

Allergen Bureau

Precautionary Allergen Labelling (PAL) and VITAL[®]

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Allergen Bureau – Director &
BVAQ – Food Safety Manager



Informing the
food industry

Our Membership

- 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

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Multi Region Member



Single Region L Members



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.

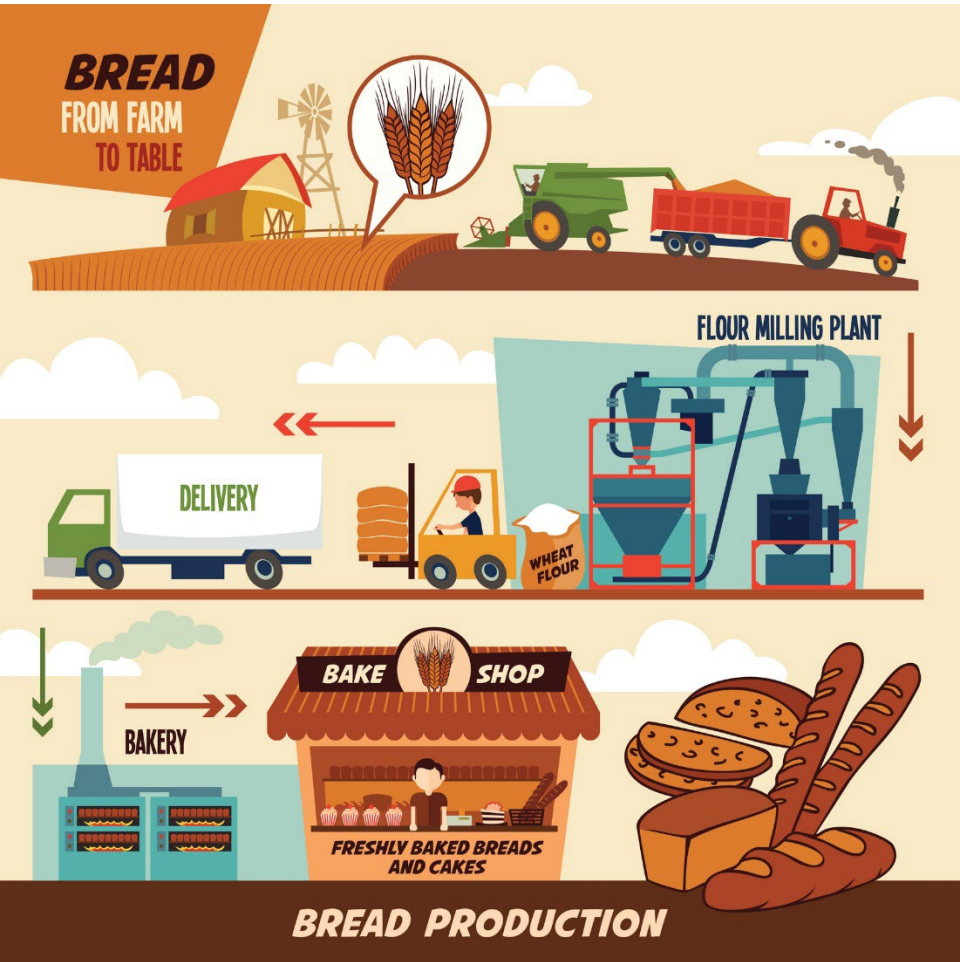
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Accurate & Consistent Allergen Information

- Allergen labelling is the key method to inform a consumer of the presence of allergens in food
- Helps those with food allergy choose foods which do not present a personal health risk
- The Allergen Bureau helps food companies by providing resources and tools to
 - Identify allergens in the food supply
 - Manage and control allergens in the facilities
 - Label mandatory allergens correctly
 - Determine if a PAL statement is needed





Allergens in the food supply

- Allergens are a naturally occurring part of the food supply
- Allergens are present all the time
- Food businesses are responsible for knowing when they are present and managing them
- From time-to-time allergens not intentionally added to products might also be present

What is the VITAL Program?

(Voluntary Incidental Trace Allergen Labelling)

The VITAL Program provides a consistent methodology for the 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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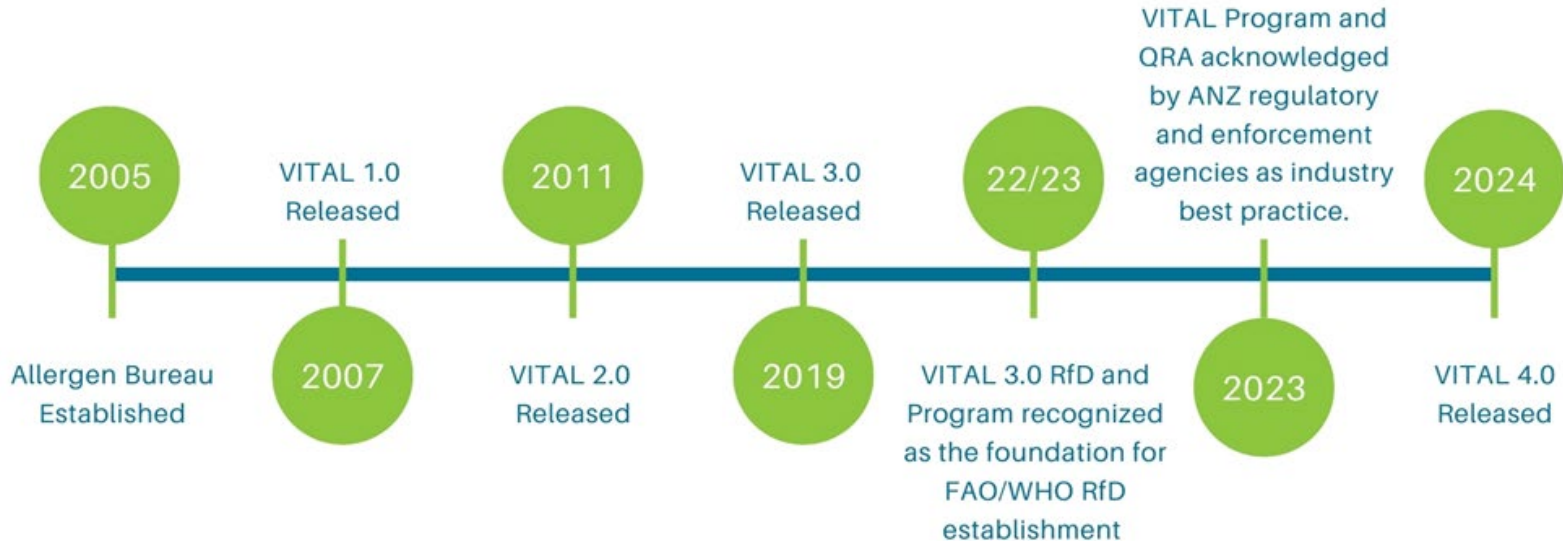
VITAL Program Overall Objective

To ensure manufactured food is **safe** to consume
for the vast majority of consumers with food allergy
by providing **consistent food labels** that declare the presence of
allergens, due to documented, unavoidable and sporadic cross contact thus
enabling consumers with food allergy and their carers to avoid purchasing
foods that may present a personal risk

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VITAL – 17 years of best practice and evidence-based science



Allergen Management and Risk Assessment



1. ALLERGEN RISK REVIEW

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



2. ALLERGEN MANAGEMENT

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



3. ALLERGEN RISK ASSESSMENT

Informs VITAL ethos, Allergen Management practices, risk communication to consumers

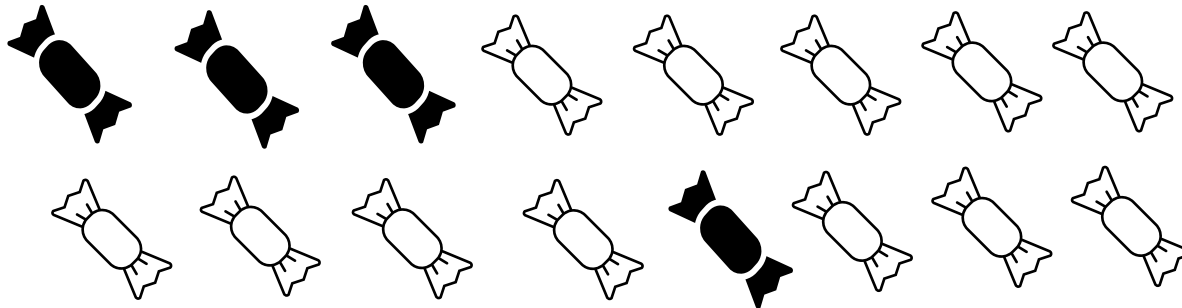
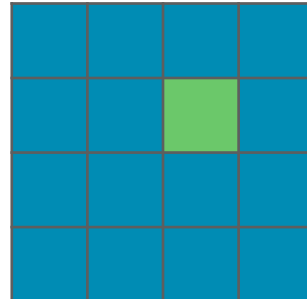
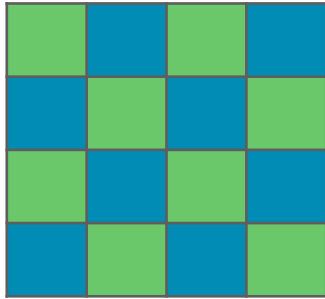


4. ALLERGEN COMMUNICATION

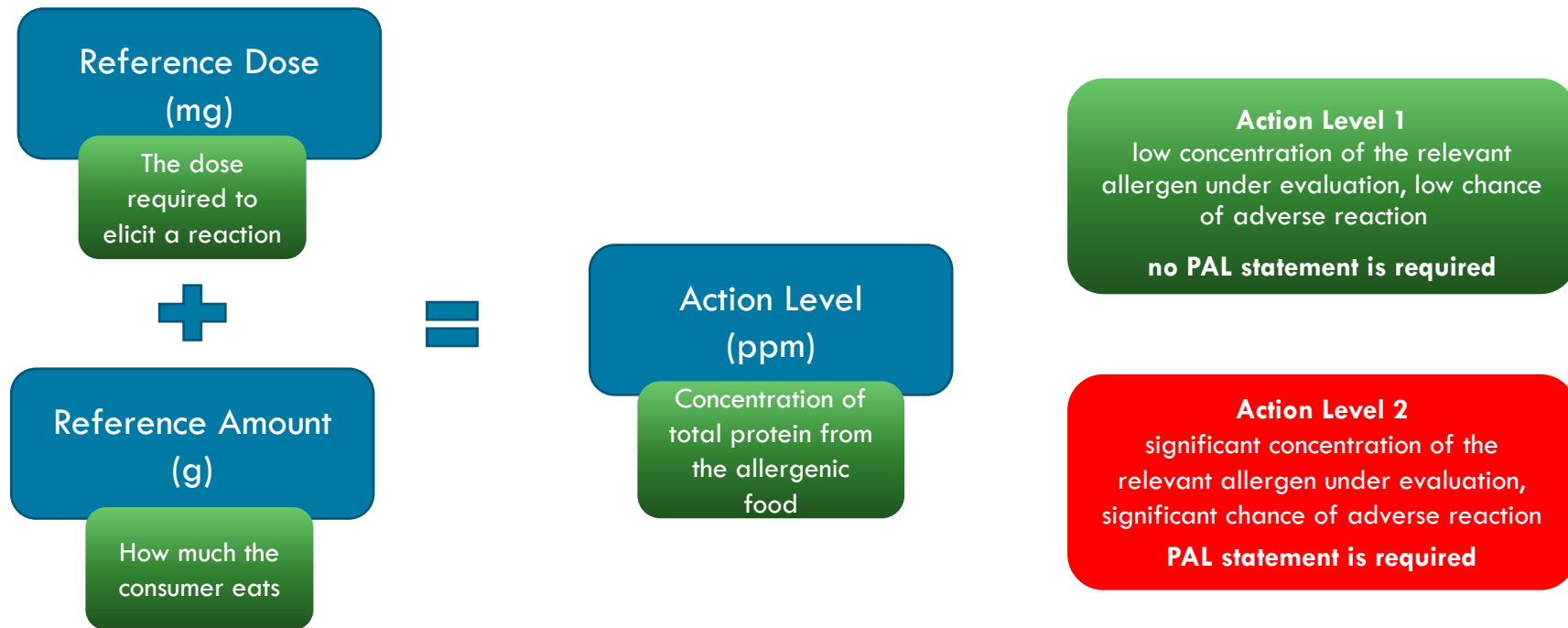
Forming an ingredient list & use of PAL

Cross contact allergens

Can be either readily dispersible (mix homogeneously) or particulate in nature (do not mix homogeneously and contain the Reference Dose)



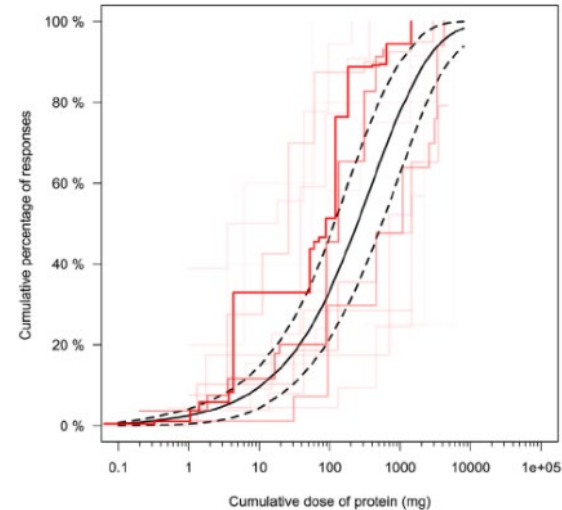
Concept of a VITAL Risk Assessment



VITAL Underpinned by Robust Scientific Data



- FAO/WHO Ad hoc Expert panel endorsed VSEP RfD Methodology
- “Stacked Model Averaging” which incorporated 5 different statistical models to produce a single “averaged” distribution
- Selected an **ED₀₅** Reference dose
- Increased data set for sesame and cow's milk
- Severity data used to support FAO/WHO work
- **ED₀₅** values simplified by rounding down



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ED₀₅ based values

- The VSEP recommended **ED₀₅** based values in 2019, stakeholders were not ready for the move
- **ED₀₅** based values have now been confirmed by the FAO /WHO panel & legislated in some markets
- We are likely to see **ED₀₅** in Codex soon/potentially
- VITAL 4.0 a QRA harmonised global approach
- **ED₀₅** may positively impact food choices for individuals with food allergies



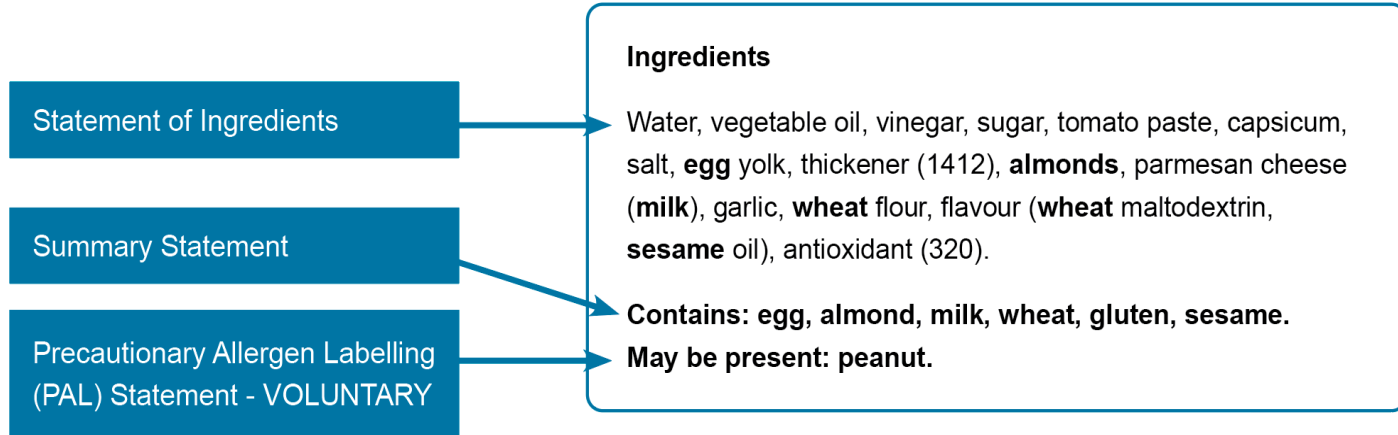
The New ED₀₅ Reference Doses

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Allergen	VITAL 3.0 Ref Dose (mg protein)*	VITAL 4.0 Ref Dose (mg protein)#	Change
Priority Allergens (RfD)			
Almond	0.1	1.0	↑
Cashew (and Pistachio)	0.05	1.0	↑
Egg	0.2	2.0	↑
Fish	1.3	5.0	↑
Hazelnut	0.1	3.0	↑
Milk	0.2	2.0	↑
Peanut	0.2	2.0	↑
Sesame	0.1	2.0	↑
Shrimp	25	200	↑
Walnut (and Pecan)	0.03	1.0	↑
Wheat	0.7	5.0	↑
Non-Priority Allergens (RfD)			
Soy	0.5	10	↑
Celery	0.05	1.0	↑
Non-Priority Allergens (Risk Management Value)			
Lupin	2.6	10	↑
Mustard	0.05	1.0	↑
Brazil nuts, Macadamia nuts, Pine nuts	0.1	1.0	↑
Buckwheat	-	10	+
VSEP Risk Management Value			
Mollusc	-	20	+
European Legislated Values (Netherlands)¹⁰			
Lupine (Netherlands Legislated Allergens-NVWA 2024)	2.6	15	↑
Mosterd (Netherlands Legislated Allergens-NVWA 2024)	0.05	0.4	↑

*Based on ED₀₁. #Rounded from ED₀₅ + New Reference Dose or Risk Management Value

Recommended Labelling Format When VITAL has Been Applied

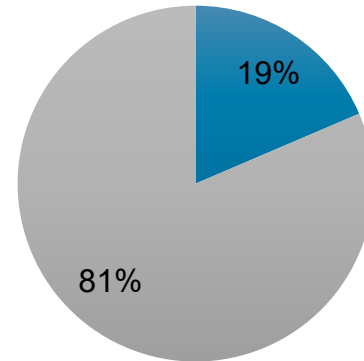


“May be present: allergen x, allergen y.” is recommend in conjunction with the VITAL Program

Does ED₀₅ make more food choices available?

- Approximately **19% of products** currently labelled with a PAL may no longer need one
- With tens of thousands of products on supermarket shelves, in time, the ED update could make available hundreds, if not thousands, of additional products to allergic consumers.

Impact of ED05 on labelling outcome



■ PAL Reduction ■ No PAL Reduction

Allergen Bureau Guidance to Industry on PAL

- Implement an allergen management program
 - Assist businesses to identify and manage allergens in the food supply and in their facilities
- Adopt the VITAL program philosophy
 - Eliminate, reduce, manage allergen risks
 - Communicate the risk through accurate labelling
- Only use PAL when indicated by a VITAL risk assessment





Key Messages for Consumers with Food Allergy

- VITAL RA underpinned by **ED₀₅** based **RfD** may result in **fewer PAL statements**
- **PAL statements** derived by **VITAL** remain **meaningful** and consumers should have strong regard to these statements
- Where a VITAL outcome indicates **that no PAL is required**, consumers with food allergy should be confident in consuming the product

FOOD & GROCERY Allergen Bureau

4.1 ALLERGEN LABELLING 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

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

NEW VITAL Online Website

Food allergen management, labelling, and the VITAL Program

NEW Corporate 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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THANK YOU

CONTACT US:



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