



VITAL Training: Measuring or Managing

Bill McBride, AFS
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Who are Advancing Food Safety?

- A privately owned Company employing food industry experienced people
- Train in Food Safety and HACCP in Australia, New Zealand and USA
- Courses are offered both internally to suit company needs, and externally
- Advancing Food Safety is a Registered Training Organisation (RTO)



What else does AFS have to offer?

- Principles and Application of HACCP
- Principles and Application of HACCP for Produce
- Food Microbiology for Non-microbiologists
- Food Safety QA Management (2 courses)
- Internal Food Safety Auditor
- Lead Food Safety Auditor
- Shelf-life Validation and Verification
- SQF Implementation & Auditing
- WQA & HACCP



Allergen Management Courses

- Allergen Management for Manufacturing (full day)
- Allergen Management for Food Service (full day)
- Allergen Training – VITAL (half day)

Total attendees	
2007 -	21
2008 -	717
2009 -	371



Allergen Management Training

Allergen Management

- Definitions
- Food Standards Code requirements
- Allergies, intolerances and other adverse health effects
- Level of sensitivity in the community
- Cost of getting it wrong
- Management of “allergens”
- Verification and Validation
- Use of the VITAL Tool

VITAL

- Allergens as an issue
- AFGC initiatives for allergen management
- Regulatory issues with allergen statements
- The VITAL Tool
- Allergen precautionary statements
- Auditor expectations



Allergen Management Training (inc VITAL)

Trainers comments:

(Ross Peters, Damien Alexander, Stephen Brand)

- “Learning experience for all parties”
- “There was a lack of understanding or general awareness of allergens”
- “Many industry people tried to use the VITAL tool but had difficulty until they attended training or workshopped it with others”
- “Much less resistance now than there was before”

So what have we learned?

1. Allergens? What allergens?
2. VITAL or MITAL?
3. Measure or Manage?
4. PIF overload
5. A blunt instrument?
 - Vaguaries
 - Particulates v Dispersables
 - “Breakpoints”
6. But the auditor told me.....



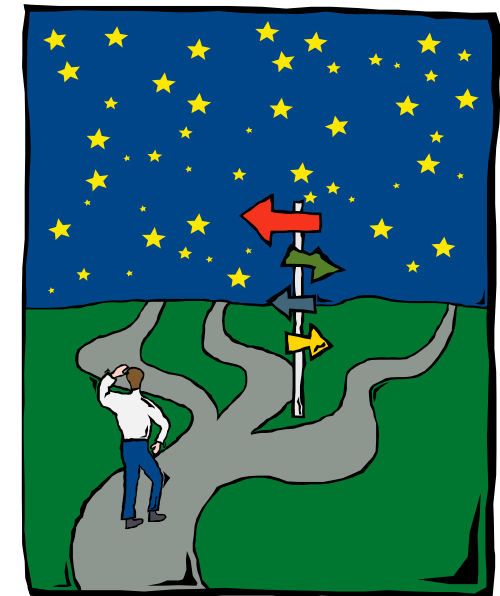


1. Allergens? What Allergens?

- Academic understanding of Standard 1.2.3, but
- Lack of industry understanding of allergens as a “real” food safety issue
- Food safety associated with microbiological contamination. Lack of urgency, seriousness with allergens
- “Head in the sand” approach.
 - “We declare *intentional* allergens but we don’t have any *cross contact* allergens”.
 - “Our suppliers wont provide cross contact information”
 - “We’re only a small in-store bakery. I’ve never known anyone to get sick from sesame seeds”

2. VITAL or MITAL? (Voluntary or Mandatory?)

- Regulations silent on labelling of “cross contact” allergens
- Industry does not have a uniform process for labelling
- Industry is criticised for the inconsistent and often blanket approach to precautionary allergen labelling.
- Allergic consumers are confused and take risks
- Reduces the value of precautionary labelling as a risk management measure





Voluntary or Mandatory (contd)

- Which works better – the carrot or the stick?
- “Voluntary” only works if there is an incentive to do so
- Enforcement has been commercial rather than regulatory:
 - “We’re only doing this because WW requires us to”.
- “Mandatory” has been effective in educating and persuading industry
 - “We now understand the benefits in measuring, controlling and reducing cross contact allergens”

3. Measure or Manage?

- “Precautionary statements must NEVER be used as a substitute for good manufacturing practice (GMP) or as a generic disclaimer.”
- “Unavoidable cross contact”
- “a review of the ability to reduce the allergenic material from all contributing sources”





3. Measure or Manage (contd)?

- Receipt and storage of raw materials
- Segregation of allergenic and non-allergenic materials
- Production scheduling
- Equipment and plant design
- Cleaning procedures
- Control of rework
- Employee traffic flows
- Post-manufacturing control
- New product development

4. PIF Overload

- “Suppliers wont provide a PIF”
- “Do we need to use the PIF to collect cross contact allergen information?”
- “What if some PIFs are not available, or if there are known/suspected gaps in the PIFs?”
- “What about overseas suppliers?”
- “Most of this stuff is already in our specifications”
- “We need to set up a department to supply PIFs to our industry customers. Some of them are small players”

5. A Blunt Instrument

- Traffic light system – banded
- Based on action levels
 - VITAL - Vaguaries
 - VITAL - Particulates v Dispersables
 - VITAL - “Breakpoints”

Action Level 1: no declaration

Action Level 2: precautionary statement
“May be present”

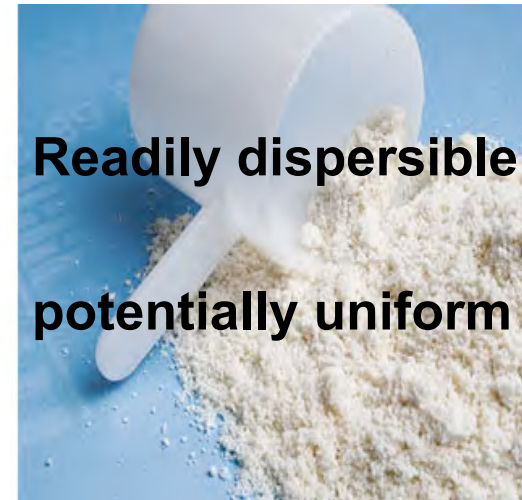
Action Level 3: must label



VITAL – “Vaguarities”

- Guidelines: “The worksheet is designed to assist in defining ONLY the risk related to cross contact with allergens”
- VITAL should be followed for each allergen that may be present in the final product due to cross contact
- It is not designed to deliver total safety in relation to food allergen risks. It does not guarantee that a consumer eating the food will not suffer any allergic response
- Step 1 RM impact: “Raw material allergen content – intentionally added”
- If it’s already an intentional allergen, (ie in the red zone), why calculate the cross contact level?
- Sensitivity levels of the “bands”. Debate within industry – what if we don’t declare an allergen (green zone) and a consumer has a reaction?

Particulate v Dispersible

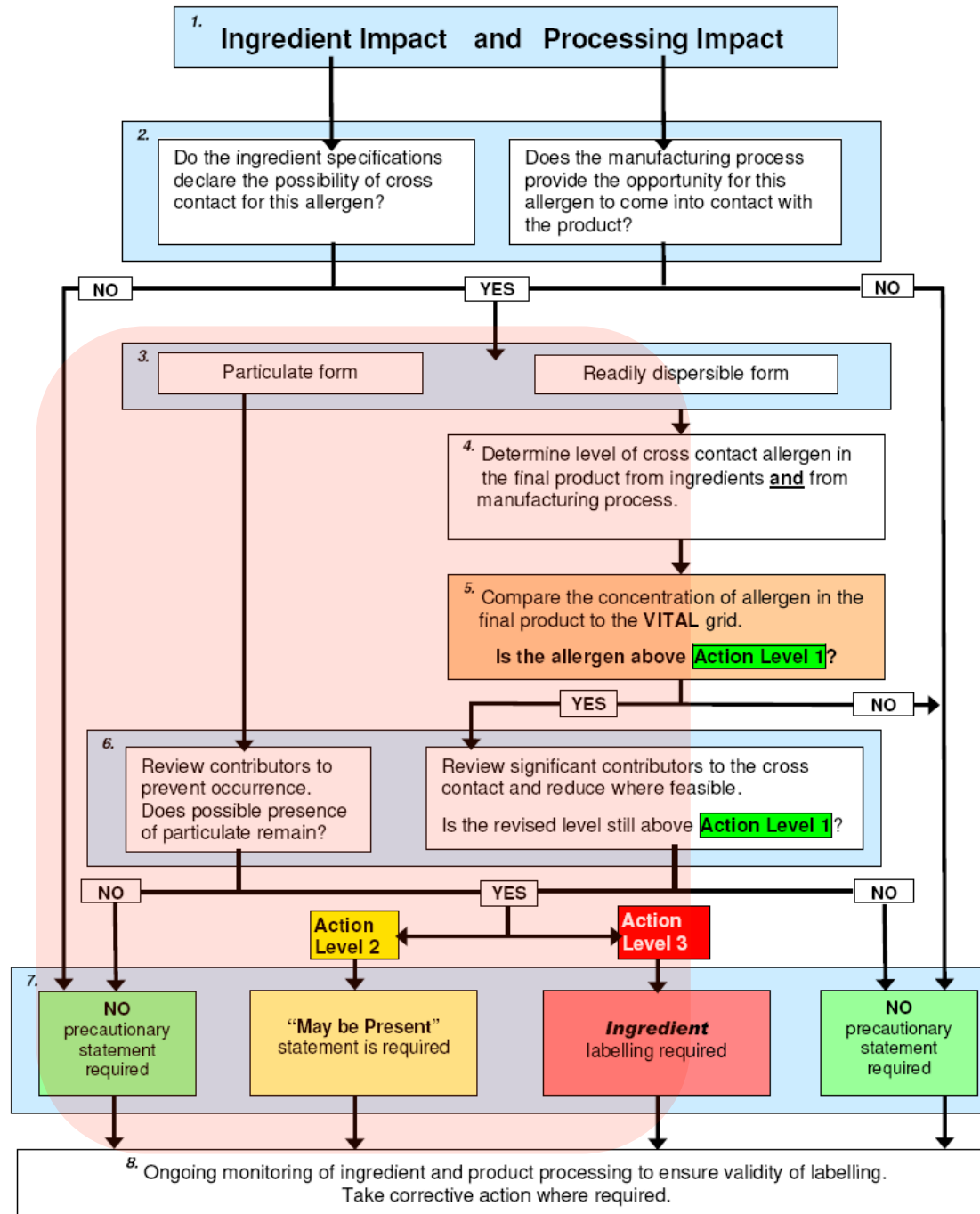


- When does dispersible become particulate (eg clumping, moisture uptake)?
- Hang-up points generally not evenly dispersed
- Particulates not adequately dealt with (precautionary statement)



VITAL Decision Tree

as at 12 June 2007



“Breakpoints”

- “Breakpoint” is the level of cross contact allergen that must be present to require a precautionary/mandatory statement.
- Can be used if not all information is known. Work it back from threshold levels (eg 2 – 20 ppm of total protein for peanut)
 - Consider all cross-contact sources, measurable and otherwise
 - How much would need to be in a particular batch of eg raw material to require a statement
 - Make a value judgement
 - Test to validate that judgement

6. But the auditor told me

- Have all cross contact allergens in raw materials been identified?
- Have all cross contact allergens from processing have been identified?
- Has the concentration of allergen containing protein been correctly identified?
- Have appropriate assumptions been recorded? Are they valid?
- Has the VITAL grid been used? Is the VITAL grid the most recent version?
- Does the Labelling statement follow the AFGC guide?
- Are the VITAL calculations reviewed regularly?

Summary

- Learning experience for everyone
- Resistance is lessening as awareness and experience improves
- On-going education of allergens as a relevant food safety issue needs to continue
- The PIF needs to improve – this is happening
- VITAL needs to improve – this is happening

VITAL is a very useful tool – but it needs to be used advisedly



Any questions or comments?

Thank You

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