

## MEMORANDUM

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Revised 8/24/18

**To:** Our Clients and Customers  
**From:** Nutrition Department  
**Re:** Whitsons Allergen Policy

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This memo shall serve as further clarification to our Allergen Management Policy statement printed in our allergen binders at our “right to know” stations on each serving line. The statement is attached to this memo for your convenience.

### **Top Eight Allergens**

When it comes to declaring allergens, Whitsons follows the FDA’s labeling guidelines to ensure we identify the **eight major allergens** that are present in the foods we serve. With over 160 known food allergens, it is not possible or useful to highlight every potential allergen in every recipe in our database. Therefore, additional allergens exclusive of the top eight are not identified as a major allergen on product labels; however, **specification sheets listing all ingredients** in Whitsons’ products are available to parents and school nurses at all times. We are extremely sensitive to the fact that many children have food allergies beyond the top eight and our staff will work closely with nurses and parents to develop meal plans that meet the special diet needs of those children.

The top eight food allergens are listed in a binder by category and include:

- Milk/Milk Products
- Wheat/Wheat Products
- Egg/Egg Products
- Peanut/Peanut Products
- Tree Nut/Tree Nut Products
- Soy/Soy Products
- Fish/Fish Products
- Shellfish/Shellfish Products

### **Interactive Menus and Mobile Device Links**

In addition, our school nutrition program webpages for each school district we serve (linked to the school district website) feature interactive menus. Nutrition information and allergens can be viewed by double--clicking on a menu item and selecting the items you wish to view. We also have a link for mobile devices that will list the menu choices by school each day. Nutrition information and allergens are available by simply checking off your menu selections and tapping the “get nutrition facts” button.

### **Inadvertent Allergens, GMPs and SSOPs**

Please note that, in keeping with FDA recommendations, we do not list foods that may be made on shared equipment or housed in the same facility as other allergens (inadvertent allergens). For example, if a slice of bread contains wheat but is made on a line that also processes soy, Whitsons will declare the food to have wheat but not soy. This is because we require all of our manufacturers to have Good Manufacturing Practices (GMPs) and effective Sanitation Standard Operating Procedures (SSOPs) in place to eliminate the possibility of cross--contamination from inadvertent allergens in the manufacturing process. The FDA has advised manufacturers that the practice of

disclaimer labeling “should not be used as a substitute for adherence to GMPs.” This is especially true because this type of precautionary labeling is completely voluntary, so manufacturers are not required to do so. **In fact, for manufacturers that DON’T list precautionary allergens, it doesn’t mean their products are processed in allergen-free environments.** Below is an excerpt from the FDA:

*“The agency is aware that some manufacturers are voluntarily labeling their products with statements such as “may contain (insert name of allergenic ingredient).” FDA advises that, because adhering to good manufacturing practice (GMP) is essential for effective reduction of adverse reactions, such precautionary labeling should not be used in lieu of adherence to GMP. The agency urges manufacturers to take all steps necessary to eliminate cross contamination and to ensure the absence of the identified food.”<sup>1</sup>*

For manufacturers that process peanuts and tree nuts, Whitsons gives preference to suppliers whose plants use separate equipment and separate rooms to process these products. Where that is not possible, we require our suppliers to strictly maintain GMPs and utilize the highest level of safeguards to prevent inadvertent cross--contamination. This policy is applied to all products we specify for use in the schools we serve, except where peanut and tree nut products are specifically requested by a school district in its contract requirements.

Whitsons does all it can within its control to ensure the wholesomeness of the products that arrive into our schools daily. From the point of delivery on, it is the responsibility of the Food Service Director (FSD) to ensure that all the proper HACCP controls are in place with the team. We have an allergen--training for food service workers, to educate them on the sensitivities of handling allergens to prevent cross--contamination inside the kitchen and on the serving line. We also have a very detailed Allergen Standard Operating Procedure Manual that each operation is required to follow, in collaboration with the district’s specific allergen policies and protocols that may also be in place.

Outside of the school foodservice operations, many districts have additional policies in place to ensure that children with food allergies are not exposed to inadvertent allergens brought into the cafeterias by children who bring lunches from home containing allergens or prepared in a home where those allergens may be present. These policies vary by district and can be obtained by contacting your child’s school.

# Allergen Management Policy



Whitsons School Nutrition policy is to procure products that do not contain peanuts or tree nuts as an ingredient. This policy is applied to all products we specify for use in the schools we serve, except where specifically requested by a school district in its contract requirements.

Each of our suppliers must demonstrate adherence to our stringent requirements for allergen declaration and proper handling procedures to prevent inadvertent cross-contamination with potential food allergens. Letters of Guarantee, Certificates of Insurance and a completed Food Safety and/or Food Defense Questionnaire are required for each supplier, which includes detailed information on suppliers' HACCP plans and allergen handling procedures. We carefully review ingredient statements provided by the manufacturer for each product we source. This information is incorporated into Whitsons' comprehensive recipe database, where we maintain detailed information on ingredients, nutrients and allergens for each menu item we serve.

In addition to full ingredient and nutritional disclosure, which are available upon request, we track all of the top allergens designated by the FDA: milk, eggs, peanuts, tree nuts, fish, shellfish, soy and wheat. Students and parents can access nutrition and allergen information easily

by visiting their school district website, viewing our online menus and clicking on any day's menu to see allergens and nutrition information. Detailed ingredient declarations for each product can be obtained from the foodservice director and/or school nurse.

Whitsons thoroughly vets all manufacturer partners prior to specifying their products. The vetting process includes, but is not limited to, certificate of assurance, certificate of insurance, microbiological testing of product, analytical properties such as chemical proportions, % of fat, moisture content, sieve size, texture, color, shelf life under real conditions, ingredient and allergen properties. For product categories requiring it (e.g., food categories), Whitsons requires our manufacturer partners to belong to the Global Food Safety Initiative (GFSI), which uses internationally recognized standards for good manufacturing practices (GMPs), the highest safety and quality standards in the world. We provide a reasonable time period for our suppliers to obtain SQF, BRC or equivalent third party certification, which are very rigorous standards that must be obtained and maintained. Our audit team reviews third party audit and QA inspection results and conducts random facilities inspections at our suppliers' manufacturing plants to ensure GMPs are followed. Our certification process includes reviewing how our manufacturer partners manage their own supply chains with their suppliers, and we will require corrective action when appropriate. Manufacturers that do not continue to meet these rigorous standards shall be prohibited from remaining manufacturer partners of Whitsons.

For manufacturers that process peanuts and tree nuts, specifically, Whitsons gives preference to suppliers whose plants use separate

equipment and separate rooms to process products containing nuts. Where that is not possible, we require our suppliers to strictly maintain GMPs and utilize the highest level of safeguards to prevent inadvertent cross-contamination.

Given the level of inspections and compliance on the part of the manufacturer, Whitsons' policy of categorizing products by allergen based on the ingredients they contain is rationally sound and in compliance with applicable law.

Whitsons does all it can within its control to ensure the wholesomeness of the products that arrive into our schools daily. From the point of delivery on, it is the foodservice director's job to ensure that all the proper HACCP controls are in place with the team. Furthermore we run allergen-training classes to educate food service workers on the sensitivities of handling allergens to prevent cross-contamination inside the kitchen and on the serving line.

**A special note of caution** for individuals with the most sensitive allergies: even with all these controls already in place and operating seam-

lessly behind the scenes, Whitsons cannot guarantee that all food products will be completely 100% allergen-free at the time of consumption. Although Whitsons has implemented proper handling procedures and protocols within the areas it controls (including HACCP and Food Defense Plans), Whitsons cannot control and cannot be held liable for potential cross-contamination occurring in areas outside of its control. The procedures we have in place can greatly reduce the risk of allergen exposure, but they cannot entirely eliminate the risk for highly allergic individuals who may still react to even low levels of allergens due to inadvertent cross-contamination. Such inadvertent cross-contamination could occur while food products are transported by third party carriers, or due to the presence of allergen particles in the ambient air within the food preparation area or in the dining area, where other students may be consuming allergen-containing foods in close proximity to students with food allergies. However, we take every precaution within our control to reduce that risk.

Whitsons' recommended course of action to ensure the safety of students with food allergies is for the on-site manager to collaborate directly with students, parents and district nutritional staff to create an individual meal plan to accommodate students with dietary restrictions or special dietary needs. If a student has a food allergy and does not see the item he/she wishes to consume listed in the allergen binder, **DO NOT ASSUME IT IS SAFE TO EAT WITHOUT FIRST CHECKING WITH THE WHITSONS ON SITE MANAGER AND/OR THE PRODUCT MANUFACTURER DIRECTLY.** Please feel free to contact the foodservice manager to discuss you or your child's dietary needs at any time. We are here to help!