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Allergen Risks –

A thorough investigation of allergen status of food throughout the manufacturing process

Thurs 21 Mar, 2019

Food Safety & Compliance Conference, Auckland

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Director, Allergen Bureau

(GM – Operations & Quality ANZ, Hawkins Watts)



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AGENDA

- Allergen Risk Review - Where do I start?
- Introducing the Allergen Bureau's Risk Review website
- Using allergen risk review to inform your VITAL risk assessment



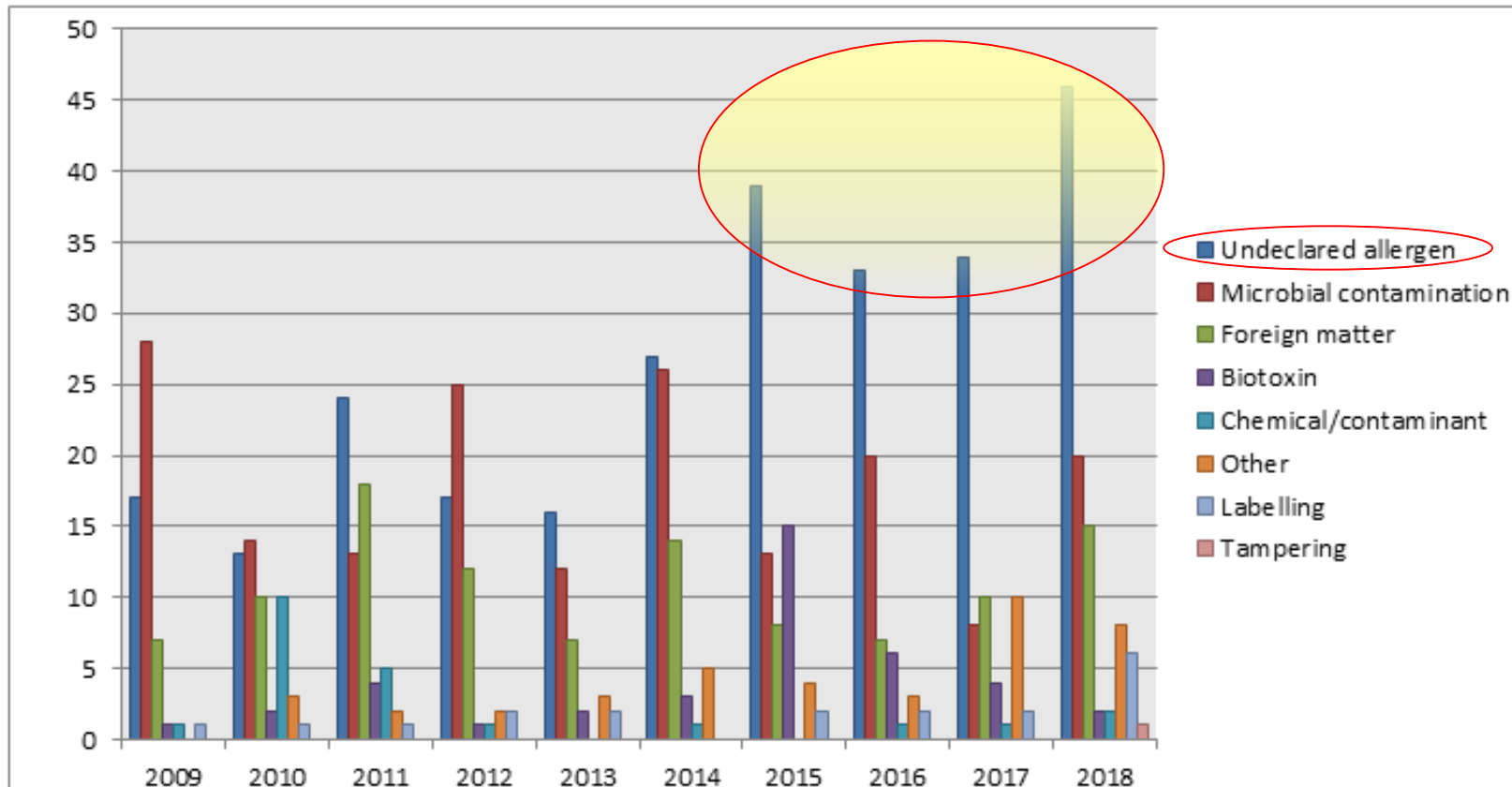
Allergen Risk Review – Where do I start?

- GFSI StdS – BRC, FSSC 22000, SQF
- Codex – Revision of General Principles of Food Hygiene will include Allergens & New work on Code of Practice on Food Allergen Management
- FSANZ Food StdS Code – Std 1.2.3
- Retail requirements e.g. Coles, Woolworths, Aldi
- AFGC Allergen Management & Labelling Guide
- Gluten Free Certification Program (ACG/BRC)
- **VITAL[®] and the Allergen Bureau**



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>

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

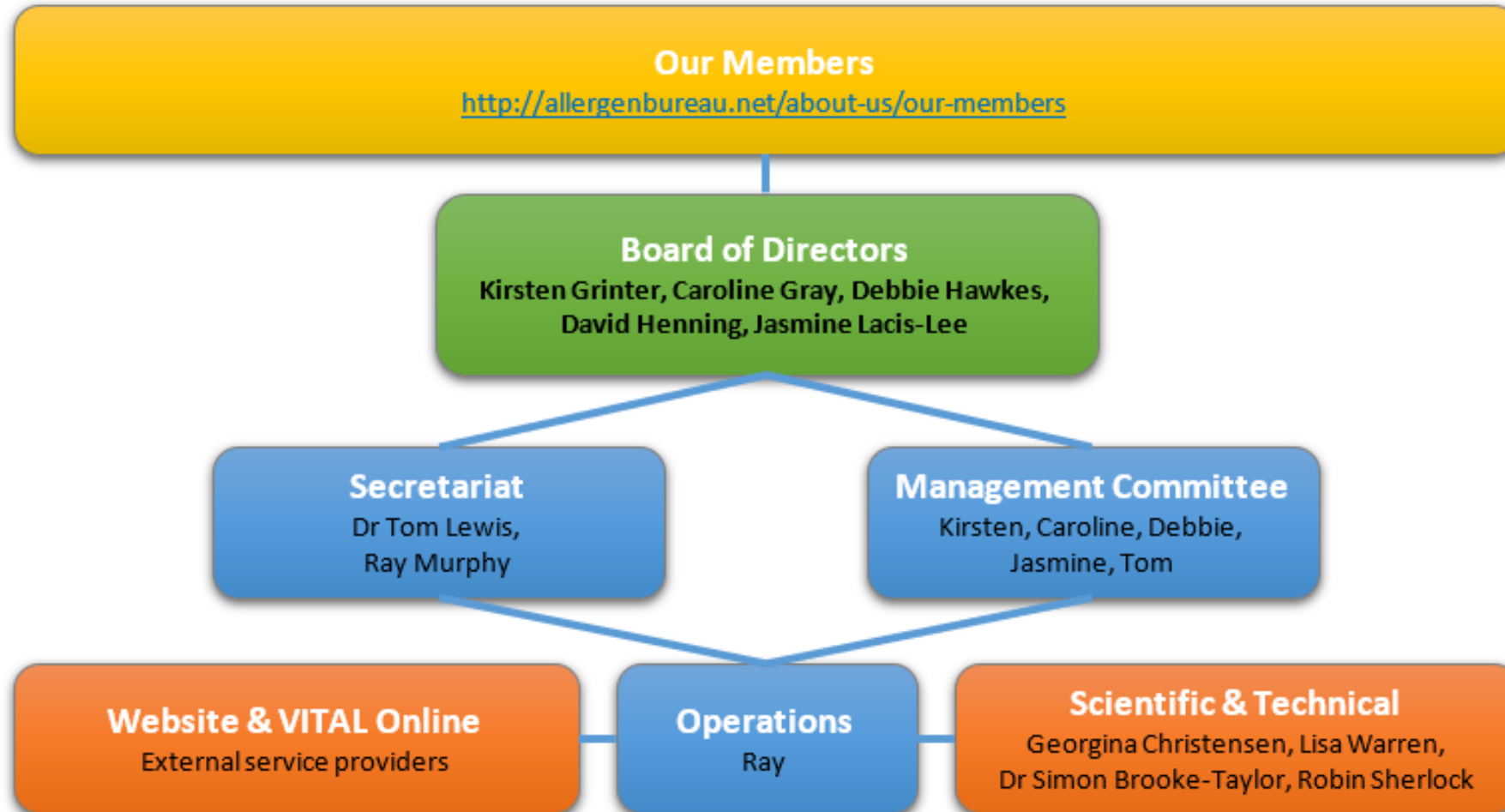
The Allergen Bureau is a globally recognised and supported industry organisation promoting best practice food industry allergen management, risk review and consistent labelling to facilitate informed consumer choice

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



The VITAL[®] Program

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

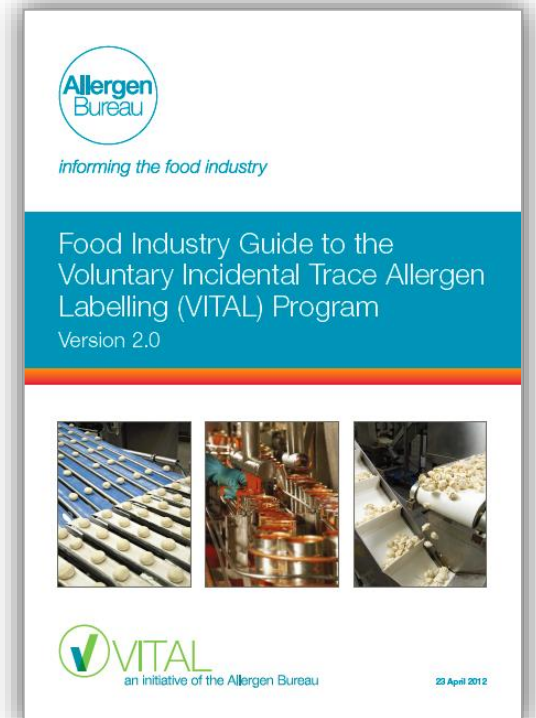
- ✓ Science-based labelling outcomes
- ✓ Suitable for raw materials & finished product
- ✓ VITAL Online – web-based, VITAL Calculator
- ✓ Supported by regulators



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

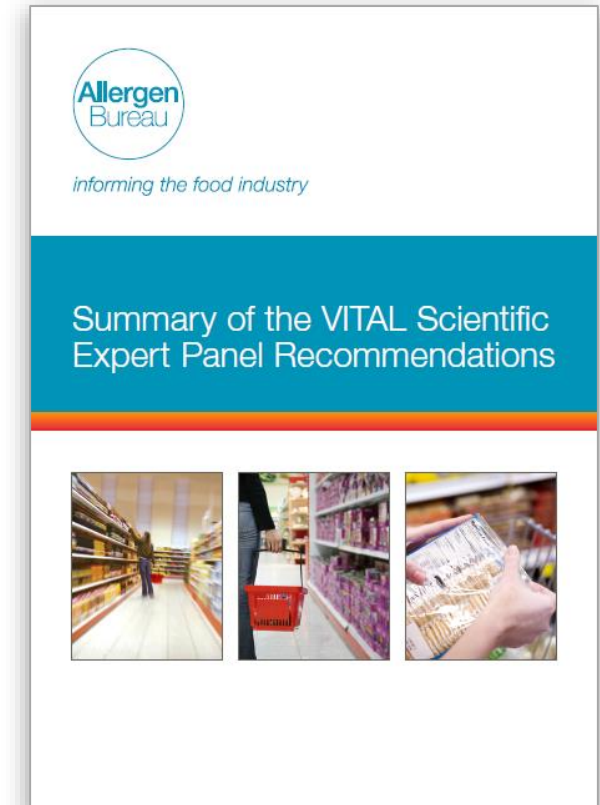


**Consider VITAL as a systematic allergen risk assessment tool.
It is not just about cross contact!**

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

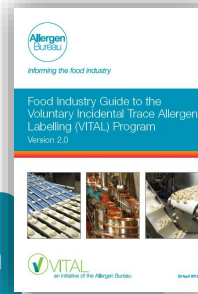
**Last VSEP meeting held on 16 Oct 2018,
EAACI-FAAM Copenhagen**





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VITAL Program



Tools & Helpline



VSEP



Training Providers

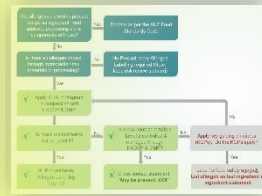


VITAL Online

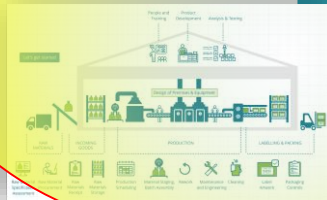


The VITAL® Framework

Risk Review Anomalies



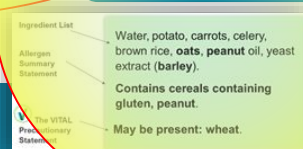
(WG1) Risk Review



(WG3) Certification



(WG2) Communication





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VITAL[®] Working Group 1 – Risk Review

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)



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an initiative of the Allergen Bureau

WG1 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!**



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an initiative of the Allergen Bureau

Allergen Risk Review website

Allergen Bureau informing the food industry

<http://allergembureau.net/risk-review/>

ABOUT US FOOD ALLERGENS **RISK REVIEW** VITAL® PROGRAM RESOURCES NEWS EVENTS FREE HELPLINE

Allergen Risk Review

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.

In the VITAL® Program, allergen risk review represents the holistic approach to assessing the allergen status of a food. It encompasses any systems, allergen management processes or evaluations made in order to make a labelling decision.

GO TO ALLERGEN RISK REVIEW WEBSITE NOW

Allergen risk review is the process of thoroughly investigating the allergen status of food. It begins with raw materials and continues throughout the manufacturing process until the food is packed and labelled. The risk review involves:-

- identifying the presence of allergens that are intentionally included as part of a recipe,
- identifying the risk of allergens that may be present due to unintentional cross contact,
- implementing strategies to control, reduce or eliminate allergens during manufacture, and
- quantifying cross contact allergens

INDUSTRY NEWS

RECENT POSTS

NOW LIVE

Allergen Risk Review website aims to improve food labelling and consumer safety

Nearly 20% of US adults think they are food allergic but only half are

Dietary avoidance during pregnancy



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Allergen Risk Review website

Work your way through the interactive factory map, by clicking on each icon to learn about the allergen risks and discover ways to address these challenges

We want your feedback!

The Allergen Risk Review website is a 'living' resource and will be regularly updated by the Allergen Bureau based on user feedback. Please share your experience of using the Allergen Risk Review website with us and any suggestions for improvement –

Contact Us at **email** info@allergenbureau.net or

Phone +61 437 918 959



Food Allergen Analysis Page

Understanding the choices and the limitations of analysis can assist food producers to develop a robust analysis program to support their allergen management plan.

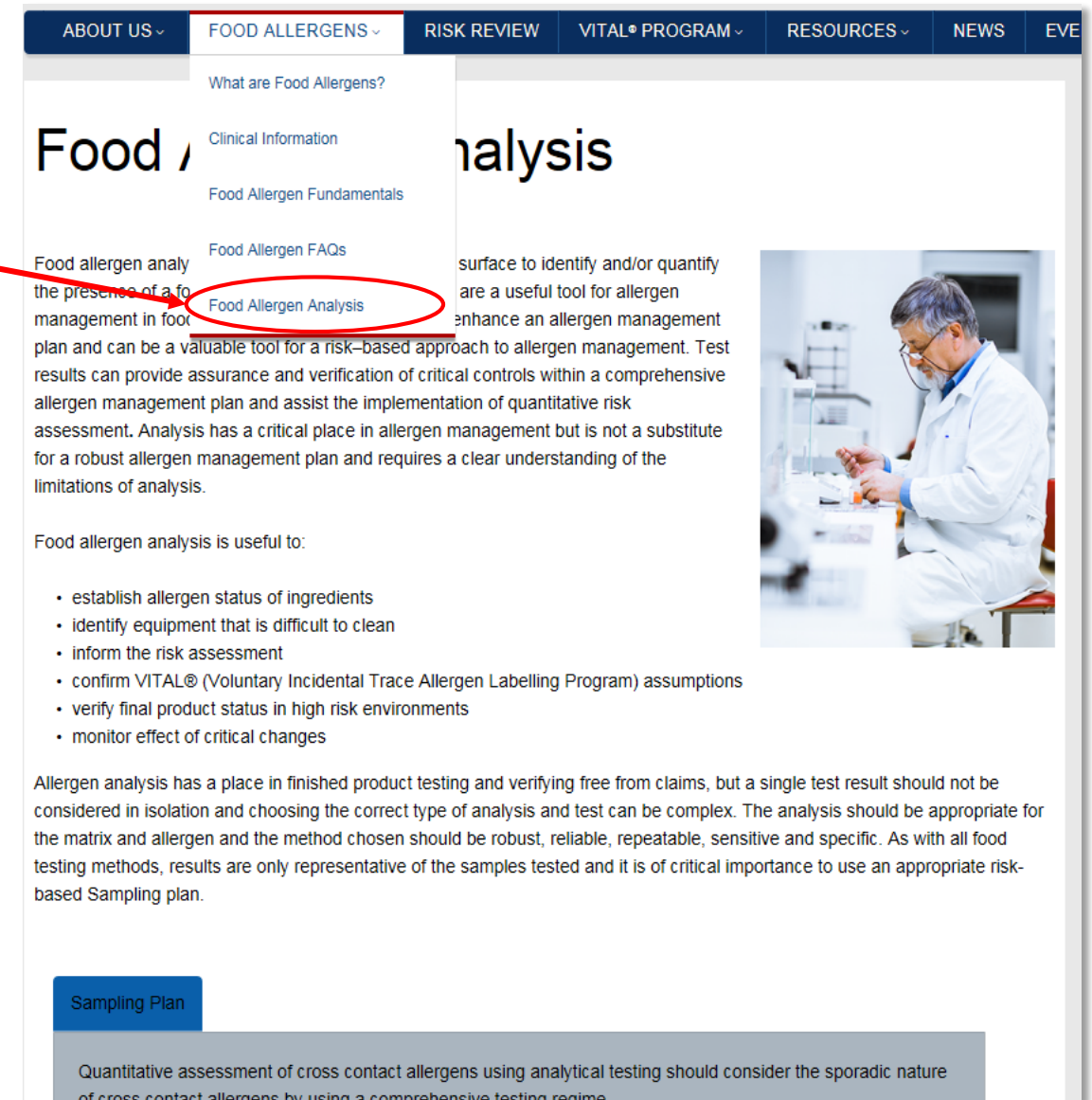
Check out this new page on our website.

<http://allergenbureau.net/food-allergens/food-allergen-analysis/>

Useful tips about Sampling plans,
how to choose the right method,
test kits, and what to ask the laboratory.

On site tests: ATP, Protein Swabs, Lateral Flow

Lab tests: ELISA, LC-MS, PCR



ABOUT US ▾ FOOD ALLERGENS ▾ RISK REVIEW VITAL® PROGRAM ▾ RESOURCES ▾ NEWS EVE

What are Food Allergens?
Clinical Information
Food Allergen Fundamentals
Food Allergen FAQs
Food Allergen Analysis

Food Allergen Analysis

Food allergen analysis is a valuable tool for a risk-based approach to allergen management. Test results can provide assurance and verification of critical controls within a comprehensive allergen management plan and assist the implementation of quantitative risk assessment. Analysis has a critical place in allergen management but is not a substitute for a robust allergen management plan and requires a clear understanding of the limitations of analysis.

Food allergen analysis is useful to:

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

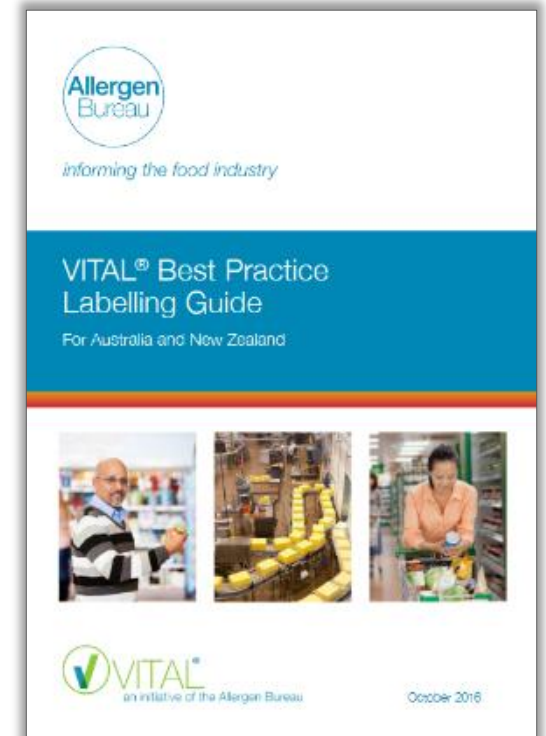
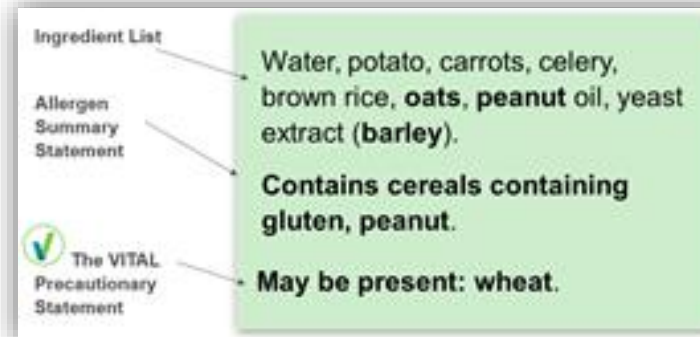
Allergen analysis has a place in finished product testing and verifying free from claims, but a single test result should not be considered in isolation and choosing the correct type of analysis and test can be complex. The analysis should be appropriate for the matrix and allergen and the method chosen should be robust, reliable, repeatable, sensitive and specific. As with all food testing methods, results are only representative of the samples tested and it is of critical importance to use an appropriate risk-based Sampling plan.

Sampling Plan

Quantitative assessment of cross contact allergens using analytical testing should consider the sporadic nature of cross contact allergens by using a comprehensive testing regime.

VITAL[®] Working Group 2 – 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



Available for download from the
Allergen Bureau >Vital Program tab <http://allergenbureau.net/vital/>

VITAL[®] Working Group 3 – Certification

- ✓ 'VITAL Scheme' under ISO 17065 has been drafted.
(thanks Bill McBride!)
- ✓ 'Bolt-on' to GFSI-recognised Stds + HACCP-based Allergen Mgmt Programs
- ✓ Draft VITAL Standard is currently being trialled by a few companies to ensure it can be interpreted & applied consistently
- ✓ Work in progress to determine resources for the Allergen Bureau to manage the VITAL standard and provide required support for certification bodies.
- ✓ JAS-ANZ accreditation of VITAL Scheme to be determined in future to avoid further delay in launching standard.



Working Group – Risk Review Anomalies

- AB & Ai Group, and in consultation with AFGC have been working together on this.
- An anomaly occurs where dark chocolate is manufactured after milk chocolate, and milk remains in the dark chocolate at variable levels, often above the VITAL Action Level. So not formulated as an ingredient, but inappropriate to label as “May be present”.
- FSANZ is silent on allergen cross contact...
- Consultation completed with consumer groups (Allergy & Anaphylaxis Australia, Allergy NZ) & regulators (NSW FA, FSANZ), to find a jurisdiction consensus on best practise.
- The working group has developed 3 key guiding principles and a decision tree to define when this scenario is applied.
- When valid, then the recommendation is to **include milk as the last ingredient** on the ingredient list of the dark chocolate.
- Hope to publish this guidance within 2 weeks



Working Group – Agricultural Cross contact

Background:

Significant recent evidence of allergen cross contact, due to standard agricultural practises during growing, harvesting, storing, field preparation, transport and packaging.

Difficult to identify the severity of cross contact, and how to ensure consistent and reliable data is captured to be able to make informed choices.

Working Group :

Lead by Jasmine Lacis-Lee, DTS and Joanne Price, H J Langdon and a number of other interested Food Industry companies.

Current status:

The Allergen Bureau has agreed to support this valuable project. Project Brief being drafted to define the objectives, outputs and success criteria.



FAMS 2019

3rd Food Allergen Management Symposium

Navigate the science, manage the risk

Keynote Speakers

- ✓ Professor Katie Allen, Murdoch Children's Research Institute, Australia
- ✓ Joseph Baumert, Food Allergy Research & Resource Program, University of Nebraska, USA (*TBC*)
- ✓ René Crevel, Rene Crevel Consulting Ltd, UK (*TBC*)
- ✓ Samuel Godefroy, Université Laval, Québec, Canada
- ✓ Jonathon Hourihane, University College Cork, Ireland
- ✓ Lauren Kolstad, Food Standards Australia New Zealand
- ✓ Professor Clare Mills, The University of Manchester, UK
- ✓ Ben Remington, Netherlands Organisation for Applied Scientific Research
- ✓ Maria Said, Allergy & Anaphylaxis Australia, Australia
- ✓ Penny Jorgensen, Allergy New Zealand, NZ
- ✓ Professor Steve Taylor, Food Allergy Research & Resource Program, University of Nebraska, USA
- ✓ Sandra Vale, National Allergy Strategy, Australia

13-16 May 2019, Melbourne

<http://www.fams2019.com.au/>



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
- ✓ International acceptance of Reference Dose (Threshold) concept
Growing acceptance of the concept and continued science to support the approach
- ✓ Alignment and collaboration with multiple other guidance sources
FSANZ Allergen Collaboration AFGC Allergen Mgmt & Labelling Guide
FTAA Allergen Protocols Codex Committees : Food Labelling, Allergen Mgmt Code of Practice
- ✓ How does the Allergic consumer identify the products which have gone through a rigorous VITAL® / Allergen risk assessment?





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Success story...

- Membership continuing to grow, with over 100 food industry organisations and individuals
 - ✓ International memberships & interest increasing – Sth America, Europe
- Technical support helpline for Allergen Management and VITAL® enquiries
- Excellent free resources available via website, monthly eNews, Risk Review Website, new Food Allergen Analysis page and more..
- VITAL® Online continuing to increase in usage:
 - ✓ 2,220 registered organisations, equating to over 3,800 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 15,500 VITAL reports, with over 10,000 ingredients, and 8,000 recipes.
 - ✓ 18 endorsed VITAL® Training Providers across the world
- NZIFST and AIFST Best Practice in Food Allergen Management Awards
 - ✓ NZ: Donna & Mike Elston, Talley's Ice Cream
 - ✓ AU: Sue Wilkinson, Robern Menz



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





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Acknowledgements and Contact Details

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

