Overview

- VITAL (101)
  - The issue
  - The industry solution
- What’s new Post Launch
- What the USA are doing
- Next Steps
  - Action level Grid Review
The “May Contain” Dilemma

- ANZFSC silent on labelling of “cross contact” allergens
- Industry did not have a uniform process
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 with the foods they choose to consume

- Reduces the value of precautionary labelling as risk management measure
The Industry Solution

Voluntary
Incidental
Trace
Allergen
Labelling

Launched June 2007 as part of the AFGC Allergen
The VITAL Process

• assessment of likely sources of cross contact allergenic substances from raw materials and the processing environment,

• evaluation of the amount present,

• review of the ability to reduce the allergenic material from all contributing sources,

• decision on precautionary labelling, and

• ongoing monitoring and verification
VITAL Decision Tree
(as at 12 June 2007)

1. Ingredient Impact and Processing Impact
   
2. Do the ingredient specifications indicate the possibility of cross contact for this allergen?
   
   No
   
   Yes
   
3. Particulate form
   
   6. Determine level of cross contaminated allergen in the final product from ingredients and from manufacturing process.
   
   7. Compare the concentration of allergens in the final product to the VITAL grid. Is the allergen above Action Level 1?
   
   8. Review contributors to cross contact and reduce where feasible. Is the revised level still above Action Level 1?
   
   No
   
   Yes
   
   No
   
   Yes
   
   Precautionary statement required
   
   9. "May be Present" statement is required
   
   10. Ingredient declaration required
   
   11. Precautionary statement required
   
   Yes
   
   No
   
   Yes
   
   No
   
   Yes
   
   No
   
   Yes
   
   12. Ongoing monitoring of ingredient and product processing to ensure validity of labelling. Take corrective action where required.
   
The VITAL Decision Tree must be used in conjunction with the VITAL Procedure.
# The VITAL Action Level Grid

<table>
<thead>
<tr>
<th>VITAL GRID</th>
</tr>
</thead>
<tbody>
<tr>
<td>as at 02 July 2007</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Allergen</th>
<th>Milk*</th>
<th>Egg*</th>
<th>Soy**</th>
<th>Fish*</th>
<th>Peanuts*</th>
<th>Tree Nuts*</th>
<th>Sesame Seed*</th>
<th>Crustacea*</th>
<th>Gluten#</th>
</tr>
</thead>
<tbody>
<tr>
<td>Action Level 1 (ppm)</td>
<td>&lt;5</td>
<td>&lt;2</td>
<td>&lt;10</td>
<td>&lt;20</td>
<td>&lt;2</td>
<td>&lt;2</td>
<td>&lt;2</td>
<td>&lt;2</td>
<td>&lt;20</td>
</tr>
<tr>
<td>Action Level 2 (ppm)</td>
<td>5 - 50</td>
<td>2 - 20</td>
<td>10 - 100</td>
<td>20 - 200</td>
<td>2 - 20</td>
<td>2 - 20</td>
<td>2 - 20</td>
<td>20 - 100</td>
<td></td>
</tr>
<tr>
<td>Action level 3 (ppm)</td>
<td>&gt;50</td>
<td>&gt;20</td>
<td>&gt;100</td>
<td>&gt;200</td>
<td>&gt;20</td>
<td>&gt;20</td>
<td>&gt;20</td>
<td>&gt;20</td>
<td>&gt;100</td>
</tr>
</tbody>
</table>

* mg/kg (ppm) of total protein

# Gluten includes all gluten type proteins as defined in the Food Standards Code

^The Action Level for soy is highly conservative
<table>
<thead>
<tr>
<th>Assumptions</th>
<th>INDEX</th>
</tr>
</thead>
<tbody>
<tr>
<td>Last Updated on:</td>
<td>06-07-07</td>
</tr>
</tbody>
</table>

**VITAL Grid, Notes, Decision Tree, Procedure**
- Table allowing the Allergen Advisory Action Levels
- Links to Explanatory Notes, Decision Tree & Procedure on how to use the Allergen Advisory Action levels

**Guidelines**
- Guidelines, Instructions and Assumptions about using this worksheet for calculations

**Assumptions**
- Worksheet to document any key assumptions when running this calculation

1. **Raw Material Impact**
   - Worksheet to calculate the allergen impact of the raw materials in the product

2. **Raw Material Cross Contact**
   - Worksheet to calculate the potential cross contact allergen impact of the raw materials in the product

3. **Processing Impact**
   - Worksheet to calculate the potential cross contact allergen impact of the processing and previous production on the same line

4. **Summary**
   - Summary Calculations for Worksheets 1, 2 & 3.

**Change Log**
- Log for to record all changes/additions

Please send all suggestions / notification of errors etc to: support@allergenbureau.net

VITAL Calculator
Precautionary Labelling Statement

Please Be safe.
Do not stand, sit, climb or lean on zoo fences.
If you fall, animals could eat you and that might make them sick.
Thank you.
Summary statement "Contains"

Larger 3mm font when space allows

Allergenic ingredients bolded

"Contains"

"May be present"

Cross contact statement using VITAL tool

"May be present"
POST VITAL LAUNCH
VITAL Pickup – Website Hits

January 2008

• 190 page views (average time spent on page - 1:21)

Last quarter reporting (1 Nov 07 to 31 Jan 08)

• 588 page views (average time spent on page - 1:20)

Since the new Website Design

• 2424 page views
VITAL Pickup - Registration

To date: 81 registrations

- Australia
- NZ
- US
- India
- Belgium
- UK
- Israel
- France
- Netherlands
What is Happening Overseas?

- USA
  - FAAN/Industry working group
  - GMA

- UK FDF

- Netherlands Government

- UK company
Overseas - USA

- Project Team similar to the VITAL team has been established

- Considering adopting a lot of the VITAL tools however they have had to modify the VITAL documents slightly to meet the requirements of the US Regulations:
  - Wheat not Gluten
  - Sulphites covered under a different part of the regulation
  - Sesame Seeds not included
  - Fish (includes species labelling eg. Bass, Flounder, Cod) does not include Molluscs (ANZFSC definition does include Molluscs)
  - Crustacean (Non Molluscs), includes Crab, Lobster, Shrimp but not Molluscan Shellfish eg. Oysters, Clams, Mussels or Scallops
Overseas - USA

• Issues raised by the working group:
  
  • Tree Nut definition & review (GMA/FPA, Tree Nut allergy review suggests science is supporting 9 tree nuts as an allergy issue not 19 under current FDA definition)
  
  • Additional references to support the action levels in the grid. Consider that they require more scientific evidence than the current Explanatory Notes
  
  • Particulate allergens – They consider that in some instances the VITAL tool can be used
  
  • Homogenous distribution of allergenic material is not necessarily reflective of production
Overseas - USA

- Considering not labelling for allergens if they are under the action level even if formulated into the product as an ingredient (e.g. soy lecithin, refined peanut oil)

- **ILSI** completing a literature review on peanut
  - Report due approx. September 2008
  - The values for peanut in the VITAL Grid will be reviewed post report

- All other allergen levels will stay the same as the peanut levels unless they can be based on other standards e.g. 20ppm for Gluten.
Products in the Market

WATCH THIS SPACE
Next Steps

- Cross contact information from suppliers of ingredients (PIF)
- Communication and Implementation strategy
  - Allergic Consumers
  - Industry – Training Package
Training - VITAL

- Partnership with Advancing Food Safety (AFS) secured

- The AFS relationship meant that VITAL could be developed into an industry based program quickly

- Training can be delivered in house

- Professional trainers delivering the program

- A knowledge of VITAL will be required by many different people/roles within an organisation
  
  - Company representatives to be trained together
  
  - Team approach to implementation

- Contact AFS directly or via their website to register for training
Training - VITAL

http://www.haccptown.com
Next Steps

• Food Safety Auditors

• Allergen testing methods and interpretation

• Allergen Recall data collection

• Monitoring use and (ab)use of Vital

• Vital resources
  • www.vitalallergy.com
  • Q & A
  • Worked examples

• Vital Review
Next Steps

- Vital Review
- Decision Tree
- Procedure
- Vital Grid
- Calculator - upgrade
QUESTIONS??