

Allergen Bureau

VITAL[®] - Gluten & Allergen Free Claims assessment

Kirsten Grinter
President Allergen Bureau

July 2021



Informing the
food industry

Agenda

- About Us
- Vision and Mission
- Strategies 2021-2025
- Gluten & Allergen Free Claims
- Allergen Bureau Resources & some next steps

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Food allergen management guidance *for industry, by industry*

The Allergen Bureau is the peak industry body representing best practice food industry allergen management globally.

Become a member today.

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Informing
the Food
Industry

Across all stages
of food production

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Our Membership

- Membership based organisation established to provide food industry with rapid responses to questions about allergen risk management in food ingredients & manufactured foods
- Pre-competitive, 'not-for-profit', Allergen Bureau directors provide voluntary, unpaid services.
- Great example of cooperation amongst competitors in the food industry

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ALDI Stores
BBF Hull Limited
[SoFine Foods](#)

Global Members



Full Members



Vision & Mission

Vision: A trusted food supply for allergen sensitive consumers around the world.

Mission: Lead the global food industry in best practice allergen management, sharing information that builds trust and transparency that supports allergen sensitive consumers to make informed choices.

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Our Strategies 2021-25

1. Evidence based science
2. Best practice allergen management guidance & resources
3. Key stakeholder acknowledgment
4. Global influence & brand recognition
5. Good governance and financial sustainability



Voluntary Incidental Trace Allergen Labelling (VITAL[®])

Allergen Risk Review & Claims Substantiation

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VITAL Scientific Expert Panel (VSEP)

- VITAL recognised as best practice risk assessment
- Reference Doses based on - 1 in 100 allergic consumers reacting (mild and transient reaction, requiring no emergency medical intervention)
- The majority of allergic consumers can eat a normal diet
- VSEP provide the scientific expertise underpinning VITAL



The VSEP Today

- Dr Steve Taylor (Chair of Panel) – Food Allergy Research & Resource Program (FARRP) (USA)
- Dr Joseph Baumert – Food Allergy Research & Resource Program (FARRP)
- Dr Geert Houben – Program Manager Food Safety, Netherlands Organisation for Applied Scientific Research (TNO) (NL)
- Dr Rene Crevel (RENE CREVEL Consulting Ltd) (UK) (formerly of Allergy & Immunology, Unilever)
- Dr Benjamin Remington – Food Allergy Research & Resource Program (FARRP) and Remington Consulting Group B.V. (NL)
- Dr Simon Brooke Taylor (Food Safety & Risk Analysis Consultant, Allergen Bureau) (AUS)

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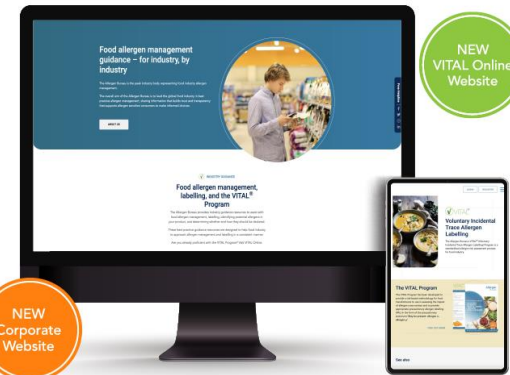
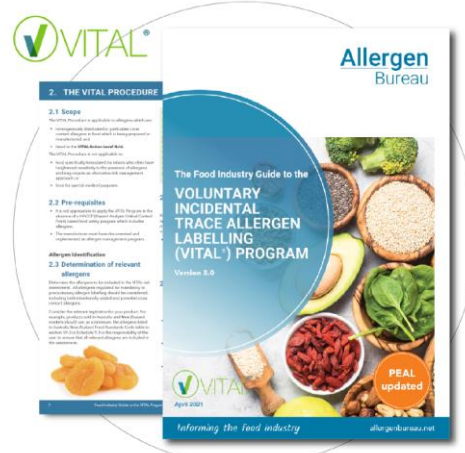


Your VITAL® Resources

- Allergen Risk Review Website
- The Food Industry Guide to the VITAL Program
- Food Industry Guide Allergen Management & Labelling (FIGAML)
- VITAL Best Practice Practice Labelling Guide
- The VITAL Standard
- VITAL Online

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Resources
for the
Food Industry



Allergen Risk Review

- Claims substantiation of any type needs robust risk review and focus
- The Allergen Risk Review website (ARRW) is a freely available interactive factory map designed to assist the food industry with understanding the allergen status of its products
- Here you can find detailed information about assessing allergen risk at every stage of the process to make food

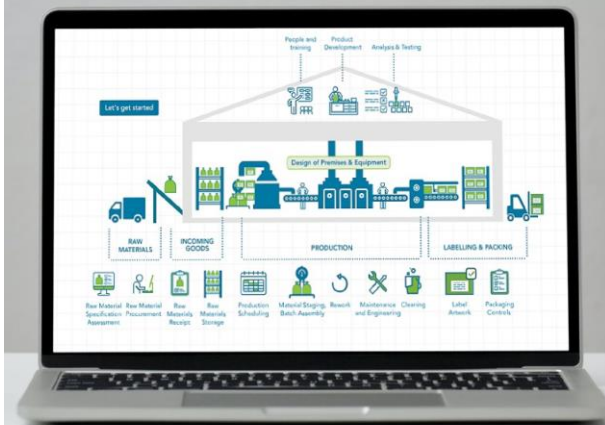
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info.allergenbureau.net/

Allergen Risk
Review Website

Assessing allergen risk
at every stage of the
process to make food.

Find out more



Gluten Free Claims

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A person's hands are shown sifting a fine, light-colored powder, likely flour, into a rustic wooden bowl. The person is wearing a dark blue t-shirt and denim jeans. The background is a plain, light blue wall. The scene is lit with soft, natural light, creating a warm and clean atmosphere.

Let's talk
Gluten Free Claims

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Gluten Free Australia & New Zealand

- 'Gluten free' is a nutrition content claim with criteria in regulation
- No specific LOQ to substantiate 'nil detected' though generally LOQ of 5ppm is applied
- Allergen Bureau view is:
 - Use a validated/approved kit
 - Performed by an accredited laboratory and routinely as part of a proficiency program

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Gluten Free International Perspective

- VITAL Online is locked at 20ppm for wheat and other cereals
- VITAL could be used to validate the Gluten Free status of your products however:
 - You must know your supply chain & have good documented allergen management practices in place

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**ACTION LEVEL
FOR CEREALS
CONTAINING
GLUTEN**

 The Action Level for cereals containing gluten will depend on the Reference Amount but is locked in the VITAL[®] Action Level Grid to a maximum of 20ppm.
Why?



Gluten Free Claims

- VITAL can be used to validate GF claims theoretically if the GF criteria is 20ppm
- AUS/NZ – the criteria is nil detected – testing is appropriate to substantiate GF
- Gluten Free claims should be supported by evidence
- The management processes applied are key - including storage, handling, manufacture & packing



Gluten Free Certification

- GF Certification is not mandatory but may be helpful
- Businesses must ensure products labelled “gluten free” meet regulation
- Coeliac organisations may endorse food producers and retailers to use the ‘Crossed Grain Trademark’
- The underpinning criteria varies depending on the certification program



Allergen Free Claims

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A woman with blonde hair tied back and a young child with blonde hair are looking down at a plate of food on a wooden table. The woman is on the left, and the child is on the right. The background is a bright, modern kitchen with a window and a sink.

Let's talk
Allergen Free Claims

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Allergen Free Claims

- Criteria for allergen free claims such as 'dairy free' or 'peanut free' are not in regulation
- Free claims - Captured by Consumer Competition regulations
- In AUS/NZ 'allergen free' claims infer zero
- Allergen free claims can be made but – require evidence/due diligence & higher level of validation to substantiate

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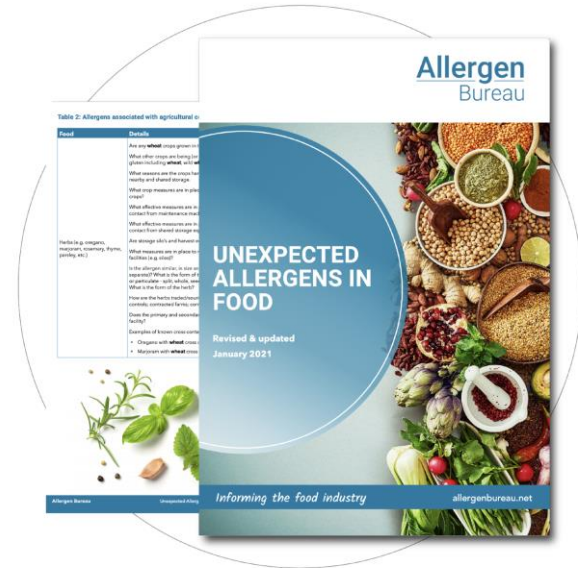
Allergen Free Claims

- There is no intrinsic reason why a production line that makes products containing an allergen cannot also make a product free of the allergen
- Specific validated cleaning steps at changeover should be part of the allergen management plan
- Applying VITAL - a labelling outcome at Action Level 1 would be considered contradictory and incompatible with a free claim



Free Claims & Ag Co-Mingling

- Allergens present due to agricultural co-mingling do not fall under the requirements for mandatory labeling
- Co-mingling is a normal agricultural practice
- There is limited information about the level of risk caused through co-mingling
- Allergen Free representations are at significant risk of being incorrect if not managed well
- The important point - Know your Supply Chain



Summary

GF & Allergen Free Claims

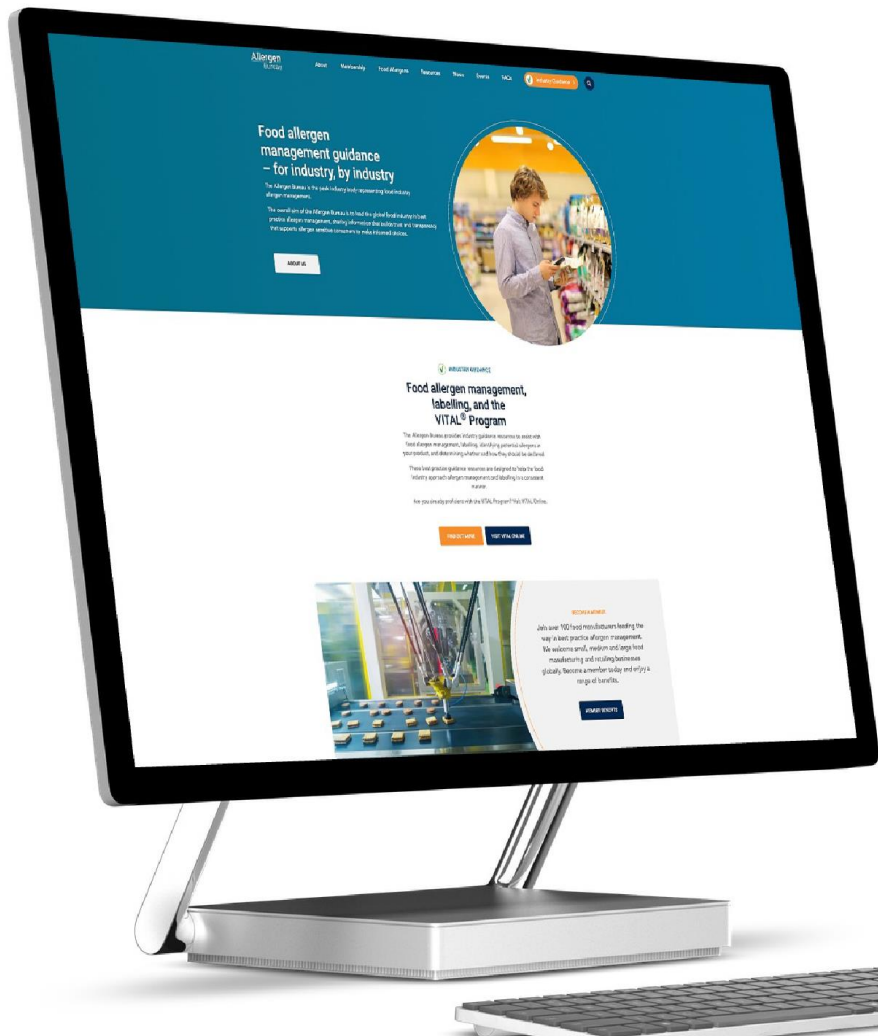
- VITAL & Gluten Free claims – Can be used to validate (20ppm) criteria
 - Robust management practices must be implemented & ongoing confirmation that regulatory criteria is met
- VITAL & Allergen Free claims – We consider that Action Level 1 does not mean free
 - What is the consumer expectation of free?



Allergen Bureau Resources

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Have you visited our
New Website?

For the
Food Industry

allergenbureau.net



Easy
Step-by-step
industry
guidance

1

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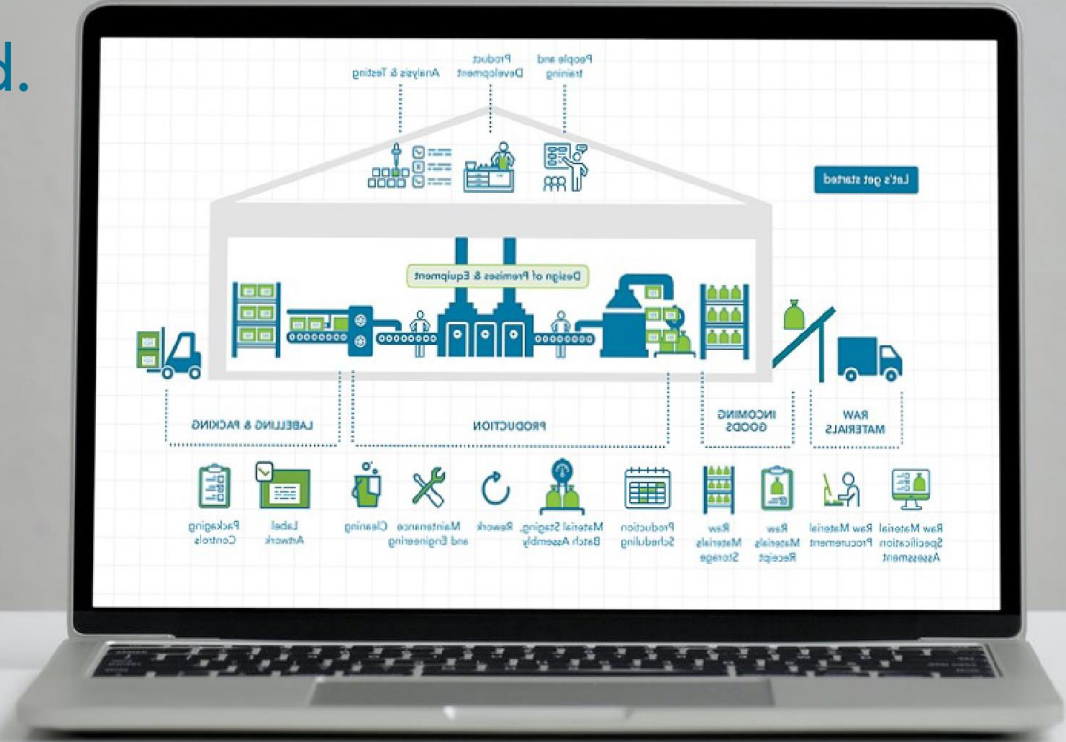
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3 Step Industry Guidance Page

1. Food Industry Guide to Allergen Management and Labelling for Australia and New Zealand – PEAL updated edition;
2. Allergen Bureau's Allergen Risk Review website;
3. Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL[®]) Program.

Assessing allergen risk at every stage of the process to make food.

Find out more



Have you used VITAL?

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



vital.allergenbureau.net

VITAL Online – it can help



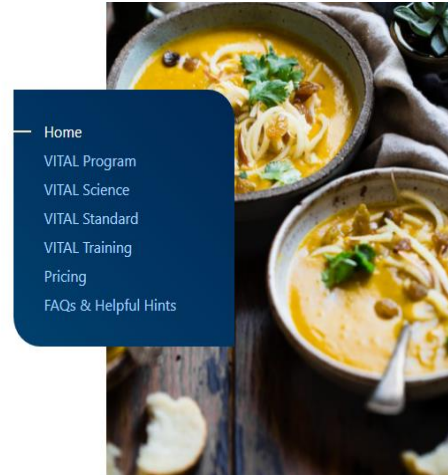
- VITAL Online rebuild improves performance, performance, manageability, and reliability
- You can now access the brand new VITAL Online website for the VITAL Online Calculator, as well as VITAL Science, VITAL Training, the VITAL Standard, and more, via the new VITAL Online portal.



vital.allergenbureau.net

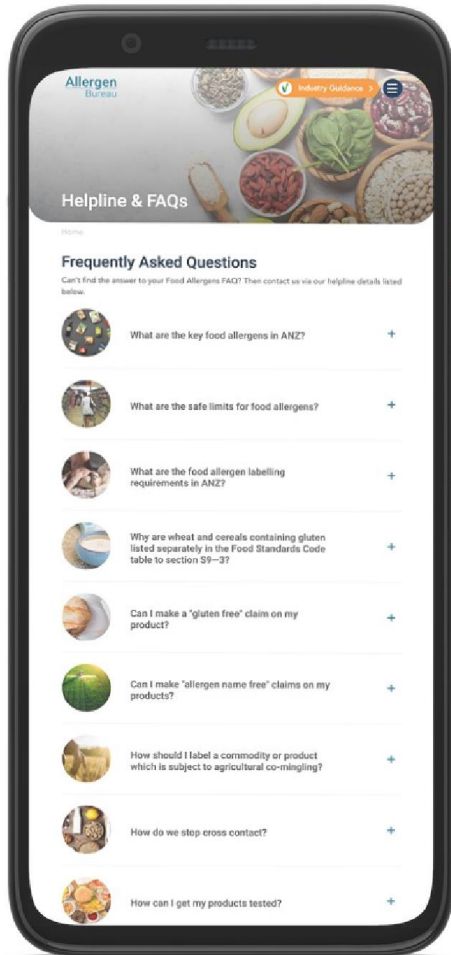
VITAL – One Step Further

- Food Category Consumption data rather than nominated reference amounts?
- Another level of consistency and robustness
- Working group activity



Voluntary Incidental Trace Allergen Labelling

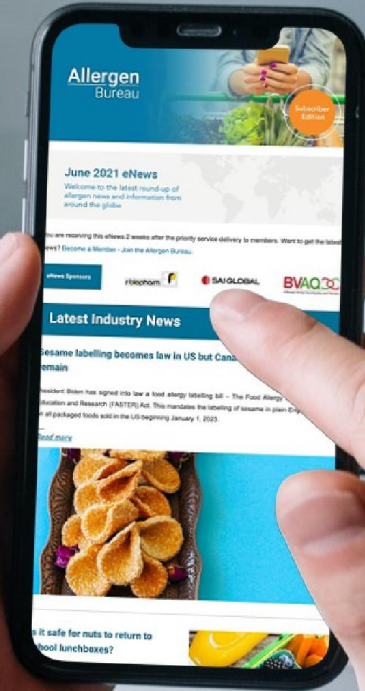
The Allergen Bureau's VITAL[®] (Voluntary Incidental Trace Allergen Labelling) Program is a standardised allergen risk assessment process for food industry.



Have a question?
**FAQ &
Free Helpline**

Industry News

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info@allergenbureau.net

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