



informing the food industry

Key Successes of the Allergen Bureau

NZIFST Conference (3 Jul 2018)

Debbie Hawkes

Director, Allergen Bureau

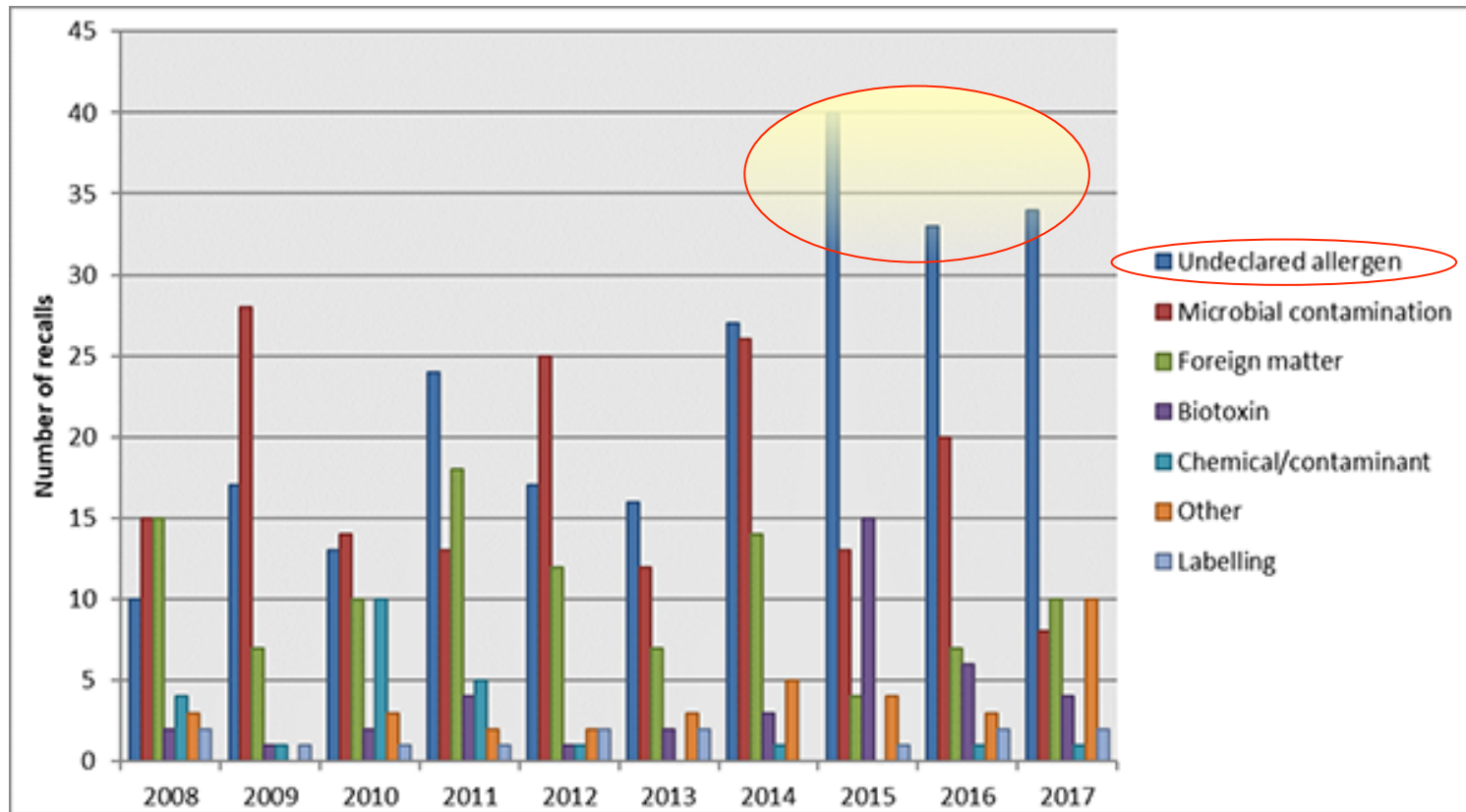
(General Manager – Operations & Quality ANZ, Hawkins Watts)

Overview

- FSANZ Allergen related Recall stats...
- Who is the Allergen Bureau? Mission & Vision
- VITAL[®] Framework
- VSEP – VITAL Scientific Expert Panel
- Current Working Groups
- Award for Best Practice in Food Allergen Management
- Benefits and challenges of the VITAL Program

FSANZ Allergen related Recall Stats

Undeclared Allergens are still the major cause of FSANZ recalls



Source: <http://www.foodstandards.govt.nz/industry/foodrecalls/recallstats/Pages/default.aspx>



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Who is the Allergen Bureau?

- The Allergen Bureau is the **peak industry body** representing food industry allergen management in Australia and New Zealand
- The Allergen Bureau is a **membership based** organisation established to provide food industry with rapid responses to questions about allergen risk management in food ingredients and manufactured foods
- Established 2005, **pre-competitive**, 'not-for-profit', industry volunteer Board

Full Members





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The Allergen Bureau – Our Vision and Mission

Vision

- The Allergen Bureau is a globally recognised and supported industry organisation promoting best practice food industry allergen management, risk review and consistent labelling to facilitate informed consumer choice

Mission

- To facilitate a globally accepted, consistent, science-based approach to food allergen risk assessment, management and communication that:
 - guides **industry** best practice
 - assists allergen sensitive **consumers** to make informed choices based on label information

Organisation

Our Members

<http://allergenbureau.net/about-us/our-members>

Board of Directors

Kirsten Grinter • Caroline Gray • Debbie Hawkes
David Henning • Karen Robinson

Secretariat

Dr Tom Lewis
Ray Murphy

Management Committee

Kirsten • Caroline • Debbie
Tom

Website & VITAL Online

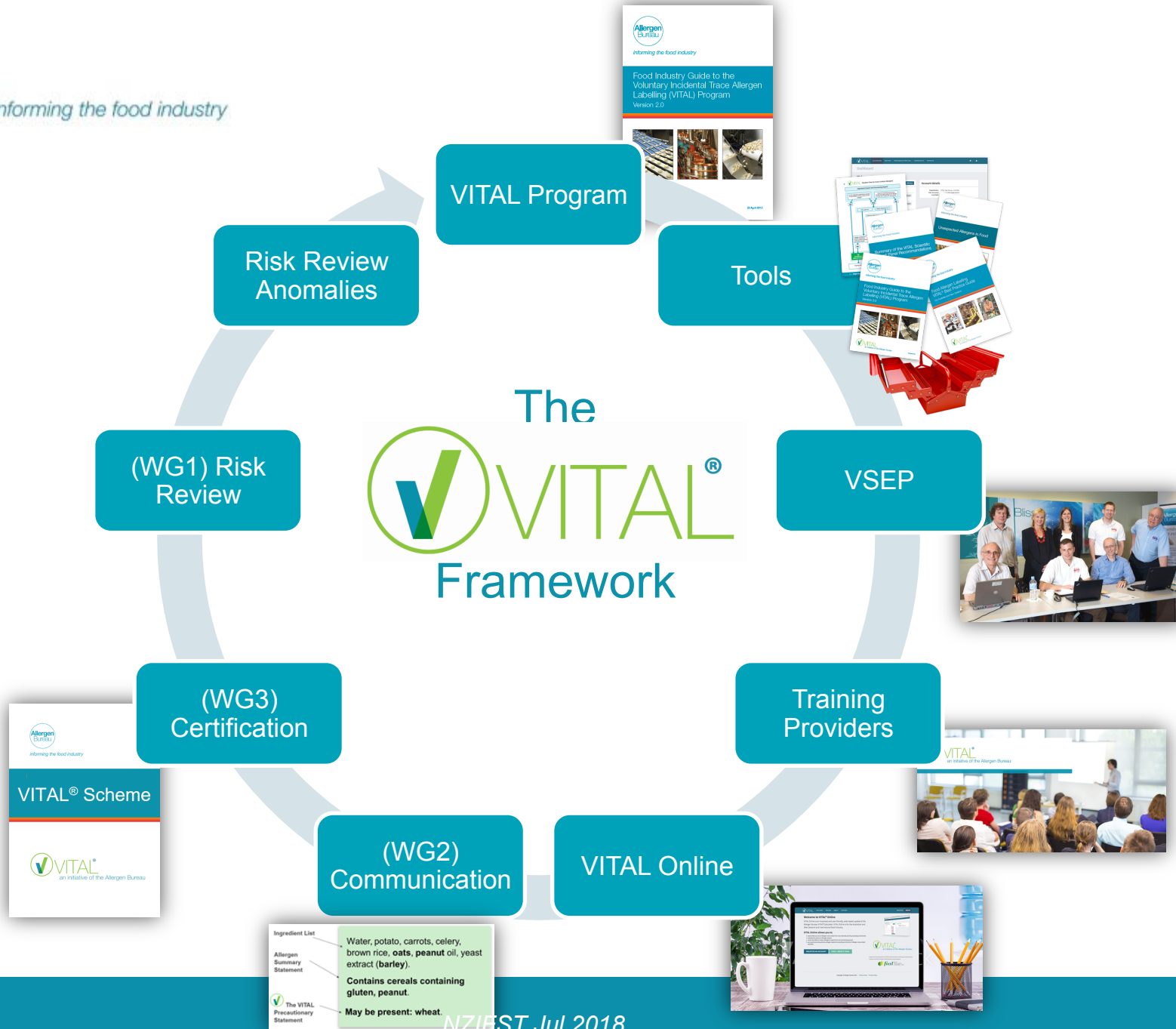
External service providers

Operations

Ray

Scientific & Technical

Georgina Christensen • Lisa Warren
Dr Simon Brooke-Taylor • Robin Sherlock



The VSEP

VITAL® Scientific Expert Panel



- **Dr Steve Taylor** (Chair of Panel) – Food Allergy Research & Resource Program (FARRP) (USA)
- **Dr Joseph Baumert**– Food Allergy Research & Resource Program (FARRP).
- **Dr Geert Houben** – Program Manager Food Safety, Netherlands Organisation for Applied Scientific Research (TNO) (NL). Supported by **Mr Benjamin Remington**
- **Dr Rene Crevel** - (RENE CREVEL Consulting Ltd) (UK) (formerly of Allergy & Immunology, Unilever)
- **Dr Katie Allen** – Paediatric Gastroenterologist / Allergist, Royal Children's Hospital, University of Melbourne). Supported by **Ms Jennifer Koplin** (AUS)
- **Dr Simon Brooke Taylor** - Food Safety & Risk Analysis Consultant, Allergen Bureau) (AUS)

The VSEP overarching scientific approach

- ~ analysed existing published clinical data and some unpublished data (>1800 data points)
- ~ statistical modelling to look at implication for the allergic population
- ~ scientifically and clinically sound, defensible and transparent
- ~ published papers (Taylor et al 2014, Allen et al 2014)
- ~ protection for vast majority of people with food allergy

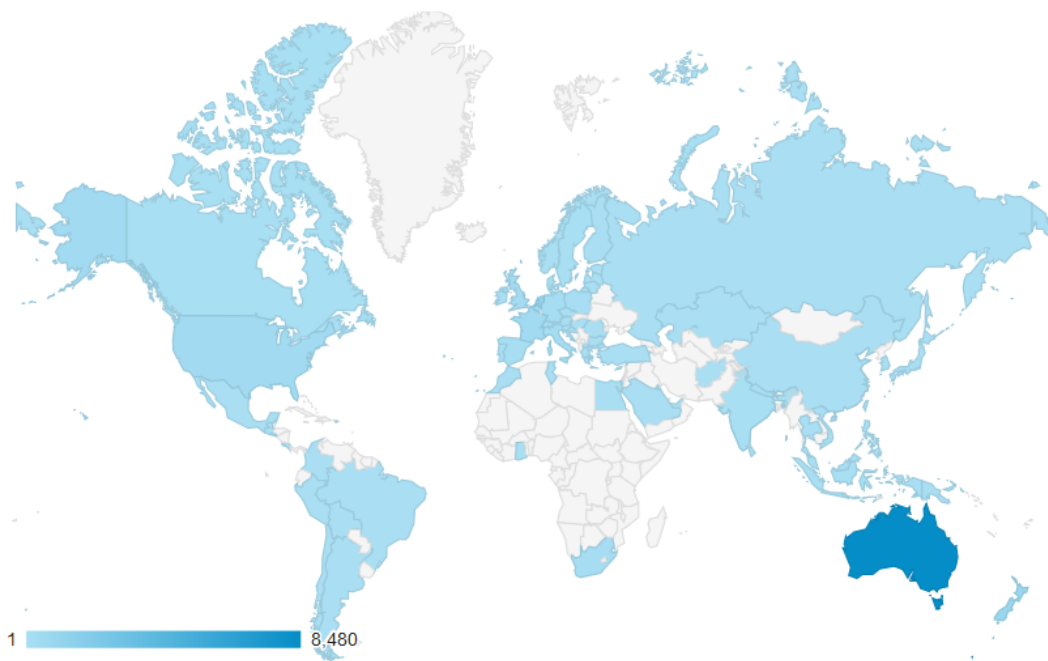


Next VSEP meeting planned for Oct 2018, at EAACI-FAAM, Copenhagen

Our current successes

- Allergen Bureau membership continues to grow, comprising over 100 food industry organisations and individuals
 - ✓ 33 Full Members, 33 Associate Members and 44 Individual Members
 - ✓ International memberships increasing
- Technical support helpline for Allergen Management and VITAL® enquiries
- Excellent free resources available via website, including eNews distribution
- VITAL Best Practise Labelling Guide for ANZ
- VITAL Online continuing to increase in usage:
 - ✓ 2,090 registered organisations, equating to over 3,400 individual users, with 'active users' of VITAL Online between 340 – 540 in any month
 - ✓ Since it's launch in August 2015, users have generated over 13,000 VITAL reports, with over 8,500 ingredients, and 7,000 recipes.

Growing International Interest



Interactive VITAL Online website sessions – since Jan 2017

Australia	8,480 (61%)
Netherlands	1,020 (7%)
New Zealand	876 (6%)
France	467 (3%)
Belgium	462 (3%)
United States	412 (3%)
UK	274 (2%)
Italy	258 (2%)
South Africa	229 (2%)
Germany	184 (1%)

The VITAL[®] Program tools

- ~ VITAL Procedure
- ~ Decision Tree
- ~ VITAL Online (Calculator)
Includes interactive VITAL Action Level Grid
- ~ VITAL training materials
- ~ Guidance documents & FAQs



Reference Doses

Allergen	Reference Dose (mg of total protein)
Peanut	0.2
Milk	0.1
Egg	0.03
Tree nuts	0.1
Soy	1
Wheat	1
Mustard	0.05
Lupin	4
Sesame	0.2
Crustacea (shrimp)	10
Fish *	0.1

* Original VITAL value applied

The total protein from an allergic food below which only the most sensitive individual (between 1 and 5% depending on the quality of the data) in the allergic population are likely to experience an adverse reaction

Considered in conjunction with a reference amount to provide a ppm outcome and labelling recommendation

Particulate : non homogeneous and could deliver the reference dose

The 10 Steps of VITAL[®]

1. Determination of relevant allergens
2. Identification of intentionally added allergens
3. Identification and quantification of cross contact allergens due to ingredients
4. Identification & quantification of cross contact allergens due to processing
5. Calculation of total cross contact allergen in finished product
6. Determination of Action Levels
7. Review of labelling recommendations and sources of cross contact
8. Recording of Assumptions
9. Validation of VITAL assessment
10. Ongoing Monitoring

Consider VITAL as a ***systematic Allergen Risk Assessment tool***.
It is not just about cross contact.

<http://allergenbureau.net/vital/vital-downloads>

VITAL[®] Online - Features

- ✓ Libraries with Ingredients and Processing Profiles
- ✓ Documented and traceable assumptions and findings
- ✓ Scenario Testing
- ✓ Secure User permissions



VITAL[®] Online (vital.allergenbureau.net)

+ ADD INGREDIENTS

Sugar RM3
30.0000000%

Cooking fat RM2
30.0000000%

Liquid whole eggs RM1
30.0000000%

Dark compound Chocolate RM44
10.0000000%

100.0000000% of ingredients entered

Sugar RM3
Ingredient as a percentage of recipe*
30.000000

Allergens & their products
Gluten containing cereals +
Tree nuts +
Celery
Crustacea
Eggs
Finfish

Step 1 ✓
Step 2 ✓
Step 3 ✓
Step 4 ✓
Step 5

NEXT STEP

Help and Support
Add the individual ingredients, their allergens and their percentage of this recipe. Choose from your pre-entered ingredient library, or enter them manually.

Reference Amount
Use this field for products sold to consumers.
The maximum amount of a food eaten in a typical eating occasion (never < serving size).

Create recipe

Recipe name*
Flourless Chocolate Cake

Recipe code* ⓘ
Cake1

Reference Amount* ⓘ
80 g
E.g. Finished Product Serving Size.

☐ **Ingredient intended for further processing**
Reference Amount not applicable

Reference Amount assumptions* ⓘ
Represents one slice of cake

Legislation*
Australia and New Zealand

Legislation description
ANZFSO Allergens

NEXT STEP

Use this field for preparing a PIF for a customer, or when combining recipe components

Example of a VITAL[®] Online Labelling Outcome Summary

VITAL labelling outcomes will appear like this

These Action Levels will change depending on the product's Reference Amount

Table : Summary of labelling outcomes
Reference amount or serving size: 80g

Substances	Reference dose (mg)	Action level 1	Action level 2	Cross contact amount		Labelling outcome
				Particulate	Readily dispersible (ppm)	
Celery						
Cereals containing gluten (Total)	1	< 12.5 ppm	≥ 12.5 ppm			
Barley	1	< 12.5 ppm	≥ 12.5 ppm			
Oats	1	< 12.5 ppm	≥ 12.5 ppm			
Rye	1	< 12.5 ppm	≥ 12.5 ppm			
Spelt						
Wheat	1	< 12.5 ppm	≥ 12.5 ppm			
Crustacea	10	< 125 ppm	≥ 125 ppm			
Eggs	0.03	< 0.375 ppm	≥ 0.375 ppm			Intentionally added
Finfish	0.1	< 1.25 ppm	≥ 1.25 ppm	24		Action Level 2
Lupin						
Milk	0.1	< 1.25 ppm	≥ 1.25 ppm	0.9		Action Level 1
Mustard						
Other						
Peanut	0.2	< 2.5 ppm	≥ 2.5 ppm	yes		Action Level 2
Sesame	0.2	< 2.5 ppm	≥ 2.5 ppm			
Shellfish/Molluscs						
Soy	1	< 12.5 ppm	≥ 12.5 ppm			Intentionally added
Sulphites						
Tree nuts (Total)	0.1	< 1.25 ppm	≥ 1.25 ppm			

Source: VITAL Online

VITAL Training - 18 endorsed Training Providers

- ✓ Australia and New Zealand
- ✓ North and Sth East Asia
- ✓ Pacific region
- ✓ Africa
- ✓ Europe
- ✓ USA & Canada
- ✓ Mexico & Sth America



Virtual and Online training - >2,500 people trained in VITAL V2.0

- Australia and New Zealand : 2,150 participants
- Other countries : 350 participants

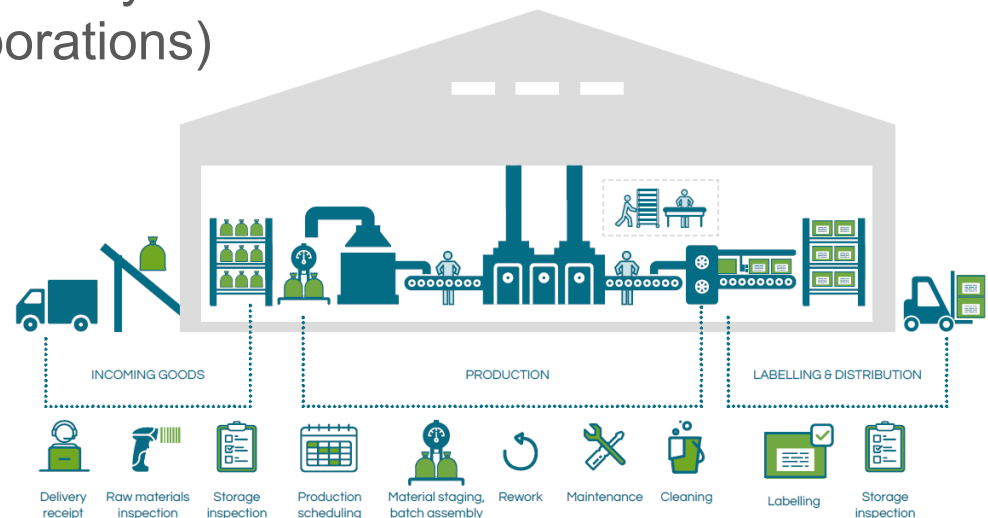
Current Working Groups

- **Phase 3 – Certification**
Pursuing VITAL certification
- **Phase 2 – Risk Communication**
Labelling & pursuing exemptions
- **Phase 1 – Allergen Risk Review**
Expanding & enhancing



Phase 1 - Risk Review Working Group

- ✓ Detailed guidance to investigate allergen status of a food.
- ✓ Interactive webpage accessible from the Allergen Bureau website to guide the user to do Allergen Risk Review, planned launched by Sep 2018
- ✓ Appropriate for a broad food industry audience (local, international, SME, corporations)
- ✓ Entire supply chain from farm to finished product



Risk Review Anomalies

AB & Ai Group - working together on Risk Review Anomalies

Allergens known to be present at significant levels but not formulated as an ingredient and inappropriate to label as “**May be present XXX**”.

These anomalies occur where the process or environment cannot be altered or impacted through good manufacturing practices.

e.g. Dairy in Chocolate due to single conch

Consultation in progress with consumer groups to discuss impact of including these allergens in ingredient lists.



Phase 3 - Certification Working Group

- ✓ Completed drafting the 'VITAL Scheme' under ISO 17065
 - auditable 'VITAL Standard'; plus
 - rules and processes to be followed by accredited certification bodies (to meet ISO 17065)
- ✓ Draft VITAL Standard being trialled by industry to ensure it can be interpreted & applied consistently
- ✓ Draft Scheme to be reviewed by Certification Bodies to ensure it is practical & achievable for industry
- ✓ Seeking JAS-ANZ accreditation of VITAL Scheme in mid-late 2018



Award for **Best Practice in Food Allergen Management**

Some of the important themes from the award applications....

- ✓ Training, training and more training throughout organization.
Including questionnaire to check effectiveness of training.
- ✓ Segregated facilities, tools, utensils, laundry, storage.
Colour coded utensils, cleaning equipment
- ✓ Production scheduling including clearly defining
where in the process an allergen material is added
- ✓ Controls & labelling of rework, part containers.
- ✓ Packaging controls
- ✓ Waste and spill controls
- ✓ Robust cleaning processes
validated by swabbing & rinse water testing
- ✓ Care when selecting new ingredients.
Correct documentation e.g. PIF, Supplier food safety certs
- ✓ Listening to customer voice e.g. via Twitter, FB.
Consumer education to avoid misconceptions.



VITAL[®] 2.0 : Benefits to the allergic consumer

- ✓ consistent approach to assessing cross contact
- ✓ cross contact allergens are declared based upon a standardised risk assessment process
- ✓ founded upon scientific principles
- ✓ clear, accurate and consistent information about the allergen status of the product

Allows the consumer to trust the information

VITAL® 2.0 : Benefits to the food industry

- ✓ Standardised, systematic risk assessment process
- ✓ Suitable for raw materials and finished product
- ✓ Labelling outcomes are based upon science
- ✓ VITAL® Online : user-friendly, web-based VITAL Calculator
- ✓ Supported by regulators

**Provides reassurance by virtue of
informed decision making**

Challenges

- ✓ VITAL[®] Program has regulator support but is voluntary
Allows flexibility around response which is valuable to industry & consumers
- ✓ Perceived cost of compliance
Tiered approach to VITAL Online subscription
Free helpline support via VITAL Coordinator
Continued investment in further industry tools
- ✓ International acceptance of Reference Dose (Threshold) concept
Growing acceptance of the concept and continued science to support the approach
- ✓ Global acceptance of VITAL Program

Conclusion

- ✓ Allergen Bureau continues to respond to stakeholder needs
 - Working groups
 - Investment in development of resources to support allergen management and VITAL
 - Awards for best practice allergen management
- ✓ Collaborate with key stakeholders
 - National Allergy Strategy , Allergen Collaboration
 - FSANZ consultation pieces
 - Codex consultation groups
- ✓ International Collaboration FAMS2019, May 2019 in Melbourne.



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Acknowledgements and Contact Details

Allergen Bureau

- Secretariat (Dr Tom Lewis & Ray Murphy)
- VITAL[®] Coordinator (Georgina Christensen) & Support (Lisa Warren)
- Website: www.allergenbureau.net
- FREE Helpline :
 - email: info@allergenbureau.net
 - International phone: + 61 437 918 959