

MEMO: Food Allergens (Sesame)

Current FDA regulations under the Food Allergen Labeling and Consumer Protection Act (FALCPA) require food manufacturers to label food products that contain ingredients and/or proteins derived from one of the following nine food(s)/food groups:

- | | | |
|---------|-------------------------|-------------------------------------|
| 1. Milk | 4. Crustacean shellfish | 7. Peanuts |
| 2. Eggs | 5. Tree nuts | 8. Soybeans |
| 3. Fish | 6. Wheat | 9. Sesame ***Effective January 2023 |

Although more than 160 foods have been identified to cause food allergies in sensitive individuals, the “major food allergens,” listed above, have accounted for 90% of all food allergies.

Under the new Food Allergy Safety, Treatment, Education and Research Act of 2021 (FASTER Act), sesame was added to the list of “major food allergens” for which labeling disclosures are mandatory. Effective January 2023, food companies will be required to declare the presence of sesame on food packaging labels. According to the FDA, data suggests that the prevalence of sesame allergies in the United States appear to have increased and that there has been a high frequency of severe allergic reactions to sesame from products with undeclared sesame ingredients. The FDA is strongly encouraging manufacturers to voluntarily declare sesame as the 9th “major food allergen” on their product packaging prior to the required implementation date.

Upon the release of the 2021 FASTER Act, Whitsons proactively added sesame as the 9th allergen in all of our recipes, menus and on our FD Meal Planner platform. Since August 2022, all products containing sesame or its byproduct have had that allergen called out on our allergen reporting. To further support and address the increased incidents of allergic reactions to sesame, Whitsons continues to minimize the use of products containing this allergen and have eliminated the use of sesame oil and sesame seeds in all recipes.

For further information regarding the FDA sesame allergen policy, see the below link.

- [https://www.fda.gov/food/food-labeling-nutrition/food-allergies#:~:text=In%20November%202020%2C%20to%20help,such%20as%20tahini\)%20does%20not](https://www.fda.gov/food/food-labeling-nutrition/food-allergies#:~:text=In%20November%202020%2C%20to%20help,such%20as%20tahini)%20does%20not)

Sesame

Under the FASTER Act of 2021, sesame is being added as the 9th major food allergen effective January 1, 2023. Until that time, manufacturers do not have to list it as an allergen, although in most cases it must appear in the ingredient statement. An exception is when sesame is part of a natural flavoring or spice. Another exception is when sesame is not in the common or usual name of a food (e.g., tahini, which is made from sesame seeds). In November 2020, to help consumers who are allergic or sensitive to sesame to avoid these products, the FDA issued a draft guidance to encourage manufacturers to voluntarily declare sesame in the ingredient list when it is used as a “flavoring” or “spice” or when the common or usual name (such as tahini) does not specify sesame. The guidance is intended to help protect consumers who are allergic to sesame by encouraging manufacturers to identify all ingredients that contain sesame right now.

As a reminder, Whitsons’ Allergen and Special Dietary Needs Policies are listed on the following page.

Allergens & Special Dietary Needs

Vendor & Product Procurement Standards

Whitsons maintains meticulous records of all food products purchased through its systems companywide, not just in school nutrition. Part of Whitsons' approach to the marketplace is to manage the entire food supply chain, from origination through manufacturing, warehousing and delivery.

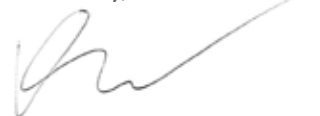
Whitsons School Nutrition's policy is to procure products that do not contain peanuts or tree nuts as an ingredient. For manufacturers that process peanuts and tree nuts, specifically, Whitsons gives preference to suppliers whose plants use separate equipment and separate rooms to process products that are free of these allergens. Regardless of preference, all suppliers must demonstrate adherence to our stringent vetting process and have Good Manufacturing Practices (GMPs) and effective Sanitation Standard Operating Procedures (SSOPs) in place to eliminate the possibility of cross-contamination from inadvertent allergens during the manufacturing process.

Whitsons thoroughly vets all manufacturer partners prior to receiving their products. The vetting process requires Letters of Guarantee, Certificates of Insurance and a completed Food Safety and Defense Questionnaire. These documents provide information regarding the suppliers' HACCP plans and allergen handling procedures. In addition, Whitsons requires that our manufacturing partners belong to the Global Food Safety Initiative (GFSI), which uses internationally recognized standards for GMPs, the highest safety and quality standards in the world. If not already certified, we provide a reasonable time period for our suppliers to obtain certification.

Periodically, our audit team reviews third party audit and QA inspection results and conducts random facility inspections at our suppliers' manufacturing plants to ensure GMPs are being followed. Manufacturers that do not continue to meet these rigorous standards are prohibited from remaining our partners.

Product specification sheets for each product that we source are carefully reviewed by the Purchasing and Nutrition Departments for accuracy. This information is incorporated into Whitsons' comprehensive recipe database, where we maintain information regarding ingredients, nutritionals and allergens for each menu item we serve. If you have any questions or concerns regarding sesame allergens, please feel free to reach out to me or your district manager at any time.

Sincerely,



Kelly Friend, CDM, CFPP, FMP, SNA CERTIFIED

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