

Allergen Management – The View and Experiences of DFSV

FAMS2017

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Overview

- DFSV and our Key Functions.
- Regulatory obligations of manufacturers.
- What is an allergen management program?
- Elements of an allergen management program.
- What a Food Safety Manager is reviewing at audit.
- What a good allergen management program looks like.
- Case studies.
- Typical non-conformances / CARs

Dairy Food Safety Victoria



- Dairy Food Safety Victoria (DFSV) is responsible for regulating the Victorian dairy industry to safeguard public health.



Key functions

- Licenses all dairy businesses operating in Victoria, from the farm through to manufacturing and delivery of final product to the retail store.
- Approves and monitors compliance with food safety programs and other regulatory requirements.
- Provides technical advice and support to licensees to help them to meet their dairy food regulatory requirements and to produce safe dairy food.
- Advises the Minister for Agriculture on matters relating to the administration of the Dairy Act.



Compliance Monitoring

- Food safety programs are regularly audited (min. two audits per year) to determine:
 - Adequacy of the program
 - Compliance to the program
- **Product Surveillance Program**
 - Microbiological testing for dairy products for their compliance with the food standards code.



Obligations of manufacturers

- Food Act 1984
 - S 10 Knowingly falsely describing food.
 - S 10A Falsely describing food in other circumstances.
 - S 12 Handling and sale of unsuitable food.
 - S 13 Misleading conduct relating to sale of food.
 - S 14 Sale of food not complying with the purchasers demand.
 - S 16 Compliance with Food Standards Code
- Dairy Act 2000
- Australia New Zealand Food Standards Code (Standard 1.2.3—4).
- Export Control (Milk and Milk Products) Orders 2005 – Schedule 7 Trade Description.
- Manufacturers are obliged to label products appropriately if allergens are, or may, be present.

Allergen management program (AMP)



- How manufacturers manage allergens on their site to ensure they are absent in food products which are not labelled to indicate they contain that allergen.
- Protect allergic consumers



Allergen management program (AMP)



- Must be part of food safety program
- Will be unique to each site
- Dependent on products, processes and ingredients
- Needs to be continually reviewed and updated





Elements of an AMP

- Allergen risk assessment (eg VITAL)
- Vendor assurance / raw material management
- Validation and verification of cleaning
- Staff training
- Labelling
- Segregation/Production scheduling
- Verification (end product testing)



What an FSM is looking for

- Documented evidence that all elements of the AMP have been undertaken satisfactorily
- Risk assessment
 - Identification of all allergens on site
 - Has this been done effectively
 - Has this been documented
 - Allergen matrix (is this up to date)



What an FSM is looking for

- Vendor assurance:
 - Does supplier have good AMP
 - PIF
 - Procedures for alternative suppliers
- Validation and verification of cleaning
 - Is this documented, effective and verified
 - What was the method used for validation?



What an FSM is looking for

- **Staff training**
 - Staff training records
 - What allergen training is delivered
 - Staff culture
- **Labelling**
 - Does the label reflect the risk of an allergen being present



What an FSM is looking for

- Segregation / Production scheduling
 - How is production scheduled to control allergen contamination
- Verification (end product testing)





Case Study # 1

- All product labelled as “may contain”
- Push by retailer to use VITAL assessment
- VITAL training undertaken by QA manager
- VITAL assessment on all products (line by line)
- Validation of cleaning by swabbing
- Allergen matrix developed and used for scheduling and production

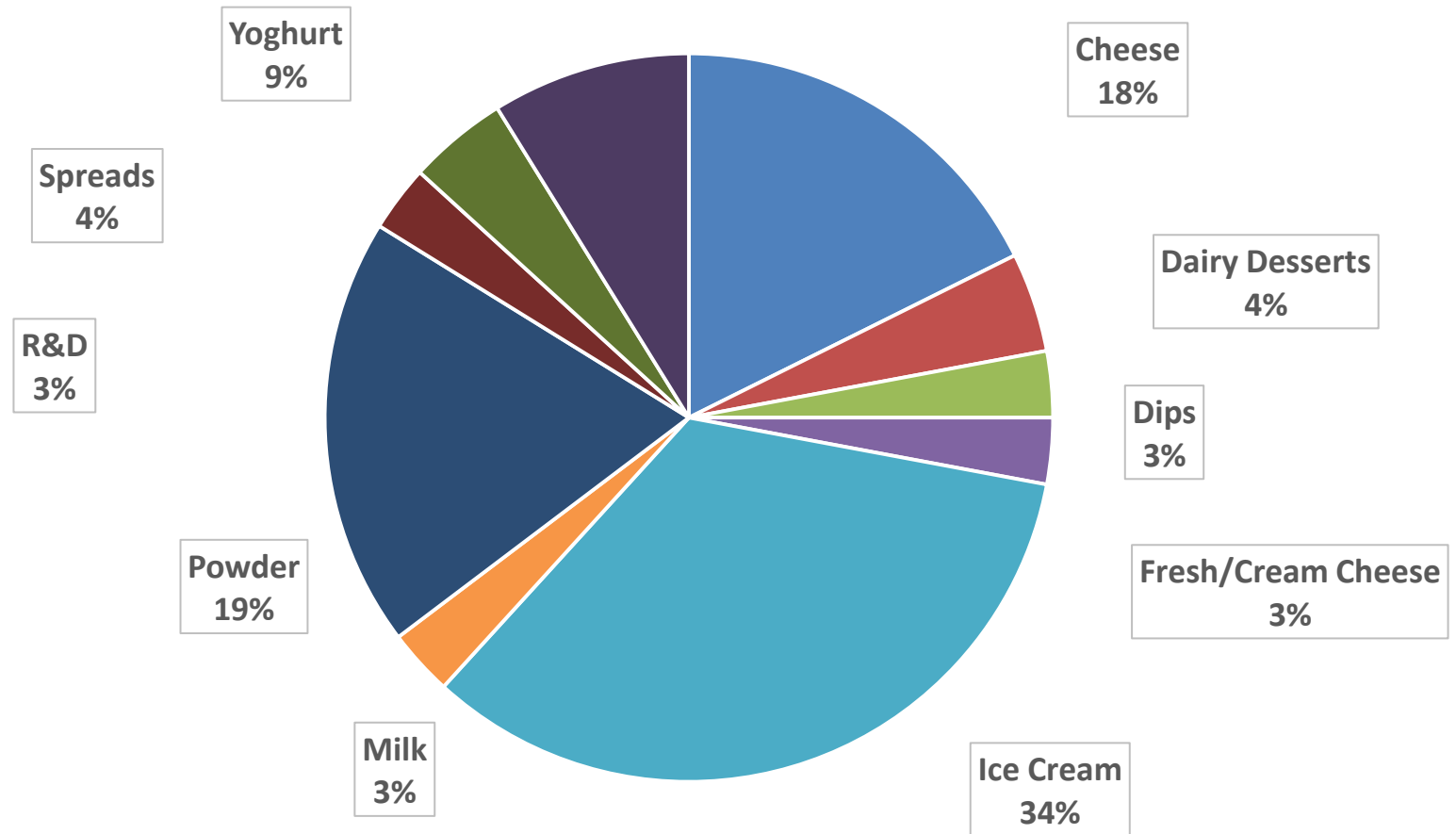


Case Study # 1

- Audit all high risk suppliers,
- Cleaning validated by swabbing after 1, 2 and 3 washes
 - Determined 2 washes required to remove allergens
 - Filler lines completely dismantled for swabbing
- All staff are trained on allergens, refreshed annually
- Ingredients- specific allergen room, pallet space for large quantities, segregated room in cooler
- Equipment colour coded
- Verification by product testing and swabbing annually

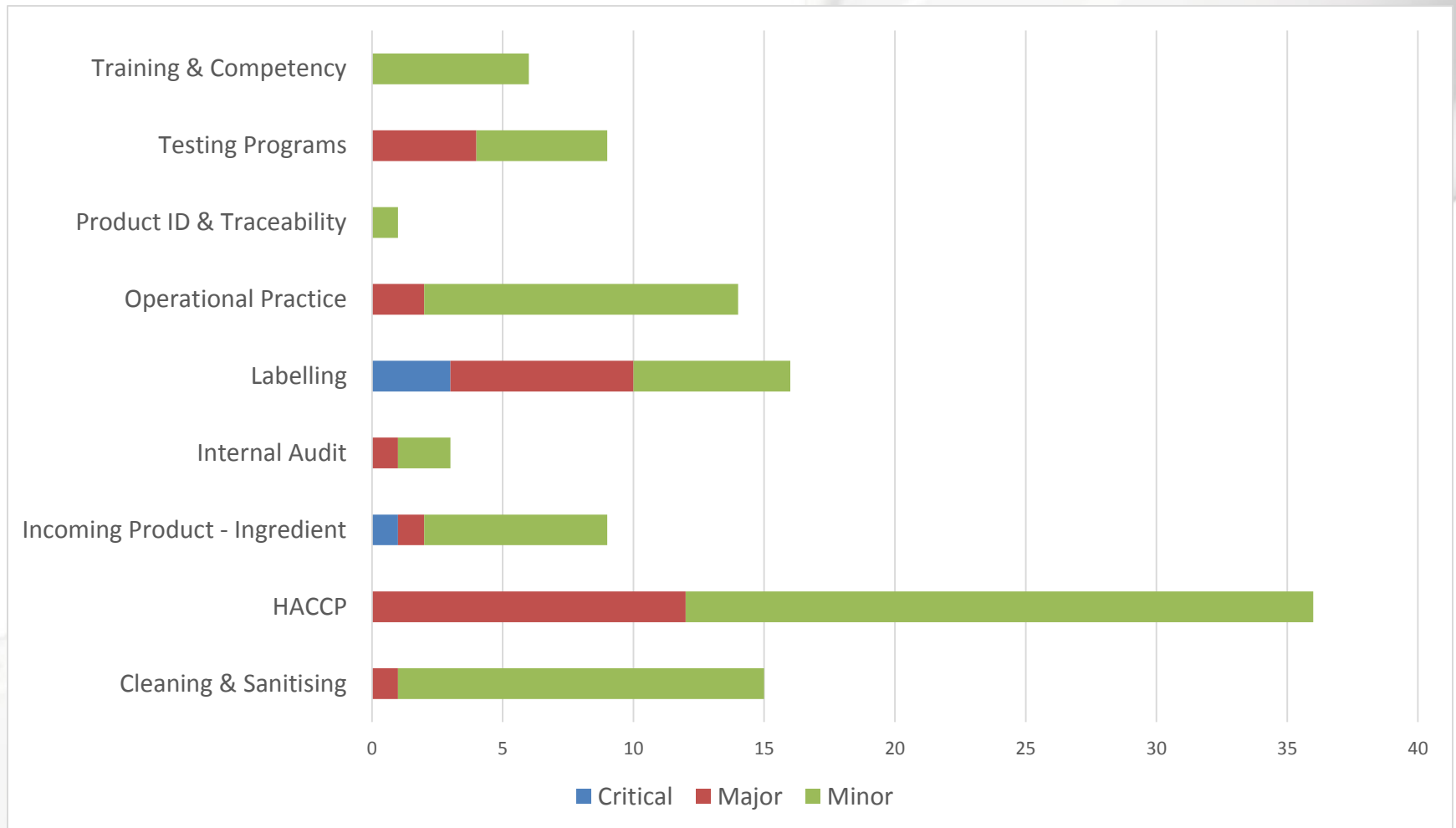


CARs by Industry Sector



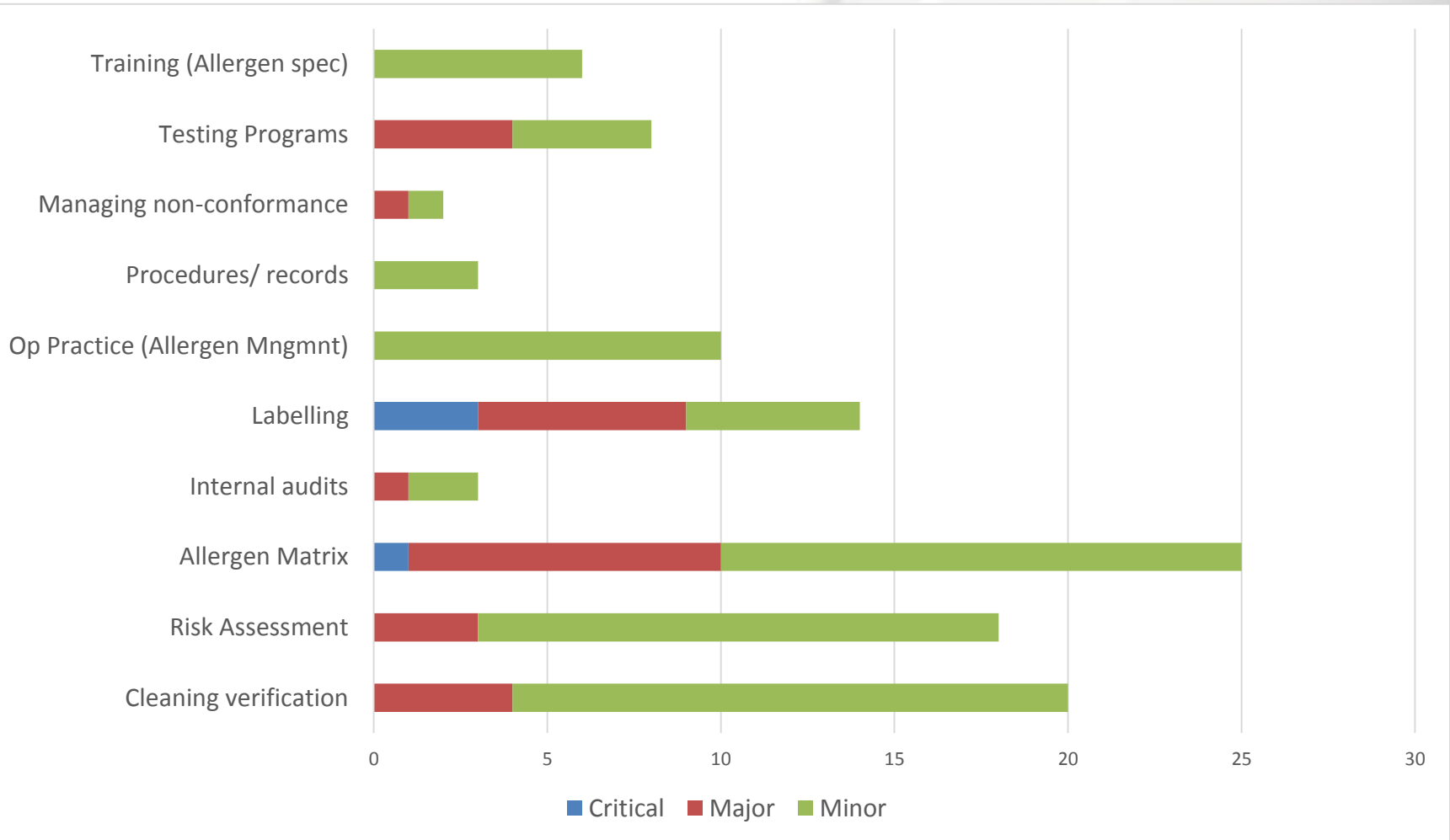


CAR Classification

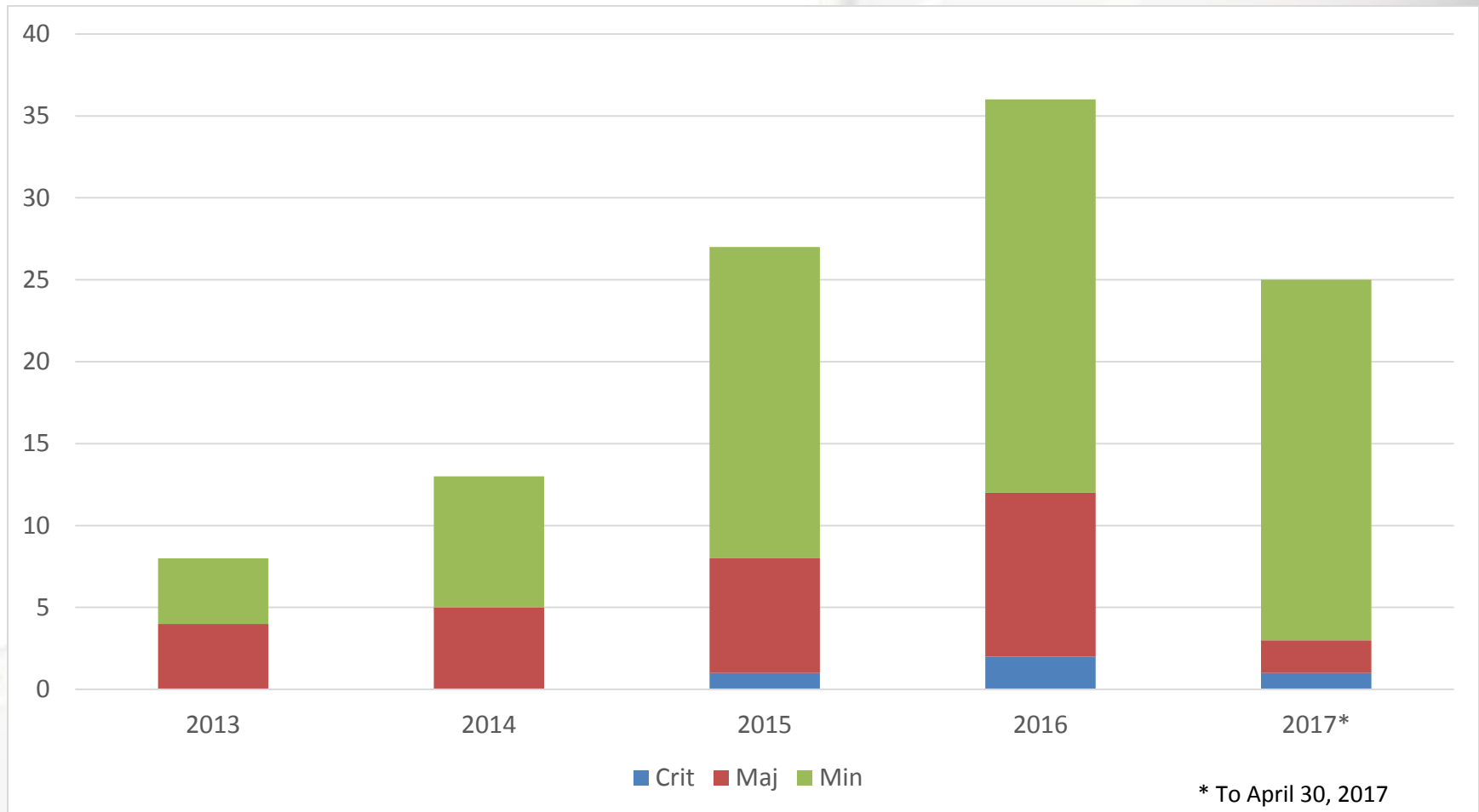




Root Cause

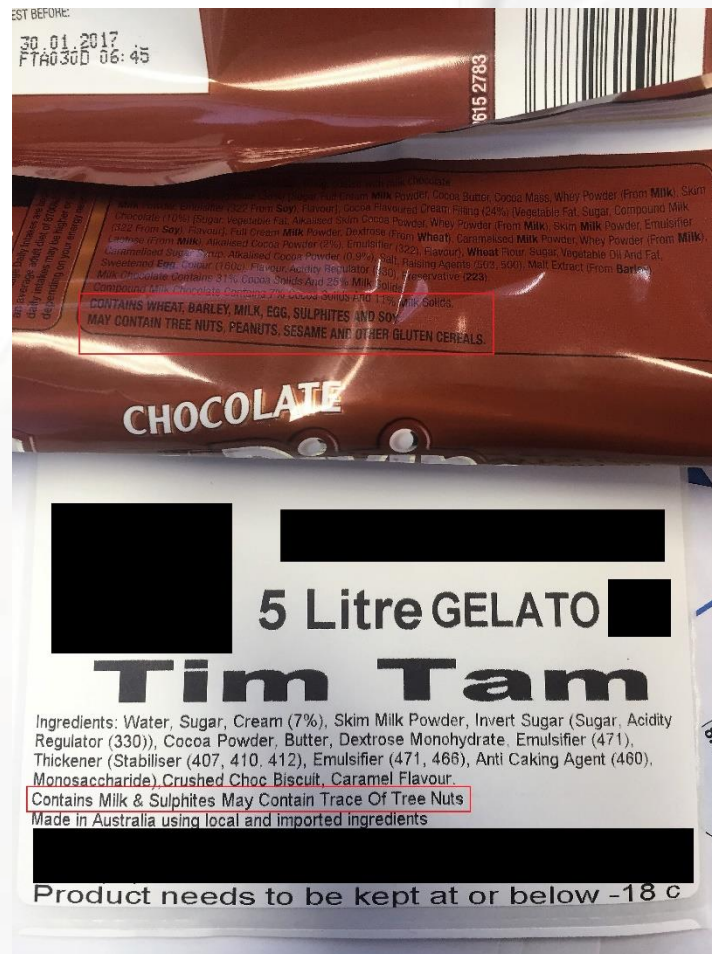


Trend of Allergen CARs at audit





Case study # 2



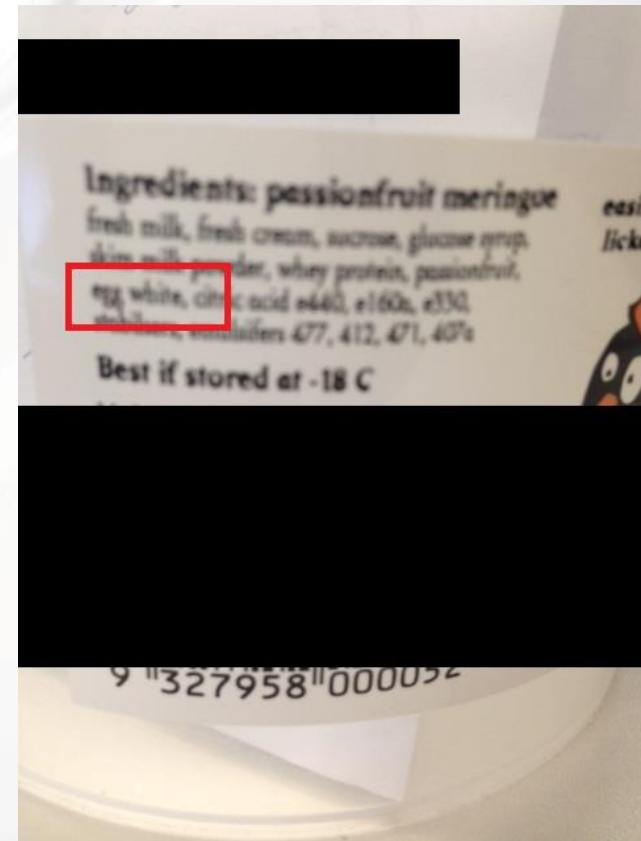


Case study # 2

- Response
 - Trade level withdrawal immediately undertaken.
 - Manufacturer issued with a critical non-conformance.
 - Issuing of a critical non-conformance has resulted in multiple onsite CAR close out audits and unannounced audits.



Case study # 3

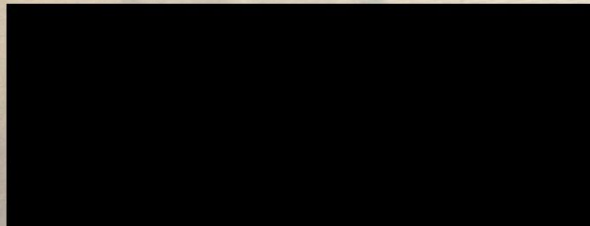


Voluntary Food Recall conducted of 690 units

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Case Study # 4



Suitable for vegetarians

Ingredients: Full Cream Milk, Emulsifier (322 From Soy).

Store in a cool, dry place. After reconstitution, store refrigerated below 4°C and consume within 3 days.

Product of Australia.



Case Study # 4

- Response
 - Trade level withdrawal conducted immediately.
 - VITAL Assessment conducted
 - All categories of finished product tested for presence of soy.
 - Manufacturer now sources milk powder free from soy



Case Study # 5



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Case Study # 5

- Response
 - Consumer level recall immediately conducted
 - Immediate review of all incoming product specifications.



Future considerations

- Ongoing focus of allergen management at DFSA audits.
- Targeted seminars and communication with highest risk industry segments (eg Ice Cream, Dip manufacturers)
- Development of a DFSA Allergen Protocol Document – similar to DFSA's Dairy Pathogen Manual.



Questions???

THANK YOU



"The good news is you're going to live; the bad news is you're allergic to cheese."