Global Standard for Packaging Materials Issue 6

P617: Position Statement Allergen Management Control

Document Scope

Food contact and hygiene sensitive products

Change log

Version no.	Date	Description
	20/11/2020	Introduction of a new supplementary requirement to section 5 Product and Process Control, new clause 5.11 Allergen Management Control
	26/11/2020	Revised following consultation with TAC and CBs
1	30/11/2020	Final version
2	08/01/2021	Updated to include a statement of intent and align with interpretation guidelines

Introduction

An allergen is a known component which causes physiological reactions due to an immunological response (BRCGS glossary)

Food laws in various countries identify and publish food allergens that need to be declared to food businesses in the supply chain and to the consumer through appropriate and accurate labelling. [1]

There are also a number of materials used in packaging materials which are derived from allergens such as rubber latex, some types of paperboard and plastic packaging may contain soy-derived glues or resins, wheat-derived starches or casein-derived coatings, additives. Latex is used in many types of food packaging materials, including rubber bands, meat netting, stickers found on some fruit and vegetables and the adhesive used for cold sealing of confectionary

In food and non-food applications some packaging materials may be encapsulated with fragrances (scents) for masking or marketing purposes.[1] Fragrances delivered in various plastic parts are being used in stores to create a mood and/or bring products to the consumers' attention, particularly in food and beverage packaging. Masking unpleasant odours in applications such as dust bin bags or household chemical containers is also an area where fragrances are utilised. For example, in PVC, fragrances are used to cover the smell of sulphur-based stabilisers. Some fragrances may contain fragrance allergenic or sensitising ingredients.

Background

The Global Standard for Packaging Materials is a GFSI benchmarked Standard and this adds to the value of certification for sites that have achieved certification and assurance of compliance to their customers. The GFSI benchmarking requirements have been updated to include a requirement for an allergen management plan to be established, implemented, and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.

The following supplementary requirements shall apply and be included within all audits commencing 1st July 2021.

Supplementary Requirements

5.11	**Allergen Management**
	The site shall have a documented procedure to identify allergenic materials and potential routes for contamination, and based on risk, establish an effective allergen management plan

5.11.1	The site shall carry out an assessment to establish the presence and likelihood of allergenic materials and contamination by allergens. The assessment shall include raw materials as virgin and recycled formats, intermediate and finished products, processing chemicals, inks, solvents, and traded products. This assessment shall form part of the documented HARA as detailed in clause 2.2.6 of the Standard
5.11.2	Where allergens have been identified as part of the hazard analysis and risk assessment, the routes for contamination from incoming goods to storage and dispatch shall be identified and documented policies and procedures for handling such materials to avoid cross contamination (cross-contact) shall be established.
5.11.3	the site shall establish, implement, and maintain a plan for the management of allergens to minimise or eliminate the risk of contamination to the packaging and meet legal requirements for labelling in the country of sale. The plan shall be reviewed based on risk.

Interpretation

The Standard adequately addresses items containing potential allergens such as food or non-food items brought in or made on site. Food and beverage or cigarettes brought on to site by staff, visitors and contractors shall not be taken into storage or production areas or consumed in the locker and changing rooms. (Clause 6.3)

An Allergen Management Plan is a documented system that serves to identify, control, educate and communicate the risk and presence of allergens on the site, from raw materials through to finished products. It defines the policies and procedures for managing allergens within the site and at a minimum, the plan will include:

HARA

A detailed assessment as part of the documented HARA (refer to clause 5.11.2 above)

The Cleaning Process

Any areas or equipment that may be cross contaminated with allergens may require specific cleaning procedures which is adequately covered by the Standard in clause 4.8. As for routine cleaning procedures, the specific cleaning procedures shall be validated, verified and records of checks documented.

Segregation procedures

Any products identified as containing allergens should be stored and handled in such a way as to minimise the potential to contaminate materials that do not contain them. Measures to consider include physical segregation; the use of separate protective clothing and equipment when handing allergenic material; segregation; waste handling and spillage controls. This is covered by the Standard in clause 5.9.1.

Product labelling

The presence of allergens needs to be communicated to customers and may be subject to legislative requirements in the country of sale. The accuracy of labels and communication is paramount. Additionally, where a site is responsible for the manufacture of printed materials such as labels, it will require processes to ensure the accuracy and legality of the material. This is covered by the Standard in clause 7.4.1.

The allergen management plan shall be **reviewed** as necessary including when

- There is a change to raw materials or suppliers
- There is a change in the manufacturing process
- There has been an introduction of new machinery
- There is a change to cleaning practices and procedures

If the site determines that food contact packaging materials and/or articles may contain an allergen identified in law, it has the responsibility to disclose the presence of the allergen to customers, who will make the final decision on final product labelling for consumers.

[1] Useful references

https://www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses

https://www.fda.gov/food/food-labeling-nutrition/food-allergies

https://ec.europa.eu/jrc/en/publication/articles-journals/allergens-foods

https://www.fda.gov/cosmetics/cosmetic-ingredients/allergens-cosmetics

The paragraph 49 of Regulation 1223/2009