

# Allergen Bureau

## Best Practice Management of Allergens

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# Allergen Bureau

- Established in 2005, pre-competitive, 'not-for-profit', Allergen Bureau directors provide voluntary, unpaid services
- Membership based organisation established to provide food industry with rapid responses to questions about allergen risk management in food ingredients and manufactured foods

Become a member



# Allergen Bureau

## 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.



# Agenda

- What is a Food Allergy
- Why does it matter to your business
- Three core concepts
- How to complete a risk review
- Embedding the process



# Food Allergy

A food allergy is an overreaction by the body's immune system to a certain food.

The body produces antibodies against a food protein and releases histamine and other chemicals causing inflammation.

An allergic reaction often occurs within minutes, though can take place up to two hours after ingestion.

A circular inset image on the right side of the slide shows a hand reaching towards a plate of toast. The toast is stacked on a white plate, and the background is blurred, suggesting a kitchen or dining area.

Small amounts of an allergen can trigger a reaction and avoidance of the allergen is the only way to manage the condition.



# Signs of a Food Allergic Reaction

Food allergy symptoms vary in nature and severity between individuals. Signs of a mild to moderate allergic reaction can include:

- swelling of the lips, face, eyes
- hives or welts
- tingling mouth
- abdominal pain
- vomiting



In Australia & New Zealand, food allergy occurs in approx. 10% of infants, 4-8% of children, and 2% of adults\*

# Anaphylaxis

Anaphylaxis is a severe allergic reaction involving swelling of the airways and can be fatal if not treated with adrenaline within minutes.

In rare cases multiple organ systems are affected and death can occur in as little as ten minutes.

The incidence of anaphylactic reactions to food in allergic individuals is increasing.



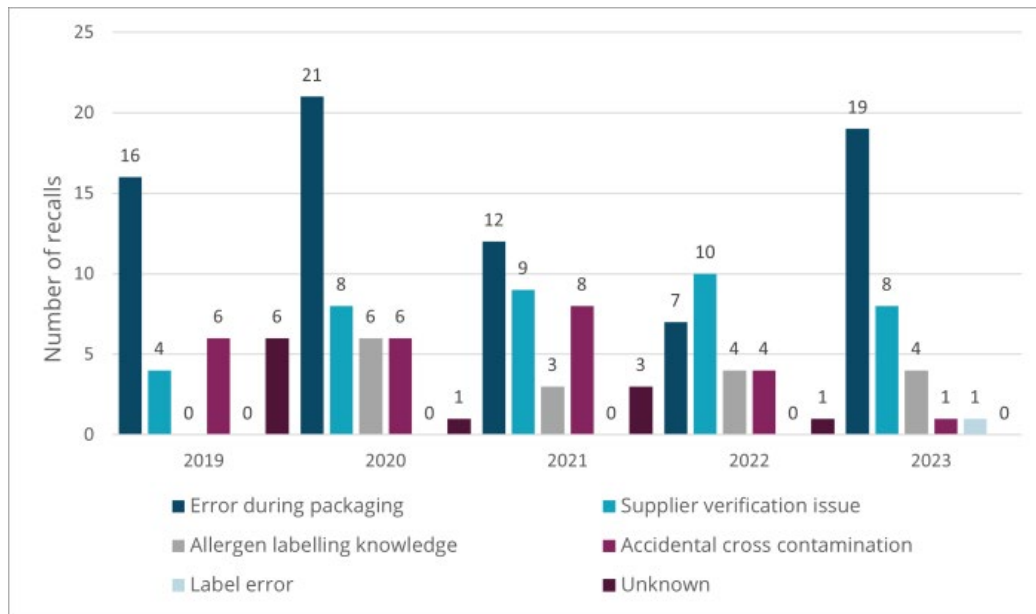


# Accurate & Consistent Allergen Declaration

- Allergen labelling is the key mechanism to inform a consumer of the allergen status of a product
- Appropriate allergen declaration can:
  - help food allergic 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



# Food Recalls on the rise.



- Undeclared allergen in food remain a key driver of recalls, accounting for 47% of recalls last year.
- Milk is the leading undeclared allergen
- Errors during packaging most common root cause
- Incorrect information (supplier verification) is another key driver

Is packaging changeover in your HACCP plan?

# Definitions for ANZ market

- **PEAL = Plain English Allergen Labelling**
  - For Intentional Allergen Presence
  - Covered by the Food Standards Code
  
- **PAL = Precautionary Allergen Label**
  - For Unintentional Allergen Presence  
e.g. May be present or May contain.
  - Voluntary



# Foods and Ingredients to be Declared



Egg



Lupin



Barley



Milk



Wheat



Rye



Sesame



Fish



Oats



Peanut



Crustacean



Sulphites



Soy, soya,  
soyabean



Mollusc

## Tree nuts



Almond



Pecan



Brazil nut



Pistachio



Cashew



Walnut



Hazelnut



Pine nut



Macadamia

# To avoid recalls and prevent illness

- Regular Allergen Risk Reviews must be completed.
- The effectiveness of pre-request programs, HACCP controls, and cleaning capability must be assessed.
- Good allergen controls embedded in your facility (Allergen Management Procedures)
- Invest in considerable due diligence before making any “Free From Claims”.





*Let's talk*  
**Allergen Free Claims**

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## Allergen Free Claims

- Criteria for allergen free claims such as 'dairy free' or 'peanut free' are not in regulation
- Free claims - Captured by Consumer Competition regulations
- In AUS/NZ 'allergen free' claims infer zero
- Allergen free claims can be made but – require evidence/due diligence & higher level of validation to substantiate

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# All 3 Create a Feedback Loop



## 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

# Allergen Risk Review

*The process of thoroughly investigating the allergen status of food.*

This begins with raw materials and continues throughout the manufacturing process until the food is packed and labelled.

*The information collected in an allergen risk review can be used to:*

- *Inform an allergen management program*
- *Inform a risk assessment*
- **Give confidence in the label accuracy**



# 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 hazards
- Include the “life-cycle” of the product from raw materials, every step of production, and labelling & packing
- *The risk review can help you determine where to focus from a policy and procedures point of view.*
- Establish systems to prevent unintentional cross contact for allergens to other products



# Risk Assessment

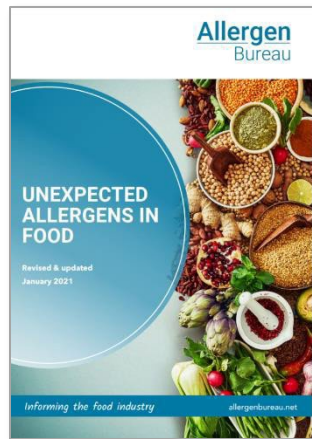
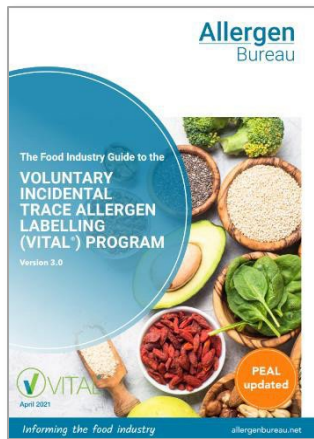
The scientific evaluation of known or potential adverse health effects resulting from human exposure to foodborne hazards (Codex).

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<sup>®</sup> risk assessment using the VITAL Program principles is an example of a science-based risk assessment for allergen cross contact.



# Resources Available



## VITAL Standard

The VITAL Standard is a supplementary certification program for food manufacturers that are already certified to GFSI recognised food safety management standards that include allergen management. The VITAL Standard is certified by Certification Bodies accredited to ISO/IEC 17065:2012 (or subsequent version) and audited by auditors trained in the VITAL Standard and registered with The Allergen Bureau Ltd.

Manufacturers that achieve VITAL certification may use the VITAL Mark on the products within their scope of certification.

The VITAL Standard was produced by the VITAL Phase 3 – Certification Working Group.



<https://allergenbureau.net>



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# Allergen Risk Review

- **Can I confidently and accurately label my products?**
- What gives steps give you confidence to answer this question with a YES?
- The questions you ask as a part of an allergen risk review give you confidence.

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### Raw Material Information:

1. What markets will these raw materials be sold into?
2. What are the priority allergens that must be declared for that market?
3. Has my supplier given me information on all of these allergens?
4. Can they confirm allergens not mentioned in the specification are absent in the formulation as an ingredient, additive, processing aid or cross contact risk
5. Do I have a vendor assurance program that gives me confidence in my supplier's information? Have we been to the manufacturing site?
6. Can my supplier identify cross-contact allergen risks for all priority allergens?
7. Can my supplier quantify those risks? How are they doing this? What evidence have they shown me?
8. Is the supplier confident in answering my questions?
9. Does my supplier have test results to verify the information they have given me?\*
10. Could any unintentional allergens be hiding?

# Allergen Risk Review

- **Are my allergen management procedures sufficient to mitigate risks?**
- Do they prevent cross-contact allergens from entering my product?
- Do I need to use a PAL?
- A VITAL<sup>®</sup> risk assessment can assist you to determine the answer

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# Allergen Risk Review Simplified –The Factory

## My facility:

1. What allergens are in the facility that are not in my product?
2. Does the way they are received, stored or transferred represent a risk?
3. Is my product mixed, batched or go through staging at a similar time to other allergens?
  4. How am I controlling my rework?
5. Do the controls I have in place to mitigate that risk make it impossible for cross contact to occur, unlikely, possible or actually there is really a risk.
  6. What can I do to lower the risk?



# Allergen Risk Review Simplified –The Line

1. What allergens are on my line that are not in my product?
2. Where in the production schedule does my product run relative to others?
3. Is the cleaning regime sufficient to remove all allergen or could there be some residual left over?  
(Look at Cleaning Validation Data).
4. Can cleaners visually inspect all kit after cleaning
5. Does my line have any hang-up points?
6. How much material gets stuck?

# Allergen Risk Review – Embedding the process



Allergen Risk Review should be cross-functional.

Senior Management should be involved as well as factory floor workers, cleaners, engineers and QA staff.

Is a great example of a program that supports continuous improvement of food safety culture.

If you see something on the floor that could create an allergen risk –  
SPEAK up....

3. Food Safety Culture Plan					
3.1 General requirements	3.1.1	P	R		The Supplier's senior management must define and document a clear and structured approach for the development and continuous improvement of a food safety and quality culture taking into consideration the outcomes of the food safety and quality culture review.
					The food safety and quality culture plan must include a description of: <ul style="list-style-type: none"><li>● Activity to be undertaken</li><li>● Target organisational level as described within clause 2.1.2</li><li>● Timescale for completion</li></ul>
3.2 Review and Continual Improvement	3.2.1		R		The status and effectiveness of the plan and activities should be reviewed and tracked as part of the Supplier's Management Review process and ensuring continued senior management commitment.
	3.2.2		R		Review of the Food Safety and Quality Culture plan and corresponding structured approach should be completed at least annually or more frequently if required.

## In summary:

- A strong food safety culture will give you the confidence to identify and manage allergen hazards as they arise.
- A systematic consistent approach to Allergen Risk Review will give you confidence in your Allergen Management Controls.
- The VITAL<sup>®</sup> program can be used to determine if the residual risk warrants communication via a PAL.
- You can not set and forget. Regular reviews are needed
- The Allergen Bureau has lots of resources and a free helpline to assist you.

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**THANK YOU**

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