

***Identification and evaluation of potential problems
with label and packaging control***



EAACI FAAM 17 February 2011
Venice, Italy

Overview

- Introduction
- **Why is labelling important?**
- Purpose and scope of allergen labelling
 - Types of labelling (mandatory and advisory)
- How is it done?
 - Management
- What can go wrong
- How do we manage when it does go wrong?
 - Recalls
- The future
 - Go Scan

Why is Food Labelling Important?

- Labels are a key way to help consumers differentiate between similar food products
- Key marketing vehicle for the product/brand
- Food labels are most commonly used by consumers to establish safety, hygiene and quality of the product (Food Standards Agency, *Public Attitudes Towards and Use Of, General Food Labelling, Unit Report 4, report prepared by Oxford Evidentia, FSA, London, 2010.*)
- Information on food labels becomes paramount if you are avoiding a particular food ingredient (eg allergens)

(Fee - see notes page)

Information on Food Label

- Mandatory, co-regulatory and voluntary information (ingredients, nutrition, allergens, amount of product, use, storage, company contact details, brand, product name/description/picture, barcode, expiry details, traceability/lot details, country of origin)
- Consumer value interests (Heart Foundation Tick, Sustainability (eg palm oil), Organic, Biodynamic, Vegan/Vegetarian, Dolphin-friendly, Pink Ribbon, Barn-Laid etc)
- Much information to fit on a small label – this makes product labels prime real estate
- TOO MUCH information – confusion, mistrust, scepticism



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Information on Food Label

- Food companies dedicate considerable resource to developing labels
- Labels may have input from
 - designer
 - marketer
 - legal
 - nutrition
 - quality assurance
 - product development
 - packaging technologist
- Labels are expensive to produce and incur substantial costs to design/print a new label

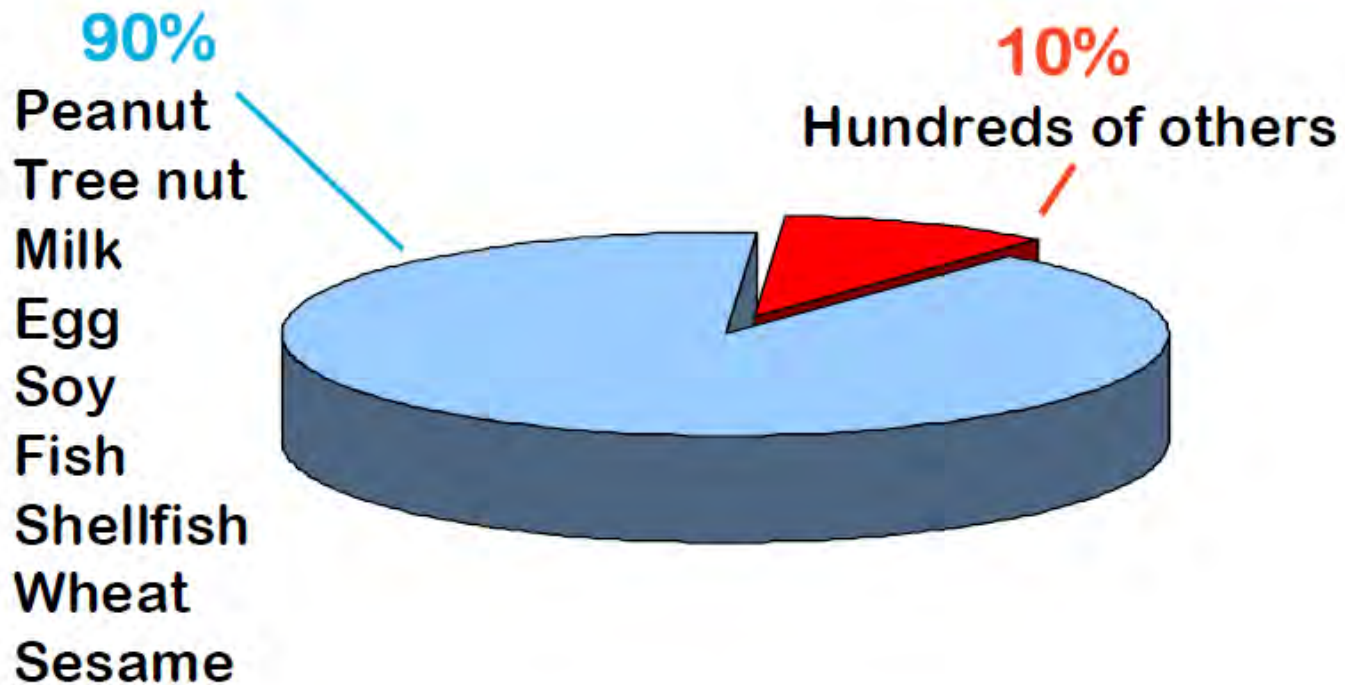
Information on Food Label

- Expense + Effort + Damage to Brand if there are errors = Food manufacturers aim to get labels correct
- Each line of the label is scrutinised and debated to ensure it meets all mandatory and other requirements
- Case study: Allergen Labelling

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Major Food Allergens



Why is Food Allergy important to the Food Industry?

- **Food allergies are increasing in prevalence, are potentially life-threatening and there is no cure**
- **Successful management is through avoidance of the food**
- **Consumers lives are at risk from eating formulated foods (hidden ingredients)**
- **Awareness, Education & Communication can prevent deaths & improve quality of life of food-allergic consumers**

“When food is your enemy, knowledge is your best weapon of defence” Anonymous, 2009

Proper labelling of food products, effective management of label inventories, control of ingredients from suppliers, and training of employees are key factors in allergen control.

Food-allergic patients must overcome significant obstacles on a day-to-day basis, including difficulties with the interpretation of food labels and never-ending concerns about improperly or incompletely labelled foods. Food-allergic patients must overcome significant obstacles on a day-to-day basis, including difficulties with the interpretation of food labels and never-ending concerns about improperly or incompletely labelled foods. (RA Wood, 2002)

Allergen Labelling – Australia/New Zealand – FF: pls see notes

- 2002 – introduction of mandatory labelling of certain allergens (gluten, crustacea, egg, fish, milk, tree nuts, sesame seeds, peanuts and soybeans). This covers **intentionally added** allergens only.
- Allergens which are added **unintentionally** are covered by precautionary labels, such as “May Contain”. These are voluntary declarations.

Precautionary Allergen Statements = “May contain” labels, allergen advisory statements or “trace” statements

What are Cross Contact Allergens?

- Residues or other trace amounts of an allergenic food unintentionally incorporated into another food that is not intended to contain that allergen
- Cross contact allergens
 - unavoidable
 - sporadic
- For example
 - processing due to cross contact with other products
 - ingredients due to cross contact in the supply chain (harvesting, storage, processing)

Allergen Labelling

- Limited guidance publically available for food manufacturers with regard to precautionary labels
- This created inconsistent allergen labelling and confusion and frustration for consumers
- In the 2011 report “Labelling Logic” commissioned to inform Australian food label policy, it has been recommended that a system such as Voluntary Incidental Trace Allergen Labelling (VITAL) be used

VITAL

- VITAL is a food industry-developed tool that sets out a process and criteria for determining the requirement for precautionary labelling of cross contact allergens.
- Procedure and tools for using VITAL are freely available on our website

VITAL Grid

Action Level 1: no declaration

Action Level 2: precautionary statement
“May be present: Egg”

Action Level 3: ingredient labelling



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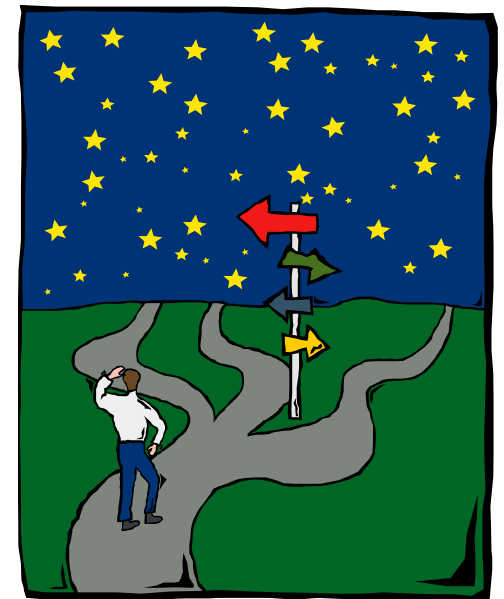
Labelling Review 2009- Summary

Precautionary Labels:

- 47% of foods surveyed had a precautionary label
- 34 different statements used

The “may contain” dilemma – the result

- Industry is criticised for the inconsistent and often blanket approach to precautionary allergen labelling.
- Allergic consumers confused and take risks
- Reduces the value of precautionary labelling as risk management measure





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VITAL and Consumers

- VITAL provides a consistent approach to assessing cross contact allergen risk
- Promotes consistency in allergen labelling
- Assist in making safe food choices
- VITAL encourages the elimination of cross contact allergens where possible within manufacturing or via material supplier
- Standard precautionary statement is used

RECOMMENDED LABELLING FORMAT EXAMPLE.

INGREDIENTS

Tree nuts specifically identified.

Water, vegetable oil, vinegar, cane sugar, tomato paste (5%), salt, **parmesan cheese** (2%), **egg yolk**, maize thickener (1412), **almonds**, red capsicum, **soybean oil**, garlic (1.0%), vegetable gum (415), spice, herbs, **wheat** cornflour, flavour (**wheat maltodextrin**, **sesame oil**), antioxidant (320).

Contains milk, egg, almonds, soy, **wheat** and **sesame**.

May be present: xxx.

Precautionary statement declared if appropriate. This statement must only be used in conjunction with VITAL.

Allergenic ingredients & derivatives declared in bold each time they appear.

Gluten source (grain source) qualified in ingredient list.

Summary statement listing all allergenic ingredients in the product as per Table to Clause 4 of Standard 1.2.3.

SR
SIGNATURE RANGE

White

SANDWICH BREAD

*Signature Range Breads use
only the finest ingredients.
Bread is a part of a balanced diet.*

INGREDIENTS:

WHEAT FLOUR, WATER, YEAST, IODISED SALT, CANOLA OIL, SOY FLOUR, EMULSIFIERS (471, 481), ACIDITY REGULATOR (263).

CONTAINS: GLUTEN, SOY.
MAY BE PRESENT: SESAME SEEDS.

STORE IN A COOL, DRY PLACE.

MADE IN NEW ZEALAND FROM IMPORTED AND LOCAL INGREDIENTS.

PRODUCTS YOU CAN TRUST AND QUALITY YOU CAN RELY ON. IF NOT FULLY SATISFIED, RETURN IT AND WE WILL GLADLY REFUND YOUR MONEY.

MANUFACTURED FOR:

S R BRANDS LTD., 80 FAVONA ROAD, MANGERE, AUCKLAND, NEW ZEALAND.

FOR PRODUCT ENQUIRIES:

NEW ZEALAND: 0800 728 4739
WWW.PROGRESSIVE.CO.NZ

82845

NUTRITION INFORMATION

SERVINGS PER PACKAGE: 11.5 (21 slices & 2 crusts)
SERVING SIZE: 61 g (2 slices)

| | Quantity per serving | Quantity per 100g |
|-------------------|-------------------------|----------------------|
| ENERGY | 500 kJ | 815 kJ |
| PROTEIN | 4.2 g | 6.9 g |
| FAT - TOTAL | 1.0 g | 1.7 g |
| - SATURATED | 0.2 g | 0.4 g |
| - TRANS | Less than 0.1 g | Less than 0.1 g |
| - POLYUNSATURATED | 0.3 g | 0.5 g |
| - MONOUNSATURATED | 0.4 g | 0.7 g |
| CARBOHYDRATE | 22.0 g | 36.0 g |
| - SUGARS | 1.5 g | 2.5 g |
| DIETARY FIBRE | 1.7 g | 2.8 g |
| SODIUM | 240 mg | 390 mg |

All values are considered averages unless otherwise indicated.



Woolworths logo

Hamburger Buns

Woolworths Home Brand offers great value for money on a wide range of quality everyday products. If you're not completely satisfied with this product, please return it for a full refund or replacement.



| Nutrition Information | | | |
|-----------------------|--------------------------|-----------------|----------------|
| Servings Per Package: | | | 6 |
| Serving Size: | | | 70g (1 Bun) |
| | Per Serving 70 g (1 Bun) | %DI*Per Serving | Per 100g |
| Energy | 770kJ | 9% | 1100kJ |
| Protein | 7.0g | 14% | 10.0g |
| Fat - Total | 1.2g | 2% | 1.7g |
| - Saturated | 0.4g | 2% | 0.6g |
| - Trans | Less than 0.1g | - | Less than 0.1g |
| - Polyunsaturated | Less than 0.1g | - | Less than 0.1g |
| - Monounsaturated | 0.6g | - | 0.9g |
| Carbohydrate | 34.7g | 11% | 49.5g |
| - Sugars | 1.6g | 2% | 2.3g |
| Dietary Fibre | 2.0g | 7% | 2.8g |
| Sodium | 310mg | 13% | 445mg |

Quantities stated above are averages only. *Percentage Daily Intakes are based on an average adult diet of 8700kJ. Your daily intakes may be higher or lower depending on your energy needs.

Made in New Zealand from Imported and Local Ingredients

Packed for Woolworths
1 Woolworths Way
Bella Vista NSW 2153
Australia

80 Favona Road
Mangere Auckland
New Zealand

www.woolworths.com.au
www.progressive.co.nz

82845



Ingredients: Wheat Flour, Water, Yeast, Wheat Gluten, Iodised Salt, Sugar, Canola Oil, Soy Flour, Emulsifiers (471, 481), Acidity Regulator (263).

Allergen Advice: Contains: Gluten, Soy.
May be present: Sesame Seeds.

Storage Instructions: Store in a cool, dry place. Product may be frozen for up to 3 months from date of purchase. Once thawed, consume within 5 days.

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Allergen Management (see notes)

Identify and manage allergens in (ever-changing) supply chain

- Which ingredients are from an allergen source?
What about allergen ingredients with no protein?
- Can you trust information from the supplier? Do they understand allergens? Do they understand your local regulations? Do you speak a common language?
- Cross contact allergens? Shared harvesting/storage/production of ingredients.
- Hidden allergens



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Allergen Management (see notes)

Identify and manage allergens during production

- Product scheduling
- Allergen Flow
- Cleaning Procedures (wet/dry)
- Line/People/Tools
- Training

Allergen Management (see notes)

Declare allergens on label

- Which allergens?
- Use VITAL?
- What format? Summary statement?
- Influence of company policy
- Target consumer sensitivity



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Allergen Management (see notes)

Label approval

- Multiple rounds of artwork approval
- All stakeholders

Allergen Management (see notes)

Get the right label on the right pack!

- 000's of labels to manage
- Ensure label changes when recipe changes
- Line clearance process between products
- Check appropriate label used
- All labels the same? Mixed labels.
- Barcode scanners

Allergen Management (see notes)

1. Identify and manage allergens in (ever-changing) supply chain
2. Identify and manage allergens during production
3. Decide method for declaring allergens on label
4. Label Approval
5. Ensure correct label goes on pack

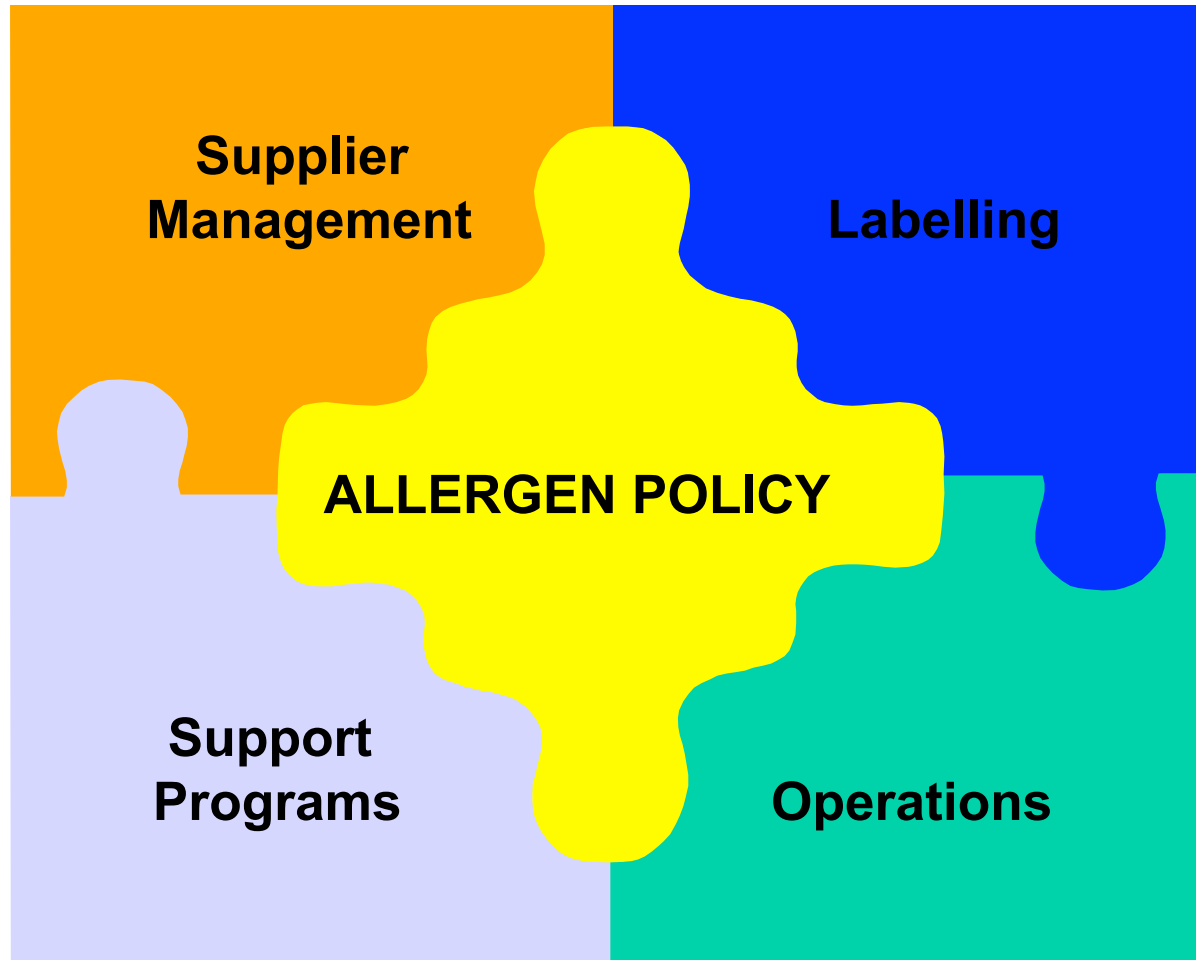
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Allergen Management Program





Allergen Labelling

- Label in a way that is useful to consumers:
- Consistent & Legible
- Near or in ingredients list
- Common English language
- Necessary detail eg. “sunflower oil” rather than “vegetable oil” so consumers know it is safe for them
- Avoid precautionary labelling such as “May contain”

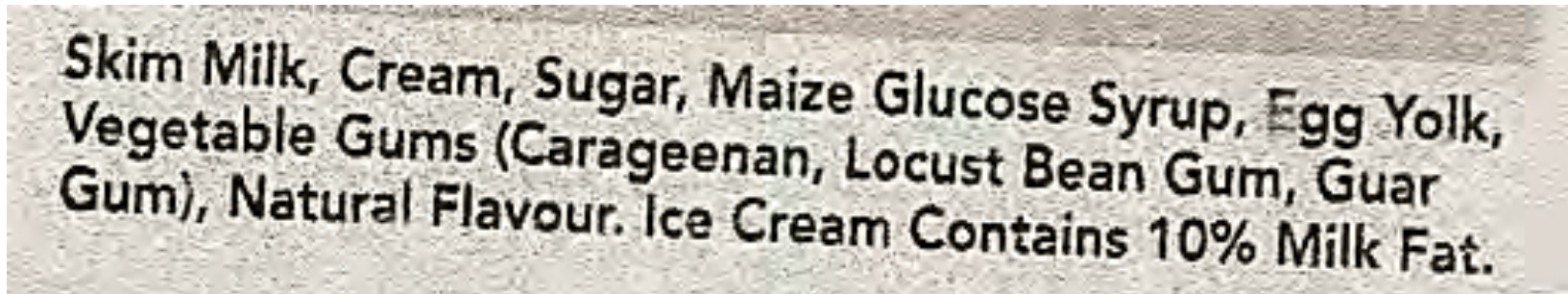
Recommended Labelling Format

Requirement for allergen labelling format that aims to help consumers by ensuring it is:

- ✓ *simple plain English*
- ✓ *unambiguous*
- ✓ *easily identifiable*
- ✓ *associated with or near the ingredient list*



Example



- Label has “Contains 10% Milk Fat”
- A consumer may incorrectly assume this is an Allergen Summary Statement and that this product contains milk as the only allergen
- A consumer may not realise that this also contains egg

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Peanut contamination of crumbed fish

- January 2011
- 6 reported cases of reactions from allergic consumers to different crumbed fish and crumbed seafood products
- Soy flour used in the crumb was contaminated with undeclared peanut protein





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Recalls

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Go Scan

**Allergen
Bureau**

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