

The VITAL Journey

17th November 2011

Allergen Bureau Information Session

Sydney, Australia

Overview

- **The “may contain” dilemma**
- **The Journey**
- **VITAL Revival**
- **Lessons Learnt**
- **The VITAL Future**





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Why we had to do Something

The "may contain" dilemma

- FSC silent on labelling of "cross contact" allergens
- Allergic consumers confused and take risks
 - Clinicians advising allergic consumers to ignore "may contain" statements
- Industry did not have a uniform process for determining when to use precautionary labelling



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Why we had to do Something

The “may contain” dilemma

- Industry was criticised for the inconsistent and often blanket approach to advisory allergen labelling.
- Medium to small manufacturers lacked the technical resources and expertise and would benefit from a tool to assist with allergen risk assessment.

VITAL Objective

- To provide a risk based methodology for food producers to use in assessing the impact of allergen cross contact and provide appropriate allergen precautionary (advisory) labelling.
- To avoid indiscriminate use of precautionary (advisory) labelling and thereby preserve its value as a risk management tool.





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What we Developed - VITAL Program

- Voluntary Incidental Trace Allergen Labelling
- VITAL is a risk based precautionary labelling system which uses **action levels** underpinned by scientific evidence
- VITAL is a:
 - a process, decision tree, grid (action levels) & calculator and;
 - promotes consistent labelling across industry by prescribing when a precautionary label statement is to be applied / avoided
 - one labelling approach 'May be present'
- VITAL was developed *BY* industry *FOR* industry and is adopted on a voluntary basis

Our Dream

Australia



New Zealand

Harmonised Action Levels

Imagine That! Is it Possible?

What it would Mean

- Consistent protection for all stakeholders
- Allergen labelling information would mean something to the allergic consumer, it had to be:
 - Relevant, ***consistent*** and easy to understand
 - Easily recognised by the allergic consumer
 - Cross contact statements would be based on the same action levels



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OUR JOURNEY





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VITAL Journey

July 04	Project Team formed
Jul 04 – Jan 06	Development of VITAL
Feb 06 – May 06	Stakeholder consultations & refinement
May 06 – Dec 06	VITAL Industry Pilots
Dec 06 – Feb 07	Draft for inclusion into revised AFGC Guide
Jan 07 – April 07	Targeted consultation on Action Level Grid
May 07	Finalise for AFGC Guide

THE LAUNCH

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Allergen Bureau

The Allergen Bureau is the first point of contact for questions on the management of food allergen risks in food ingredients and food manufacturing in Australia and New Zealand.

The Allergen Bureau shares information within the food industry on the management of food allergens so consumers receive relevant, consistent and easy to understand information on food allergens.

New Allergen Guide out now

If your company handles food ingredients, manufactures, imports, exports or retails food products you need the new revised 2007 edition of the Allergen Management and Labelling Guide including VITAL (Voluntary Incidental Trace Allergen Labelling).

[More information on the Allergen Guide](#)



VITAL system launched

The VITAL (Voluntary Incidental Trace Allergen Labelling) system has been launched as part of the new revised 2007 edition of the Allergen Management and Labelling Guide. VITAL is an essential tool for food producers.

[More VITAL information](#)



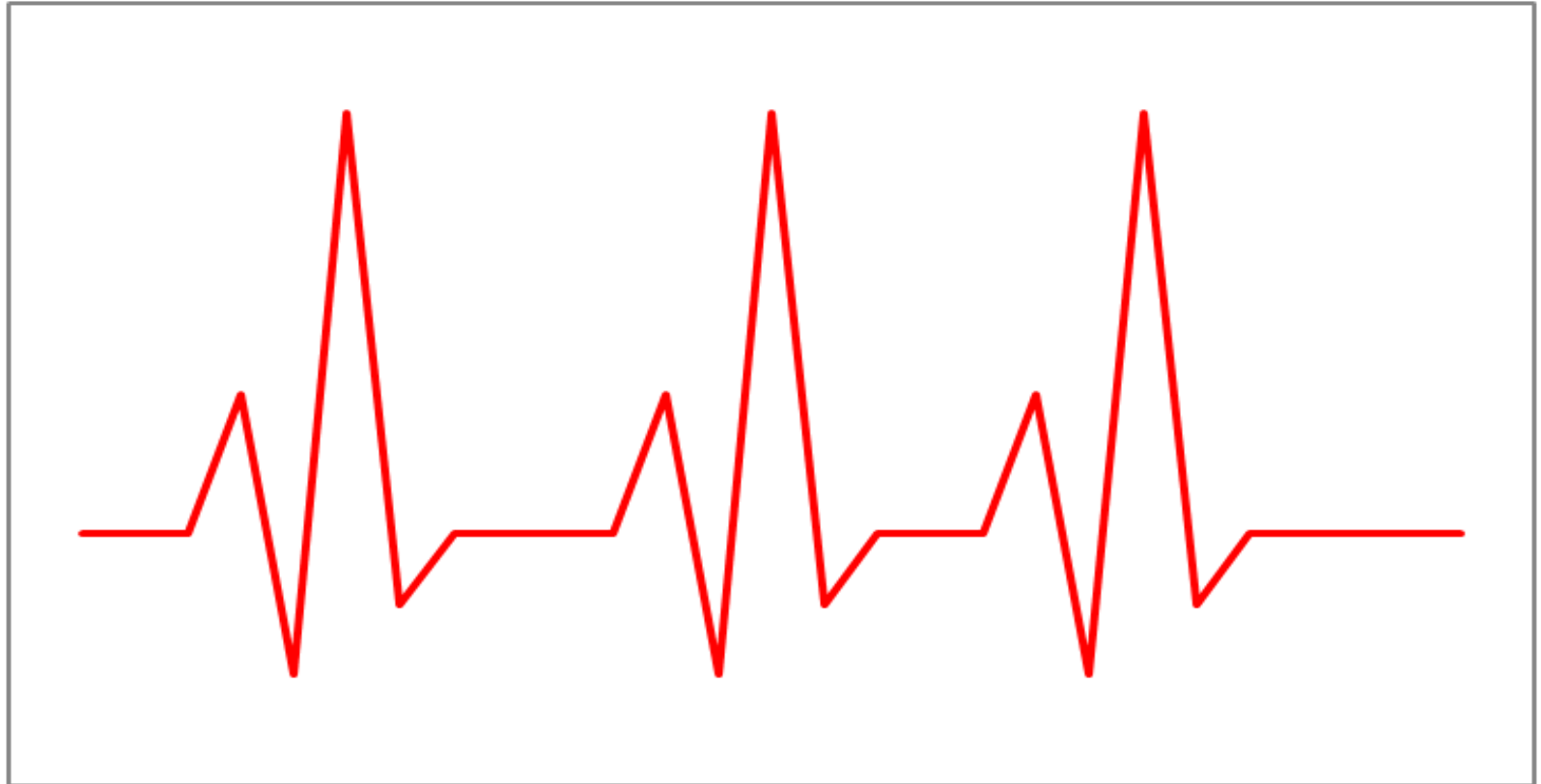
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VITAL Flat Lining (2010)

- Limited uptake across the industry
- Numerous barriers to implementation
 - large /small organisation impacts
- Clinicians created an environment of zero tolerance
- Many companies still not getting the fundamentals right
- There was so much more science to consider to underpin the grid cross contact levels

VITAL Revival



VITAL Revival

- VITAL Review initiated in 2010 – International interest
- Decision to look at the entire VITAL program and refresh
- A Scientific Expert Panel was convened to review the science underpinning the action levels in the grid
- Government Feedback & Support
 - FSANZ / Review of Labelling Law & Policy
- Development of a targeted VITAL Communication Strategy

Communication





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VITAL Communication Strategy

- Industry communication, what we are doing today! what has changed, what you need to know
 - Obtaining stakeholder input
 - Pilot phase (Calculator, Guidance Document & Procedure)
- Communication plan targeted at the allergic consumer, current advice:
 - “Don’t eat products which have a precautionary statement with an allergen to which you are sensitive”
- HCP stakeholder communication and management program

Lessons Learnt





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What went well

- All tools and information will be available for entire industry
- Dedicated VITAL support, single point of contact
- Consumer group collaboration was key – AAI, & Coeliac Society
- VITAL was developed at the same time that the allergen labelling format was developed with the AFGC (**bolding**)
- Training material developed and training providers sourced
- Penetration of the PIF, support provided to industry
- Government feedback positive no regulatory outcome

Our Learning's

- How does the consumer know if VITAL has been used if the product carries no precautionary label?
- Initial scientific review used only publicly available allergen data to determine Action Levels for the grid
 - Difficult to leverage wider support at the time
 - Where to obtain information & expertise?
 - Potential financial burden
- Grid stipulating 3 levels, added complexity & went too far
- Did not anticipate the impact of International organisations
- Process for evaluation of risks & the role of analysis not clear

A VITAL Future – Continuing the Journey

- Launch the updated VITAL Procedure, Grid (Action Levels) and Decision Tree (end 2011)
- Launch of the updated VITAL tools:
 - VITAL calculator,
 - FAQ's, examples and other supporting information
 - VITAL Training program
- VITAL calculator - a sub project of the VITAL revival
 - Updated excel based tool
 - Longer term project , working with GS1 to produce a sustainable tool that is web based, easy to use with a global footprint
- E-Commerce & Extended Labelling



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Summary

- VITAL was developed to ensure a consistent approach to precautionary labelling across industry
- It has been a successful and positive collaboration between industry and consumer groups and we continue to collaborate
- VITAL Revival encompasses, Procedure & Decision Tree, Action Level Grid – Scientific Review, VITAL calculator
- The scientific expert panel work has been instrumental
 - it underpins the credibility of the system and ensures there is a VITAL future
- Completion of the VITAL Revival project is end of 2011



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Dream becoming a Reality



**Global Harmonised Action Levels
Within Our Reach
Imagine That!**



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