



informing the food industry

I'm lost!

**How do I work out which
allergen management guidance I need?**

2018 AIFST Convention, Melbourne

Wednesday 12 September 2018



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Allergen management guidance interactive session

Today's speakers and panellists

- **Bill McBride**, Foodlink Management Services, Australia representing GFSI & SQF
- **Lauren Kolstad**, Food Standards Australia New Zealand (FSANZ)
- **Brad Costello**, SAI Global
- **Geoffrey Annison**, Australian Food and Grocery Council (AFGC)
- **Peter Bush**, Food Technology Association of Australia (FTAA)
- **Lisa Warren**, Allergen Bureau
- **Kirsten Grinter**, Allergen Bureau and Nestlé Australia

Facilitated by

- **Tom Lewis**, Allergen Bureau

Allergen management guidance interactive session

Session structure

- **Introduction** 4 mins
- **Guest speakers** 56 mins (7 speakers x 8 minutes each!)
- **Facilitated Q&A** 25 mins
- **Summary & next steps** 5 mins

- **TOTAL** 90 mins



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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



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Allergen management guidance interactive session

OK!
Let's rip into it.



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FOODlink



Benchmarking Allergen Management to GFSI Requirements

Bill McBride, Foodlink Management Services, Australia
representing GFSI & SQF

Global Food Safety Initiative (GFSI)

The Global Food Safety Initiative (GFSI) is a collaboration between some of the world's leading food safety experts from retail, manufacturing and food service industry, as well as service providers associated with the food supply chain.



GFSI Mission

“Continuous improvement in food safety management systems to ensure confidence in the delivery of safe food to consumers.”



GFSI Objective

Once Certified, Recognised Everywhere

- GFSI-recognised Food Safety Certification Programme Owners (CPOs)



CANADAGAP[®]

FSSC 22000



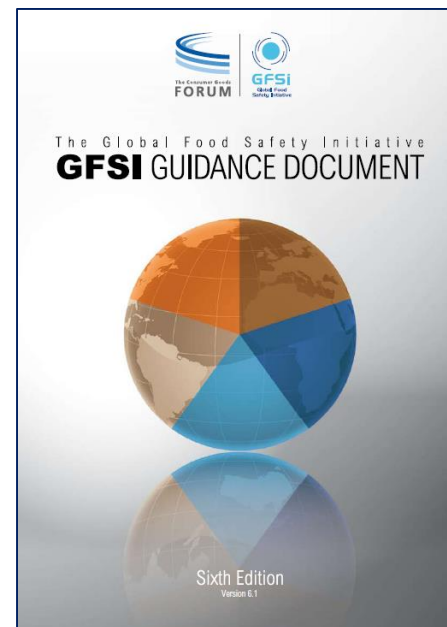
- GFSI recognition acting as a *food safety passport*



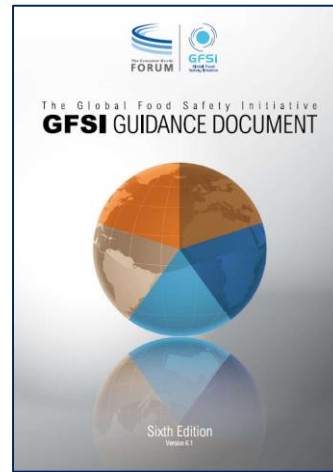
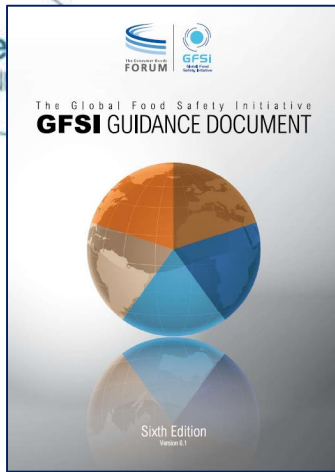
Allergens - GFSI Guidance v 6.0 – 6.3

HACCP EL1

The standard shall require that the organisation have in place a Hazard Analysis and Critical Control Point system (HACCP) to demonstrate food safety management. The HACCP system shall be systematic, comprehensive and thorough and shall be based on the Codex Alimentarius HACCP principles or those principles specified by the National Advisory Committee on Microbiological Criteria for Foods (NACMCF). The HACCP system shall be capable of accommodating change, such as advances in equipment design, processing procedures or technological developments. **The hazard analysis, where appropriate, shall include allergens.**



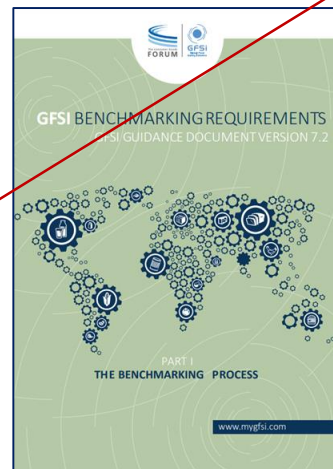
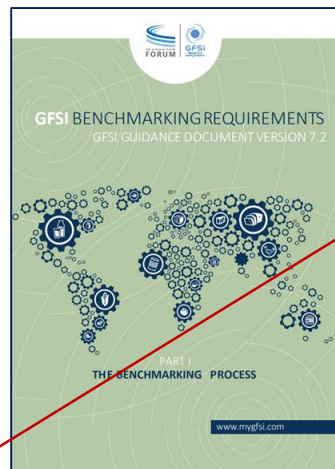
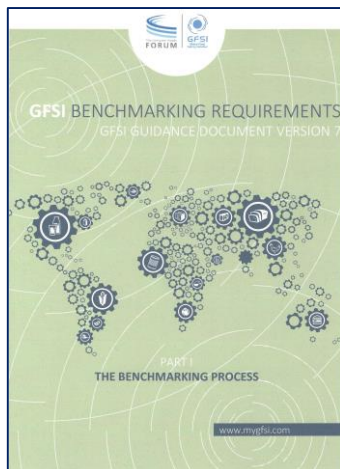
(2011 – 2017)



Sixth edition, Jan 2011



Version 6.3, Oct 2013



BR 7.0, Mar 2017



BR 7.1, Apr 2017



BE 7.2 Mar 2018

GFSI BR 7 (2017)

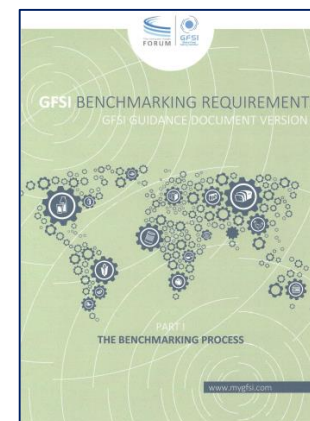
- Benchmarking Requirements Document, version 7.0 was published on March 6, 2017
 - v.7.1 published April, 2017
 - v.7.2 published March 2, 2018
- Scheme Owners now Certification Program Owners (CPOs)
- Food Fraud has been added as a FSM
- Additional components added to address FSMA gap
- Added compliance for CPOs
- Existing CPOs are recognized for 2018



Allergens - GFSI Requirements v 7.0 (Draft)

EI: Processing of Perishable Animal Products

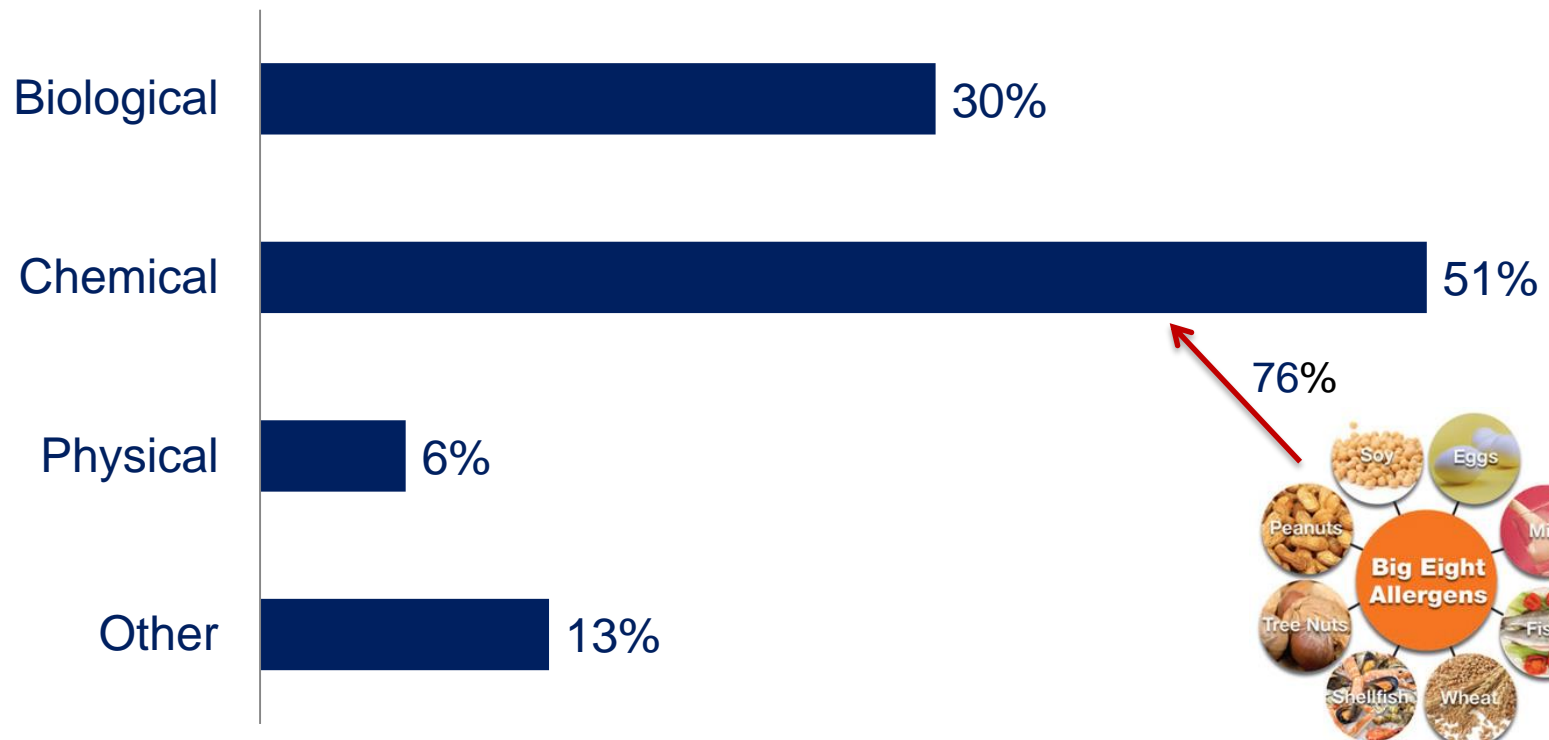
EIV: Processing of Ambient Stable Products



Allergen management	The standard shall require that an allergen management plan is in place in all food manufacturing facilities. This shall include a risk assessment of allergen cross contact and implemented controls to reduce or eliminate the risk of cross contact.
Allergen labelling	The standard shall require that all finished products intentionally or potentially containing allergenic materials are labelled according to the allergen labelling regulations in the country of destination.

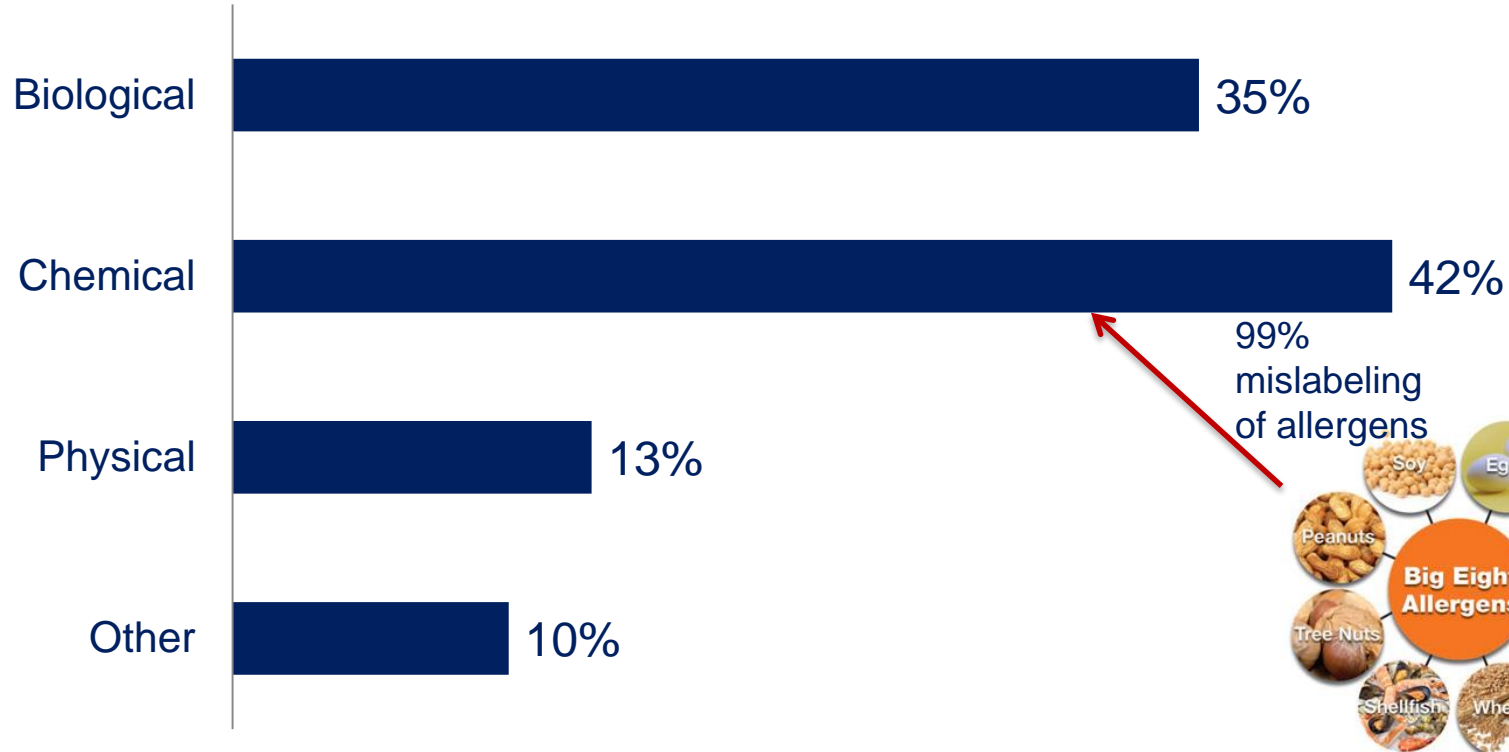
Reported Supplier Recalls 2015

(collected by SQF, from USA, Canada, and Australia)



Reported Supplier Recalls 2016

(collected by SQF, from USA, Canada, and Australia)





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Letter to GFSI Nov 2016

“The inclusion of allergen management and allergen labelling (FSM 28, 29) in EI and EIV is welcomed.

However, the same elements should also have been included in D, EII, EIII and L.

Poor allergen control and labelling is the single major cause of recalls in many developed countries. It must be included in all manufacturing scopes.”

LeAnn Chuboff, Vice President Technical Affairs, SQFI

Allergens - GFSI Requirements v 7.0 – 7.2

AI: Farming of Animals

All: Farming of Fish

BI: Farming of Plants

BI: Farming of Grains and Pulses

C: Animal Conversion

D: Pre-process Handling of Plant Products

EI: Processing of Perishable Animal Products

Ell: Processing of Perishable Plant Products

Elll: Processing of Perishable Animal and Plant Products

ElIV: Processing of Ambient Stable Products

L: Production of Biochemicals

F: Production of Feed

J: Provision of storage and distribution services

M: Production of Food Packaging

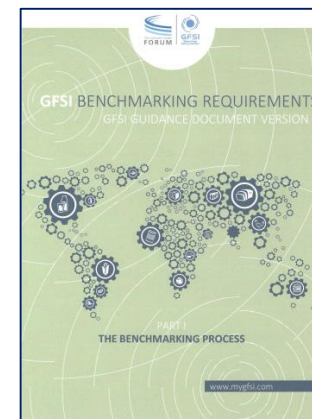
N: Food Broker/Agent

Allergen Management:

The standard shall require that an allergen management plan is in place in all food manufacturing facilities. This shall include a risk assessment of allergen cross contact and implemented controls to reduce or eliminate the risk of cross contact.

Allergen Labelling:

The standard shall require that all finished products intentionally or potentially containing allergenic materials are labelled according to the allergen labelling regulations in the country of destination.

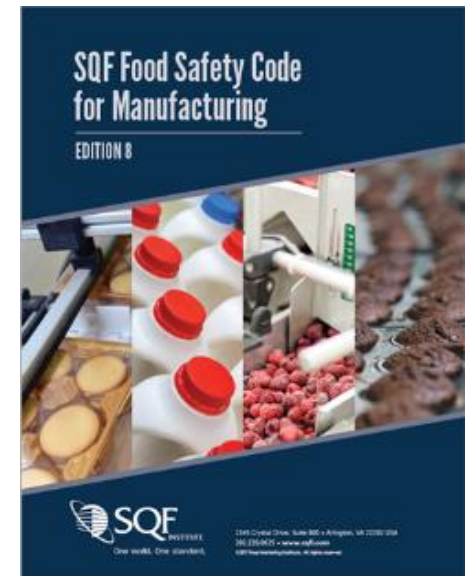


SQF ed 8, 2.8 Allergen Management

2.8.1 Allergen Management for Food Manufacturing (Mandatory)

2.8.1.1 The responsibility and methods used to control allergens and to prevent sources of allergens from contaminating product shall be documented and implemented. The allergen management program shall include:

- A risk analysis of those raw materials, ingredients and processing aids, including food grade lubricants, that contain food allergens;
- An assessment of workplace-related food allergens from locker rooms, vending machines, lunch rooms, visitors;
- A register of allergens which is applicable in the country of manufacture and the country (ies) of destination if known;
- A list of allergens which is accessible by relevant staff.
- The hazards associated with allergens and their control incorporated into the food safety plan.
- A management plan for control of identified allergens.



SQF ed 8, 2.8 Allergen Management

2.8.1.2 Instruction on identification and handling

2.8.1.3 Segregation of foods containing allergens

2.8.1.4 Cleaning and sanitation

2.8.1.5 Validation of cleaning

2.8.1.6 Product changeover

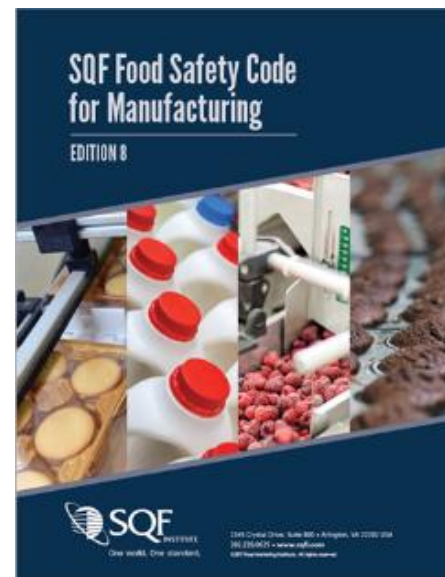
2.8.1.7 Product identification

2.8.1.8 Label accuracy

2.8.1.9 Traceability of ingredients

2.8.1.10 Rework

2.8.1.11 Unintended allergens



www.sqfi.com/documents

Allergens – Other GFSI CPOs



FSSC 22000, version 4.1

2.1.4.6 Management of allergens (for categories C, I and K only)

- 1) A documented allergen management plan shall be in place that includes: a) risk assessment addressing potential allergen cross contamination; b) control measures to reduce or eliminate the risk of cross contamination; c) validation and verification of effective implementation.
- 2) All finished products intentionally or potentially containing allergenic materials are labeled according to the allergen labelling regulations in the country of manufacture and country of destination.



BRC GLOBAL STANDARD FOR FOOD SAFETY ISSUE 8

5.3 The site shall have a system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling in the country of sale

- 5.3.1 Raw material, ingredient risk assessment
- 5.3.2 Identification of allergen-containing materials
- 5.3.3 Identification of routes of contamination
- 5.3.4 Management of allergenic materials
- 5.3.5 Control of rework
- 5.3.6 Warning on label of risk of cross-contact
- 5.3.7 Validation of claims



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FOOD STANDARDS
Australia New Zealand
Te Mana Kounga Kai – Ahitereiria me Aotearoa

International agreements on allergen management and the Food Standards Code mandatory allergen declarations

Lauren Kolstad, Food Standards Australia New Zealand



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FOOD STANDARDS
Australia New Zealand
Te Mana Kounga Kai – Ahitereiria me Aotearoa



Food and Agriculture
Organization of the
United Nations



World Health
Organization

International agreements

Codex Committee on Food Hygiene

- The revision of the Codex General Principles of Food Hygiene will include allergenic contamination as a key hygiene control measure
- New work - *Code of Practice on food allergen management* approved by CAC mid 2018

Consultation

- Working group co-chaired by Australia, USA and the UK
- Feedback from Australian interested parties on format and proposed provisions for both general content and specific topics
- Additional input being sought to inform Australia's position on the draft for discussion at CCFH in November 2018

CCFH - Draft Code of Practice

- Through chain allergen management
- IgE-mediated and non Ig-E-mediated food allergies and hypersensitivities
- Top eight immunological response-associated food groups/types as the allergens of most significance globally
- Should it address thresholds/dose response?
- CCFL also considering new work on allergens
 - alignment with CCFH

CCFH and CCFL

- The CCFH Code of Practice
 - guidance for developing policies
 - procedures to identify allergens
 - implementing allergen management practices.
- Allergen management includes labelling
 - CCFL develops standards for labelling

Codex Committee on Food Labelling

- Currently considering allergen labelling
- Discussion paper for next CCFL meeting (May 2019)
- Australia is leading this with UK and USA
- May lead to new work proposal



FSC - Allergen labelling



Declare the presence of certain allergens and substances
(few exemptions)

- The Code requires declaration, but not **how** to declare
- Unlabelled foods – displayed or provided upon request
- Some allergen information is voluntary e.g. ‘may contain...’



Standard 1.2.3 Declarations

Cereals containing gluten



Soy



**Sesame
Seed**



Tree nuts



Sulphites



Lupin



Milk



Peanut



Crustacea



Egg



Fish



Exemptions

Before 2016



Coconut
(*Cocos nucifera*)



Isinglass
(from fish swim bladders)

After 2016

Glucose syrups from wheat starch

- Gluten to lowest level reasonable achieved
- Gluten also ≤ 20 mg/kg

Alcohol distilled from wheat or whey



Soybean oil

- Degummed, neutralised, bleached or deodorised

Soybean derivatives

- Tocopherols
- Phytosterols





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Interpreting guidance and regulations in relation to Retailers Allergen Requirements

Brad Costello, SAI Global

Meeting Regulatory Requirements

- Auditors need to confirm Regulatory Requirements are being met at each and every audit.



Retailers Requirements

Standard in their own right



'Bolt On' to the GFSI base standards



Guidelines to Auditors

One full Product Assessment for each program / audit should include:

- Traceability including confirmation of allergen management and control



Training, Sign Off and Technical Support



Retailer Allergen Requirements

- Embrace all regulatory requirements
- Additional requirements are over and above the regulatory requirements
- Retailer product specific



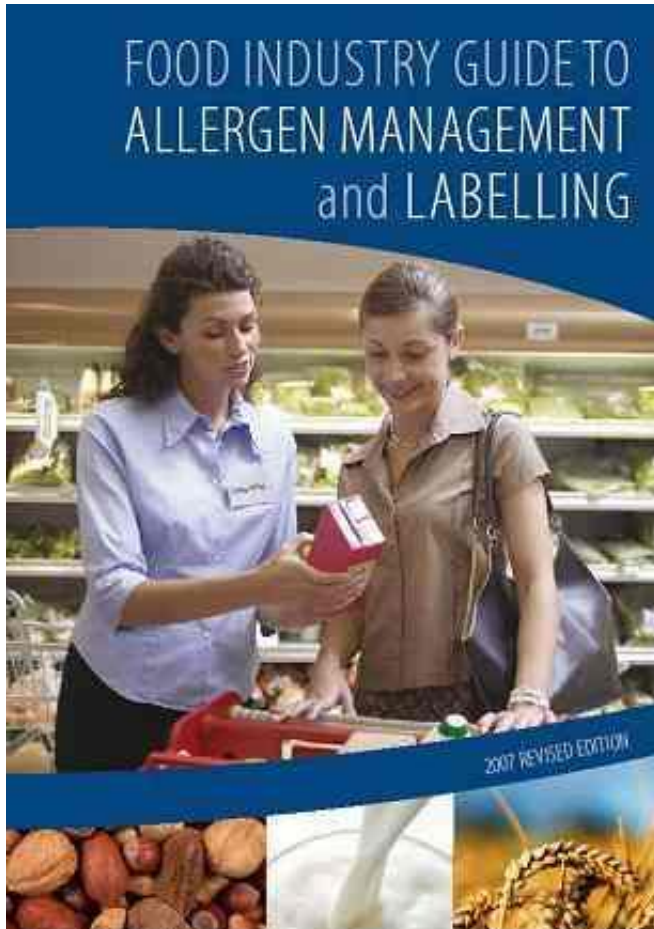


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AFGC Allergen Management and Labelling Guide

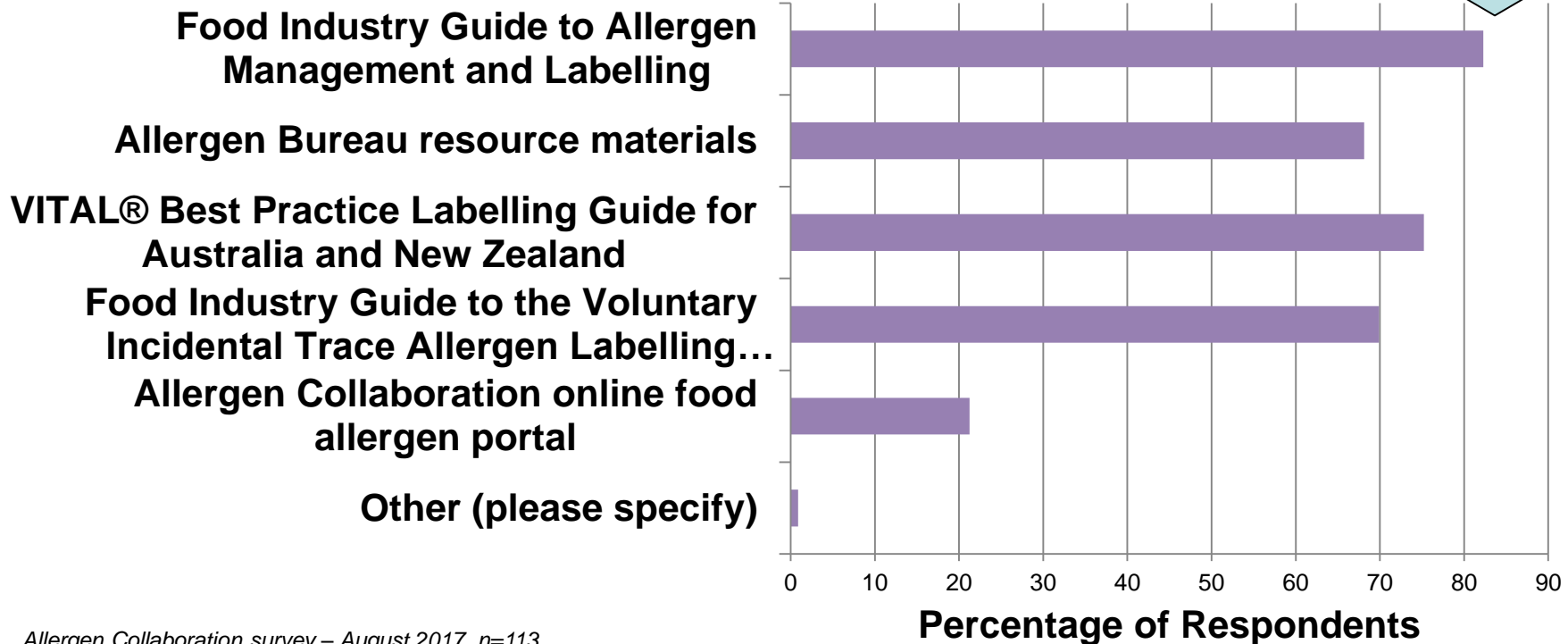
Dr Geoffrey Annison
Australian Food and Grocery Council



- ✓ Launched in June 2007
- ✓ Freely available to industry:
 - AFGC website
 - Allergen Bureau website
 - Food Allergen Portal
- ✓ Developed by AFGC Allergen Forum members
- ✓ Developed for companies of all sizes to support allergen management and labelling

Awareness of the Guide

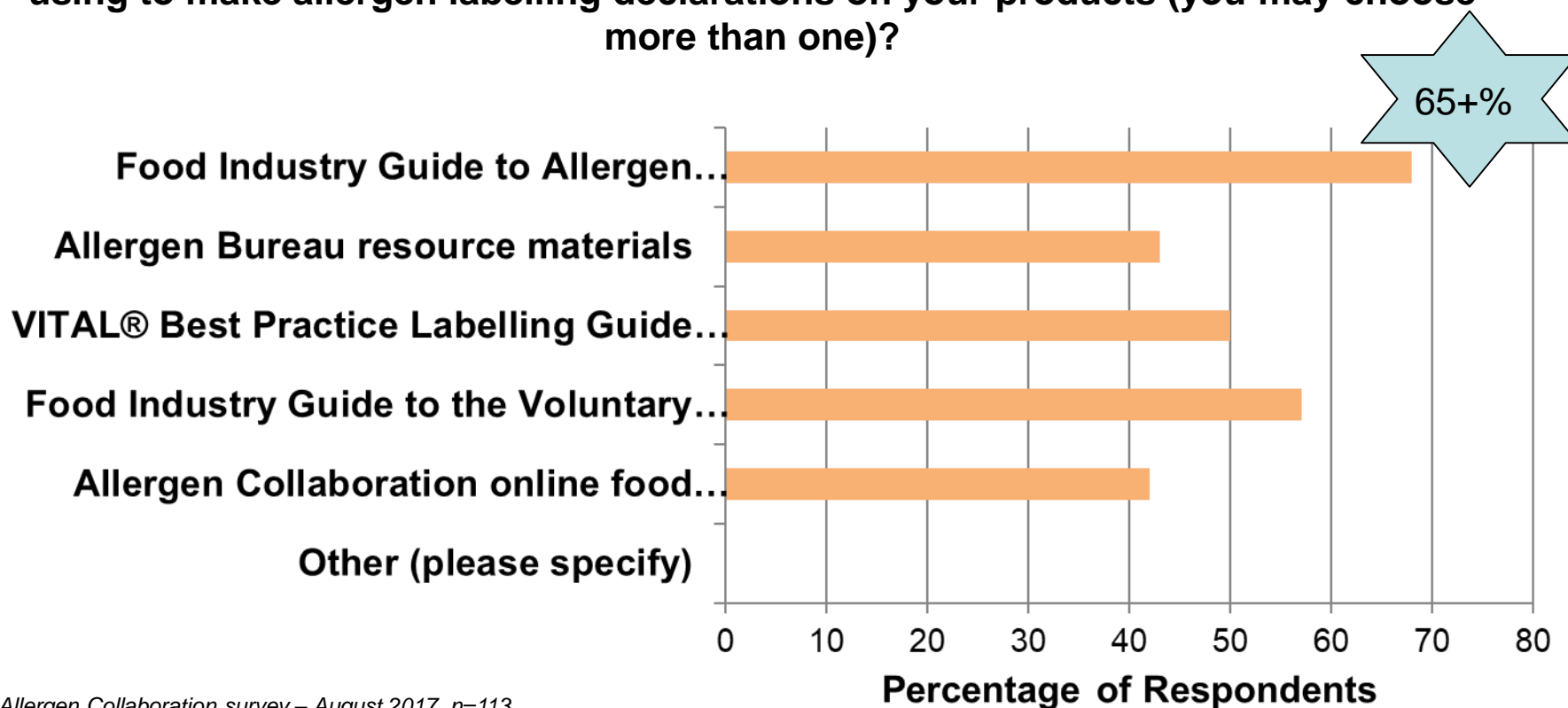
Q: Which of the following allergen labelling initiatives are you aware of (you may choose more than one):



Allergen Collaboration survey – August 2017, n=113

Usage of the Guide

Q: Of the initiatives selected in Question 4, which are your company actively using to make allergen labelling declarations on your products (you may choose more than one)?



Allergen Collaboration survey – August 2017, n=113

Review of the Guide

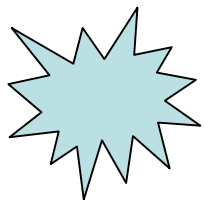


Aim:

- to update existing information and guidance
- provide additional information based on knowledge of allergen management issues and feedback from industry.

Key changes – updates

- ✓ Background on food allergy – incidence data
- ✓ Regulatory requirements – exemptions, international
- ✓ Allergen Management - expanded
- ✓ Allergen Analysis
- ✓ Allergen Declaration - expanded



VITAL[®] - information reduced and reference to VITAL[®] resources – avoiding duplication

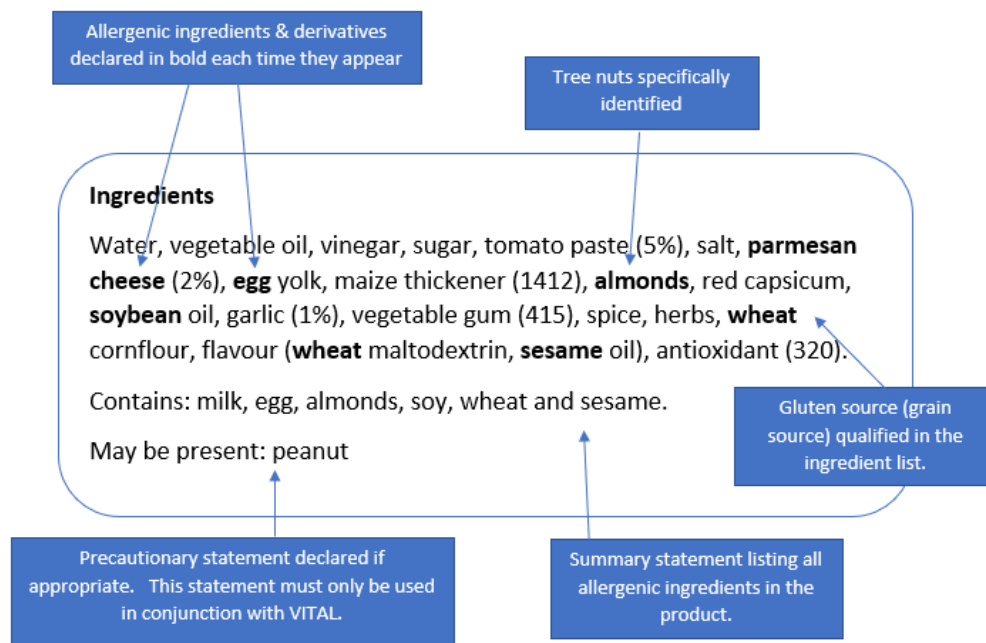
Updates – Allergen Management

Based on checklist developed as part of the National Approach to Food Safety Certification (NAFSC) project



Updates – Allergen Declaration

No change to best practice allergen labelling format



Updates – Allergen Declaration

Table 3: Composing allergen declaration – packaged foods

Step	Description	Reference/Resource
1	Obtain the product formulation/recipe including amounts of each ingredient.	
2	Obtain Product Information Forms (PIFs) and/or specifications for all ingredients. Ensure all sources of allergens as ingredients and cross contact allergens are identified and recorded.	✓ AFGC - Product Information Form (PIF)
3	Identify allergens in the product using the formulation and ingredient information, including: ✓ Ingredients ✓ Food additives ✓ Processing aids ✓ Compound ingredients ✓ Cross contact from ingredients	✓ ANZ Food Standards Code Standard 1.2.3 ✓ AFGC - Product Information Form (PIF) ✓ AFGC – Allergen Management and Labelling Guide ✓ Allergen Bureau - VITAL Guide (2012) ✓ Allergen Bureau - Unexpected Allergens in Food
4	Compose the ingredient list and declare the allergens formulated into the product.	✓ ANZ Food Standards Code Standard 1.2.3 ✓ AFGC – Allergen Management and Labelling Guide ✓ Allergen Bureau - VITAL Best Practice Labelling Guide
5	Conduct a VITAL risk assessment to determine the presence of cross contact allergens from ingredients and processing.	✓ Allergen Bureau - VITAL Guide (2012) ✓ Allergen Bureau – VITAL Online (web-based calculator) ✓ Allergen Bureau – VITAL Q&As
6	Finalise allergen labelling: ✓ confirm the allergens in the ingredient list, ✓ confirm the allergen summary statement, and ✓ compose the appropriate precautionary statement	✓ Allergen Bureau – VITAL Online (web-based calculator) ✓ AFGC – Allergen Management and Labelling Guide ✓ Allergen Bureau - VITAL Best Practice Labelling Guide



New table to step through developing allergen declarations and references/resources to assist



Developed with the Allergen Bureau – consistent across the Guide and Allergen Bureau

Key changes – new

- ✓ Case Studies
- ✓ Allergen Claims – free from, gluten free
- ✓ Allergen Communication:

Focus on consumer facing communications in relation to the allergen status of food products:

- ❖ Consumer Information - Website Information
- ❖ Customer Contact - Customer Care Lines
- ❖ Allergen Status Change Communication
- ❖ Recall Communication



Timing

- ✓ Update current draft to incorporate feedback received from targeted consultation
- ✓ 2nd round of targeted consultation – early October 2018
- ✓ Release late November 2018



FOOD INDUSTRY GUIDE TO ALLERGEN
MANAGEMENT AND LABELLING

REVISED EDITION - September 2018





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FTAA
FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA

FTAA Allergen Protocols

Peter Bush, CFS FAIFST

Food Technology Association of Australia



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Background to the Project

- 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
- 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)

- It is difficult to obtain actual numbers of SME's including catering establishments that need to be allergen aware. Conservatively, it could be between 80,000 and 100,000 (including approx. 20,000 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

RECALLS DUE TO UNDECLARED ALLERGENS

YEAR 2015 – 39

YEAR 2016 – 33

YEAR 2017 – 34

YEAR 2018 – 32 (8 MONTHS TO 16/08/18)

FIGURES COURTESY OF THE FSANZ WEB SITE AS AT 16/08/18

- The WORKING GROUP is currently assembling the DRAFT Manual text
- The Group comprises members from:
the Allergen Bureau; Dairy Food Safety Victoria;
DTS Food Labs; Lion Co; NMI; Robin Sherlock; Simplot;
plus members of the of the FTAA Technical Committee

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
- IN-PLANT 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

TIMING

END September 2018

- first rough draft of handbook

January 2019

- final text of handbook

Then the big challenge commences:-

- How to reach Importers, SME's, EHO's and Health Departments

(The main team is currently working on this – but any assistance or suggestions appreciated)



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Thank
You



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VITAL[®]

an initiative of the Allergen Bureau

Allergen Bureau Risk Review interactive website

Lisa Warren, Allergen Bureau



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an initiative of the Allergen Bureau

VITAL[®] Phase 1 – Risk Review Working Group

Susan Colling, Newly Weds Foods

Alan Edwards, NSW Food Authority

Jessica Feather, Woolworths

Amanda Hawkins, Cerebos

Jasmine Lacis-Lee, DTS Food Assurance

Kaye Wood, Nestlé Australia

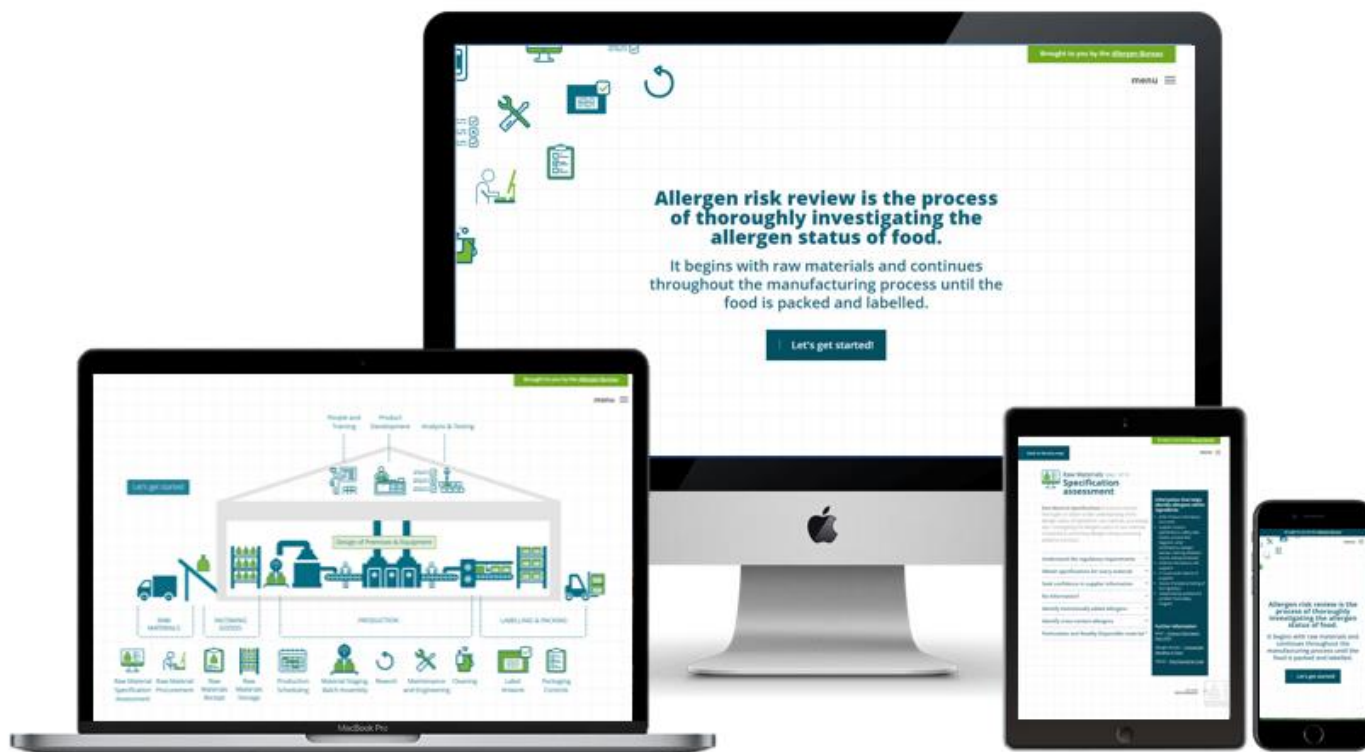
Lisa Warren, Allergen Bureau (Project Lead)

Kirsten Grinter, Nestlé Australia (Sponsor, Allergen Bureau President)

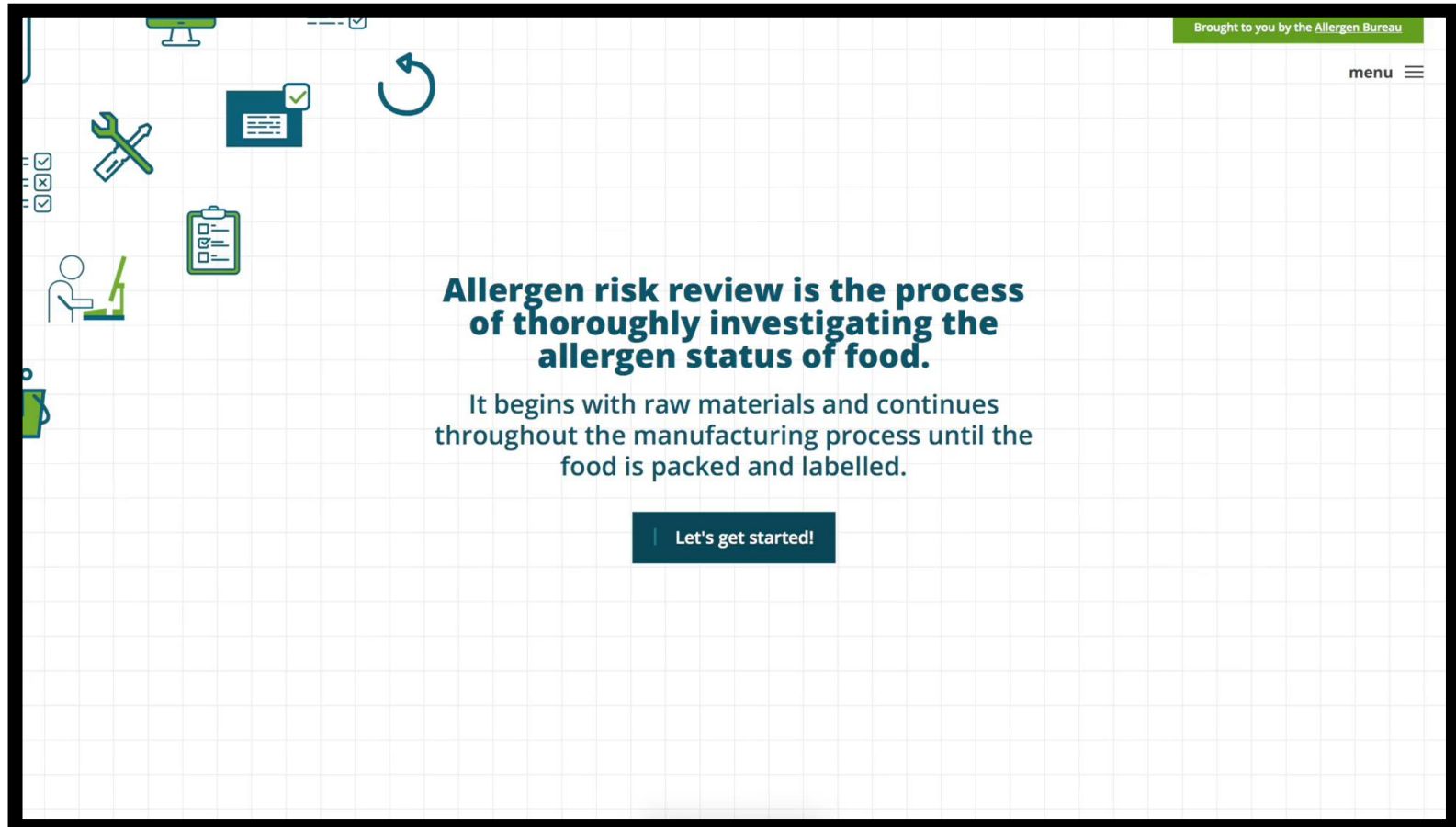
Risk Review – Project Brief

- Helpful guidance on investigating the allergen status of food
- Appropriate for a broad food industry audience (local, international, SME, corporations)
- Expandable to include entire supply chain from primary production to finished product and food service
- Lots of detail, but easy to use
- **Modern new approach!**

The Risk Review interactive website

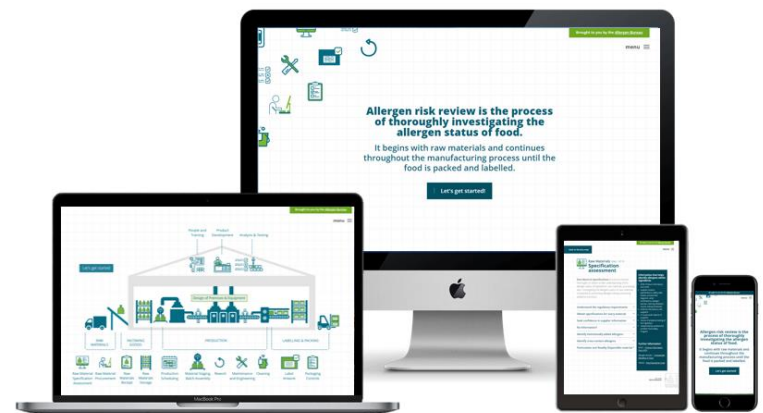


The Risk Review interactive website



Key timings to launch of Risk Review website

- 12th Sept 2018 Today! – this AIFST allergen session
- Sept 2018 Edit, edit, and edit again
- 25th Oct 2018 Allergen Bureau AGM & Member Meeting – invite **our members** to trial and comment
- Nov 2018 Risk Review website Live!





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VITAL[®]

an initiative of the Allergen Bureau

The Allergen Bureau VITAL[®] Program, Draft VITAL Standard, and the VITAL Best Practice Allergen Labelling Guide for ANZ

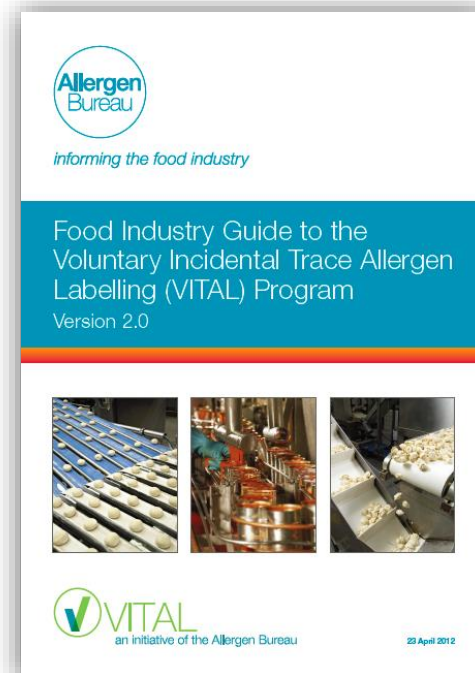
Kirsten Grinter, Allergen Bureau and Nestlé Australia

The VITAL[®] Program

The VITAL (Voluntary Incidental Trace Allergen Labelling) Program is a standardised allergen risk assessment process for food industry

- ✓ Science-based labelling outcomes
- ✓ Suitable for raw materials & finished product
- ✓ VITAL Online – web-based, VITAL Calculator
- ✓ Supported by regulators

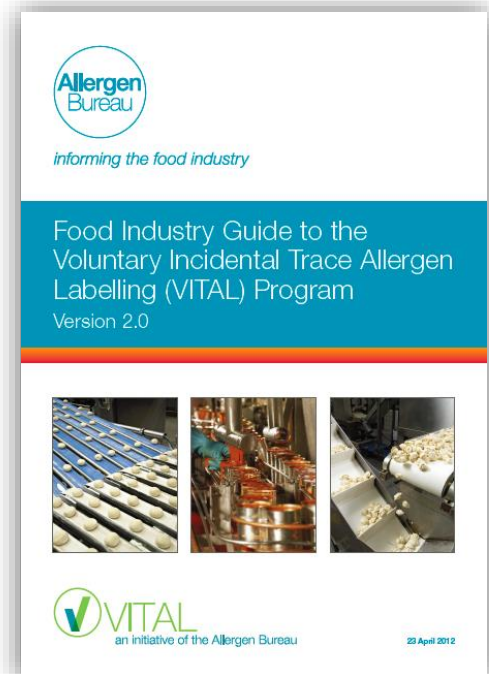
Provides reassurance through informed decision making



The 10 Steps of VITAL[®] - 'The VITAL Procedure'

1. Determination of relevant allergens
2. Identification of intentionally added allergens
3. Identification and quantification of cross contact allergens due to ingredients
4. Identification and 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!



The VITAL[®] Scientific Expert Panel (VSEP) overarching scientific approach

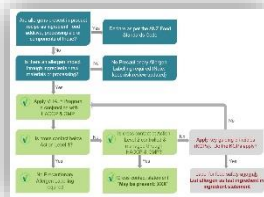
- analysed existing published clinical data and some unpublished data (>1800 data points)
- statistical modelling to look at implication for the allergic population
- scientifically and clinically sound, defensible and transparent
- published papers (Taylor *et al* 2014, Allen *et al* 2014)
- protection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

**Next VSEP meeting 16 Oct 2018,
EAACI-FAAM Copenhagen**



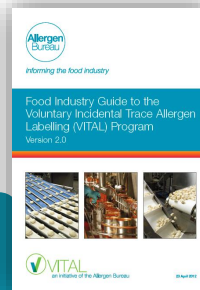


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Risk Review
Anomalies

VITAL Program



Tools & Helpline



VSEP



Training
Providers



VITAL Online



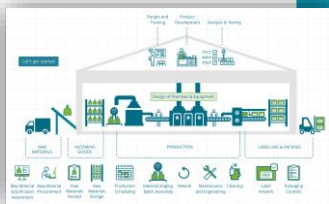
(WG2)
Communication

Ingredient List	Water, potato, carrots, celery, brown rice, oats , peanut oil, yeast extract (barley).
Allergen Summary Statement	Contains cereals containing gluten, peanut.
The VITAL Preliminary Statement	May be present: wheat.

(WG3)
Certification



(WG1) Risk
Review



The VITAL® Framework

VITAL[®] Phase 3 - Certification Working Group

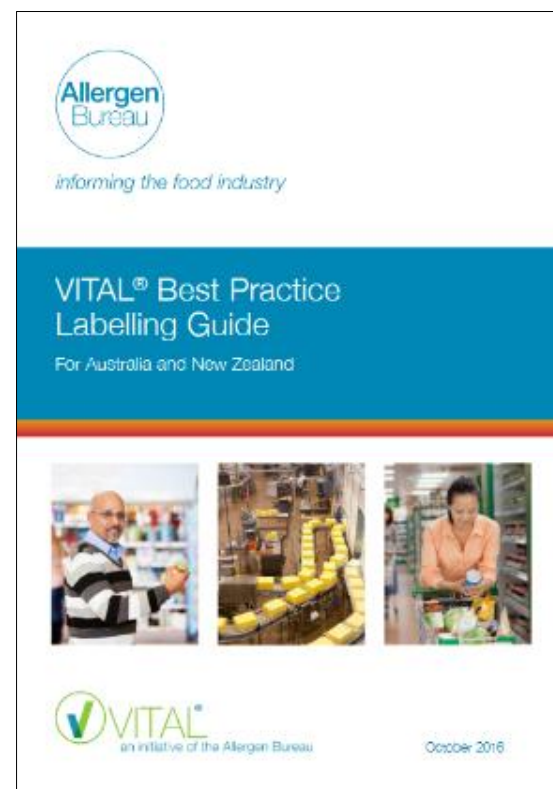
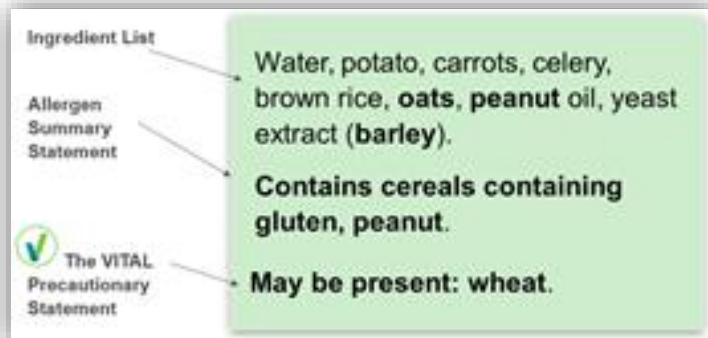
- ✓ Completed drafting the 'VITAL Scheme' under ISO 17065 (**thanks Bill McBride!**)
 - auditable 'VITAL Standard'; plus
 - rules and processes to be followed by accredited certification bodies (to meet ISO 17065)
- ✓ 'Bolt-on' to GFSI-recognised Standards + HACCP-based AMPs
- ✓ Draft VITAL Standard 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 late 2018



VITAL[®] Best Practice Labelling Guide for ANZ

- ✓ Steps for composing an ingredient list that declares allergens clearly
- ✓ Five worked examples that show best practice for declaring food allergens on a label
- ✓ Key word definitions
- ✓ References to other allergen declaration guidance





informing the food industry



Working together for the benefit of
the allergic consumer and food industry



informing the food industry

Allergen management guidance interactive session

Facilitated Q&A

Our Panel and **Tom Lewis**, Allergen Bureau



FOODlink



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Te Mana Kounga Kai - Ahitereiria me Aotearoa



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GROCERY**
COUNCIL



FTAA
FOOD TECHNOLOGY ASSOCIATION OF AUSTRALIA



VITAL[®]

an initiative of the Allergen Bureau

Facilitated Q&A

Key issues

- How do we get information about allergen management to the multitude of small food enterprises?
- Key role of auditors in information dissemination and education
- Understanding allergen analysis variability within risk assessment and communication systems
- Communication and coordination between the various organisations providing allergen management guidance
- VITAL[®] cross contact management best practice, how it has evolved and the science that underpins the Reference Doses

Allergen management guidance interactive session

Summary & next steps

Kirsten Grinter, Allergen Bureau and Nestlé Australia



Summary & next steps

- Allergen Bureau has a key role in facilitating communication among organisations providing allergen management guidance
- Consider the most effective ways to make food allergen management guidance available to food industry communicators
- Delivery of this guidance using platforms and mechanisms best suited for food industry learning outcomes