

Allergen Bureau

Managing Food Allergens in the Food Sector

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BSI Webinar
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Informing the
food industry

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
- BFF Hull Limited
- SoFine Foods

Best Practice Allergen Management Considerations



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Allergen Risk Review and Website

- 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.
- Includes 15 different areas which can impact on the status of a food.
- Here you can find detailed information about assessing allergen risk at every stage of the process to make food.
- Can help inform your own allergen control plan.



Easy
Step-by-step
Industry
Guidance

info.allergenbureau.net

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Allergen Management

- The procedures, policies and practices put in place to manage allergens
- Allergen management is a fundamental element of a food safety plan and Good Manufacturing Practice (GMP)
- Use a HACCP plan with allergens included as an independent category of food hazard
- Include the “life-cycle” of the product from raw materials, every step of production, and labelling & packing
- Establish systems to prevent unintentional cross contact for allergens to other products



HACCP based food safety program adapted for allergen control

- applying classical tools of HACCP does not fit for allergens and requires adaption
- document allergens in HACCP plans
- **identify allergen CCPs**, develop and implement allergen control plans
- all allergens requiring mandatory declaration are classified as high risk
- Allergen controls are required in the prerequisite programs
- audit and update periodically

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AMP are unique to each site / company

- Approach to risk is unique to every company/site/product & this will be reflected in the AMP
- Consider
 - who is the target market?
 - complexity / simplicity of the manufacturing site
 - the number of allergens on the site
 - spectrum (which allergens)
 - form of the allergen
 - load of the allergen protein

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Where are the largest risk?

- Ingredient not to specification
- Wrong ingredient used
- Cleaning not performed
- Cleaning not effective
- Wrong product in the wrong pack
- Wrong meal to the wrong consumer



FOOD & GROCERY Allergen Bureau

4.1 ALLERGEN LABELING BEST PRACTICE

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

PEAL updated

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



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UNEXPECTED ALLERGENS IN FOOD

Revised & updated August 2022

Informing the food industry | allergenbureau.net

Free Resources for Industry

Unexpected Allergens in Food provides the food industry with a list of foods, ingredients and raw materials that may unexpectedly contain allergens.

Download at allergenbureau.net

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ASSESSING AGRICULTURAL CROSS CONTACT

Revised August 2022

Informing the food industry | allergenbureau.net

Free Resources for Industry

The guide assists industry to identify and manage agricultural cross contact risk.

Download at allergenbureau.net

Food allergen management guidance – for industry by industry

Food allergen management, labelling, and the VITAL Program

NEW Corporate Website

NEW VITAL Online Website

Resources for the Food Industry

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RAW MATERIAL BEST PRACTICE QUESTIONNAIRE

| Raw Material | Best Practice | Questionnaire | Score | Comments |
|--------------|---------------|---------------|-------|----------|
| Wheat | ... | ... | ... | ... |
| ... | ... | ... | ... | ... |

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Risk assessment

The scientific evaluation of known or potential adverse health effects resulting from human exposure to foodborne hazards (Codex).

A risk assessment for allergen cross contact should determine whether the cross contact is present in a food at levels that may trigger an allergic response.

Conducting a VITAL[®] risk assessment using the VITAL Program principles is an example of a science-based risk assessment for allergen cross contact.





Accurate & Consistent Allergen Declaration

- Allergen labelling is the key method to inform a consumer of the allergen status of a product
- Appropriate allergen declaration can:
 - help allergenic consumers choose foods which do not present a personal health risk
 - positively affect a consumer's relationship with a brand
 - avoid additional compliance costs
 - avoid allergen-related product recalls & other costs

Why was the VITAL Program Developed?

- To provide a consistent method to **assess** and **declare** allergens which are not intentionally formulated into a product
- To address the needs of and protect allergic consumers
- To respond to a regulatory background where there are no regulations for assessing or declaring cross contact allergens
- Global harmonized thresholds for cross contact allergens & best practice approach for cross contact allergen risk assessment



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The VITAL Program in Australia, New Zealand & the world

- Adopted by food business operators on a **voluntary** basis – widely used in Australia & New Zealand
- VITAL 1.0 was released in 2007
- The VITAL Program is well-known in Australia and New Zealand & acknowledged by regulatory and enforcement agencies for role as a voluntary industry guide
- The VITAL Reference Doses and the concept of Action Levels are used by regulatory and enforcement agencies in other parts of the world also

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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
Allergen Bureau

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What do you need to Implement the VITAL Program?

An Allergen Management Plan includes the procedures, policies and practices contributing to the control of allergens within a food business.

ALLERGEN
MANAGEMENT
PLAN



A robust allergen management plan is a pre-requisite before considering implementing the VITAL Program

CODEX - GSLPF

- Many countries adopt fully or partially CODEX – General Standard for the Labelling of Pre-packaged Foods (GSLPF) – [CODEX STAN 1-1985 rev 2018]
- Since 1999, GSLPF has included the list of 8 major Foods known to cause IgE-mediated food allergy.
- Questions were raised by Codex Committees on Food Labelling (CCFL) and on Food Hygiene (CCFH)
- **Ad Hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens** started work in Dec 2020
- All 6 Vital Scientific Expert Panel (VSEP) members were invited to join this Expert consultation, and also included other regular FAMS speakers.



Food and Agriculture
Organization of the
United Nations



World Health
Organization



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Ad Hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens was asked to

1. Validate and update the list of foods and ingredients in the GSLPF based on risk assessment;
2. Establishing threshold levels in foods of the priority allergens;
3. Evaluate the evidence in support of precautionary labelling.

Food and Agriculture Organization of the United Nations | World Health Organization | 14 FOOD SAFETY QUALITY SERIES


MEETING REPORT



RISK ASSESSMENT OF FOOD ALLERGENS
PART 1: REVIEW AND VALIDATION OF CODEX ALIMENTARIUS PRIORITY ALLERGEN LIST THROUGH RISK ASSESSMENT

Food and Agriculture Organization of the United Nations | World Health Organization | 15 FOOD SAFETY QUALITY SERIES

MEETING REPORT



RISK ASSESSMENT OF FOOD ALLERGENS
PART 2: REVIEW AND ESTABLISH THRESHOLD LEVELS IN FOODS FOR THE PRIORITY ALLERGENS

Food and Agriculture Organization of the United Nations | World Health Organization | 16 FOOD SAFETY QUALITY SERIES

MEETING REPORT



RISK ASSESSMENT OF FOOD ALLERGENS
PART 3: REVIEW AND ESTABLISH PRECAUTIONARY LABELLING IN FOODS OF THE PRIORITY ALLERGENS

CODEX ALIMENTARIUS
 INTERNATIONAL FOOD STANDARDS

Food and Agriculture Organization of the United Nations | World Health Organization

CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS
 CXG 69-2020
 Adopted in 2020.

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Part 1: Review and validation of Codex priority Allergen list through risk assessment

- Recommended global priority allergens should be limited to:

- ✓ Cereals containing gluten (i.e., wheat & other Triticum species, rye & other Secale species, barley & other Hordeum species & their hybridized strains),
- ✓ Crustacea
- ✓ Eggs
- ✓ Fish
- ✓ Milk
- ✓ Peanuts
- ✓ Sesame
- ✓ Specific tree nuts (almond, cashew, hazelnut, pecan, pistachio and walnut).

- Recommended that some allergens such as: buckwheat, oats, celery, lupin, mustard, soybeans and Brazil nuts, macadamia and pine nuts **should not** be included in the CODEX listing, but instead included as required in individual countries

-  Watch list for CODEX: pulses, insects, kiwi fruit...





Part 2: Review & Establish Threshold Levels in Foods of Priority Allergens for Use in PAL

- ✓ Based around a Reference Dose (RfD) approach similar to VITAL 3.0
- ✓ Use Eliciting Dose ED05.
(Up to 5% of reactions at both ED01 & ED05 could be classed as anaphylaxis, but none were severe.)
- ✓ Simplify RfD by rounding ED05 down to 1 significant figure.
- ✓ Analytical results to be standardised as mg total protein of allergenic food per kg of food.

Part 3: Review and Establish Precautionary Labelling in Foods of the Priority Allergens

- PAL only when Unintended Allergen Presence (UAP), cannot be prevented and exceeds RfD
- Provide label indication (e.g. using a symbol) that a qualified RA has been done, irrespective of RA outcome
- If RfD not established for a particular priority allergenic food, an estimated RfD can be used
- Compliance with existing Codex codes of practice, good allergen management are a prerequisite, to ensure that the level and frequency of UAP is minimized
- PAL to the consumer should be simple, clear, unambiguous and not false or misleading, with use of a single unified and harmonized wording, and thus “**is not suitable**” for them.
- Education of allergic consumers and other relevant stakeholders is critical, to ensure understanding of the applied principles and the implications of the chosen phraseology



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Allergen Management & Labelling



1. ALLERGEN MANAGEMENT

The procedures, policies and practices put in place to manage allergens



2. ALLERGEN RISK REVIEW

Thorough investigation of the allergen status of a food including cross contact



3. ALLERGEN COMMUNICATION

Forming an ingredient list and risk communication.

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THANK YOU

Don't forget to tell your ideas about this presentation and share it with us!

CONTACT US:



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