

Allergen Bureau

Allergen Management to ensure authenticity & safety

Food Safety, Risk and Compliance
Conference - 15 June 2022

Debbie Hawkes

Informing the
food industry



Pepeha

Kia ora tatou

Ko Rangitoto te Maunga

Ko Rotoiti te Roto

No Tāmaki Makaurau ahau

Ko Hawkes toku whanau

Ko Debbie toku ingoa

No reira tena koutou,
tena koutou, tena koutou katoa

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Agenda

- About Us
- Vision and Mission
- Plain English Allergen Labelling (PEAL)
- PEAL Impact on PAL
- International Developments in Allergen Management and Labelling
- Positioning your business to respond to consumer & regulatory demands
- Key Tools



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



- ALDI Stores
- BBF Hull Limited
- SoFine Foods

reau

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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PEAL

Plain English Allergen Labelling

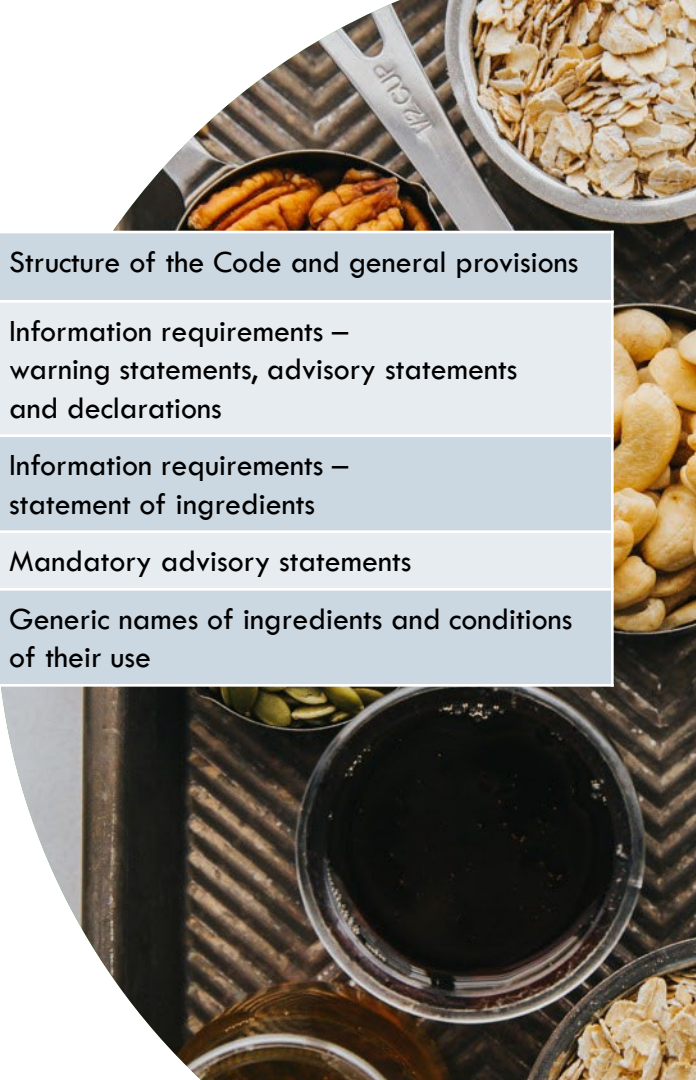
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What is PEAL?

- 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

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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
e.g. “Milk” not “Dairy”
- **Molluscs** & individual (specified) **tree nuts, & cereals**
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



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Updated FIGAML 2021

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

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

Figure 3. Examples of summary statement locations.

Preferred format - the summary statement is below, and ingredients are listed above.

Ingredients Water, vegetable oil, vinegar, potassium (E402), aluminium, flavour wheat, maltodextrin, E605. Contains: egg, almond, milk	Contains: egg, almond, milk
-----------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------

Alternative formats - the summary statement is next to, or above, the ingredients.

Ingredients Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, egg yolk, thickeners (E412), almonds, parmesan cheese (milk), garlic, wheat flour, flavour wheat maltodextrin, sesame oil, antioxidant (E202).	Contains: egg, almond, milk, wheat, gluten, sesame
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------

Alternative format for labels with very limited space - the summary statement is between the statement of ingredients and the summary list of ingredients.

INGREDIENTS: Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, egg yolk, thickeners (E412), parmesan cheese (milk), garlic, wheat flour, flavour wheat maltodextrin, sesame oil, antioxidant (E202).
Contains: egg, almond, milk, wheat, gluten, sesame

Terminology

The required names for summary statements, except for soybean and cereals containing gluten, are the same as those in the statement of ingredients. These are listed in Column 4 of the table to section 59-3. The following example shows how the required name can be presented in a statement of ingredients and summary statement using the required names.

Example: Ingredient list for Frozen Green Vegetable Mix.

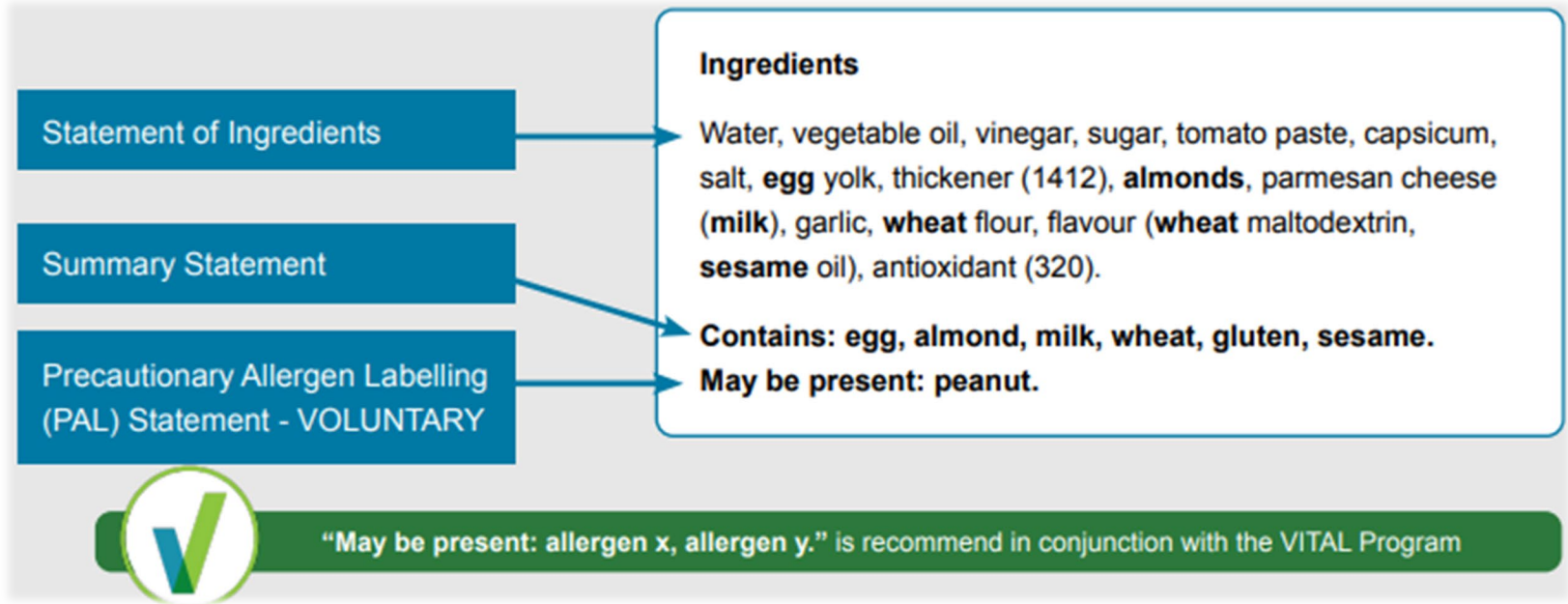
Ingredients Green beans, sugar snap peas, ectamame (soybean). Contains: soy.

Note that soy, soya and soybean are required names in the statement of ingredients, but not in the summary statement where soy is the only permitted required name.



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Recommended Labelling Format – FIGAML



- Incorporates mandatory requirements
- Additional guidance for consistency, for an allergen declaration

What is the VITAL Program?

The VITAL Program provides a consistent methodology for food industry to **assess the impact of allergen cross contact** and provide appropriate precautionary allergen labelling on their products



VITAL is managed by the
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**VOLUNTARY
INCIDENTAL
TRACE
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PEAL Impact on PAL



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Food Standards Code Influences PAL Statements

PAL statements are voluntary and outside scope of the FSC.

Though regulations influence the following for PAL statements:

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

The following examples aim to provide best practice guidance

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Recommended Labelling: 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 of PAL:

- **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*

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*

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

Example 1: *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' in the PAL statement



Example 2: *Muesli bar*

Ingredients:

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

Contains: gluten, almond.

May be present: cashew, walnut.

OR

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

NOTES:

- Thorough allergen risk assessment
- Declare individual tree nuts wherever possible in the PAL statement.
- Consider: is this clear for the consumer?



Example 3: *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.

or

May be present: other tree nuts.

NOTES: Risk assessment has identified 8 tree nuts.

- Is the PAL statement clear for the consumer?
Optional using “Other tree nuts” may be more appropriate to communicate the risk to the consumer.



Questions about PEAL

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Coconut Milk Products *(very on trend)*

- Coconut milk is milk from a coconut, which is NOT cows' milk, and therefore, not an issue for people with milk allergy
 - Coconut is not a tree nut of public health significance
- ⇒ No mandatory allergen labelling requirement for **pure** Coconut milk
- **BUT....** many Coconut Milks contain sodium caseinate, which is from dairy milk and can cause adverse reaction for people with milk allergy. In this case consider how the word “milk” is labelled.

Ingredients:

Coconut milk, sodium caseinate (**milk**).

Contains: milk.





PEAL & Gluten

- No changes to the requirements for “**Gluten free**” claims due to PEAL. (FSANZ [Schedule 4](#))
- PEAL does require Barley, Oats and Rye to have mandatory declaration “*if gluten is present*”. (FSANZ [Schedule 9](#))

Some confusion on how to interpret “*if gluten is present*”

- Very few ingredients, derived from wheat, rye, barley or oats, which do not contain gluten, therefore we recommended assume that gluten is present.
- *Unless*, you can fully apply due diligence principles and take all practical measures to determine if gluten is present or not, including reviewing supplier information, understanding the ingredient processing, testing, and monitoring.

A routine Gluten test would not be sufficient alone to support not labelling

Steps for PEAL Compliance

- PEAL means that a significant number allergen declarations require review
- Check that your Product Information Forms (PIF) / Specifications are up to date?
- Review the implementation of the VITAL Program
- Review allergen management plan
- ***Refer to industry guidance to contribute to consistency in labelling across the food industry***

If you do have any enquiries,
the Allergen Bureau is happy to help

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International Developments in Allergen Management and Labelling

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CODEX

- Many countries adopt fully or partially CODEX Standard – General Standard for the Labelling of Pre-packaged Foods (CODEX STAN 1-1985 rev 2018)
- Since 1999, has included the list of 8 major Foods known to cause hypersensitivity in 1999
- FAO/WHO Expert Consultation on Risk Assessment of Food Allergens started work in Dec 2020 to evaluate “The big 8” and other food allergens based on prevalence, severity of reaction and potency
- All 6 VSEP members invited to join this Expert consultation, which also included regular FAMS speakers.



Food and Agriculture
Organization of the
United Nations



World Health
Organization



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Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens



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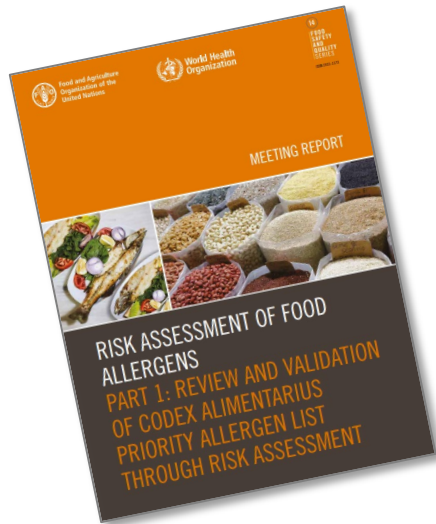


World Health
Organization

[Part 1: Review and validation of Codex priority allergen list through risk assessment](#) (Nov 20 – Feb 21)

[Part 2: Review and establish threshold levels in foods of the priority allergens](#) (Mar 21 – Apr 21)

[Part 3: Review and establish precautionary labelling in foods of the priority allergens](#) (Oct 21 – Nov 21)



- Achieved consensus on recommended revision to global priority allergens
- Established threshold levels for these priority allergens and reviewed available analytical capabilities for the monitoring of food allergens. (ED01 vs ED05?)
- Defined that to be effective, PAL should only be used when the level of Unintended Allergen Presence (UAP), demonstrated through risk assessment, exceeds established risk-based threshold values for a particular food allergen

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CODEX



Food and Agriculture
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World Health
Organization

- Recommended that some allergens such as buckwheat, celery, lupin, mustard, oats, soybeans and Brazil nuts, macadamia and pine nuts should not be included in the CODEX listing and included as required in individual countries
- Watch list for CODEX: insects, pulses, kiwi fruits...



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PAL (Precautionary Allergen Labelling)

- *FAO/WHO Expert Consultation on Risk Assessment of Food Allergens*, recommended the adoption of risk-based PAL, with a single agreed statement, and the prohibition of PAL that are not based on a comprehensive risk-based approach.
- *ILSI Europe Food Allergy Expert Group* has given a positive review on the applicability of the VITAL Program within Europe and accepted the scientific approach used to establish threshold levels for precautionary allergen labelling
- Majority of legislations are silent on PAL statements
 - ✓ Switzerland & Japan require labelling when the allergen exceeds a defined threshold.
 - ✓ South Africa permits PAL statements where it is supported by a documented risk assessment
 - ✓ Argentina prohibits PAL statement.

FALCPA (US) Updates

- Sesame has declared as the 9th major food allergen recognized by the US (Apr-21) and mandatory allergen labelling will come into effect on 1-Jan-23

Other key differences with US legislation –

- ✓ Only include wheat (not oats, rye, barley etc).
- ✓ Coconut is a mandatory allergen and should be included in the allergen management plan if you are processing a US product.
- ✓ Gluten free oats can legally be sold in the US

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Working group on Consumption data

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



Positioning your business to respond to consumer & regulatory demands



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Allergen Labelling – *The consumer perspective*

- Question – Is PAL still helping the consumers?
- A persistent view exists that PAL is applied indiscriminately
- Consumers don't find it useful – will regulation help?
- Proliferation of PAL may drive unsafe consumer behaviours - ignore PAL ?
- Non regulatory response is potentially –
The VITAL Standard

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Allergen Labelling – *The Food Industry perspective*

- PAL is a risk communication statement
- Food industry allergen management is often very well informed and applied using experienced resources
- Clear and consistent PAL is VITAL
- It is the only way to communicate allergen risks
- Key to PAL being effective is robust allergen management risk assessment processes and inputs

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Use Industry Guidance to ensure best practice

- encourages consistency in approach by industry
- confirms your understanding the Code
- assists in navigating the Code
- promotes discussion
- can approach subjects which are challenging to legislate to legislation –
e.g. precautionary allergen labelling (PAL)
- flexible to the needs of stakeholders



Key Tools....



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For the Food Industry

Free resources available on our website

allergenbureau.net

and VITAL® Online

Vital.allergenbureau.net

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Reduce the risk of labelling errors

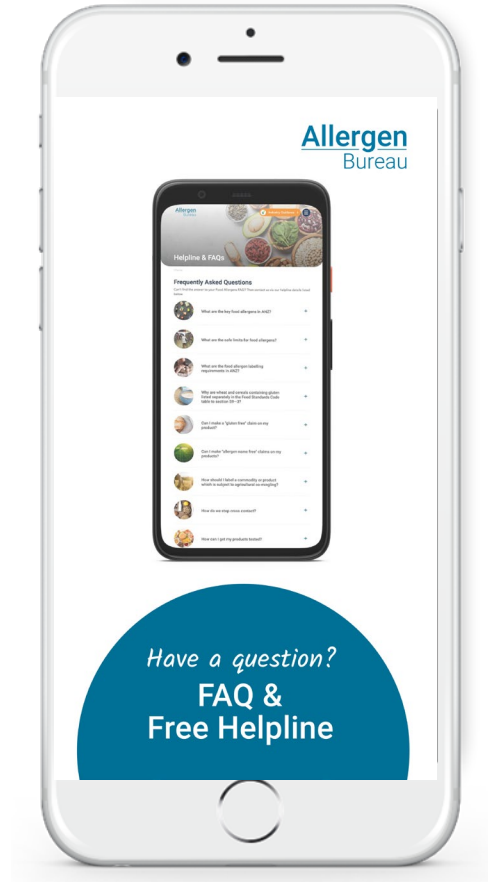
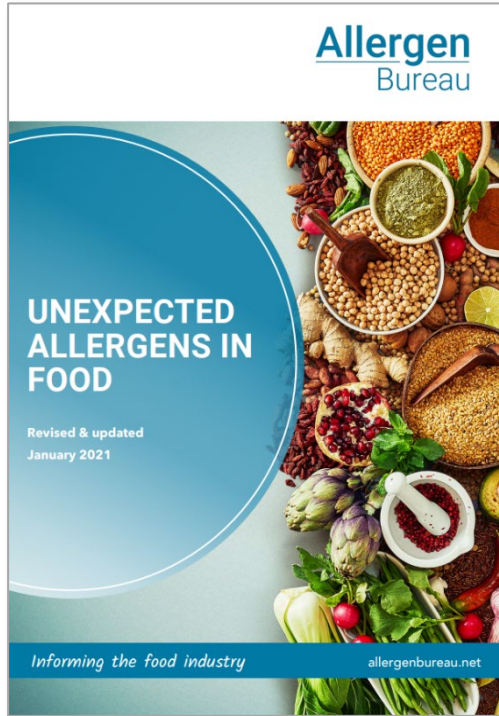
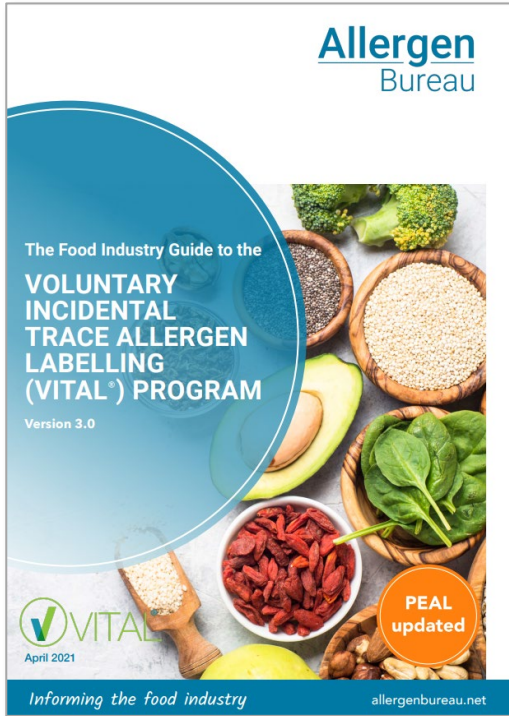
Are you and your suppliers aware of the Allergen Risk Review website?



[Factory Map - ARRW](#)

Industry Guidance

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



The VITAL Standard

- Voluntary
- Consumer visibility
- Cost effective
- Internationally recognised
- Complements a GFSI Food Safety Certification
- Robust
- Product specific
- Auditable

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Other Useful Industry websites

- **MPI:** [Allergen labelling - Knowing what's in your food and how to label it \(mpi.govt.nz\)](http://mpi.govt.nz)
- **FSANZ:** [P1044 – Plain English Allergen Labelling \(foodstandards.gov.au\)](http://foodstandards.gov.au)
- **FSANZ:** [Food allergen portal \(foodstandards.gov.au\)](http://foodstandards.gov.au)
- **CODEX:** [Code of Practice on Food Allergen Management for Food Business Operators](http://www.codexalimentarius.org)



THANK YOU

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