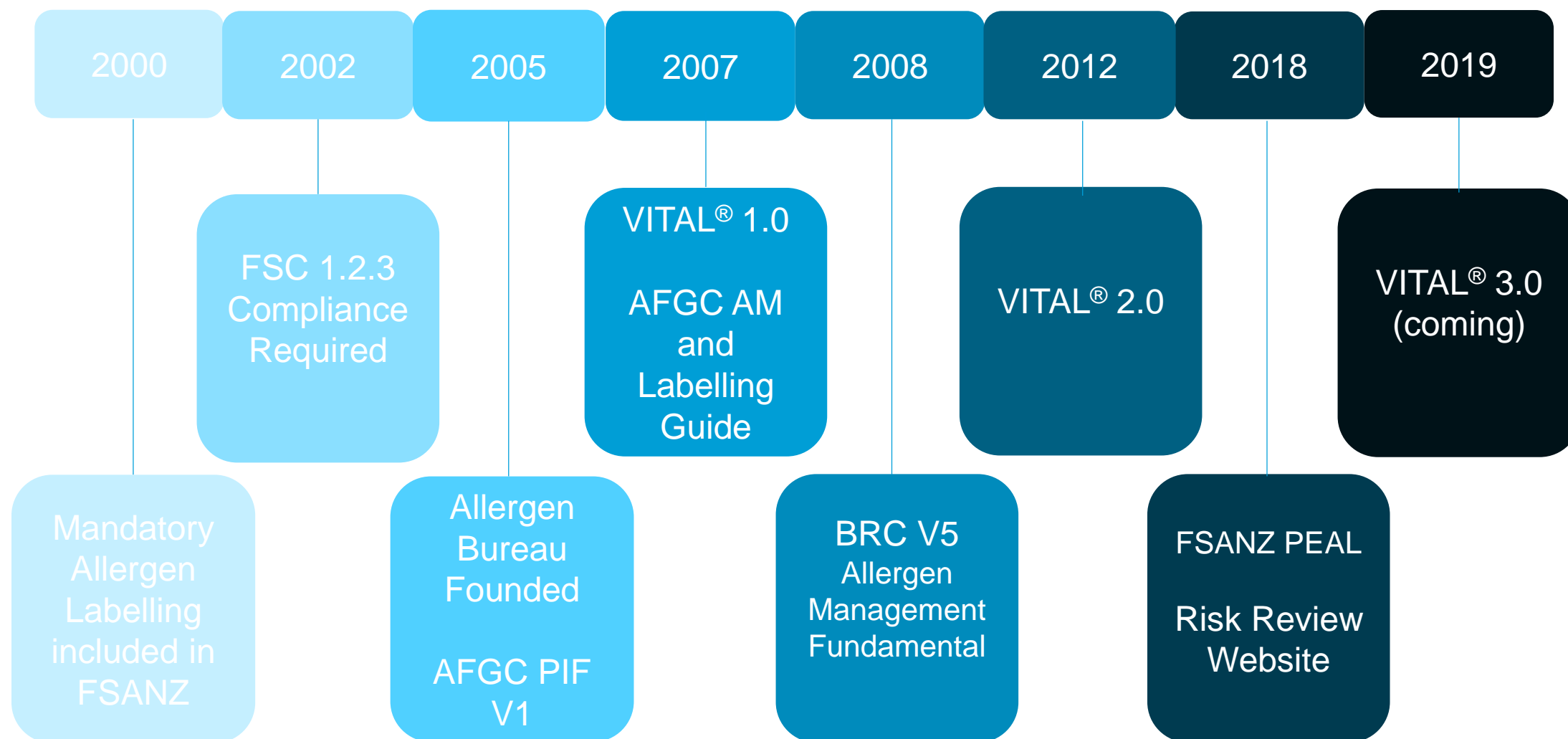


# ALLERGEN MANAGEMENT – WHAT WE SHOULD KNOW AND WHAT IS NEW

The 3<sup>rd</sup> Food Allergen Management Symposium 2019  
13<sup>TH</sup> to 16<sup>th</sup> May 2019

Presented by: Jasmine Lacis-Lee, Food Safety Manager –  
Microbiology & Allergens

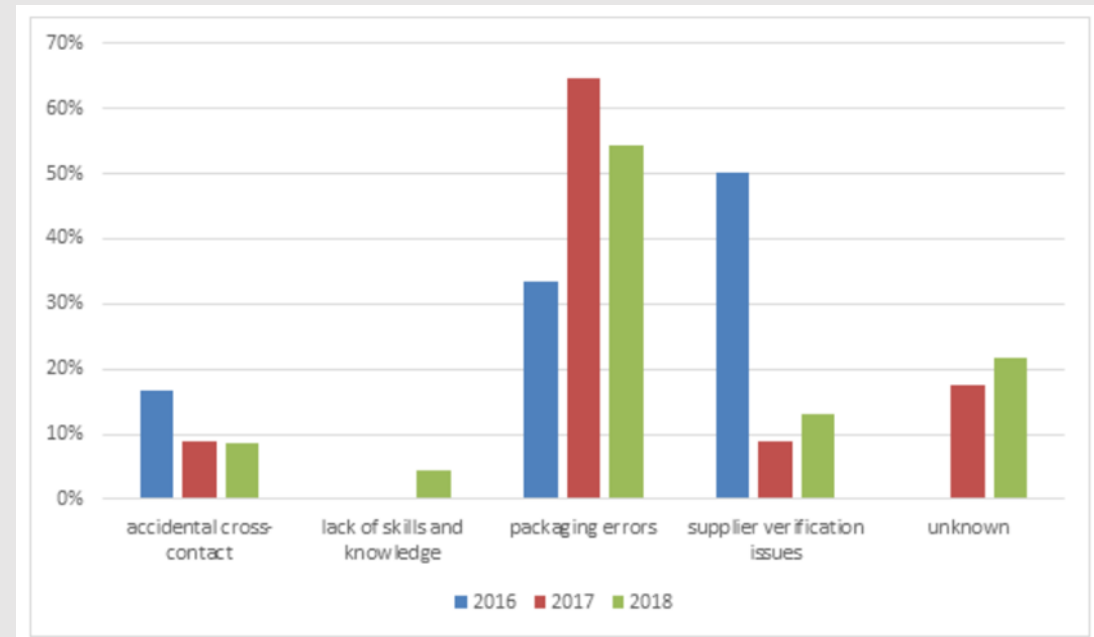
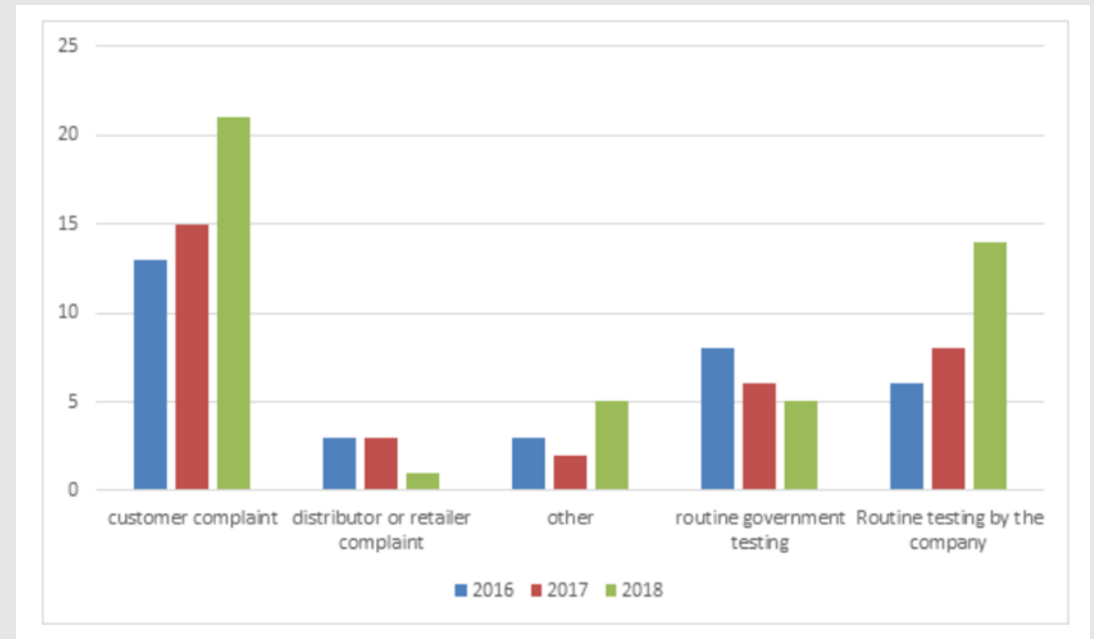
# WHERE HAVE WE COME FROM.....



# RECALL SUMMARY

- *Since 2013 Allergens have been the leading reason for recalls*
- *2016-2018 leading reason for recall driven by customer complaints and analytical testing*
- *Most recalls are a result of labelling error, wrong product – wrong pack, or unexpected allergen*

<http://www.foodstandards.gov.au/industry/foodrecalls/recallstats/Pages/allergen-stats.aspx> Figure 2 & 4



# MINIMUM STANDARDS

---

- *Expectation that food allergens, as described in the regulations are recognised*
- *Allergen Management Plans*
  - Supporting Procedures and Checks
  - Allergens should be identified in all areas of the process
  - All staff should be trained
- *Inclusion of Allergens in HACCP tables*
  - But this is NOT enough!

# USEFUL CHECKS FOR MANAGING ALLERGENS IN YOUR FACILITY



- ***Ingredient / Raw material checks***

- On receipt
- At point of use

- ***Mass Balance***

- Did you make the volume you expected?

- ***Sensory Evaluation & On site analysis***

- Is the product to specification? Is the protein high?
- Is the sensory profile as you expected?

# USEFUL CHECKS FOR MANAGING ALLERGENS IN YOUR FACILITY



## • *Packaging Checks*

- Label verification
- Date code check
- Weight check
- Integrity check

## • *Cleaning*

- Is it validated?
- Was it effective?
- Visual clean?
- Supporting analytical checks?

# WHY IS HACCP ALONE IS NOT ENOUGH?

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- *Process only focused*
- *Not all risks are assessed*
- *Pre-requests included, superficial & assumed*
- *A risk assessment for the true allergen risk needs to include all areas of the process from supplier approval → finished product*

# CHALLENGES CONTINUE

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- *Imported products and ingredient – compliance to the FSC*
- *Agricultural co-mingling*
- *Co-packing, co-manufacturing – perception of responsibility*
- *Resources (People and Financial)*
- *Technical knowledge*
- *Perceived level of risk – food service products, cafes/restaurants*
- *Free from claims increasing*



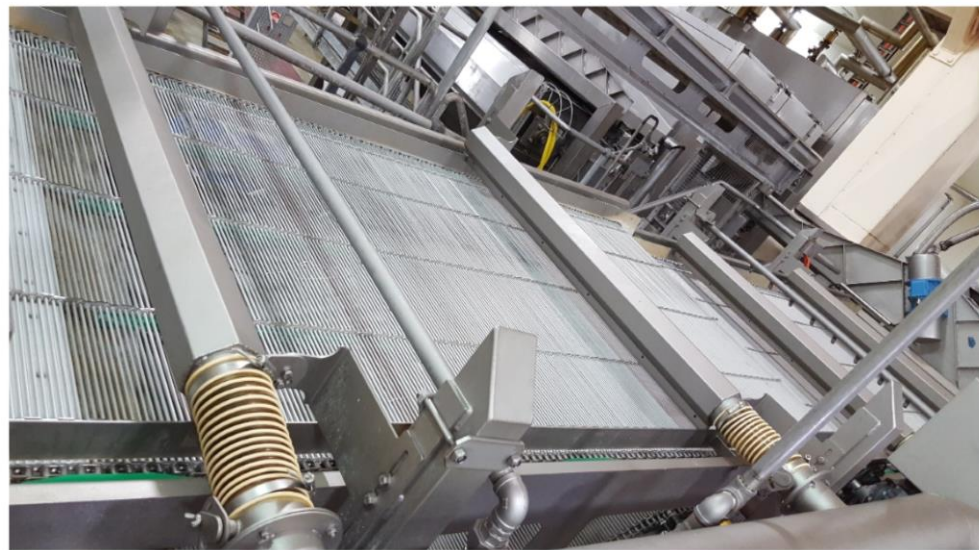
# YES, ASSESSING THE RISK IS STILL HARD!

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"THE SECRET OF  
CHANGE IS TO FOCUS  
ALL OF YOUR ENERGY,  
NOT ON FIGHTING THE  
OLD, BUT ON BUILDING  
THE NEW."

— *SOCRATES*

# RISK ASSESSMENT VARIABLES

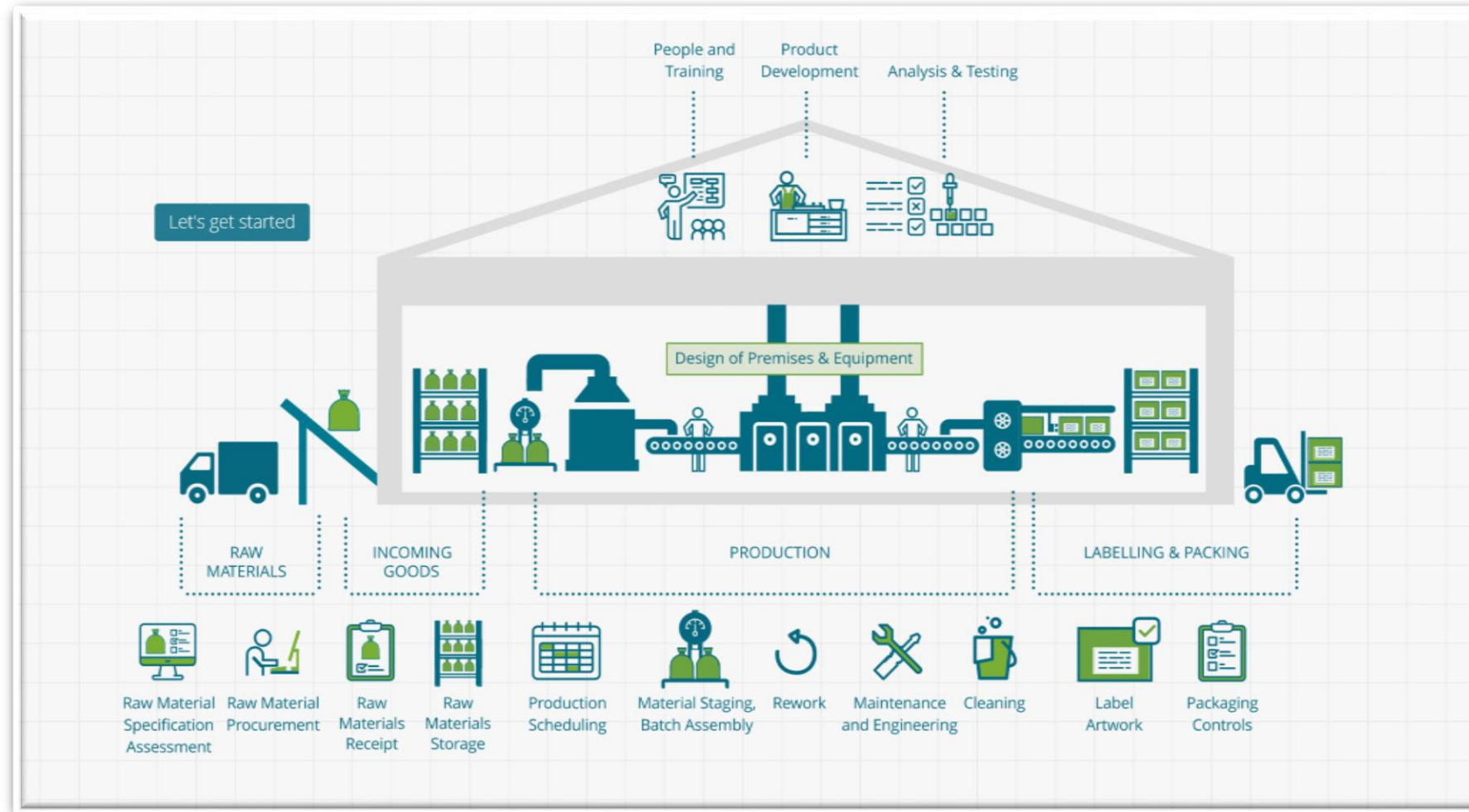


# ALLERGEN BUREAU RISK REVIEW WEBSITE

- *Launched 2018*
- *More than 150 years combined industry experience*
- *Working Group consisted of Industry, Retailer, Regulator representatives*



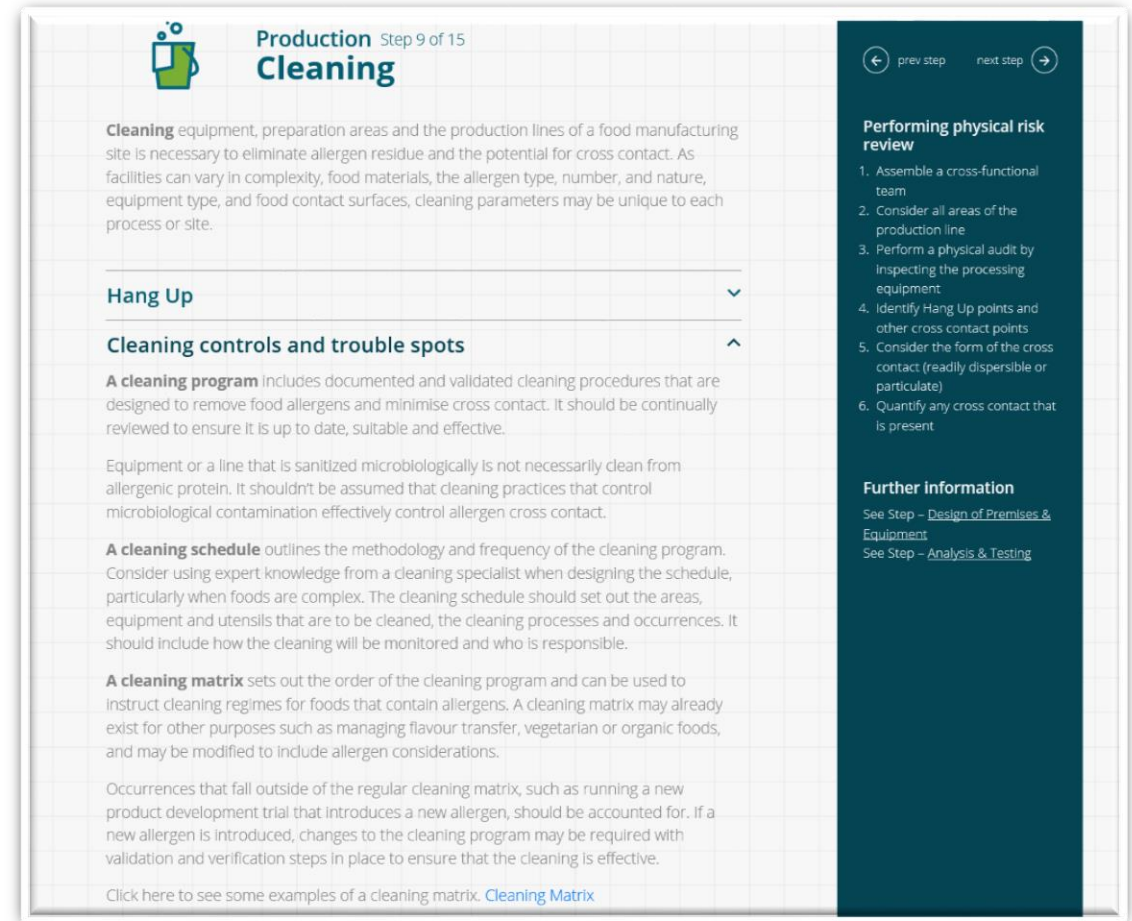
# FACTORY MAP





# CAPABILITY

- **FREE!**
- **Website based**
- **Applicable to ALL areas of the food industry**
- **Includes:**
  - Overviews
  - Detailed explanations
  - Worked examples
  - Case studies
  - Document examples
  - Links to other related areas
  - Links to related industry information and guides



The screenshot displays a web-based interface for a 'Production Cleaning' step, identified as 'Step 9 of 15'. The main content area provides detailed information on cleaning equipment, preparation areas, and production lines, emphasizing the need to eliminate allergen residue and prevent cross-contact. It includes sections for 'Hang Up', 'Cleaning controls and trouble spots', and 'Further information'. The 'Further information' section lists links to 'Design of Premises & Equipment' and 'Analysis & Testing'. A sidebar on the right contains a 'Performing physical risk review' checklist with six steps, from assembling a cross-functional team to quantifying cross-contact. Navigation controls for 'prev step' and 'next step' are visible at the top of the sidebar.

**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**

**Cleaning controls and trouble spots**

**A cleaning program** includes documented and validated cleaning procedures that are designed to remove food allergens and minimise cross contact. It should be continually reviewed to ensure it is up to date, suitable and effective.

Equipment or a line that is sanitized microbiologically is not necessarily clean from allergenic protein. It shouldn't be assumed that cleaning practices that control microbiological contamination effectively control allergen cross contact.

**A cleaning schedule** outlines the methodology and frequency of the cleaning program. Consider using expert knowledge from a cleaning specialist when designing the schedule, particularly when foods are complex. The cleaning schedule should set out the areas, equipment and utensils that are to be cleaned, the cleaning processes and occurrences. It should include how the cleaning will be monitored and who is responsible.

**A cleaning matrix** sets out the order of the cleaning program and can be used to instruct cleaning regimes for foods that contain allergens. A cleaning matrix may already exist for other purposes such as managing flavour transfer, vegetarian or organic foods, and may be modified to include allergen considerations.

Occurrences that fall outside of the regular cleaning matrix, such as running a new product development trial that introduces a new allergen, should be accounted for. If a new allergen is introduced, changes to the cleaning program may be required with validation and verification steps in place to ensure that the cleaning is effective.

Click here to see some examples of a cleaning matrix. [Cleaning Matrix](#)

**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](#)

# KEY MESSAGES

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- ***Key business question:***

- Who is your customer?
- What is your brand worth?

- ***Scientific based risk assessment tool (e.g. VITAL Program), used correctly:***

- Eliminate and reduce the risk
- Understand all areas of risk in your business
- Business decisions based on supported science
- Protects the consumer

- ***Key food industry question:***

- Australians have lead the way – can we maintain the challenge to stay ahead?



# THANK YOU



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