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THE 2016 GLUTEN-FREE STAKEHOLDER UPDATE & PLANNING SESSION PRESENTED IN COOPERATION WITH:



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# HACCP, PRPS & KEEPING GLUTEN OUT

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# HACCP & PRPS: TOOLS FOR KEEPING GLUTEN OUT

## Identify: gluten

- Hazards: ingredients that contain gluten
- Risks: 20 ppm?
- HACCP: control

## Control/eradicate: tools

- Premises: air/flow
- Purchasing: supplier processes/risks
- Personnel/Training: change
- Cleaning and Sanitation:
- Equipment & Maintenance: cross
- Etc.

## Proof: verification

- Testing: sampling

Non-HACCP facilities?

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# HACCP OR NO HACCP

- There is a significant portion in the GFCP Manual detailing all 12 HACCP Principles as a guide for proper implementation. Also elsewhere it is mandated: 'Operations that have gluten in their facilities must have a documented HACCP plan that addresses gluten....'
- In another guideline it is also stated: 'Operations with a dedicated gluten-free facility may not need a HACCP program...'
- Not implementing HACCP appears to be a big difference between two facilities both may be making gluten-free products. Other than proving that HACCP is a significant tool to eliminate or control risks, this may also mean that:
  - The sources for gluten is largely 'external' at a dedicated site (Hazards)

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# WITH HACCP: HAZARDS - RISKS

- Hazard: gluten
  - Gluten in reception: wrong material sent
  - Gluten-contaminated incoming materials
  - Gluten-contamination of incoming materials at receiving
  - Gluten-contamination of materials during handling throughout the building
- Risks
  - How often contaminated?
  - How much contaminated?
  - What is the effect of this contamination (consumer/regulations)?

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# HAZARDS IN DEDICATED FACILITY: NO HACCP

- Hazard: gluten
  - Gluten in reception: wrong material sent
  - Gluten-contaminated incoming materials
  - ~~– Gluten contamination of incoming materials at receiving~~
  - ~~– Gluten contamination of materials during handling throughout the building~~

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# PREREQUISITE PROGRAMS (PRP)

PRPs are always established complete with monitoring/deviations/corrective actions; whether with HACCP or GFMS only. Examples:

- Premises:
  - exteriors-neighbors/interiors-building—ventilation
- Purchasing:
  - incoming materials
- Personnel/Training:
  - informed and alert allies on the floor/changes
- Cleaning and Sanitation:
  - prevention from cross contamination
- Equipment & Maintenance:
  - facilitation—cleaning—cross-contamination

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# PROOF: VERIFICATION

An effective management system with all the details does not eliminate the question 'what if....' without verification:

- is my brown rice flour safe?
- extend the question to other flours inherently gluten-free
- are documents such as 'Letter of Guarantee' sufficient?
- is my in-house rapid test as reliable?
- is the test method my external laboratory using valid?
- Other: inspection (at receiving, in storage, at shipping, labels, etc.)/ cross-docking

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# PROOF: VERIFICATION > TESTS

TEST KIT NAME	CATALOG NUMBER	ANALYTES
AgraStrip Gluten G12 Test Kit	COKAL0200AS	Gluten (prolamins, gliadin, secalin, hordein & avenins)
EZ Gluten	510EZG	Gluten
Aller-Tek Gluten ELISA	510821	Gluten
GlutenTox Pro	KT-5660 (25 analysis); KT-5288 (5 analysis)	Gluten, Gliadin
Elution Technologies Gluten Rapid Kit	GLTN-1005	Gluten
RIDASCREEN Gliadin	R7001	Gliadin, secalins, hordeins
Veratox Quantitative Gliadin R5 Test	8510	Prolamis from wheat (gliadin), barley (hordein) & rye (seccalin)

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# FINAL THOUGHTS

Do's and don'ts:

- Assessments:
  - Inputs: everything
  - What: a fly
  - Where: room 'c'
  - How: exhaustive analysis
  - Risk: 20 ppm or...
- Assumptions:
  - Inputs
    - Letter of Guarantee
    - Specifications

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?

- Questions?

- Thank you.

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