional links for Canada	Conform to Canada	M. Dias
06/11/13	V	Added communication with Safeway QA	Updates in Process	L. Peymandoust
02/06/15	All	Update logo, update personnel titles, change Consumer Brands to Own Brands, change Safeway to Albertsons/Safeway	Merger of Albertsons/Safeway	B.Fournier, L. Ngo
4/14/19	All	Update logo, add referencing laws, clarify and add definitions, add requirements for a supplier that wishes to use XXX allergen free claim	Conform to the most up to date regulations, reflecting current practices	Minyoung Cha
11/21/22	IV	Updated due to sesame	FDA Regulation	M. Dias