



Allergen management and control: challenges facing SMEs in the Australian Food Industry

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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 80000 and 100000 (including approx 20000 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 – 46 (46% OF THE TOTAL RECALLS)

FIGURES AND FOLLOWING SLIDE - COURTESY OF THE FSANZ WEB SITE AS AT 9/05/19

Courtesy of FSANZ website May 2019

| | 2009 | 2010 | 2011 | 2012 | 2013 | 2014 | 2015 | 2016 | 2017 | 2018 | Total |
|-------------------------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|-----------|------------|------------|
| Undeclared allergen | 17 | 13 | 24 | 17 | 16 | 27 | 39 | 33 | 34 | 46 | 266 |
| Microbial contamination | 28 | 14 | 13 | 25 | 12 | 26 | 13 | 20 | 8 | 20 | 179 |
| Foreign matter | 7 | 10 | 18 | 12 | 7 | 14 | 8 | 7 | 10 | 15 | 108 |
| Biotoxin | 1 | 2 | 4 | 1 | 2 | 3 | 15 | 6 | 4 | 2 | 40 |
| Chemical/contaminant | 1 | 10 | 5 | 1 | 0 | 1 | 0 | 1 | 1 | 2 | 22 |
| Labelling | 1 | 1 | 1 | 2 | 2 | 0 | 2 | 2 | 2 | 6 | 19 |
| Other | 0 | 3 | 2 | 2 | 3 | 5 | 4 | 3 | 10 | 8 | 40 |
| Tampering | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 0 | 1 | 1 |
| Total | 55 | 53 | 67 | 60 | 42 | 76 | 81 | 72 | 69 | 100 | 675 |



ROOT CAUSE OF ALLERGEN RECALLS (Source FSANZ)

- 1. Lack of skills and knowledge of labelling requirements, for example:
 - pasta was declared as an ingredient, but wheat was not
 - manufacturer reformulated ingredients – however did not reflect new ingredients on labelling
 - the ingredients were not fully-translated into English from the original language
- 2. Supplier verification issues, for example:
 - raw ingredient contained allergen but this information was not passed on to the manufacturer
- 3. Packaging errors, for example:
 - product packed in the wrong packaging
 - dairy free claim on front of packet when it was meant to be a gluten free claim - ingredient list was correct
- 4. Accidental cross contamination either of a raw ingredient, or during final production process.
- These problems were identified via consumer complaints, distributor or retailer complaints, company and government testing and/or in-house testing. The corrective actions taken by food businesses included education and training for staff, amended processes and procedures and product labels.



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
- INPLANT 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



CONCLUSIONS



After the extensive work undertaken by the FTAA sub committee and after the launch of the Allergen Bureau Risk review Website all work was put on hold.

We believe this Website is an excellent tool and we will initiate discussions on how it can be implemented as a training tool for SME's

WELL DONE ALLERGEN BUREAU



FINAL COMMENT



THANK
YOU

