



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



parera

Food Risk Analysis and Regulatory
Excellence Platform

Food Allergen Management

- A Global Overview -

2019 Food Allergen Management Symposium

Prof. Samuel Godefroy, Ph.D.

Full Professor, Food Risk Analysis and Regulatory Policies

Food Risk Analysis and Regulatory Excellence Platform (PARERA), Department of Food Sciences, Institute of Nutrition & Functional Foods (INAF)

Université Laval, Québec, QC, Canada

Outline



Current Status Of Allergen Standards At The International Level – Highlighting What Was Accomplished

Levers of Change ...

Recent Changes aiming for Enhanced International Guidance And Convergence In Food Allergen Management



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Food Risk Analysis and Regulatory
Excellence Platform

Positioning the Challenge Globally

- ❑ Food Allergen-related Incidents Contribute To The Burden Of Food-related Incidents
 - Food Allergies Are A Public Health Issue
- ❑ Food Allergy Incidents Are Preventable
 - Avoidance Continue To Be The Most Effective Risk Management Approach For Food Allergic Consumers
- ❑ Food Allergen Related Recalls Continue To Top The List Of Recalls In North America, South-west Pacific And Europe



Possible Increased Impact

Increased Emergency Room Visits related to Anaphylaxis in Montreal



THE JOURNAL OF Allergy AND Clinical Immunology

Articles & Issues ▾ Collections ▾ Multimedia ▾ Online CME News & Blogs ▾ For Authors ▾ About JAC

All Content [Advanced Search](#)

< Previous Article [Articles in Press](#) Next Article >

To read this article in full, please review your options for gaining access at the bottom of the page.

Article in Press

Increasing visits for anaphylaxis and the benefits of early epinephrine administration: A 4-year study at a pediatric emergency department in Montreal, Canada

[Elana Hochstadter](#), MD, [Ann Clarke](#), MD, MSc, [Sarah De Schryver](#), MD, [Sebastien LaVieille](#), MD, MSc, [Reza Alizadehfar](#), MD, [Lawrence Joseph](#), PhD, [Harley Eisman](#), MD, [Moshe Ben-Shoshan](#), MD, MSc

Altmetric 56

DOI: <http://dx.doi.org/10.1016/j.jaci.2016.02.016>





UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Interventions

- ☐ No cure possible to date for food allergy conditions
- ☐ Avoidance of the Food where the Allergenic Ingredient is Present, remains the main risk management strategy
- ☐ Labelling of Prepackaged Foods and Accurate Information on menus remains the cornerstone of regulatory interventions guided by Codex...



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences

International Standards Related To Food Allergens



CODEX 50 
ALIMENTARIUS 1963-2013

Codex Connection With Food Allergens

- ☐ Allergens: Food Labelling – CCFL
- ☐ Gluten And Celiac Disease: Nutrition And Foods For Special Dietary Uses – CCNFSDU
- ☐ Methods – CCMAS



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Paraphrasing the Codex Standard

*The **Presence** Of Priority (Allergenic) Food Should
ALWAYS Be Subject To **Declaration In**
The List Of Ingredients On A Food Label*



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Codex List Of Priority Allergens

- ❑ Codex Developed A List Of Foods And Ingredients That Are Known To Cause Hypersensitivity And Should Always Be Declared:
 - Cereals Containing Gluten i.e. Wheat, Rye, Barley, Oats, Spelt Or Their Hybridized Strains And Products Of These
 - Crustacea And Products Of These
 - Egg And Egg Products
 - Fish And Fish Products
 - Peanuts, Soybeans, And Products Of These
 - Milk And Milk Products (Lactose Included)
 - Tree Nuts And Nut Products
 - Sulfites In Concentrations Of 10 Mg/Kg Or More
- ❑ This List Was Adopted As A Final Text By The Codex Alimentarius Commission (CAC) In June 1999, With The Understanding That Future Additions And/Or Deletions From The List Will Be Considered By The CCFL Taking Into Account Advice Received From JECFA



<http://www.fao.org/docrep/meeting/X2670e.htm>

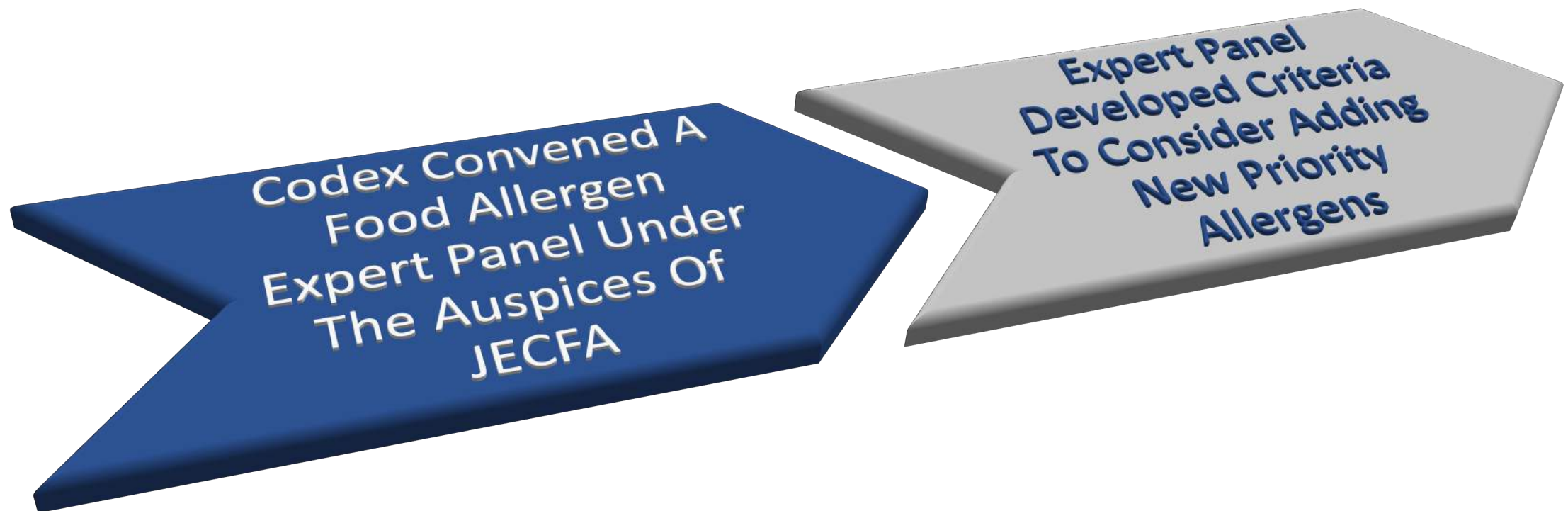


UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences

Regional / National Requirements

The Codex List Is Meant To Be Built Upon When
Considering Regional / National Requirements



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Changes Witnessed Over the Last 2 Decades

- ❑ Food Allergen Labeling requirements became a reality and are implemented
- ❑ New measures of preventive controls targeting allergens as a “food hazard” are being considered
 - New tools are being designed and implemented
- ❑ Enhanced industry awareness of allergen related issues



But... ..

Limited Guidance on

- ❑ Management of Cross-Contamination and non-deliberate presence of allergens
- ❑ How should regulators and industry address risks associated with such occurrences ?
- ❑ Guidance on the Adequate use of “Precautionary Statements”



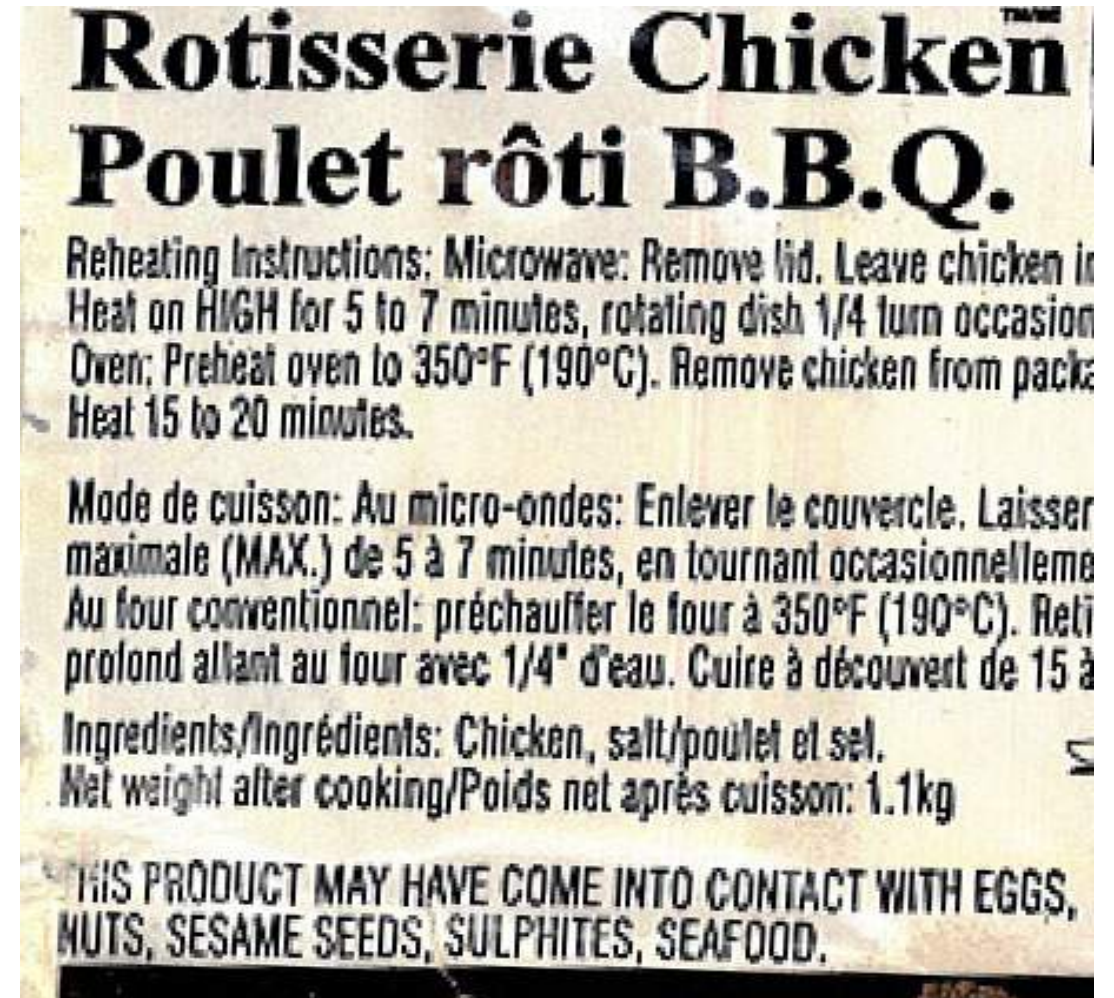
UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Precautionary Statements ... Lost their Effectiveness

- ☐ Proliferation Of Statements Has Trivialized Their Meaning
- ☐ Reduced Trust In Food Labels
- ☐ Added Number Of Incidents Related To “Risky” Behaviours
- ☐ Confusion Amongst Consumers And The Clinical Community



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



In 2015 ... Called on Codex to Reopen Allergen File

13



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



WHY?

❑ Identifying Food Allergen Management On Codex Priorities Is Needed:

- To Support Enhanced Protection Of Allergic Consumers **Internationally**
- To Level the Playing Field Amongst **Food Regulators**
- To Support A More **Predictable Environment For Industry**



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



CCFH... Responded

❑ Australia and the UK led an Electronic WG that developed a “Code of Practice on Food Allergen Management for Food Business Operators”

- The proposed draft was moved for consideration at step 5 at the upcoming Codex Alimentarius Commission
- CCFH called for an expert consultation to be held by FAO /WHO and address some question such as :
 - Thresholds for food allergens “below which the majority of allergic consumers would not suffer an adverse reaction”

PROPOSED DRAFT CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS (Agenda item 7)⁹

48. Australia, co-Chair of the EWG, introduced the item, explained the draft guidance and noted that, based on the comments submitted, the main issues to be addressed related to thresholds for allergens, risk assessment methodologies, and the use of the term ‘precautionary allergen labelling’. The co-Chairs had prepared a revised proposal (CRD4) based on all written comments and proposed to use this as a basis for discussion.

Discussion

49. The Committee agreed with most of the revisions in CRD4, and in addition made editorial corrections, amendments for flexibility, clarity and consistency within the Code (e.g., clarification, addition or deletion of examples; inclusion of transporters in the list of FBOs for completeness; including reference to re-packaging as well as re-labelling) and made the following comments and decisions.

50. The Committee noted that allergen management measures could prevent as well as minimize allergens and agreed to use both terms throughout the text.

51. As information on risk of allergen cross-contact may not be available, the Committee agreed to replace ‘risk’ with ‘likelihood’ where appropriate.

52. The Committee also included reference to undeclared as well as unintended allergens in food in the hazard characterization section in recognition that both situations were possible; clarified in Section 5.2.1.4 that the review of suppliers extended to suppliers’ operations and suppliers of processing aids; deleted reference to recognizing and responding to customer allergic reactions under Section 5.6, noting that although very important it was not part of allergen management; and added “and Resolution” to the title of Section 5.8.1 “Consumer complaints” to demonstrate that action needed to be taken.

List of foods that can cause allergic reactions (Para. 9 of CRD4)

53. Responding to the requests for clarification on the list of foods that can cause allergic reactions, the co-Chair of the EWG noted that while the list in the draft was related to allergic reactions and the list in the General Standard for Labelling of Pre-packed Foods (CXS 1-1985) was related to hypersensitivity, the two lists had been aligned as much as possible. In addition, a footnote had been added to clarify the inclusion of oats, given that this cereal does not contain gluten but that oats are commonly produced in the same location as gluten-containing cereals, resulting in cross-contact. The Committee agreed to put para. 9 in square brackets and send the list, with this modification, to CCFL for their advice.

Precautionary allergen labelling (Paras. 14, 28, 72, 152, 160, 161 of CRD4)

54. Recognizing that there may be situations in which the use of a precautionary allergen statement may be warranted, the Committee noted that such labelling should not replace the implementation of measures to prevent or minimize the presence of allergens. In this context, the co-Chair of the EWG informed the Committee



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Food Risk Analysis and Regulatory
Excellence Platform

CCFL Followed Suit

❑ **Discussion Paper on Allergen Labelling** – prepared by Australia, the US and the UK

- Calls for new work to ... develop guidance on precautionary allergen or advisory labelling.
- Calls for a joint FAO/WHO expert Consultation...
- Joining forces with CCFL.



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



The marvels of Technology

Offers new Perspectives for Enhanced Traceability to Consumers

- ❑ Documentation of Food Production Processes
(through Blockchain technology or other IT enabled approach will enable to document the life cycle of the product, up to the consumer)...
- Ability to trace the product forward in a most efficient and effective way
- **Most effective recall of products**



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Technology... Direct and Personalized Information...

New Purchasing Practice & Labeling Tools

❑ Reliance on e-Labels

- **Personalized** “Reading” of Labeling Information
 - Information on food products are comprehensive yet for a given consumer, only the important details are showcased
- Products to be avoided are clearly identified through “bar code reading” or other technology enabled tool

❑ e-Commerce

- Allows access to a section of food products that are adapted to a given health profile



Momentum is Back...

Everyone's input will be needed



Common priorities

Maximum impact of actions

Highest return on investments



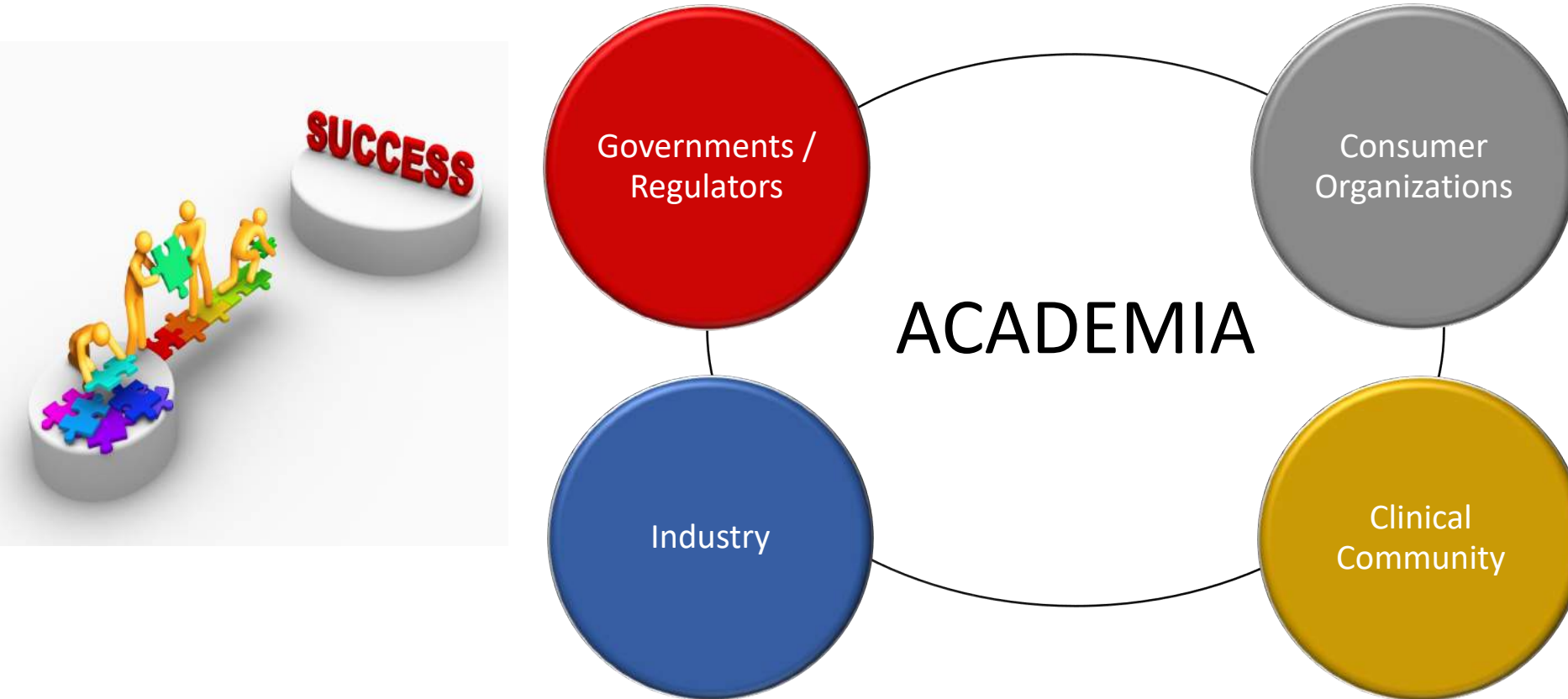
UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Conditions of Success

Maximum Engagement and Buy-in



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences



Expected Outcomes

- ❑ Safe(r) Allergic Consumers with Limited Incidents.
- ❑ No Fatal Food Allergy Incidents Ever.
- ❑ Trusting Consumers – With More Accessible Food Choices.
- ❑ Clear and Predictable Food Regulatory Environment for Industry:
 - With Accessible and Effective Food Allergen Management Tools.



UNIVERSITÉ
LAVAL

Faculty of Agriculture
and Food Sciences





parera

Food Risk Analysis and Regulatory
Excellence Platform

[illegible]