

<b>Cebro/White Oak Frozen Foods</b> <b>Newman Operation</b> <b>POLICIES AND PROCEDURES</b>	Procedure: <b>P&amp;P- 14</b>
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<b>ALLERGEN PROGRAM</b>	Revision: <b>12-5-03</b>

Cebro/White Oak Frozen Foods (CWOFF) facility does not have or use products, ingredients, aids, etc., that are allergens. However, CWOFF is aware of the need to monitor and preclude or segregate allergens. To that end, we submit our allergen policy.

**BACKGROUND**

Food allergies affect an estimated six to seven million people in the United States. Some of these sensitized consumers can develop serious or life-threatening allergic reactions if exposed to the causative proteins. Currently, here is no cure for food allergies. The only successful method to manage food allergies is to avoid foods containing the causative proteins. Accurate and informative food labeling is needed so the individuals who have food allergies can be informed of the possible presence of an allergen(s) in a food.

The Food Allergy Issues Alliance (FAIA), a group of food industry trade associations and other interested organizations, developed allergen labeling guidelines to be used by the food industry. These guidelines were designed to provide the food industry with a uniform approach in presenting allergen information on food labels. Both the Food Allergy Network and the FDA have supported these guidelines.

Since the issuance of the allergen labeling guidelines, FDA held public meetings (of which CWOFF participated) to discuss just how allergen information should be presented on the food label.

The CWOFF Allergen Labeling Program (CFF-ALP) was developed using the FAIA guidelines and comments made during FDA’s allergen meetings. The CFF-ALP is consistent with other food processors which will provide a uniform approach to assist the consumer to quickly identify which, if any, allergens are present in our products. The elements contained in this program are being adopted as new products are developed or when changes are being made to existing labels.

**A. Major Food Allergens**

The subject guidelines focus on the Major Food Allergens (MFA), which have been estimated to cause more than 90% of all food allergic reactions. These MFA’s are defined as the allergic proteins from:

1. Shellfish - Crustacean (shrimp, lobster, crab, crayfish) and Mollusks (oysters, clams, mussels, scallops).
2. Eggs
3. Tree nuts (almonds, chestnuts, pine nuts, walnuts, cashews, chestnuts, filberts/hazelnuts, macadamia nuts, pecans and pistachios)
4. Milk
5. Wheat
6. Soy
7. Fish
8. Peanuts
9. Celery

It should be noted, that for tree nuts and crustaceans **each** different type of nut or shellfish is considered a separate allergen. Therefore the use of generic terms “tree nuts” and “shellfish” in the ingredient statement will not be used.

The allergen containing foods in this list can be in various forms, e.g., natural flavors, derivatives, whole, chopped, ground, dehydrated, etc.

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An ingredient that is derived from a MFA is not subject to these guidelines when it does not contain the causative allergenic protein.

1. Example, highly refined peanut and soybean oils, have had the proteins removed and **are not considered** to be allergenic.
2. Peanut and soybean oils that are either “cold pressed oils” or are **not** highly refined **are considered** to be allergenic.
  - a. Cold pressed oils or oils not highly refined would more commonly be found in “natural” foods.

### **B. Ingredient Statements**

A food that contains an ingredient from one of the eight major food allergens will need to identify in the ingredient statement all allergens that are present in the food.

When developing or updating ingredient statements the following elements need to be included:

1. Identify all food allergens that are an ingredient or a component of an ingredient.
2. **All** allergens are to be disclosed even if it is a component of an ingredient. This includes flavors, starches, incidental additives and processing aids.
  - a. Flavors and seasonings that contain an allergen ingredient will need to identify that allergenic component. Flavors are to present allergen information in this manner.
    - i. For example, “natural peanut flavor” or, if two or more natural flavors are used then identify the allergens in this manner - “natural flavors (including milk and almond)”.
    - ii. Should an allergen not be used in a flavoring then simply state “natural flavor(s)”.
    - iii. The allergen(s) listed in the ingredient statement are to be restated in the allergen information statement at the end of the ingredient statement.
  - b. Starches and modified food starches need to be identified as to the source of the starch.
    - i. For example: wheat starch, wheat starch - modified, corn starch, modified corn starch, etc.
  - c. Incidental additives, including processing aids, that are an allergen or contain an allergen must identify the allergen in the ingredient statement.
    - i. Two examples of incidental additives would be nonfat milk and wheat starch used as a carrier for a vitamin mix.
  - d. The common or usual name of an ingredient is to be used in the ingredient statement.
    - i. Example - nonfat milk, whey, sodium caseinate, wheat flour, shrimp, etc.

### **Presenting Allergen Information on a Label**

In addition to listing each ingredient within the ingredient statement allergen information will be presented after the ingredient statement and prior to the distribution statement. The information will be in bold type with the heading

#### **Contains:...**

This format will make it easier for consumers to readily identify what allergens are present in the product. This is following the lead of many large food companies and the desires of consumers faced with food allergen concerns.

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1. All allergens identified in the ingredient statement are to be identified in the allergen information statement using terms generally understood by consumers such as **“Peanuts,” “Milk,” “Wheat,” “Soy,” Pecans,” Walnuts,” “Shrimp,” “Fish,”**.
2. When an ingredient is a derivative of a common allergen then the name of the common allergen is to be identified at the end of the ingredient statement in the allergen information sentence.
  - a. For example: if whey or sodium caseinate is listed as an ingredient, then milk would be identified as the allergen.  
*Contains: Milk*
  - b. **The following is an example of how a label may appear:**  
**Ingredients:** Beans, water, sugar, brown sugar, corn syrup, bacon (cured with water, salt, sodium phosphate, hydrolyzed soy protein, sodium erythorbate, artificial maple flavor, sodium nitrate), salt, wheat starch-modified, dextrose, spice, caramel coloring, onion powder, garlic powder, natural smoke flavor, whey, hydrolyzed soy protein, natural flavors (including milk).  
*Contains: Milk, Soy and Wheat.*
3. **Exceptions:**  
 Single ingredient products that are allergens, e.g. - milk, flour, shrimp, peanuts, etc. **or** products that have a standard of identity and are required to have enrichments added to them, e.g. - milk with vitamins A and D or enriched flour, the allergen information statement **will not** be required after the ingredient statement.

Action Steps

1. As formulas are developed or revised and an allergen of concern is identified then update the ingredient statement using the format outlined above.
2. Question CWOFF suppliers as to what allergens are or could be present in incidental additives, or processing aids. With the current food industry initiative, suppliers should be more forthcoming than in the past. We do not need to know the specific formulation, only the fact that there are allergen ingredients being used and which allergens are present.

General Information

Allergen terms include but are not limited to:

- Milk** - butter, buttermilk, casein, cheese, cottage cheese, curds, whey, lactose, caseinate, natural flavor, nonfat milk
- Eggs** - yolk, whites, albumen, natural flavor, egg lecithin
- Peanuts** - peanut flour, peanut protein, hydrolyzed peanut protein, natural flavor
- Tree Nuts** - almonds, Brazil nuts, cashews, chestnuts, filberts/hazelnuts, macadamia nuts, pecans, pine nuts, pistachios, and walnuts
- Soy** - hydrolyzed soy protein, soy flour, soy lecithin, soy protein concentrate, soy protein isolate
- Wheat** - bran, bread crumbs, farina, malt, wheat germ, wheat gluten, wheat starch, semolina
- Shellfish** - Crustacean (shrimp, lobster, crab) and Mollusks (oysters, clams, mussels, scallops)
- Fish** - fresh or saltwater finfish.

Approved By: \_\_\_\_\_  
**Chief Technical Officer**