

Annual report

July 2022 – June 2023

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October 2023

Our Vision

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

Our 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.

Introduction

Once again, our thanks go to the wonderful contribution of our volunteer board and to the support of our loyal members. The Allergen Bureau continues to operate to fulfil our Vision and Mission. This year has seen a focus on how we can continue to create new and consistent value for both members and the broader food industry, in an ever-changing global market.

We listened and participated in the global debate around the merits of ED₀₁ vs ED₀₅ as a Reference Dose used for quantitative risk assessment. After many years using Reference Doses in Australia, we paused and reflected on how wonderful it is that global debate has shifted away from zero tolerance and whether risk assessment based on Reference Doses is appropriate, to which Reference Dose value is most acceptable.

The VITAL Scientific Expert Panel (VSEP) continued to support us with the latest science and data, and industry has continued to utilise and adopt the VITAL program producing over 1200 reports in 12 months. We enabled multifactor authentication on VITAL Online to ensure we keep pace with the ever-changing IT world.

Our discussions with global businesses and stakeholders indicated the resources we have developed and made freely available are valuable. Equally valuable is the collaboration that we continue to foster within industry, consumer groups, clinicians, regulators, and enforcement agencies within Australia. The unique climate in which we are fortunate enough to operate has meant that we continue to solve problems with industry-lead initiatives centred on consumer safety, and for that, we can all be very proud.

But of course, with the number of recalls still well over what is desirable, there is more work to do. We thank all members for their support.

Our Strategies – 2021-2025

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

Allergen Bureau Membership

Financial security, through a strong membership base, remains a key imperative of the Allergen Bureau's volunteer Board. The Allergen Bureau thanks all members for their ongoing support, contribution, and encouragement. Our members enable and drive the development and innovation of the Allergen Bureau's resources and tools, and together, we continue to support the food industry in best-practice allergen management and risk communication with consumers.

Allergen Bureau membership grew modestly this year. Membership to the end of June 2023 was 1 Global Member, 45 Full Members, 53 Associate Members and 49 Individual Members – a total membership of 148 food industry companies and individuals dedicated to best practice allergen management.

Table 1. Allergen Bureau membership, last three Financial Years.

Membership	FTE Employees	Financial Year		
		2020-21	2021-22	2022-2023
Full – Global	>100	1	1	1
Full	>100	40	42	45
Associate C	51-100	9	11	10
Associate B	10-50	20	18	21
Associate A	<10	16	20	22
Associate D	Individual	50	46	49
TOTAL		136	138	148

New Members

We welcomed three new Full Members in the 2022-23 membership year:

- IXOM
- Reckitt (RB Corporate Services, UK)
- COYO Pty Ltd

and 7 new Associate Members in the 2022-23 membership year:

- Sensate Pty Ltd
- Facts and Allergy Consulting and Testing Services (South Africa)
- Training & Quality Management Services
- Golden State Foods (NZ)
- Elisa Systems
- KB Seafood Co
- Axel Groupe (France)

Thank you for joining a group of Food Businesses committed to creating trusted brands for allergen-sensitive consumers.

The full list of organisations that are committed to using best practice allergen management practices and tools can be found on the [website](#).

Allergen Bureau activities were reported to members and all stakeholders in the Annual Report distributed by email and posted to the Allergen Bureau website.

1. Evidence based science

VITAL Scientific Expert Panel & FAO/WHO Expert Panel

The VITAL Scientific Expert Panel (VSEP) consists of international scientists and experts specialising in food allergen management, food allergy, and risk assessment. This year we were sad to lose the services of Ben Remington, and we sincerely thank Ben for his commitment to the science that underpins the VITAL Program and wish him well in his new role at the USFDA.

Following the publications of *Ad Hoc* FAO/WHO Expert Panel reports 1-3, the FAO/WHO Expert Panel was asked to develop a process for considering future exemptions of highly refined foods and ingredients derived from or containing a priority allergen food. The summary report is available [here](#). VSEP member Dr Simon Brooke-Taylor was the chair with Dr Joseph Baumert, acting as Rapporteur. The Allergen Bureau has been fortunate to collaborate with international experts, who along with other experts in this field, and through the work of FAO/WHO Expert panel, have in many ways validated the risk-based approach that the Allergen Bureau delivers to the food industry.

Evidence-based science is at the heart of the Allergen Bureau's work, and discussions on the implications to the Australian and New Zealand Food Industry and The VITAL Program of the adoption of an ED₀₅ Reference Dose¹ (as recommended by the FAO/WHO Expert panel to CODEX) continued to be a focus of 2022-23. A round table discussion was held in April in New Zealand, co-chaired by FSANZ. The group explored the various views and challenges that we must consider as we look to transition to ED₀₅ in the VITAL program. We continue to work collaboratively to ensure the challenges are understood, and the risks are mitigated, so that consumers have safe access to the broadest range of foods possible. Aligned communication was identified as a challenge that we must tackle, and the meeting ended with a commitment to create a Precautionary Allergen Labelling consensus paper and statement. Work on this has commenced and will be a focus for F23-24.

Another action from this meeting was to establish the facts surrounding the likely impact on labels from this change. One assumption seems to be that if a PAL is based on a higher Reference Dose, fewer PALs will be used. Our members identified that whilst such an assumption is logical, it does not take into account that PAL's are often driven by potential particulate cross-contact. It is also unknown how many PALs are on packaging because the risk assessment determined the allergen content is above an ED₀₅ derived value. To answer this question the Allergen Bureau committed to commissioning a survey to review risk-based PAL's. This information is critical to the debate, and once again shows our commitment to evidence-based science.

VITAL Program Version 3.0

The 2019 VSEP Recommendations continued to provide the evidence-based science incorporated into the following resources for our members and the global food industry.

- Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL[®]) Program Version 3.0.
- VITAL Standard Version 1.0.
- VITAL Online (Version 3.1.9. at end of F2022-23)

¹ NOTE: The Eliciting Doses (ED) is the dose of the total allergen protein that is predicted to produce objective symptoms in a % of the allergic population). The VITAL 3.0 program currently uses the ED₀₁ Reference Dose, (where 01 refers to 1% of the population). More information is available on the Allergen Bureau website [Summary of the 2019 VITAL Scientific Expert Panel Recommendations](#)

Promoting an evidence-based scientific approach

The Allergen Bureau’s website and our monthly eNews continued to be a focus of our efforts to inform the food industry on science-based approaches to food allergen management.

The number of eNews subscribers on our mailing list remains steady. A slight decline has been noted over the last 3 years. The eNews is distributed as 12 monthly editions and remains committed to bringing information to subscribers on the latest thinking in food allergen science and information on consumer and industry challenges.

Table 2. Allergen Bureau eNews last three Financial Years.

	Financial Year		
	<u>2020-21</u>	<u>2021-22</u>	<u>2022-23</u>
eNews subscribers	8,950	8863	8550
# allergen science articles /year	25	24	23
# allergen guidance/regulatory articles / year	N.A.	N.A.	14

2. Best practice allergen management guidance and resources

The Allergen Bureau has continued to collaborate with AFGC, FSANZ, food enforcement authorities, and key stakeholders in relation to questions and inquiries we receive.

Plain English Allergen Labelling & FIGAML

The Food Industry Guide to Allergen Management and Labelling (FIGAML) guidance document has been updated to provide more detail regarding the labelling of gluten in a summary statement, and the approaches that should be used to establish the absence of gluten. Additional information on sulphites has also been included. The Allergen Bureau also participated in a Plain English Allergen Labelling (PEAL) webinar with FSANZ and the NSWFA to help answer questions still held by industry surrounding the change in legislation and the resources available to assist businesses in meeting the changeover deadline.

Assessing Agricultural Cross Contact and Unexpected Allergens

Following the launch of the Agricultural Cross Contact documents, the Unexpected Allergens document was reviewed and updated this year. Both documents remain popular, particularly with international audiences as they grapple with determining the risk of unexpected allergen presence in ingredients or the need to approve ingredients quickly as supply issues emerge.

Allergen Risk Review Website

We have also promoted our [Allergen Risk Review Website](#), which continues to be referenced in local and global education materials. We encourage all businesses - large or small - to use the interactive factory map plus the associated processes linked to production to look for answers and advice on best practice allergen management.

Other valuable resources in the making

- Substrates used in fermentation - we have continued to consult on emerging fermentation processes to inform the guidance being developed to assist in assessing the allergen status of foods and ingredients derived by fermentation.
- A guide for allergen labelling of VEGAN products is also in development.

Allergen Bureau Website

All these valuable resources and many more are available in one place – on the Allergen Bureau website resources page. [Allergen Bureau Resources](#)

Table 3. Our website statistics², Comparison between F22 and F23

Financial Year		
	<u>2021-22</u>	<u>2022-23</u>
<u>Allergen Bureau website</u>		
Unique website visitors	35,000	19,000
Website sessions	45,500	25,200
Website page views	166,500	95,300
<u>Allergen Risk Review website</u>		
Unique website visitors	1,300	800
Website sessions	1,800	1,100
Website page views	8,900	5,200
<u>VITAL Online website</u>		
Unique website visitors	6700	4800
Website sessions	17,200	16,000
Website page views	194,100	214,400

It is noted that Allergen Bureau and Risk review website visits have reduced. There are multiple possible causes linked to lower social media advertising Q4, familiarity with the website, downloading of content of interest, or static content. We continue to assess the design and content of our website to ensure maximum awareness of our organisation and resources. It is very pleasing to see VITAL page views have increased, suggesting information on the VITAL program and VITAL science continues to be of importance to industry.

Allergen Bureau Working Groups and focus areas

Allergen Bureau Working Groups are resourced and led by Allergen Bureau member company volunteers and an Allergen Bureau Management Committee Member provides support to each Working Group.

² Non-bounce sessions. In a non-bounce session, the person interacted with the entrance page. Bounce sessions occur when the person leaves the website from the entrance page without interacting with the page. Website statistics are rounded to the nearest one hundred.

Based on the FAO/WHO Expert Committee recommendations, the Allergen Bureau has been exploring the use of standardised Reference Amounts for product categories, based on a dietary consumption data, set at a p50. It is hoped the ability to use this data in VITAL risk assessments, will assist in further industry standardisation of the process, both locally and internationally.

We have also continued our journey to solve the problem of consumers not knowing whether a product has been properly risk assessed for unexpected allergen presence, by working to update the VITAL Standard and develop a VITAL Certification Trademark. Further collaboration with industry is required in this area as we look at how to solve the problem and potentially showcase the excellent allergen management plans and risk assessments Industry is utilising.

Technical and VITAL helpline support

The Allergen Bureau provides free priority Helpline services to our members, and to non-members on a case-by-case basis, providing expert advice on enquiries regarding general allergen management and the VITAL Program.

Labelling of cereals / gluten in ANZ under PEAL and questions surrounding Gluten Free claim use, together with questions on advice on how to label sulphites are amongst the most frequent labelling questions. It is pleasing to see industry embracing the concept of Allergen Risk Assessment and the VITAL program and we encourage everyone to keep working diligently in this space.

Table 4. Technical and VITAL helpline support, last three Financial Years.

Financial Year			
<u>Helpline enquiries requiring expert response</u>	<u>2020-21</u>	<u>2021-22</u>	<u>2022-23</u>
General allergen management enquires	41	61	68
VITAL “how to” enquiries	76	32	20
<u>TOTAL</u>	<u>117</u>	<u>93</u>	<u>88</u>

VITAL Training

VITAL training supports industry understanding and implementation of the VITAL Program; the VITAL Standard; and VITAL Online. There are currently 23 VITAL Training Providers across Australia, New Zealand, and internationally. We welcomed new Training Providers from Italy and Argentina.

A total of 315 people were trained in VITAL science in F22-23 with 63% of these ANZ and 37% international.

Members are encouraged to contact individual VITAL Training Providers to discuss their VITAL Training needs. A full list is available on our [VITAL Online Website](#).

Allergen Bureau Awards

The ‘Julie Newlands’ Award promotes and raises awareness of best-practice food allergen management in Australia and New Zealand. The award seeks to encourage all food industry sectors to adopt a consistent, science-based approach to food allergen risk assessment, management, and communication for the benefit of the allergen-sensitive consumer. Award recipients gain international recognition for their demonstrated commitment to food allergen management.

The Award criteria were revamped in F22-23. Nominations are judged against 4 criteria:

- Demonstration of organisational best practice

- Demonstration of consumer benefit
- Evidence of industry leadership
- Evidence of organisational leadership.

The award has been amended to be an ANZ Biennial award aligning with the Food Allergen Management Symposium (FAMS).

We encourage all members to consider the improvements they implement, the allergen management programs they run, and to be brave enough to nominate. This is a very important way for the Food Industry to demonstrate to stakeholders outside of the food manufacturing sector, the care and commitment undertaken in managing and communicating allergen risks. The next Julie Newlands Award will be awarded in 2025.

3. Key stakeholder acknowledgment

Codex Committee on Food Labelling Electronic Working Group on Food Allergen Labelling

The Allergen Bureau continues to provide comment – via both the Australian Department of Agriculture and MPI New Zealand – on Codex consultation papers regarding provisions relevant to allergen labelling in the General Standard for the Labelling of Prepackaged Foods (GSLPF).

Australia New Zealand Food Allergen Collaboration

The purpose of the ANZ Food Allergen Collaboration (established by FSANZ) is to strengthen engagement and collaboration amongst key stakeholders. It is intended to provide a means of sharing information and developing common approaches to enhance the effectiveness of risk management of food allergens, with the objective of supporting consumers to make safer food choices.

The Allergen Bureau is an active member of the Allergen Collaboration steering meetings, held by teleconference, and an active participant of the wider meetings.

Publications

Director Jasmine Lacis-Lee together with Dr Simon Brooke-Taylor and Allergen Bureau Manager Lisa Clark published '[Allergens as a Food Safety Hazard: Identifying and Communicating the Risk](#)' as one of the stand-alone chapters in the Elsevier Reference Collection in *Food Science*. The full 2nd Edition Food Safety Encyclopedia is expected to be published in 2023.

Articles were also published in several technical and industry magazines discussing best practice allergen management, risk assessment and communication, and the importance of the VITAL® program, emphasising the core principles of 'Eliminate, Reduce, and Control' that underpin the program.

Allergen Testing Special Interest Group (AT-SIG)

The Allergen Testing Special Interest Group (AT-SIG) is a collaborative initiative of the Allergen Bureau and the National Measurement Institute (NMI) that aims to provide coordinated advice on food allergen analysis and testing within Australia. Two meetings were held with interested parties this year.

FSANZ, MPI & Australian Enforcement Agencies

To ensure that the Allergen Bureau considers all aspects of its programs and resources, collaboration with key regulatory and enforcement agencies continues in areas such as the future of legislation, the

application of Reference Doses in PAL and further guidance on allergen labelling during the implementation phase of PEAL. Many of the initiatives and resources developed in the last year have involved significant engagement with these organisations.

4. Global influence and brand recognition

5th Food Allergen Management Symposium (FAMS2023)

The 5th Food Allergen Management Symposium was held in Brisbane in May 2023. It assembled some of the best international and locally renowned experts in Food Allergen Science to discuss and debate how best-in-class clinical, analytical, and practical approaches can be used to create a trusted food supply for allergen-sensitive consumers.

The event is unique in providing a 360° view of all the challenges and the impact of the approaches taken in various areas to positively impact the quality of life of consumers. For those attending it was a chance to understand the consumer lens, but also to present the significant work that is being done by our members to ensure food allergens are managed and labelled correctly and to learn from each other.

The symposium challenged stakeholders to discuss gaps that still existed and needed to be acknowledged. The presentations and panel discussions provided an opportunity to discuss the milestones already reached, the good work being done, along with what more could be done to improve outcomes for those with food allergy, whilst allowing stakeholders to gain an understanding of the complexities that exist in each discipline.

The symposium is a significant biennial event in our calendar and draws much of our attention, funding and focus. We could not hold this internationally recognised event without the support of our sponsors R-biopharm, BVAQ, Elisa Systems, FARRP, ALS Food and Pharmaceuticals, Biosys Australia, Neogen, Hygiene and Romer Laboratories.

For a successful conference, we also need a wide array of industry representatives to attend, so that they learn and develop knowledge in this important area. Please be sure to save room in your budgets and diaries to sponsor and have employees attend the event in 2025.

Industry presentations

The Allergen Bureau remained active in industry-targeted communication, presenting at many industry events, predominantly via webinars.

All the following presentations are available on our website page [Conference Presentations](#)

- *What the FAO : WHO needs to know about what the Allergen expert panel said*, presented by Debbie Hawkes, Allergen Bureau, and Hawkins Watts at NZIFST (July 2022)
- *Assessing Agricultural Cross Contact*, presented by Jasmine Lacis-Lee, Allergen Bureau and BVAQ, – AIFST (August 2022)
- *What is the VITAL® Program* – presented by Jasmine Lacis-Lee, Allergen Bureau and BVAQ, and Comaine Van Zijl FACTS South Africa Webinar (August 2022)
- *Agricultural Cross Contact – Assessing the risk and Impacts to Allergen Management*, presented by Jasmine Lacis-Lee, Allergen Bureau and BVAQ - Food Safety and Security Conference (September 2022)
- *Agricultural Cross Contact. The new resources development and use*, presented by Jasmine Lacis-Lee, Allergen Bureau and BVAQ Webinar, Jo Price HJ Langdon, - (October 2022)

- *Allergen Bureau resources to assist with your risk assessments*, presented by Jasmine Lacis-Lee, Allergen Bureau and BVAQ and Clare Winkel ICS – Allergen Bureau/ICS Webinar (Feb 2023)
- *Best Practice in Designing Gluten Free products*, presented virtually by Georgina Christensen, Allergen Bureau - Healthy Food Asia – Free From (March 2023)
- *Precautionary Allergen Labelling: What Lies Ahead*, Participation by Jasmine Lacis-Lee, Allergen Bureau and BVAQ - AFFIDIA TALKS March 2023
- *The VITAL Program*, presented by Jasmine Lacis-Lee, Allergen Bureau and BVAQ – Food Fakty eFORUM – (May 2023),
- *FAMS Conference Presentations* – Various presenters who consented to share content. (May 2023)
- *How the Allergen Bureau assists recall mitigation*, presented by Jasmine Lacis-Lee, Allergen Bureau and BVAQ - GS1 Recall Bootcamp (May 2023)

We thank all collaborators and contributors for helping make these industry events possible.

With the help of Allergy and Anaphylaxis Australia the Allergen Bureau also attended and exhibited at two Food Service Exhibitions in Melbourne and Sydney.

Marketing and Communication

The Allergen Bureau continued to drive our global influence and brand recognition with a strong marketing and communication presence on relevant social media platforms – Facebook; LinkedIn; Instagram; and Twitter (although the latter was not a focus). The social media strategy is to drive traffic to the Allergen Bureau website resources to help promote our work and raise awareness of our suite of industry best practice guidance resources. While we have seen significant growth both paid and organic across FB, LinkedIn and Instagram (off a smaller base) and paid content, LinkedIn remains our strongest platform, with continued growth even without advertising boost. 'New news' and new resources will help drive more traffic to the website. Social media will be a key tool in leveraging and promoting key campaigns, and ad spend will be required to increase following and engagement linked to targeted outcomes. We will continue to look at new campaign ideas to drive engagement and interaction in 2023 and 2024 planning.

Our revised Strategic Plan in development will be linked specifically to key marketing objectives and activations.

Table 5. Allergen Bureau social media followers, last three Calendar Years

Platform	Calendar Year		
	<u>2021</u>	<u>2022</u>	<u>YTD 2023</u>
Facebook followers	777	1019	6100
LinkedIn followers	431	1064	2011
Instagram followers	54	147	211

5. Good governance and financial sustainability

Allergen Bureau Strategic Plan 2021-2025

The Strategic Plan 2021-2025 continues to steer the Allergen Bureau's objectives, budgets, and operational schemes. It serves as a dynamic, 'living document.' During 2023, the Allergen Bureau

concentrated on a comprehensive strategic review, with a specific focus on our value proposition, both on a global and local scale. This analysis informed our strategies for maintaining a positive impact and expanding our relevance. We thank those who actively participated in the insightful sessions held over two days earlier this year. Naturally, this process unveiled several additional areas of potential growth. In August 2023, the Board convened to evaluate the feedback, reaching a consensus that the current strategy remained fitting. However, it was identified that there is an opportunity to intensify our focus in some areas including education and food industry advocacy with consumers. At present, the Board is in the process of revising specific elements of the strategy and establishing priority areas for the next three years. The refined strategy is currently in development, and the recommended changes will be communicated to all members once this work reaches completion.

The Board also continued its focus on risk management in 2022/23. Funding was approved for penetration testing of our online environment to ensure that IT security is keeping pace in an ever-evolving landscape. The major change recommended, and implemented, was the need for multifactor authentication to access VITAL Online. The dynamic nature of IT risks has resulted in increased budget allocation to manage this important area. As such, it is critical that our members and VITAL subscribers also adhere to best practice data management and online security principles.

The Allergen Bureau considers the correct application of the program and VITAL Online outcomes to be critical. As with all software, programming bugs can occur and therefore the Allergen Bureau has committed further investment in software performance measures in the coming year. We thank all members who ask questions and bring issues to our attention and remind all users of their responsibility to ensure outcomes accurately reflect knowledge of the product and process.

10th Annual General Meeting and Member Meeting

The 10th Annual General Meeting of the Allergen Bureau was held on 27 October 2022. The AGM was attended in person and online by representatives of 17 Full Members, and 3 Associate Members.

The 10th^h AGM was followed by a Member Meeting, including presentations by guest speakers:

- David Lowry - **Lowry Food Consulting /Chairperson EHEDG NZ Regional sector.**
- Maria Said OAM – **Allergy and Anaphylaxis Australia**
- Dr Simon Brooke Taylor – **Brooke-Taylor Consulting, VSEP, FAO/WHO Expert Panel Member**

Allergen Bureau Board

The Allergen Bureau Board up to the 10th AGM was:

Elected Directors

Jasmine Lacin-Lee (re-elected 26/10/2022), President
Caroline Gray (re-elected 26/10/2022), Vice President
Debbie Hawkes (continuing), Treasurer
Paul Kelly (continuing), Company Secretary

Invited Directors

Dean Stockwell (reappointed 27/10/2022)
Kirsten Grinter – (reappointed 27/10/2022)

These Directors provide voluntary, unpaid services to the Allergen Bureau and we gratefully acknowledge the generous support they and the Allergen Bureau receive from their employer companies in this capacity.

The Allergen Bureau Board held five Board meetings during 2022-23.

Allergen Bureau Management Committee

The Allergen Bureau Management Committee was:

- Kirsten Grinter
- Caroline Gray
- Debbie Hawkes
- Jasmine Lacin-Lee
- Paul Kelly
- Lisa Clark, Allergen Bureau Manager
- Tom Lewis, Allergen Bureau Advisor

The Management Committee are responsible for planning and management of Allergen Bureau activities according to the annual operating plan and budget.

The Allergen Bureau Management Committee held 17 meetings during 2022-23.

Fortnightly Management Committee operational teleconferences remain the mainstay of how the Allergen Bureau operates. Out-of-session discussion, generally by e-mail, constitutes a large proportion of Allergen Bureau management and operational communication.

Secretariat and Support

The Board would like to thank Dr Tom Lewis, Lisa Clark, and Alice Doyle for their ongoing support in the provision of secretariat, financial and management services.

The Board also thank our support service providers: Dr Simon Brooke-Taylor (Scientific & Technical Support and VSEP representation); Georgina Christensen (VITAL Coordinator); Dr Lyn Davies (eNews); Natalie Hayllar (Marketing and Communication); Progressive Content (website content and EDMs); and Ionata Digital (website development and service) who all made significant contributions to the success of the Allergen Bureau.

Financial sustainability

Audited financial statements and notes, prepared in accordance with the *Corporations Act 2001*, give a true and fair view of the financial position at 30 June 2023 and of the performance for the year of the Company in accordance with the accounting policy described in the financial statements. These are prepared and presented to members separately.