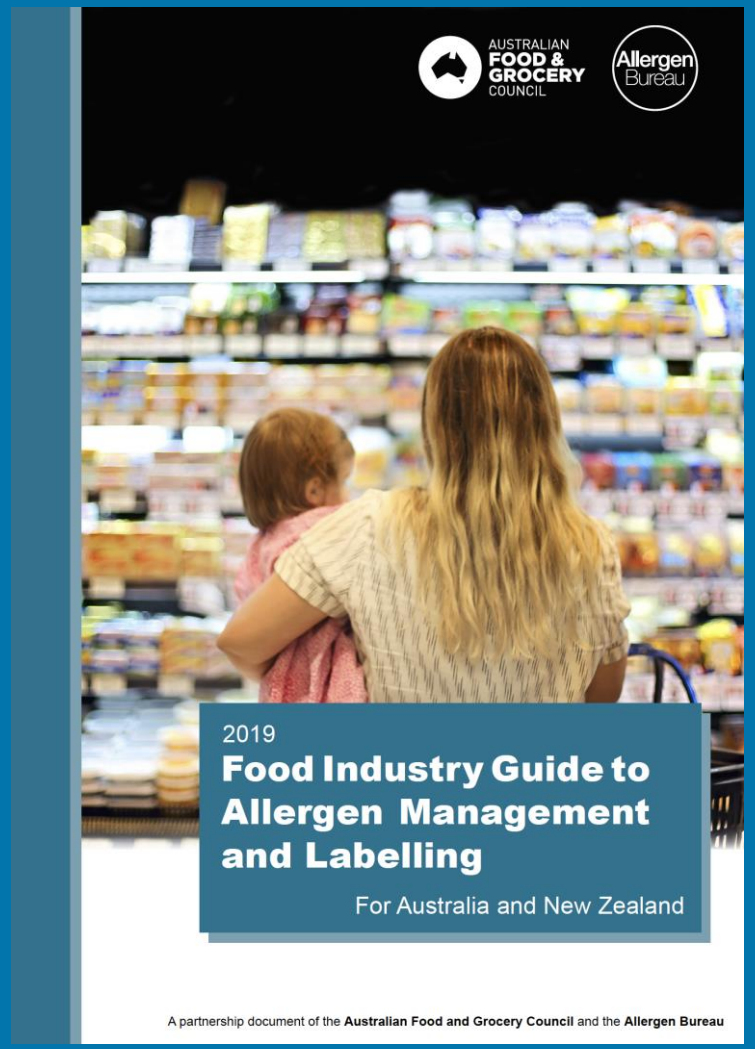
Food Industry Guide to Allergen Management and Labelling

Kim Tonnet, AFGC

VITAL 3.0 and Allergen Management Guidance
Breakfast Seminars, 2019



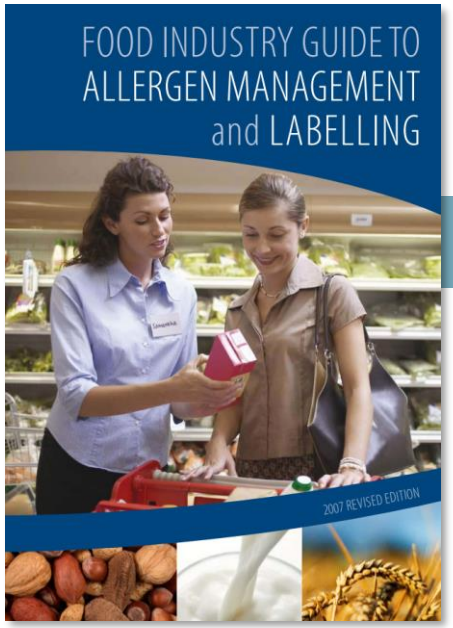
AUSTRALIAN FOOD & GROCERY COUNCIL

AFGC – Who we are:

Leading national organisation representing Australia's food, drink and grocery manufacturing industry.

200+ companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery product sectors.

The Journey to 2019



2007

The ANZ Food Standards Code was introduced in 2002 requiring declaration of allergens.

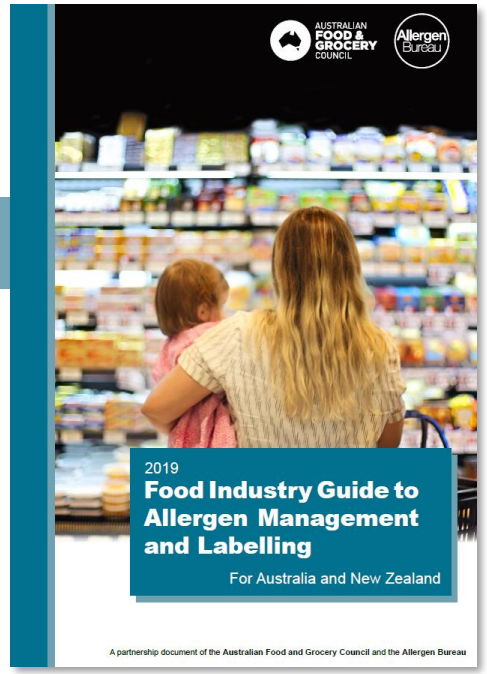
AFGC guidance was developed and is still used today.

2019

But the environment has changed:

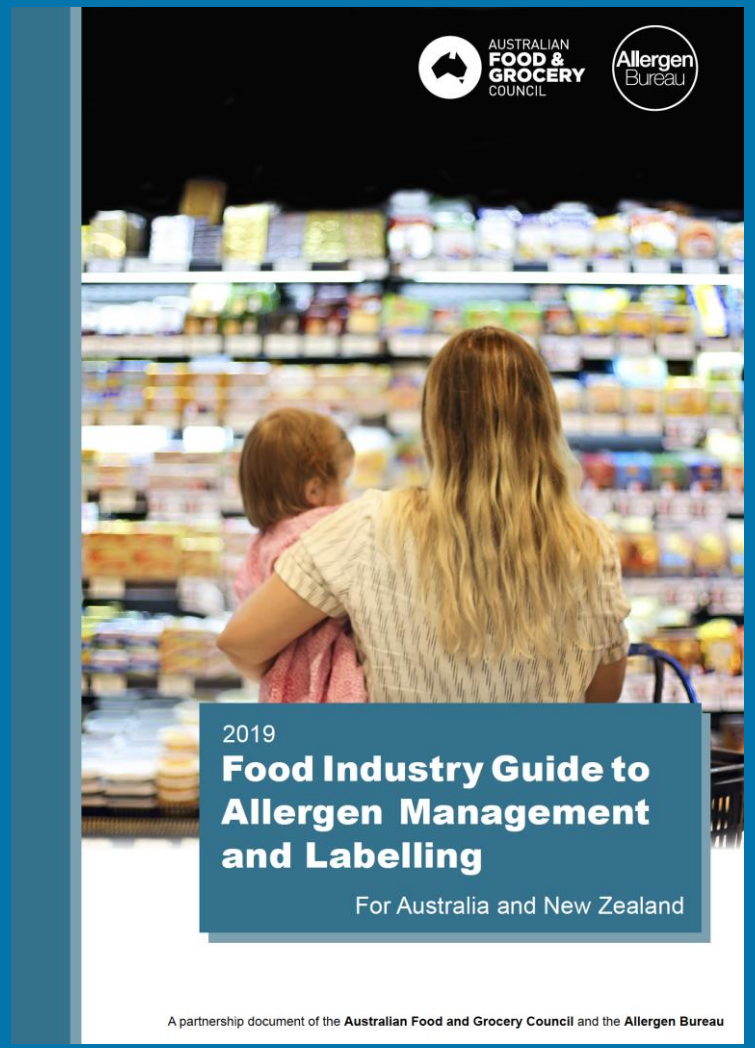
Increased incidence of allergic disease

Different regulatory requirements e.g. Exemptions 2016, Lupin 2017



What's new?

- Communicating allergen status change
- Differentiation of similar products
- Food recall case studies
- Label artwork approval
- NZ content
- Customer contact guidance
- Electronic publish only
- Referral to Allergen Risk Review website



Packaging Differentiation

When designing packaging artwork, consideration should be given towards providing a visual cue that distinguishes between products of different allergen status. An example is a range of pasta sauces that share the same branding. This range consists of both cream and tomato-based variants which have different allergens. Labels bearing clear visual differences can help shoppers recognise the variants more easily, reducing the chance of an incorrect purchase.

A company should review each product range and identify the potential for consumer confusion. Consider whether there are similar products with different allergen status within a product range, their proximity in-store and/or online, and whether products can be readily substituted for each other.

If determined to be of moderate to high potential for consumer confusion, then the company should differentiate the products using measures such as:

- colour of packaging and label
- using other visual cues such as ingredient pictures
- creating differences in visual appearance of the product (within the package)
- consistent location of variant descriptor across the range.

Alternatively, consider only using formulations that harmonise the allergens across similar products.

A food packed in different formats should have the same allergen status and declaration

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Communicating Change in Allergen Status (4.4)

- Allergen status change is to be avoided but it happens!
- Suggested consumer alert approaches:
  - changing a product's name or descriptor
  - changing colours or other visuals on the label
  - including a temporary flash or icon alerting the allergen change.

Additionally other forms of communication (online shopping, in-store demos & social media) are considered.

- Watch out for allergen removal and mix of products on-shelf during transition.

The food industry should not assume that foods that do not contain added cereals containing gluten are gluten free. The presence of cereal traces, cereal cross contact, highly refined cereals or products derived from e may not constitute gluten free. An example is the e of cereals into other grains or legumes as a icultural co-mingling.

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variations in ingredient supply, uction process, line or facility, can s to the allergen status of a food. curs, updating the allergen declaration on required. However, without careful reading of the label it may not be obvious to a consumer that the allergen status of the food has changed. Additionally, a consumer may not realise that the original product and the reformulated one may be in a store, or in their pantry, at the same time.

Clearly communicating any changes to the allergen status of a product on the front of the pack can assist with alerting consumers. Possible approaches to altering the label or package so that it is visually different include:

- changing a product's name or descriptor
- changing colours or other visuals on the label
- including a temporary flash or icon alerting the allergen change.

Figure 3: Examples of graphics that indicate a change to allergen status

In addition to front of pack communications, consideration should be given to alerting consumers with food allergy through patient support organisations such as Allergy & Anaphylaxis Australia (A&AA) or Allergy New Zealand, and Coeliac Australia/New Zealand. These organisations can notify their members of the nature and timing of the change to support the company. Information can also be communicated via a company website or social media.

When determining the duration of an alert, consider shelf life and stock in trade practices (e.g. first-in, first-out).

Differentiating Similar Products (4.4)

- Best practice is to have same allergen status for similar products e.g. different pack sizes or format.
- However, not always possible so if there is risk of confusion/mistake when purchasing, make every effort to distinguish products:
  - colour of packaging and label
  - using other visual cues such as ingredient pictures
  - creating differences in visual appearance of the product (within the package)
  - consistent location of variant descriptor across the range.

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2.3 INTERNATIONAL FOOD ALLERGEN REGULATION

The labelling guidance provided in this document is focused on Australia and New Zealand allergen declaration requirements as set out in the Code. It is important for businesses to be aware that allergen labelling differs across countries and regions. This is a result of different prevalence, sensitivities and exposure to allergenic foods and ingredients in those areas. In addition to the allergens required to be labelled in Australia and New Zealand, there are other allergens of concern that should be considered for products which are exported from or imported into Australia and/or New Zealand.

A summary of the international allergens of concern compiled by the Food Allergy Research and Resource Program (FARRP)[13] is available on their website. This is a useful tool for identifying differences amongst geographical locations. However, when importing foods and ingredients into Australia and New Zealand a more detailed regulatory understanding is then needed. An example is coconut (from the palm *Cocos nucifera*) which may be included as a tree nut in some jurisdictions including the USA and not in others.

Suppliers and producers importing foods or ingredients into Australia and New Zealand may not be aware of the specific allergen declaration requirements in this market. This can result in raw material specifications or product labels failing to declare the presence of certain allergens. For example, the US do not require the declaration of any highly refined oil derived from their prescribed list of allergens (which are milk, egg, fish, crustacean shellfish, tree nuts, wheat, peanuts, and soybeans[14]). Therefore, a company importing foods or ingredients from the US must carefully confirm the allergen status of the material as the US supplier may not have considered that many highly refined oils must be declared in Australia and New Zealand.

The European Union has one of the most comprehensive lists of allergens that require mandatory declaration, which includes 14 foods (including m and celery) that cause allergies or intoleran Annex II of Regulation No1169/2011. as allergens in the regulations of markets are also present in th

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Food Recall (5)

High proportion of food recalls in ANZ due to errors in allergen declaration.

Updated guide covers:

- Food Recall Plans
- Mock Recalls
- Recall Communication
- Cost Impact of a Food Recall
- Available resources

Have a Food Recall Plan in Place

All food companies should have a documented Food Recall Plan which can be implemented if a food fety issue is identified. The food recall plan should an allergen related communications plan with ed, responsible person identified to provide customers, consumers, and regulatory mely manner. The plan should include en related stakeholder contact list.

ring a Food Recall plan for vailable on the FSANZ d on the MPI website.

Industry Recall Protocol rovides information on he crisis management es an ANZ Product n industry-agreed withdrawal of New Zealand

Mock Recall

Conducting a mock recall assists with identifying gaps demonstrating the ability to withdraw and recall affected product, contacting relevant customers, and maintaining records of these incidents. The traceability system should be tested at least annually with results documented and corrective actions implemented. Traceability should be achievable within two to four hours.

Recall Communication

In the event of a product recall due to the presence of an undeclared allergen, it is important that companies communicate information in a timely manner. In addition to communication via the required recall notification protocols, other channels such as the company website and social media should also be considered. Online solutions are also available to both Australia and New Zealand that assist with communicating food recalls and withdrawals to trading partners and regulators.

All food companies should have a documented Food Recall Plan which can be implemented if a food safety issue is identified.

Allergen Risk Review

Documented systematic approaches

Identify allergen risks, allergen challenges in manufacturing

Allergen Management

Cover all aspects of the supply chain

Similar but not the same

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Allergen Risk Review

the process of thoroughly investigating the allergen status of a food.

Allergen Management

the procedures, policies and practices contributing to the control of allergens within a food business.

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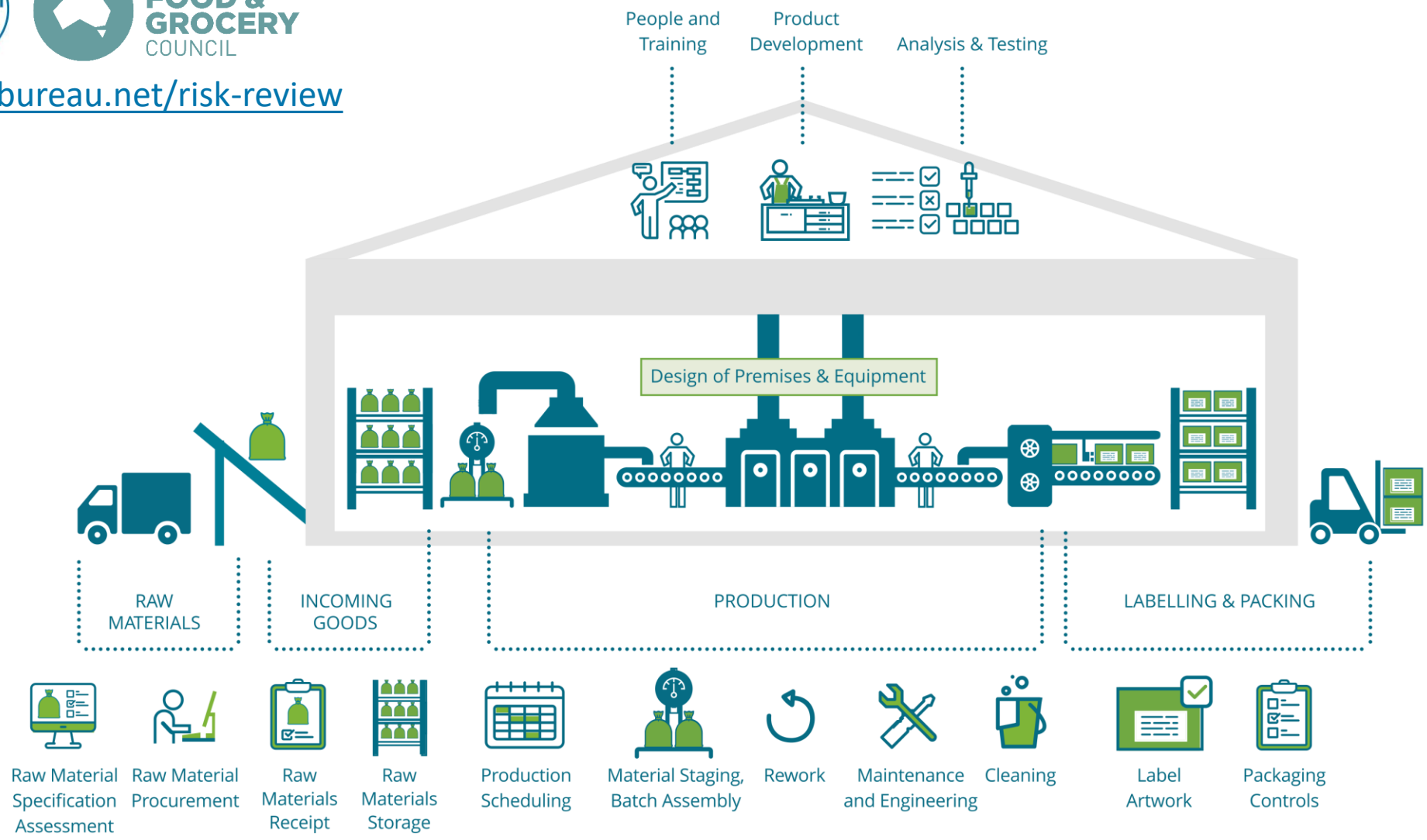
allergenbureau.net/risk-review



Getting started

Have an allergen management program in place.

An **Allergen Management Program (AMP)** is a documented systematic approach towards identifying and controlling allergens in a food facility. It is applicable to all levels and all areas of a food company and sets the approach to the control and management of allergens.

An **allergen risk review** can assist in identifying areas that need to be included while developing an AMP or when updating one that is already in place. An allergen risk review requires the support of many parts of the business including management. It should be repeated regularly (such as when HACCP reviews are conducted) as well as after any changes to staff, suppliers, equipment, materials, scheduling, recipes, sites etc and the AMP should be updated accordingly.

back

next

Entire Project Step 13 of 15

People & Training

Trained staff who are aware of food allergen risks can support a business in successfully controlling and managing food allergens. Staff from all parts of the business (including contractors and temporary staff) should understand their role in allergen management. Encourage staff to look for allergen risks and have processes in place so that the risks are addressed.

Training

Key training considerations

Management and staff

Allergen Management Program (AMP)

Management commitment and review – A documented AMP should be in place which is authorised by senior management and communicated to all staff. Authorised personnel are responsible for development and implementation of AMP which should be reviewed at least annually or when changes are made.
People Management – Documented procedures for the management and control of personnel that includes personal protective equipment (PPE), personal hygiene, meals, movement, facilities, staff changes and visitors should be in place.
Training – The AMP will include processes where new staff are provided with induction training and current staff undertake annual refresher training in allergen management.

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Production Step 9 of 15

Cleaning

Cleaning equipment, preparation areas and the production lines of a food manufacturing site is necessary to eliminate allergen residue and the potential for cross contact. As facilities can vary in complexity, food materials, the allergen type, number, and nature, equipment type, and food contact surfaces, cleaning parameters may be unique to each process or site.

Hang Up

Cleaning controls and trouble spots

Cleaning validation and verification

Risk review considerations

Allergen Management Program (AMP)

An effective AMP will include procedures in place for:-

Cleaning – Procedures to manage raw material spills, and for cleaning the facility, equipment, and tools to prevent allergen cross contact are in place. Cleaning validation and verification is monitored and reviewed.

Waste – Procedures in place to control waste product and packaging that contain allergens. For example, a package that stored a milk based ingredient, should not be reused for a different ingredient that does not contain milk.

Incoming Goods Step 4 of 15

Raw materials storage

Raw materials and **ingredients should be stored** such that allergen cross contact is prevented. Processes to manage spillages of ingredients in storage and returns to warehouse should be in place.

Storage location and ingredient segregation

Consider the nature of the allergen

Spillages and returns to warehouse

Changes to the allergen status of a material

If the allergen status of a raw material or ingredient changes, consider the following:

- Requirement for prior communication and allowance for appropriate time for setting up warehouse and incoming/outgoing goods.
- The implications for transit, goods receipt, internal transport.
- Volumes required to ensure appropriate space within storage and staging areas.
- Labelling and signage.

Allergen Management Program (AMP)


P1044 PEAL

Where to get the Guide

AUSTRALIAN FOOD & GROCERY COUNCIL

Kim Tonnet
kim.tonnet@afgc.org.au

Website afgc.org.au/industry-resources/food-labelling-and-allergen-guide

Allergen Bureau

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Website allergenbureau.net/resources