

Allergen Bureau

Informing the
food industry

PEAL & PAL FAQs to the Allergen Bureau's Helpline

PRESENTED BY:
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Agenda

- Consistency in allergen labelling
- Allergen Bureau resources
- “may contain” or Precautionary Allergen Labelling (PAL) statements
- Tree nuts and PAL
- Cereals and PAL
- Milk in dark chocolate risk review anomaly
- Sulphites

Allergen Bureau

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

Become a member

Global Member



Full Members



- ALDI Stores
- BBF Hull Limited
- SoFine Foods

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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Consistency is our most powerful tool in allergen labelling

- The Allergen Bureau promotes consistent allergen labelling
- PEAL has clearly defined how allergens should be declared in a statement of ingredients and summary statement
- There are still some areas for consistency (e.g. tricky labelling decisions) and precautionary allergen labelling
- Regulations vs voluntary



PEAL
Updates

Resources for Industry

Access them all via the Allergen Bureau website



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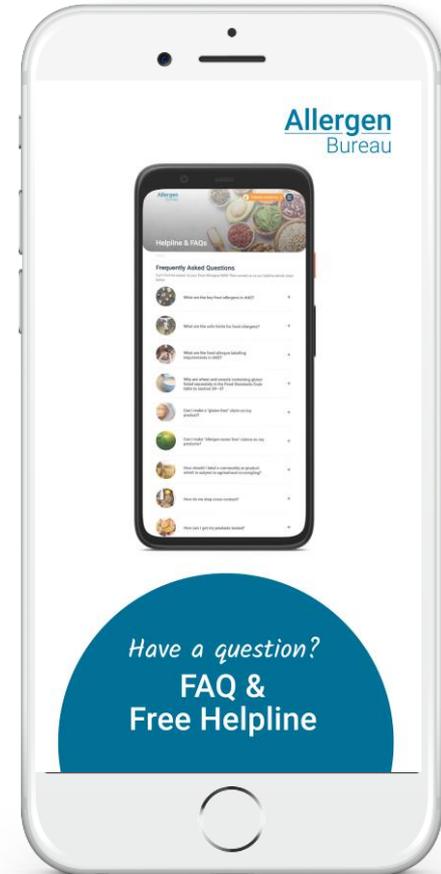
Free Helpline

- Allergen labelling
- Allergen management
- The VITAL Program
- VITAL Online
- “Curly” questions!

Email: info@allergenbureau.net

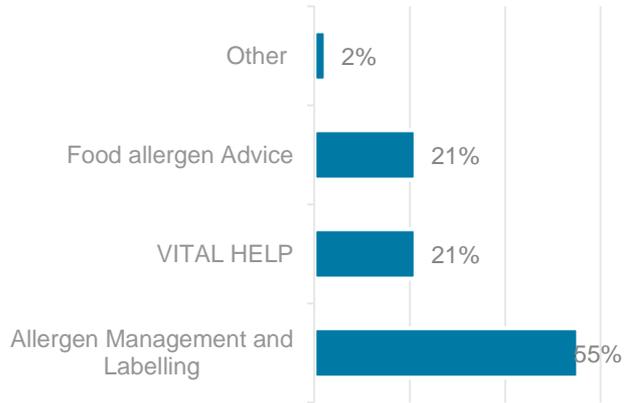
Phone: +61 437 918 959 (International)

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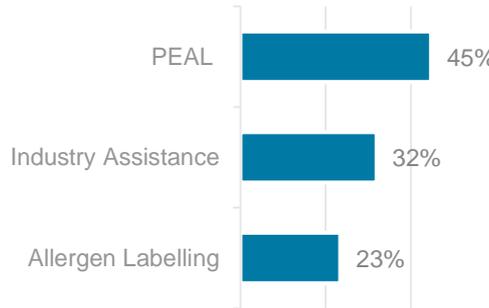


Helpline Summary of Assistance

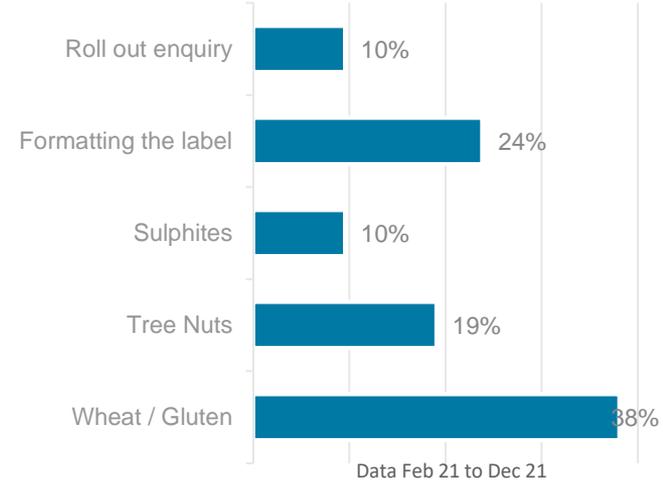
Allergen Bureau Helpline Service



Allergen Management & Labelling Enquiries



PEAL Enquiries (including PEAL and PAL)



Precautionary Allergen Labelling (PAL) Statements

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



Trial VITAL
Online
today



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

Which PAL Statement (as per FIGAML)?

May be present:

VITAL Program

May contain:

Other risk assessment (also
permissible under the VITAL
Standard)

Recommended Labelling Format – PAL Statement

Ingredients

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

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 of PAL statement

- Separately from, but next to, the summary statement
- Below the Summary Statement
- Where there is no Summary Statement, then place below the Statement of Ingredients



Recommended Labelling Format – PAL Statement

Ingredients

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 (ANZFSC) + 'gluten' where present

Declare individual allergens wherever possible

Use singular terms



Tree Nuts & PAL

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I know that I need to declare specific tree nuts, but do I need to declare specific tree nuts in a PAL Statement? Is “May be present: tree nuts.” OK?



Tree Nut Allergy

- Some people are allergic to one or more tree nuts but it is unusual to be allergic to all tree nuts
- Hence it is important for consumers to understand **which tree nuts** are present



Declaring Tree Nuts

- Tree nuts required names: cashew, pistachio, pecan, walnut, almond, Brazil nut, hazelnut, macadamia, pine nut. (the table to S9-3, ANZFSC)
- Mandatory requirement to declare intentionally added tree nut by their required name in the
 - statement of ingredients; and
 - summary statement.



Cross Contact from Tree Nuts

- Cross contact from tree nuts may be due to ingredients or processing.
- A **thorough risk assessment** must be completed, and all cross contact should be eliminated.
- Where this is not possible, they should be reduced to the minimum amount and controlled and managed at that level.
- Declare in a precautionary allergen labelling (PAL) statement using required names

For example:

May be present: almond, pine nut.



Tree Nuts

- What are the scenarios where stating 'Tree nuts' is appropriate?
 - thorough documented risk assessment; and
 - all or most tree nuts are present or could be present.



Cereals & PAL

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Cereals Containing Gluten

- The Approval Report for P1044 (PEAL) states that:
“gluten is the substance of concern for individuals with Coeliac disease and Dermatitis Herpetiformis”
- And
“allergies to barley and rye are uncommon in Australia and New Zealand, and oat allergy is rare.”.. “Therefore, wheat is the only cereal of public health significance for allergy”
- **Wheat** (wheat and its hybrids) and **Gluten** (wheat, rye, barley, oats and their hybrids) are the substances of concern in the Code



Cereals in ANZFSC – pre/post PEAL

Pre-PEAL (Std 1.2.3)	PEAL (Schedule 9)
<p>Cereals containing gluten</p> <ul style="list-style-type: none">• Barley• Oats• Rye• Spelt• Wheat	<p>Any of the following cereals (including their hybridised strains) if they contain gluten:</p> <ul style="list-style-type: none">• Barley• Oats• Rye <p>Wheat (including its hybridised strains) irrespective of whether it contains gluten.</p>

Food	Required Name (Statement of Ingredients) Source: S9-3, Col 2, ANZFSC	Other declaration (Summary Statement) Source: S9-3, Col 3, ANZFSC	Precautionary Allergen Labelling (PAL) Statement where present as a cross contact allergen Source: FIGAML
Barley (which contains gluten)	Barley	Gluten	Barley, gluten
	Ingredients: ... barley flour... Contains: Gluten.		May be present: barley, gluten.
Barley (derived from barley but no rigorous risk assessment to determine if gluten is present)	Barley	Gluten	Barley, gluten
	Ingredients: barley grass.... Contains: Gluten.		May be present: barley, gluten.
Barley (derived from barley but determined, by rigorous risk assessment to not contain gluten) **special case**	n/a	n/a	n/a
	Ingredients: barley grass....		

Food	Required Name (Statement of Ingredients)	Other declaration (Summary Statement)	Precautionary Allergen Labelling (PAL) Statement
Wheat (which contains gluten)	Wheat	Wheat, gluten.	Wheat, gluten.
	Ingredients: ... wheat flour... Contains: wheat, gluten.		May be present: wheat, gluten.
Wheat (derived from wheat but does not contain gluten)	Wheat	Wheat	Wheat
	Ingredients: ... wheat starch... Contains: Wheat.		May be present: wheat.
Wheat (exemption is in Col 2 of the table to S9-3)	n/a	n/a	
	Ingredients: Glucose...		

Examples Provided...

2021
Food Industry Guide to Allergen Management and Labelling
For Australia and New Zealand

PEAL updated

A partnership document of the Australian Food and Grocery Council and the Allergen Bureau

Wheat
This product contains wheat. Wheat is a grain and is one of the top 10 allergens in Australia and New Zealand. Wheat is used in a wide range of products, including bread, pasta, and cereals. Wheat is also used in many processed foods, including soups, sauces, and dressings. Wheat is also used in many traditional medicines. Wheat is also used in many traditional medicines. Wheat is also used in many traditional medicines.

Spelt
This product contains spelt. Spelt is a grain and is one of the top 10 allergens in Australia and New Zealand. Spelt is used in a wide range of products, including bread, pasta, and cereals. Spelt is also used in many processed foods, including soups, sauces, and dressings. Spelt is also used in many traditional medicines. Spelt is also used in many traditional medicines.

Triticale
This product contains triticale. Triticale is a grain and is one of the top 10 allergens in Australia and New Zealand. Triticale is used in a wide range of products, including bread, pasta, and cereals. Triticale is also used in many processed foods, including soups, sauces, and dressings. Triticale is also used in many traditional medicines. Triticale is also used in many traditional medicines.

See FIGAML for more examples of how to declare allergens in the statement of ingredients and summary statement.

Ingredients
wheat gluten
Contains: wheat, gluten.

Ingredients
spelt (wheat)
Contains: wheat, gluten.

Ingredients
triticale (wheat, rye)
Contains: wheat, gluten.

Determining if a Cereal Contains Gluten

- Determining if gluten is present in a cereal is important to know how to label it
- Industry best practice
 - supplier information
 - validation which may include specialized laboratory analysis, in addition to methods for quantitative allergen analysis
 - if you are unsure if gluten is present, assume that it is!
- Different to gluten-free claims (which are outlined in the Code Std 1.2.7 & Schedule 4)



Milk in Dark Chocolate & The Summary Statement

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Milk in Dark Chocolate: Allergen Risk Review Anomaly

- Milk chocolate and dark chocolate made on the same line
- Milk is present in the dark chocolate in significant amounts
- Inconsistent labelling practices in the food industry
- Outside mandatory labelling requirements & above expectations of 'trace' amounts
- Declare 'milk' as the last ingredient in the statement of ingredients & also the summary statement (in line with Key Guiding Principles)
- Specific to milk in dark chocolate ONLY!

Ingredients:, **milk.**
Contains: **milk.**



GUIDANCE TO AUSTRALIA/NEW ZEALAND FOOD INDUSTRY ALLERGEN RISK REVIEW ANOMALY FOR DARK CHOCOLATE

This industry guidance is not intended to be binding nor to represent legal advice from any of the parties that have engaged or collaborated in its development.

This guidance to the food industry, together with education and associated activities, is designed to improve the nature and consistency of allergen information provided to consumers where a dark chocolate allergen risk review anomaly occurs.

An allergen risk review anomaly (IRRA), in relation to dark chocolate, and inconsistent labelling practices were identified by the confectionery industry. This occurs where dark chocolate is manufactured following production of milk chocolate, ie milk remains in the dark chocolate at variable levels, often above the Allergen Bureau Voluntary Incidental Trace Allergen Labelling (VITALSM) Program Action Level where precautionary allergen labelling (PAL) would be recommended. This is also above the allergic consumer and their carer's expectation of 'trace' or 'minimal' (cow's) milk levels.

BACKGROUND

The Australian Industry Group (Ai Group) Technical Committee established a working group (the working group) with the Allergen Bureau (AB) and, in consultation with the Australian Food & Grocery Council (AFGC), worked together to consider industry guidance in relation to this allergen risk review anomaly and food labelling.

A jurisdiction consensus was sought to determine the best way to manage the issue.

The Ai Group working group led discussions with the NSW Food Authority (NSWFA), Food Standards Australia New Zealand (FSANZ) and Implementation Sub-Committee for Food Regulation (ISFR) on how best to manage the risk. ISFR members include Australian Government, New Zealand Government and Australian state and territory authorities responsible for food regulation. Each jurisdiction enforces their respective Food Acts that give legal effect to the Australia New Zealand Food Standards Code (the Code).

The Code requires the mandatory declaration of certain substances or foods when present as an ingredient, sub-ingredient, additive or processing aid (Food Standards Code – Standard 2.2.2 – Information requirements – warning statements, advisory statements and declarations, Clause 4). However, the Code does not define an 'ingredient' (the definition of an ingredient was removed with the last Code Revision) and is silent on the labelling of allergens present in other circumstances, for example where due to cross contact (cross contamination).

THE ISSUE

The issue of milk in dark chocolate has been identified as an allergen risk review anomaly, in commercial operations, where the allergen is not an intended ingredient nor is it included as part of the recipe as an ingredient, sub-ingredient, additive or processing aid in the product. It falls outside the mandatory

Sulphites

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Why aren't sulphites included
in VITAL Online?



Sulphites

- Listed in the table to section S9-3 as “added sulphites present at 10mg/kg or more”
- Only **added** sulphites are considered to be allergens and not naturally occurring sulphites
- Sulphites can be created and destroyed during production
- Calculation method used for other allergens may not be applicable for sulphites – hence sulphites are not listed in VITAL Online
- Usually assessed via finished product analysis



Sulphites (Intentionally Added)

1. Is it an additive?

Check labelling requirements for additives

2. Is it an allergen?

Are there 10 mg/kg or more of added sulphites present in the product

Declare '**sulphites**' in a bold font



THANK YOU

CONTACT US:



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www.allergenbureau.net