



informing the food industry

Improving Food Choices for Consumers with Food Allergy

Lessons from the Allergen Bureau Collaborative/Cooperative/Pre-Competitive Approach

Kirsten Grinter

Allergen Bureau President

Regulatory, Scientific Affairs and Nutrition Manager Nestle Australia

October 2018



informing the food industry

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





informing the food industry

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

Our Members

<http://allergenbureau.net/about-us/our-members>

Board of Directors

Kirsten Grinter • Caroline Gray • Debbie Hawkes
David Henning • Karen Robinson

Secretariat

Dr Tom Lewis
Ray Murphy

Management Committee

Kirsten • Caroline • Debbie
Tom

Website & VITAL Online

External service providers

Operations

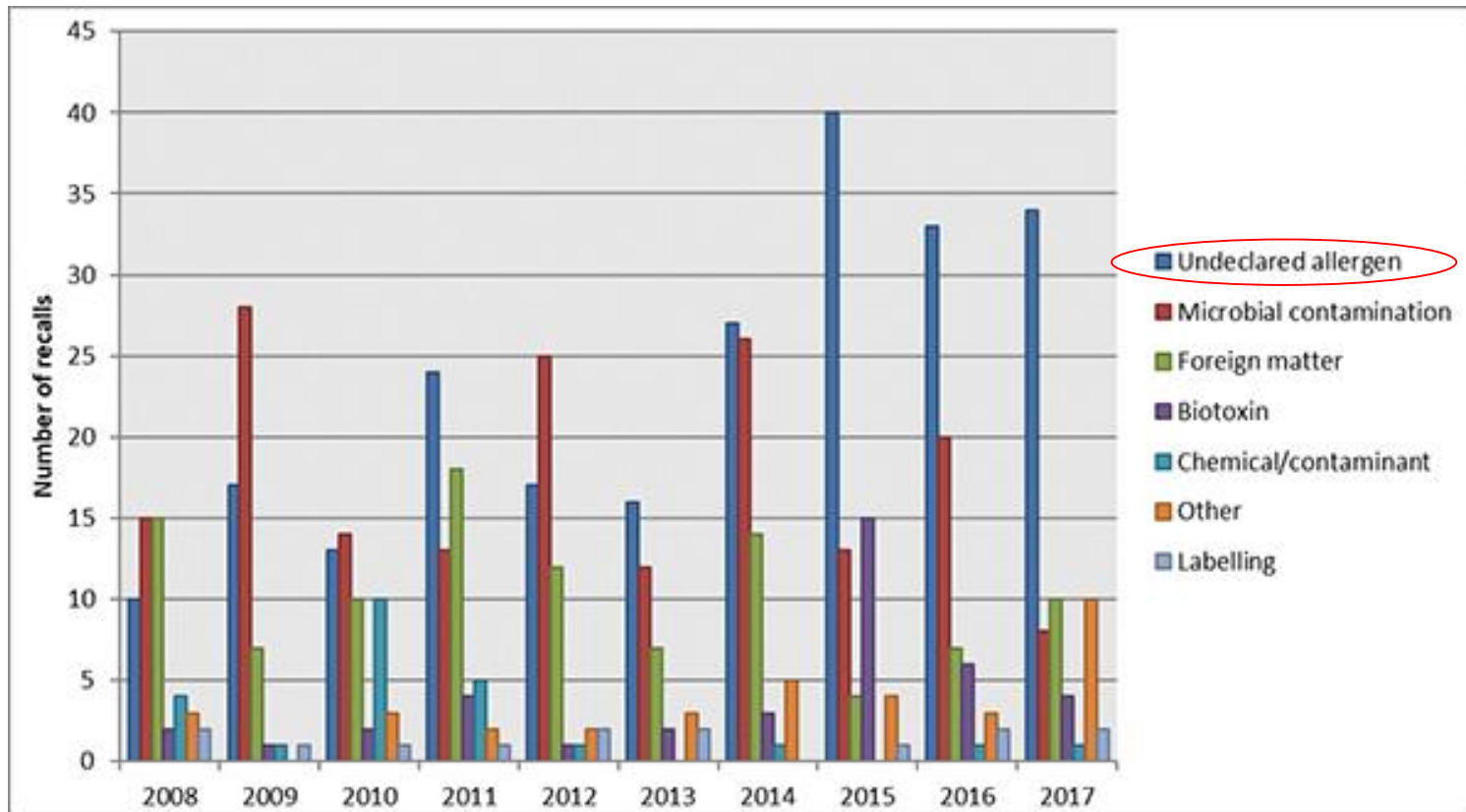
Ray

Scientific & Technical

Georgina Christensen • Lisa Warren
Dr Simon Brooke-Taylor • Robin Sherlock

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>

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

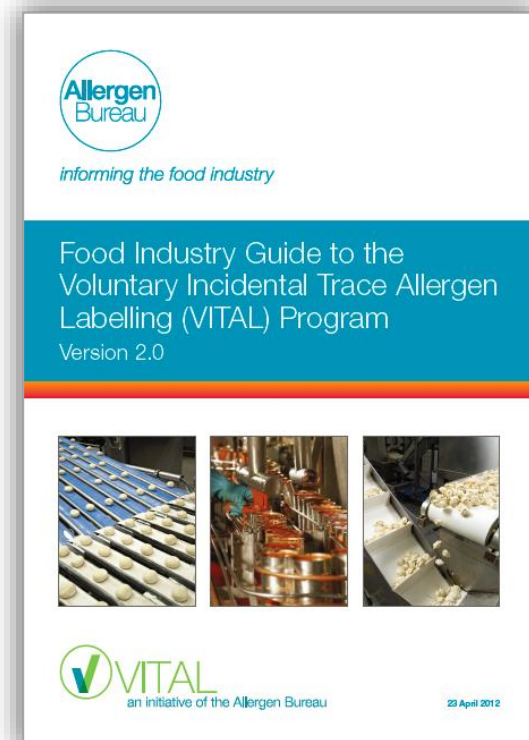
- Analysed existing published clinical data and some unpublished data (>1800 data points)
- Statistical modelling to look at implication for the allergic population
- Scientifically and clinically sound, defensible and transparent
- Published papers (Taylor *et al* 2014, Allen *et al* 2014)
- Protection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

VSEP meeting - 16 Oct 2018,



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

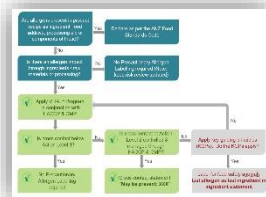
1. Determination of relevant allergens
2. Identification of intentionally added allergens
3. Identification and quantification of cross contact allergens due to ingredients
4. Identification and quantification of cross contact allergens due to processing
5. Calculation of total cross contact allergen 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 review tool
It is not just about cross contact!

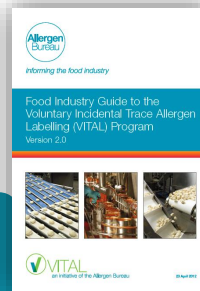


informing the food industry



Risk Review
Anomalies

VITAL Program



Tools & Helpline



VSEP



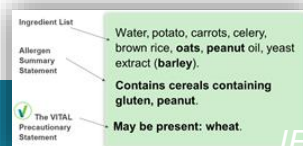
Training
Providers



VITAL Online



(WG2)
Communication



(WG3)
Certification



(WG1) Risk
Review



The VITAL® Framework

What we are working on and Why!

- Reconnecting and re-engaging on the basics
- Solving some old problems that don't go away
- Educating the Industry
- Educating the Consumer
- Consistency and standardisation

AusIndustry Webinars – Back to Basics

- The Allergen Bureau delivered three, one hour, live webinars on the topic of food allergy and allergen mgmt.
- Free event hosted by – Dept. of Industry, Innovation and Science Entrepreneurs' Programme and Food Innovation Australia Ltd
- Webinar 1 – Food Allergen Fundamentals (22 March 2018)
- Webinar 2 – Identification, Control and Mgmt (19 April 2018)
- Webinar 3 – Product Labelling and Recalls (24 May 2018)
- Invited topic experts – re-education, all about the basics
- <http://allergenbureau.net/resources/conference-presentations/2018-conference-presentations/>

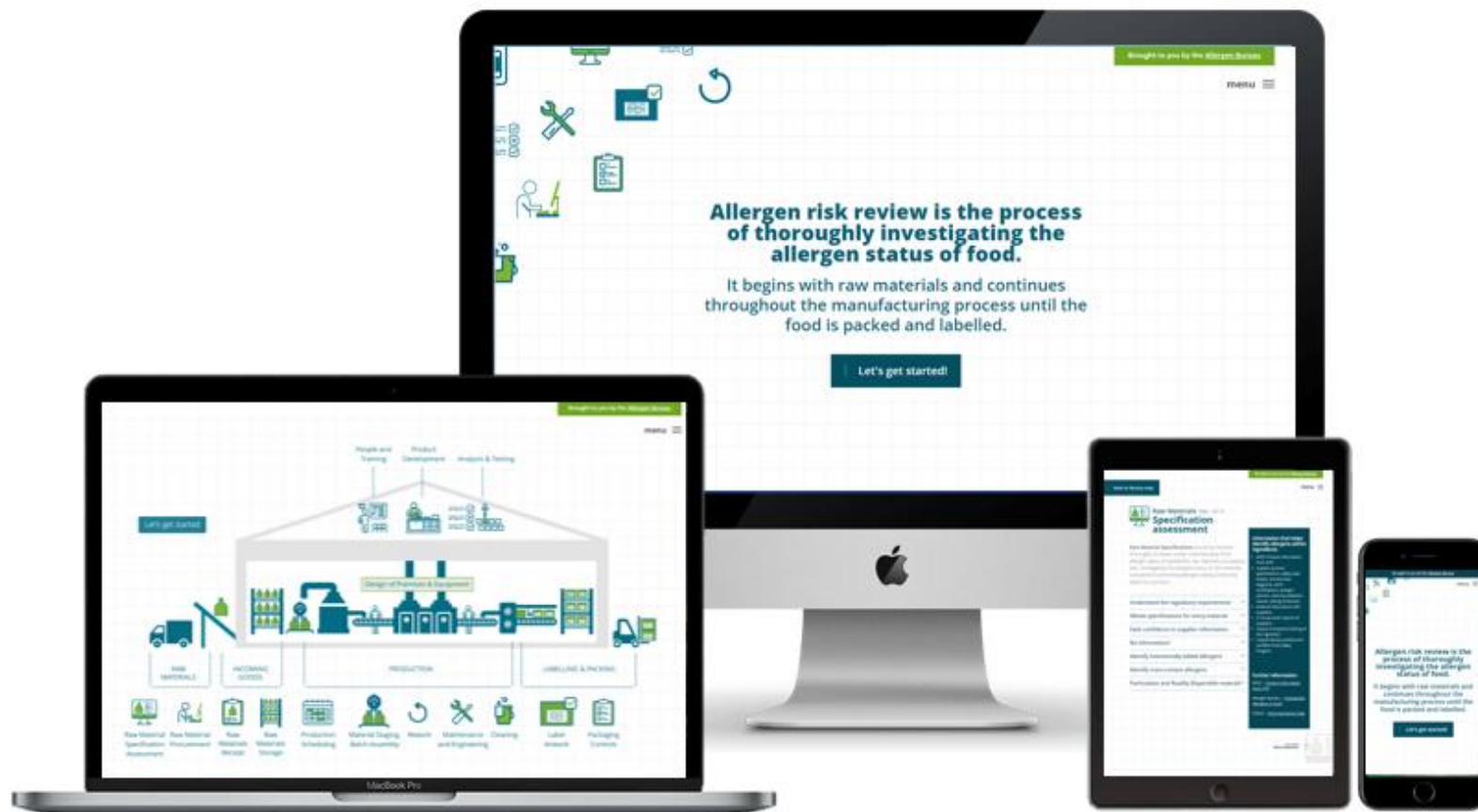
Our Projects and Collaborations

- AusIndustry Webinars
- Working group 1 – Risk Review
- Working group 2 – Labelling
- Working group 3 – VITAL Standard
- Risk Review Anomalies
- National Allergy Strategy
- FAMS2019
- Review of Gluten Free Certification Program

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!**

The Risk Review interactive website



Welcome!

The Allergen Bureau has developed this interactive factory map that shows where allergen risks can occur in different areas of a food manufacturing facility.

Explore the factory map, click on each icon to learn about the allergen risks, and discover ways to address these challenges.

Getting started Introduction

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 review includes identifying the presence of allergens that are intentionally added as well as identifying the risk and quantifying the allergens unintentionally present (cross contact allergens).

Information collected in an allergen risk review can be used to inform a **VITAL** risk assessment.

Each manufacturing facility is different and therefore it is not possible to include everything, but exploring the factory map and using the guidance is a great way to start the risk review process.

[back](#)

Getting started Step 1 Have an allergen management plan in place.

An Allergen Management Plan is a documented systematic approach towards identifying and controlling allergens in a food plant. It is applicable to all levels and all areas of a food company and sets the approach to the control and management of allergens.

Conducting a thorough **allergen risk review** is a continuous process that requires the support of many parts of the business including management. The review should be repeated regularly and updated after each change, for example, to staff, suppliers, equipment, scheduling, recipes, sites etc.


[back](#)

[next](#)



informing the food industry





Raw Materials

Step 1 of 15

Specification assessment

Raw Material Specifications should be checked thoroughly to obtain a clear understanding of the allergen status of ingredients, raw materials, processing aids. Investigating the allergens status of raw materials is essential to preventing allergens being unknowing added to a product.

A **risk review** is the process of assessing raw material specifications. It involves having confidence in supplier information, identifying the presence intentionally added allergens, and understanding the form and concentration of cross contact allergens.

A **VITAL Risk Assessment** for a recipe should only be conducted after the allergen status of each ingoing ingredient is fully understood

[more info](#)

←

prev step

next step

→

People and Product



Raw Materials Step 1 of 15

Specification assessment

Raw Material Specifications should be checked thoroughly to obtain a clear understanding of the allergen status of ingredients, raw materials, processing aids. Investigating the allergens status of raw materials is essential to preventing allergens being unknowing added to a product.

A **risk review** is the process of assessing raw material specifications. It involves having confidence in supplier information, identifying the presence intentionally added allergens, and understanding the form and concentration of cross contact allergens.

A **VITAL Risk Assessment** for a recipe should only be conducted after the allergen status of each ingoing ingredient is fully understood

more info



Raw Materials Step 1 of 15

Specification assessment

Raw Material Specifications should be checked thoroughly to obtain a clear understanding of the allergen status of ingredients, raw materials, processing aids. Investigating the allergens status of raw materials is essential to preventing allergens being unknowing added to a product.

Understand the regulatory requirements

Obtain specifications for every material

Seek confidence in supplier information

No Information?

Identify intentionally added allergens

Identify cross-contact allergens

Particulates and Readily Dispersible material

next step

Information that helps identify allergens within ingredients


- AFGC Product Information Form (PIF)
- supplier product specifications, safety data sheets, process flow diagrams, other certifications, allergen policies, cleaning validation results, testing schedules
- emails & discussions with suppliers
- in house audit reports of suppliers
- results of analytical testing of the ingredient
- independently audited and certified Food Safety Program

Further Information

AFGC – [Product Information Form \(PIF\)](#)

Allergen Bureau – [Unexpected Allergens in Food](#)

FSANZ – [Food Standards Code](#)



Raw Materials Step 1 of 15

Specification assessment

Raw Material Specifications should be checked thoroughly to obtain a clear understanding of the allergen status of ingredients, raw materials, processing aids. Investigating the allergens status of raw materials is essential to preventing allergens being unknowing added to a product.

Understand the regulatory requirements

Obtain specifications for every material

Contact the supplier directly and request information about the raw material. The Australia Food and Grocery Council's Product Information Form (AFGC PIF) provides an ideal specification format for capturing allergen information for materials. Seeking additional information can help build a more complete understanding of the ingredient.

Never use finished product labels as a specification. Ingredient lists and allergen declarations on the raw material packaging may have been adjusted to comply with labelling regulatory requirements and may not provide enough information for a risk review. Ask the supplier to complete an AFGC PIF if they do not have one on file.

Create a raw material specification library. Store the specification and supporting material in a central location and ensure the information is complete and current and includes the presence of allergens where relevant.

Ensure a process is in place to **manage updated PIFs** when provided by the supplier (or when changes occur).

Seek confidence in supplier information

No Information?

Identify intentionally added allergens

Identify cross-contact allergens

Particulates and Readily Dispersible material

next step →

Information that helps identify allergens within ingredients

- AFGC Product Information Form (PIF)
- supplier product specifications, safety data sheets, process flow diagrams, other certifications, allergen policies, cleaning validation results, testing schedules
- emails & discussions with suppliers
- in house audit reports of suppliers
- results of analytical testing of the ingredient
- independently audited and certified Food Safety Program

Further Information

[AFGC – Product Information Form \(PIF\)](#)

Allergen Bureau – [Unexpected Allergens in Food](#)

FSANZ – [Food Standards Code](#)



Production Cleaning Step 9 of 15

Cleaning equipment, preparation areas and the production lines of a food manufacturing site is necessary to eliminate allergen residue and the potential for cross contact. As facilities can vary in complexity, food materials, the allergen type, number, and nature, equipment type, and food contact surfaces, cleaning parameters may be unique to each process or site.

A **risk review** involves understanding the effectiveness of cleaning practices by investigating the cleaning controls, identifying cleaning trouble spots, validating and verifying cleaning procedures that can lead to allergen cross contact occurring.

For a **VITAL Risk Assessment**, it is necessary to conduct a risk review to determine the potential impact of allergen cross contact. A combination of scheduling and cleaning can be an effective method for the minimisation of allergen cross contact. If cleaning cannot remove all allergen residue however, the residue should be quantified during the risk review process and applied to the VITAL risk assessment as Hang Up.

[more info](#)

← prev step next step →



Production Cleaning Step 9 of 15

Cleaning equipment, preparation areas and the production lines of a food manufacturing site is necessary to eliminate allergen residue and the potential for cross contact. As facilities can vary in complexity, food materials, the allergen type, number, and nature, equipment type, and food contact surfaces, cleaning parameters may be unique to each process or site.

Hang Up

Hang Up is any residue or material that has accumulated at a specific area (point) within processing equipment on a manufacturing line and can become distributed into a subsequent product is Hang Up. It represents all forms of environmental cross contact.

Examples include residue from –

- pipework
- equipment such as pumps, mixers, homogenizers
- conveyors
- airborne dust
- utensils

A **Hang Up point** is a specific area (point) within processing equipment on a manufacturing line where material may accumulate instead of flowing through freely. It is important to correctly identify hang up points in your manufacturing facility. Some manufacturing facilities may be able to eliminate cross contact due to processing by having cleaning programs which have been validated to eliminate any product on the lines. Some plants, such as chocolate or dry-blend plants, face more significant challenges when eliminating cross contact allergens.

Cleaning controls and trouble spots

Cleaning validation and verification

Risk review considerations

← prev step next step →

Performing physical risk review

1. Assemble a cross-functional team
2. Consider all areas of the production line
3. Perform a physical audit by inspecting the processing equipment
4. Identify Hang Up points and other cross contact points
5. Consider the form of the cross contact (readily dispersible or particulate)
6. Quantify any cross contact that is present

Further information

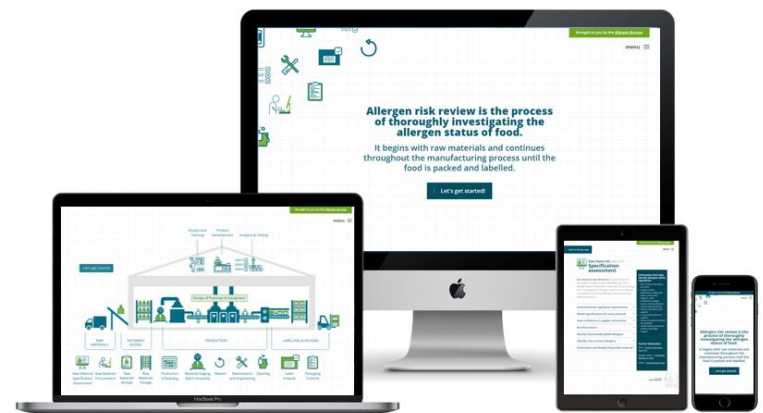
See Step – [Design of Premises & Equipment](#)
See Step – [Analysis & Testing](#)

← prev step PROCESS, PREMISES & EQUIPMENT

next step → LABEL ARTWORK

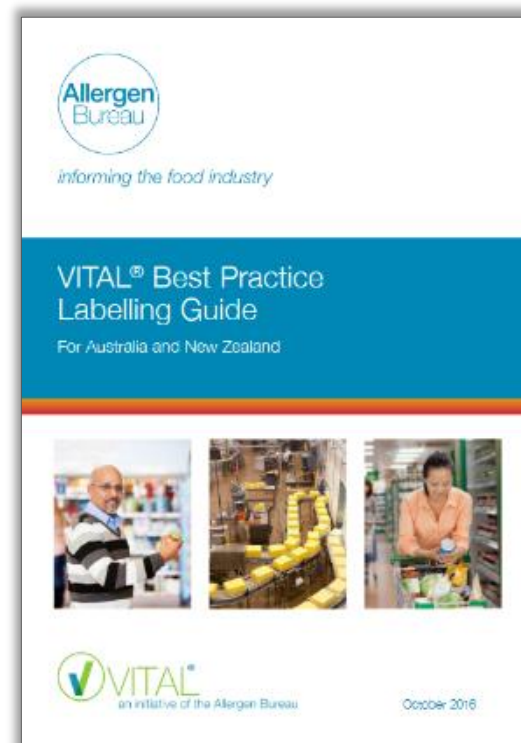
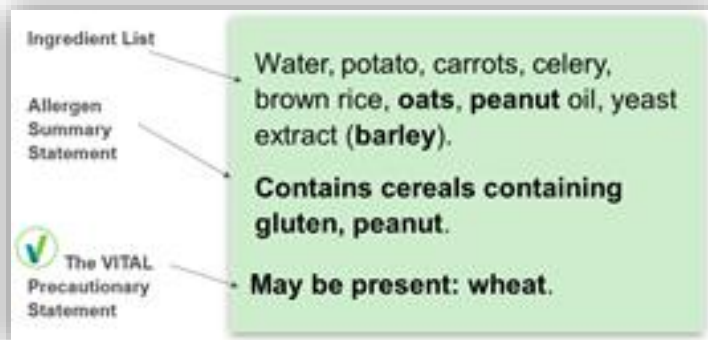
Key timings to launch of Risk Review website

- 12th Sept 2018 Initial demonstration at 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!



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



VITAL[®] Working Group 3 - Certification

- ✓ Completed drafting the 'VITAL Scheme' under ISO 17065 (**thanks Bill McBride!**)
 - auditable 'VITAL Standard'
 - rules and processes to be followed by accredited certification bodies (to meet ISO 17065)
- ✓ 'Bolt-on' to GFSI-recognised Stds + HACCP-based Allergen Mgmt Programs
- ✓ 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



Risk Review Anomalies – Collaborating with the Confectionery sector

- Milk in Dark Chocolate issue - Key Guiding Principles
- National Government/Jurisdiction perspective
- Legal Advice – Sharing with Stakeholders
- Linked considerations - issues and regulations
 - Vegan, Country of Origin, Defn. Dark Chocolate
- **Next steps** – Communication & Education



Food service project

Develop minimum standards for food allergen management training for food service

Food allergen Mgmt round table (Nov 2018) to guide and inform:

- Training for cooks and chefs
- Contribute to review of existing food safety training courses



Allergen Bureau - What we have learnt

- Go back to the beginning and teach the basics in a format everyone can relate to!
 - Make it visual
 - Interactive and interesting to empower
- Ensure you tackle the tough stuff, expose it and resolve it!
- Educate everyone involved and keep investing in that!

Collaboration is key

- ✓ Allergen Bureau continues to respond to stakeholder needs
 - Working groups
 - Investment in development of resources to support allergen management and VITAL[®]
- ✓ Collaborate with key stakeholders
 - National Allergy Strategy
 - FSANZ Allergen Collaboration
 - FSANZ consultation pieces
 - Codex consultation groups
- ✓ International Collaboration

[FAMS2019](#) May 2019, Melbourne.



Acknowledgements and Contact Details

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

