

# Allergen Bureau

## PEALing the PAL

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Informing the  
food industry



- 
- Allergen**  
Bureau



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# Cross Contact

A residue or other trace amount of a food allergen that is **unintentionally** incorporated into another food.

Cross contact sources can be from

- ingredients,
- raw materials,
- personnel,
- inadequate cleaning of equipment,
- or concurrent and/or co-located plants.

# Precautionary Allergen Labelling (PAL)

- Voluntary
- Important to help consumers know what food is safe for them to eat
- Most helpful when applied consistently across industry

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 that 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: ...



# The VITAL<sup>®</sup> Program

A standardised allergen risk assessment process for food industry.

Provides a consistent methodology for food industry to **assess the impact of allergen cross contact** and provide appropriate precautionary allergen labelling on their products.



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

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**I**NCIDENTAL  
**T**RACE  
**A**LLERGEN  
**L**ABELLING

# The Basics



Prerequisite: Allergen Management Plan

1. Identify cross contact allergens.
2. Eliminate cross contact allergens.  
If not possible reduce them to the lowest practicable level and manage and control them at this level.
3. Quantify cross contact allergens.
4. Compare with the thresholds in VITAL Program.
5. Use PAL where required.

**May be present: allergen x, allergen y.**

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# Thresholds in the VITAL Program

## Action Level 1

low concentration of the relevant allergen under evaluation, low chance of adverse reaction

**no PAL statement is required**

## Action Level 2

significant concentration of the relevant allergen under evaluation, significant chance of adverse reaction

**PAL statement is required**

# When the VITAL Program is applied

- Cross contact is present at the lowest practicable level and is controlled and managed at that level
- Cross contact has been quantified and compared with scientifically determined threshold
- Consistent labelling
- Commitment to allergen management and labelling

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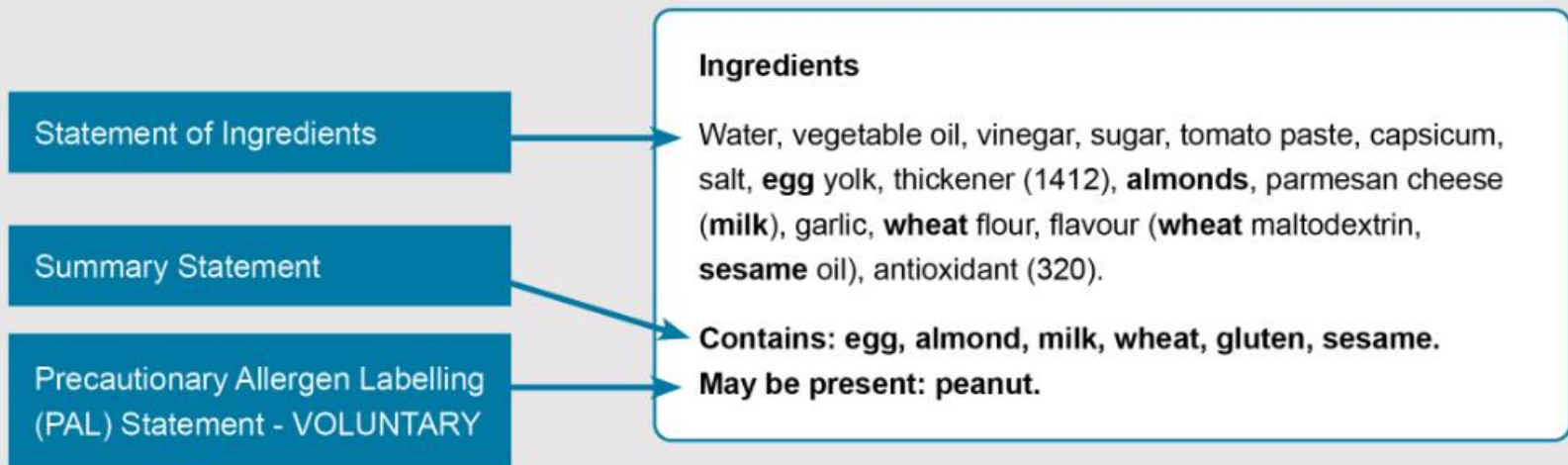


The Food Standards Code influences the VITAL Program allergen labelling guidance

- ✓ Font and format
- ✓ Terminology
- ✓ Individually name cereals containing gluten and tree nuts
- ✓ Focus on gluten as a key substance

Examples shown in this presentation are to provide guidance

# Recommended Labelling Format – PAL Statement



“May be present: allergen x, allergen y.” is recommend in conjunction with the VITAL Program

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# Recommended Labelling Format – PAL Statement

## Ingredients

Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, **egg** yolk, thickener (1412), **almonds**, parmesan cheese (**milk**), garlic, **wheat** flour, flavour (**wheat** maltodextrin, **sesame** oil), antioxidant (320).

**Contains: egg, almond, milk, wheat, gluten, sesame.**

**May be present: peanut.**

## FORMAT

- **May be present:**  
**allergen x, allergen y.**
- Bold font
- Same typeface and text size as used for the required names in the Statement of Ingredients

# Recommended Labelling Format – PAL Statement

## Ingredients

Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, **egg** yolk, thickener (1412), **almonds**, parmesan cheese (**milk**), garlic, **wheat** flour, flavour (**wheat** maltodextrin, **sesame** oil), antioxidant (320).

**Contains: egg, almond, milk, wheat, gluten, sesame.**

**May be present: peanut.**

## LOCATION

- Separately from, but next to, the summary statement
- Not between the Summary Statement and the Statement of Ingredients
- Where there is no Summary Statement, then place below the Statement of Ingredients

# Recommended Labelling Format – PAL Statement

## Ingredients

Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, **egg** yolk, thickener (1412), **almonds**, parmesan cheese (**milk**), garlic, **wheat** flour, flavour (**wheat** maltodextrin, **sesame** oil), antioxidant (320).

**Contains: egg, almond, milk, wheat, gluten, sesame.**

**May be present: peanut.**

## TERMINOLOGY

- Required names set out in Column 3 of the table to section S9-3 (FSC) + 'gluten' where present
- Declare individual allergens wherever possible
- Use singular terms

# Required Names

- Crustacean
- Egg
- Fish
- Milk
- Peanut
- Mollusc
- Sesame
- Soy
- Lupin

**May be present:  
egg.**

**May be present:  
fish.**

**May be present:  
soy.**



# Required Names - Groups

## Cereals

- Barley, gluten
- Oats, gluten
- Rye, gluten
- Wheat  
(if gluten is present, gluten)

## Tree nuts

- Cashew
- Pistachio
- Walnut
- Pecan
- Almond
- Brazil nut
- Hazelnut
- Macadamia
- Pine nut

# Investigate allergen status of the food

- ALLERGEN RISK REVIEW is extremely important!
- Do a thorough investigation of the sources of cross contact e.g.
  - ask and document questions to suppliers
  - complete a thorough, cross-functional assessment of allergens on-site
- Be able to defend allergen label: ask “have we done everything that is possible to manage this cross contact allergen”
- Allergen Bureau Allergen Risk Review website



# Example 1: Rice Crackers

## Ingredients

Rice (95%), sunflower oil (antioxidant (319)), salt.

**May be present: wheat, gluten.**

## NOTES

- No Summary Statement: PAL statement is directly below the ingredient list.
- Wheat cross contact – also add 'gluten' where relevant.

# Example 1: Rice Crackers

## Ingredients

Rice (95%), sunflower oil (antioxidant (319)), salt.

**May be present: barley, gluten.**

## NOTES

- No summary statement: PAL statement is directly below the ingredient list.
- Barley cross contact — also add 'gluten' where relevant.

# Example 1: Rice Crackers

## Ingredients

Rice (95%), sunflower oil (antioxidant (319)), salt.

**May be present: oats, gluten.**

## NOTES

- No summary statement: PAL statement is directly below the ingredient list.
- Oats cross contact — also add 'gluten' where relevant.

# Example 1: Rice Crackers

## Ingredients

Rice (95%), sunflower oil (antioxidant (319)), salt.

**May be present: rye, gluten.**

## NOTES

- No summary statement: PAL statement is directly below the ingredient list.
- Rye cross contact – also add 'gluten' where relevant.



# Example 2: Barley stew

## Ingredients:

Water, potato, carrots, celery, **barley**, **oats**.

**Contains: gluten.**

**May be present: wheat.**

## NOTES

- Gluten is in the Summary Statement.
- Wheat cross contact — do not repeat 'gluten'.

# Example 3: Muesli bar

Ingredients:

**Oats**, glucose syrup, **almond** meal, honey, coconut.

**Contains: gluten, almond.**

**May be present: tree nuts (cashew, walnut).**

## NOTES

- Declare individual tree nuts
- Consider: is this clear for the consumer?

Ingredients:

**Oats**, glucose syrup, **almond** meal, honey, coconut.

**Contains: gluten, almond.**

**May be present: cashew, walnut.**

# Example 4: Salad sprinkle

Ingredients:

**Sesame** seeds, pepitas, **pine nuts**, **soy** sauce.

**Contains:** sesame, pine nut, soy.

**May be present:** almond, Brazil nut, cashew, hazelnut, macadamia, pecan, pistachio, walnut.

## NOTES

- Risk assessment has identified 8 tree nuts
- Is this clear for the consumer?

# Example 4: Salad sprinkle

Ingredients:

**Sesame** seeds, pepitas, **pine nuts**, **soy** sauce.

**Contains:** sesame, pine nut, soy.

**May be present:** tree nuts.

## NOTES

- Optional – using “tree nuts” may be appropriate to communicate the risk to the consumer.

# PAL Statements

- Do not use PAL statements in lieu of GMP and HACCP
- Ensure PAL statement is logical and does not contradict the Statement of Ingredients or Summary Statement
- PAL statements should communicate clearly to a consumer



# PAL Statements

- Where the VITAL Program is not applied, consider using “**May Contain**”
- Examples in the presentation are for discussion – we continue to develop advice around PAL statements based on your questions and comments





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## Voluntary Incidental Trace Allergen Labelling

The Allergen Bureau's VITAL<sup>®</sup> (Voluntary Incidental Trace Allergen Labelling) Program is a standardised allergen risk assessment process for food industry.

The Food Industry Guide to the  
**VOLUNTARY  
INCIDENTAL  
TRACE ALLERGEN  
LABELLING  
(VITAL®) PROGRAM**

Version 3.0

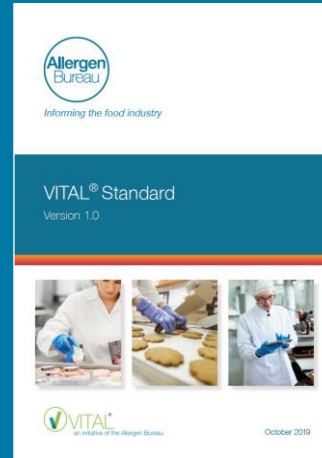


April 2021

**PEAL  
updated**

# VITAL Program Version 3.0

and supporting resources



# VITAL Online Version 3.1.4



VITAL User Group  
vital@allergenbureau...

Dashboard

Ingredients

Processing Profiles

Recipes

Libraries

Reports

UPDATE ALL RECIPES

Legislations

Organisations

Users

Invoices

Contact Entries



Visible to you and 1 other

Draft



Use as an ingredient

Recipe Information ☒ Yield ☒ **Ingredients ☒** Processing Profiles ☒ Revision History

## ADD INGREDIENTS

Add the individual materials or ingredients, their allergens and their percentage of this recipe.  
Ingredients can be selected from your organisation's Ingredient Library or they can be entered as part of the recipe.

Q Add an Ingredient



## CURRENT INGREDIENTS

ALLOCATED  
100%

✓ Cooking fat



30%

✓ Sugar



30%

✓ Liquid whole egg



20%

✓ Batter



10%

## INGREDIENTS

Review the allergen information (e.g. product specification) from the supplier for each ingredient, raw material and processing aid to determine the presence or absence of all relevant allergens as intentionally added allergens or cross contact allergens.

Intentionally Added Allergens are any ingredient (or intrinsic part of the ingredient) of the recipe/formulation which contains an allergen, and includes all allergens which require mandatory declaration in the country of sale.

Cross Contact Allergens are a residue or other trace amount of a food allergen that is unintentionally incorporated into another food. Cross contact allergens can be present in a "readily dispersible" or "particulate" form.

Readily Dispersible Cross Contact Allergens are a powder or liquid in homogenous form that is easily distributed throughout a food product eg. milk powder, soy flour. A readily dispersible cross contact allergen is considered homogeneously distributed in the final product.

Particulate Cross Contact allergens, for the purpose of the VITAL risk assessment, are a particulate which is a separate and distinct particle of material (eg. sesame seeds, slivered nuts, grated cheese) which either

- Doesn't mix homogeneously with other parts of the food; or,
- may consist of, or are likely to aggregate into, an entity which contains a level equal to or greater than the relevant Reference Dose.

# VITAL Online – Australia/New Zealand

## Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat

## PEAL

Cereals

- Barley
- Oats
- Rye
- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten

# VITAL Online – Australia/New Zealand

## Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat

## PEAL

Cereals

- Barley
- Oats
- Rye

**Gluten proteins may be removed due to processing or breeding techniques.**

- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten

# VITAL Online – Australia/New Zealand

## Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat

## PEAL

Cereals

- Barley
- Oats
- Rye

**Deleted – now 'wheat & its hybrids'**

- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten



# VITAL Online – Australia/New Zealand

## Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat

## PEAL

Cereals

- Barley
- Oats
- Rye
- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten

**\*NEW\***

# THANK YOU

We are delighted to welcome our first Global Member.



- ALCR Shores
- BDF Hull Limited
- Cargill Protein Europe
- Lindt & Sprüngli Australia
- SoFina Foods