

Allergen Bureau

What is happening in Allergen Management

Nicole Koek

GS1 Recall Forum – September 2024

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, and the lighting is bright.

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



Agenda

- Update on VITAL 4.0
- Industry PAL Survey
- Consensus Statement
- The VITAL Program and due diligence
- Other focus areas

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VITAL[®] 4.0

- **Based on FAO/WHO Expert Panel ED₀₅ Reference Doses**
- Includes Legislated European Values (The Netherlands)
- Additional - Canadian Jurisdiction
- ED₀₁ Action Level Grid (VITAL 3.0)
- Additional - Risk Value for Mollusc
- Default setting for jurisdiction
- Pop up reminder for particulates
- Updated T&C's



Allergen Risk Assessment underpinned by globally recognised, evidence based, scientific data

ED05 Transition Messaging

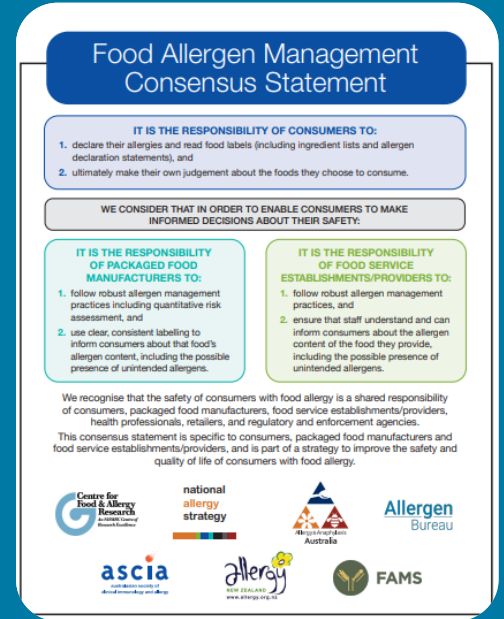
1. VITAL Philosophy remains unchanged: IDENTIFY, ELIMINATE, REDUCE, MANAGE, COMMUNICATE
2. Risk profile for businesses or products is unlikely to change
3. Businesses may experience an increase in consumer calls. Due diligence is key.
4. PAL statements must be meaningful
5. VITAL risk-based assessments have never been underpinned by a 'no risk' philosophy



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Joint Consensus Statement

- Update to include PAL, release expected Q3
- Education & Collaboration must be the focus
 - Healthcare professions (dietitians, allergy nurses, clinicians)
 - Legislators and enforcement agencies
 - Consumers and carers
- Aligned key stakeholder messaging
- Allergen Collaboration continues to work to solve the problems of SME



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.

Centre for Food & Allergy Research
Allergen Bureau
Research Institute

national allergy strategy

Allergen Bureau
Australia

ascia
Allergen Society of Australia
www.ascia.org.au

Allergy
NEW ZEALAND
www.allergy.org.nz

FAMS

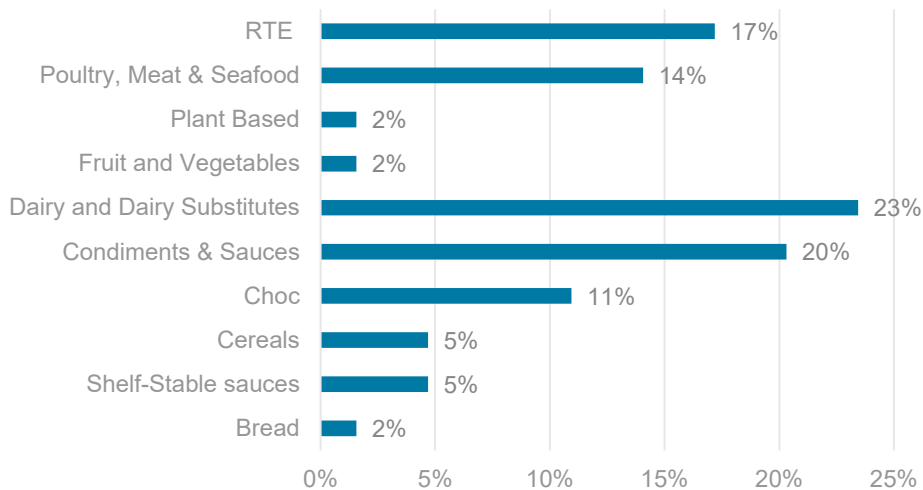
Why do the PAL survey?

- Managing consumer expectation during the transition
- An assumption that PAL will reduce, but currently this is not based on data
 - There is no data available directly from industry on what drives current PAL
- Show case that industry commitment

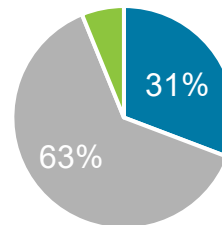


What have we seen?

Categories of the supermarket represented

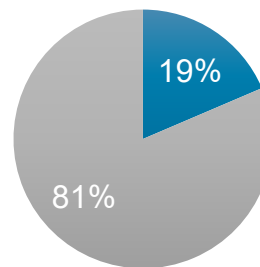


Survey Results - Drivers of PAL



■ Homogeneous x contact ■ Particulate x contact
■ Unusable

Impact of ED05 on labelling outcome



■ PAL Reduction ■ No PAL Reduction



Let's Talk
Legal Defense

How VITAL is Supporting Enforcement Decisions & Protecting Businesses

- Australian & NZ acknowledge a statutory due diligence in respect to breaches in the Food Standard Code
- The application of VITAL has been used to demonstrate due diligence to an enforcement agency

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Due Diligence – The Legal Terms

Defence of due diligence

- (1) the person **took all reasonable precautions and exercised all due diligence**
- (2) Without limiting a person satisfies those requirements if ..—
 - (a) ... the commission of the offence was due to—
 - (i) an act or default of another person, or
 - (ii) reliance on information supplied by another person, and
 - (b) that—
 - (i) .. carried out all such checks ... reasonable in all the circumstances, or
 - (ii) it was reasonable to rely on checks ..

Australia – all jurisdictions

Food Safety Program

- ... a person may satisfy those requirements by proving that—
- (a) the person complied with a food safety program for the food business; or
 - (b) in any other case, the person complied with a scheme (for example, a quality assurance program or an industry code of practice) that was—
 - (i) **designed to manage food safety hazards** and was based on Australian national or international standards, codes or guidelines designed for that purpose; and
 - (ii) documented in some manner.

VITAL & Due Diligence Defence

Food Authority



VITAL® – PAL due diligence

- VITAL® is a recognised system for assessing incidental allergen contamination risk.
- industry code of practice) that is **designed to manage food safety hazards** – allergens, and is a guideline designed for that purpose

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Source: Presentation by A.Edwards Food Law Conference: Navigating Regulation and Risk. Title: Rethinking HACCP, Why Label Approval and Application Should be a Critical Control Point in Food and Beverage Production (01.12.2023)

Case Study – No PAL

- A single consumer reports a reaction to a product.
- Allergy to cow's milk
- The product does not contain milk, nor carries a PAL
- Dairy detected in the product at 0.19ppm
- Enforcement agency reviews the companies' procedures
- VITAL risk assessment had been conducted, outcome = no PAL required
- Levels detected were below which would have required a PAL and supported the VITAL outcome
- No action was taken against the company
- “took all reasonable precautions and exercised all due diligence to prevent the commission of the offence” (s26(1) *Food Act 2003 (NSW)*)

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Source: Presentation by A.Edwards Food Law Conference: Navigating Regulation and Risk. Title: Rethinking HACCP, Why Label Approval and Application Should be a Critical Control Point in Food and Beverage Production (01.12.2023)

Have you used VITAL?

The Allergen Bureau's VITAL (Voluntary Incidental Trace Allergen Labelling) Program is a standardised allergen risk assessment process for food industry.



vital.allergenbureau.net

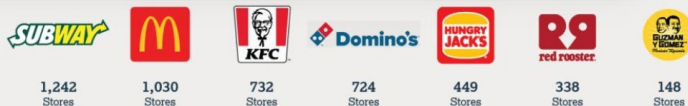


Current Allergen Bureau projects Australia/NZ

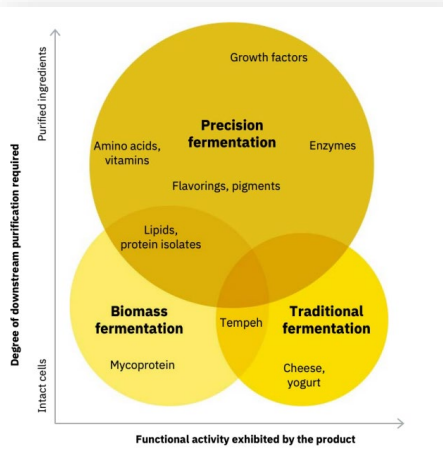
BY ALLERGEN BUREAU - SEPTEMBER 26, 2023

Would You Like To Participate In A New QSR Working Group?

Australia's Market Leaders by Store Network



6th Food Allergen Management Symposium (FAMS)
Sydney 20-22 May 2025



EVENT - SEP 3, 2024 - SEP 6, 2024

34TH ANNUAL CONFERENCE OF THE AUSTRALASIAN SOCIETY OF CLINICAL IMMUNOLOGY AND...

Adelaide The 34th ASCIA Annual Conference will be held at the Adelaide Convention Centre from Tuesday 3rd to Friday 6th September 2024. The program will include: All sessions will be recorded to enable on demand CPD opportunities.



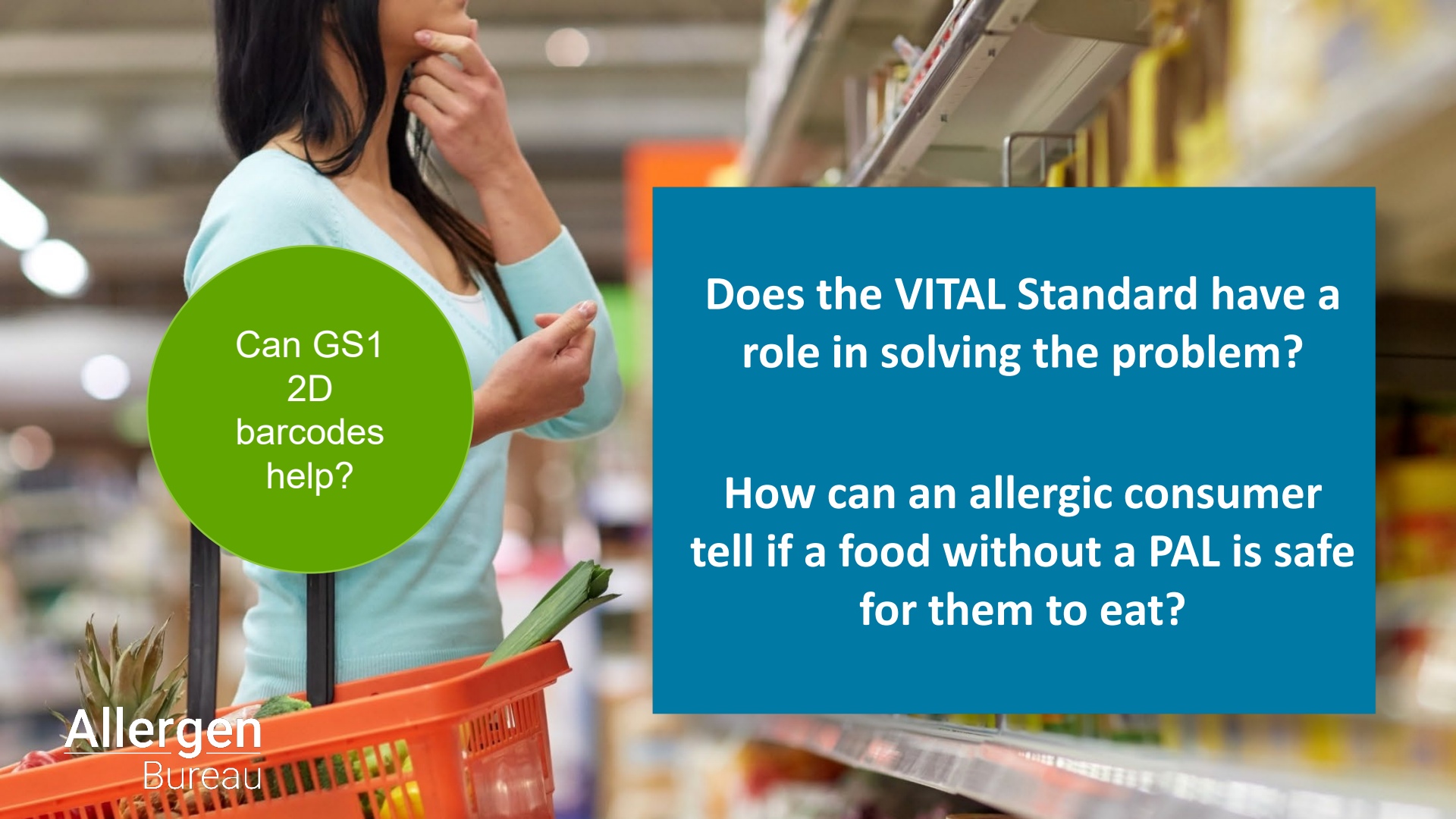
Update on Food Allergen Labelling

Wed 17th April | 8:00pm AEST | Online Webinar

The VITAL Standard

- Released 2019
- Voluntary
- Designed to assist with Consumer Confidence.
 - Has a product without a PAL been risk assessed?
 - Has this PAL been added based on risk?
- Hurdles
 - Lack of industry uptake
 - Audit fatigue
 - Currently no market pull





Can GS1
2D
barcodes
help?

**Does the VITAL Standard have a
role in solving the problem?**

**How can an allergic consumer
tell if a food without a PAL is safe
for them to eat?**

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THANK YOU

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