

Creating an Effective Allergen Control Plan for Kitchens

Overview

An Allergen Control Plan, or ACP for short, is a facility's master plan for food allergy awareness and safety. It should cover a variety of topics to ensure a solid foundation for running an allergen-free station. The ACP could be one document with multiple sections, or it could be separate written policies and procedures as standalone documents.

There are a lot of resources online for creating an ACP, but most of them focus on a manufacturing environment which differs significantly from a kitchen. It's important to recognize threats to allergen controls at all stages of food preparation, from ordering to production to service, and document the steps taken to provide safe food for allergic diners and how those processes are verified.

Topics to Cover

The Certified Free From standards provide a detailed list of what's expected from a participant seeking certification. These different sections should be used to guide the development of a facility's ACP:

- Facility Controls
- Purchasing and Receiving
- Storage and Handling
- Preparation
- Cleaning and Sanitizing
- Staff Training
- Quality Control
- Labeling
- Testing



When you start to put together your ACP, you don't need to reinvent the wheel. You can first gather the policies and procedures you already have in place and that staff have been trained on, then go through the standards to fill in the rest.

Policy vs. Procedure

Throughout the CFF standards, you'll see both "policy" and "procedure" used, sometimes together in the same standard. A **policy** provides guidelines and expectations for how a facility operates. A **procedure** provides detailed instructions on how something should be done.

Example: A facility should have a policy in place that all ingredients used in the certified space must be carefully vetted for allergens prior to being ordered, including what their expectations are for manufacturer responses, documentation, etc. A supplemental procedure should also be in place with detailed instructions of how manufacturers are contacted, what information should be gathered, how all of that is documented and maintained, along with any other pertinent details as outlined in the corresponding policy.

It's important to have all policies and procedures documented. While it may be common to give verbal instructions or expectations to staff, not having a written document to back that up can create gaps in training and understanding. Staff should always have access to the documented policies and procedures so there's never a question of what they should be doing.

When the CFF auditor is onsite, they will check that policies and procedures are well documented, and they will also look for evidence that they are effective and being followed. This could include questions about how policies are implemented, staff interviews, or general observations during the facility walk-through.

Example: If a policy is in place that all visitors of the facility be asked to wash their hands and put on an apron and hairnet prior to entering the back of house but the auditor is not asked to do so, that could be classified as an ineffective policy.

To further prove that policies and procedures are being followed, the CFF auditor may also request additional types of documents as evidence. These could be things such as training or cleaning logs, inspection reports from local health agencies, posted signage at the facility, product specification sheets, and more. Just like with policies and procedures, it's important that the documents listed above are detailed, up-to-date, and easily accessible.

Disclaimer: This document is for informational purposes only, and does not provide legally binding requirements. Certified Free From by MenuTrinfo participants are required to pass all standards, including those regarding documentation, in order to achieve certification. This information is being provided to all CFF participants, and while following the advice provided is strongly recommended, it does not guarantee an easier, faster, or cheaper audit.

