

ALLERGEN WORKING GROUP – Food Allergens



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Food Safety Unit



- FSU is part of the Victorian Department of Human Services
- Responsible for administering and enforcing the Victorian Food Act 1984
- Enforcement of Food Standards Code

Presentation Structure



- Allergen Recalls
- Food Standards Code – Standard 1.2.3
- Terminology
- Threshold levels
- Statements
- Analysis
- Progression

Food Recalls



- Government testing
- Company investigation
- Consumer complaint

Food Standards Code



- Mandatory declaration
 - Required by Food Standards Code
- Standard 1.2.3
 - Mandatory declaration of certain substances in food (Clause 4)

Food Standards Code



- Mandatory declaration of certain substances in food [clause 4]
 - The big eight
 - Presence must be declared
 - On label (Retail), otherwise displayed or provided on request [verbal option?]
 - Ingredient, sub-ingredient, additive, component, processing aid or component

Declaration



- Label may include allergens as
 - Part of ingredient list
 - Independent of ingredient list
 - Statement
 - A combination of all above
- A single declaration may assist the target consumer

Terminology



- Purpose of the Standard is to alert the consumer at risk
- Use of technical terminology may obscure that purpose.
- Caseinates not always associated with milk by consumers
- Technically the use of Scientific Names meets the standard - Best Practice???
- Declaration as milk/milk product would be more effective, option to qualify (in brackets)

Threshold Levels



- Declaration is required regardless of level of ingredient, additive or processing aid
- Level of safety may differ between individuals
- Issue with “contact” contamination
- NOAEL and LOAEL
- FDA

Statements



- “Product is manufactured in a Factory that contains Peanuts”
- “Product is manufactured on the same line as products that contain peanuts”
- “May Contain”
- Allergen Free Claims – Make sure they are true
- Consumer Confusion, Consumer Risk, Consumer Frustration
- Make Allergen Statements Useful
- Avoid “blanket” statements
- Companies moving from such statements

Statements – “May Contain”



- No specific obligation in the Code (Silent)
- Food Authorities may use emergency powers to prevent the possibility of a serious danger to public health
- “May contain” may be deceptive where presence is unlikely
- Food businesses have duty of care

Analysis



- Which protein
- Which test kit
- What sensitivity
- Limitations

Typical Complaint



- Phone call – My son/daughter is allergic to “milk” and I KNOW it was PRODUCT X. This product must be removed from sale
- FSU – Does the ingredients list the allergen or any products of the allergen?
- Complainant – NO
- FSU – Any statements regarding Allergens?
- Complaint – Yes “May contain traces of nuts, dairy products, eggs or seeds”

Typical Complaint



- FSU – OK, before we take any action we need to analyse the product and conduct an investigation
- Complainant- How long will that take is my word not good enough my child nearly died????
- FSU- I need you to contact the Local Council and they will get the product analysed. We will also contact the manufacturer.
- Complainant – OK give me the number

Typical Complaint



- FSU contacts the Local Council-
- FSU – We need to analyse the remaining product plus five sealed samples of the same product and batch, if possible. Can you analyse the product for casein and B. Lactoglobulin. Can you also investigate what happen? Where? How?
- EHO – No problem will submit the samples today

Typical Complaint- Results



Statements on the COA

“ Casein: Possible trace at less than 1ppm”

“B. Lactoglobulin: A Low reading was obtained by Elisa, however, this was less than one tenth of the reading for the 1ppm control and is most likely to be background”

Typical Complaint- Systems



- Company has an Allergen Policy
- Allergen Management System
 - Training
 - Raw material control
 - GMP
 - Testing

Typical Complaint -Results



- FSU – Action
- The company informed the packaging had been superseded.
- Allergens Identified are now in bold and “May Contain” removed
- The Company had reviewed their processes after attending the Workshop in Sydney

Typically Complaint



- FSU – contacts the complainant and explains the results and the companies action
- Complainant “ Thank you for that I get upset. I’m please industry are taking this issue seriously”

Progression



- Level of understanding
- Establish thresholds if possible
- Agreed analysis
- Standard needs revisiting
- “NEW” allergens

Initiatives



- Individual Companies – holding Allergen seminars for their suppliers
- Industry Association – AIFST and AFGC
- Allergen working Group – Projects
- FSU is encouraged and interested in these developments
- FSU initiatives

Contacts



- Food Safety Unit

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