PLANES DE CONTROL EN LOS ESQUEMAS DE INOCUIDAD ALIMENTARIA

BRC, IFS & FSSC2200

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Las diferentes normas de inocuidad alimentaria a lo largo de los años han evolucionado a fin de garantizar que los operadores alimentarios puedan desarrollar su actividad a fin de proporcionar productos inocuos a los consumidores.

Dentro de este objetivo se encuentra el desarrollo del plan de análisis, control de alérgenos,… para cada uno de ellos.

Se puede decir que no hay un esquema más restrictivo en relación a los criterios que rodean al plan de análisis si no que cda una de las normas por si mismas establece unos requisitos específicos, que en ocasiones se complementan los unos a los otros.

Es por esto que se va a llevar a cabo una evaluación de los requisitos para cada una de las normas que actualmente se certifican en nuestros días; siendo la incorporación de los requisitos BRC v7 una novedad en ello.

PLAN DE ANALISIS

BRC v6 vs V7

	BRC FOOD v6		BRC FOOD v7
5.5	**Product inspection and laboratory testing**	**5.6**	**Product inspection and laboratory testing**
	The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, legality and quality, using appropriate procedures, facilities and standards.		The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, legality and quality, using appropriate procedures, facilities and standards
5.5.1	**Product inspection and testing**	**5.6.1**	**Product inspection and testing**
5.5.1.1	There shall be a scheduled programme of testing covering products and the processing environment which may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, frequency and specified limits shall be documented.	5.6.1.1	There shall be a scheduled programme of testing covering products and the processing environment which may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, frequency and specified limits shall be documented
5.5.1.2	Test and inspection results shall be recorded and reviewed regularly to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.	5.6.1.2	Test inspection results shall be recorded and reviewed regularly to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.
5.5.1.3	The company shall ensure that a system of on-going shelf-life assessment is in place. This shall be based on risk and shall include microbiological and sensory analysis as well as relevant chemical factors such as pH and aw. Records and results from shelf life tests shall validate the shelf life period indicated on the product.	5.6.1.3	The company shall ensure that a system of on-going shelf-life assessment is in place. This shall be based on risk and include microbiological where applicable and sensory analysis as well as relevant chemical factors such as pH and aw. Records and results from shelf life tests shall verify the shelf life period indicated on the product.
5.5.2	**Laboratory testing**	**5.6.2**	**Laboratory testing**
5.5.2.1	Pathogen testing shall be subcontracted to an external laboratory or, where conducted internally, the laboratory facility shall be fully segregated from the manufacturing site and have operating procedures to prevent any risk of product contamination.	5.6.2.1 .	Pathogen testing shall be subcontracted on an external laboratory or, where conducted internally, the laboratory facility shall be fully segregated from the production and storage areas and have operating procedures to prevent any risk of product contamination.
	Where routine testing laboratories are present on a manufacturing site, they shall be located, designed and operated to		Where routine testing laboratories are present on a manufacturing site, they shall be located, designed and operated to

	eliminate potential risks to product safety. Controls shall be documented, implemented and shall include consideration of the following: • design and operation of drainage and ventilation systems • access and security of the facility • movement of laboratory personnel • protective clothing arrangements • processes for obtaining product samples • disposal of laboratory waste.		eliminate potential risks to product safety. Controls shall be documented, implemented and shall include consideration of the following: Design and operation of drainage and ventilation systems Acces and security of the facility Movement of laboratory personnel Protection clothing arrangements Processes for obtaining product samples Disposal of laboratory waste
5.5.2.2	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025. Documented justification shall be available where accredited methods are not undertaken.	5.6.2.2	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have grained recognized laboratory accreditation or operate in accordance with the requirements and principles of ISO17025. Documented justification shall be available whrere accredited methods are not undertaken. The results of external testing shall be formally reviewed.
5.5.2.3	Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in 5.5.2.3. These shall include: • use of recognised test methods, where available • documented testing procedures • ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required • use of a system to verify the accuracy of test results, e.g. ring or proficiency testing • use of appropriately calibrated and maintained equipment.	5.6.2.3	Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in 5.5.2.3. These shall include : - Use of recognized test methods, where available. - Documented testing procedures - Ensuring staff are suitability qualified and(or trained and competent to carry out the analysis required - Use of a system to verify the accuracy of tests results, e.g. ring or proficiency testing - Use of appropriate calibrated and maintained equipment.

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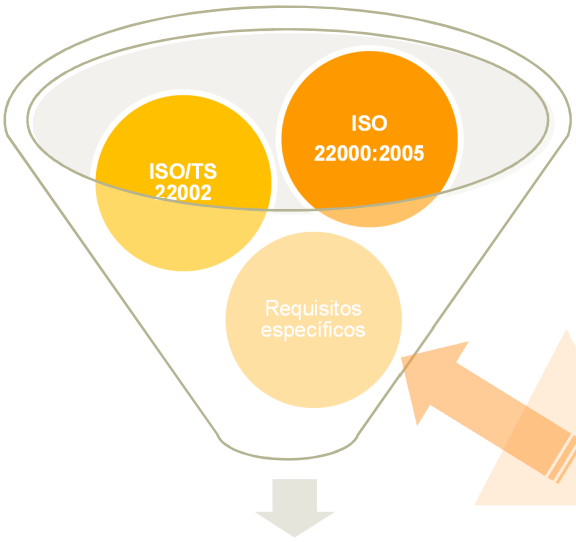
5.6	Product Analysis
5.6.1	There shall be procedures ensuring that all specified product requirements are met, including legal requirements and specifications. Microbiological, physical and chemical analysis required for that purpose shall be performed internally and/ or subcontracted.
5.6.2	Analyses, which are relevant for food safety, shall preferably be performed by laboratories having appropriate accredited programs/ methods (ISO 17025). If the analyses are performed by a factory internal or a laboratory not having appropriate accredited programs/ methods, the results shall be verified on a regular basis by laboratories accredited on these programs/ methods (ISO 17025).
5.6.3	Procedures shall exist which ensure the reliability of the internal analysis results on the basis of official recognised analysis methods. This shall be demonstrated by ring tests or other proficiency tests.
5.6.4	A test plan shall be drawn up for internal and external analysis, based on hazard analysis and assessment of associated risks, which covers raw materials, semi-processed and finished products as well as processing equipments and packaging materials, and where necessary environmental tests. The test results shall be documented.
5.6.5	Results of analysis shall be evaluated promptly. Appropriate corrective measures shall be introduced for any unsatisfactory results. The analytical results shall be reviewed regularly in order to identify trends. Trends indicating potential unsatisfactory results shall be taken into consideration.
5.6.6	Where internal analysis is undertaken, qualified and trained personnel shall be in place, as well as appropriate equipment and premises.
5.6.7	For verification of finished product quality, internal organoleptic tests shall be carried out regularly. These tests shall be in accordance with specifications and related to the impact on respective parameters of product characteristic. The results of these tests shall be documented.
5.6.8	Based on hazard analysis, assessment of associated risks and on any internal or external information on product risks which may have an impact on food safety and/or quality (incl. adulteration and fraud), the company shall update its control plan and/ or take any appropriate measure to control impact on finished products.

FSSC222000



- Inventario legislación de seguridad alimentaria aplicable a su actividad
- Todos los servicios (transporte, mantenimiento, etc,) conformes a requisitos especificados, en base al análisis de riesgos
- Supervisión efectiva del personal en la aplicación de los criterios de higiene
- Análisis críticos de parámetros de inocuidad alimentaria realizados en laboratorios acreditados ISO17025

Los requisitos asociados al plan de análisis son:

ISO22000:2005	**7.8 Verification planning**
	Verification planning shall define the purpose, methods, frequencies and responsibilities for the verification activities. The verification activities shall confirm that a. The PRP(s) are implemented (see 7.2), b. Input to the hazard analysis (see 7.3) is continually updated, c. The operational PRP(s) (see 7.5) and the elements within the HACCP plan (see 7.6.1) are implemented and effective, d. Hazard levels are within identified acceptable levels (see 7.4.2), and e. Other procedures required by the organization are implemented and effective. The output of this planning shall be in a form suitable for the organization's method of operations. Verification results shall be recorded and shall be communicated to enable the analysis of the results of the verifications activities (see 8.4.3). If system verification is based on testing of end product samples, and whre such tests samples show nonconformity with the acceptable level of the food safety hazard (see 7.4.2), the affected lots of product shall be handled as potentially unsafe in accordance with 7.10.3
ISO/TS22002-1	**5.5 Laboratory Facilities**
	In-line and on-line tests facilities shall be controlled to minimize risk of product contamination. Microbiology laboratories shall be designed, located and operated so as to prevent contamination of people, plant and products. They shall not open directly on to a production area.

QUE REPRESENTAN ESTOS REQUISTOS…

Los nuevos cambios que se introducen en el sistema de certificación BRC en relación al plan de análisis están en la necesidad de que aunque el laboratorio externo esté acreditado en ISO17025 se deberán llevar a cabo una revisión formal de los resultados.

Que significa la necesidad de revisar formalmente los resultados? La respuesta pasa por una revisión en profundidad no tan solo de que el laboratorio se encuentre acreditado en ISO17025 si no que en la comprobación conforme la técnica utilizada corresponde a la técnica acreditada.

A lo largo de las auditorías de certificación de los esquemas BRC, IFS i FSSC 22000 nos hemos encontrado en numerosas ocasiones en las que se dan este tipo de no conformidad.

A continuación se identifican algunas de las no conformidades tipo que se detectan en relación a este requisito:

It has been observed that Bi…l Laboratory used by microbiological analysis (modifying and pathogenic agents) does not have ISO17025 certification for those test
Detects that the A…A laboratory does not have certification ISO17025 for agri-food sector. A....OL analyses are underway with the technique not accredited for determinations of pathogens
Is detected that while the external laboratory has ISO17025 accreditation for different parameters, however detected that not all determinations of pathogens is carried out under the analysis (eg ISO17025 accredited. Determination of e. coli)

GESTION DE LOS ALERGENOS

BRC v6 vs BRC v7

BRC FOOD v6		BRC FOOD v7	
5.2		**5.3**	**Management of allergens**
	The company shall have a developed system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling.		The company shall have a system for the management of allergenic materials which minimizes the risk of allergen contamination of products and meets legal requirements for labelling in the country of sale
5.2.1	The company shall carry out an assessment of raw materials to establish the presence and likelihood of contamination by allergens (refer to glossary). This shall include review of raw material specifications and, where required, obtain additional information from suppliers, for example through questionnaires to understand the allergen status of the raw material, its ingredients and the factory in which it is produced.	5.3.1	The company shall carry out an assessment of raw materials to establish the presence and likelihood of contamination by allergens (refer to glossary). This shall include review of raw materials specifications and, where required, obtain additional information from suppliers, for example through questionnaires to understand the allegen status of the raw material, its ingredients and the factory in which it is produced.
5.2.2	The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products and any new product development ingredients or products.	5.3.2	The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products and any new product development ingredients or products. A list shall be available of products which do not contain allergens and therefore need to be protected from contamination.
5.2.3	A documented risk assessment shall be carried out to identify routes of contamination and establish documented policies and procedures for handling raw materials, intermediate and finished products to ensure cross-contamination is avoided. This shall include: • consideration of the physical state of the allergenic material, i.e. powder, liquid, particulate • identification of potential points of cross-contamination through the process flow • assessment of the risk of allergen cross-contamination at each process step	5.3.3	A documented risk assessment shall be carried out to identify routes of contamination and establish documented policies and procedures for handling raw materials, intermediate and finished products to ensure cross-contamination is avoided. This shall include: • consideration of the physical state of the allergenic material, i.e. powder, liquid, particulate • identification of potential points of cross-contamination through the process flow • assessment of the risk of allergen cross-contamination at each process step identification of suitable controls to reduce or eliminate the risk of cross-contamination.

	identification of suitable controls to reduce or eliminate the risk of cross-contamination.		
	Documented procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination into products not containing the allergen. This shall include as appropriate: • physical or time segregation whilst allergen-containing materials are being stored, processed or packed • the use of separate or additional protective over clothing when handling allergenic materials • use of identified, dedicated equipment and utensils for processing • scheduling of production to reduce changes between products containing an allergen and products not containing the allergen • systems to restrict the movement of airborne dust containing allergenic material • waste handling and spillage controls restrictions on food brought onto site by staff, visitors, contractors and for catering purposes.	5.3.4	Documented procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination into products not containing the allergen. This shall include as appropriate: • physical or time segregation whilst allergen-containing materials are being stored, processed or packed • the use of separate or additional protective over clothing when handling allergenic materials • use of identified, dedicated equipment and utensils for processing • scheduling of production to reduce changes between products containing an allergen and products not containing the allergen • systems to restrict the movement of airborne dust containing allergenic material • waste handling and spillage controls restrictions on food brought onto site by staff, visitors, contractors and for catering purposes.
5.2.5	Where rework is used, or reworking operations carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen.	5.3.5	Where rework is used, or reworking operations carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen.
5.2.6	Where the nature of the production process is such that cross-contamination from an allergen cannot be prevented, a warning shall be included on the label. National guidelines or codes of practice shall be used when making such a warning statement.	5.3.6	Where the nature of the production process is such that cross-contamination from an allergen cannot be prevented, a warning should be included on the label. National guidelines or codes of practice shall be used when making such a warning statement.
5.2.7	Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers, the company shall ensure that the production process is fully validated to meet the stated claim. This shall be documented.	5.3.7	Where the nature of the production process is such that cross-contamination from an allergen cannot be prevented, a warning shall be included on the label. National guidelines or codes of practice shall be used when making such a warning statement.
5.2.8	Equipment or area cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination by allergens. The cleaning methods shall be validated to ensure they	5.3.8	Equipment or area cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination by allergens. The cleaning methods shall be validated to ensure they

	are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use.		are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use.
5.2.9	All relevant personnel, including engineers, temporary staff and contractors, shall have received general allergen awareness training and be trained in the company's allergen-handling procedures.		
5.2.10	An effective system of documented checks shall be in place at line start-up, following product changeover and changes in batches of packaging to ensure that the labels applied are correct for the products packed.		

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4.20	**Allergens and specific conditions of production**
4.20.1	Raw material specifications identifying allergens requiring declaration that are relevant to the country of sale of the finished product shall be available. The company shall maintain a continuously up to date listing of all raw materials containing allergens used at its premises, which also identifies all blends and formulas to which such raw materials containing allergens are added.
4.20.2	The manufacturing of products which contain allergens requiring declaration shall be carried out as to ensure cross contamination is minimised as far as possible.
4.20.3	Finished products containing allergens requiring declaration shall be declared in accordance with current legal requirements. For the adventitious or unintentional presence, the labelling of legally declared allergens and traces shall be based on hazard analysis and assessment of associated risks.
4.20.4	Where customers specifically require that products are "free from" certain substances or ingredients (e.g. gluten, pork, etc), or that certain methods of treatment or production are excluded, verifiable procedures shall be in place.

FSSC 22000

ISO22000:2005	7.2.3
	When selecting and/or establishing PRP(s), the organization shall consider and utilize appropriate information [e.g. statutory and regulatory requirements, customer requirements, recognized guidelines, Codex Alimentarius Commission (Codex) principles and codes of practices, national, international or sector standards]. NOTE Annex C gives a list of relevant Codex publications. The organization shall consider the following when establishing these programmes: a. construction and lay-out of buildings and associated utilities; …. g. measures for the prevention of cross contamination; … Verification of PRP(s) shall be planned (see 7.8) and PRP(s) shall be modified as necessary (see 7.7). Records of verifications and modifications shall be maintained. Documents should specify how activities included in the PP(s) are managed.
ISO/TS22002-1	**10.3 Allergen management**
	Allergens presents in the product, either by design or by potential manufacturing cross-contact, shall be declared. The declaration shall be on the label for consumer products, and on the label or the accompanying documentation for products intended for further processing. Products shall be protected from unintended allergen cross-contact by cleaning and line change-over practices and/or product sequencing. NOTE Manufacturing cross-contact can arise from either: 1. traces of product from the previous production run which cannot be adequately cleaned from the product line due to technical limitations: or 2. when contact is likely to occur, in the normal manufacturing process, with product or ingredients that are produced on separate lines, or in the same or adjacent processing areas Rework containing allergen(s) shall be used only: a. in products which contain the same allergens(s) by design; or b. through a process which is demonstrated to remove or destroy the allergenic material. NOTE For general rework requirements, see Clause 14 Employees handling food should receive specific training in allergen awareness and associated manufacturing practices.

QUE REPRESENTAN ESTOS REQUISTOS…

Es necesario establecer procedimientos apropiados para evitar la contaminación cruzada con alérgenos y establecer mecanismos de verificación apropiados.

Actualmente se encuentran legislados los valores cuantitativos de 2 de los 12 que indica la legislación vigente Directiva 2003/89/EC

Pero eso quiere decir que para los otros alérgenos no hay límites aceptables a tomar en consideración? Se deberá establecer límites y parámetros de control.

El Reglamento (UE) Nº 1169/20111 sobre la información alimentaria facilitada al consumidor modifica considerablemente la legislación vigente sobre el etiquetado de los alimentos, incluida la información y los requisitos sobre alérgenos. Las nuevas normas se aplicarán a partir del 13 diciembre de 2014.
El Reglamento describe los requisitos relativos a la indicación obligatoria de alérgenos, el etiquetado de determinadas sustancias o productos que causan alergias e intolerancias, la información adicional voluntaria y el etiquetado de alérgenos de alimentos no envasados.
Las sustancias o productos que causan alergias se deben indicar también en los alimentos no envasados. Cada ingrediente, o coadyuvante tecnológico procedente de una sustancia o producto que causa alergias o intolerancias deberá:

- Indicarse en la lista de ingredientes con la mención del nombre de la sustancia o producto según figura en el Anexo II.

La sustancia o producto que causa alergias o intolerancias se debe destacar por medio de una tipografía que lo diferencie del resto de la lista de ingredientes. Si no hay lista de ingredientes, la sustancia o producto que causa alergias o intolerancias se debe indicar por medio de la palabra “contiene + el nombre de la [sustancia (s)/producto (s)]”.

Cuando el nombre del alimento haga referencia claramente a la sustancia o producto que cause alergias o intolerancias, no es necesario etiquetar la sustancia o producto en cuestión.

La Comisión Europea reexaminará sistemáticamente y, en su caso, actualizará la lista de sustancias o productos que causan alergias o intolerancias.

La Comisión Europea deberá establecer las medidas de aplicación de la indicación voluntaria de la mención “puede contener”.

A continuación se hace mención de algunas de las desviaciones detectadas en las diferentes auditorías de certificación en relación al plan de control de alérgenos:

The presence of allergen nuts, is identified by cross-contamination by chocolate coated products and as an ingredient in biscuit reference. While is an appropriate cleaning, senses that don’t carry out analysis of allergen product or surfaces

Although there are an allergen management policy and generally is considered the management of allergens is suitable is detected that the values of allergens that can have the product that contains the statement have not been identified ""may contain traces of…"
Even though is the claim that the product may contain traces of allergen ""lactose"", detects that the value reference of the allergen as such has not been identified. As well as either the value of soybeans has been identified as such
It is detected that he is being promptly made reprocessing of NUGGETS pizza PANCAKES. Nuggets products use egg like ingredient, nevertheless the pizza pancakes does not use egg like ingredient
Is detected that while there has been a validation in relation to final (for lactose and gluten) product; is detected that not been a validation in relation to the cleaning of equipment for different allergens (eg. Fish).
The validation of allergen from the past 14.02.2012. A minimum frequency of allergen as such control has not been established.

Para más información por favor no dudad en contactar con:

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