

1.0 Purpose

Panificio Italiano has developed detailed processes for the management of allergens in its product range. Presently, there are three allergens handled onsite

1. Wheat Gluten handled at site and it is present in all the products produced at Panificio Italiano. Therefore, no specific controls are required.
2. Egg (Pasteurised egg)
3. Milk (Milk Powder and Butter)

The evaluation has been completed through a detailed risk assessment which accounts for raw material, interim product and finished product contamination risks at each stage within the Panificio Italiano process and physical location within the Panificio Italiano facility. An allergen management plan has been developed to manage the identified cross contamination risks as far as is practical to avoid the need for alibi labelling where possible. The allergen controls implemented and required alibi labelling together, shall ensure maintenance of product safety and quality with customer confidence and satisfaction.

In the event of an allergenic material spillage, the process steps at the end of this document must be followed.

2.0 Scope

The allergens covered by the scope of this document are: Ground Nuts, Tree Nuts, Sesame, Milk, Eggs, Soya, Fish, Shellfish (Crustaceans), Molluscs, Wheat, Rye, Barley, Oats, Spelt, Kamut, Mustard, Celery, Lupins, Sulphites and any derivatives thereof.

Panificio Italiano currently uses following allergens:

- Wheat gluten
- Milk (Milk Powder & Butter)
- Egg

Panificio Italiano does not intend to manufacture any product without Wheat gluten, all products contain wheat flour. Therefore, for the purposes of allergen management Wheat Gluten are not considered as requiring specific control. Although site handles Milk and Egg, controls are put in place to prevent contamination. The site is nut free and staff (including agency staff) are notified during induction training. The business does not manufacture products carrying specific provenance claims or produce products with organic claims. The business does not procure raw materials containing genetically modified material.

The procedure applies from supplier management through to goods acceptance to finished product dispatch.

3.0 Responsibility

The Head of Technical is responsible for the implementation and maintenance of this procedure and training of its content, as appropriate. All employees of Panificio Italiano (including those managing visitors/contractors) and agency staff are responsible for meeting the requirements of this procedure.

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4.0 Procedure

4.1 Risk Assessment

Detailed Allergen risk assessment must be carried out. The allergen risk assessment shall be completed in two parts.

- **Part One** is the baseline risk assessment required in order to implement effective management controls and establish alibi labelling requirements.
- **Part Two** is an aspirational standard whereby risks are further quantified, allowing the established management controls to be further refined. Part Two shall be implemented within Panificio Italiano at a timescale to be agreed by the Senior Management Team.
 - ✓ PART ONE is designed to understand product cross contamination risks in each factory area and develop a robust action plan to minimise risks wherever possible.
 - ✓ PART TWO is designed to understand the identified risks in detail by examining likelihoods of contamination and quantities used in order to determine if alibi labelling for the allergen(s) of concern is required or whether risks can be adequately managed.

PART ONE:

STEP 1: Allergens Analysis by Product

To establish which products are potentially at risk of contamination from other allergens and what form these allergens take

- Create a spreadsheet listing all products down the left hand column and all possible allergens, as defined in the scope of this procedure, across the top row.
- For each product, indicate if the product contains the allergen as an intentional ingredient.
- Intentionally contains allergen: type in the form that that the allergen takes and colour the cell green.
- Does not contain allergen: colour the cell red.

STEP 2: Allergens Present by Area

To establish which allergens are present in each area and which finished products are at risk from each allergen.

- Create a new spreadsheet with the following columns ('area' columns: list each specific area of factory - enclosed and open product areas):
 - Product Group
 - Allergen of Concern
 - Products At Risk (does not contain this allergen as an intentional ingredient)
 - Area columns
- For the entire Panificio Italiano product range, define product groups according production equipment and areas in the factory where product is processed.
- Referring to the 'analysis by product' spread sheet in Step 1, for each product group, list the first target 'allergen of concern'. List the products within the product group which do not contain the target allergen. These are the 'products at risk' which need to be protected.
- For each product at risk, consider whether its ingredients, interim products or open finished products are present in each of the factory areas listed across the top. This will identify area in the factory where those particular products could be at risk of contamination if allergenic materials are also present in that area. Consider the relative risks of the allergen formats e.g. powders, solids etc and ingredients of products in the immediate surrounding areas which may also contain the allergen of concern.
 - Complete risk assessment as follows:
 - Allergens present with ingredients, interim products or open finished products for product at risk and risk of contamination is probable - colour the box **red and briefly describe what the risk is**

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- Allergens present with ingredients, interim products or open finished products for product at risk and risk of contamination remote - colour the box **amber** and **briefly describe what the risk is**
- Allergen not present or no perceived risk of cross contamination colour the box **grey**
- Repeat the assessment for each allergen of concern and product group combination until the spreadsheet is fully populated

STEP 3: Factory Verification

To establish that the risks identified through risk assessment are correct and to determine what protection measures are required to prevent allergen contamination in each area.

- Take a copy of the 'Allergens present by Area' spreadsheet into the factory.
- Walk through each area and associated lines/ equipment in turn, preferably whilst typical production is running. Consider the allergenic ingredients present in the area, and what if any risk they pose to the product which must be protected. Make detailed notes of perceived risk and action required. If the area/ lines is used for multiple product groups/ types, ensure the verification includes assessment of during production of each.

STEP 4: Create an Allergens Action Plan

To establish the corrective actions and additional management procedures required to prevent allergens cross contamination in each area.

- Write up recommended actions into a final 'Action Plan' spreadsheet
- List actions by factory area on this spreadsheet
- Adjust the colour coding of any perceived risks on the Allergens present by Area spreadsheet, if the assessment of risk has changed based on the factory floor verification
- Sense check that the actions defined are practical and achievable

PART TWO:

STEP 5: Allergen Risk Rating by Area

To establish the relative risk of allergen contamination considering the likelihood of an allergen contaminating other materials and the quantity used in the area.

- To be used for all red and amber identified risks from the Allergens by Area assessment
- Create a new spreadsheet with the following columns (risk ratings 1-3 for both likelihood and quantity):

AREA	LIKELIHOOD REASON	SCORE	QUANTITY USED	SCORE	OVERALL SCORE (LIKELIHOOD X QUANTITY)	CURRENT CONTROLS	ACTION
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- Likelihood: 1 Unlikely, 2 Could Occur, 3 Almost Certain
- Quantity: 1 Low levels used, 2 Medium or Variable levels used, 3 High levels used - quantify usage per day/ shift if possible
- Colour code each overall score: < 3 **GREEN**, 3-4 **AMBER**, > 4 **RED**
- Detail current controls in place and further action which could be taken to reduce the risks identified

STEP 6: Risk quantification

To establish detailed information relating to worst case risk of levels of allergenic protein contamination in each area of concern.

- For areas deemed as amber or red overall contamination risks, create the following spreadsheet:

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AREA	COMMENTS	ALLERGENS PRESENT	HIGHEST % OF ALLERGEN PRESENT	% OF PROTEIN WITHIN THE ALLERGEN
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- Based on recipes or composition of materials, for the materials present in the area containing a specific allergen, calculate the percentage of the allergen within the material/ recipe that is the highest for the area of concern
- Using reference tables, calculate the actual percentage of allergenic protein within the material/ recipe that has the highest % of the allergen of concern
- This information can then be used to further refine the action plan and form the basis for discussion of appropriate alibi labelling (or not) for own brand and customer branded products.

4.2 Factory Controls by Area

As defined within the risk assessment, certain areas of the factory/ storage shall be required to implement specific controls. These are summarised in the table below.

Storage	Good practice only: storage of milk-containing materials in labelled, segregated areas. All products to be fully sealed or re-sealed to prevent ingress or spillage of other materials. Ensure signage in storage is clear
Main Chiller	Good practice only: storage of egg and milk-containing materials in labelled, segregated areas. Ensure signage in storage is clear
Mixing Room	Milk and Egg containing materials to be stored in segregated, labelled areas.
Dough Mixers	There is a dedicated mixer for allergen products.
Production	There is a dedicated line for allergen products. All staff are wearing red aprons on top of white coat whilst handling allergens.
Baking Trays / Racks	Silicon paper is being used for all allergen products to prevent coming in direct contact with baking tray. No mixed racks and minor/ major spillages cleared as per procedure.
Prover	No mixed racks and minor/ major spillages cleared as per procedure.
Ovens	No mixed products (Product containing allergen and non-allergen products) baked in the same oven and minor/ major spillages cleared as per procedure.
Slicers flow-wrapper, turntable, bulk metal detector	Recorded line/ area clearance checks in place to verify hygiene standards prior to packing a new product line. Ad hoc QA checks throughout the day. Implementation of both spillage and clean as you go procedures.
Whole Factory	Minor spillages to be cleaned up using disposable cloths with hot water/ detergent mix. Disposable Saniwipes can be used as a quick reaction. If next production in area/ on equipment or if there is other non-allergen containing production occurring at the time in the same discrete area, then cleaning to be verified by QA - visual inspection and ATP swabs with pass rate < 100 and allergens swabs. Major spillages to be cleaned as per spillage procedure defined in Allergen Management Procedure.

4.3 Colour Coding: Utensils, Containers & PPE

- Decanted solid or powdered material is decanted into labelled lidded containers if required to be stored in the containers. Scoops used and interim mixing containers are cleaned after use and clean dry containers, utensils and scoops are obtained prior to manufacturing a product containing different allergens to the previous product.
- The red colour PPE shall be used while handling allergen. Aprons and gloves to be disposed of immediately after use and hand washed and sanitised before starting another product.
- Dedicated equipment e.g. trays / racks can be considered based on the risk assessment.

4.4 New Product Development considerations

- Products containing new allergens to site apart from egg, milk, wheat flour (gluten) must be carefully considered through both the HACCP and Allergen Risk Assessment prior to any product trials within the factory. Avoid introducing new allergens wherever possible.
- Any new product containing allergens other than Wheat Gluten must be considered against both the HACCP and Allergen Risk Assessment prior to any product trials to establish if the allergen is new to the area/ equipment and therefore additional management controls may be required.
- Any products which intend to carry 'free from', specific provenance or organic claims must be considered against both the HACCP and Allergen Risk Assessment prior to any product trials. Consideration must also be given to additional accreditation requirements, production segregation and fabrication changes, production planning and additional product testing.

4.5 Allergen Production Cleaning

- Full hygiene and production cleaning methods have been validated using post-cleaning hygiene ATP swabbing as per standard hygiene procedure.
- Additional verification test can be considered e.g. egg protein swabs if deemed necessary.

4.6 Production Planning

- No specific production planning is required based on the current situation. There are separate dedicated equipment being used for allergenic products.

4.7 Supplier Management

- Information in the form of Self Audit Questionnaires and Accreditation certificates are held for each supplier (master copies either at Panificio Italiano or if purchased through Heathrow Bakery, in Heathrow Bakery files).
- Suppliers provide specification documents for all raw materials and interim products brought onto the Panificio Italiano site. The spec is examined by Technical Services Manager prior to taking delivery of a new material and the spec is filed to signify acceptance of the information. Specs include ingredients, allergens and potential allergen cross contamination risks.

4.8 Engineering

- Engineers are required to wear disposable overalls whilst completing work within the factory and storage areas. Wherever possible, engineering shall take place outside of production hours.
- If engineering is required during production and in areas/ on equipment handling allergens, cleaned tools must be used which are then cleaned and sanitised after contact with contaminated surfaces. Disposable overalls must always be removed after each engineering job is completed.

4.9 Site Rules, Staff and Visitor Controls

- Site rules clearly state that nuts are not to be brought on site. This is purely to stop staff / visitors / contractors bringing nuts e.g. groundnuts, walnuts etc.
- Staff canteen and food brought from home must not contain nuts.
- Visitors: have to confirm on declaration that they are not carrying nuts or products containing nuts.

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- Personnel are allowed to bring products to site that carry an alibi warning statement for nuts or peanuts e.g. 'may contain peanuts' but not present as an intentional ingredient.

4.10 Staff Training

- Allergen awareness is included as part of staff induction training.

4.11 Alibi Labelling

- No alibi labelling required.

4.12 Line Clearance

- Equipment and the general environment within product packing shall be subject to a documented clearance between product packing runs. A clean down of food contact surfaces and any environmental debris must be made and all packaging from the previous run cleared before the next run is permitted to commence. This clearance process must be verified and counter-signed on packing records before the next run commences.
- For packaged products, a copy of the start and end labels plus sample of first label from any reel change during packing must be retained and attached to the packing record for label verification to be completed. A positive sign-off to verify that the label and printed information is correct must be completed on the packing record.

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