



# Undeclared Allergen Prevention Webinar

Labeling and Program Delivery Division (LPDD)  
Office Policy and Program Development



# Big Eight Allergens

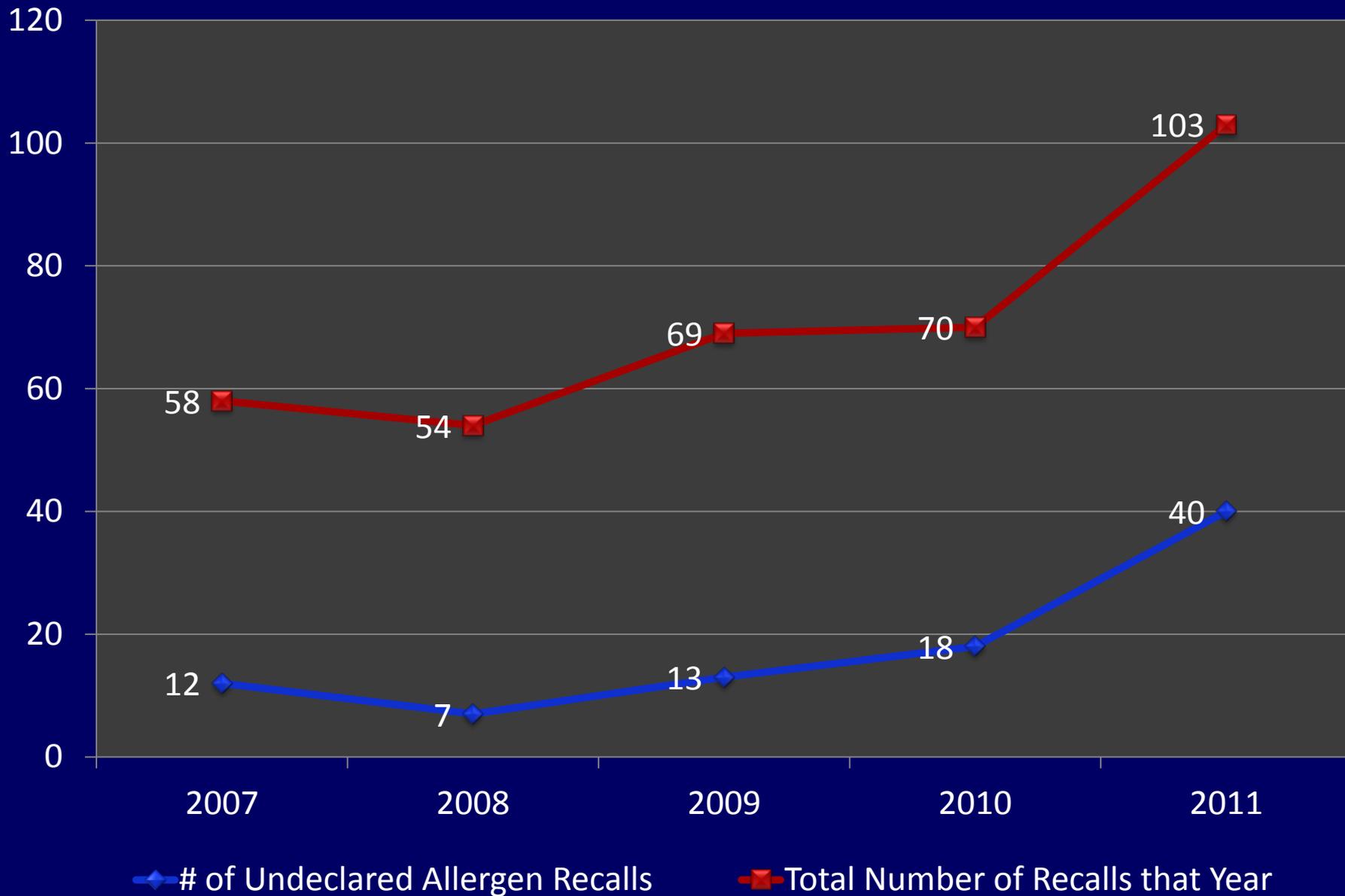
- Wheat
- Crustacean shellfish (e.g. shrimp, crab, lobster)
- Eggs
- Fish
- Peanuts
- Milk
- Tree Nuts (e.g. almonds, pecans, walnuts)
- Soybeans



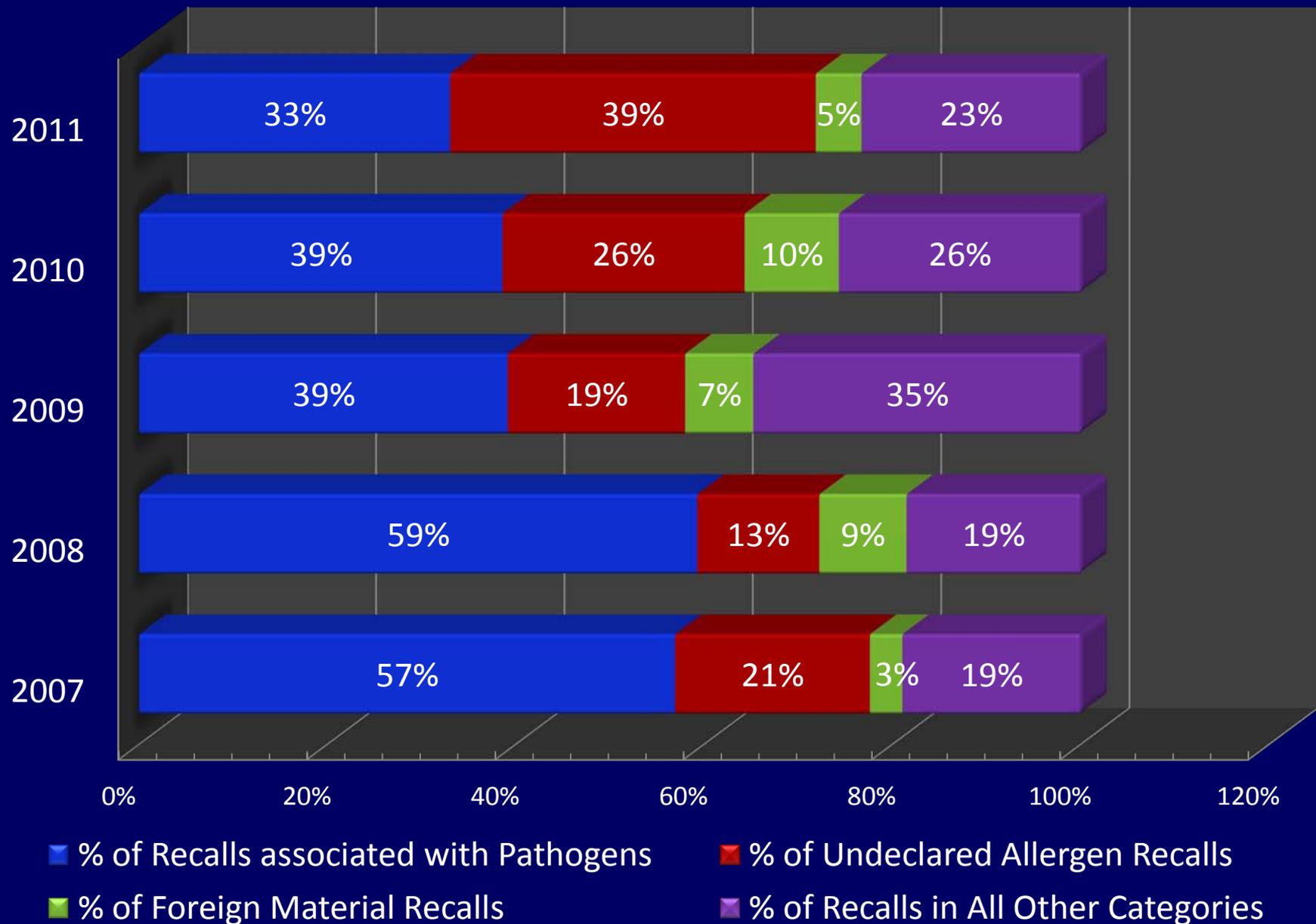
# Ingredient Labeling and Allergen Statements

- Agency regulations require all ingredients to be declared in descending order of predominance in the ingredients statement
- Food Allergen Labeling and Consumer Protection Act (FALCPA) did not amend the FMIA, PPIA, and EPIA
- FSIS supports voluntary use of allergen statements, e.g., “contains: soy”  
[http://www.fsis.usda.gov/Regulations\\_&Policies/LabelingAllergens/index.asp](http://www.fsis.usda.gov/Regulations_&Policies/LabelingAllergens/index.asp)
- LPDD evaluates “may contain” type statements on a case by case basis

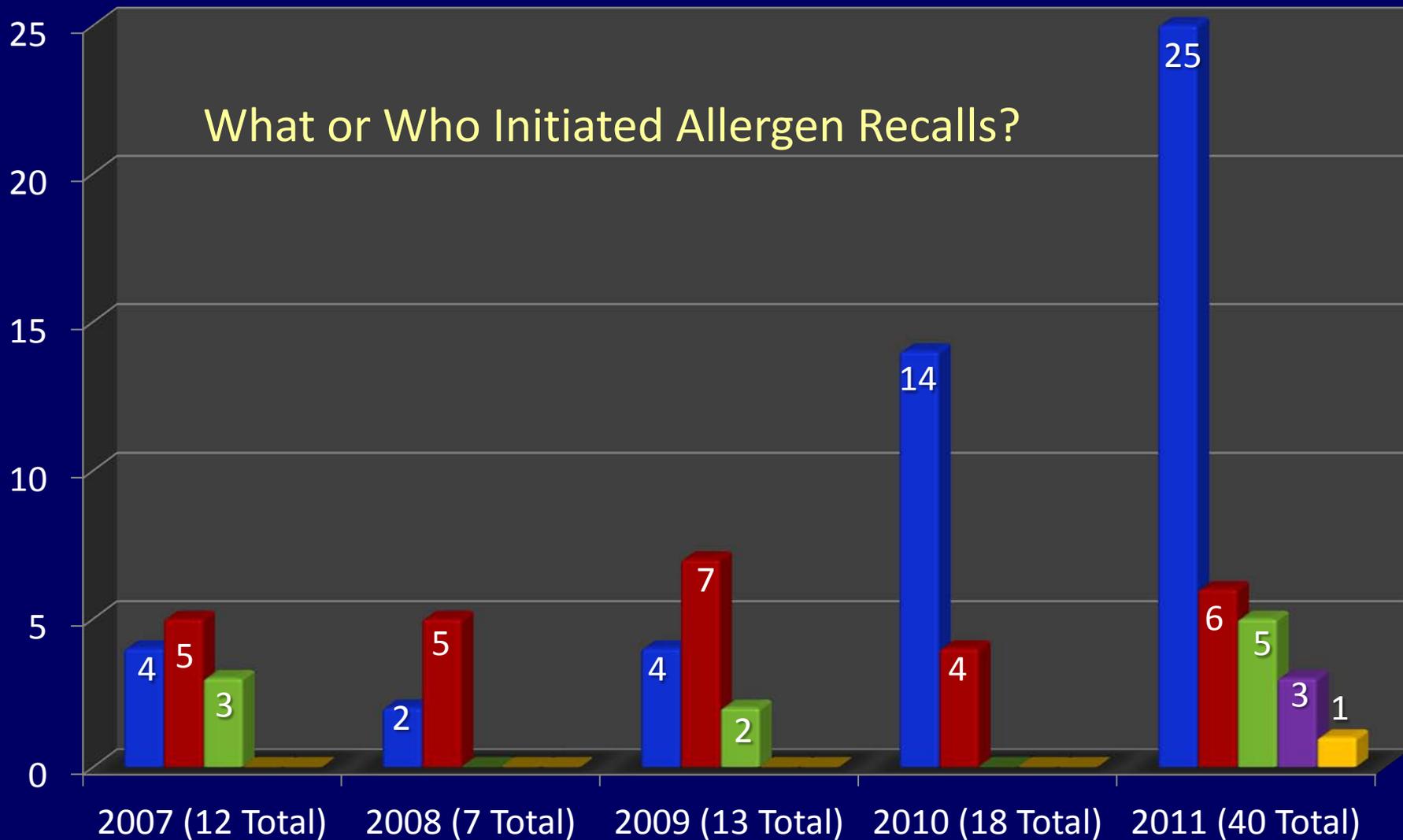
# No. of Allergen Recalls Compared to Total Recalls



# % of Recalls by Reason from 2007 to Present



## What or Who Initiated Allergen Recalls?

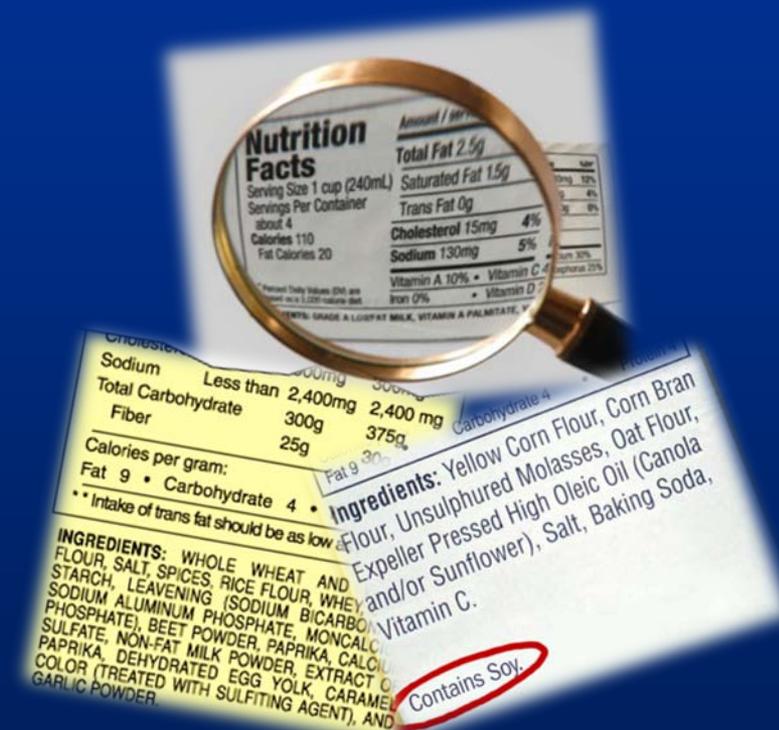


- # Discovered by FSIS Verification Activities
- # Discovered by EST
- # Discovered by a Consumer
- # Discovered by a 3rd Party
- # Discovered by FDA in dual jurisdiction EST

## What Caused Allergen Recalls in 2011?

- New Ingredient and/or New Supplier
- Misprinted Label
- Product in wrong package
- Product reformulated
- Ingredient reformulated

ALWAYS make SURE ALL  
ingredients and sub-ingredients  
are declared on the finished product label





## Allergen Recalls

- The occurrence of a recall indicates the establishment has failed to:
  - address the chemical (allergen) food safety hazard in its hazard analysis;
  - to support a decision in the hazard analysis;
  - reassess its hazard analysis;
  - effectively implement the controls to support a decision (see 9 CFR 417.2, 417.3, 417.4, 417.5, 417.8).



# Establishment Responsibilities

- Identify
- Prevent
- Declare



## Identify

- All ingredients going into a product must be identified before the assembly process.
- Inspect incoming non-meat ingredients by matching component labels, specification sheets, etc.



# Prevent

- Equipment
- HACCP plan
- Sanitation Standard Operating Procedures
- Allergen Control Plan
- Packaging and storing meat products containing allergens and those that do not.



## Declare

- Labeling procedures

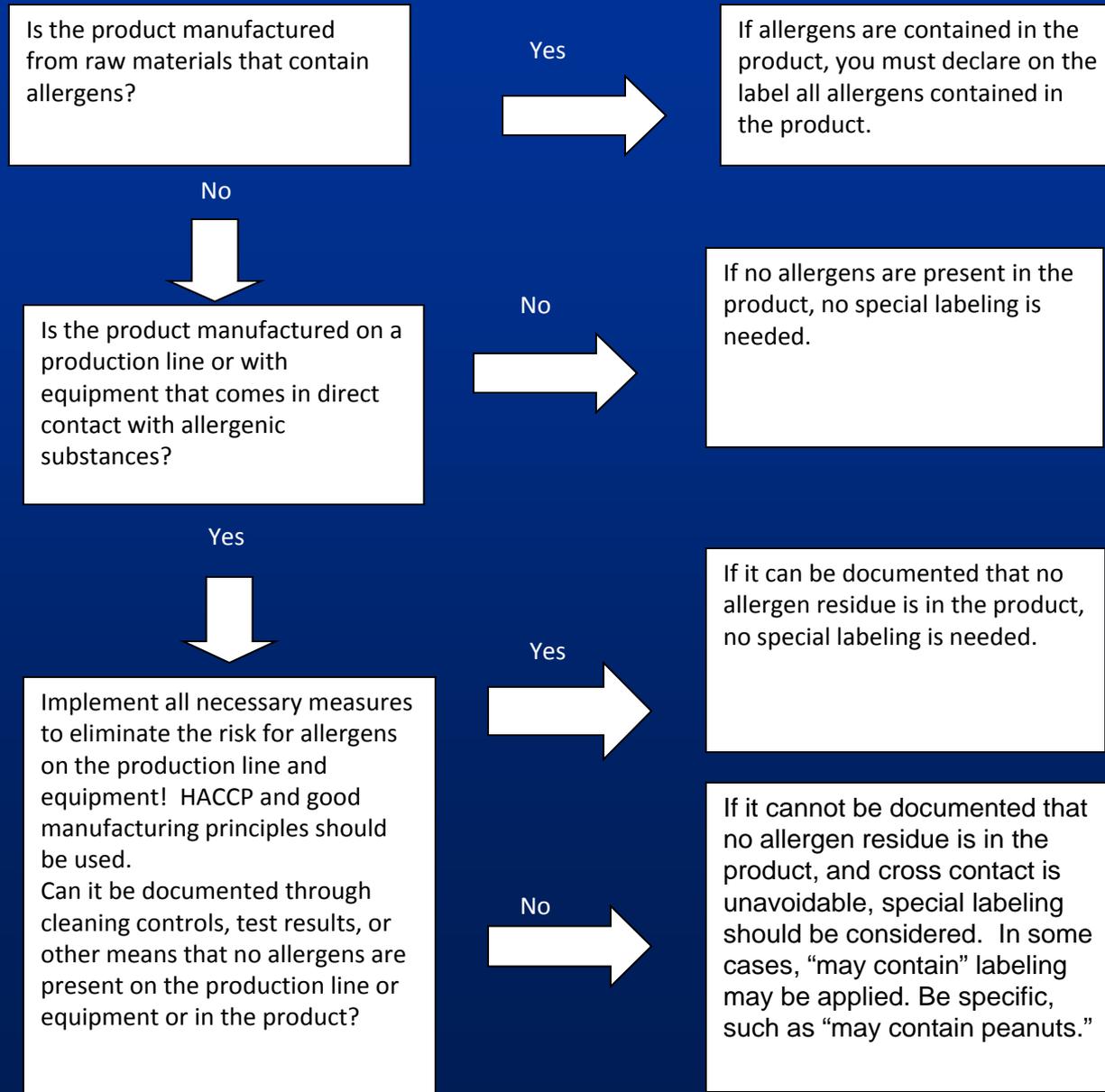


## FSIS Actions

- Issued notice, Verification Activities Related to the use of Ingredients of Public Health Concern, FSIS Notice 35-11
- Notice was issued for instructions for inspection activities for in plant personnel, FSIS Notice 54-11



Allergen Risk Evaluation and Labeling





## “May Contain” Statement

- Notice 54-11 explained Agency’s position on carrying through “may contain” type statements from incoming product labels to final labels
- Statement not required to be carried through *provided* the establishment contacts supplier and: (1) confirms, preferably in writing, that the statement is a cautionary statement, and no such ingredient is in the product; and (2) includes a written statement in its hazard analysis documentation to support why the “may contain” or “produced in a facility” statement is not carried forward to the finished meat or poultry product label



## Recap

- Verify labels match the product through pre-shipment review of records.
- Work with FSIS in plant personnel.



# Ask FSIS

Submit additional questions  
to: [askfsis.custhelp.com](https://askfsis.custhelp.com)