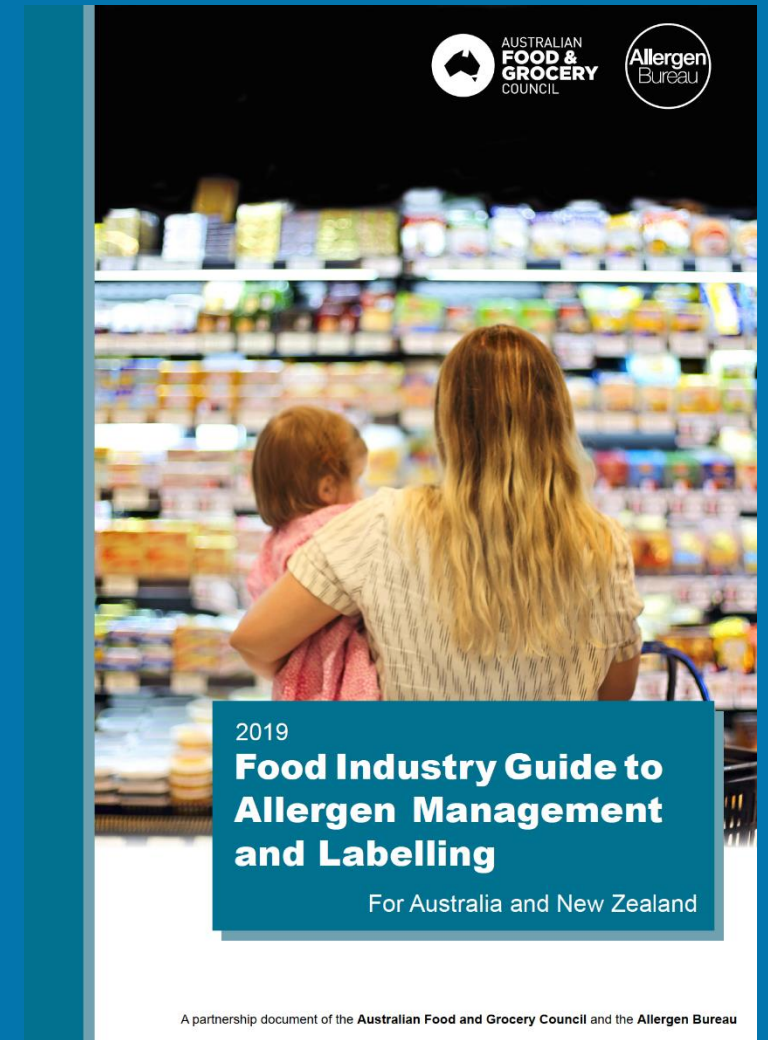


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Food Industry Guide to Allergen Management and Labelling

AFGC & Allergen Bureau

VITAL 3.0 and Allergen Management Guidance
Breakfast Seminars, 2020





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AFGC – Who we are:

Leading national organisation representing Australia's food, drink and grocery manufacturing industry.

200+ companies, subsidiaries and associates which constitutes in the order of 80 per cent of the gross dollar value of the processed food, beverage and grocery product sectors.



Nestlé



Unilever



MARS

goodman fielder
our homegrown food company



LION

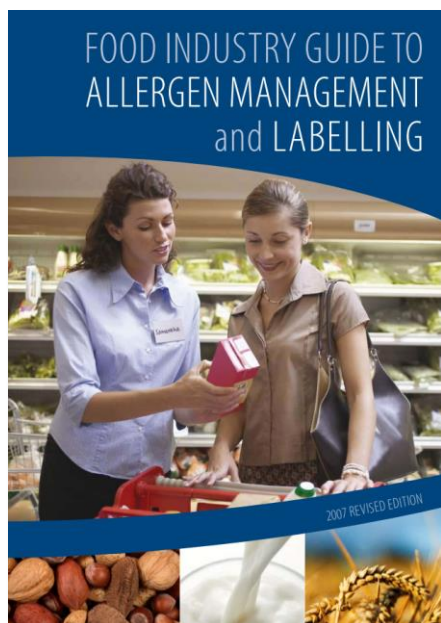


GWF





The Journey to 2019



2007

The ANZ Food Standards Code was introduced in 2002 requiring declaration of allergens.

AFGC guidance was developed and is still used today.

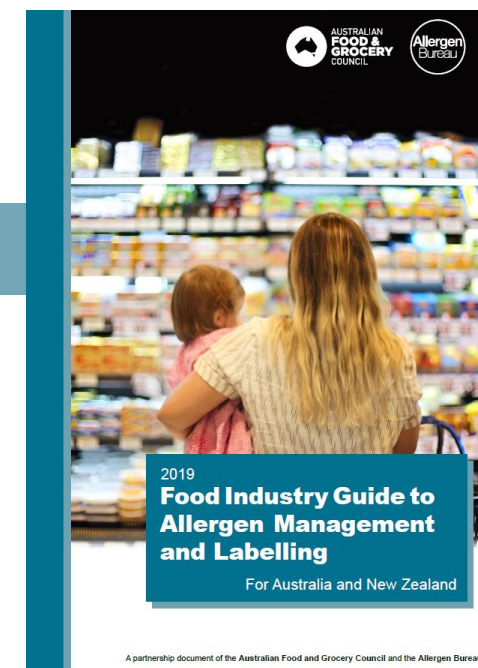


2019

But the environment has changed:

Increased incidence of allergic disease

Different regulatory requirements e.g. Exemptions 2016, Lupin 2017

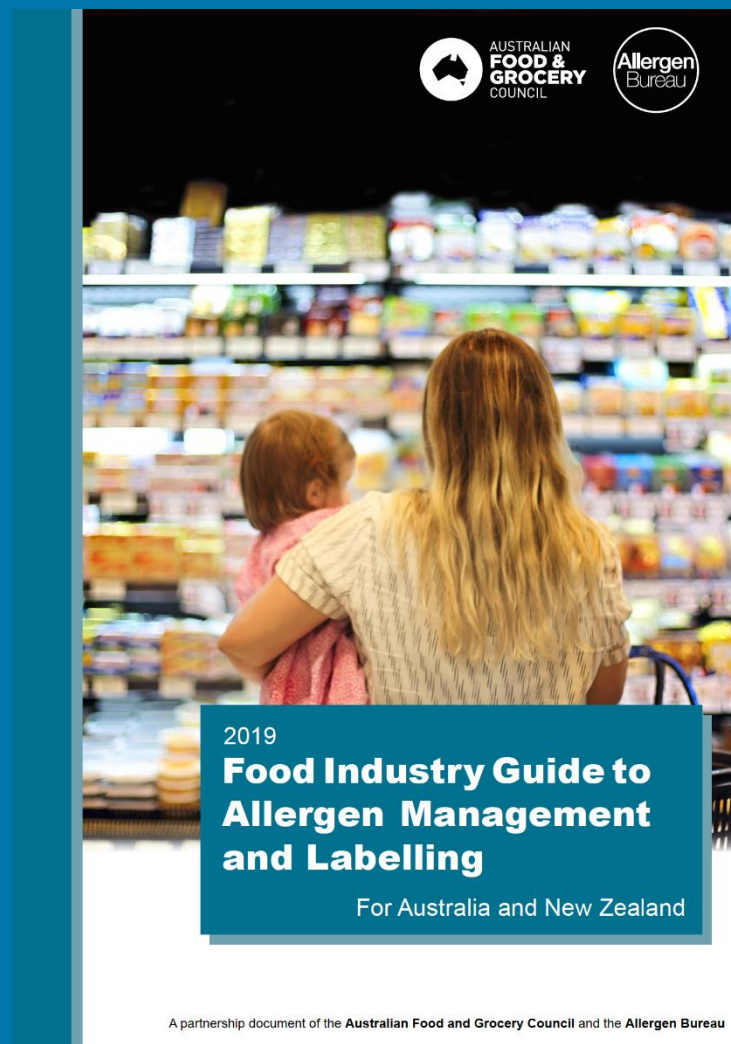




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What's new?

- Communicating allergen status change
- Differentiation of similar products
- Food recall case studies
- Label artwork approval
- NZ content
- Customer contact guidance
- Electronic publish only
- Referral to [Allergen Risk Review website](#)



Packaging Differentiation

When designing packaging artwork, consideration should be given towards providing a visual cue that distinguishes between products of different allergen status. An example is a range of pasta sauces that share the same branding. This range consists of both cream and tomato-based variants which have different allergens. Labels bearing clear visual differences can help shoppers recognise the variants more easily, reducing the chance of an incorrect purchase.

A company should review each product range and identify the potential for consumer confusion. Consider whether there are similar products with different allergen status within a product range, their proximity in-store and/or online, and whether products can be readily substituted for each other.

If determined to be of moderate to high potential for consumer confusion, then the company should differentiate the products using measures such as:

- colour of packaging and label
- using other visual cues such as ingredient pictures
- creating differences in visual appearance of the product (within the package)
- consistent location of variant descriptor across the range.

Alternatively, consider only using formulations that harmonise the allergens across similar products.

A food packed in different formats should have the same allergen status and declaration

Consumers may assume that the allergen status of a food is always the same if the same food is sold in various packaging formats.

In commercial operations, more than one pack format for a product may exist due to variations in consumer demand or formulation for different markets. These variations should be managed to ensure consistency (such as allergen status) to avoid confusion and result in a consistent allergen declaration across all variations.

Businesses should consider the potential for consumer confusion when determining the allergen status of a product.

It is important to ensure that the allergen status is clearly visible on the packaging.

Communicating Change in Allergen Status (4.4)

- Allergen status change is to be avoided but it happens!
- Suggested consumer alert approaches:
 - changing a product's name or descriptor
 - changing colours or other visuals on the label
 - including a temporary flash or icon alerting the allergen change.

Additionally other forms of communication (online shopping, in-store demos & social media) are considered.

- Watch out for allergen removal and mix of products on-shelf during transition.

The food industry should not assume that foods that do not contain added cereals containing gluten are gluten free. The presence of cereal traces, cereal cross contact, highly refined cereals or products derived from cereals may not constitute gluten free. An example is the presence of cereals into other grains or legumes as a result of agricultural co-mingling.

Claims, and a 'low lactose' claim are examples of claims, the conditions of which are set out in Schedule 4 of the Code. In addition, a lactose free food must not contain lactose. The term 'dairy free' is a claim that should not be used. A 'dairy free' claim should not be used where the manufacturer has not taken steps to ensure the product does not contain milk or milk products that are a cross contact allergen.

Businesses should further consider the potential for consumer confusion when using visual cues to alert consumers to allergen status changes. Visual cues should be taken to ensure they do not give the impression of a product being allergen free. A wheat-free product containing gluten-free ingredients may imply the product is necessarily allergen-free. It is necessary to consider the allergen presence in a product when making a more informed decision than might otherwise be made.

COMMUNICATION

Businesses should consider the potential for consumer confusion when communicating the allergen status of a product.

Change in Allergen Status of a Product

Businesses should consider the potential for consumer confusion when communicating the allergen status of a product. Variations in ingredient supply, production process, line or facility, can result in a change to the allergen status of a food. When a change occurs, updating the allergen declaration on the label is required. However, without careful reading of

the label it may not be obvious to a consumer that the allergen status of the food has changed. Additionally, a consumer may not realise that the original product and the reformulated one may be in a store, or in their pantry, at the same time.

Clearly communicating any changes to the allergen status of a product on the front of the pack can assist with alerting consumers. Possible approaches to altering the label or package so that it is visually different include:

- changing a product's name or descriptor
- changing colours or other visuals on the label
- including a temporary flash or icon alerting the allergen change.

Figure 3: Examples of graphics that indicate a change to allergen status



In addition to front of pack communications, consideration should be given to alerting consumers with food allergy through patient support organisations such as Allergy & Anaphylaxis Australia (A&AA) or Allergy New Zealand, and Coeliac Australia/New Zealand. These organisations can notify their members of the nature and timing of the change to support the company. Information can also be communicated via a company website or social media.

When determining the duration of an alert, consider shelf life and stock in trade practices (e.g. first-in, first-out).



Packaging Differentiation

When designing packaging artwork, consideration should be given towards providing a visual cue that distinguishes between products of different allergen status. An example is a range of pasta sauces that share the same branding. This range consists of both cream and tomato-based variants which have different allergens. Labels bearing clear visual differences can help shoppers recognise the variants more easily, reducing the chance of an incorrect purchase.

A company should review each product range and identify the potential for consumer confusion. Consider whether there are similar products with different allergen status within a product range, their proximity in-store and/or online, and whether products can be readily substituted for each other.

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Alternatively, consider only using formulations that harmonise the allergens across similar products.

A food packed in different formats should have the same allergen status and declaration

Consumers may assume that the allergen status of a food is always the same, even if the food is sold in various packaging formats.

In commercial operations, there may be more than one pack format for a product. Variations in colour, shape and size of the pack, or the formulation of the product, may be manufactured (such as different sizes) and result in different allergen status.

Businesses should consider the allergen status of the product when it is sold in different formats.

If a product is sold in different formats, the allergen status should be clearly communicated on the packaging.

Differentiating Similar Products (4.4)

- Best practice is to have same allergen status for similar products e.g. different pack sizes or format.
- However, not always possible so if there is risk of confusion/mistake when purchasing, make every effort to distinguish products:
 - colour of packaging and label
 - using other visual cues such as ingredient pictures
 - creating differences in visual appearance of the product (within the package)
 - consistent location of variant descriptor across the range.

The food industry should not assume that foods that do not contain added cereals containing gluten are gluten free. The presence of cereal traces, cereal cross contact, highly refined cereals or products derived from cereals may not constitute gluten free. An example is the presence of cereals into other grains or legumes as a result of agricultural co-mingling.

Claims, and a 'low lactose' claim are examples of claims, the conditions of which are set out in Schedule 4 of the Code. In addition, a lactose free food must be clearly labelled. The term 'dairy free' is not a 'dairy free' claim should be used where the manufacturer has not determined that the product does not contain milk or milk derivatives as a cross contact allergen.

Businesses should further consider the allergen status of products used by consumers. Care should be taken to avoid giving the impression of a product being gluten free. A wheat-free product may imply the presence of gluten. Additionally, to avoid confusion, the allergen presence should be clearly communicated in a way that is not misleading. Making a more consistent allergen status declaration than might otherwise be expected.

COMMUNICATION

Businesses should consider the allergen status of products on consumer facing packaging.

Allergen Status of

Businesses should consider variations in ingredient supply, processing, line or facility, can affect the allergen status of a food. The allergen declaration on the label should be consistent, without careful reading of

the label it may not be obvious to a consumer that the allergen status of the food has changed. Additionally, a consumer may not realise that the original product and the reformulated one may be in a store, or in their pantry, at the same time.

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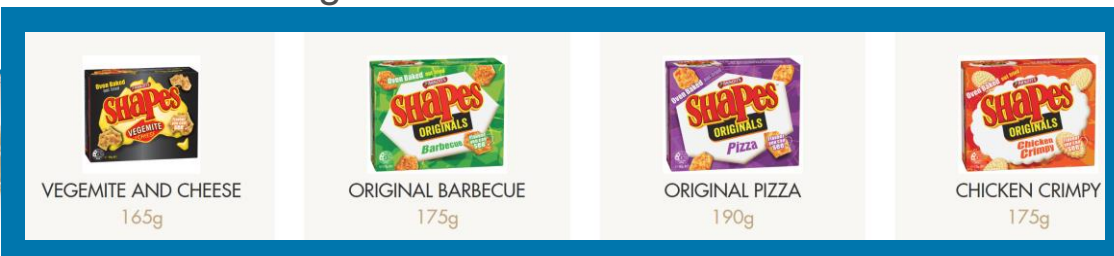
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When determining the duration of an alert, consider shelf life and stock in trade practices (e.g. first-in, first-out).



5. FOOD RECALLS

FSANZ describe a food recall as an action taken by a food business to remove unsafe food from distribution, sale and consumption¹⁷. A consumer level food recall involves the removal of unsafe or unsuitable food from all points in the production and distribution networks including any affected food in the possession of consumers. The public must be informed of a consumer level recall and this usually involves the use of media such as newspaper advertisements, point of sale notices and publication of information about the recall by FSANZ and/or MPI on their website and social media sites.

Australian food recall data is collected and collated by FSANZ to identify common trends and problems occurring across the food industry in Australia. In the last decade, most recalls (30% of all) have been conducted due to undeclared allergens (266 recalls in total). During this time, the most common allergen related recall was undeclared milk (30% of all allergen related recalls), the second being undeclared peanut (18% of all allergen related recalls).

Figure 4: Undeclared allergen recall trends



Cost Impact of a Food Recall

Undertaking a food recall is a major commercial expense, with the additional cost of lost sales and brand damage. Costs incurred as a result of a food recall may be due to:

- potentially ceasing production
- loss of time when investigating the cause
- cost to recall the product from distribution and/or point of sale
- loss of sales
- disposal of the product
- disposal of incorrect product
- communicating the recall
- loss of reputation with retailers
- restocking
- legal action.

Undeclared food allergen recalls have been steadily increasing over the last ten years in Australia and over the last five years in New Zealand.

The most common reasons for undeclared allergen recalls coordinated by FSANZ are:

- lack of skills and knowledge
- supplier verification issues
- packaging errors
- accidental cross-contamination
- finished product

The Ministry for Primary Industries (MPI) publishes food recall data on their website. This data is shared with the New Zealand Food Safety Authority (FSA).

Further information is available on the FSA website.

Food Recall (5)

High proportion of food recalls in ANZ due to errors in allergen declaration.

Updated guide covers:

- Food Recall Plans
- Mock Recalls
- Recall Communication
- Cost Impact of a Food Recall
- Available resources

Have a Food Recall Plan in Place

All food companies should have a documented Food Recall Plan which can be implemented if a food safety issue is identified. The food recall plan should include an allergen related communications plan with a designated, responsible person identified to provide information to customers, consumers, and regulatory authorities in a timely manner. The plan should include a list of allergen related stakeholder contact list.

Developing a Food Recall plan for

is available on the [FSANZ website](#) and on the [MPI website](#).

The [Industry Recall Protocol](#)

provides information on

the crisis management

process as an [ANZ Product](#)

industry-agreed

process for the withdrawal of

products from New Zealand

Mock Recall

Conducting a mock recall assists with identifying gaps demonstrating the ability to withdraw and recall affected product, contacting relevant customers, and maintaining records of these incidents. The traceability system should be tested at least annually with results documented and corrective actions implemented. Traceability should be achievable within two to four hours.

Recall Communication

In the event of a product recall due to the presence of an undeclared allergen, it is important that companies communicate information in a timely manner. In addition to communication via the required recall notification protocols, other channels such as the company website and social media should also be considered. Online solutions are also available to both Australia and New Zealand that assist with communicating food recalls and withdrawals to trading partners and regulators.

All food companies should have a documented Food Recall Plan which can be implemented if a food safety issue is identified.

Allergen Risk Review

Allergen Management

Documented systematic approaches

Identify allergen risks, allergen challenges in manufacturing

Cover all aspects of the supply chain

Similar but not the same



Allergen Risk Review

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



Allergen Management

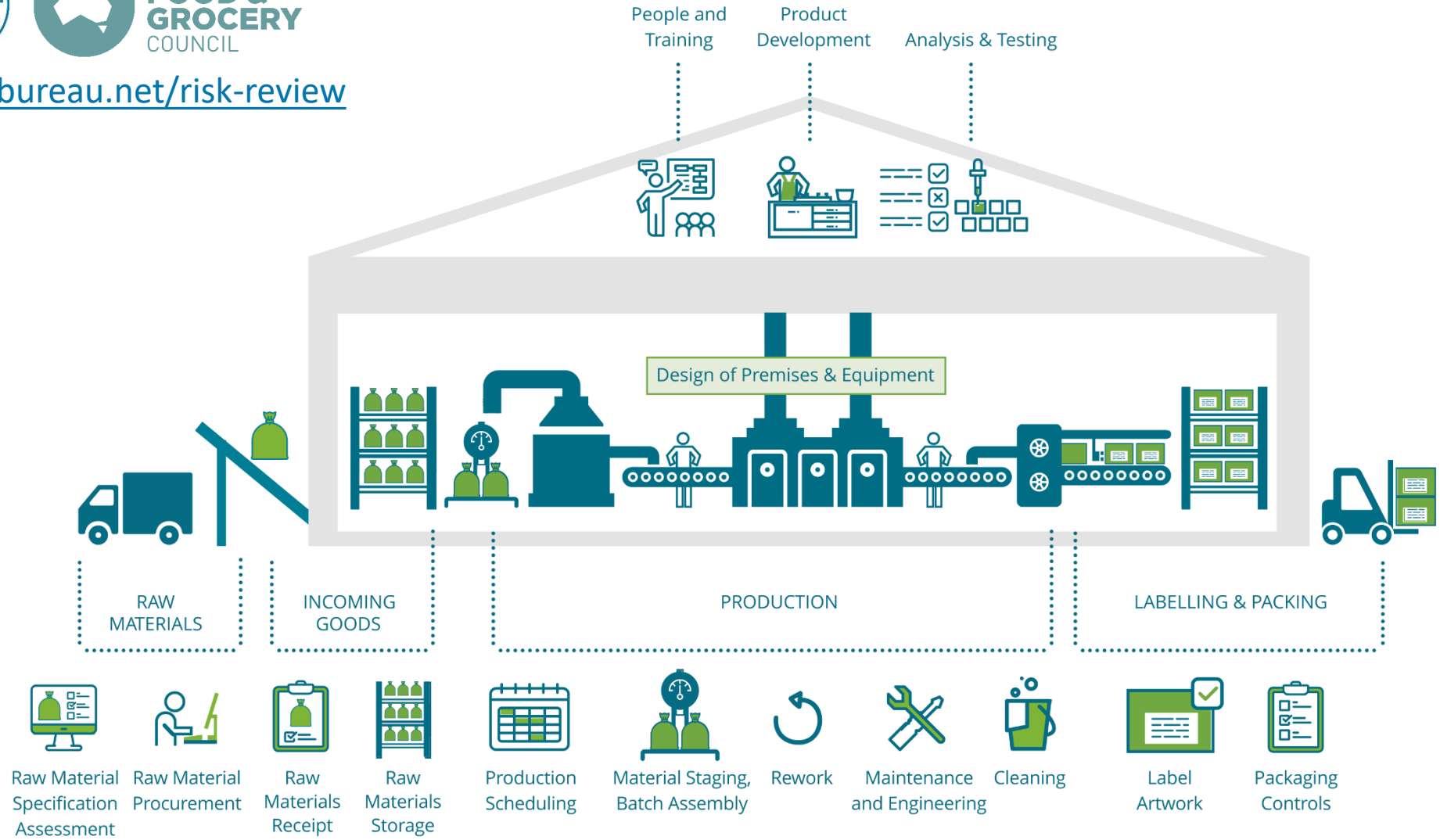
the procedures, policies and practices contributing to the control of allergens within a food business.





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allergenbureau.net/risk-review





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Getting started

Have an allergen management program in place.

An **Allergen Management Program (AMP)** is a documented systematic approach towards identifying and controlling allergens in a food facility. It is applicable to all levels and all areas of a food company and sets the approach to the control and management of allergens.

An **allergen risk review** can assist in identifying areas that need to be included while developing an AMP or when updating one that is already in place. An allergen risk review requires the support of many parts of the business including management. It should be repeated regularly (such as when HACCP reviews are conducted) as well as after any changes to staff, suppliers, equipment, materials, scheduling, recipes, sites etc and the AMP should be updated accordingly.

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Entire Project Step 13 of 15

People & Training

Trained staff who are aware of food allergen risks can support a business in successfully controlling and managing food allergens. Staff from all parts of the business (including contractors and temporary staff) should understand their role in allergen management. Encourage staff to look for allergen risks and have processes in place so that the risks are addressed.

Training

Key training considerations

Management and staff

Allergen Management Program (AMP)

Management commitment and review – A documented AMP should be in place which is authorised by senior management and communicated to all staff. Authorised personnel are responsible for development and implementation of AMP which should be reviewed at least annually or when changes are made.

People Management – Documented procedures for the management and control of personnel that includes personal protective equipment (PPE), personal hygiene, meals, movement, facilities, staff changes and visitors should be in place.

Training – The AMP will include processes where new staff are provided with induction training and current staff undertake annual refresher training in allergen management.



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Production Step 9 of 15 Cleaning

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 ▼

Cleaning validation and verification ▼

Risk review considerations ▼

Allergen Management Program (AMP) ▲

An effective AMP will include procedures in place for:-

Cleaning – Procedures to manage raw material spills, and for cleaning the facility, equipment, and tools to prevent allergen cross contact are in place. Cleaning validation and verification is monitored and reviewed.

Waste – Procedures in place to control waste product and packaging that contain allergens. For example, a package that stored a milk based ingredient, should not be reused for a different ingredient that does not contain milk.



Incoming Goods Step 4 of 15

Raw materials storage

Raw materials and **ingredients should be stored** such that allergen cross contact is prevented. Processes to manage spillages of ingredients in storage and returns to warehouse should be in place.

Storage location and ingredient segregation ▼

Consider the nature of the allergen ▼

Spillages and returns to warehouse ▼

Changes to the allergen status of a material ▲

If the allergen status of a raw material or ingredient changes, consider the following:

- Requirement for prior communication and allowance for appropriate time for setting up warehouse and incoming/outgoing goods.
- The implications for transit, goods receipt, internal transport.
- Volumes required to ensure appropriate space within storage and staging areas.
- Labelling and signage.

Allergen Management Program (AMP) ▼



Where to get the Guide



Kim Tonnet
kim.tonnet@afgc.org.au

Website afgc.org.au/industry-resources/food-labelling-and-allergen-guide



Allergen Bureau
info@allergenbureau.net

Website allergenbureau.net/resources

