

Allergen Bureau

Food Allergen Labelling & Management, what lies ahead?

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FTAA Webinar
22nd June 2023

A photograph of a man in a light blue shirt and grey jacket standing in a supermarket aisle. He is looking at a product on a shelf and holding a smartphone. The aisle is filled with various food products on shelves.

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
- 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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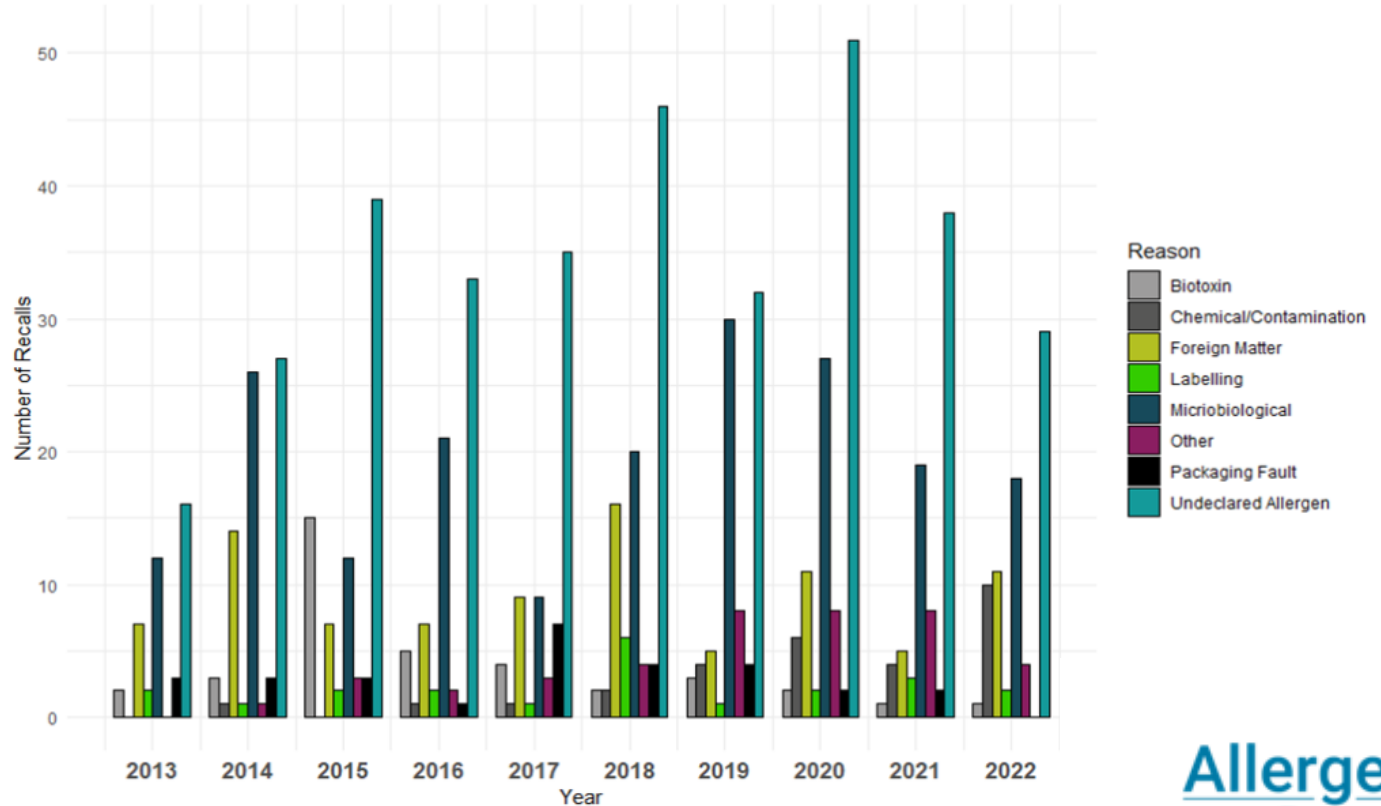
A quick update on the 2022 Recall Data



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FSANZ food recalls by classification 2013-2022

Figure 4. Recalls by year and recall classification 2013 – 2022

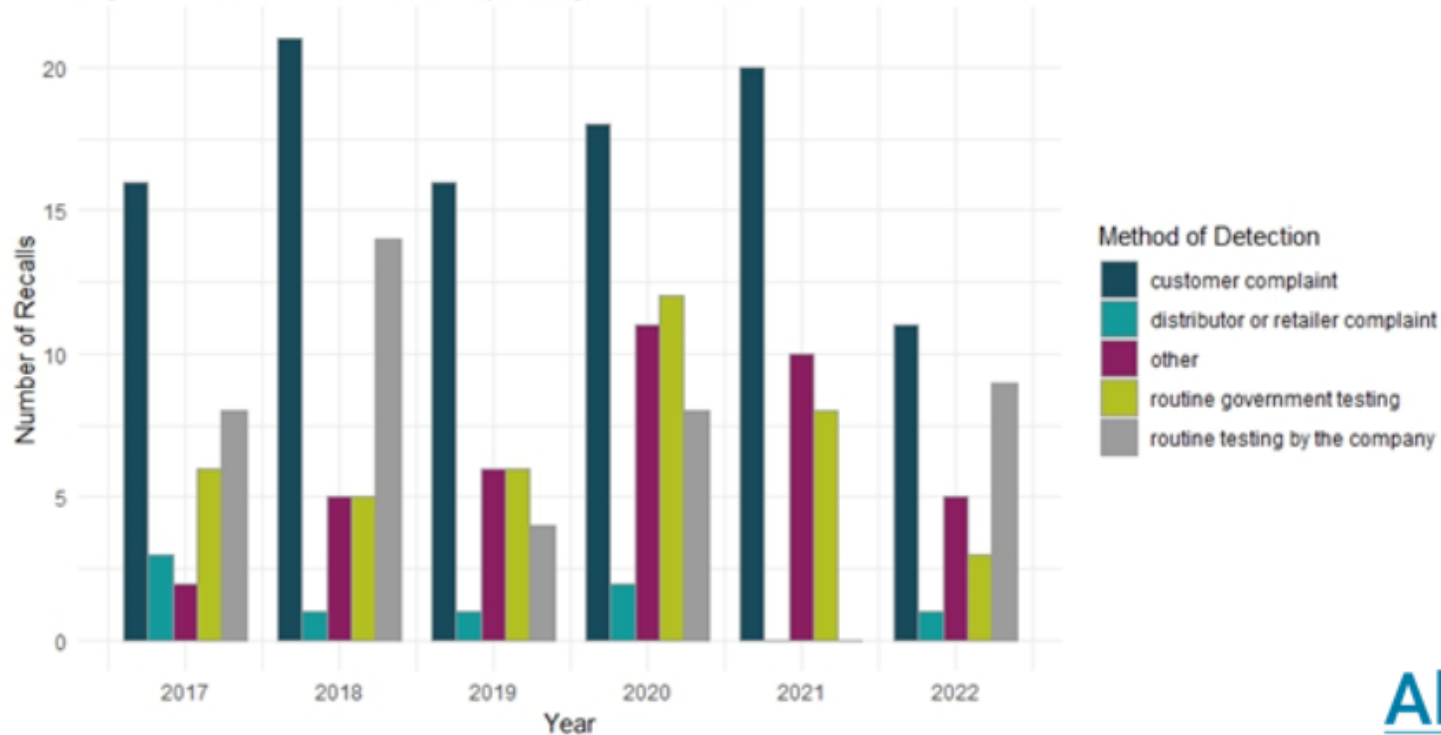


Types of products impacted:

- Free from claims
- Vegan claims
- Imported products

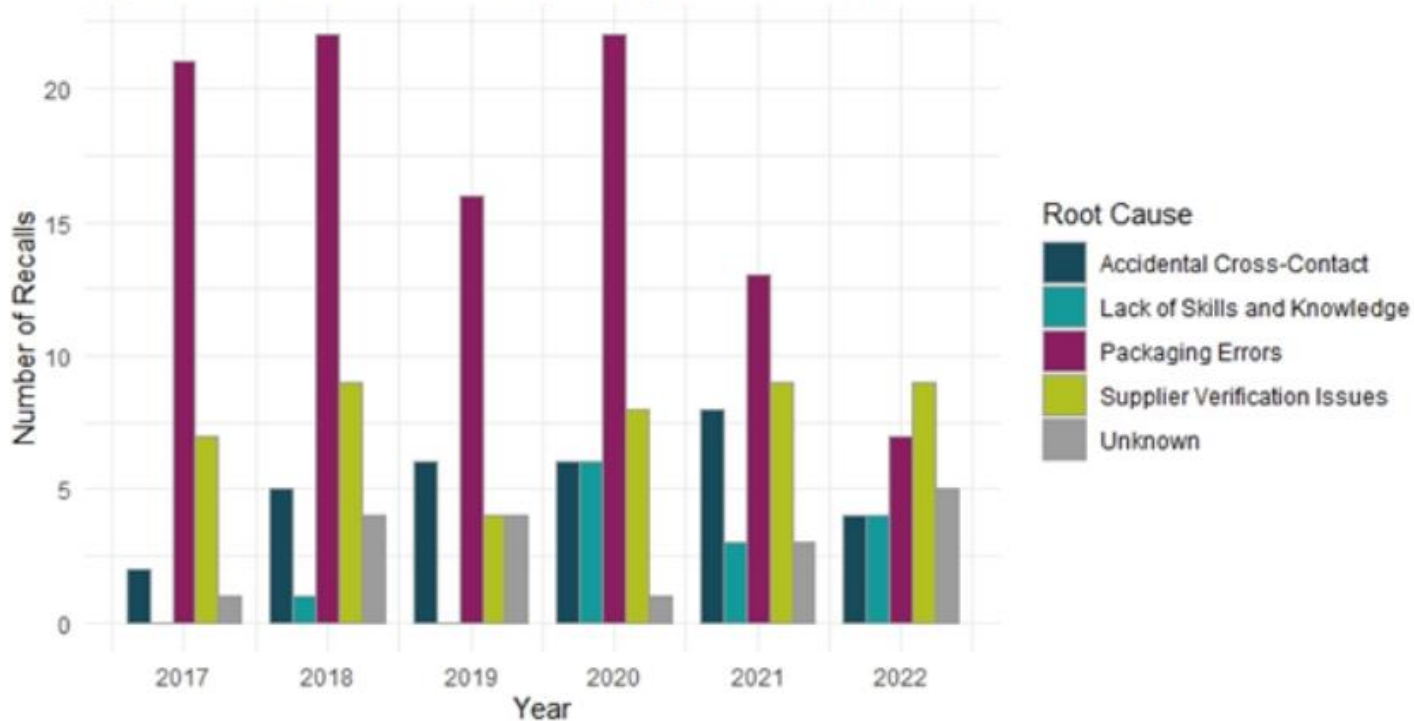
Problem detection for undeclared allergen recalls

Figure 1. Number of Recalls by Allergen Detection



Root cause for undeclared allergen food recalls

Figure 2. Number of Recalls by Allergen Root Cause



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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News Resources Available

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Allergen Labelling

The next chapter



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:

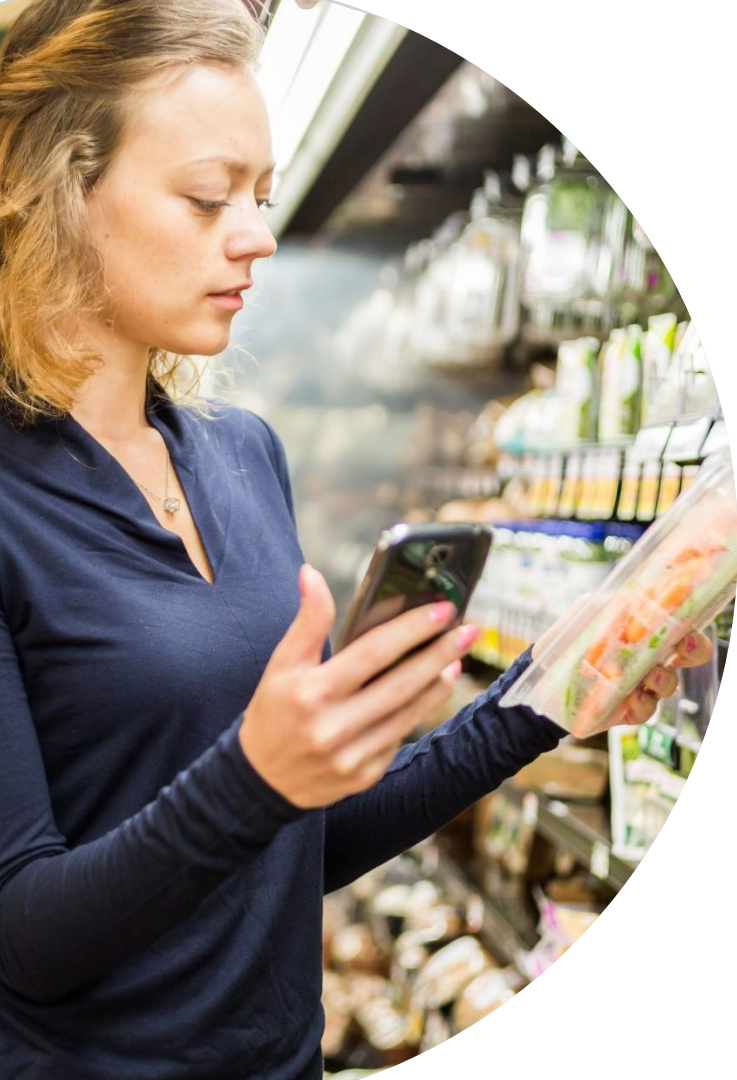
Review and validation of Codex priority Allergen list through risk assessment

Are the criteria for assessing additions and exclusions still current and appropriate?

And therefore:

- Are there foods that should be added or deleted from the list?
- Clarification of allergen groupings?
- Can certain foods, such as highly refined foods, be exempted from mandatory declaration?





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

Evaluated “The Big 8” and other food allergens based on 3 criteria:

- ✓ community prevalence
- ✓ severity (objective reactions to a food/ingredient such as anaphylaxis)
- ✓ potency of food/ingredient (amount of the food/ingredient required to cause objective symptoms).

Part 1: Recommendations

- 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**

1. What are the threshold levels for the priority allergens below which the majority of allergic consumers would not suffer an adverse reaction?
2. For the priority allergens, what are appropriate analytical methods for testing food and surfaces?
3. What should be the minimum performance criteria for these different analytical methods?



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

Four approaches were considered:

1. Analytical-based –
similar to approach currently in Switzerland & Japan
2. No Observed Adverse Effect Level [NOAEL] +
Uncertainty Factor [UF] – *VITAL 1*
3. Benchmark Dose combined or not with the application of a
Margin of Exposure - *VITAL 2.0 & 3.0*
4. Probabilistic Hazard Assessment –
option 3 with a probabilistic modelling overlay



Part 2: Recommendations

- ✓ 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 2: Recommendations – VITAL 3.0 vs ED05

	RfD Recommendation (mg total protein from the allergenic Source)	VITAL 3.0 ED01	2019 VSEP ED05 (mg protein)
Walnut (and Pecan*)	1.0	0.03	0.8
Cashew (and Pistachio*)	1.0	0.05	0.8
Almond (**)	1.0	0.1	
Peanut	2.0	0.2	2.1
Egg	2.0	0.2	2.3
Milk	2.0	0.2	2.4
Sesame	2.0	0.1	2.7
Hazelnut	3.0	0.1	3.5
Wheat	5.0	0.7	6.1
Fish	5.0	1.3	12.1
Shrimp	2.0	25	280

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

1. What methods to determine whether allergen cross-contact is reasonably likely to occur after cleaning, & the level of cross-contact?
2. Guidance for using PAL, based on the use of scientifically based threshold levels
3. How can thresholds be used by FBOs to determine:
 - the extent cleaning removes an allergen to minimise risk to allergic consumers;
 - whether an ingredient that contains a low-level allergen (e.g. an ingredient with a PAL) warrants control of its use to prevent cross-contact



Part 3: Recommendations



- 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



What's next? ED01 to ED05 transition

- Why? Allergen Bureau has always progressed with the latest science and recommendations from the VSEP
- Benefit? Alignment with FAO/WHO recommendations & Codex
- Companies will be ahead of potential Codex and local jurisdictional changes
- Next steps? Stakeholder engagement and strategy, education and communication planning for industry, consumers, clinicians, and enforcement agencies

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The next steps towards ED05

- Allergen Bureau led Industry research study on PAL impact
- International stakeholder engagement
 - Food Drink Europe
 - Food & Drink Federation (UK)
 - FSA
 - Other judications and industry stakeholder
- Stakeholder engagement with Coeliac patient advocacy groups
- Joint consensus statement on PAL to be developed

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The graphic is a white document with a blue header and footer. The header reads 'Food Allergen Management Consensus Statement'. The body contains several sections: 'IT IS THE RESPONSIBILITY OF CONSUMERS TO:' with two numbered points; 'WE CONSIDER THAT IN ORDER TO ENABLE CONSUMERS TO MAKE INFORMED DECISIONS ABOUT THEIR SAFETY:'; 'IT IS THE RESPONSIBILITY OF PACKAGED FOOD MANUFACTURERS TO:' with two numbered points; and 'IT IS THE RESPONSIBILITY OF FOOD SERVICE ESTABLISHMENTS/PROVIDERS TO:' with two numbered points. A paragraph follows stating that safety is a shared responsibility. The footer contains logos for Centre for Food & Allergy Research, national allergy strategy, Allergen Bureau Australia, ascia, Allergy NZ, and FAMS.

Food Allergen Management Consensus Statement

IT IS THE RESPONSIBILITY OF CONSUMERS TO:

1. declare their allergies and read food labels (including ingredient lists and allergen declaration statements), and
2. ultimately make their own judgement about the foods they choose to consume.

WE CONSIDER THAT IN ORDER TO ENABLE CONSUMERS TO MAKE INFORMED DECISIONS ABOUT THEIR SAFETY:

IT IS THE RESPONSIBILITY OF PACKAGED FOOD MANUFACTURERS TO:

1. follow robust allergen management practices including quantitative risk assessment, and
2. use clear, consistent labelling to inform consumers about that food's allergen content, including the possible presence of unintended allergens.

IT IS THE RESPONSIBILITY OF FOOD SERVICE ESTABLISHMENTS/PROVIDERS TO:

1. follow robust allergen management practices, and
2. ensure that staff understand and can inform consumers about the allergen content of the food they provide, including the possible presence of unintended allergens.

We recognise that the safety of consumers with food allergy is a shared responsibility of consumers, packaged food manufacturers, food service establishments/providers, health professionals, retailers, and regulatory and enforcement agencies.

This consensus statement is specific to consumers, packaged food manufacturers and food service establishments/providers, and is part of a strategy to improve the safety and quality of life of consumers with food allergy.

The image shows the interior of a modern bus, viewed from the back of the vehicle looking forward. The seats are red with yellow handrails. Blue vertical poles and horizontal bars are spaced throughout the cabin. The lighting is dim, and the overall atmosphere is clean and organized. The text "The rest of the world is catching up!" is overlaid in the center in white, bold font.

The rest of the world is catching up!

THANK YOU

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

CONTACT US:



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