



Allergen Bureau
Partnering in Global Challenges
Allergen Labelling Survey & PIF

Kirsten Grinter
Regulatory & Scientific Affairs Manager, Nestlé
Member, Management Committee

Outline

- **Allergen Labelling Survey**
 - **Why we are conducting another survey ?**
 - **Survey Methodology**
 - **What will the survey uncover ?**
 - **How will we react as an industry ?**
- **Product Information Form (PIF)**
 - **PIF – Where & when did it all start ?**
 - **PIF review**
 - **What is in scope ?**

Why are we conducting another Survey?

- Reviewing our allergen labelling practices is critical, Why? The Sensis Consumer report (March 2009) reported that:
 - Food allergies are a topical concern for Australian families
 - 1 in 5 Australian Households reported having food allergy sufferers with milk or dairy products reported as the most common allergy
 - Data shows that more people think they have an allergy than do in reality however this is irrelevant as far as purchasing is concerned
 - If they think they have an allergy, they shop as if they have an allergy, so more people are using the label as an information source
 - Greater need for accuracy and consistency across the industry

Why are we conducting another Survey?

- A commitment was made to repeat the labelling survey on completion of the first allergen labelling review report in April 2006
 - The original survey assisted the review team to define the scope of the review and set the important parameters
 - Repeating the survey will allow us to measure our success or identify gaps and areas for improvement or communication enhancements or educational support
 - It was noted in the April 06 Final report that it was going to take manufacturers a significant amount of time to adopt the labelling formats recommended and to see a change in the Market
 - The original survey was quite extensive covering many aspects of allergen label communication
-

Allergen Labelling Survey (end 2005)

- Extensive Supermarket category review
 - Allergen information collected for several products within each category (approx 350)
 - Inconsistent representation evident throughout each category
 - Summary (Contains) & Cross Contact statement details location
 - Allergen summary (Contains) statement (21)
 - Allergen cross contact statements (42)
 - Upper Case (59%), plain English (84%)
 - Also looked closely at other specific labelling attributes like font colour, colour contrast, print size, font style
 - The Survey data helped us identify the recommended labelling format
-

Proposed Survey Methodology

- Survey information will be collected across defined Retail product categories similar to those used in the 2005 survey, shelf stable
- Aim is to obtain a snapshot view of where the industry is at in terms of adoption of the AFGC Food Industry Allergen Management & Labelling Guide and VITAL
- **Focus on the specific parameters outlined in the AFGC Food Industry Allergen Management & Labelling Guide**
 - **Important parameters to be considered in the review are:**
 - Allergen terms used (plain English description)
 - Bolding, Qualified source labelling
 - Summary Statement (Contains)
 - Cross contact statement (VITAL or other?)
- Potential to use Students to compile the Survey information, time consuming task
- Allergen labelling survey will be held at the NSWFA Offices at the end of April. Timing for completion of the survey report is end August 2009

What will the Labelling Survey uncover ?

- Strong industry adoption of the AFGC Food Industry Guide to Allergen Management & Labelling and VITAL ?

or

- Growing industry adoption/implementation ? Evidence that industry is taking advantage of the developed Tools. Barriers perhaps ?

or

- Industry slow to implement the Tools ? Barriers to implementation?
-

How will the industry Survey link with FSANZ Survey ?

- FSANZ Survey 'Consumer Survey on Food Labelling' focuses on the allergic consumer and their expectations
- The Allergen Bureau Labelling Survey focuses on reviewing the industry practices
- Need to compare survey findings and see if there is alignment between the consumer and industry, if not then:
 - Excellent piece of information to guide us in closing the gaps and meeting our target consumer needs

How will the Allergen Bureau react?

- No matter what the result of the survey is we will most likely need to do more as far as raising the visibility of the industry Tools
- Educational Tools, Guides perhaps ?
- Industry Stakeholder consultation ?
- Development of communication material ?

How will Industry react?

- If the uptake of the Tools is slow and evidence in the market limited, will we change what we are currently doing?
 - What will make us change ? Ideas from industry ? Understanding the barriers to implementation
-

Allergen Labelling Review Team

- Georgina Christensen (VITAL Coordinator)
- Jenni Cooper (Heinz)
- Fiona Fleming (George Weston Foods)
- Kirsten Grinter (Nestlé)

And potentially looking for some Student support

PIF – Where did it all start?

- March 2005 the AFGC Allergen Forum survey of 368 food businesses found that most companies required suppliers to provide information and most companies had their own forms which were all very similar, but forms were all different, resulting in costs and inefficiencies for suppliers and customers:
 - 50% of companies stated suppliers took >2 weeks to return forms
 - 20% of companies needed to follow-up 50% of returned forms.
- Overwhelming support for a single electronic form to be developed to reduce costs, reduce time and reduce errors

PIF – When did it all start ?

- The form is designed to provide a single template to replace the numerous company-specific information forms used across the food supply chain between suppliers and manufacturers.
- It was launched in February 2008 and has seen a dramatic take-up by manufacturers and suppliers throughout Australia and New Zealand.
- Initially developed as a Word document, it has been further developed as an Excel Form to improve speed, compatibility and enable import and export of data electronically.
- Increasingly companies are seeing this form as a key component in addressing traceability and quality requirements.

PIF Review

- There has been a lot of Member and non- member feedback regarding the PIF form and its use throughout industry
- PIF needs to stay relevant to the industry needs and needs to keep progressing
- Level of frustration experienced about different sections within the PIF form and with regard to the general use of the form. Initial concerns around:
 - slowness of the form
 - difficulty of importing and exporting from a database which prompted development of an alternative template using Excel spreadsheet

PIF Review

- Many questions received around
 - Can the form be used as a Finished Product Specification?
 - Can we look at upgrading the platform ?
 - Options for increased flexibility and additional questions to be included ?
- Electronic working group for the majority of the review however there may be a need for a face to face meeting
 - Large team so the aim may be to split the group to focus on specific sections to obtain feedback

PIF Review Scope ?

- Currently defining the scope of the work that will be included in the Review
 - Review current questions relevant to ingredient information
 - Are the questions clear?, superfluous?, do we need additional questions?
 - Additional categories? Or sections required?
 - Review scope of the questionnaire
 - Can it be used as a Finished Product Specification? Separate form altogether?
 - Review form efficiency
 - Form useability
 - Importing and exporting data or use of XML format ?
 - Review use and application of the platform
 - Is there a more effective alternative?
 - Potential internet central data repository ?

PIF Review Team

- Allergen Bureau
 - Arnott's
 - Cadbury
 - Cerebos
 - Fibrisol
 - Fonterra
 - Foodtek Services NZ
 - Goodman Fielder
 - Heinz
 - Georgina Christensen
 - Michael Depalo
 - Elesha Kelly
 - Patrica Verhoeven
 - Roy Pereksles
 - Peter Bristow
 - Bruce Cameron
 - Lauren Caruana
 - Lisa Warren
 - Kerry
 - Kraft
 - Nestlé
 - Parmalat
 - Sanitarium
 - Sugar Aust.
 - Sunrice
 - Unilever
 - Asha Chandra
 - Alan Poynton
 - Kaye Wood
 - Patrice Whitehouse
 - Claire Heenan
 - Ron Weibrecht
 - Phillip Williams
 - Kim Brodie
- Businesses supporting the PIF, Businesses supporting PIF implementation

Kirsten Grinter (Nestlé) (Chairperson)

Kim Leighton (AFGC) (Secretariat)

Allergen Bureau Vision

Our vision is to continue to be the primary industry resource dedicated to:

- *meeting industry and consumer requirements for relevant & consistent allergen-related information*
- *assisting in the management of risks associated with food allergens in food ingredients and manufactured foods*

Next Steps

- The Allergen Bureau works by providing leverage for membership investments!
 - It is important to honour our vision of meeting industry and consumer requirements for relevant & consistent allergen-related information
 - Completing the Allergen Labelling Review and PIF review is only one part of the picture the other part is reacting to the information or feedback received to remain a relevant force within industry
 - The Labelling survey report will be sent to Allergen Bureau Member Companies and posted on the website
 - A consultation paper will be prepared at the completion of the PIF review to provide an opportunity for Members and Non Members to comment on recommendations
-