

# Allergen Management

## A regulatory perspective

FAMS 2019

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# Overview

- Who is Dairy Food Safety Victoria?
- Dairy manufacturers
- Regulatory requirements
- Allergen management in dairy production
- DFSV support
- Regulatory oversight/verification
- Case study



# Dairy Food Safety Victoria

- Objective – ensure standards which safeguard public health are maintained in the Victorian dairy industry





# DFSV – key functions

- Licence all Victorian dairy manufacturing businesses (approx 220)
- Conduct twice-yearly audits to monitor compliance with approved food safety programs (FSPs) and other regulatory requirements (managing the risks)
- Provide technical advice and support to licensees to help them to meet their regulatory obligations and produce safe food (navigate the science)





# DFSV licensees

- Definition of dairy manufacturers
  - Make and sell products made from cow, goat, sheep or buffalo milks
  - Precludes low risk products made from pasteurised product for immediate consumption from retail premises
  - We do not usually licence non-dairy manufacturers (e.g. soy milk, almond milk)





# Regulations

- Australia New Zealand Food Standards Code
  - Mandatory label declarations (Standard 1.2.3—4)
  - Statement of ingredients (Standard 1.2.4)
  - “Safe and suitable” definitions (Standard 3.1.1—2)
- Dairy Act 2000 (Victoria)
  - Licensing of manufacturers (including FSP)
- Food Act 1984 (Victoria)
- Export Control (Milk and Milk Products) Orders 2005
  - Specific importing country requirements



# Allergen management program (AMP)



- Part of each manufacturer's food safety program
- Will be unique to each site
- Content/complexity is dependent on products, processes and ingredients
- Reviewed and updated periodically





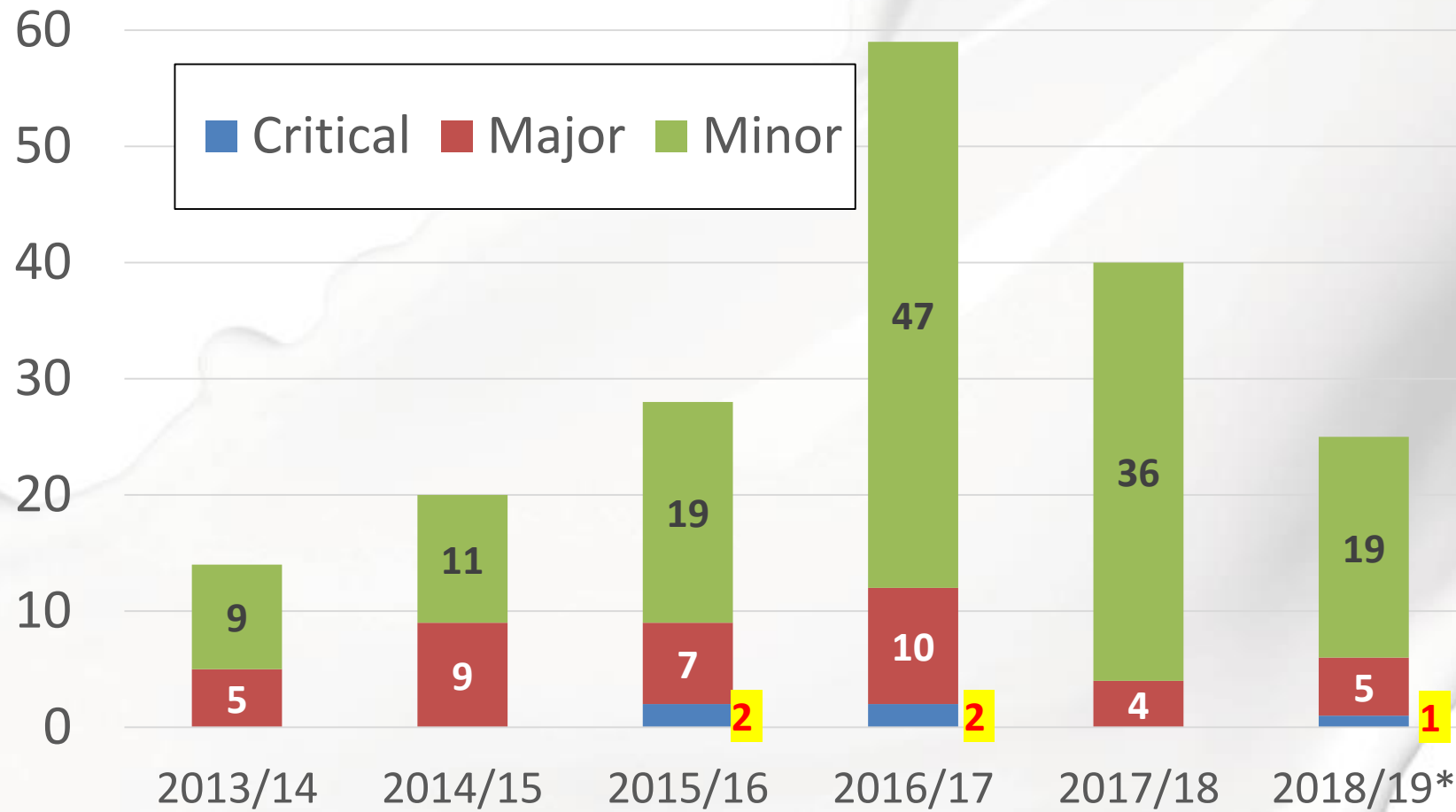
# Elements of an AMP

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





# Number of allergen CARs



\* Results to Mar 2019



# DFSV initiatives

- Ongoing focus on allergen management at DFSV audits
- Targeted seminar for highest risk industry segments (ice cream & dips)
- Industry webinar through Dairy Australia (2017)
- Publication: *A guide to managing allergens in the dairy industry* (2018)

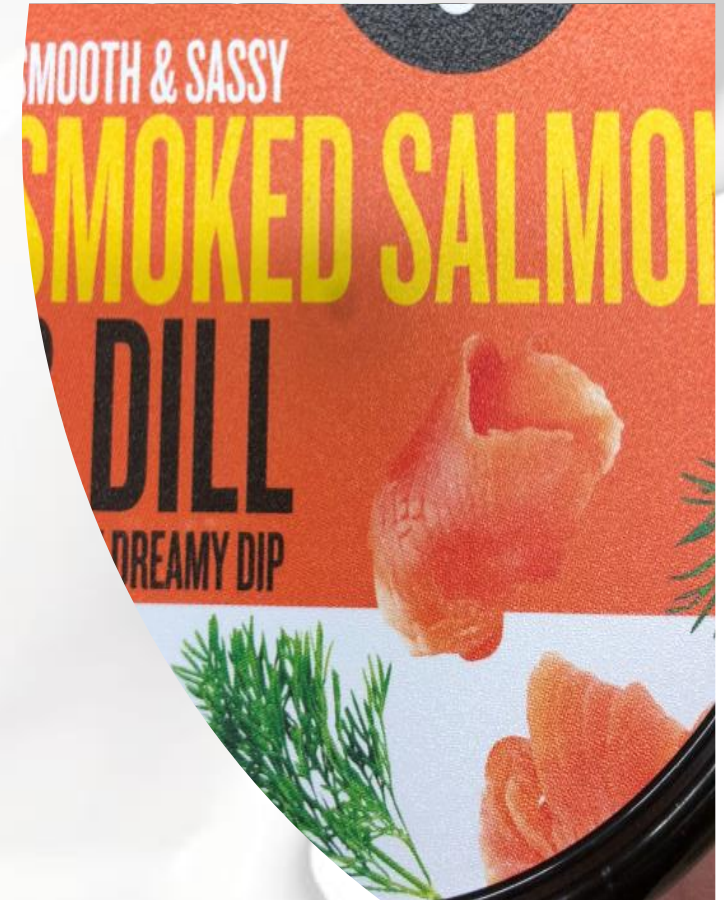
[www.dairysafe.vic.gov.au](http://www.dairysafe.vic.gov.au)





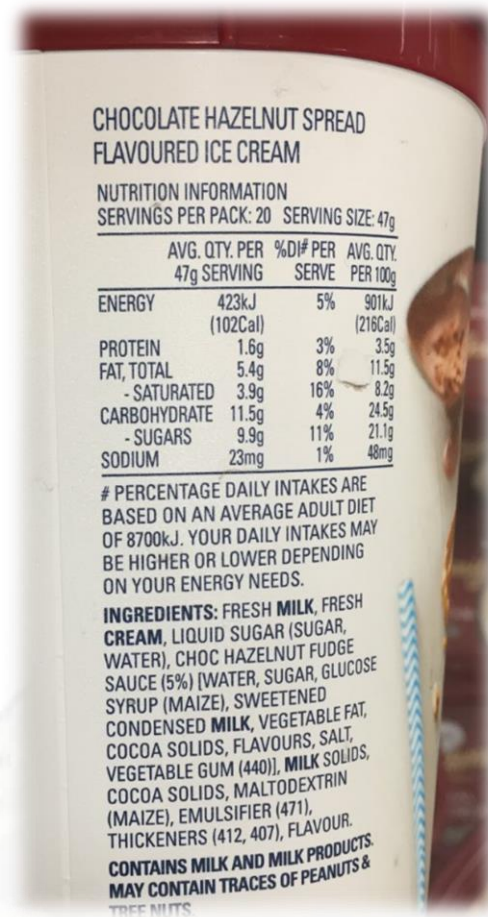
# DFSV initiatives - verification

- Surveys of the presence of undeclared allergens in targeted dairy products
- Initiated 2018
- High risk products selected
  - four dip manufacturers
  - four ice cream manufacturers





# Allergen survey - summary

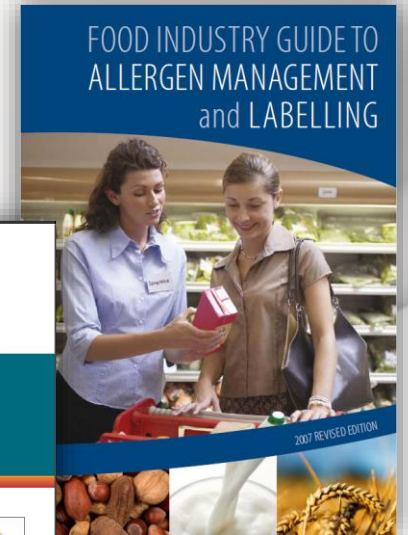
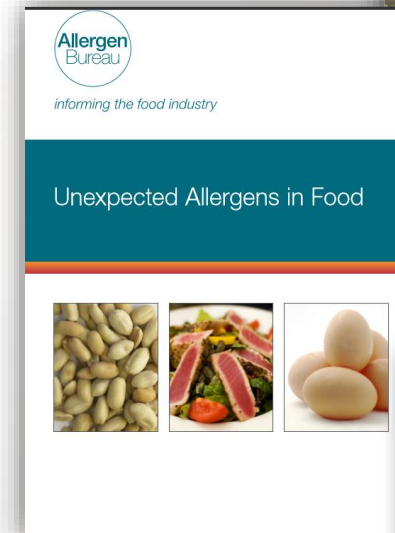


- No undeclared allergens or label inconsistencies were identified in the total 57 samples tested
- A sound proof-of-concept for this type of monitoring program
- Survey expanded in 2019
- Learning - Testing methodology and interference by food matrix (false positive)



# Resources

- Allergen Bureau
  - VITAL guidance material, resources & training
  - *Unexpected allergens in foods* (2011)
  - Website (risk review tool)
- Australian Food and Grocery Council
  - *Food industry guide to allergen management and labelling*
- FSANZ
  - Food allergen portal (updated 2018)
- Codex Alimentarius
  - *Code of Practice on Food Allergen Management for Food Business Operators (draft)*
- DFSV
  - *A guide to managing allergens in the dairy industry* (2018)





# Allergens – a DFSV case study

- Nut allergic consumer reacted to coconut-based frozen dessert containing fruit and chocolate
- DFSV licensee confirmed as the manufacturer of the dessert
- DFSV licensee contracted packed for another business
  - all ingredients and packaging provided by the client
  - No allergen warning statement for nuts on label *e.g. no 'may contain'*





# Allergen incident – a case study

- Investigation complicated
  - DFSV liaison with manufacturer
  - DHHS liaison with retailer/brand owner
- Implicated product confirmed positive for *pistachios/cashews*
- Manufacturer re-confirmed validation of their equipment cleaning regime
- Retained samples tested – same nuts detected as present
- Individual ingredients tested – chocolate found positive for nuts
- Product specification for chocolate stated “**contains** traces of nuts”

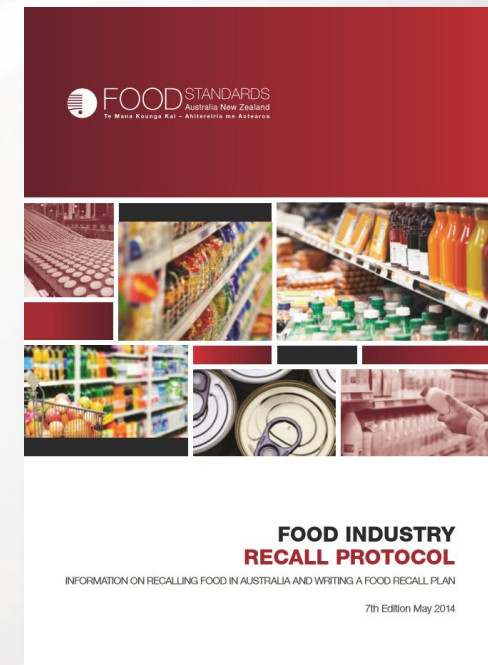






# Allergen incident – a case study

- Outcome: consumer level product recall for product containing this chocolate (done through retailer)





# Allergens: contract manufacturing

- ✓ Access to the client's ingredient product specification (e.g. PIF)?
- ✓ Level of confidence in the information provided?
- ✓ Able to assess all raw materials for potential allergens?
- ✓ Verify what goes on the label?
- ✓ Consider how contract client ingredients could potentially affect your other products &/or production environment?



# Summary – key points

- Continued DFSV focus on allergen management by manufacturers through FSP approval and audits
- Ongoing targeted allergen testing program to verify compliance with standards
- Enhance manufacturer (licensee) awareness and knowledge on allergens