

# Allergen Bureau

## Allergen Recalls, & Tools to minimise the risk

Food and Beverage  
Importers Association –  
31 March 2022

Debbie Hawkes

Informing the  
food industry



# Agenda

- Who is the Allergen Bureau?
- Recalls
- Regulations (ANZ & International)
- PEAL
- Validating Label Information
- Key Tools

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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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# Allergen Bureau

- Membership based organisation established to provide food industry with rapid responses to questions about allergen risk management in food ingredients and manufactured foods
- Established in 2005, pre-competitive, 'not-for-profit', Allergen Bureau directors provide voluntary, unpaid services

[Become a member](#)

## Global Member



## Full Members



gen  
au

- ALDI Stores
- BBF Hull Limited



# 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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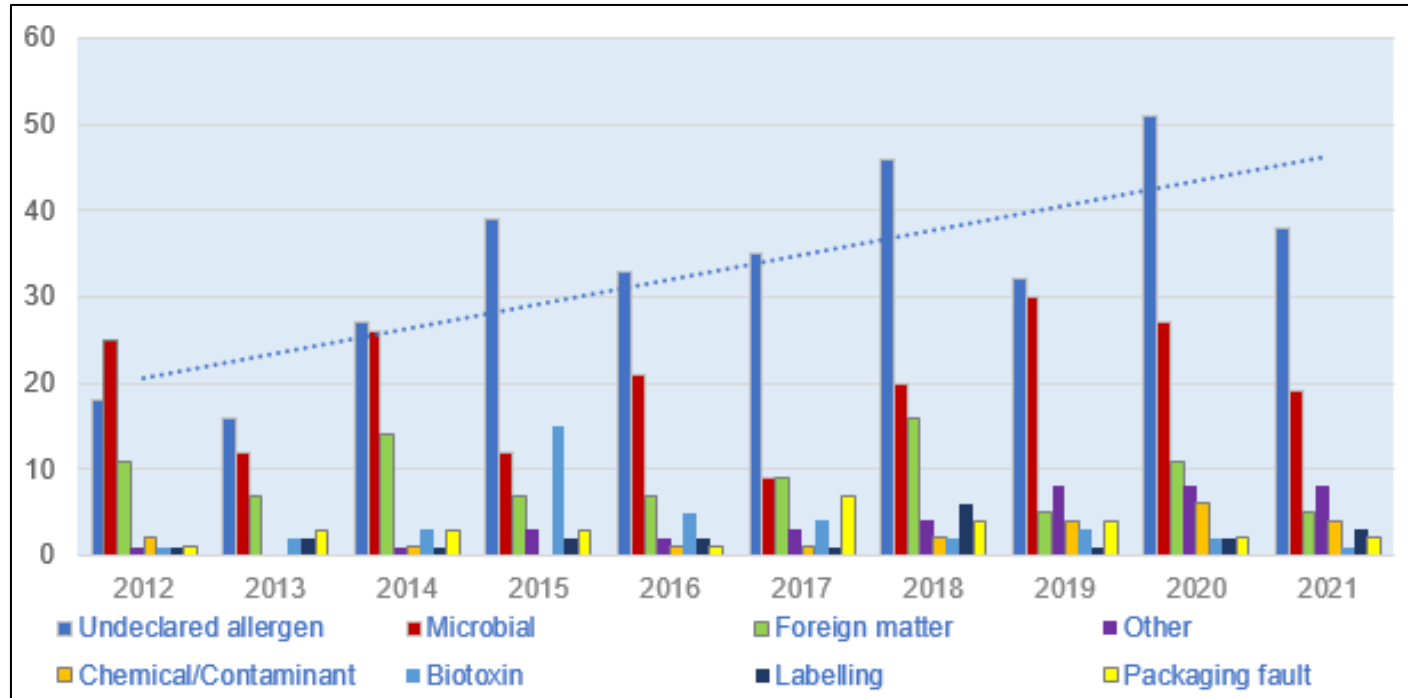


# Recalls

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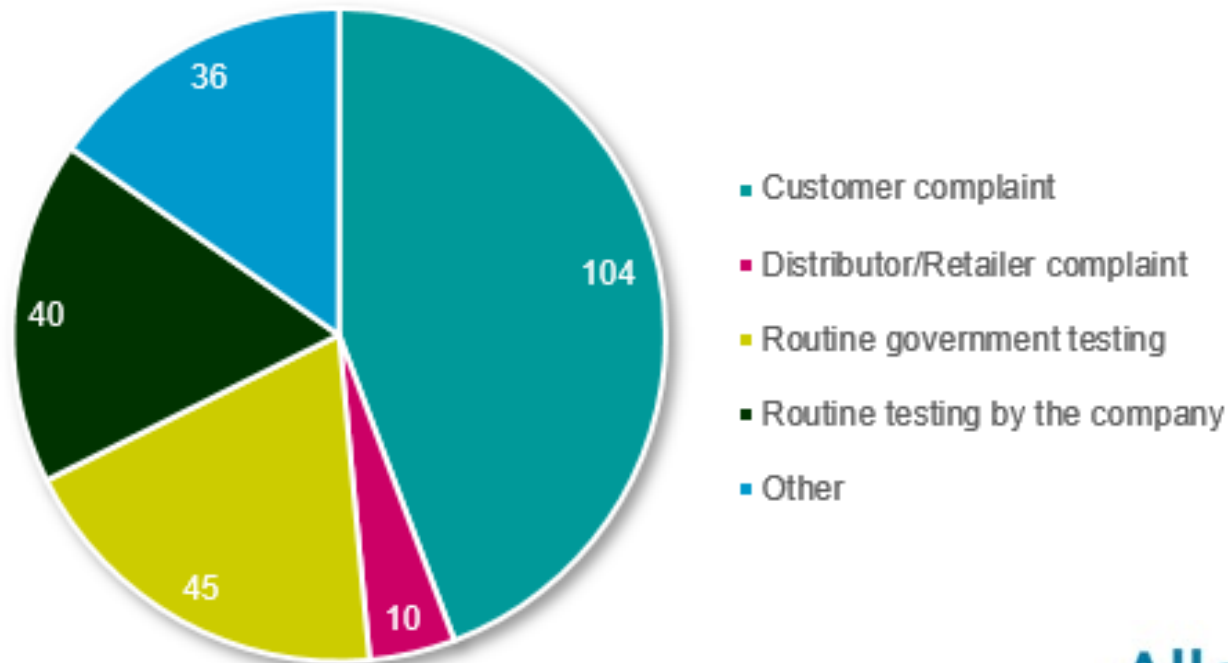


# FSANZ food recalls by classification 2012-2020



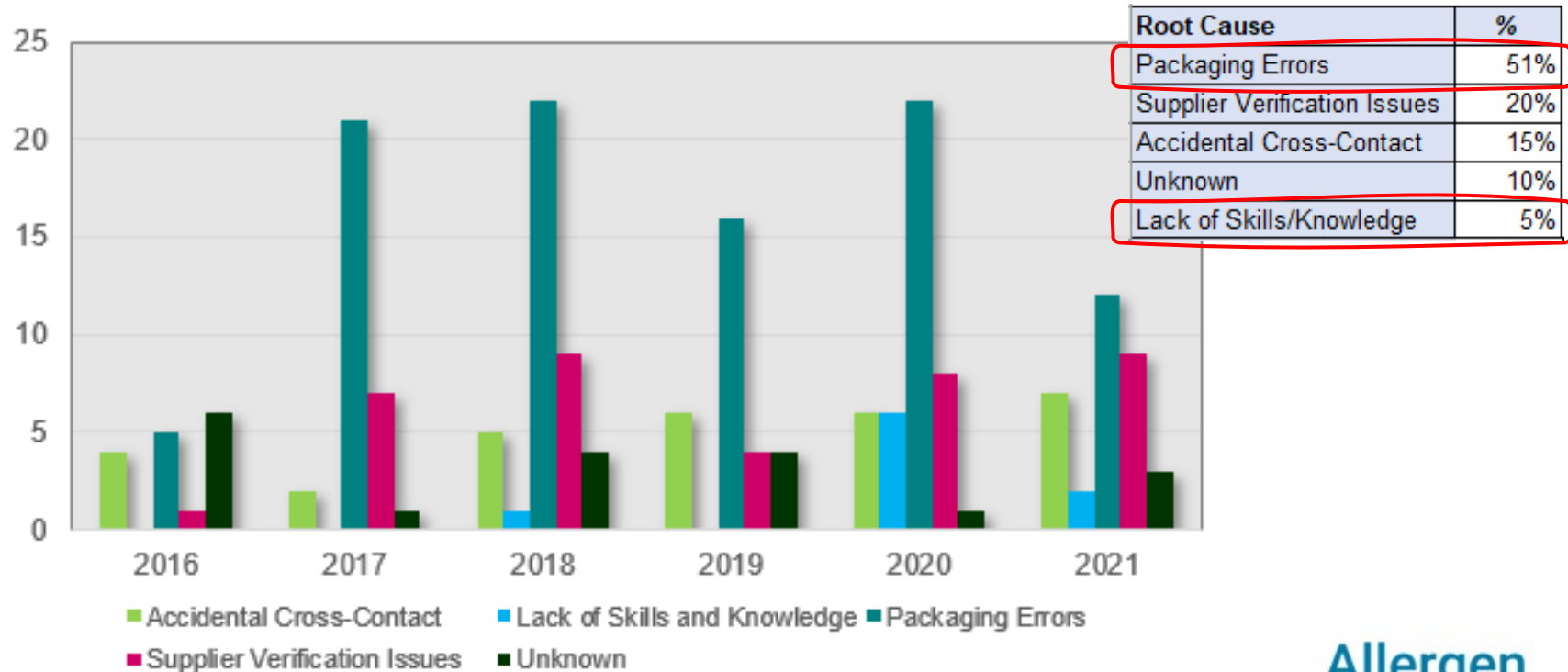
*Thank you to FSANZ for providing this data including 2021*

# Problem detection for undeclared allergen recalls 2016–2021

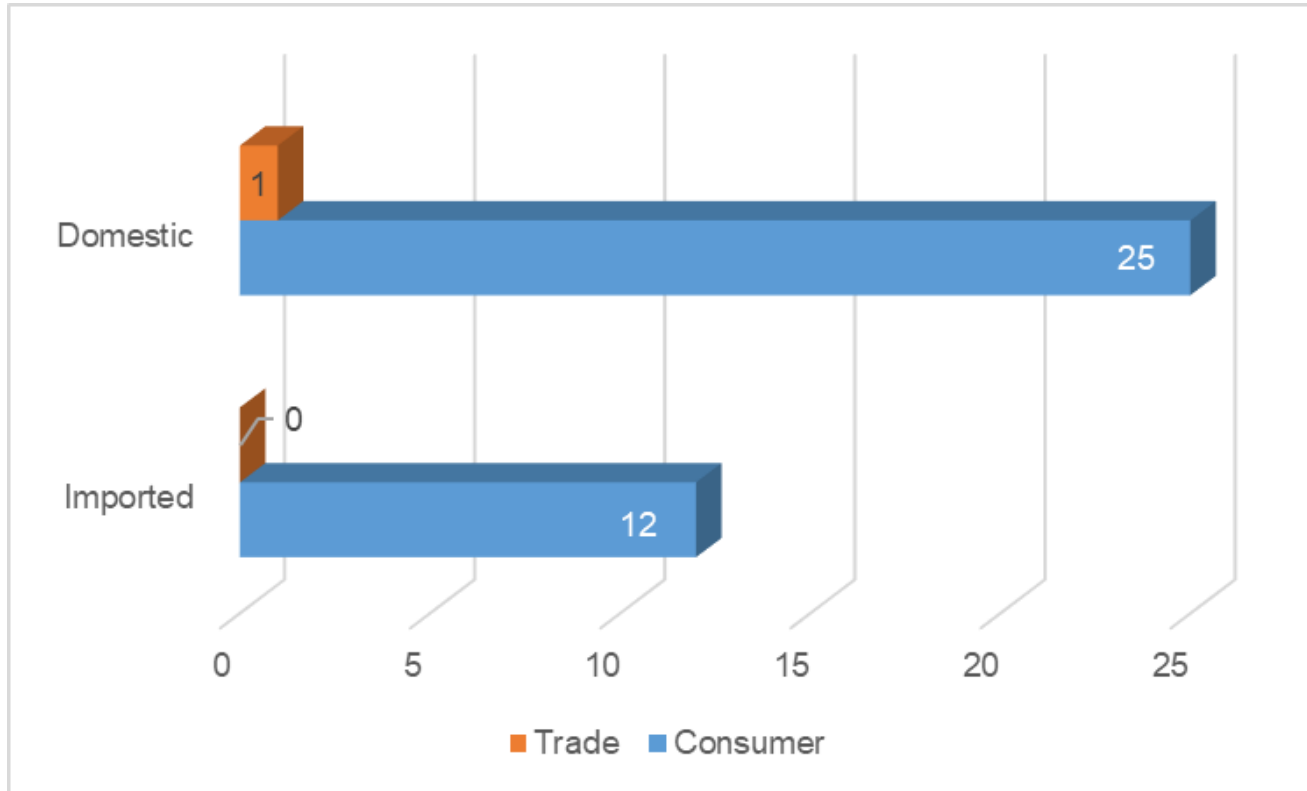




# Root cause for undeclared allergen food recalls



# Source of undeclared allergen food recalls (2021)



# Regulations (ANZ & International)

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Foods of public  
health significance in  
ANZ with the  
potential to cause...

# allergic reactions

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**Wheat** (of the genus *Triticum*, including spelt, and its hybridised strain such as triticale)



**Any of these tree nuts**  
almond, Brazil nut, cashew,  
hazelnut, macadamia, pecan,  
pine nut, pistachio, walnut



**Crustacea**



**Egg**



**Fish**



**Lupin**



**Milk**



**Mollusc**



**Peanut**



**Sesame seed**



**Soybean**

Foods of public health significance in ANZ with the potential to cause non-allergic, hypersensitivity reactions. Also known as...

# food intolerance

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**Added sulphites**  
in concentrations of  
10mg/kg or more



**Any of these  
cereals  
containing gluten**  
wheat, barley, oats,  
rye and their hybrids



# ANZ allergen labelling requirements

Most allergen declaration requirements are set out in FSANZ, [Std 1.2.3](#) with additional information in [Schedule 9](#) which lists the allergens to be declared.

The allergen declaration requirements are very comprehensive and apply to packaged foods, non packaged foods, foods offered for retail sale, foods for catering purposes and all other foods.

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The FSANZ website provides more information.  
Go to [www.foodstandards.gov.au](http://www.foodstandards.gov.au)





# International food allergen regulation

Imported foods offered for sale in ANZ must comply with the Code and Food Acts.

It cannot be assumed that allergen information provided with imported foods and ingredients will automatically comply with ANZ requirements because allergen labelling requirements differ across countries and regions.

All imported foods and ingredients should be checked carefully for compliance before being offered for sale.



# Different Mandatory Allergens per Country



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CODEX  
(8 allergens)



European Union  
(13 allergens)



Aust/ NZ  
(10 allergens)



Canada  
(11 allergens)



China  
(8 allergens)



Hong Kong  
(8 allergens)



Japan  
(6+ allergens)



Korea  
(7+ allergens)



Mexico  
(8 allergens)



USA  
(8 allergens)

# Only 5 Food Allergens common to these jurisdictions

Food Allergens	USA	Canada	EU	Australia/NZ	China	Japan	South Africa
✓ Crustacean Shellfish	x	x	x	x	x	Crab/Shrimp	x
✓ Egg	x	x	x	x	x	x	x
Fish	x	x	x	x	x		x
✓ Milk	All mammal	x	Farmed mammal	Milking animals	x	x	Cow & Goat
✓ Peanut	x	x	x	x	x	x	x
Soy	x	x	x	x	x		x
✓ Tree nuts	x	x	x	x	x	Walnut	x
Wheat	x	x	x	x	x	x	x
Cereals / Gluten		x	x	x	x		
Buckwheat						x	
Celery			x				
Lupin			x	x			
Molluscan Shellfish		x	x	x			x
Mustard		x	x				
Sesame	x	x	x	x			
Sulphites $\geq 10$ mg/kg	x	Directly added or $\geq 10$ mg/kg	x	x			

Refer: <https://farrp.unl.edu/IRChart> for more details

# “Gluten Free”Australia & New Zealand

- ‘**Gluten free**’ is a nutrition content claim ([Schedule 4](#))

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.
- No specific LOQ to substantiate ‘nil detected’ though generally LOQ of 5ppm is applied
  - Allergen Bureau view:
    - ✓ Use a validated/approved kit
    - ✓ Performed by an accredited laboratory and routinely as part of a proficiency program







# “Gluten Free” - Codex

Many Countries outside of ANZ follow the food safety standard **Codex Alimentarius** established by the Food and Agriculture Organization (FAO) and the World Health Organization (WHO).

Codex defines a product may be labelled as “gluten free” if it contains **no more than 20 mg/kg** gluten.

# PEAL

Plain English Allergen  
Labelling

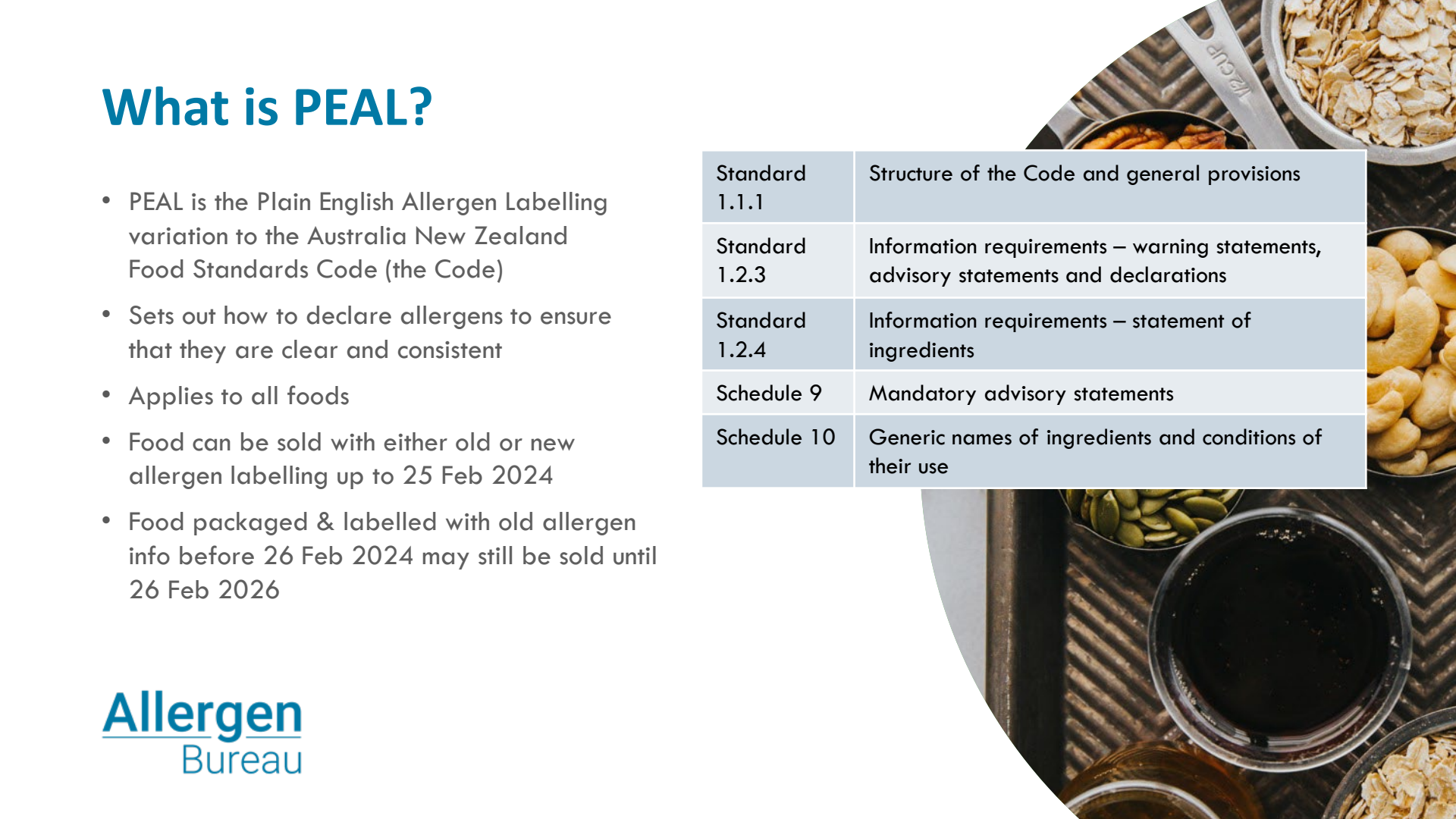
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# What is PEAL?

- PEAL is the Plain English Allergen Labelling variation to the Australia New Zealand Food Standards Code (the Code)
- Sets out how to declare allergens to ensure that they are clear and consistent
- Applies to all foods
- Food can be sold with either old or new allergen labelling up to 25 Feb 2024
- Food packaged & labelled with old allergen info before 26 Feb 2024 may still be sold until 26 Feb 2026



Standard 1.1.1	Structure of the Code and general provisions
Standard 1.2.3	Information requirements – warning statements, advisory statements and declarations
Standard 1.2.4	Information requirements – statement of ingredients
Schedule 9	Mandatory advisory statements
Schedule 10	Generic names of ingredients and conditions of their use

# PEAL in one page...

- **Required names:**  
Mandatory specified names for allergens
- **Molluscs** & individual (specified) **tree nuts** to be declared
- Focus on **wheat** and **gluten** as substances of concern
- **'Contains' summary statement** is required
- Format and location requirements for the allergen declaration

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PEAL  
Updates

# Review Labels for Compliance

- PEAL means that a significant number allergen declarations will require review
- Check that your specifications &/or Product Information Forms (PIF) are up to date?
- Review manufacturers allergen management plans
- ***Refer to industry guidance (FIGAML) to contribute to consistency in labelling across the food industry***



# Validating Label Information

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# Reduce the risk of labelling errors

Are you & your suppliers aware of the **Allergen Risk Review** website?



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*Factory Map - ARRW*



# Reduce the risk of labelling errors



Raw Materials Step 1 of 15

## Specification assessment

**Raw material specifications** should be checked thoroughly to obtain a clear understanding of the allergen status of ingredients, raw materials and processing aids. Investigating the allergens status of raw materials is essential to preventing allergens being unknowingly added to a product.

Understand the regulatory requirements ✓

Obtain specifications for every material ✓

Seek confidence in supplier information ✓

Having trouble getting information? ✓

Identify intentionally added allergens ✓

Identify cross contact allergens ✓

Quantify cross contact allergens ✓

Particulates and Readily Dispersible material ✓





# Reduce the risk of labelling errors



## Labelling & Packing Step 11 of 15 Label artwork

When food labels declare the presence of allergens in an accurate, clear and consistent manner, people with food allergy can quickly and easily identify which foods they can eat.

Regulatory requirements



Declare food allergens



Review label artwork



Allergen Management Program (AMP)



An effective AMP will include procedures in place for the management of product labels and to ensure compliance to regulation.

**Labelling** – Procedures to control the changeover of labels are in place. Internal audits are conducted to verify that the formulation matches the ingredients specified on the label. Procedures for ensuring allergens are labelled as per the Code's requirements are in place.

**Regulation** – Procedures and monitoring practices are in place to ensure compliance with Australian and New Zealand regulatory requirements.



# Communicating change

- Clearly communicating any changes to the allergen status of a product on the front of the pack can assist with alerting consumers.
- In addition to front of pack communications, consider alerting consumers with food allergy through patient support organisations:
  - ✓ Allergy & Anaphylaxis Australia (A&AA)
  - ✓ Allergy New Zealand,
  - ✓ Coeliac Australia/New Zealand



# Reduce the risk of packaging errors



Labelling & Packing Step 12 of 15

## Packaging controls

Any labels or packaging should correctly communicate the allergen status of the food it is attached to.

Version control



Right label on right product



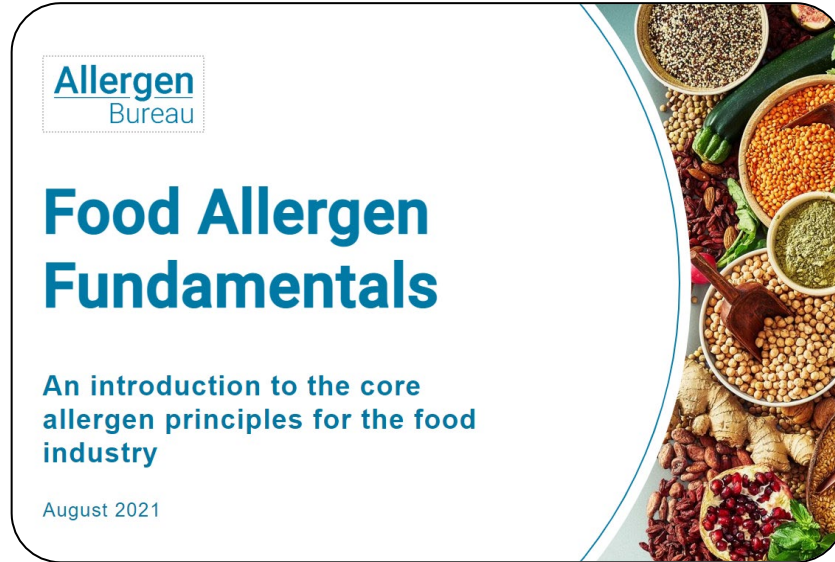
# Key Tools....

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# Industry Guidance



Do your team (including warehouse & logistics operators) understand the risks associated with Food Allergens?

This Food Allergen Fundamentals is a great basic training presentation.

# Essential allergen guidance for ANZ food business operators

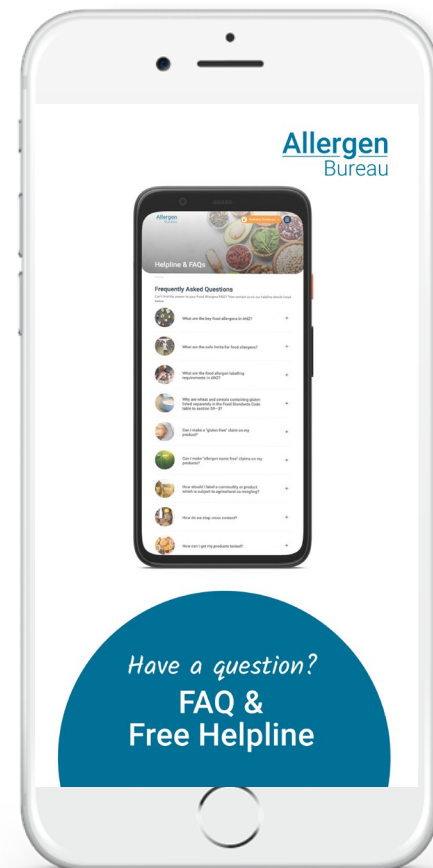
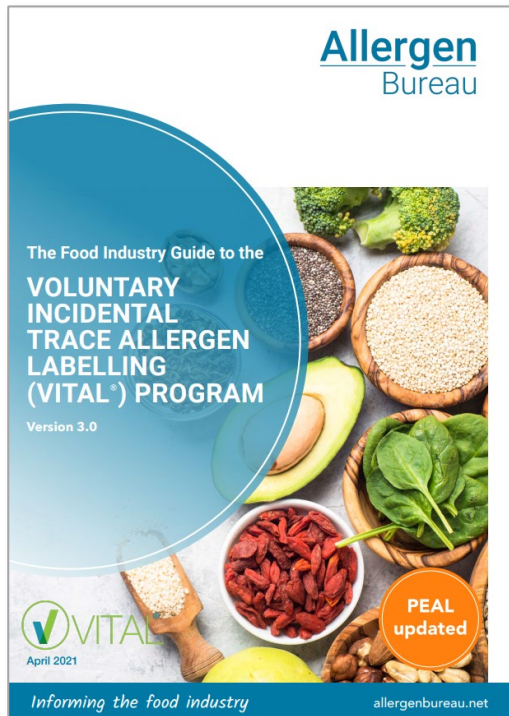


- **Food Industry Guide to Allergen Management and Labelling (FIGAML)** describes industry best practice for the management of allergens, allergen labelling, and allergen communication.
- 2021 edition contains updates for Plain English Allergen Labelling as shown by the orange PEAL logo.



# Industry Guidance

Access via the Allergen Bureau website > [Resources](#)





For the  
Food  
Industry

## Free resources available on our website

Please have a look at

**[allergembureau.net](https://allergembureau.net)**

and VITAL® Online

**[vital.allergembureau.net](https://vital.allergembureau.net)**

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# THANK YOU

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CONTACT US:



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