

# informing the food industry



# Incidental Trace Allergen Labelling

Roger Bektash & Julie Newlands

'Food Allergens – Science & Challenges'
ILSI SEAR April 2015



# **Allergen Bureau**

# **Our Objective**

Protecting the allergic consumer Protecting the food industry



# **Our Challenge**

Consistency & industry alignment

# **Our Engagement**

One Program, Harmonised Action Levels Scientific Validity, Training and Support



# Why Allergen Bureau?

- Inconsistent use of Allergen Risk Assessment
- Proliferation of cross contact statements across the industry, survey of 350 products in 2005 revealed 42 creative statements!
  - May contain ...... Made on the same line.....
     Made in the same factory/facility.....
- Allergic consumers were ignoring cross contact statements
- Action levels varied between manufacturers, no consistency
- SO → Industry Guidance and Standards were needed



# **VITAL<sup>®</sup> Experience**

- Allergen Bureau Industry initiative 10 years ago
- Allergen Risk Assessment tool
  - Fundamental, Science based and Pragmatic
  - sound basis for Industry self-regulation
- VITAL developed ACTION LEVELS
- The VITAL Scientific Expert Panel VSEP
- VITAL 2.0 VITAL Online, Training, Identity
- Future Global engagement





# Allergen Bureau – Who we are

- Established in 2005 due to industry demand, Management Committee, now a 'Not for Profit' organisation
- The food industry are our Members! We have 27 Full Members plus 11 Associate and 8 Individual members
- The Members steer the resources & projects

#### Our reason for being

Share information & experience in the management of food allergens by developing tools to support industry with the needs of the allergic consumer at the forefront





## Allergen Bureau Management

#### Allergen Bureau ('Not for Profit')

#### **The Board of Directors**

- Robin Sherlock (DTS)
- Roger Bektash (MARS)
- Julie Newlands (Unilever)
- Kirsten Grinter (Nestlé)

#### **Our support network**

- VITAL® Coordinator /support (Georgina Christensen & Lisa Warren)
- Technical expertise (Simon Brooke Taylor & Lyn Davies)
- VITAL® Scientific Expert Panel (VSEP)
- Allergen Bureau advisors (David Henning & Fiona Fleming)

**Funded Secretariat** 







# What we Developed - VITAL® Program

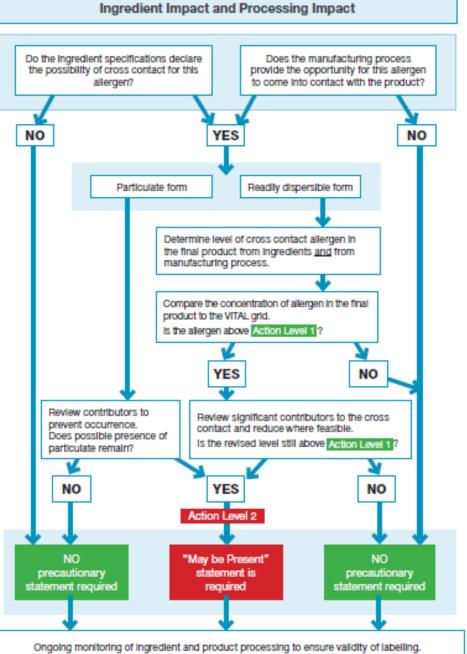
- Voluntary Incidental Trace Allergen Labelling
- VITAL is a risk assessment process to determine appropriate precautionary labelling which uses action levels underpinned by scientific evidence
- VITAL Program comprises:
  - Is a <u>risk assessment</u> process, decision tree, grid (Action Levels) & calculator;
  - Promotes consistent labelling across industry by prescribing when a precautionary label statement is to be applied / avoided
  - Delivers one consistent labelling approach 'May be present'
- VITAL was developed BY industry FOR industry and is voluntary



#### Allergen Risk Assessment **Decision Tree**

- the fundamental first step

Ingredient specification already identifies Intended Allergens in Ingredient List



Take corrective action where regulred.





# **Getting to the Heart of VITAL®!**

- Knowledge of all parts of the supply chain
  - From raw materials, storage, manufacturing & distribution
  - Harnessing the value of physical risk review and analysis to validate management decisions and assumptions
  - To Communicate accurately and consistently to the allergic consumer



# **Scientific Expert Panel**

- VSEP collaboration
  - The Allergen Bureau;



- FARRP (Food Allergy Research and Resource Program (University of Nebraska) and;
- TNO (Netherlands Organisation for Applied Scientific Research)

Action Levels in the VITAL Grid & Underpinning science



### **VITAL<sup>®</sup> Scientific Review**

- Established the Level of acceptable risk, protection for vast majority
  - Reiterated that exquisitely allergic consumers are not accounted for in VITAL, continue to assume they do not eat processed foods
- Established Principles to determine Action Levels that are;
  - Scientifically & clinically sound, defensible and transparent
- Established the **Importance of Portion/Serving** Size
  - Allergen protein expressed as <u>mg of protein</u> as well as a <u>concentration in reference quantities or serving size</u>
- Review Action Levels
  - The more data the more confidence in the model
  - Lack of data drives further research





# VSEP - Reference Doses an initiative of the Allergen Bureau or an initiative of the Allergen Bureau

Allergen	Protein Level (mg)				
Peanut	0.2				
Milk	0.1				
Egg	0.03				
Hazelnut	0.1 (VITAL – Level used as generic tree nut value)				
Soy	1.0 (VITAL – Soy flour derivatives not soy milk)				
Wheat	1.0 (VITAL – GCC (Coeliac & wheat allergic population)				
Cashew	2.0 *(VITAL - Hazelnut as generic tree nuts value)				
Mustard	0.05				
Lupin	4.0				
Sesame	0.2				
Shrimp	10.0				
Celery	NA				
Fish	NA (VITAL – original VITAL value applied)				





# VITAL® 2.0

- Procedure (Guidance document) & decision tree
- VITAL Calculator (on-line from July 2015)
- VITAL Action Level Grid (incorporated in the VITAL Calculator) (VSEP Reference Dose)
- FAQ's and support documentation



# **VITAL<sup>®</sup> Program**

- Guidance Document more detailed
- Definitions & expanded explanations
- Attempts to avoid common mistakes
- Includes detailed information about allergen analysis
- Available on our website

http://allergenbureau.net/



informing the food industry

Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL) Program Version 2.0









23 April 2012





## **Action Level Concept**

- VITAL 2.0 uses Action Levels
- Action Levels guide labelling recommendations
- VITAL 2.0 has 2 Action Levels and an interactive VITAL Action Level Grid

**Action Level 1 -** precautionary cross contact statement is <u>not</u> required

Action Level 2 - precautionary cross contact statement is required

"May be Present: XXX"

# Allergen Bureau

#### **VITAL Action Level Grid**

#### Reference Amount / Serving Size ?

40

#### Action Level 1 Action Level 2

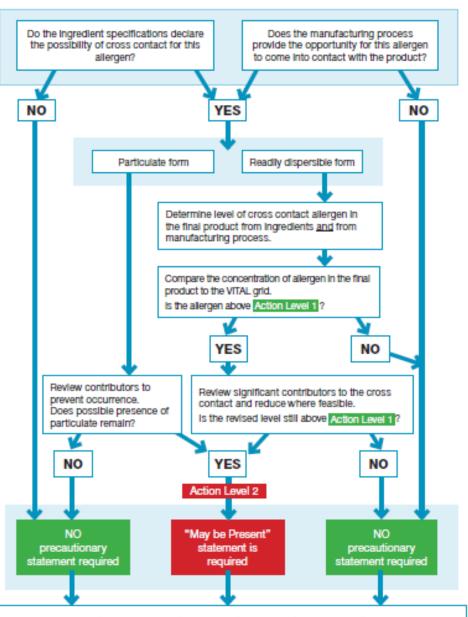
Almond	<2.5 ppm	≥2.5 ppm		
Brazil nut	<2.5 ppm	≥2.5 ppm		
Cashew	<2.5 ppm	≥2.5 ppm		
Hazelnuts	<2.5 ppm	≥2.5 ppm		
Macadamia nut	<2.5 ppm	≥2.5 ppm		
Pecan	<2.5 ppm	≥2.5 ppm		
Pine nut	<2.5 ppm	≥2.5 ppm		
Pistachio nut	<2.5 ppm	≥2.5 ppm		
Walnut	<2.5 ppm	≥2.5 ppm		
Wheat	<20 ppm	≥20 ppm		
Rve	<20 ppm	≥20 ppm		
Barley	<20 ppm	≥20 ppm		
Oats	<20 ppm	≥20 ppm		
Spelt	<20 ppm	≥20 ppm		
Egg	<0.75 ppm	≥0.75 ppm		
Crustacea	<25 ppm	≥25 ppm		
Fish	<2.5 ppm	≥2.5 ppm		
Milk	<2.5 ppm	≥2.5 ppm		
Peanut	<5 ppm	≥5 ppm		
Sesame seed	<5 ppm	≥5 ppm		
Soy	<25 ppm	≥25 ppm		
Lupin	<100 ppm	≥100 ppm		
Mustard	<1.25 ppm	≥1.25 ppm		
, rescent u	TIZO PPIII			



Substances	Reference Dose (mg)	Action Level (ppm) where Reference Amount / Serving Size is 50g		Cross Contact Amount		· Labelling Outcome		
		Action Level	Action Level 2	Particulate	Readily Dispersible (ppm)	Labelling Outcome		
Tree Nuts (Total)	0.1	<2 ppm	≥2 ppm					
Almond		•••						
Brazil nut								
Cashew								
Hazelnuts								
Macadamia nut								
Pecan								
Pine nut								
Pistachio nut								
Walnut								
Gluten-containing cereals (total)	1	<20 ppm	≥20 ppm			Intentionally Added		
Wheat						Intentionally Added		
Rye								
Barley								
Oats								
Spelt								
Egg	0.03	<0.6 ppm	≥0.6 ppm			Intentionally Added		
Crustacea	1	<20 ppm	≥20 ppm		0	Action Level 1		
Fish	0.1	<2 ppm	≥2 ppm		160	Action Level 2		
Milk	0.1	<2 ppm	≥2 ppm			Intentionally Added		
Peanut	0.2	<4 ppm	≥4 ppm		0.1	Action Level 1		
Sesame seed	0.2	<4 ppm	≥4 ppm	YES	8.8	Action Level 2		
Soy	1	<20 ppm	≥20 ppm		0.5	Action Level 1		
Lupin	Not assessed							
Mustard	Not assesse	Not assessed						

#### Allergen Bureau informing the food

#### Ingredient Impact and Processing Impact



Ongoing monitoring of ingredient and product processing to ensure validity of labelling. Take corrective action where required.





# **Status Today of VITAL® 2.0**

- VITAL 2.0 has been well accepted by Industry, Allergic Consumer Associations & Authorities
- Being adopted Internationally
- Feedback from industry has helped to make the calculator run more smoothly
- The food industry training providers use VITAL 2.0
- The Allergen Bureau continues to provide resources & support for the industry – and VITAL On-line web-based calculator

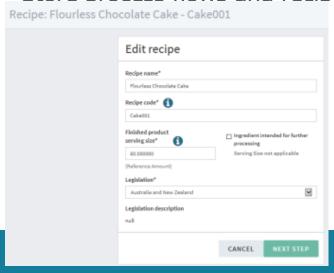


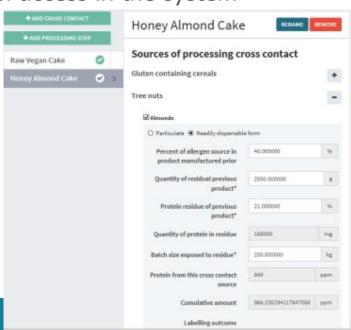




# Project - VITAL® Online

- Wizard-style input, user-friendly
- Multiple platform compatibility (eg. PC & Mac; tablet & iPad)
- Online or offline storage
- Updated centrally, updates easily applied to existing calculations
- Companies can create users and control access in the system
- Create and save ingredients online
- Store process flows and recipes









# Training

# How you can be Engaged





# **Global Partners & Training Collaborations**

- Partners to support and facilitate VITAL implementation
  - BRC & FDF interest in being an Allergen Bureau Partner
- Goal is for Trainers to be managed though our Partners
- Training collaborations growing very quickly
   Currently 16 <a href="http://allergenbureau.net/vital/vital-training/">http://allergenbureau.net/vital/vital-training/</a>
- Ongoing industry engagement & connection
- Critical to long term success
   (Global consistency in approach & labelling)







# VITAL® 2.0 - What Success Looks Like

- A VITAL Procedure, tools & support material and services that are *globally relevant*
- The science that underpins the reference dose/action levels remains current through VSEP ongoing interaction
- Growth through global partners and training collaborations
- Continuous development of VITAL as the industry and the program evolves





- VITAL was developed to ensure a consistent approach to Risk Assessment and precautionary labelling across industry
- It has been a successful and positive collaboration between industry and consumer groups and we continue to collaborate
- VITAL program provides: Risk assessment Procedure & Decision Tree,
   Action Level Grid Scientific Review, VITAL calculator
- The VSEP underpins the scientific credibility of the system
- A basis for strong Industry Self-regulation
- VITAL journey will continue!







# Go back to your primary Risk Assessment

Substantiate & invest in your platform &

**Stay Engaged** 







# Thank you

For further engagement and information:

- Visit the Allergen Bureau website <u>www.allergenbureau.net</u>
- Join Us and enjoy the benefits of the Allergen Bureau membership www.allergenbureau.net/about-us/join-us/
- Subscribe to our free monthly Allergen Bureau eNews www.allergenbureau.net/news/
- Access the Allergen Bureau HelpLine
  - email: info@allergenbureau.net
  - Phone: +61 437 918 959 (International)
- Attend our Allergen Management & VITAL® Training Day, 11 May 2015, Sydney, Australia
- Register for the Food Allergen Management Symposium 2015 (FAMS2015) 12-14 May 2015, Sydney <a href="https://www.fams2015.com.au/">www.fams2015.com.au/</a>