



Te Pou Oranga Kai O Aotearoa

Food Allergen Labelling

Ursula Egan



NZFSA Mandate

“Safe and suitable food is our priority”

NZFSA MANDATE September 2008

- “.. to protect consumers by providing an effective food regulatory programme covering food produced and consumed in New Zealand as well as imports and exports of food products.”
- The new statutory mandate emphasises, “In pursuing this mandate the overriding priority will always be to protect consumers.”



NZFSA responsibility

Responsibility

- for the protection of New Zealanders' health and safety and the facilitation of commerce and international market access
- to ensure that the food New Zealand produces, exports and imports is safe and suitable for our domestic and international consumers



Role of NZFSA

NZFSA's roles include

- input into the development of joint Australian and New Zealand food labelling and compositional standards
- the development of food safety and production standards
- implementation and enforcement of all food standards
- representing New Zealand at international food standards and food safety fora
- policy development
- provision of advice on all food-related matters.



NZFSA and allergens

- Allergen standards review
- Allergen queries/complaints from public and industry
- Food recalls
- Resource development consumers/industry
- Stakeholder relationships
- ESR allergen projects
- MFD contract



Why allergen labelling?

- Health and safety of consumers
- Labelling requirements based on degree of risk to health and safety of consumers





Food allergen labelling

Standard 1.2.3 (Australia New Zealand Food Standards Code)

- Mandatory advisory statements and declarations
- Mandatory warning statements and declarations
- Mandatory declaration of certain substances in food
- Advisory statement for foods containing polyols and polydextrose



Mandatory advisory statements and declarations

- **Bee pollen/propolis** presented as a food or a food containing bee pollen/propolis as an ingredient
- **Mandatory advisory statement**
“statement to the effect that the product contains bee pollen/propolis which can cause severe allergic reactions”
- **Statement** must be on label or if food is exempt from bearing label displayed on or in connection with the food or provided to the purchaser on request





Mandatory warning statements and declarations

- **Royal jelly** as a food or a food containing royal jelly as an ingredient
- **Mandatory warning statement:**
“This product contains royal jelly which has been reported to cause severe allergic reactions and in rare cases fatalities, especially in asthma and allergy sufferers”
- **Warning statement** must be on label or displayed on or in connection with the food if food is exempt from bearing label





Mandatory declaration of certain substances in food

- **Cereals** containing gluten and their products (wheat, rye, barley, oats and spelt) except when present in beer and spirits
- **Crustacea** and their products
- **Egg** and egg products
- **Fish** and fish products except isinglass
- **Milk** and milk products
- **Peanuts** and **soybeans** and their products
- **Tree nuts** and **sesame seeds** and their products
- Added **sulphites** in concentrations of 10mg/kg or more





Mandatory declaration of certain substances in food

- Substances must be declared on label when present in food as
 - an ingredient
 - an ingredient of a compound ingredient
 - a food additive or component of a food additive
 - a processing aid or component of a processing aid
- Food Standards Code generally silent on how substances should be declared on label
- If food is exempt from bearing a label declaration must be displayed on or in connection with the food or declared to purchaser on request



Unintentional cross-contact

- Food allergen not added intentionally
 - cross-contact or ingredient in supply chain
 - shared equipment/process during manufacture
- Cross contact may not be able to be totally eliminated



May contain statements

- Not regulatory requirement
- Can be confusing
 - ‘may contain xxx’, or ‘made in a facility that also makes products on the same production line containing xxx’*
- Allergic consumers don't always understand the risks presented by such statements



VITAL

- Voluntary Incidental Trace Allergen Labelling (VITAL)
 - provides a risk based methodology for food producers to use in assessing the impact of allergen cross contact and identify appropriate allergen precautionary labelling.
- Not regulatory requirement



Recalls

FOOD RECALL ALLERGEN WARNING

YOUR Company Name
Brand Product_Name
Pack details,
Batch Information

Your company are initiating a recall of their XXX after discovering that the product had been incorrectly labelled. The product contains YYY which is not declared on the label.

Consumers who are allergic to YYY are advised not to consume this product. Any person concerned about their health should seek medical advice.

The product is sold in ZZZ . Consumers who are allergic to YYY should return the product to their retailer for a full refund or phone 8888888 with any queries.

This recall does not affect any other product.

(Company Logo inserted here)



Allergen recalls

- NZFSA responsible for NZ food recalls
- Number allergen recalls constant
- Represent 1/3rd recalls in NZ
- 2 of 4 recalls in 2010 for undeclared allergens



NZFSA allergen resources

Consumer

- *'Eating safely when you have food allergies'*
- Recalls, alerts, information
- Media releases

Industry

- Labelling guide
- Recalls, alerts, information
- Media releases

<http://www.nzfsa.govt.nz/>





Manufactured Food Database

MFD contract

- Consumer resource providing listings of manufactured foods available in New Zealand that are suitable for people with some common food allergies or intolerances

<http://www.mfd.co.nz/>



ESR Projects

- Allergens in Food Processing: Industry Case Studies 2008
- Evidence to Support Allergen Labelling Exemptions 2010



Allergen labelling exemptions

- Cereals when they are present in beer and spirits
- Isinglass derived from swim bladders and used as clarifying agent in beer and wine
- Current ESR research project
 - vinegar and alcohol derived from milk
 - glucose syrup from wheat