

Allergen Bureau

Food Allergen Fundamentals & what defines Best Practise?

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Informing the
food industry



Agenda

- Who are the Allergen Bureau?
- Recalls
- Regulations (ANZ & International)
- PEAL (Plain English Allergen Labelling)
- Allergen Risk Review
- PAL (Precautionary Allergen Labelling)
- Best Practice for Valid labels
- 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



- ALDI Stores
- Baiada Poultry Pty Ltd
- 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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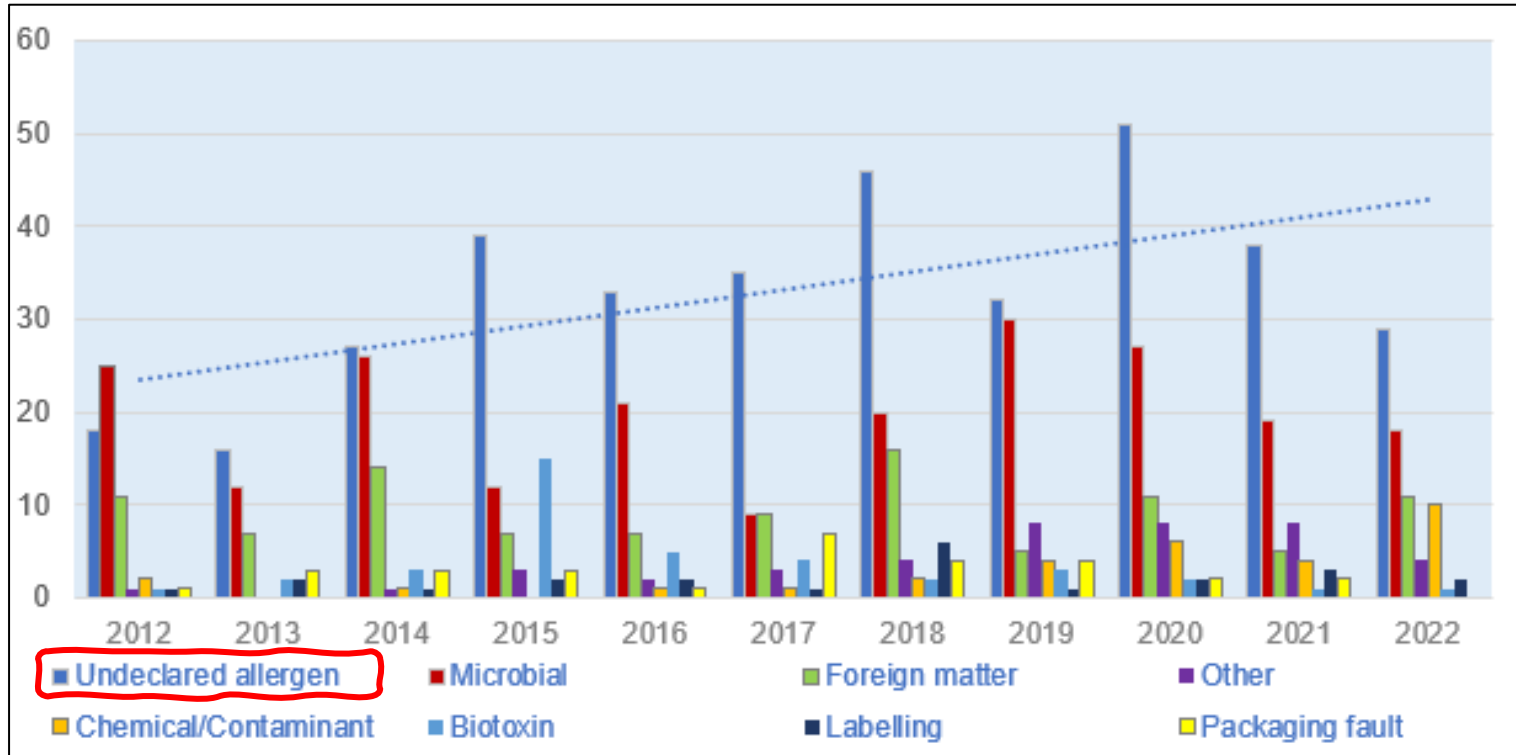


Recalls

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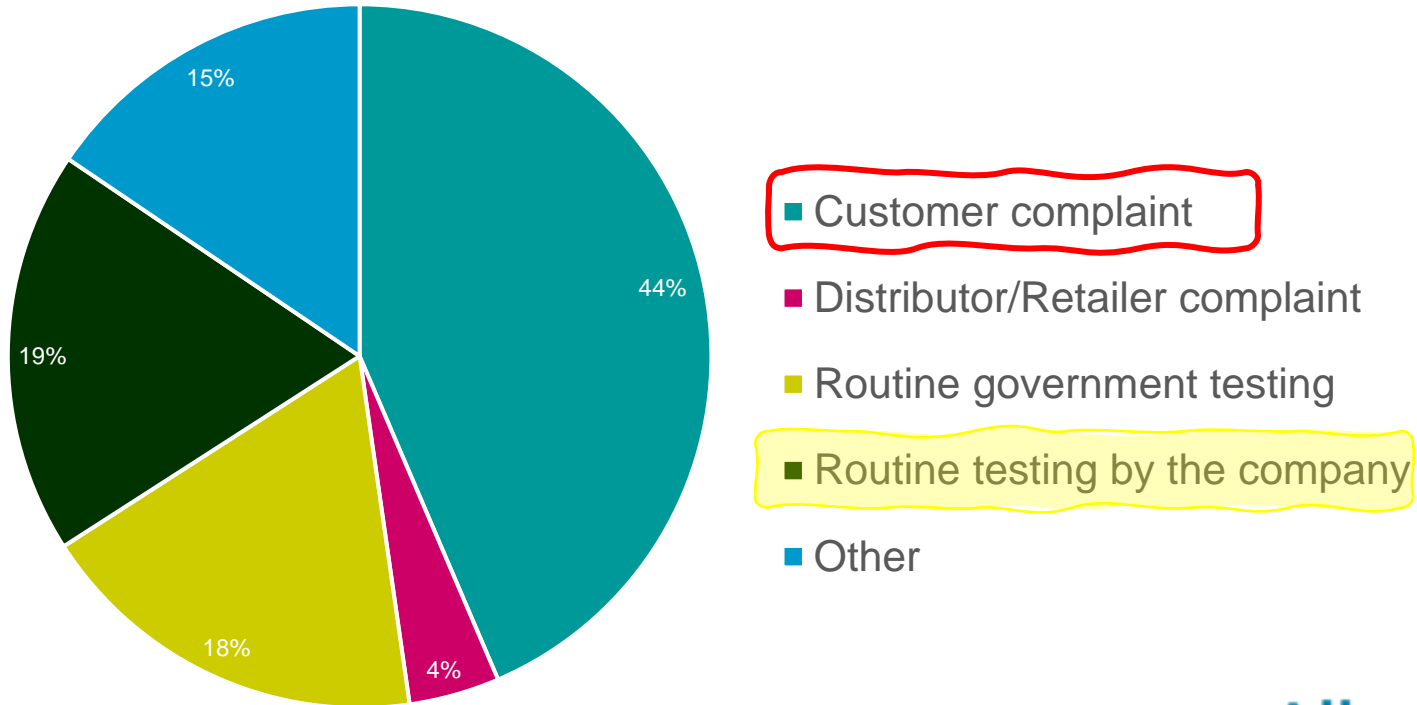
FSANZ Australia Food Recalls 2012-2022



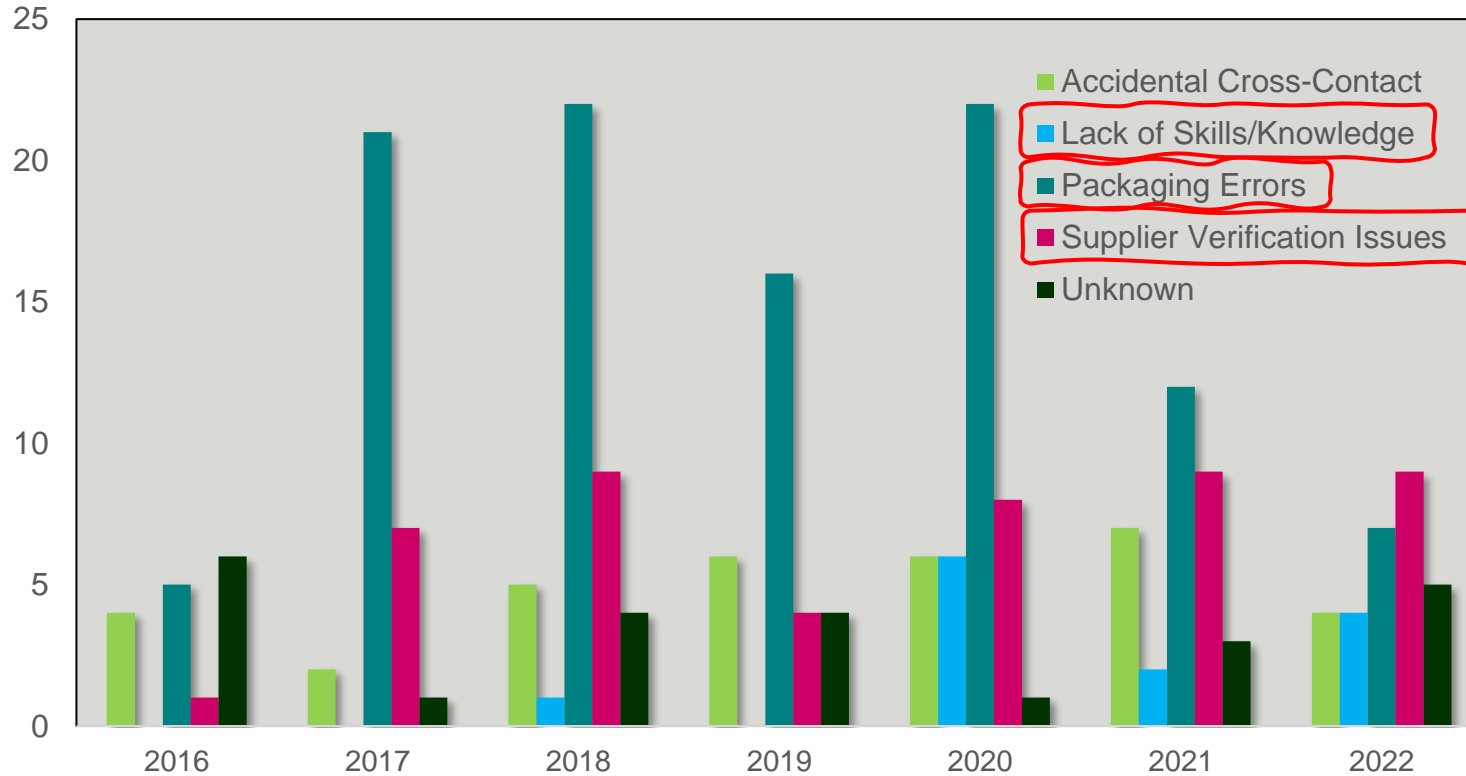
Thank you to FSANZ for this data: [Food recall statistics \(foodstandards.govt.nz\)](https://www.foodstandards.govt.nz/food-recall-statistics)

Problem Detection for Undeclared Allergen Recalls

2016–2022



Root Cause for Undeclared Allergen Food Recalls



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



Lactose
intolerance is due to
a sugar naturally
occurring in milk



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.

The FSANZ website provides more information.
www.foodstandards.gov.au

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International food allergen regulation

Imported foods offered for sale in ANZ must comply with the FSANZ 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)



Australia / NZ
(11+ 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 ≥10 mg/kg	x	Directly added or ≥10 mg/kg	x	x			

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

“Gluten Free” in 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 ANZ follow **Codex Alimentarius** established by FAO/WHO. (Food & Agriculture Organization and World Health Organization).

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

PEAL

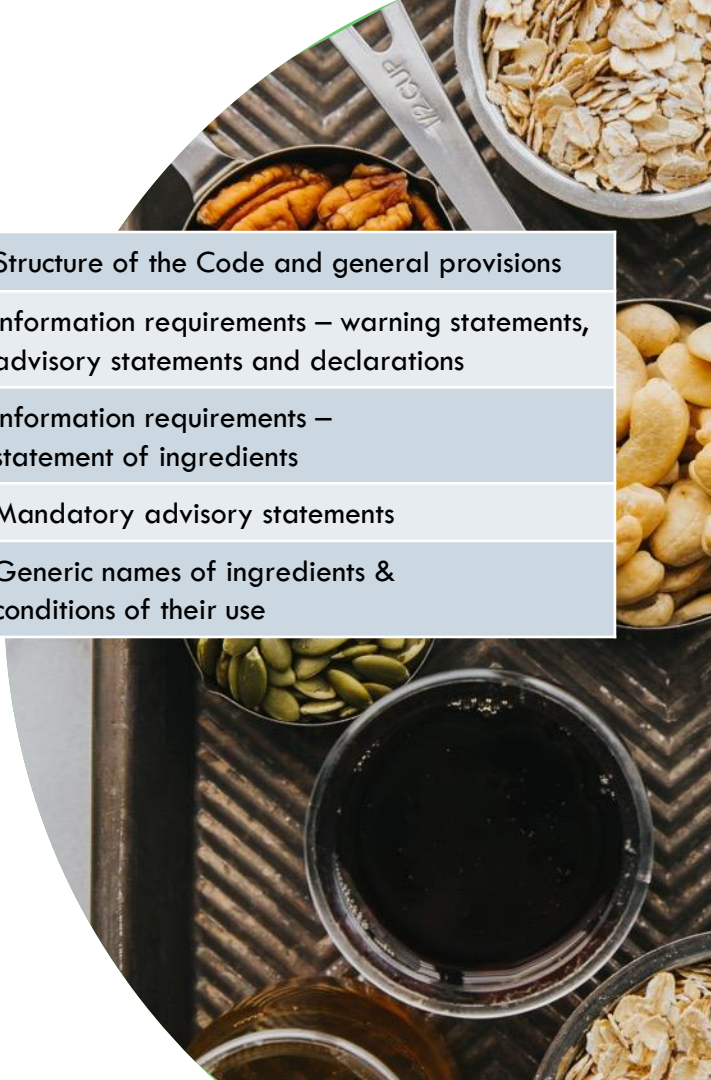
Plain English Allergen
Labelling

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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



Std 1.1.1	Structure of the Code and general provisions
Std 1.2.3	Information requirements – warning statements, advisory statements and declarations
Std 1.2.4	Information requirements – statement of ingredients
Schedule 9	Mandatory advisory statements
Schedule 10	Generic names of ingredients & 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***



Allergen Risk Review

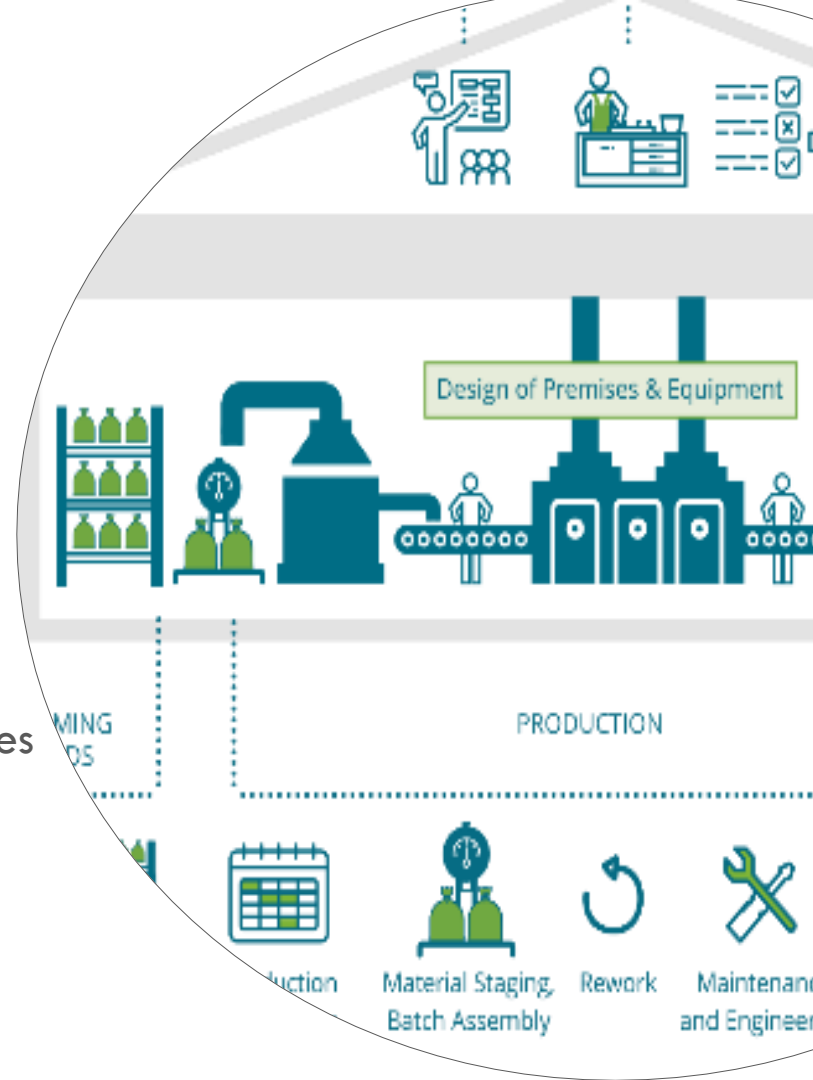
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Allergen Risk Review

- Process of thoroughly investigating the allergen status of food.
- Begins with raw materials and continues throughout the manufacturing process until food is packed and labelled.
- Information collected is used to inform both:
 - ✓ an allergen management program
 - ✓ a quantitative risk assessment
- Best practise is to implement an effective allergen management program with risk mitigation strategies to **eliminate, reduce and control** cross contact allergens to the lowest practicable level.

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Risk Assessment

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.

The VITAL® Program is an example of a science-based quantitative risk assessment for allergen cross contact.

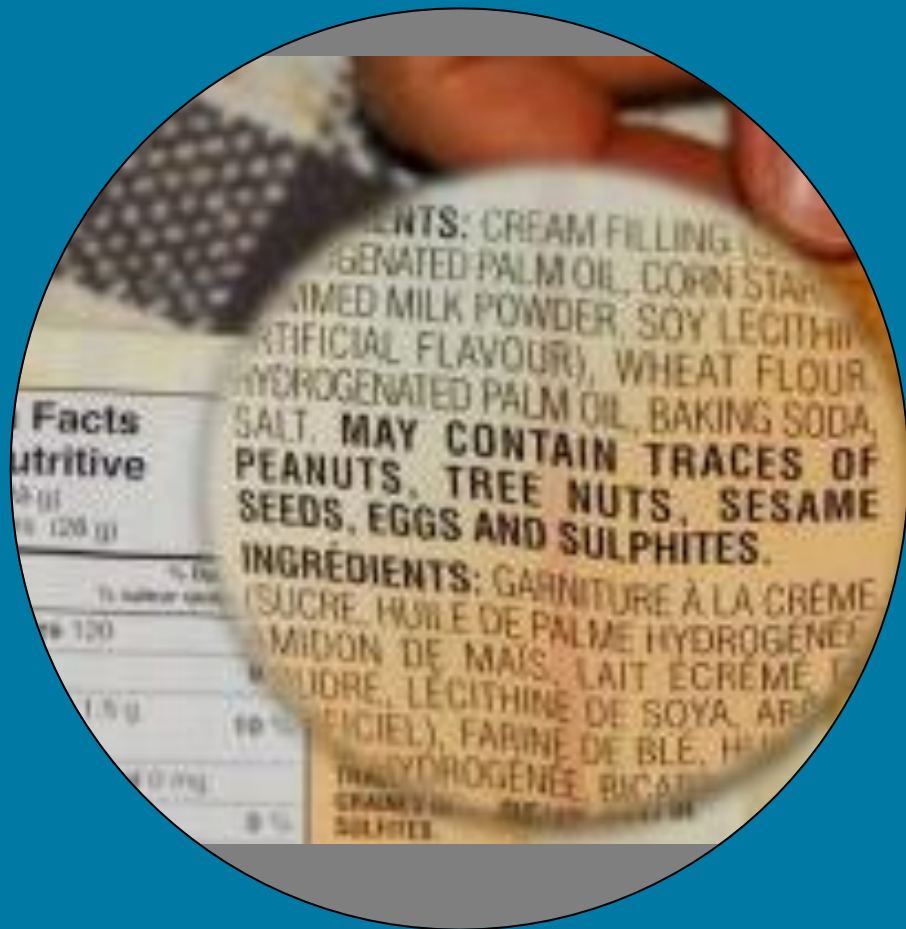
For the VITAL Online Calculator, VITAL Science, VITAL Training, the VITAL Standard, and more – visit VITAL Online.



PAL

Precautionary
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Precautionary Allergen Labelling (PAL)

PAL statements are:

- voluntary
- important for informing consumers of cross contact allergens
- most helpful when applied consistently across industry

May contain ...	May contain traces of ...	Packed in an environment where ... may be present	Made in a facility that also processes ...
Produced in a factory which handles ...	Produced on shared equipment that also processes ...	Made on the same production line as...	Made in a production area that also uses...
No nuts in ingredients, but cannot guarantee to be nut-free	Not suitable for ... allergy sufferers	Due to methods used in the manufacture of this product, it may occasionally contain ...	May be present: ...

Best Practice for Valid 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

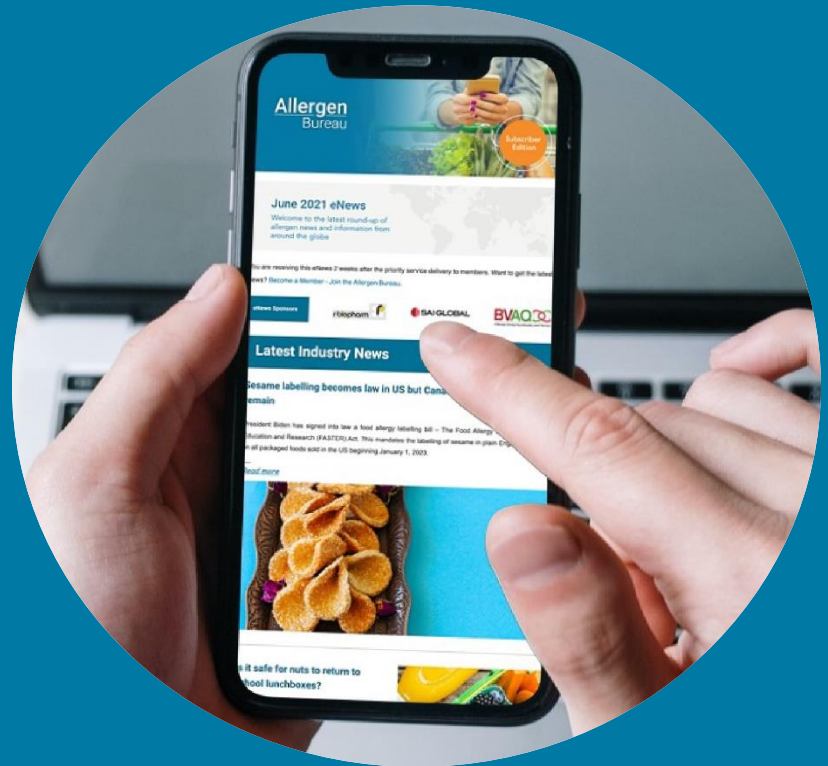


Right label on right product



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 Businesses



- **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 PEAL (Plain English Allergen Labelling).



Industry Guidance

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

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The Food Industry Guide to the
VOLUNTARY INCIDENTAL TRACE ALLERGEN LABELLING (VITAL®) PROGRAM

Version 3.0

April 2021

PEAL updated

Informing the food industry allergenbureau.net

The cover features a top-down view of various fresh ingredients including broccoli, avocado, spinach, and seeds, arranged in wooden bowls and baskets. A large blue circle on the left contains the title and version information.

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UNEXPECTED ALLERGENS IN FOOD

Revised & updated
January 2021

Informing the food industry allergenbureau.net

The cover displays a variety of food items such as lentils, chickpeas, pomegranate seeds, and vegetables, some in small bowls. A large blue circle on the left contains the title and update information.

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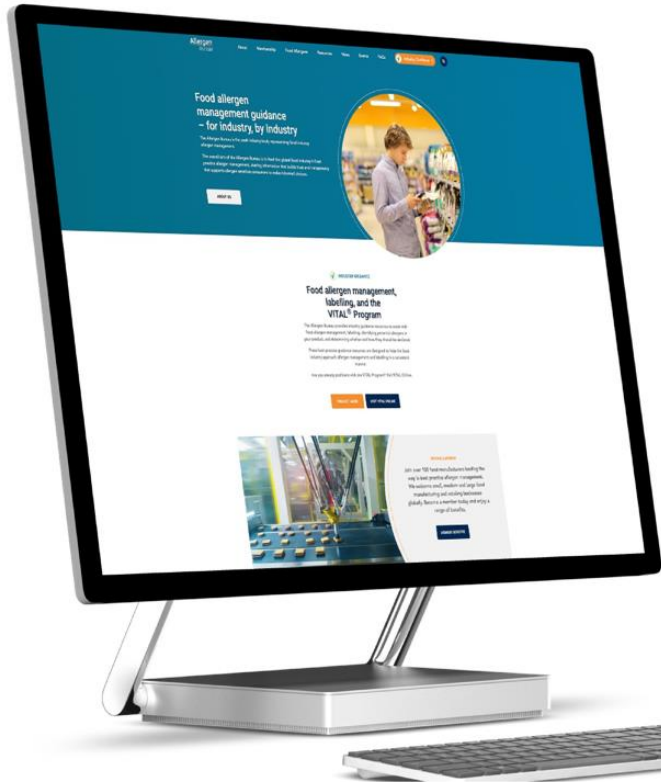
ASSESSING AGRICULTURAL CROSS CONTACT

AUGUST 2022

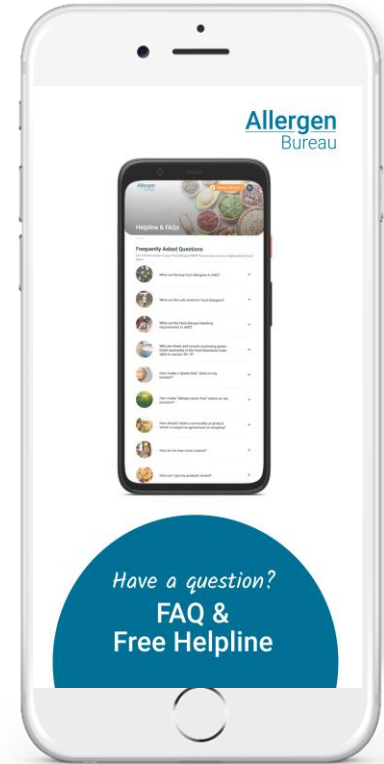
Informing the food industry allergenbureau.net

The cover shows a person in a plaid shirt and work pants standing in a field, with a tractor visible in the background. A large blue circle on the left contains the title and date.

Free resources available on our website



Please have a look at
allergenbureau.net
and VITAL[®] Online
vital.allergenbureau.net



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THANK YOU

CONTACT US:



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www.allergenbureau.net

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