

**To:** The Fairfield School Community  
**From:** Luiza Emery, Foodservice Director  
**Date:** September 15, 2014  
**Re:** Allergen Policy and Allergens in Bakery Products

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We'd like to take this opportunity to issue a statement providing clarity in response to recent questions about allergen declarations in bakery products served at Fairfield school cafeterias.

First, we wish to point your attention to our Allergen Management Policy statement printed in our allergen binders at our "right to know" stations on each serving line. The statement is included herein 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 60 known food allergens, it is not possible or useful to identify 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 by contacting the food service office. 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 food service program webpage for Fairfield <http://fairfieldschools.org/> features 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

<sup>1</sup><http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm106546.htm>

**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 tutorial available to all food service workers to take, to educate them on the sensitivities of handling allergens to prevent cross-contamination inside the kitchen and on the serving line.

Furthermore, the district has 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 include a "no food sharing policy" as well as peanut and tree nut free lunch tables.

### **Bakery Products**

Understanding that we only list allergens based on ingredients actually contained in the product, the Fairfield community has asked us to clarify whether or not our bakery products are produced in facilities where other products containing peanuts or tree nuts are also produced. We have obtained confirmation in writing from each bakery supplier. This information is provided below:

- ALL our bakery products for Fairfield are made in an environment that is entirely free of peanuts, peanut products and peanut oils.
- Products made in a facility that is also free of tree nuts include:
  - Hamburger and hot dog buns
  - Whole wheat sliced bread, club rolls, Kaiser rolls, tortillas and Panini bread
  - Whole grain pitas
- Products made in a facility that also processes tree nuts (not peanuts), but made on dedicated tree nut free machinery include:
  - Bagels
  - Whole grain dinner rolls

Therefore, all bakery products at Fairfield are produced in a completely peanut free facility, on either dedicated tree nut free equipment or in an entirely tree nut free facility. Please note that the bakery products are not produced in a seed free facility; various seeds, including sesame, are used in different products, particularly bagels.

We hope this information is helpful in determining which products you wish your child to consume in the school cafeterias. If you have any further questions, please do not hesitate to contact me directly. I am here to help!

Sincerely,

Luiza Emery  
Food Service Director

<sup>1</sup><http://www.fda.gov/Food/GuidanceRegulation/GuidanceDocumentsRegulatoryInformation/Allergens/ucm106546.htm>