



QP6 Company Allergen Handling Policy

Presence of Allergens on Site

The company engages in the batch manufacturing of tailored flavourings made to customer order. Raw materials are acquired to meet customer individual orders and high-risk allergens (peanut and peanut analogues) are not permitted on site.

The site is not free of low-risk allergens or highly processed derivative oils and has developed appropriate identification and controls of the risk of accidental cross-contamination.

The site handles the following allergens (as listed in Regulation EU 1169/2011 Annex II) from time to time due to the bespoke nature of product design:

- Cereals containing gluten and products thereof
 - pure processed oat fibre (<10ppm gluten)
 - Malt extracts
- Nuts and products thereof
 - Bitter Almond Oil (>99% Benzaldehyde by GC)
 - Organic Sweet Almond Oil (fixed oil)
- Celery and products thereof
 - Celery Seed Oil (steam distilled)
- Mustard and products thereof
 - Mustard Seed Oil (>95% Allyl Isothiocyanate by GC)
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total SO₂
 - Elderflower Extract (750ppm max)
 - Red Wine Concentrate (500ppm max)

As a 'make-to-order' operation we do not inventory finished product that may contain allergenic raw material.

Register of Allergens Approved for Presence on Site

Individual raw materials approved for use on site are itemized in the Raw Materials HACCP Chart which includes an analysis of Allergen Status against Regulation EU 1169/2011. Each raw material Item Record on the Manufacturing database indicates allergen status if relevant. The status is indicated on the Manufacturing system generated documents for receipt, storage and picking for manufacture.

Highly processed refined oils and pure cereal fibre are included on the Allergen Register if derivatives of allergenic material, despite the absence of proteinaceous content, and are subject to the same handling and controls as allergens.

[Raw Materials HACCP Chart](#)
[HESF Allergen Limits.xlsx](#)

Risk Analysis & Handling Requirements

The HACCP Team conducts a risk analysis of each individual raw material. All allergens in EU 1169/2011 Annex II that may be present on site are subject to a 3x3 Risk Assessment matrix. Materials defined by the Team as high-risk are not permitted on site.



Risk Management - Production

Our manufacturing process is manual and small scale: there is no production line or automated equipment used.

Prior to the production of a batch, there is a documented equipment and utensil inspection.

After a batch is manufactured, there is a thorough wet clean down including a final solvent rinse of all equipment, utensils, and the surrounding area. The cleaning is inspected and recorded on the batch production sheet QF01. Training of Production Operatives regarding cleaning technique is validated by surface protein swabbing and recorded in the Training Record. Workwear is put out for laundry, and hands are washed before proceeding with the next production batch.

[QMP21 Cleaning of Production Equipment and Areas.docx](#)

QMP21 Cleaning Procedure - Verification and Sensitivity

The effectiveness of QMP21 is verified after each allergen-containing* batch to an upper limit sensitivity of 40 ppm protein residue and <25 ppb presence of allergens (contact surfaces and rinse water after cleaning). At the maximum dose rate of finished flavourings** (liquid) of 0.3% by weight RTC food, regulated by the Solvent Regulations, ppm is significantly lower than the Action Level 1 limits of the EU-Vital methodology based on published LOAELs (lowest observed adverse effect levels).

*Added to which the derivatives handled are low-risk and/or absent of proteinaceous material and incorporated into a **finished flavouring as minor components.

The verification method is the Neogen AccuPoint Advanced™ hygiene monitoring system providing a rapid response verification and a continuous data record.

Risk Management - Recording of Contact Production Assets

All production assets (contact with food) are uniquely identified by unique ID in the hygiene monitoring system for post batch verification, which is recorded with digital results against the batch Works Order record and transferred to a digital laboratory database by a designated trained manager. This permits a full audit of the history of each asset, and all assets in use over any period for allergen-containing production batches.

Risk Management - Storage & Handling

Low risk allergens are stored in such a way as to minimize the risk of cross-contamination (e.g., not stored over non-allergenic materials), and only handled by approved Food Handlers.

[QMP07 Handling & Storage of Materials and Packaging.docx](#)

Risk Management - Training

All Food Handlers receive allergen awareness training as part of basic training. This training is refreshed periodically. Additionally, Production Operatives receive general training in HACCP awareness, food hygiene & handling (CIEH/Highfield Level 2 for Food safety in Manufacturing) and specific training in storage, handling, process control and clean-down procedures. All food handlers are re-trained in the clean-down procedure on an annual basis validated by both ATP and/or ELISA swabs. All Production Operatives are trained in the operation of the Neogen AccuPoint Advanced™ hygiene monitoring system.

[H E Stringer Training ALLERGEN AWARENESS.ppt](#) [QF33 Training Validation Record Production Clean Down.docx](#)



Risk Management - Other Notes & Policies

Employees are not permitted to bring nuts onto site. We do not have a canteen serving food or vending machines for dispensing of food on site. Packed lunches are consumed in the canteen area, which is remote from the production area. All employees must remove work wear before entering the canteen area.

All visitors to the site are prohibited from carrying nuts on their person.

[QP5 Company Hygiene Health & Safety Policy.docx](#)

[QP7 Information for Contractors.docx](#)

[QF35 Factory Visitors Form.docx](#)