



# **VITAL<sup>®</sup> Certification Standard for Allergen Management**

& supporting resources

Tues 10 Mar 2020

Food Safety & Compliance Conference, Auckland

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(GM – Operations & Quality ANZ, Hawkins Watts)



# Who is the Allergen Bureau?

- **Peak industry body** representing food industry allergen management in Australia and New Zealand
- **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', Allergen Bureau Directors provide voluntary, unpaid services

## Global Members



## Full Members



• Cargill Protein Europe

# Our Vision

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





## Our Mission

To facilitate a globally accepted, consistent, science-based approach to food allergen risk assessment, management and communication that:

- assists allergen sensitive **consumers** to make informed choices based on label information
- guides **industry** best practice

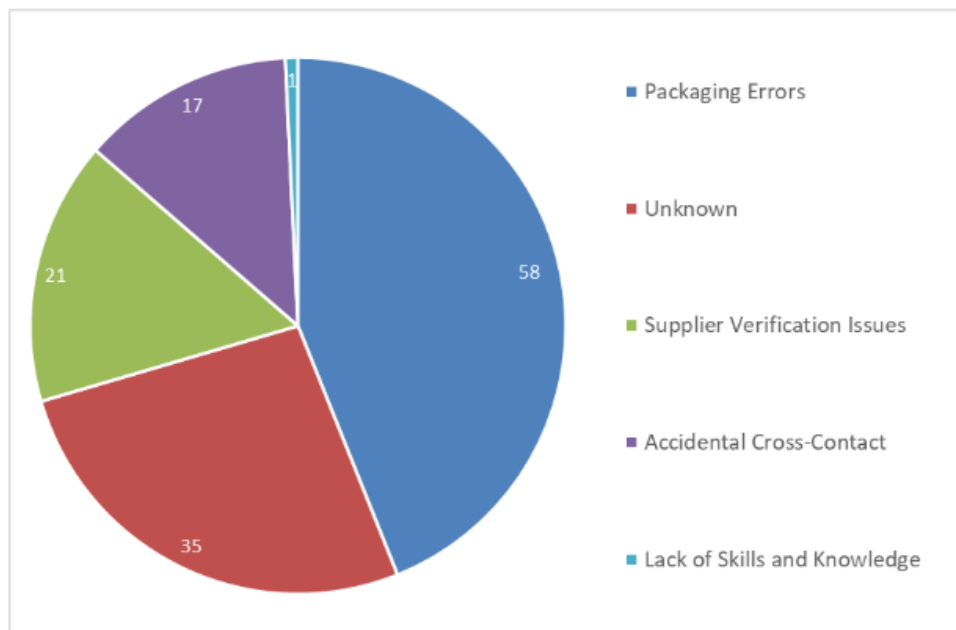




# Food Recalls (FSANZ website)

The most common reasons for undeclared allergen recalls coordinated by FSANZ

Figure 3. Root cause for all undeclared allergen food recalls (mid-2016 – 2019)



## Corrective actions

- Training of staff
- Improved communication procedures
- Altered product ingredients
- Altered product label
- Changed suppliers
- New/changed equipment
- Amended processing/handling procedures
- Identified new critical control points
- Improved manufacturing process (GMP's)
- Improved hygiene practices (GHP's)
- Other

# Labelling examples



## INGREDIENTS

LEGUMES (40%) (WHITE BEAN FLOUR (13%), GREEN PEA FLOUR (13%), PINTO BEAN FLOUR (13%)), POTATO STARCH, SUNFLOWER OIL, MODIFIED POTATO STARCH, SALT, POTASSIUM CHLORIDE, SPINACH POWDER, BEETROOT POWDER.

Contains Gluten.

Contains Milk or Milk Products.

Contain Soybeans or Soybean Products.

# Labelling examples



# Labelling examples –

Same/Similar product but 3 different allergen positions

## 39g Crème Egg

Contains: Milk, Wheat  
Glucose Syrup, Soy and Egg  
May contain: Traces of  
Peanuts and Tree Nuts



Contains: Milk, Soy + Egg and Wheat

## 130g Crème Egg Minis

Contains: Milk & Soy  
May contain: Traces of  
Peanuts and Tree Nuts



Contains: Milk, Soy

## 234g Crème Egg Bag

Contains: Milk, Wheat,  
Glucose Syrup, Soy and Egg  
May contain: Traces of  
Peanuts and Tree Nuts



## 180g Cadbury Dairy Milk Packed with Crème Egg Block

Contains: Milk and Soy

May Contain: Traces of  
Wheat, Peanuts and Tree Nuts.







# Allergen Labelling (P1044 PEAL)

- Proposal submissions - 27 Feb 2020
- Separate declaration of molluscs, individual tree nuts (9), wheat and other gluten cereals
- Mandatory terms – referred names, and 'gluten' & 'tree nut'.

## The FSANZ Proposal

- Option 1: Maintain the status quo (i.e. no change to allergen declaration requirements).
- Option 2: Declare allergens using mandatory specified terms in bold font.
- Option 3: Declare allergens using mandatory specified terms in bold font, with additional requirements to declare in the statement of ingredients as well as in a separate allergen summary statement.

# Referred names (P1044 PEAL)



Item	Column 1	Column 2	Column 3	Column 4
	Food	Exemption	Required name for declarations other than declarations in a summary statement	Required name for declarations in a summary statement
1	added sulphites in concentrations of 10 mg/kg or more		sulphites	sulphites
2	Any of the following cereals (including hybridised strains thereof) if they contain *gluten:	the cereal or its hybridised strain that is present in beer or spirits		
	barley		barley	gluten
	oats		oats	gluten
	rye		rye	gluten
	spelt		spelt	gluten
3	wheat (including its hybridised strain) irrespective of whether it contains gluten	(a) the wheat or its hybridised strain that is present in beer or spirits; (b) glucose syrups made from wheat starch and that: (i) have been subject to a refining process that has removed gluten protein content to the lowest level that is reasonably achievable; and (ii) have a gluten protein content that does not exceed 20 mg/kg; (c) alcohol distilled from wheat.	wheat	(a) wheat; and (b) if gluten is present - gluten.

4	Any of the following tree nuts:			
	almond		almond	tree nut
	brazil nut		brazil nut	tree nut
	cashew		cashew	tree nut
	hazelnut		hazelnut	tree nut
	macadamia		macadamia	tree nut
	pecan		pecan	tree nut
	pine nut		pine nut	tree nut
	pistachio		pistachio	tree nut
	walnut		walnut	tree nut
5	crustacea		crustacean	crustacean
6	egg		egg	egg
7	fish	isinglass derived from fish swim bladders and used as a clarifying agent in beer or wine	fish	fish
8	lupin		lupin	lupin
9	milk	alcohol distilled from whey	milk	milk
10	mollusc		mollusc	mollusc
11	peanut		peanut	peanut
12	sesame seed		sesame	sesame
13	soybean	(a) soybean oil that has been degummed, neutralised, bleached and deodorised; (b) soybean derivatives that are tocopherol or phytosterol.	soy, soya or soybean	soy



# Allergen Labelling (P1044 PEAL)

**Ingredient list** - allergens in bold, same text size & typeface, legible, using 'referred names' (PEAL)

**Allergen Summary Statement** - allergens in bold, same text size & typeface, legible, using 'referred names', beginning with 'contains', immediately below the ingredient list (PEAL)

**Precautionary Allergen Labelling Statement (PAL)** – VOLUNTARY.

## Example of Option 3

**INGREDIENTS**

Rolled **oats**, glucose syrup, **almond** meal, **peanut** pieces, honey, coconut.

**Contains gluten, tree nut, peanut**

**May be present: wheat**

✔ Recommend VITAL<sup>®</sup> best practice labelling for consistent communication

# Codex Alimentarius Commission

## Code of practice on food allergen management for food business operators

- The Allergen Bureau provided comment in Sep 2019, on Step 6 of this draft Code of practice.
- The proposed scope of the Code is to cover allergen management, including controls to prevent cross contact, throughout the supply chain from food production and manufacturing through to retail and food service.



# The VITAL<sup>®</sup> Standard

To address the need for external verification of products to show that the VITAL process is in control.

i.e. How does the allergic consumer trust the allergen status of a food product?





# Vital Certification Working Group



Bill McBride	Foodlink Management Services
Coral Colyer	Goodman Fielder
Craig Miller	SGS Australia
David Henning	Allergen Bureau
Debra Newbold	SGS Australia
Evangelia Komitopoulou	SGS United Kingdom Limited
Fiona Fleming	FJ Fleming Food Consulting
Georgie Christensen	Allergen Bureau
Linda Derrett	Metcash Trading
Lisa Warren	Allergen Bureau
Lyn Butler	Busigroup International Pty Ltd
Nerolie Dever	Sanitarium Health Food Company
Peter Ng	Woolworths
Ray Murphy	Allergen Bureau
Robin Sherlock	DTS Food Assurance



# The VITAL Standard

## Objectives

- Voluntary
- Consumer visibility
- Cost effective
- Internationally recognised
- Robust
- Product specific
- Auditable



*Informing the food industry*

VITAL<sup>®</sup> Standard

Version 1.0



 VITAL<sup>®</sup>  
an initiative of the Allergen Bureau

October 2019



# VITAL Scheme

VITAL Scheme consists of the:

## 1. VITAL Standard

- Part A: Scheme Management
- Part B: The auditable VITAL Standard

## 2. Certification Body Requirements

- rules and processes to be followed by accredited Certification Bodies (in line with ISO 17065)







# Pre-requisites

The manufacturing site shall:

- Be certified to a GSFI recognised Food Safety Management Standard (FSMS) that includes allergen management;
- and
- Have documented and implemented a HACCP based Allergen Management Plan (irrespective of requirements of FSMS)





# Part B: The VITAL Std



<b>1.</b>	<b>Management Commitment</b>
1.1	Management Responsibility
1.2	Management Review
<b>2.</b>	<b>Pre-requisites</b>
2.1	Food Safety Management Standard
2.2	Allergen Management Pre-requisites
<b>3.</b>	<b>Allergen Identification</b>
3.1	Determination of relevant allergens
3.2	Identification of intentionally added allergens
3.3	Identification of unintentional (i.e. cross contact) allergens from materials/ingredients
3.4	Identification of unintentional (i.e. cross contact) allergens due to processing
<b>4.</b>	<b>Quantification of cross contact allergens</b>
4.1	Particulate cross contact allergens
4.2	Readily dispersible cross contact allergens from materials or ingredients
4.3	Readily dispersible cross contact allergens due to processing
4.4	Calculation of total cross contact allergen in finished product
<b>5.</b>	<b>Determination of Action Levels</b>
5.1	Determination of Reference Amounts for Packaged Products & Bulk Product Calcs
5.2	Determination of the application of Reference Doses for Packaged Products
5.3	Establish Action Levels for each identified allergen in a Packaged Product
5.4	Validation of the VITAL risk assessment
<b>6.</b>	<b>Precautionary Allergen Labelling</b>
<b>7.</b>	<b>Verification of the VITAL risk assessment</b>
7.1	Verification procedures
7.2	Use of the VITAL mark



# Communication



## How will consumers know my product is VITAL Certified?

- Allergen Bureau website – directory of certified products
- VITAL Certificate from your Certification Body
- Optional use of VITAL Mark – back of pack
- Manufacturer website – register of certified products encouraged

### **INGREDIENTS**

Rolled **oats**, glucose syrup, **almond** meal, **peanut** pieces, honey, coconut.

**Contains gluten, tree nut, peanut**

**May be present: wheat**





# Applying for certification



Visit the Allergen Bureau [VITAL Standard webpage](#)

- Download, review and understand the VITAL Standard
- Be familiar with Certification Body (CB) requirements

Talk to your CB and, where possible:

- Use same CB as for your FSMS audit
- Combine VITAL Std audit with your FSMS audit

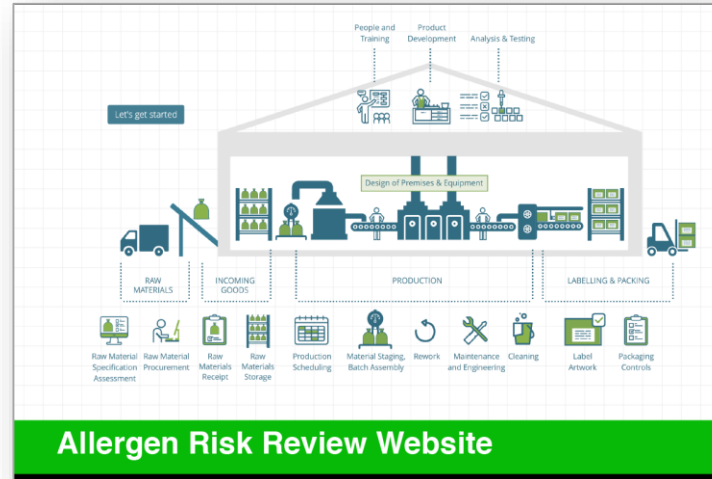
For additional assistance: please contact the Allergen Bureau



# Other Resources

Website: [allergenbureau.net](http://allergenbureau.net)

The screenshot shows the Allergen Bureau website homepage. At the top, there is a navigation menu with links for ABOUT US, FOOD ALLERGENS, RISK REVIEW, VITAL® PROGRAM, RESOURCES, NEWS, EVENTS, and FREE HELPLINE. The main content area features a large banner for "VITAL 3.0 & Allergen Management Guidance Breakfast Seminars" held in February and March 2020. Below this, there is a "LATEST NEWS" section with four articles: "Can exposure to house dust mite allergens through breastmilk lead to food allergy in infancy?", "2020 Food Safety, Risk and Compliance Conference, Auckland New Zealand - 10-11 March 2020", "VITAL 3.0 and Allergen Management Guidance Breakfast Seminars 2020 - Christchurch, Auckland and Brisbane", and "Exclusive breastfeeding may protect against milk allergy".



The cover of the "Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL®) Program Version 3.0" features the Allergen Bureau logo at the top left. Below the logo is the tagline "Informing the food industry". The title "Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL®) Program Version 3.0" is prominently displayed in a blue banner. Below the banner are three small images: a person working in a kitchen, a woman holding a jar, and hands holding oranges. At the bottom right, the date "October 2019" is shown.

The article page for "Food Allergen Analysis" includes the Allergen Bureau logo and navigation menu. The title "Food Allergen Analysis" is centered. The text explains that food allergen analysis is the testing of a material or a surface to identify and/or quantify the presence of a food allergen. It states that analytical test results are a useful tool for allergen management in food processing and can be used to enhance an allergen management plan. A list of uses for food allergen analysis is provided:

- establish allergen status of ingredients
- identify equipment that is difficult to clean
- inform the risk assessment
- confirm VITALB (Voluntary Incidental Trace Allergen Labelling Program) assumptions
- verify final product status in high risk environments
- monitor effect of critical changes

The article concludes by stating that allergen analysis has a place in finished product testing and verifying free from claims, but a single test result should not be considered in isolation and choosing the correct type of analysis and test can be complex.

The cover of the "2019 Food Industry Guide to Allergen Management and Labelling" features the Australian Food & Grocery Council and Allergen Bureau logos at the top. The background image shows a woman and a child in a grocery store aisle. The title "2019 Food Industry Guide to Allergen Management and Labelling" is prominently displayed in a blue banner. Below the banner, it says "For Australia and New Zealand". At the bottom, it notes "A partnership document of the Australian Food and Grocery Council and the Allergen Bureau".

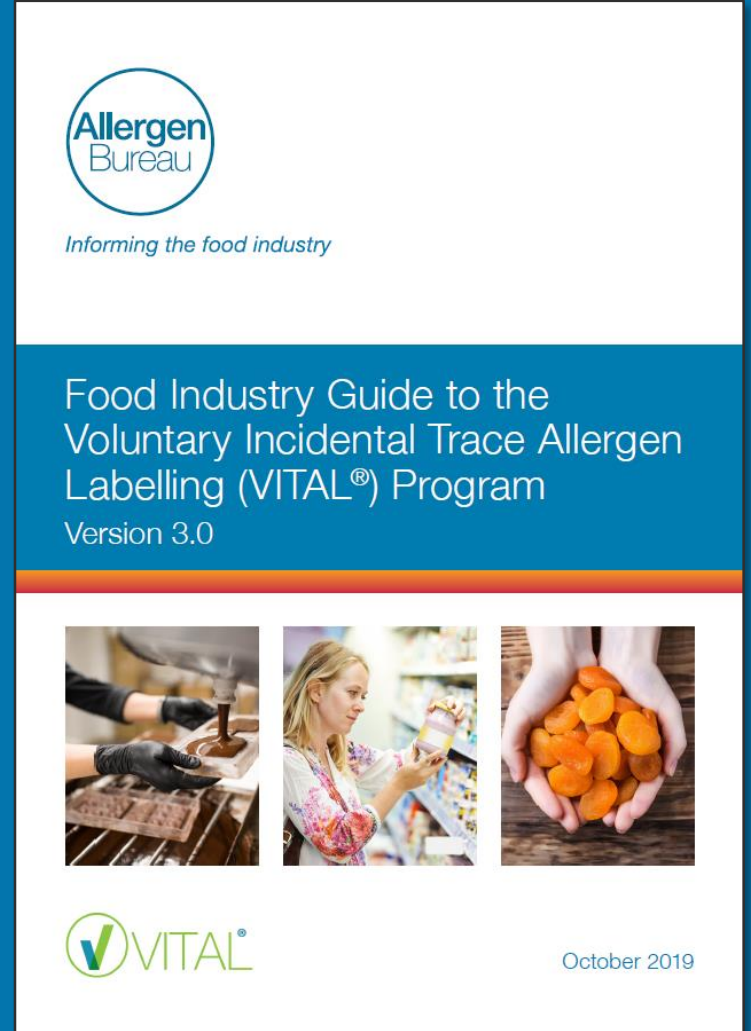
The cover of "Voluntary Incidental Trace Allergen Labelling" features the Allergen Bureau logo at the top right. The title "VOLUNTARY INCIDENTAL TRACE ALLERGEN LABELLING" is prominently displayed in a green banner. Below the banner, it says "The Allergen Bureau Ltd ACN 162 786 389". The background image shows a woman and a child in a grocery store aisle.



# The VITAL<sup>®</sup> Guide

## Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL<sup>®</sup>) Program

- Primary reference document for the implementation of the VITAL Program
- Updated from Version 2.0 to Version 3.0





# What's new to the VITAL Guide

- Aligns with new VITAL Standard
- Incorporates 2019 VSEP recommendations
- Directs to new VITAL resources
  - Allergen Risk Review website
  - VITAL Best Practice Labelling Guide
  - VITAL Standard
  - Allergen Risk Review Anomaly for dark chocolate

## 3. SUPPORTING INFORMATION

### 3.1 VITAL Online (including the interactive VITAL Action Level Grid)

VITAL Online is a user-friendly, web-based VITAL calculator. It was developed to assist with and record the implementation of the VITAL Program for food products. VITAL Online provides a useful format to store the allergen status of ingredients and processing profiles and to record the assumptions used for the VITAL risk assessment. VITAL Online includes the interactive VITAL Grid which can be used to create a VITAL Action Level Summary report.

VITAL Online is available at [www.vital.allergenbureau.net](http://www.vital.allergenbureau.net)

Please also see [www.allergenbureau.net/vital/vital-online](http://www.allergenbureau.net/vital/vital-online) for further information about VITAL Online, including "Helpful Hints".

### 3.2 Allergen Risk Review website

The Allergen Bureau's Allergen Risk Review website is a freely available interactive guide designed to assist the food industry with understanding the allergen status of its products. This resource was developed to assist food manufacturers to prepare for implementation of the VITAL Procedure. For example, the Allergen Risk Review website contains information about how to determine the allergen status of ingredients and how to quantify hang up. Access the Allergen Risk Review website at [www.allergenbureau.net/risk-review](http://www.allergenbureau.net/risk-review).

### 3.3 VITAL Best Practice Labelling Guide

The VITAL Best Practice Labelling Guide contains worked examples of the application of the VITAL Program to food products. It was developed by members of the food industry and intended to provide the food industry with guidance for declaring allergens on a label. This guide was developed for products sold in Australia and New Zealand, however, it contains information that may be useful for other jurisdictions. The VITAL Best Practice Labelling Guide is available at the Allergen Bureau website.

### 3.4 The VITAL Standard

The VITAL Program is available as the VITAL Standard, a supplementary certification program for food manufacturers that are already certified to GFSI recognised food safety management standards that include allergen management. The VITAL Standard is certified by Certification Bodies

accredited to ISO/IEC 17065:2012 (or subsequent version) and audited by auditors trained in the VITAL Standard and registered with The Allergen Bureau Ltd. Manufacturers that achieve VITAL certification may use the VITAL mark on the products within their scope of certification.

Further information about the VITAL Standard is available at the Allergen Bureau website.

### 3.5 VITAL Training

Training in the VITAL Program and VITAL Online is available from Allergen Bureau-endorsed Training Providers. The register of training providers, listed by country, is available at the Allergen Bureau website.

### 3.6 Allergen Risk Review Anomaly for Dark Chocolate

An allergen risk review anomaly, in relation to dark chocolate, and inconsistent labelling practices were identified by the confectionary industry. This occurs where dark chocolate is manufactured following production of milk chocolate, i.e. milk remains in the dark chocolate at variable levels, often above the VITAL Program Action Level 2 where precautionary allergen labelling would be recommended. This is also above the allergic consumer and their carers' expectation of 'trace' or 'minimal' (cow's) milk levels.

The Australian Industry Group (AI Group) Technical Committee established a working group with the Allergen Bureau and, in consultation with the Australian Food & Grocery Council (AFGC), worked together to consider industry guidance in relation to this allergen risk review anomaly and food labelling for the Australian and New Zealand food industry. This advice is available at the Allergen Bureau website.





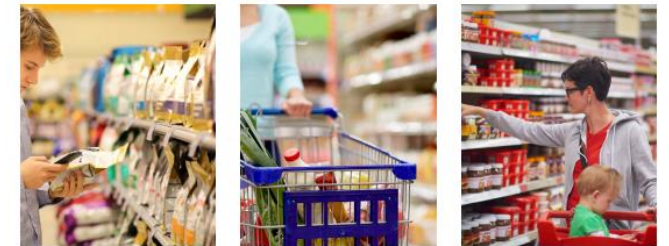
# 2019 VSEP Recommendations

- Released in October 2019
- Includes the changes from 2018 & 2019 meetings of the VSEP
- Methodology moved to model averaging (robust science is the key for all stakeholders)
- Reference Dose recommendations based on  $ED_{01}$  (1 in 100 allergic consumers reacting)



*Informing the food industry*

Summary of the 2019  
VITAL Scientific Expert Panel  
Recommendations







# Reference Doses

Allergen	No. of individuals	VITAL 2.0 Ref Dose (mg protein)	2019 VSEP Ref Dose (mg protein) [ED <sub>01</sub> ]	Change
Egg	431	0.03	0.2	↑
Hazelnut	411	0.1	0.1	✓
Lupin	25	4.0	2.6	↓
Milk	450	0.1	0.2	↑
Mustard	33	0.05	0.05	✓
Peanut	1306	0.2	0.2	✓
Sesame	40	0.2	0.1	↓
Shrimp	75	10.0	25	↑
Soy (milk + flour)	87	1.0 (soy flour)	0.5	↓
Wheat	99	1.0	0.7	↓
Cashew	245		0.05	+
Celery	82		0.05	+
Fish (finfish)	82		1.3	+
Walnut	74		0.03	+



## VITAL Action Level Grid Report

Substances	Reference Dose(mg)	Action Level (ppm) where reference amount/serving size is 100g	
		Action Level 1	Action Level 2
Cereals containing gluten (Total)	0.7	< 7 ppm	≥ 7 ppm
Barley	0.7	< 7 ppm	≥ 7 ppm
Oats	0.7	< 7 ppm	≥ 7 ppm
Rye	0.7	< 7 ppm	≥ 7 ppm
Spelt	0.7	< 7 ppm	≥ 7 ppm
Wheat	0.7	< 7 ppm	≥ 7 ppm
Crustacea	25	< 250 ppm	≥ 250 ppm
Egg	0.2	< 2 ppm	≥ 2 ppm
Fish	1.3	< 13 ppm	≥ 13 ppm
Milk	0.2	< 2 ppm	≥ 2 ppm
Peanut	0.2	< 2 ppm	≥ 2 ppm
Molluscs			
Sesame	0.1	< 1 ppm	≥ 1 ppm
Soy	0.5	< 5 ppm	≥ 5 ppm
Tree nuts (Cashews & Pistachios) (Total)	0.05	< 0.5 ppm	≥ 0.5 ppm
Cashews	0.05	< 0.5 ppm	≥ 0.5 ppm
Pistachio nuts	0.05	< 0.5 ppm	≥ 0.5 ppm
Tree nuts (Pecans & Walnuts) (Total)	0.03	< 0.3 ppm	≥ 0.3 ppm
Pecans	0.03	< 0.3 ppm	≥ 0.3 ppm
Walnuts	0.03	< 0.3 ppm	≥ 0.3 ppm
Tree nuts (Almonds, Brazil nuts, Hazelnuts, Macadamia nuts, Pine nuts) (Total)	0.1	< 1 ppm	≥ 1 ppm
Almonds	0.1	< 1 ppm	≥ 1 ppm
Brazil nuts	0.1	< 1 ppm	≥ 1 ppm
Hazelnuts	0.1	< 1 ppm	≥ 1 ppm
Macadamia nuts	0.1	< 1 ppm	≥ 1 ppm
Pine nuts	0.1	< 1 ppm	≥ 1 ppm
Lupin	2.6	< 26 ppm	≥ 26 ppm

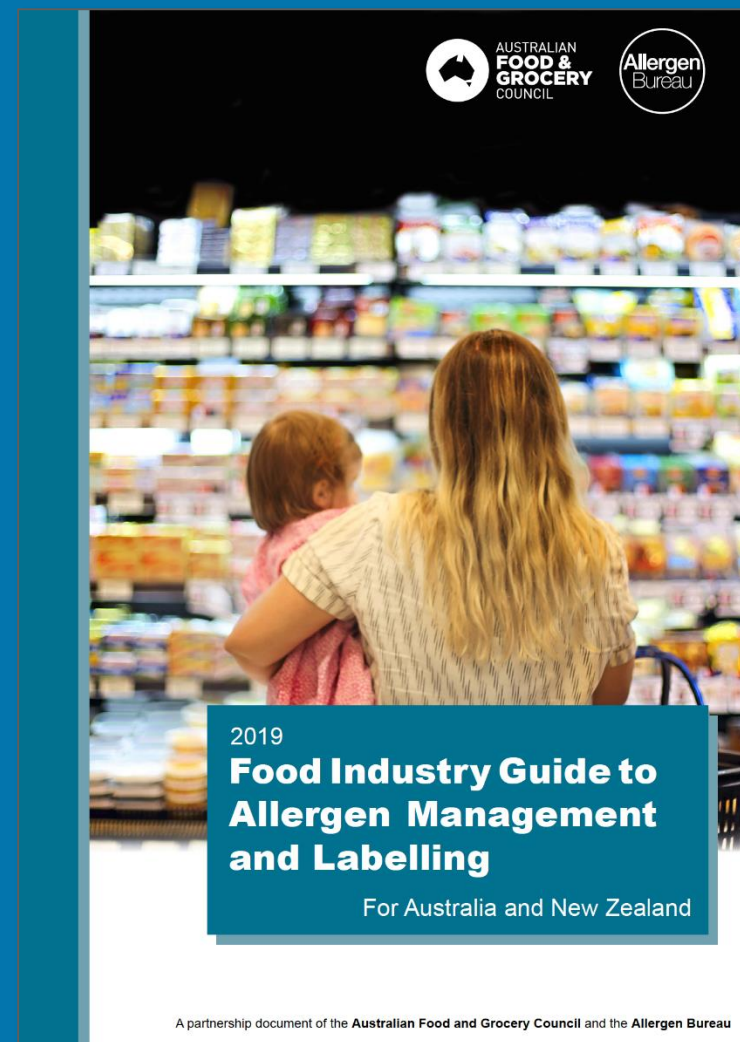


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GROCERY**  
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# FIGAML

## Food Industry Guide to Allergen Management and Labelling

- Industry best practice for the management of allergens, allergen labelling, and allergen communication.
- Primary reference document for allergen management and labelling in Australia and New Zealand
- Updated 2019





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# New to FIGAML

- 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](#)

## 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)<sup>12</sup> 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<sup>14</sup>). 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 mustard and celery) that cause allergies or intolerances in [Annex II of Regulation No1169/2011](#). Most foods listed as allergens in the regulations of other countries or markets are also present in this list.

Another example of international differences in allergen declaration requirements is [CODEX](#) (STAN 1-1985) which requires the declaration of eight allergens and sulphites but currently does not require the declaration of sesame seeds or lupin.

### Imported Foods

Foods that are imported into Australia and or New Zealand must comply with the Code, as set out in provisions in the Australian Commonwealth Imported Food Control Act 1992 and the NZ Food Act that relate to importation of food.

In addition to the Australian product liability laws mentioned previously, importers should take specific note of clause 8(1) of the *Imported Food Control Act 1992* which makes it a criminal offence to import food that the importer knows "poses a risk to human health". This term is explained further in section 3(2) but importantly, and unlike the Food Acts, it does NOT exclude allergies or sensitivities. It may well be a criminal offence, then, to (knowingly or recklessly) import a food containing an allergen unless that allergen is clearly identified and communicated to customers and consumers.

In New Zealand, the same requirements around allergens apply for imported food as they do with food made and or sold in New Zealand.

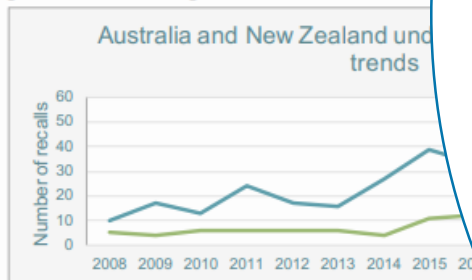


## 5. FOOD RECALLS

FSANZ describe a food recall as an action taken by a food business to remove unsafe food from distribution, sale and consumption<sup>17</sup>. A consumer level food recall involves the removal of unsafe or unsuitable food from all points in the production and distribution networks including any affected food in the possession of consumers. The public must be informed of a consumer level recall and this usually involves the use of media such as newspaper advertisements, point of sale notices and publication of information about the recall by FSANZ and/or MPI on their website and social media sites.

Australian food recall data is collected and collated by FSANZ to identify common trends and problems occurring across the food industry in Australia. In the last decade, most recalls (30% of all) have been conducted due to undeclared allergens (266 recalls in total). During this time, the most common allergen related recall was undeclared milk (30% of all allergen related recalls), the second being undeclared peanut (18% of all allergen related recalls).

Figure 4: Undeclared allergen recall trends



### Cost Impact of a Food Recall

Undertaking a food recall is a major commercial expense, with the additional cost of lost sales and brand damage. Costs incurred as a result of a food recall may be due to:

- potentially ceasing production
- loss of time when investigating the cause
- cost to recall the product from distribution and/or point of sale
- loss of sales
- disposal of the product
- disposal of incorrect stock
- communicating the recall
- loss of reputation with retailers
- restocking
- legal action.

Undeclared food allergen recalls have been steadily increasing over the last ten years in Australia and over the last five years in New Zealand.

The most common reasons for undeclared allergen recalls coordinated by FSANZ are:

- lack of skills and knowledge
- supplier verification issues
- packaging errors
- accidental cross-contamination
- finished product

The Ministry for Primary Industries (MPI) provides information on food recalls in New Zealand on their website. Further information is available on the MPI website.

# FIGAML 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 safety issue is identified. The food recall plan should include an allergen related communications plan with a designated, responsible person identified to provide information to customers, consumers, and regulatory authorities in a timely manner. The plan should include a list of allergen related stakeholder contact list.

Developing a Food Recall plan for your business is available on the [FSANZ website](#) and on the [MPI website](#).

### Industry Recall Protocol

The Industry Recall Protocol provides information on the crisis management process as an ANZ Product Recall industry-agreed withdrawal of products from 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.*



# VITAL Online

## the web-based

# VITAL Calculator

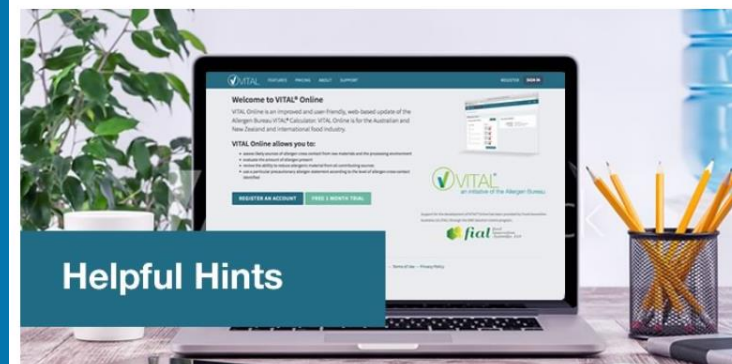
## UPDATED to Version 3.0

- Reference Doses
- Tree nut groupings
- New functionality
- NEW Reference Dose for celery (European Union legislation)



## VITAL Online Helpful Hint – ‘Update All’ Functionality

by Imcleod / November 20, 2019 / Training, VITAL / 0



The new 'Update All' functionality in VITAL Online allows the Account Owner to update all ingredients, processing profiles and recipes in one process – rather than updating each recipe individually. In VITAL Online, if any ingredient, processing profile or Reference Dose used in a recipe is changed, the recipe must be 'updated' in order to carry the changes across to affected recipe.

In addition to the ability to 'Update All' outstanding recipes, a Comparison Summary Report will be created to show any changes to labelling outcomes as a result of the update process. The 'Update All' functionality is especially useful where there are large changes – for example, an update to Reference Doses which affects all recipes (e.g. the recent change from VITAL 2.0 to VITAL 3.0).



# Tree nut groupings



## VITAL 2.0 PAL:

May be present: Tree nuts (Almond, Cashew)

Table 1: VITAL 2.0 Reference Doses for Tree nuts – example

Allergen	Reference Dose (mg)	Action Level (ppm) where Reference Dose is 80g		Readily dispersible cross contact amount (ppm)	Labelling Outcome
		Action Level 1	Action Level 2		
Tree nuts (total)	0.1	<1.25	≥1.25	1.4	Action Level 2
Almonds				0.7	
Brazil Nuts					
Cashews				0.7	
Hazelnuts					
Pecans					
Pine nuts					
Pistachios					
Walnuts					

## VITAL 3.0 PAL:

May be present: Tree nuts (Cashew)

Table 2: VITAL 3.0 Reference Doses for Tree nuts – example

Allergen	Reference Dose (mg)	Action Level (ppm) where Reference Dose is 80g		Readily dispersible cross contact amount (ppm)	Labelling Outcome
		Action Level 1	Action Level 2		
Tree nuts (other) (total)	0.1	<1.25	≥1.25	0.7	Action Level 1
Almonds				0.7	
Brazil Nuts					
Hazelnuts					
Pine nuts					
Walnuts					
Tree nuts (cashews & pistachios)(total)	0.05	<0.62	≥0.62	0.7	Action Level 2
Cashews				0.7	
Pistachio					
Tree nuts (walnuts and pecans)(total)	0.03	<0.38	≥0.03		
Walnuts					
Pecans					



# VITAL Online new functionality

To support users with the transition from VITAL Program V2.0 to V3.0

1. 'Update All'
2. Recipe Summary report for all recipes
3. Comparison Summary report for individual recipes



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# Allergen Risk Review website



[allergenbureau.net/risk-review](http://allergenbureau.net/risk-review)





# Is your product going to be the first VITAL<sup>®</sup> certified product?





# Allergen Bureau 2020 Awards for Best Practice Food Allergen Management

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Awards for Best Practice Food Allergen Management in Australia and New Zealand

**Allergen Bureau**  
2020  
New Zealand  
Best Practice  
Food Allergen  
Management  
*Awarded to*

**Allergen Bureau**  
2020  
Australian  
Best Practice  
Food Allergen  
Management  
*Awarded to*

**WIN return flights & 3 nights' accommodation to AIFST / NZIFST**

The image is a promotional graphic for the Allergen Bureau 2020 Awards. It features two blue award trophies on the left, each with the Allergen Bureau logo and text describing the award categories: "2020 New Zealand Best Practice Food Allergen Management" and "2020 Australian Best Practice Food Allergen Management". To the right, a large commercial airplane is shown flying over a sunset or sunrise. A green banner at the bottom right contains the text "WIN return flights & 3 nights' accommodation to AIFST / NZIFST". The background is a dark blue sky with a bright light source on the horizon.

<http://allergenbureau.net/allergen-bureau-2020-awards-for-best-practice-food-allergen-management-in-australia-and-new-zealand/>

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