

Annual report

*July 2023 – June 2024*

**Contact details for this report:**

Manager  
Allergen Bureau  
Phone: 0437 918 959  
Email: [info@allergenbureau.net](mailto:info@allergenbureau.net)

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## ***Our Vision***

**A trusted food supply for allergen sensitive consumers around the world.**

## ***Our 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.**

## ***Introduction***

We extend our gratitude to our dedicated volunteer Board and loyal members. This year, the Allergen Bureau focused on transforming insights from the 2022 member and stakeholder discussions into a comprehensive 5-year strategic plan.

We consulted the VITAL® Scientific Expert Panel (VSEP) and clinical colleagues to develop the VITAL 4.0 summary and FAQ document, supporting the transition to ED05 based Reference Doses for quantitative risk assessment. Our efforts to support industry locally and internationally in understanding allergen risk resulted in over 800 new reports generated in VITAL Online over the past year.

Following the introduction of multifactor authentication to VITAL Online, further changes have enhanced the user experience along with updates to the subscription model in VITAL 4.0 to address data ownership matters. We remain committed to ensuring users are well-trained in the principles of the VITAL Program to support their ability to conduct robust Quantitative Risk Assessments.

The Allergen Bureau continue to work with industry, consumer groups, clinicians, and regulators in Australia and New Zealand to refine the Allergen Consensus statement, which will clarify stakeholder responsibilities, particularly around PAL statements.

Our focus on broad collaboration allows us to work with others to tackle industry-wide challenges and ensure consistent information for consumers. For example, the QSR Working Group, led by McDonald's, exemplifies our commitment to defining best practices for allergen management and communication across QSRs.

We sincerely appreciate our Members' ongoing support, recognising that membership funding helps us strengthen and manage risks within the supply chain and assist businesses striving to meet the needs of those vulnerable to food allergies.

## ***Our Strategic Pillars – 2021-2025***

- 1. Evidence-based science**
- 2. Best practice allergen management guidance and resources**
- 3. Key stakeholder acknowledgment**
- 4. Global influence and brand recognition**
- 5. Good governance and financial sustainability**

## Allergen Bureau Membership

Maintaining financial security through a strong membership base remains a key priority for the Allergen Bureau’s volunteer Board. Under the new constitution, all businesses that join the Allergen Bureau are now recognised as full members with voting rights and Board eligibility. We also introduced, effective from the 2024-25 membership year, a new Regional Category for companies operating in several international regions (but not globally), and an Associate (Supporter) membership for individuals not affiliated with an organisation.

We are grateful to all our members for their continued support, contributions, and encouragement. Your involvement inspires and drives the development and innovation of our resources and tools, helping us achieve our vision of a trusted food supply for consumers with food allergies worldwide.

Membership numbers increased modestly by 7% this year, with 11 new organisations joining us by the end of the membership year.

Table 1. Allergen Bureau membership, last three Membership\* Years.

Membership Year (1 April to 31 March)				
Membership	FTE Employees	2021-22	2022-2023	2023-2024
Full – Global	>100	1	1	1
Full	>100	42	45	46
Associate C	51-100	11	10	10
Associate B	10-50	18	21	22
Associate A	<10	20	22	26
Associate D	Individual	46	49	54
<b>TOTAL</b>		<b>138</b>	<b>148</b>	<b>159</b>

\* noting that our Membership year does not align with the financial year

### New Members

During the 2023-24 membership year we welcomed the following food businesses committed to creating trusted brands for allergen-sensitive consumers:

Full Member:

- Zensho Holdings – Japan’s largest food service company.

Associate Members:

- Axel Groupe
- Biscuit International
- KB Seafood Co
- Nonna’s Bakehouse
- Westland Milk
- ELISA Systems
- Michail Arabatzis

The most current list of Full Member organisations, committed to best practice allergen management practices and tools, can be found on the [website](#).

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## 1. Evidence based science

### VITAL Scientific Expert Panel

The VITAL Scientific Expert Panel (VSEP) consists of international scientists and experts specialising in food allergen management, food allergy, and risk assessment. This year Professor Dianne Campbell accepted an invitation to join the panel. The VSEP were instrumental in assisting the Allergen Bureau to distil the science behind ED<sub>05</sub> Reference Doses (RfD), explaining the evidence and factors underpinning the recommendations by the FAO/WHO Expert Panel in 2022. They also assisted the Allergen Bureau to set a Risk Management Value for 'Mollusc', an important regional allergen that did not have a value in the VITAL 3.0 Program

### Data and Resources Supporting VITAL 4.0

Our major focus in FY23-24 was preparing our stakeholders for the transition of the VITAL Program to VITAL 4.0 (underpinned by ED<sub>05</sub> based RfD). The Allergen Bureau commissioned a survey to review the data underpinning risk-based PAL's. This information is an important part of the puzzle as we look to scientifically establish the impact that a transition to ED<sub>05</sub> may have. The small study showed that, across various categories, approximately 19% of products with a PAL currently may be expected to remove this statement as artwork is updated. Whilst appearing modest, when applied to the number of packaged food products available in retail, this will be an important step change towards safely increasing the foods available to consumers with food allergy. The survey also assisted us to understand some misconceptions and educate stakeholders as to why products carry PALS, how they are derived and why they are meaningful.

### Food Consumption Data for Allergen Risk Assessment.

Based on the FAO/WHO Expert Committee recommendations, the Allergen Bureau has been exploring the use of standardised Reference Amounts for product categories, based on a dietary consumption data, set at a p50. This has involved collaborating with experts in this field to assess how consumption data can be used to support allergen risk assessments. Allergen Bureau agree the incorporation of standardised Reference Amounts further strengthen the science underpinning a quantitative risk assessment, A financial commitment for a pilot was allocated, however the Allergen Bureau Board after a considered review, have concluded that the organisation currently does not have the various resources required to commercialise this project. Any members or organisations interested in assisting us to fund this project are welcome to contact us as we continue to explore ways to provide businesses with easily accessible consumption-based Reference Amount information.

### Promoting an evidence-based scientific approach

The Allergen Bureau's website and our monthly eNews continued to be a focus of our efforts to inform the food industry on science-based approaches to food allergen management.

The eNews has a global readership of over 8000 and remains committed to bringing information to subscribers on the latest thinking in food allergen research, science and information pertaining to consumers and industry.

Table 2. Allergen Bureau eNews last three Financial Years.

	Financial Year		
	<u>2021-22</u>	<u>2022-23</u>	<u>2023-24</u>
eNews subscribers	8863	8550	8123
# allergen science articles /year	24	23	27
# allergen guidance/regulatory articles / year	N.A.	14	21

## 2. Best practice allergen management guidance and resources

The Allergen Bureau has continued our collaboration with AFGC, FSANZ, food enforcement authorities, and key stakeholders in relation to questions and inquiries we receive.

### VITAL 4.0 Summary and FAQ’s and the Food Industry Guide to Voluntary Incidental Trace Allergen Management (VITAL) Program

A major focus this year has been the VITAL 4.0 summary and FAQ document. Designed to support industry during the launch of VITAL 4.0, the document explains the science behind the data set underpinning the ED<sub>05</sub> RfD and how they have evolved. The document was developed with VSEP input, to assist businesses in answering questions they may receive as they transition to using VITAL 4.0.

Other minor updates have been made to existing resources to align definitions and examples. Whilst on the surface the change in Reference Doses underpinning VITAL calculations seems significant, the changes to existing guides have been minimal. The VITAL program has always been underpinned by the ethos to *Avoid, Eliminate, and/or Reduce* cross contact allergens to the lowest possible level. This philosophy has not changed, and businesses using the VITAL Program will therefore find nothing at an allergen management level on site should change. We anticipate, as soft changes are made to labels, a reduction in the number of PALs required for homogeneous cross contact risk.

### Allergen Bureau Website

All resources can be found on the Allergen Bureau website resources page [Allergen Bureau Resources](#).

Interest in our content continues to increase, reflecting a growing awareness of the Allergen Bureau and its resources. Newsletter articles continue to be a popular reason for site visits, and we are also pleased to see strong engagement with our resources overall. The VITAL Reference Doses, along with the science and application of the VITAL Program, continue to attract significant interest.

We are encouraged by the increased activity on the Risk Review Website. However, recalls due to labelling errors remain more frequent than anyone would like. To mitigate this, it is crucial that raw material reviews, product changeover methods, and cross-contact controls are consistently evaluated. We have designed the Risk Review Website to support users to identify these risks.

Table 3. Our website statistics<sup>1</sup>, Comparison between F22 and F23

Financial Year			
	<u>2021-22</u>	<u>2022-23</u>	<u>2023-2024</u>
<b><u>Allergen Bureau website</u></b>			
Unique website visitors	35,000	19,000	66,704
Website sessions	45,500	25,200	88,026
Website page views	166,500	95,300	128,839
<b><u>Allergen Risk Review website</u></b>			
Unique website visitors	1,300	800	1425
Website sessions	1,800	1,100	2668
Website page views	8,900	5,200	6067
<b><u>VITAL Online website</u></b>			
Unique website visitors	6700	4800	8277
Website sessions	17,200	16,000	26394
Website page views	194,100	214,400	396,694

### Allergen Bureau Working Groups and focus areas

Working Groups are led and resourced by Allergen Bureau member company volunteers, with support from a Board Member/s and/or the Allergen Bureau Manager.

McDonald's is leading a Working Group to develop a QSR Best Practice Allergen Management and Labelling guide, focusing on consistent online allergen information to help consumers make informed choices. Challenges include varied IT systems, proactive communication of in-house risks for changing menus, and simplifying allergen information for consumers. This group is the first to include direct input from non-members, whose contributions have been invaluable. We anticipate publishing these resources and look forward to continued support.

The Allergen Bureau is addressing consumer uncertainty about suitable product choices by updating the VITAL Standard and registering a VITAL Certification Trademark. Despite some initial reluctance towards additional audits and/or on-pack marks, we are nearing completion of this registration in our test market, New Zealand. A certification mark, valid for 10 years, will provide flexibility to adapt to evolving consumer and industry needs. A decision on certification in Australia will follow the outcome in New Zealand. Member meetings have also explored alternative solutions to help consumers identify products risk-assessed under the VITAL program, and alternative ways to ensure consumer confidence in the precautionary allergen information provided.

<sup>1</sup> Non-bounce sessions. In a non-bounce session, the person interacted with the entrance page. Bounce sessions occur when the person leaves the website from the entrance page without interacting with the page. Website statistics are rounded to the nearest one hundred.

**Technical and VITAL helpline support**

The Allergen Bureau provides free priority Helpline services to our members, and to non-members on a case-by-case basis, providing expert advice on enquiries regarding general allergen management and the VITAL Program.

As the deadline for Plain English Allergen Labelling (PEAL) loomed, the helpline was busy helping food manufacturers big and small produce PEAL compliant labels, with enquiries accounting for up to 25% of contacts this financial year. One quarter of the questions answered related to risk assessment and appropriate PAL labelling and a further 10% related to questions on allergen analysis and testing. Labelling of sulphite, glucose syrups and appropriate use of free claims are common enquiries.

Table 4. Technical and VITAL helpline support, last three Financial Years.

Financial Year			
<u>Helpline enquiries requiring expert response</u>	<u>2021-22</u>	<u>2022-23</u>	<u>2023-24</u>
General allergen management /labelling enquires	61	68	83
VITAL “how to” enquiries	32	20	30
<u>TOTAL</u>	<u>93</u>	<u>88</u>	<u>113</u>

**VITAL Training**

VITAL training supports industry understanding and implementation of the VITAL Program; the VITAL Standard; and VITAL Online. There are currently 23 VITAL Training Providers across Australia, New Zealand, and internationally.

A total of 218 people were trained in VITAL science in F22-23 with 68% of these from ANZ and 32% from elsewhere around the globe.

Members are encouraged to contact individual VITAL Training Providers to discuss their VITAL Training needs. A full list is available on our [VITAL Online Website](#).

**3. Key stakeholder acknowledgment**

**Codex Committee on Food Labelling (CCFL) Electronic Working Group on Food Allergen Labelling**

The Allergen Bureau continues to provide input through the Australian Department of Agriculture, and MPI New Zealand on Codex consultation papers related to allergen labelling in the General Standard for the Labelling of Prepackaged Foods (GSLPF).

**FSANZ, MPI & Australian Enforcement Agencies**

The Allergen Bureau collaborates with all parties to ensure consistency and understanding in allergen risk review, management, and communication. We have discussed several industry issues and resources with these parties, particularly when jurisdictions have taken different actions in response to issues, data or resources. This is central to all parties achieving greater awareness and understanding and assists all stakeholders as we strive for a harmonised approach to Allergen Risk assessment and labelling.

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**Australia New Zealand Food Allergen Collaboration**

The ANZ Food Allergen Collaboration, established by FSANZ, aims to enhance stakeholder engagement. The Allergen Bureau actively participates in steering meetings and broader discussions.

**Publications**

The Allergen Bureau was featured in Food New Zealand, Undark Magazine, and Foods Connected, discussing the benefits of harmonised Reference Doses for allergen risk assessment and labelling, as well as industry challenges in allergen management and recall reduction. We completed a PAL survey with industry support, helping to assess the impact of the ED<sub>05</sub> based Reference Dose on PAL statements. Findings from the study are being prepared for publication and are already aiding in managing labelling expectations and understanding PAL drivers.

**Consensus Statement**

Collaboration continues with key stakeholders in Australia and New Zealand to refine the Allergen Consensus Statement to include responsibilities of additional stakeholders (Health Care Professionals and enforcement agencies), as well as including stakeholder responsibilities for PAL statements. Led by the National Allergy Council (NAC), the update is expected in Q4 2024. This work highlights nationwide collaboration efforts to improve consumer food choices within the food allergy network, showcasing Australia's leadership in this field.

## **4. Global influence and brand recognition**

**International forums**

Jasmine Lacis-Lee, Allergen Bureau President, attended the Food Allergen Forum in Amsterdam in November 2023, a key event for European leaders in food allergy research and management. She also presented at the FARRP Member Meeting in North America in February 2024. These engagements provided insights into global attitudes of companies and governments toward allergen risk management and communication and allowed the Allergen Bureau to showcase its best practice guides and ongoing work within the industry and allergen community here in Australia, and reinforced Australia's leadership in many areas.

**Industry presentations**

The Allergen Bureau delivered over 20 presentations across the year, some specifically for Member organisations such as retailers or service providers, some for Associations or global Industry Groups who were interested to hear details on how the Allergen Bureau was progressing the change of the VITAL Program to a Reference Dose based on ED<sub>05</sub>, developments in Australia and New Zealand or information on Best Practice Allergen Risk Review, Allergen Management or Allergen Communication.

We were also invited by Allergy & Anaphylaxis Australia to present directly to consumers together with FSANZ, on PEAL legislation and Precautionary Allergen Labelling. In this session we discussed with attendees why allergen risks exist in food, how the food industry works to manage those risks and why PAL's derived under the VITAL program should not be ignored.

All the presentations are available on our website page [Conference Presentations](#) webpage



**Exhibits**

With the help of Allergy and Anaphylaxis Australia the Allergen Bureau also attended and exhibited at the Food Service Exhibitions in Sydney, along with the 'FREE FROM Exhibition', showcasing our resources and how they can assist industry to manage allergen risks.

**Marketing and Communication**

In 2024, the Allergen Bureau has strengthened brand recognition through dedicated marketing and communication efforts across key social media platforms – Facebook, LinkedIn, Instagram, and X (Twitter). LinkedIn remains our primary focus, helping us build local and global brand awareness, engage with key audiences, and drive traffic to our website resources. We are also leveraging social media for issues management and sharing news and events, with the recent launch of our LinkedIn online newsletter, significantly boosting reach and engagement.

Organic growth continues steadily across Facebook, LinkedIn, and Instagram, with LinkedIn showing substantial growth at 21% year-on-year, achieved with minimal ad spend. Our 2024 communications strategy focused on the transition to ED05, the development of VITAL 4.0 FAQ communications, and stakeholder engagement, while also preparing key messaging for events such as AIFST to help us engage with targeted audiences about new Reference Doses.

Social media, particularly Instagram reels and video content, will play a crucial role in engaging with a younger demographic of food professionals managing food allergens, while LinkedIn remains central for building credibility and expanding our global network. As we prepare for our 20th anniversary in 2025, our communication efforts will focus on this milestone and the launch of our new strategic plan, which now includes education and consumer pillars. All marketing activity aligns with our Strategic Plan, ensuring objectives and actions support our overarching vision and mission.

*Table 5. Allergen Bureau social media followers, last three Calendar Years*

Platform	Calendar Year			
	<u>2022</u>	<u>2023</u>	<u>YTD 2024</u>	<u>% Growth YA</u>
Facebook followers	1019	6100	7365	21%
LinkedIn followers	1064	2011	2441	21%
Instagram followers	147	211	248	17%

**5. Good governance and financial sustainability**

**Allergen Bureau Strategic Plan 2021-2025**

The Strategic Plan 2021-2025 has continued to guide the Allergen Bureau's objectives, budgets, and operations throughout this financial year. The Board is finalising the Strategic Plan 2025-2028, and we look forward to presenting the new plan to our members for discussion on focus areas and implementation during our October AGM.

**Risk Management and Data Security**

Risk management remains a priority for the Allergen Bureau, with a continued emphasis on data security in a volatile IT landscape. In response to users feedback, we have adjusted the two-factor

authentication process to improve user experience. We also refined the free trial platform after feedback indicated users were inappropriately generating reports suggesting all allergens were required in PAL statements. In addition, the review indicated some organisations were repeatedly accessing the free trial to meet ongoing business needs. The two issues, overlaid with increased investment requirements in security and functionality, resulted in a decision to allow free trial users to experience the system without generating reports. This adjustment allows us to direct light users towards training, where they can learn the principles of the VITAL program beyond just VITAL online usage for specific labelling or customer requirements. It also ensures revenue is optimised to support future investment requirements.

Additionally, we have updated the Terms and Conditions for VITAL 4.0, and in the future will require all account owners to acknowledge these terms, including provisions for protecting intellectual property.

### System Enhancements

Our IT service provider is developing a virtual 'testing harness' to help maintain a high level of system accuracy and reliability. Managed by the Allergen Bureau, this tool will increase assurance to users by monitoring for coding or logic errors. Deployment of this enhancement to VITAL Online is expected by April next year. We have also put through some small enhancements as a part of the VITAL 4.0 update, designed to assist users and strengthen the system.

### Communications Training

With an increasing demand for news articles and a growing emphasis on consumer communication, communications training was provided to selected staff and board members to enhance our outreach capabilities.

### 11th Annual General Meeting and Member Meeting

The 11th Annual General Meeting of the Allergen Bureau was held on 26 October 2023, the AGM was attended in person and online by representatives of 14 Full Members, and 3 Associate Members.

### Allergen Bureau Board

The Allergen Bureau Board up to the 12th AGM was:

#### Elected Directors

- Jasmine Lacis-Lee (Continuing), President
- Caroline Gray (Continuing), Vice President
- Debbie Hawkes (re-elected 2023), Treasurer
- Paul Kelly (re-elected 2023), Company Secretary

#### Invited Directors

- Dean Stockwell (reappointed 26/10/2023)
- Kirsten Grinter – (reappointed 26/10/2023)

Our Directors provide voluntary, unpaid services to the Allergen Bureau and we gratefully acknowledge the generous support they and the Allergen Bureau receive from their employer companies in this capacity.

The Allergen Bureau Board held five Board meetings during 2023-24.

### Allergen Bureau Management Committee

The Allergen Bureau Management Committee was:

- Kirsten Grinter
- Caroline Gray
- Debbie Hawkes

- Jasmine Lacin-Lee
- Jess Feather (Woolworths)

With assistance from

- Lisa Clark, Allergen Bureau Manager
- Tom Lewis, Allergen Bureau Advisor

The Management Committee are responsible for planning and management of Allergen Bureau activities in line with the annual operating plan and budget.

The Allergen Bureau Management Committee held 17 meetings during 2023-24.

Fortnightly Management Committee operational teleconferences remain the mainstay of how the Allergen Bureau operates. Out-of-session discussion, generally by e-mail, constitutes a large proportion of Allergen Bureau management and operational communication.

### Secretariat and Support

The Board would like to thank Lisa Clark, Alice Doyle and Tom Lewis for their ongoing support in the provision of secretariat, financial and management services.

The Board also thank our support service providers: Dr Simon Brooke-Taylor (Scientific & Technical Support and VSEP representation); Georgina Christensen (previous VITAL Coordinator); Nicole Koek (current VITAL Coordinator) Dr Lyn Davies (eNews); Natalie Hayllar (Marketing and Communication); Progressive Content (website content and EDMs); Ionata Digital (website development and service); and Graeme Clark (IT Consultant); who all made significant contributions to the success of the Allergen Bureau.

### Financial sustainability

Reviewed financial statements and notes, prepared in accordance with the *Corporations Act 2001*, give a true and fair view of the financial position at 30 June 2024 and of the performance for the year of the Company in accordance with the accounting policy described in the financial statements. These are prepared and presented to members separately.

As a Tier 2 NFP organisation we are not required to commission an annual full financial audit, however the Directors have always opted for an annual audit in the interests of good governance and full transparency. The company is currently in the process of changing its auditor, to be discussed at the 2024 AGM. As such a full financial audit has not been completed for the current reporting period. However, an independent review of the financial statements is being conducted by Bentley's Tasmania. This review will be performed in accordance with the relevant standards to ensure the accuracy and reliability of the financial information presented.