



informing the food industry

Navigate the Science. Manage the Risk.

NZMS Scientific Food Allergen Seminar

Auckland, 20 August 2019

Christchurch, 22 August 2019

Debbie Hawkes

Director, Allergen Bureau

(General Manager –Quality & Operations ANZ, Hawkins Watts)

Quick Poll:

How many people
in the room have a
Food Allergy or
have a close relative
with a Food Allergy?

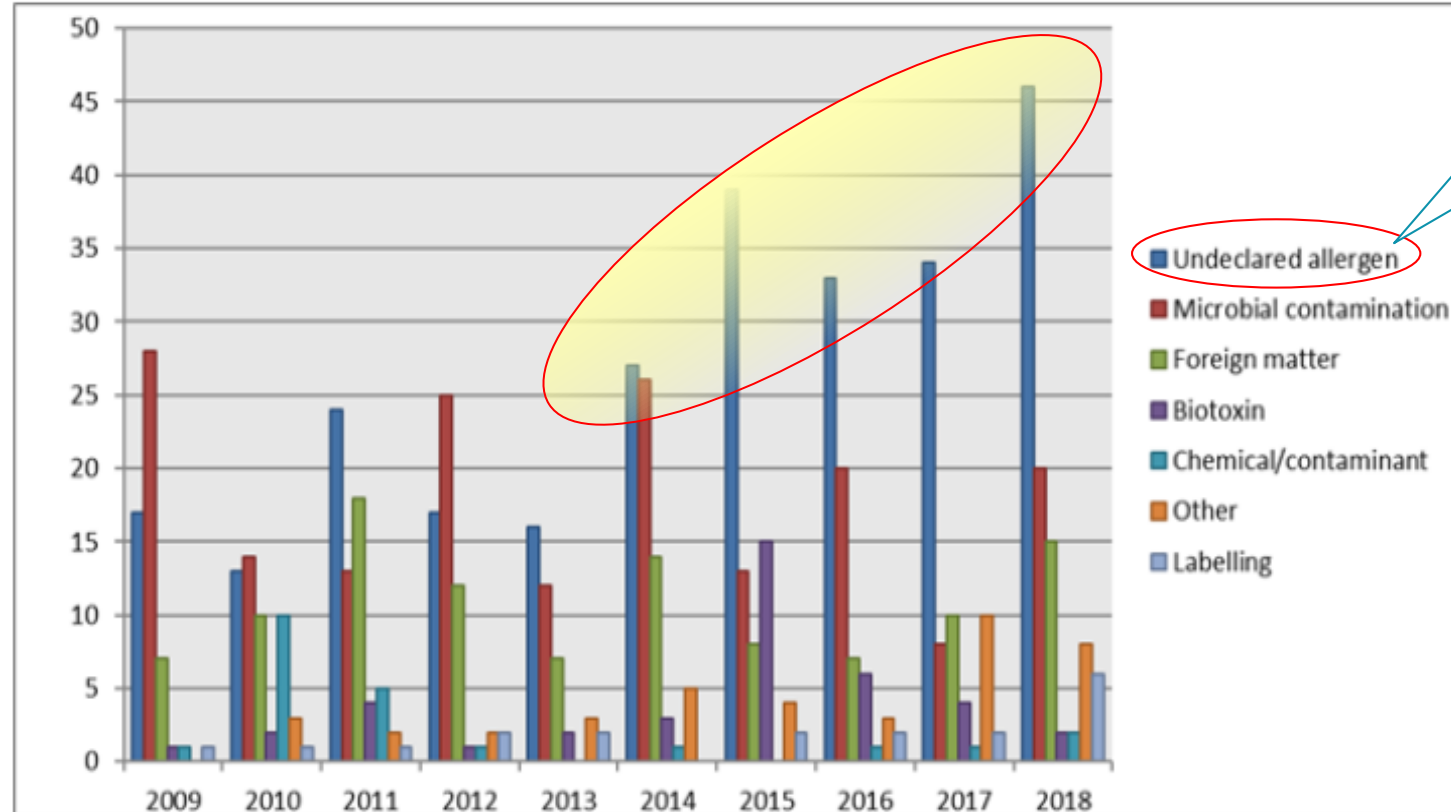


Overview

- FSANZ Allergen related recall stats
- Who is the Allergen Bureau? Mission & Vision
- Why is this topic so important?
- VITAL[®] Program
- FAMS2019, VSEP & transition VITAL 2.0 to VITAL 3.0
- Allergen Risk Review Website
- Further AB Working Groups & Recent Activities
 - ✓ VITAL Standard – Certification
 - ✓ Risk Review Anomalies
 - ✓ Food Industry Guide to Allergen Management and Labelling
 - ✓ Agricultural Cross Contact Working Group
 - ✓ Food Allergen Analysis added to Website



FSANZ Allergen related Recall Stats



Undeclared Allergens are still the major cause of FSANZ (Australian) recalls (46% in 2018)

FSANZ identified key causes for allergen related recalls:

- ✓ Packaging errors
- ✓ Supplier allergen verification
- ✓ Lack of skills/knowledge of labelling requirements
- ✓ Accidental cross contamination

2019 MPI NZ stats:

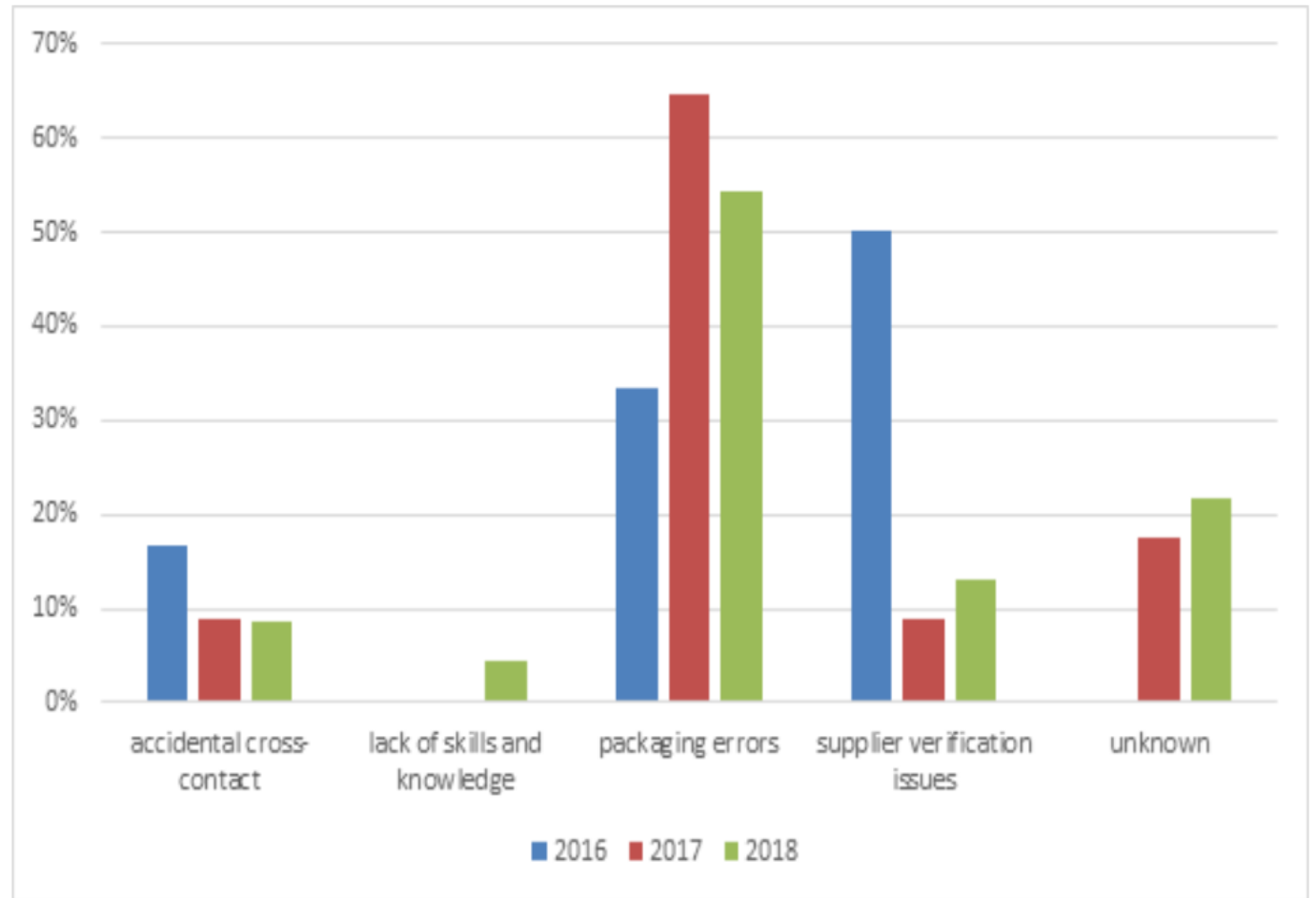
26/49 (53%) Undeclared allergen

Source: <http://www.foodstandards.govt.nz/industry/foodrecalls/recallstats/Pages/default.aspx>

Reasons for Allergen recalls?

1. Packaging errors
2. Supplier verification
3. Unknown
4. Accidental cross contact
5. Lack of skills/knowledge of labelling requirements

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



Overcoming these statistics

- ✓ **Ensure the business has a robust allergen management plan**
- ✓ **Implement a risk assessment tool. e.g. VITAL[®]**
 - Eliminate and reduce the allergen risk in your facilities
 - Understand and manage the risk



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



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Allergen Bureau Organisation

Board of Directors

Kirsten Grinter (Nestlé Australia Ltd)

Caroline Gray (DuPont)

Debbie Hawkes (Hawkins Watts)

Jasmine Lacis-Lee (DTS Food Assurance)

David Henning (Invited Director)

Our support network

VITAL[®] Coordinator / Support

Georgina Christensen & Lisa Warren

Technical expertise

Simon Brooke-Taylor & Robin Sherlock

VITAL Scientific Expert Panel (VSEP)

Funded Secretariat

Tom Lewis, Ray Murphy, Alice Doyle

Top ten countries visiting **Allergen Bureau website**

Australia (40%)

New Zealand (8%)

United Kingdom (7%)

United States (7%)

Netherlands (4%)

Germany (4%)

Spain (3%)

France (2%)

India (2%)

Italy (2%)

10,923 Non-bounce sessions Jan – Jul 2019



VITAL[®] Online subscriptions

- Over 3100 registered organisations use the VITAL[®] Online, with over 4850 individual users
- Top 10 Countries by users
 - ✓ Australia
 - ✓ New Zealand
 - ✓ Netherlands
 - ✓ United Kingdom
 - ✓ Germany
 - ✓ Spain
 - ✓ Italy
 - ✓ United States
 - ✓ Belgium
 - ✓ France



International Interest still growing

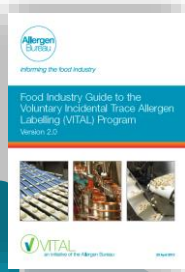


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Agricultural
Allergen Cross
Contact WG

VITAL Program



Tools & Helpline



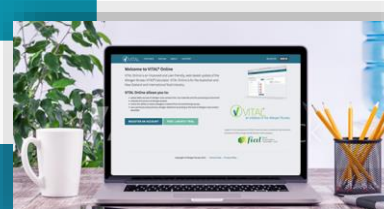
VSEP



Training
Providers



VITAL Online

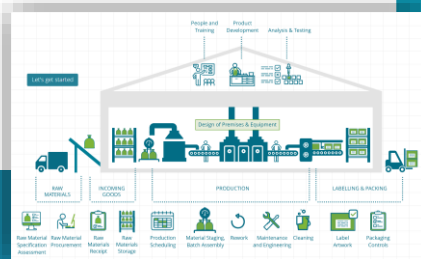


(WG1) Risk
Review

(WG3)
Certification



Risk Review
Anomalies



The
VITAL
Framework

Why is this so important?



Adverse Reactions to Food

Immune Mediated

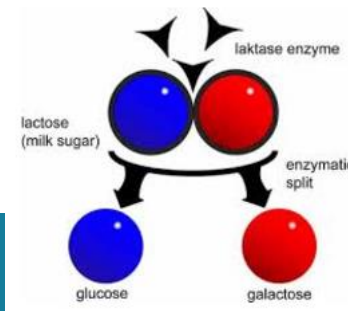
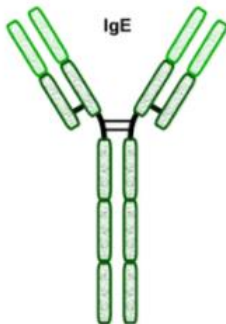
Non-immune Mediated

IgE Mediated
(e.g. **food allergy**)

IgE Mediated
(e.g. **coeliac disease**)

Metabolic
(e.g. **lactose intolerance**)

Other (e.g. **sulphite sensitivity**)



Some symptoms of an allergic reaction to a food



Urticaria



Atopic Dermatitis



Anaphylaxis

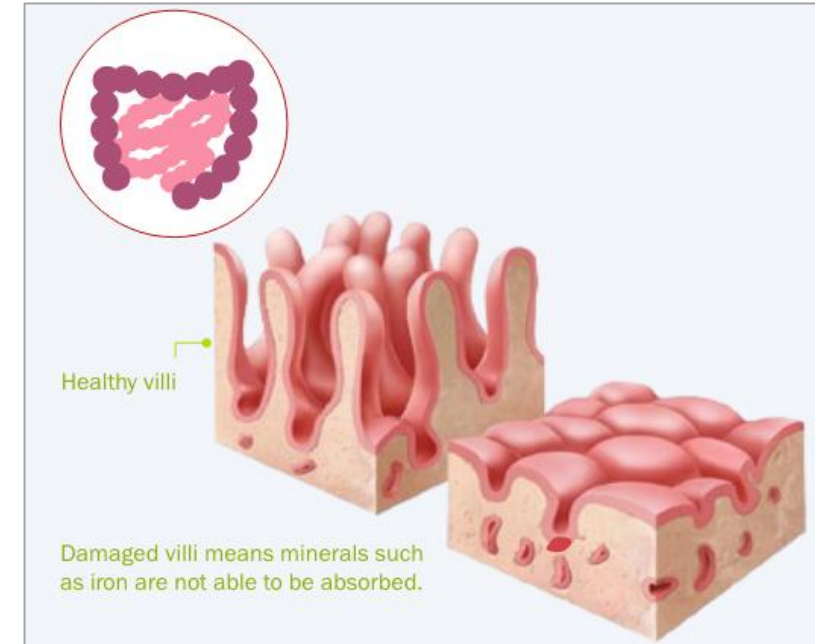
The allergic reaction

- **Dermal** – skin breaks out in hives or eczema
- **Gastrointestinal** – nausea, cramps, diarrhoea
- **Respiratory** – struggle for air
- **Circulatory** – blood pressure drops, lose consciousness

Anaphylaxis is an acute allergic reaction ~
in rare cases, multiple organ systems are affected
and death can occur in as little as ten minutes

Coeliac disease

The immune system reacts abnormally to gluten (a protein found in wheat, rye, barley and oats) causing small bowel damage.



Wheat allergy (allergic response to wheat protein)
is different to coeliac disease
(immune response to gluten proteins)

Food intolerance

Detrimental reaction to food – not a food allergy. Symptoms are generally less serious than true food allergy and often limited to digestive problems.



Lactose intolerance is an example where a person is intolerant to the lactose carbohydrate in milk which is different to an allergy to milk protein

Sulphite intolerance

Sulphites are a family of preservatives permitted for use in some food and drinks. (Additives 220-228)

Sulphite intolerance can trigger asthma symptoms in individuals with underlying asthma.

Wheezing is the most common reaction to sulphites. In very rare cases however, anaphylaxis can occur.

Impact of food allergy

- There is currently no cure
- Sensitivity differs between individuals, depends on type of food, amount ingested and other activities at time of ingestion
- People with food allergy do not know when their next allergic reaction will occur or how severe it will be.
- **But 65%** of food products in Australian supermarkets have a Precautionary Allergen Label (PAL).
Are they all valid?



Avoidance of the food is the only protection



Food allergy rates increasing in Australia & New Zealand

Food allergy affects*

- 11% infants
(up to 12 months old)
- 4-8% children
(up to 5 years)
- ~2% adults

- Rapid increase in food allergic disease in last 30 years in mainly the Western world
- 80% of children outgrow milk, egg, soy and wheat allergy by age 5
- individuals allergic to peanuts, tree nuts, sesame or seafood will have this for life

*ASCIA 2015 www.allergy.org.au

Milk mislabelled in coconut

At the time, the responding hospital was not required to and did not notify the department that this Coconut beverage was the suspected cause of the boy's anaphylactic reaction.

As a result the Coconut milk remained in the marketplace for **six weeks** before being recalled, putting other milk-allergic consumers at risk.

Child aged 10 dies after drinking coconut drink, importer admits label charges

By Tim Bartas

Updated 4 October 2015 - 5:58am, first published at 12:00am



A 10-year-old child died from an allergic reaction after drinking a "natural" coconut drink imported by a Sydney firm.

The canned product from Taiwan, Greentime Natural Coconut Drink, is sold in most states and was recalled just over a month later following the tragedy in December 2013. But it was never revealed that it was blamed for causing the fatal anaphylactic reaction in the child from Melbourne.

The NSW Food Authority said importer Narkena Pty Ltd, based in western Sydney, pleaded guilty in September to three labelling charges and will be sentenced later this month.

The authority said the company entered pleas of guilty to two charges that the drink was labelled in a way that falsely described the food and to one charge of selling food in a manner that contravened the Food Standards Code.



KILLED allergic after 'all confuse packet

Cadbury has year-old Isal the allergen

By Thomas Burrow
20 Sep 2018, 11:39 |



A NINE-YEAR-OLD wrong Cadbury packaging.

Isabel Marrero mum Helen ga



▲ Natasha at Heathr

The sa on its

year before a teenage sch

What is the new law?

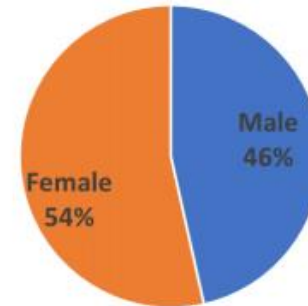
Victorian Public Health & Wellbeing Act 2008, effective from 1 November 2018.

- All Victorian public and private hospitals must notify the department of **all** cases presenting to hospital for treatment of anaphylaxis.
 - All ages, all causes: food, blood-derived products, drugs, vaccine, insect venom, other/unknown included.
- *Public Health and Wellbeing Regulations 2009* prescribe the manner and period for notification.
- Australian first.

Preliminary data

1 November 2018 – 1 May 2019 (26 weeks)

1200 notifications in total
46 per week on average



Timeliness:

- Packaged food notifications received: 24 hr from diagnosis
- All other notifications received: 1-2 days on average

Context of reaction:

- 46% of food-related cases are **first time reactions**
- Majority of remaining food cases involve **consumption in error**

Data gathered

Case information

- Demographics (age, gender, country of birth)
- Adrenaline auto-injector carriage
- Prior history of allergy
- Circumstances around food consumption (accidental, Precautionary Allergen Labelling)

Suspected cause of anaphylaxis

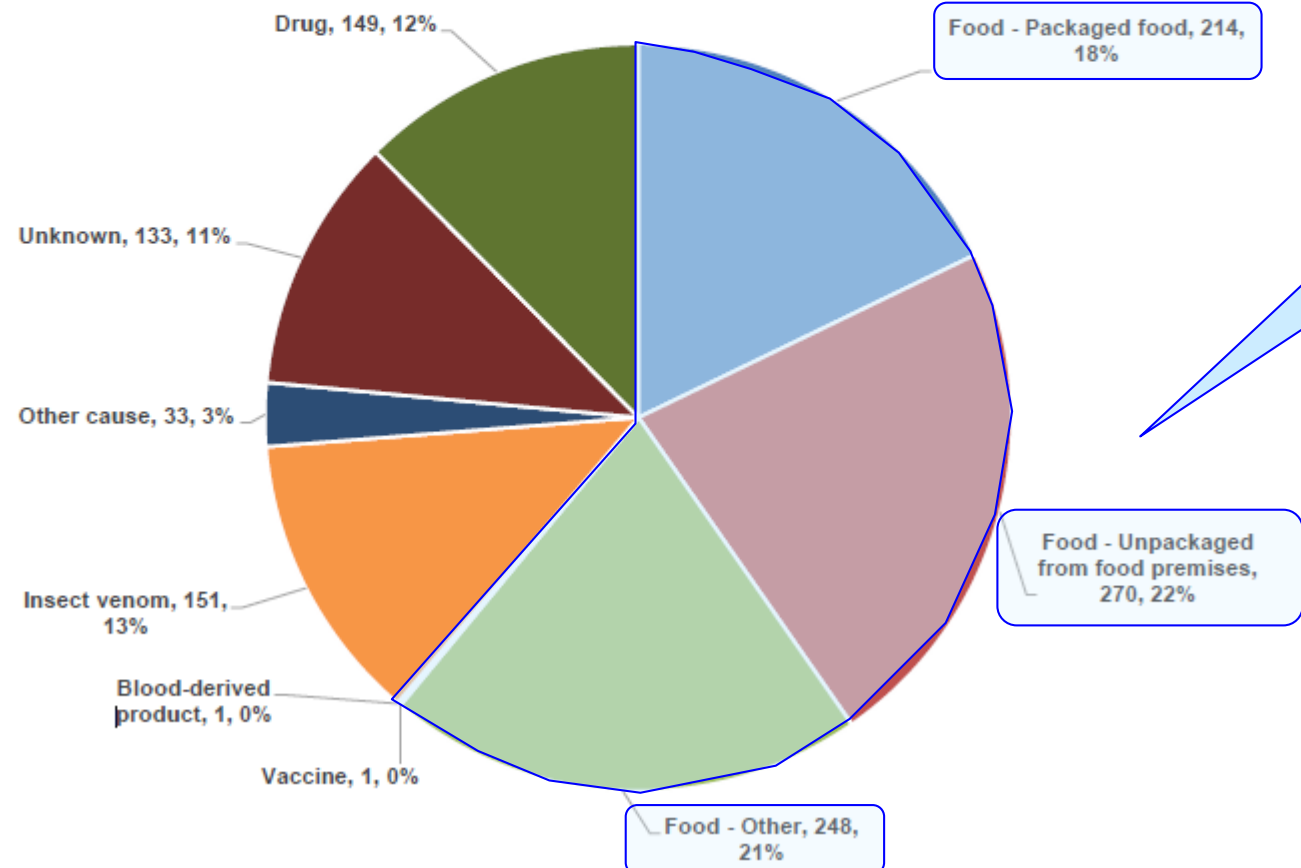
*Food
Related*

- Packaged food – type and brand
- Unpackaged food from food premises – food, premises
- Food – other
- Blood-derived product – product, batch number
- Drug – type, name
- Vaccine – type, name
- Insect venom – insect type
- Other – details of suspected cause
- Unknown - any relevant details

Preliminary data

1 November 2018 – 1 May 2019, Victoria

Number and proportion of anaphylaxis notifications by suspected cause (n=1200)



Food Related
214, 18%
270, 22%
248, 21%
732, 61%

Labelling examples

Contains soy and milk
BUT
no soy or milk in ingredient list



Labelling examples



Labelling examples – Same/Similar product but 3 different allergen positions

39g Crème Egg

Contains: Milk, Wheat
Glucose Syrup, Soy and Egg
May contain: Traces of
Peanuts and Tree Nuts



Contains: Milk, Soy + Egg and Wheat

130g Crème Egg Minis

Contains: Milk & Soy
May contain: Traces of
Peanuts and Tree Nuts



Contains: Milk, Soy

234g Crème Egg Bag

Contains: Milk, Wheat,
Glucose Syrup, Soy and Egg
May contain: Traces of
Peanuts and Tree Nuts



180g Cadbury Dairy Milk Packed with Crème Egg Block

Contains: Milk and Soy
May Contain: Traces of
Wheat, Peanuts and Tree Nuts.



Labelling examples – “Gluten Free”



Be aware “**Gluten-Free**” has different definitions around the world.

Codex & EU, US “Gluten-Free” is <20 ppm

FSANZ Sched 4-3:

Nutrition, health & related claims:

The food must not contain:

- (a) detectable gluten; or
- (b) oats or oat products; or
- (c) cereals containing *gluten that have been malted, or products of such cereals.

Labelling examples - Improvement

2018 – Milk removed



2019 – Egg added, Soy removed



Why should the food industry manage food allergens?

- Protect allergic consumers
- Consumers depend on food that is labelled correctly
- Food safety necessity
- Legal requirement for declaring food allergens, and providing safe food
- Costly to have non-compliance, allergen issues with consumers, recalls, withdrawals, re-labelling



Milk



Egg



Shellfish



Fish



Tree Nuts



Wheat



Peanut



Soybean





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The VITAL[®] Program



VITAL Program – Why was it developed?

- *May contain* Inconsistent use of Allergen Risk Assessment
- Proliferation of cross contact statements across the industry, survey of 350 products in 2005 revealed 42 creative statements!
- Allergic consumers were ignoring cross contact statements
- Action levels varied between manufacturers, no consistency

May contain ...	May contain traces of...	Packed in an environment where ... may be present	Made in a facility that also processes ...
Produced in a factory which handles ...	Produced on shared equipment which also processes ...	Made on the same production line as...	Made in a production area that also uses ...
No nuts in ingredients, but cannot guarantee to be nut-free	Not suitable for ... allergy sufferers	Due to methods used in the manufacture of this product, it may occasionally contain...	May be present: ... (used by VITAL™ 2.0)

Voluntary Incidental Trace Allergen Labelling

The VITAL[®] Program is a standardised allergen risk assessment process for food industry



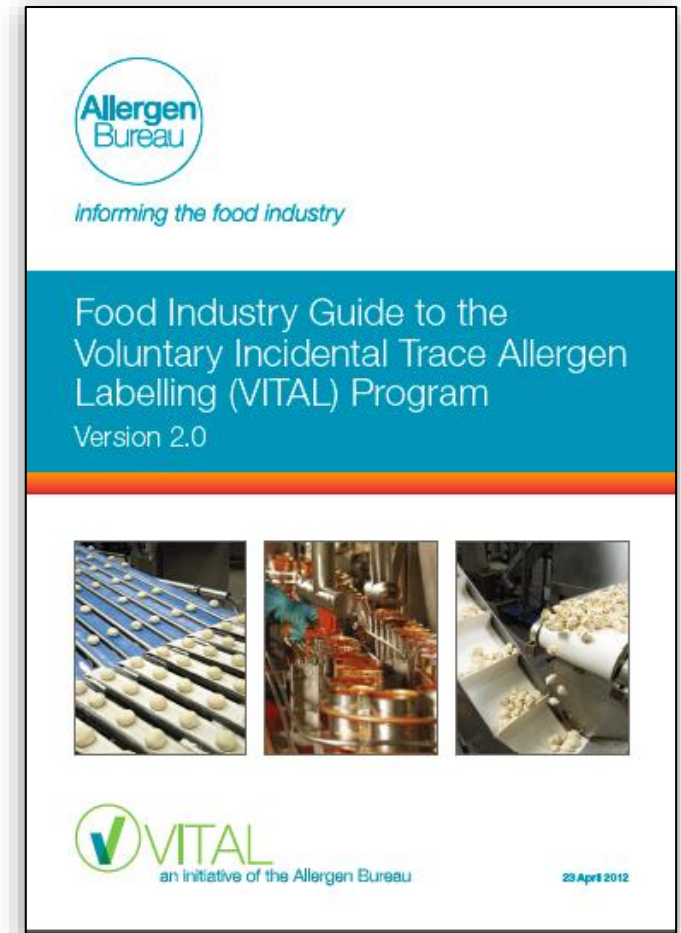
Developed by industry
for industry and is adopted
on a voluntary basis



The VITAL[®] Program **MUST** be part of ...

An established allergen management plan
which includes...

a HACCP based food safety program
that is adapted for allergen control



The 10 Steps of VITAL[®]



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's not just about cross contact!**





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VITAL® Training Providers Region/Countries of Delivery

VITAL® Training

- Available through endorsed training providers
- Obtain VITAL training certificate by attending the training course
- Endorsed training providers listed on [AB website](#)

Training Providers Home Base	Training Provider Name	Languages	Region/Country of VITAL Training Delivery										
			Australia	NZ	SE Asia	North Asia	Pacific	Africa	Europe	USA & Canada	Mexico & S.America	Virtual (V)	Online (O)
Australia	BSI Group	English	●	●	●	●	●		●	●			
	DTS FACTA	English	●	●	●	(V) Only	●	(V) Only	●	●	(V) Only	●	
	HACCP Mentor	English	●	●	(V) Only	(V) Only	●	(V) Only	●	●	(V) Only	●	●
	Integrity Compliance Solutions	English	●	●	SE Asia, India	China, Japan, Korea	●	(V) Only	●	●	(V) Only	●	●
New Zealand	SIS Training & Consulting Ltd	English		●									
Africa	FACTS							●					
Europe	Allergenen Consultancy	Dutch, English							NL, BE, (Other countries (V) on request)			●	●
	Eurofins Analytics France	French (English, German)							All French speaking countries, UK and NL, DEU on request.				
	FIS Europe	German, English							DEU, AUT, NL, CH, BE, UK			●	●
	ifp - Institut für Produktqualität	German, English							DEU, AUT, CH (in German). Other EU countries in English			●	
	KTBA FoodCampus	Dutch, English							NL, BE				
North America	Sabal Food Safety Consulting	English, Spanish							●	●	●	●	●

● Training delivered in this region/country

Virtual (V) Live interactive web-conference with trainer and other class participants

Online (O) Recorded non-interactive modules/webinar with online trainer assessment



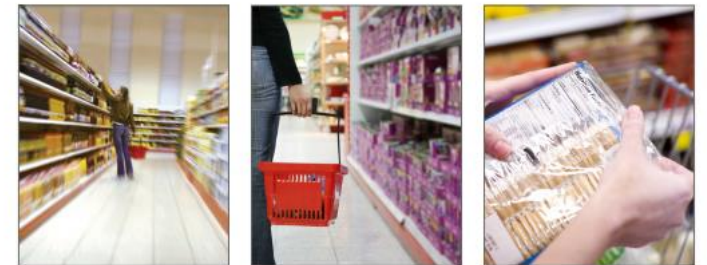
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FAMS2019, VSEP & new Reference Doses



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Summary of the VITAL Scientific
Expert Panel Recommendations





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FAMS2019 3rd Food Allergen Management Symposium

Navigate the science, manage the risk

Key Speakers

- ✓ Professor Steve Taylor, Food Allergy Research & Resource Program, University of Nebraska, USA
- ✓ Joseph Baumert, Food Allergy Research & Resource Program, University of Nebraska, USA
- ✓ René Crevel, René Crevel Consulting Ltd
- ✓ Samuel Godefroy, Université Laval, Québec, Canada
- ✓ Jonathon Hourihane, University College Cork, Ireland
- ✓ Derek Castles, 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
- ✓ Sandra Vale, National Allergy Strategy, Australia



<http://allergenbureau.net/resources/conference-presentations/2019-conference-presentations/>

VSEP: More clinical data, better modelling => new Reference doses

Refer : [Ben Remington \(TNO\) - The Modelling Behind the Translation from Individual Thresholds to Population Threshold Dose Distribution](#) at FAMS2019.

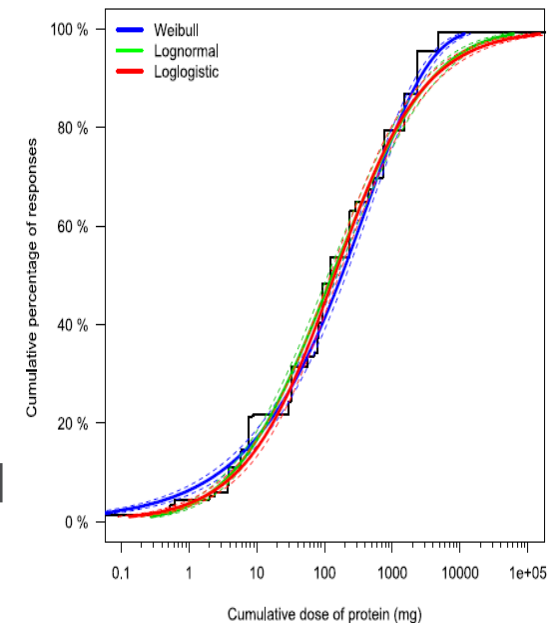
Project determines how individual thresholds from food allergic subjects can be grouped and analyzed statistically to determine population threshold for a number of food allergens.

Based on objective Double blind, placebo-controlled food challenges, with description of NOEAL (No observed adverse effect level) and/or LOAEL (Lowest observed adverse effect level)

Collaboration between FARRP, TNO & Matthew Wheeler, US CDC [(NIOSH)] resulted in the development a new Stacked Model Averaging program. This incorporates 5 different statistical models.

(Weibull, Log Logistic, Log Normal, Log Double Exponential, General Pareto)

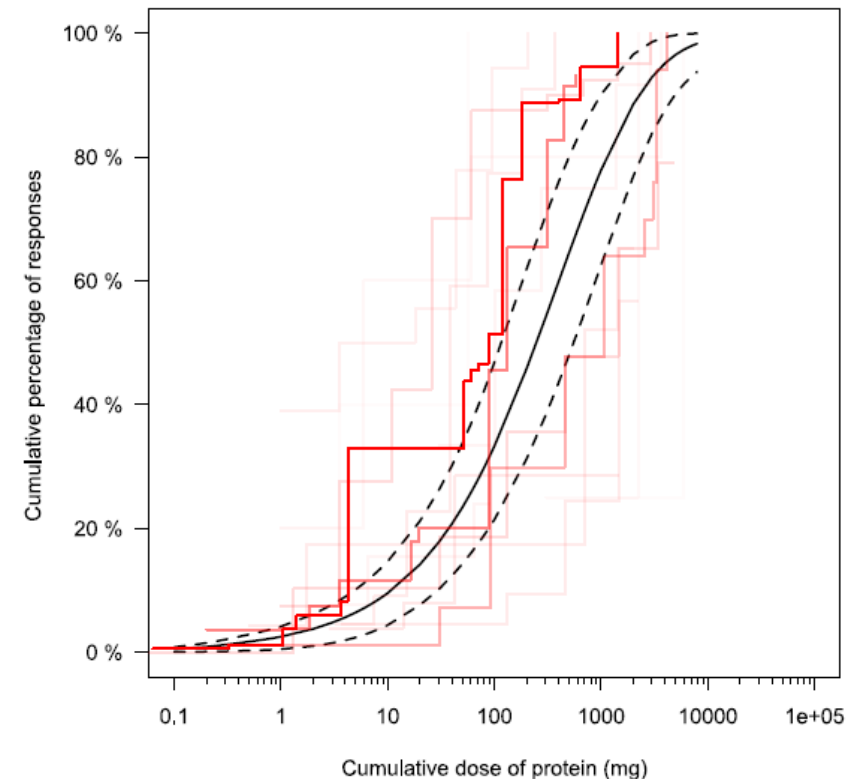
Better modelling accounts for study-to-study heterogeneity (different locations, clinicians etc)



VSEP: More clinical data, better modelling => new Reference doses

Stacked Model Averaging

- › Account for uncertainty in the survival curve by using a weighted average of the individual distributions based on “Goodness of Fit”
- › Account for Study-to-Study heterogeneity
 - › i.e. different locations, different protocols, different clinicians or nurses, etc
 - › However, n = 1 case studies are no longer able to be included in the dataset for use
- › Combine all knowledge to create an “averaged” distribution



VSEP Recommended Reference Doses (mg protein)

Allergen	No. of individuals	VITAL 2.0 Ref Dose (mg protein)	2019 VSEP Ref Dose (mg protein) [ED01] => VITAL 3.0	Change	2019 VSEP Ref Dose (mg protein) [ED05]
Egg	431	0.03	0.2	↑	2.3
Hazelnut	411	0.1	0.1	✓	3.5
Lupin	25	4.0	2.6	↓	15.3
Milk	450	0.1	0.2	↑	2.4
Mustard	33	0.05	0.05	✓	0.4
Peanut	1306	0.2	0.2	✓	2.1
Sesame	40	0.2	0.1	↓	2.7
Shrimp	75	10.0	25	↑	280
Soy (milk + flour)	87	1.0 (soy flour)	0.5	↓	10.0
Wheat	99	1.0	0.7	↓	6.1
Cashew	245		0.05		0.8
Celery	82		0.05		1.3
Fish	82		1.3		12.1
Walnut	74		0.03		0.8

ED = Eliciting Dose

ED01 = 1% of allergic consumers may have mild transitory reaction

ED05 = 5% of allergic consumers may have mild transitory reaction



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The VSEP Recommendation Impacts for VITAL[®]

Considerations for Allergen Bureau

- ✓ Need to strike a balance between blanket labelling and not labelling effectively
- ✓ Increasing global interest in VITAL so we need to ensure acceptance, integrity and trust until consensus emerges

Methodology

Moved to Stacked Model Averaging which gives more robust science

Reference Dose based on ED01

1% of allergic consumers could have a mild reaction

This allows the majority of allergic consumers to eat a normal diet

More consistent approach across all reference doses

Some reference doses will change, and new reference doses added



VITAL 2.0 to VITAL 3.0 Reference Dose Changes ED01 (mg protein)

Allergen	VITAL 2.0	VITAL 3.0
Reference Dose Increased ↑		
Egg	0.03	0.2
Milk	0.1	0.2
Shrimp	10	25
Fish	0.1	1.3
Reference Dose No Change ✓		
Hazelnut	0.1	0.1
Peanut	0.2	0.2
Mustard	0.05	0.05
Reference Dose Decreased ↓		
Lupin	4.0	2.6
Soy (Milk & Flour)	1.0	0.5
Wheat	1.0	0.7
Sesame	0.2	0.1
New Reference Dose		
Cashew (Pistachio)	XXX	0.05
Celery	XXX	0.05
Walnut (Pecan)	XXX	0.03



Transition VITAL[®] 2.0 to VITAL[®] 3.0

- VITAL 2.0 is the current version in VITAL Online & assessments should continue to be done using this
- *Current work in progress – target completion for launch at Oct 24 AGM:*
 - ✓ Enhance Online program update functionality to support VITAL 3.0 transition
e.g. Update All recipes, Summary of recipes by allergen status, Recipe change history.
 - ✓ Formalise VSEP recommendations report
 - ✓ Update the VITAL Guide
 - ✓ Update VITAL Training Package to include Risk Review website and VITAL 3.0
 - ✓ Update FIGAML (Food Industry Guide to Allergen Management and Labelling)
- So VITAL Online users should review the new Reference Doses,
and be aware of changes - increases, decreases, or new in the change to VITAL 3.0
- **It is important that the process of doing an overall risk review and a VITAL risk assessment will not change. The basis of the VITAL Program continues to be good risk review and good manufacturing processes (GMP).**



Allergen Risk Review Website

NOW LIVE



The website offers interactive infographics to help guide you through the process

Risk Review vs Allergen Management Definition



- Documented systematic approaches
- Identify allergen risks, allergen challenges in manufacturing
- Cover all aspects of supply chain

Similar but not the same

Allergen Management

the procedures, policies and practices contributing to the control of allergens within a food business.

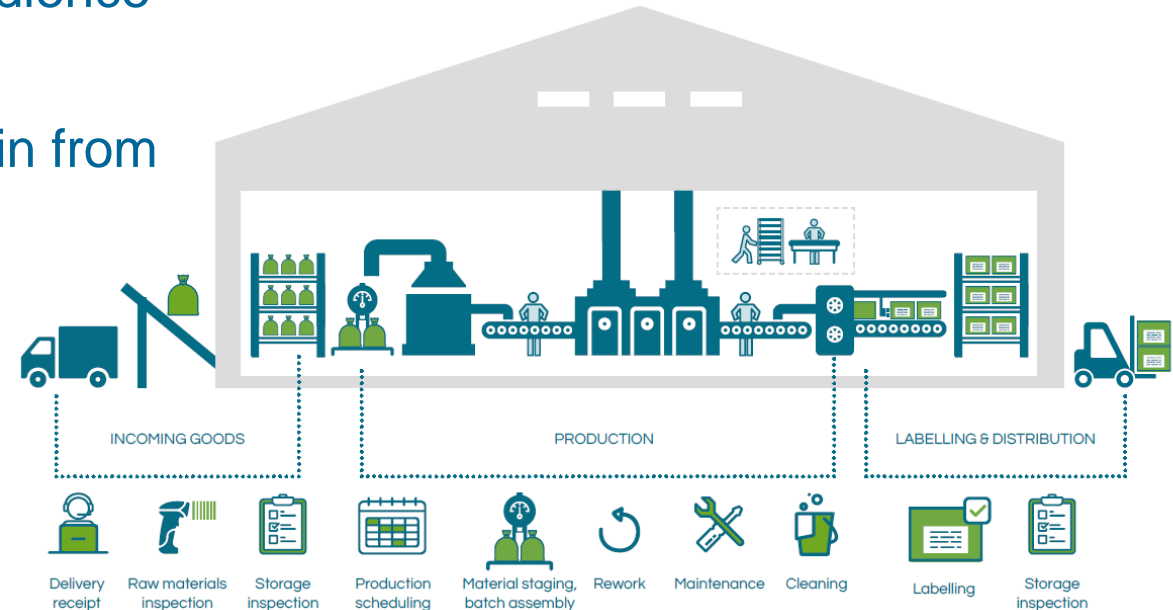
Risk Review

the process of thoroughly investigating the allergen status of a food.

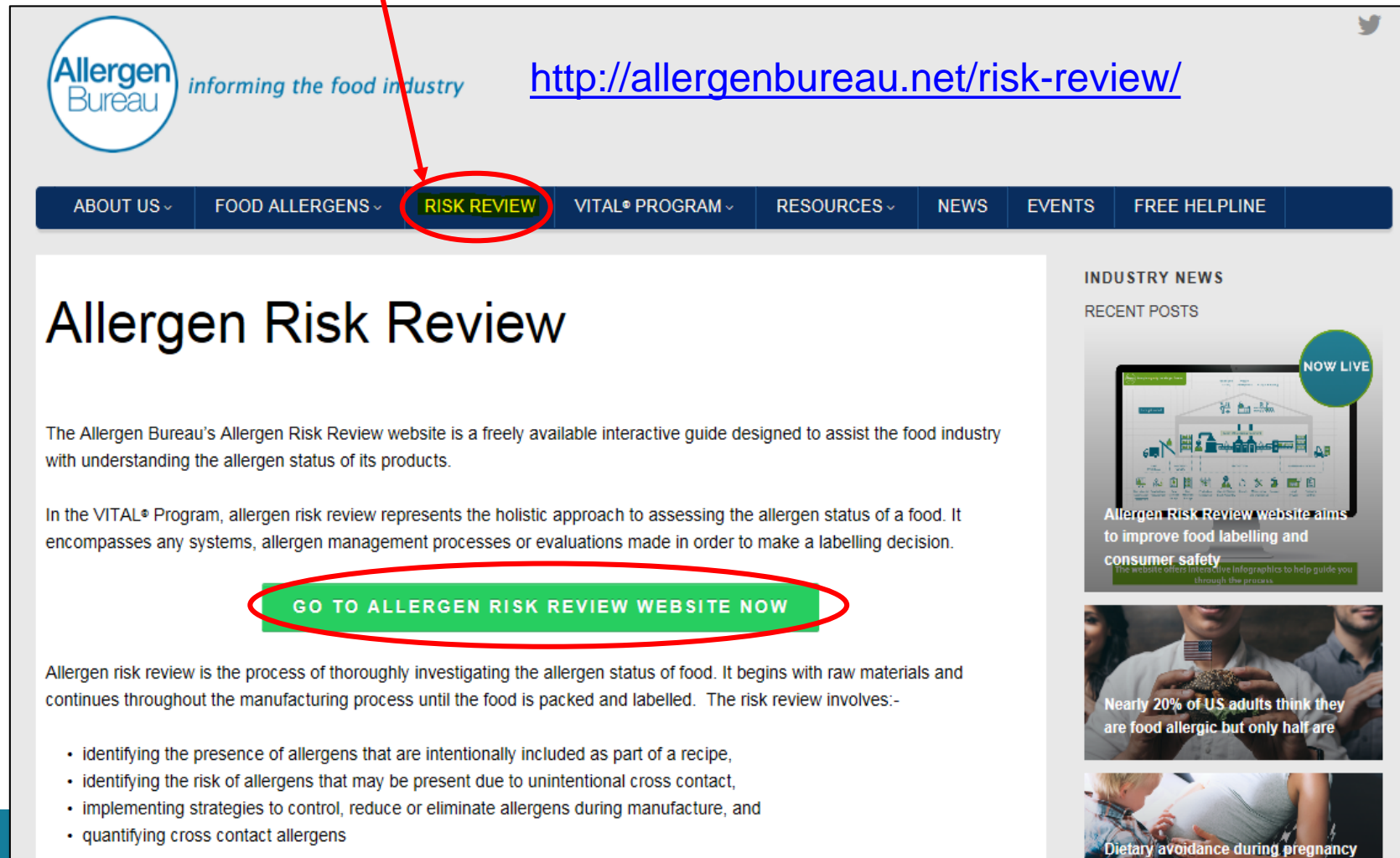
Allergen Risk Review Website

- ✓ Detailed guidance to investigate allergen status of a food.
- ✓ Interactive webpage accessible from the Allergen Bureau website to guide the user to do best practice Allergen Risk Review.
- ✓ Appropriate for a broad food industry audience (local, international, SME, corporations)
- ✓ Expandable to include entire supply chain from primary production to finished product.
- ✓ A flexible, living document.
- ✓ Lots of detail, but easy to use and focus on specific areas of concern.

We welcome your feedback!!



Allergen Risk Review website



The screenshot shows the Allergen Bureau website with the 'RISK REVIEW' link highlighted in the navigation bar. A red arrow points from the title 'Allergen Risk Review website' to this link. Below the navigation bar, the 'Allergen Risk Review' section is visible, featuring a description of the website's purpose, a 'GO TO ALLERGEN RISK REVIEW WEBSITE NOW' button (circled in red), and a list of topics covered in the risk review process. On the right side, there is a 'NOW LIVE' banner for the Allergen Risk Review website, a statistic about food allergies, and a section on dietary avoidance during pregnancy.

Allergen Bureau *informing the food industry*

<http://allergenbureau.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

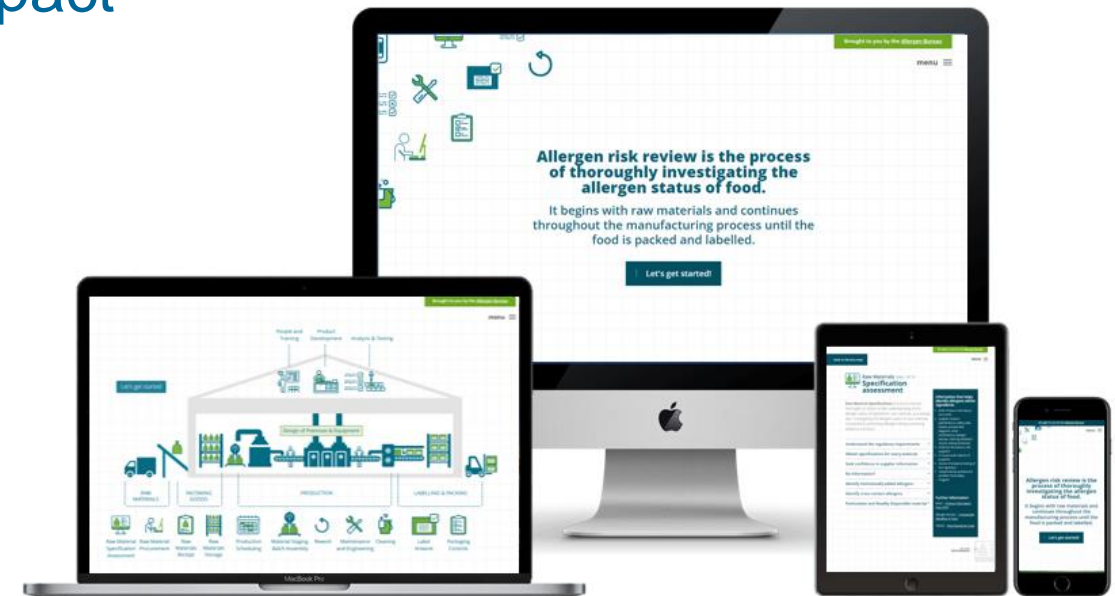
Allergen Risk Review website aims to improve food labelling and consumer safety

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

Dietary avoidance during pregnancy

Allergen Risk Review Website Advantages

- 👍 Freely available
- 👍 Provides information about allergen risk review
- 👍 Reassurance for decisions and assumptions
- 👍 Visual tool to show allergen impact
- 👍 Share within your organisation
- 👍 Inform international suppliers





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Further Allergen Bureau Working Groups & Recent Activities



VITAL® Standard - Certification

- VITAL Standard has been written in compliance with ISO 17065.
- Designed as an extra module for GFSI-recognised certified sites with HACCP based Allergen Management Programs.
- VITAL certification is product specific.
- Has been trialled by a few companies and Certification bodies to ensure it can be interpreted & applied consistently.
- Current work in progress to manage the VITAL Standard, including developing Industry & Auditor training/competency, and providing required support and agreements for Certification bodies.
- VITAL Standard to be launched at Allergen Bureau AGM – 24th Oct.
- Application to JAS-ANZ for accreditation to be determined based on industry need



**[HOT
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PRESS]**

VITAL® Standard – Certification & VITAL Mark

- Optional on-pack mark for VITAL Std certified products
- Must be placed next to ingredient list, as it is an endorsement of the integrity of the allergen labelling.
- Don't want VITAL mark to be misinterpreted as “*Allergen Free*”
- All VITAL Std certified products will be listed on Allergen Bureau website register.

**Sample only
Not approved yet**

CHOCOLATE BROWNIES
Naturally
Nutrition Facts
Serving Size: 1 package (4 brownies) (100g)
Servings per container: 4
Amount per Serving
Calories 439
Total Fat 14g
Total Crap 3g
Saturated Fat 0g
Trans Fat 0g
Cholesterol 0mg
Carbohydrate 16g
Dietary Fibre 8g
Sodium 170mg

Ingredients: SUGAR, WHEAT FLOUR, VINEGAR, CANOLA OIL, COCOA, MILK SOLIDS, EGG WHITE SOLIDS, WHOLE WHEAT FLOUR, GLYCEROL, OATMEAL, RAFFINOSE, CHICKEN FLAVOR, VANILLA EXTRACT, LEAVENING, SODIUM ACID PYROPHOSPHATE, BICARBONATE OF SODA, CORNSTARCH, MONOBASIC CALCIUM PHOSPHATE, BUCKWHEAT FLOUR, SPIRIT FLOUR, OAT GRAIN, WHEAT BRAN, MOLASSES, SEA SALT, SODIUM BICARBONATE. CONTAINS MILK, EGGS AND WHEAT. MAY CONTAIN TRACES OF SOY, TREE NUTS, PEANUT, SESAME SEEDS.

Ingredients: Whole grain rolled oats (63%), sugar, sunflower oil, Canadian maple syrup (2.5%), honey, salt, molasses, emulsifier (sunflower lecithin), raising agent (sodium bicarbonate), natural flavour.
Contains oat ingredients. May contain peanut, tree nuts and soy.

EXAMPLE ON COLOUR BACKGROUND

Ingredients: Wheat flour, sugar, salt, dextrose, emulsifier 123.
MAY BE PRESENT: SOY.



Risk Review Anomalies

AB, Ai Group & AFGC - working together on Risk Review Anomalies

Anomaly = Allergens known to be present at significant levels but not formulated as an ingredient & inappropriate to label as “**May be present XXX**”.

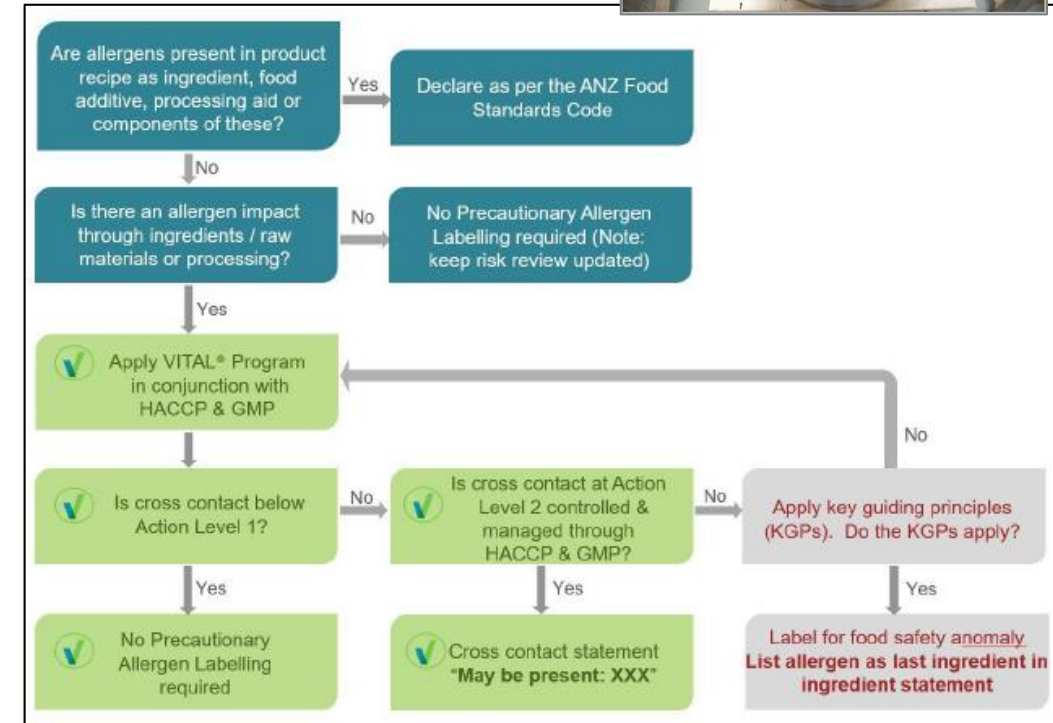
Occur where the process or environment cannot be altered or impacted through GMP.

e.g. Milk/Dairy in Dark Chocolate due to single conch

Collaborated with ANZ jurisdictions, Allergy NZ, and Allergy & Anaphylaxis Australia (A&AA).

Guiding principles & decision tree published to ensure appropriate labelling for the food allergic consumer.

<http://allergenbureau.net/about-us/allergen-bureau-working-groups/>



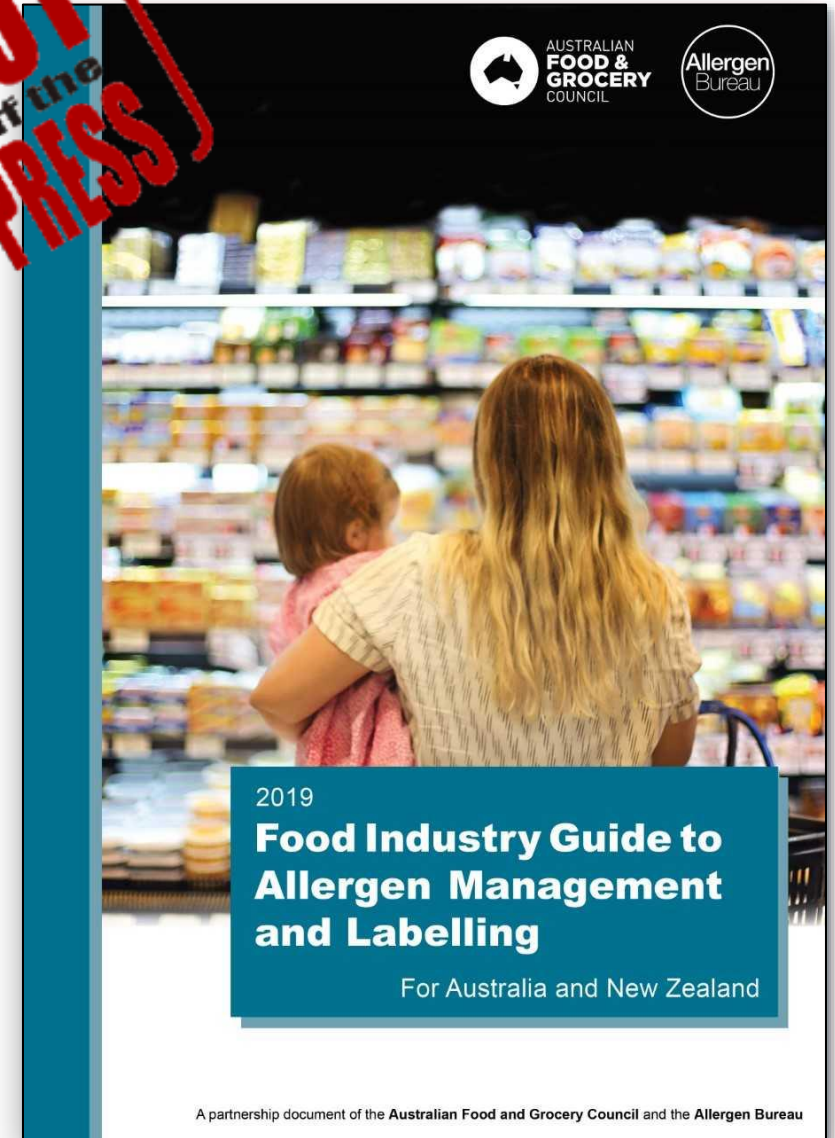
N.B. Declaring the allergen substance, ie milk, as the last ingredient in the ingredient list is not a substitute for appropriate risk review. Every attempt should be made to eliminate the allergen effectively.

Food Industry Guide to Allergen Management and Labelling

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Agricultural Cross Contact Working Group – Peanut in Chinese Garlic



*Copied from
presentation by
Joanne Price,
Langdon Ingredients*

Agricultural Cross Contact Working Group – *Gluten & Soy in Australian Maize*

Maize – Gluten and Soy



Grown in Australia for over 150 years.

Grown in Queensland and NSW

- Maize and Soy bean Summer crops
- Cereal crops (Wheat, Barley Winter crops)

Gluten

6 Years of Gluten batch testing per pallet

Majority <5ppm

Sporadic Gluten detections

Soy

Some of the contracted farms also grow soybean, not a rotational crop

Nil soy detection



*Copied from
presentation by
Joanne Price,
Langdon Ingredients*

Agricultural Cross Contact Working Group – Gluten in Turkish Oregano

Oregano – Gluten (Sampling)

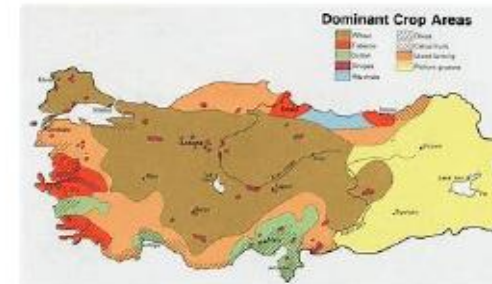
Oregano is derived from Turkey – Potential cross contact from field level wild wheat & barley

EU <20ppm gluten tolerance

Comparing composite versus individual sample testing

- Composite Sampling of the 1st and every 20th bag (composited sample of 10 bags) = 18ppm gluten
- Individual testing of the same lot no. revealed

>80ppm	78	64	26	19	18	<5
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Validation testing illustrated composite testing can dilute a result

Samples	Highest	Lowest	Composite
n=10	15ppm	<5ppm	7.5ppm
n=5	16ppm	11ppm	14ppm
n=10	19ppm	<5ppm	11.8ppm



Oregano – leaf , powder

*Copied from
presentation by
Joanne Price,
Langdon Ingredients*

Agricultural Cross Contact Working Group

- Food industry driven working group
 - Intent is to identify and communicate the challenges in this area
 - Provide guidance on assessing the risk
 - Provide guidance to determine labelling outcomes
 - Inform international suppliers
- Phase 1 and Phase 2
- Board approved April 2019



Agricultural Cross Contact Working Group

Phase 1 - Quick Wins for Industry

1. Update “Unexpected Allergens in Food” resource
2. Develop agricultural cross contact issue flow chart
3. Publish an informative paper
4. Guidance resource on ingredient allergen declarations from suppliers/growers
5. Sampling and testing guidance
6. Establish cross sectoral working relationship

Phase 2 - Overarching Guidance document

7. Agricultural allergen cross contact
Food Industry Management Guide

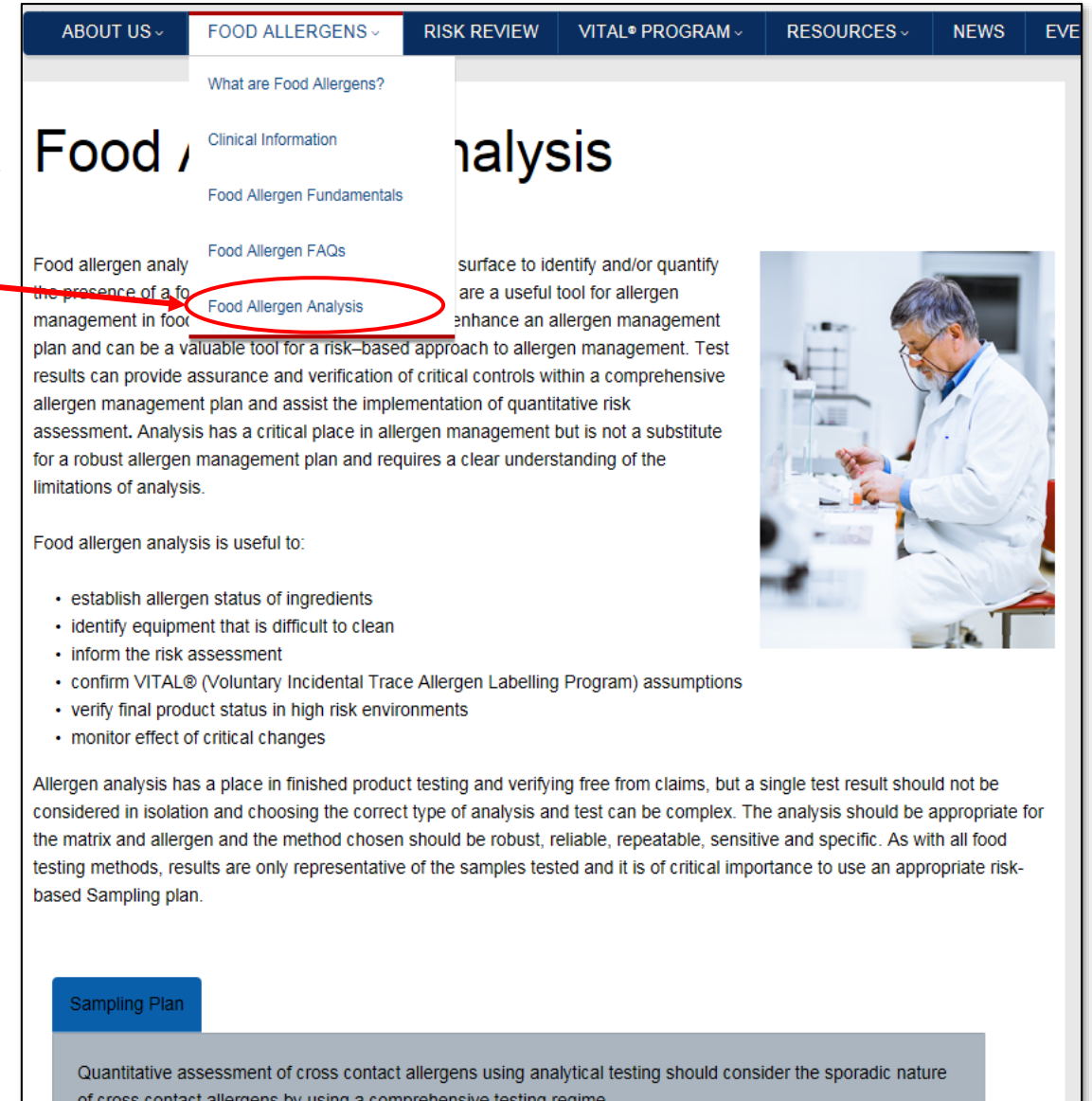


Food Allergen Analysis – Website Addition



Includes valuable guidance on:

- Sampling Plans
- Test Kits and their uses
- Types of Laboratory Analysis
- How to choose the most appropriate method
- What you should be asking your laboratory providers?



Awards for best practice allergen management

In conjunction with NZIFST & AIFST the Allergen Bureau provides the annual best practise in allergen management awards.

Based on contribution to a consistent, science-based approach to food allergen risk assessment, management and communication that guides industry best practice and assists allergen sensitive consumers to make informed choices based on label information.

Prize includes trans-tasman airfare and accommodation to attend AIFST/NZIFST conference



Congratulations to our 2019 Winners:

- ✓ *Australia:*
Sarah Proctor, Lion Dairy & Drinks
- ✓ *New Zealand :*
Sue Wheeler & Team, Woolworths NZ



Conclusion

✓ Allergen Bureau continues to respond to stakeholder needs

- Working groups
- Development of resources to support allergen management & VITAL
- eNews, Helpdesk, Website

✓ Collaborate with key stakeholders

- [National Allergy Strategy](#)
- [Allergen Collaboration \(FSANZ\)](#)
- [Allergy NZ](#), [Allergy & Anaphylaxis Australia \(A&AA\)](#)
- [Australian Food & Grocery Council](#)
- [Food Technology Association of Australia](#) (SME Project)
- FSANZ & Codex consultation pieces

✓ International Collaborations – South Africa, South America and more...





informing the food industry

For further engagement & information

- Visit the Allergen Bureau website www.allergenbureau.net
- Join us & enjoy the benefits of the Allergen Bureau membership
www.allergenbureau.net/about-us/join-us/
- Subscribe to our free monthly Allergen Bureau eNews www.allergenbureau.net/news/
- Access the free Allergen Bureau Helpline
 - ✓ email: info@allergenbureau.net
 - ✓ Phone: +61 437 918 959 (International)
- Secretariat (Dr Tom Lewis & Ray Murphy)
- VITAL[®] Coordinator (Georgina Christensen) & Support (Lisa Warren)



Thank you for listening...
Any questions?



Examples of **inappropriate** approach to managing allergens

- ✗ Example 1: Allergen analysis of finished product (solely) used to determine cross contact allergen presence and quantification

Limitations to allergen analysis mean that allergen may be in the product but it cannot be identified using the test applied or may be at a level lower than the sensitivity of the test.

- ✗ Example 2: Declaring every allergen on site in a precautionary allergen statement despite excellent verification and validation of line showing no cross contact

This is likely to result in over-declaring allergens. This type of labelling is unhelpful for consumers and perpetuates the claim from those with food allergies that food companies over-label to protect themselves. This diminishes the overall effectiveness of allergen labelling.