



Food Allergen Management and issues for SME's

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The Food Technology Association of Australia is a major food industry body for Companies involved with the food industry in Australia. Although FTAA is based in Victoria it has members throughout Australia. The organisation, formerly part of the Council of Australian Food Technology Associations, dates back to 1949. In 1995 it became an independent Victorian Association and in 2007 became a National Organisation by combining with FTA NSW.

The membership ranges from small individual Companies to some of the biggest manufacturers. FTAA aims to run at least two technical workshops or courses per year and has a recognised and experienced Technical Committee which reviews and comments on proposed or amended Food Legislation on behalf of its members.



The 2015 FTAA Technical Symposium on Food Safety run in conjunction with the CSIRO included several papers on allergens. Feedback from the delegates indicated there was a need for a guidance document on Allergen management in the food plant – particularly for Medium to small companies.

As a result of this a survey to collect concerns was sent to FTAA Members.

This then resulted in the decision to embark on a project to eventually publish these guidelines with the help of the many organisations (many who are present at this conference)



The original draft outline for the publication would include : -

- **ALLERGENS, background, analysis, limit of detection.**
- **ALLERGENS - statutory labelling requirements, Requirement for Certifications(including major retailers).**
- **RISK ASSESSMENT PROTOCOLS FOR THE FOLLOWING:-**
- **INGREDIENTS AND INGREDIENT MANUFACTURING PLANTS**
- **STORAGE OF INGREDIENTS**
- **PRODUCTION LINES (SINGLE OR MULTIPLE USE)**
- **STORAGE OF FINISHED GOODS**
- **FOOD SERVICE GUIDELINES AND REQUIREMENTS**
- **LABELLING & PRECAUTIONARY LABELLING.**



- The circular sent to all FTAA members (including to UNSW – Prof Alice Lee) led to me being here today – Thank you Alice.
- I am here to learn but more importantly to make contact with experts who are willing to partner in this project – for the reasons to be outlined in the following slides.



It is difficult to obtain actual numbers of SME's including catering establishments that need to be allergen aware conservatively it could be between 80000 and 100000 (including approx 20000 importers of food products into Australia).

We cannot find a source of these and can only surmise that local /State Authorities and Customs would be the major source.



Thus the challenge is Twofold : -

1. Produce a publication to be understood with no technical background whatsoever and
2. To distribute this document widely



**Offers of Collaboration will be
greatly accepted**

- my email is on the abstract .



Now to some concerns



- A RECENT FSANZ PUBLICATION INDICATED THAT THERE WERE 61 ALLERGEN RELATED RECALLS IN 2016 – VERY CONCERNING
- INCLUDING SUPERMARKETS BELIEVE ALL WERE SME's (NOT CONFIRMED) BUT TO ME ONLY ONE WAS A RECOGNISABLE COMPANY NAME – VERY CONCERNING
- BEING SME's THE MAJORITY ARE HIGHLY UNLIKELY TO REALLY APPRECIATE THE ROOT CAUSES OF PROBLEMS - VERY CONCERNING
- SPECIFICATIONS, QA AND QC TRADITIONALLY LIST ATTRIBUTES THAT ARE EASILY MEASURED (ACIDITY, MICRO, TASTE ETC) – NOW THEY ARE EXPECTED TO CHECK WHAT IS NOT THERE – VERY CONCERNING AND CONFUSING.



- THE DEPT AGRIC FAILING FOOD REPORT FOR DEC/JAN/FEB INDICATED 54 PRODUCTS FAILED IN THIS PERIOD (NO ALLERGENS RECORDED).
- PRECAUTIONERY LABELLING OF ALLERGENS IS AN EXTREMELY COMPLEX PROCESS AND CRITICISM OF THIS IS CONSTANTLY RECEIVING BAD PRESS. EASY TO USE PROTOCOLS ARE PARTICULARLY IMPORTANT HERE.



MAJOR CONCERNS RAISED BY COMPANIES

- ACCURACY OF IMPORTED LABELS
- ACCURACY OF IMPORTED DOCUMENTS/PIFS OF IMPORTED INGREDIENTS
- UNDERSTANDING BY IMPORTERS INTO AUSTRALIA OF PRODUCT STANDARDS
- AWARENESS OF WAREHOUSING & DISTRIBUTION SPILLS RE ALLERGENS
- CORRECT DOCUMENTATION/PROCESS/RECIPES LEADING TO LABEL APPROVAL
- INPLANT CONTROL OF ALLERGENS WAREHOUSING/DISPENSARY/FILLING LINES/ CHILLERS/FREEZERS/PACKAGING LINES/ STORAGE AND HANDLING SPILLS
- COMMON EQUIPMENT/STORAGE CONTAINERS, SCOOPS ETC
- CHECK AND CONTROL OF LABELS IN STORAGE AND USE
- LEVELS OF ALLERGEN TESTING SUFFICIENT FOR VALIDATION
- FALSE POSITIVES AND LEVELS OF DETECTION AND RESULTS RELIABILITY
- LACK OF IN PLANT TRAINING



- We believe that a Document in question could remove the mystique of risk assessment, simplify the understanding of the importance of allergen management and consequently reduce the occurrence of undeclared allergens.

Thank you

