

# Stay Flexible and Stay With It: Implementing Allergen Controls

Tennessee Food Safety Task Force  
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Allergens remain a risk today for  
consumers of processed food

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Industry continues to work  
toward effective allergen  
controls

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Lack of allergen management  
still accounts for many product  
recalls

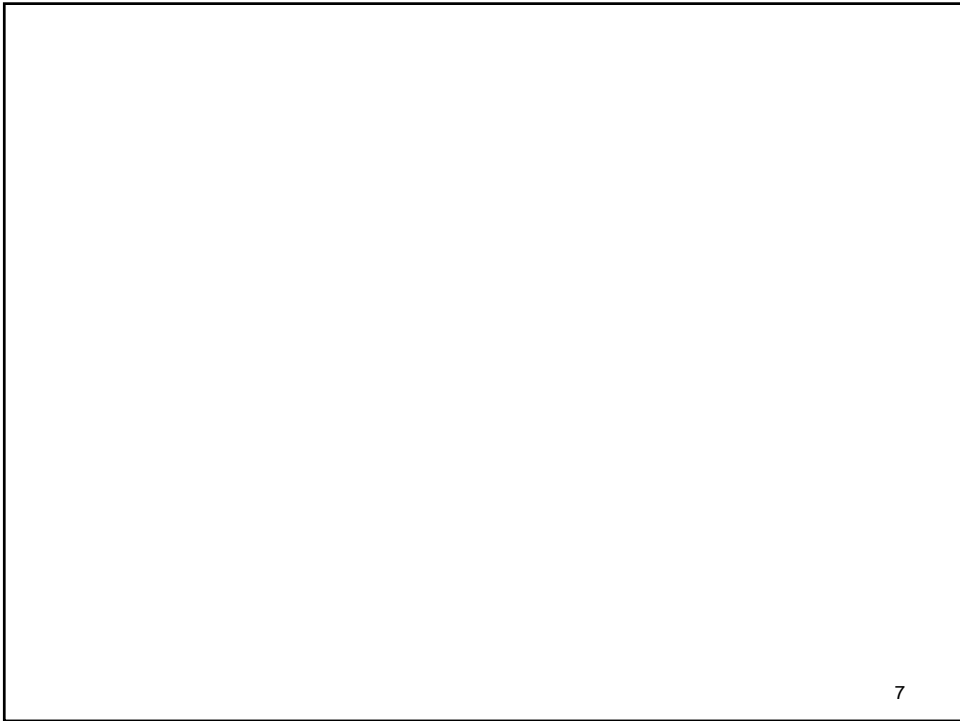
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Risk from allergens is lower and  
effective controls can be  
achieved

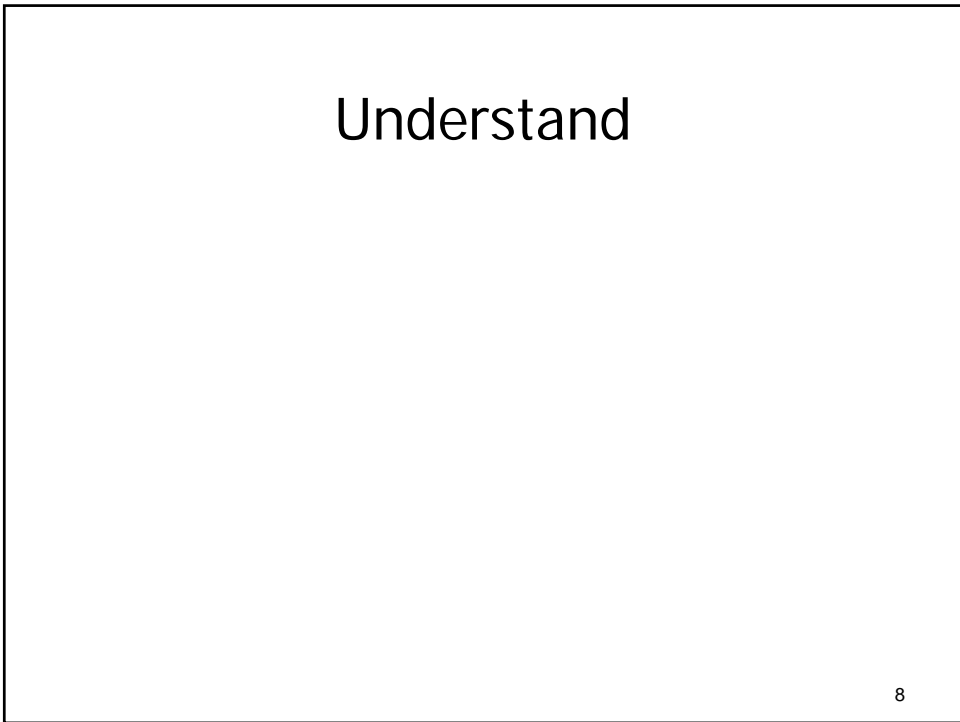
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Understand, communicate and  
evolve to achieve consumer  
allergen safety .

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Understand

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Allergens are different than  
traditional food safety issues

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traditional food safety issues

- We intentionally put allergens in products

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## Allergens are different than traditional food safety issues

- We intentionally put allergens in products
- Allergens may be in large quantities

11

## Allergens are different than traditional food safety issues

- We intentionally put allergens in products
- Allergens may be in large quantities
- Cautionary Labeling Use

12

## Risk assessment is difficult

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- Little data available on allergenic reactions to processed foods

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- How much process control is enough?

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## Risk assessment is difficult

- Little data available on allergenic reactions to processed foods
- How much process control is enough?
- Susceptible consumers make decisions that may influence outcomes

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Historical GMPs/SOPs are probably inadequate

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- Extending current practices often doesn't work

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## Historical GMPs/SOPs are probably inadequate

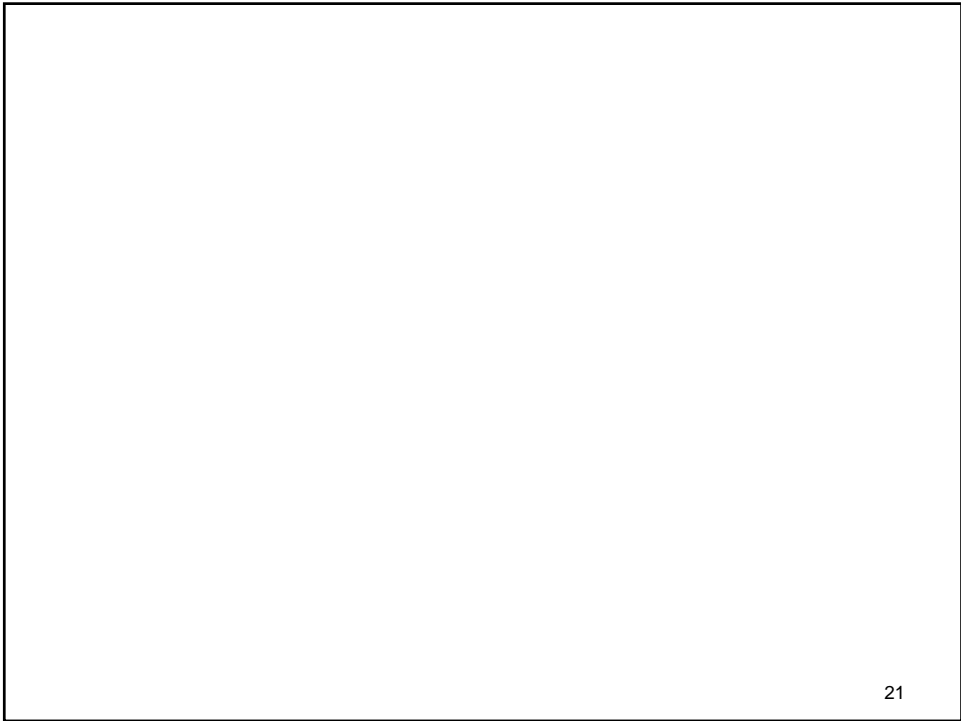
- Extending current practices often doesn't work
- Many processes were not designed to do allergen changeovers

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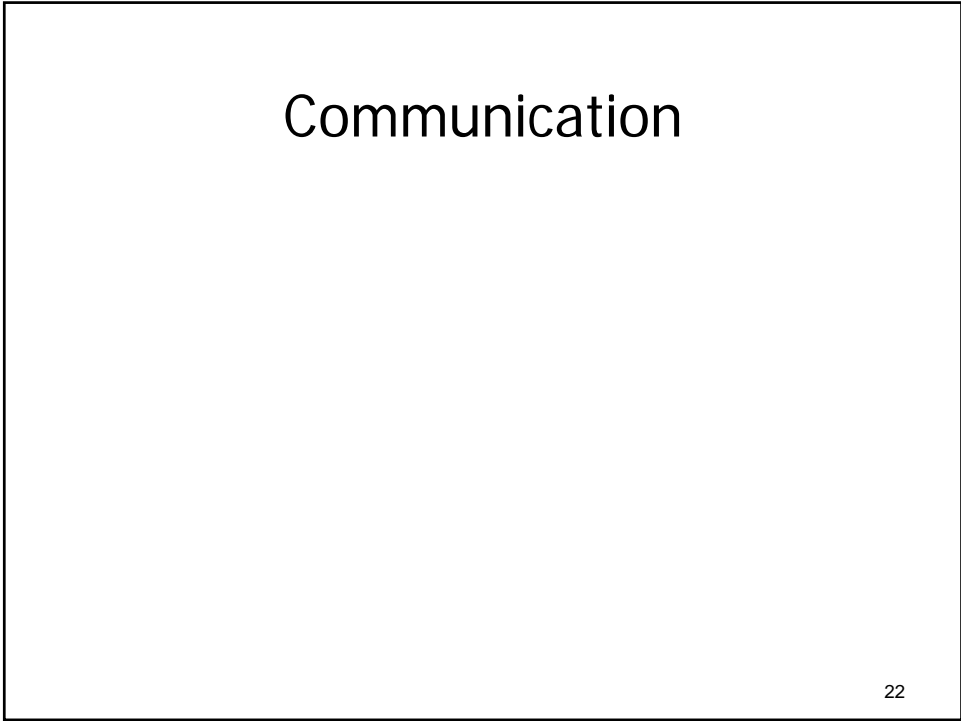
## Historical GMPs/SOPs are probably inadequate

- Extending current practices often doesn't work
- Many processes were not designed to do allergen changeovers
- Allergen controls may dramatically change the way you operate your business

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Communication

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Education is the first step

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Education is the first step

- The “driver(s)”

24

## Education is the first step

- The “driver(s)”
- Management

25

## Education is the first step

- The “driver(s)”
- Management
- Employees

26

Keep officers/owners appraised

27

Keep officers/owners appraised

- They want to know

28

## Keep officers/owners apprised

- They want to know
- They think everything is fine unless told otherwise

29

## Keep officers/owners apprised

- They want to know
- They think everything is fine unless told otherwise
- You need them

30

## Communication loose ends

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## Communication loose ends

- New employees

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## Communication loose ends

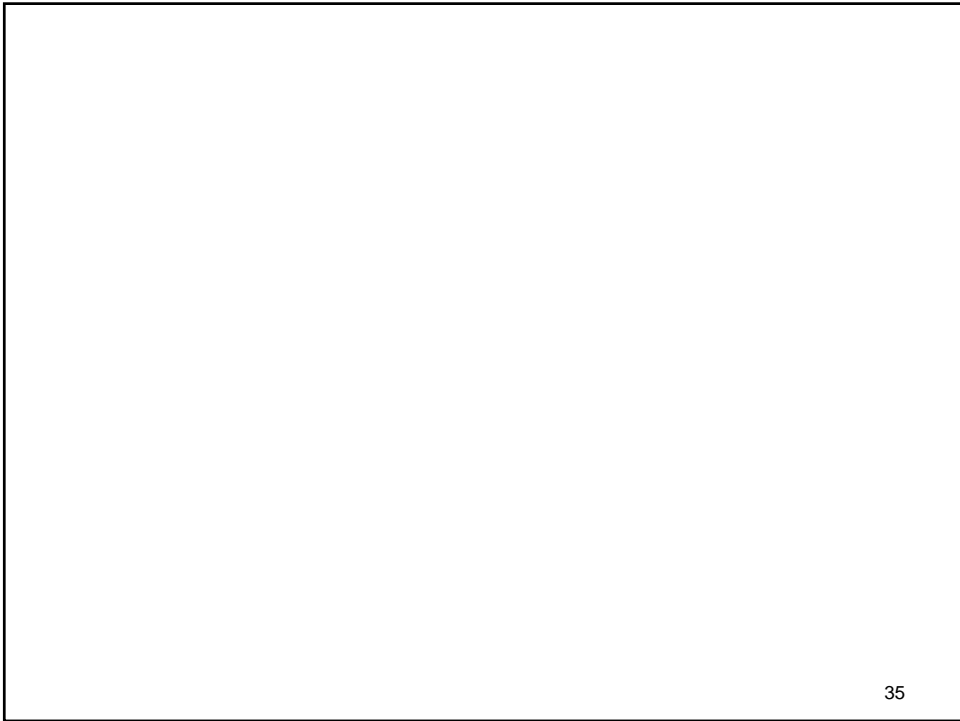
- New employees
- Outlying departments

33

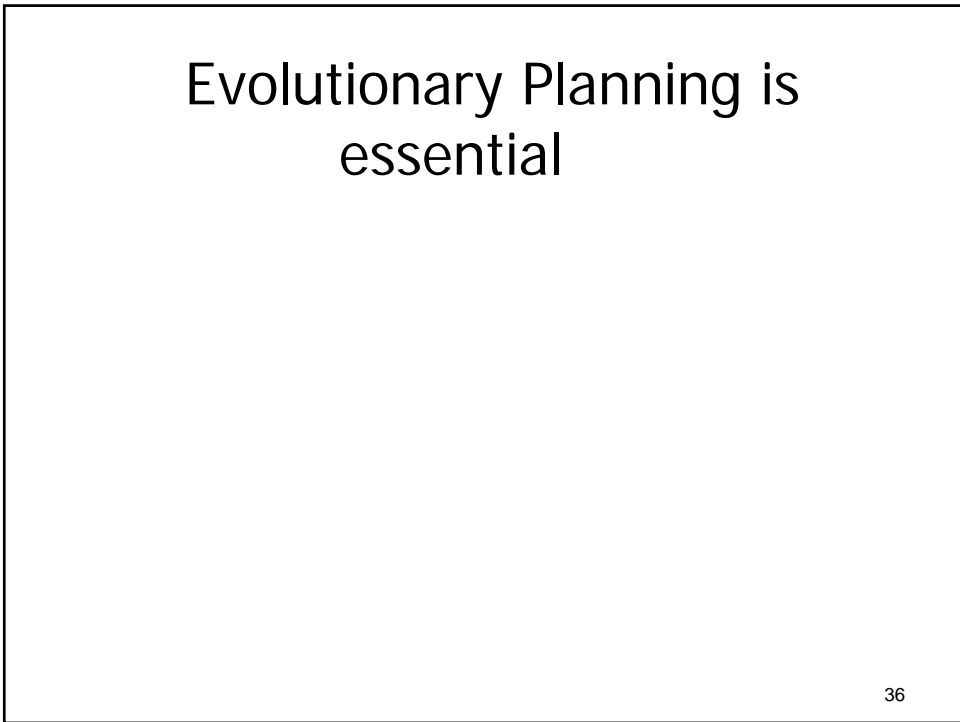
## Communication loose ends

- New employees
- Outlying departments
- New information

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Evolutionary Planning is  
essential

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## Line Cleaning/changeovers

- Changeovers to a visual standard

37

## Line Cleaning/changeovers

- Changeovers to a visual standard
- Formulation

38

## Line Cleaning/changeovers

- Changeovers to a visual standard
- Formulation
- Packaging material controls

39

## Verification and Validation

40

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- Inspections

41

## Verification and Validation

- Inspections
- Swab cleaned surfaces

42

## Verification and Validation

- Inspections
- Swab cleaned surfaces
- First product out testing

43

## Follow-up and adjust

44

## Follow-up and adjust

- Modify equipment

45

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- Modify equipment
- Audits/repeat validation – new set of eyes

46

## Follow-up and adjust

- Modify equipment
- Audits/repeat validation – new set of eyes
- Revisit dedications

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Will we ever find true  
happiness with our allergen  
control procedures?

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Not all of us can say we are  
where we ultimately want to be

50

Understand, communicate and  
evolve our plans

51

Stay flexible and stay with it

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We will insure allergens are not  
a danger in our products

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We will be successful in our  
journey for allergen consumer  
safety

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