



Allergen
Bureau

informing the food industry

Allergen Labelling Review Survey 2009

14th May 2010

Allergen Bureau Conference

Melbourne



informing the food industry

Agenda

Background

“The Guide”

Recommended Labelling Format

Results

Summary & Recommendations

Other uses for this data



informing the food industry

Allergen Labelling Review Survey 2009

- Allergen Labelling Survey Australia only at this stage
- How are Australian food manufacturers declaring allergens in
 - the ingredient list; (bold or not?)
 - summary statements; (Location)
 - precautionary statements; (what statements are being used?)
 - allergen label claims? (frequency?)
- We consider consistency will drive consumer confidence



informing the food industry

Allergen Labelling Review Survey 2009

- Are food manufacturers following the recommendations of the Australian Food and Grocery Council (AFGC) *Food Industry Guide to Allergen Management and Labelling – 2007 Revised Edition* ('The Guide')?
- Has the way allergens are declared changed since the last survey was done in 2005?



informing the food industry

FOOD INDUSTRY GUIDE TO ALLERGEN MANAGEMENT and LABELLING



<http://www.allergenbureau.net/allergen-guide/afgc-allergen-guide/>

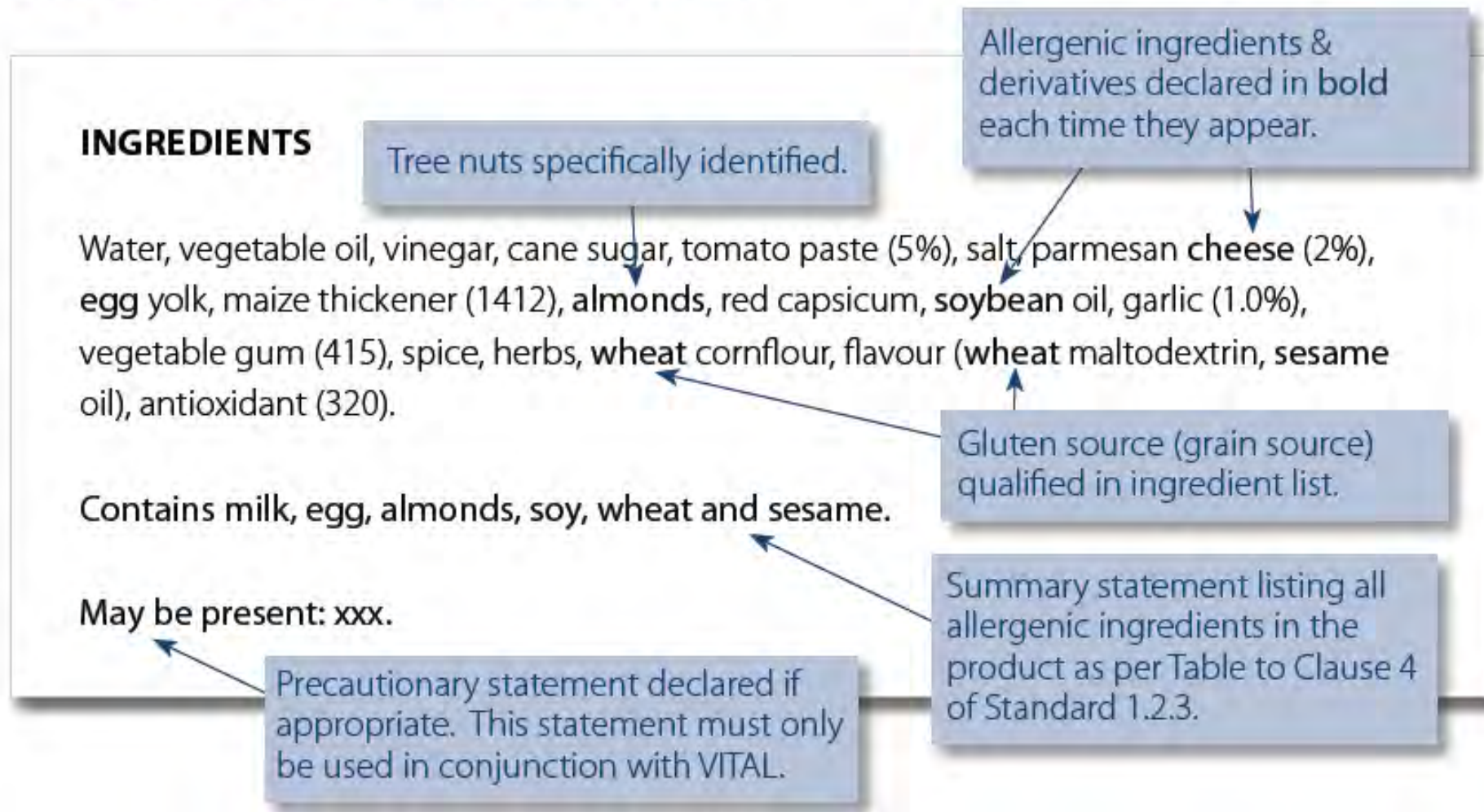


informing the food industry

Food Industry Guide to Allergen Management and Labelling -2007 Revised Edition “The Guide”

- Freely available voluntary Guide
www.allergenbureau.net
- Recommendations on Allergen Management (including VITAL) & Labelling
- Labelling recommendations include:
 - General Allergen Labelling Requirements
 - Recommended Labelling Format

RECOMMENDED LABELLING FORMAT EXAMPLE.





informing the food industry

Allergen Labelling Review Survey 2009

- beverages
- biscuits
- bread & baked goods
- breakfast foods
- canned fish
- condiments
- confectionary & chocolate
- cooking aids
- dairy
- desserts
- fruit/veg/nuts/seeds
- gravies & stocks
- infant food
- oils & spreads
- other spreads
- pasta/rice/noodles
- prepared meals
- salad dressing
- sauce
- snacks and soups.



informing the food industry

Allergen Labelling Review Survey 2009

- Products were purchased from:
 - Coles Supermarkets
 - ALDI Stores
 - Woolworths
- Products provide a representative sample
 - products with **major** shelf presence
 - products with **minor** shelf presence
 - **private label** brands
- 340 products





informing the food industry

Allergen Labelling Review Survey 2009

- Review was conducted at NSWFA
- University Students assisted with the review
- Training the students to achieve a consistent approach to label review
- Allergen Bureau Management Committee Members on hand throughout the survey data collection



informing the food industry

Results – General Information

“All allergen information should be grouped together to be easily identified and not hidden amongst other labelling information”

- Survey showed an increase in the grouping together of allergen information – ie. ingredient list, summary statement, precautionary statement should be grouped together
- For example, where a summary statement was used, 78% were directly below the ingredient list (increased from 57% in 2005)



informing the food industry

Results – General Information

“Allergens must be declared using plain English terms and be consistent with the Code”

- The survey showed positive results
- Products judged to be using plain English increased:
 - from 86% to 93% on all labels
 - from 96% to 97% on labels which have allergens declared in the ingredient list



informing the food industry

Results – General Information

“The print size should be big enough to be easily read, preferably at a minimum 1.5mm with sans serif font and the font colour should contrast distinctly from the background.”





informing the food industry

Results – General Information

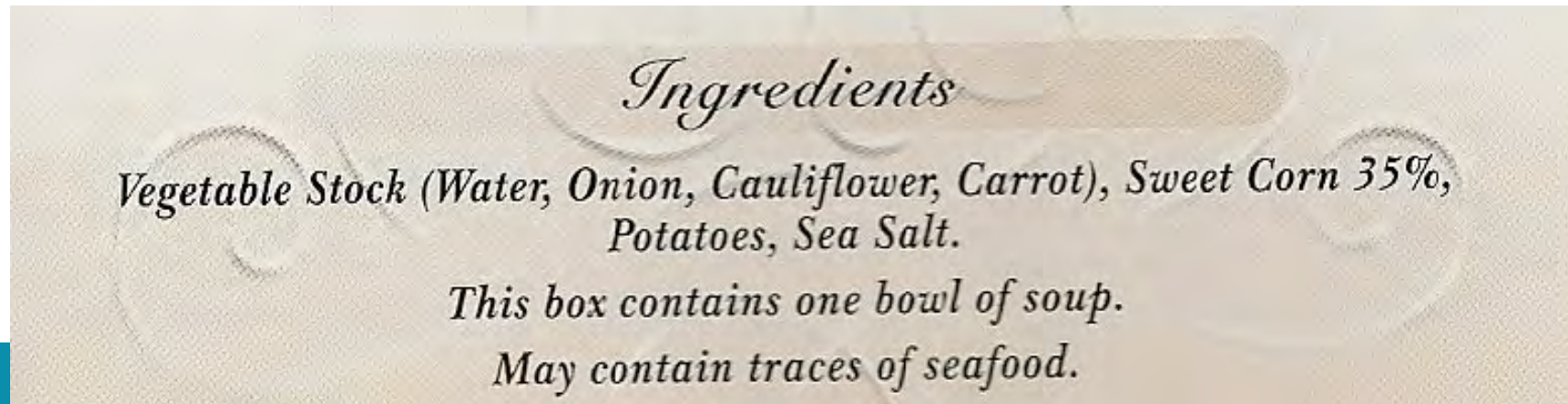
- Labels which met the minimum font size (1.5mm):
 - 77% of ingredient lists for products in 2005 and 2009
 - 80% in 2005 and 83% in 2009 for summary statements
 - 78% in 2005 and 81% in 2009 for precautionary statements
- Labels which had allergen information in distinct writing
96% in 2005 to 87% in 2009.



informing the food industry

Example

- Allergen information is in a cursive – not sans serif
 - Does this make the allergen information more or less easy to read?
- The precautionary statement is separated from the ingredient list by a serving statement





informing the food industry

Grade	GENERAL REQUIREMENTS Recommendation in The Guide	Comment
C+	Allergen Information Grouped	Improving
A	Plain English terms	Excellent, keep up the good work
B	Distinct, easy to read	Needs constant vigilance





informing the food industry

Results – Ingredient List

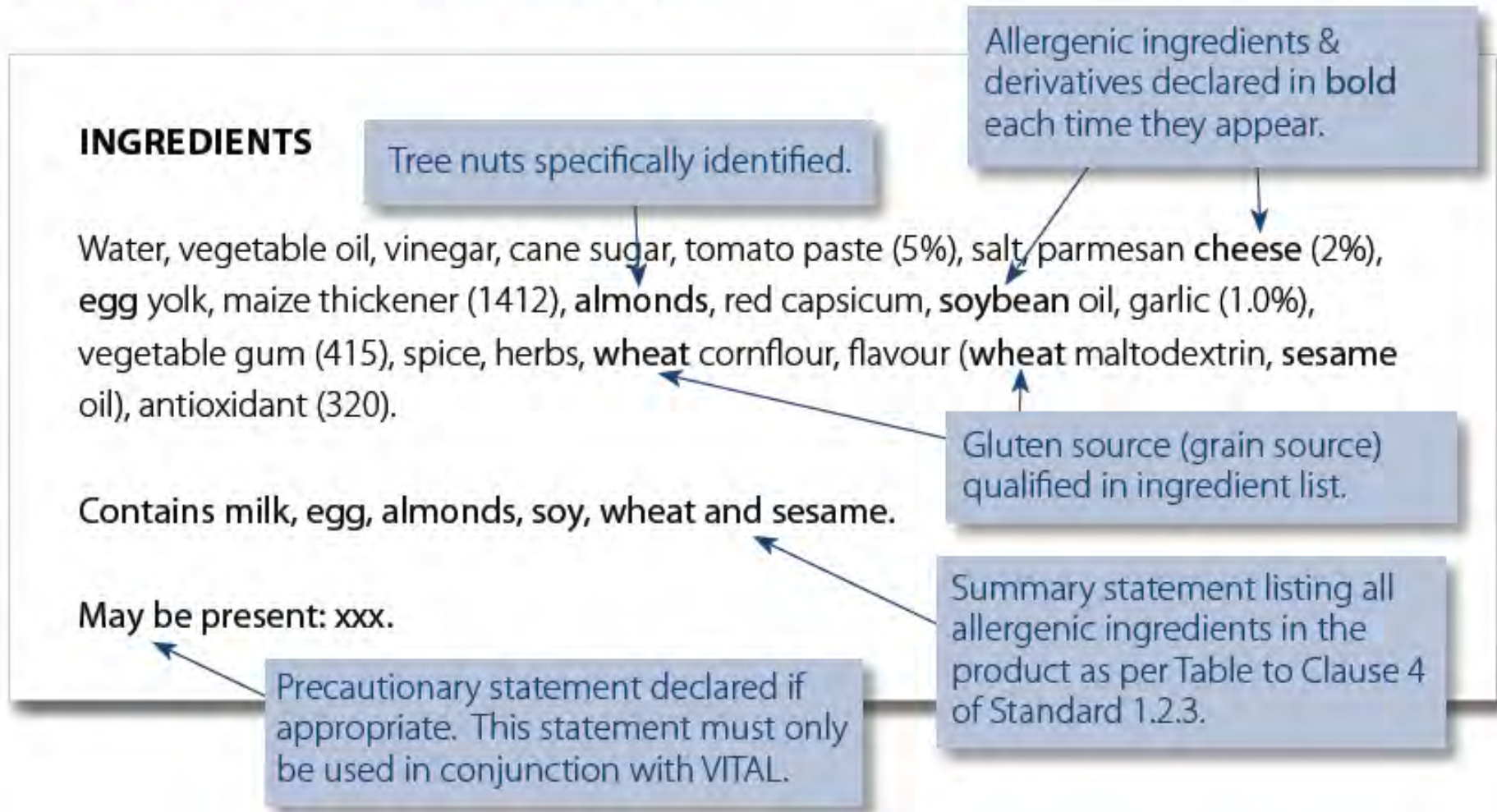
“Allergens are declared in bold type each time they appear in the ingredient list”

- Ingredient lists which contained allergens in bold type increased from 24% to 26%.



informing the food industry

RECOMMENDED LABELLING FORMAT EXAMPLE.





informing the food industry

Grade	INGREDIENT LIST Recommendation in The Guide	Comment
D	Allergens listed in bold	Not widely adopted





informing the food industry

Results – Summary Statement

“Declared as “Contains xxx...” and appears directly below the ingredient list on a separate line in bold”

(NB. “Alternative Labelling Recommendations” in The Guide also allow the use of “ingredients contain”)

- 80% of summary statements used “Contains”
- 20% used “This product contains“ or “ingredients contain”.

Example





informing the food industry

Examples

Ingredients

Apricot Halves (Min 58%), Water, Sugar, Firming Agent (509).

May contain pit or pit fragments.

Ingredients : POTATOES, SUNFLOWER OIL, VEGETABLE OIL, SALT, SUGAR, MALTODEXTRIN (CORN, WHEAT), DEXTRIN, HYDROLYSED VEGETABLE PROTEIN, SPICES (CUMIN, PAPRIKA, CHILLI, BLACK PEPPER, CORIANDER, GINGER POWDER, CINNAMON), FLAVOUR ENHANCERS (621, 951), MODIFIED STARCH (1450), TOMATO POWDER, FOOD ACIDS (262, 330), ONION POWDER, GARLIC POWDER, CORN STARCH, NATURAL COLOURS (TURMERIC, PAPRIKA, CARAMEL), FLAVOURS.

Contains gluten, milk or milk products, soybeans or soybean products, phenylalanine.

Example

Skim Milk, Cream, Sugar, Maize Glucose Syrup, Egg Yolk, Vegetable Gums (Carageenan, Locust Bean Gum, Guar Gum), Natural Flavour. Ice Cream Contains 10% Milk Fat.

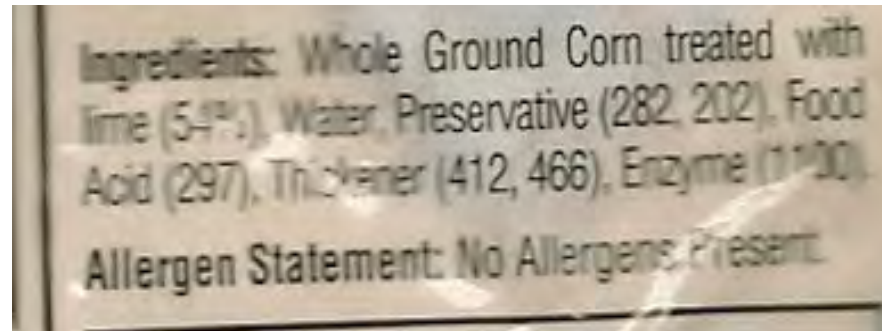
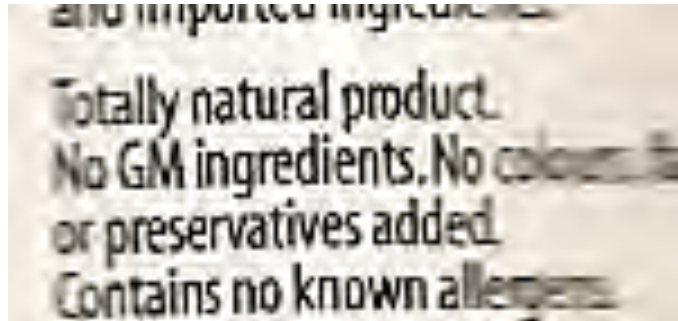
- Label has “Contains 10% Milk Fat”
- A consumer may incorrectly assume this is an Allergen Summary Statement and that this product contains milk as the only allergen
- A consumer may not realise that this also contains egg

Summary Statement

- Summary statement is in a different font to the ingredient listing
- Does this make it more or less easy to find?



Example



- Labels with “Contains no known allergens” & “No Allergens Present”
- What does this mean? This is a difficult claim to support as many people are allergic to foods outside those required for mandatory labelling
- Supporting this claim could be difficult



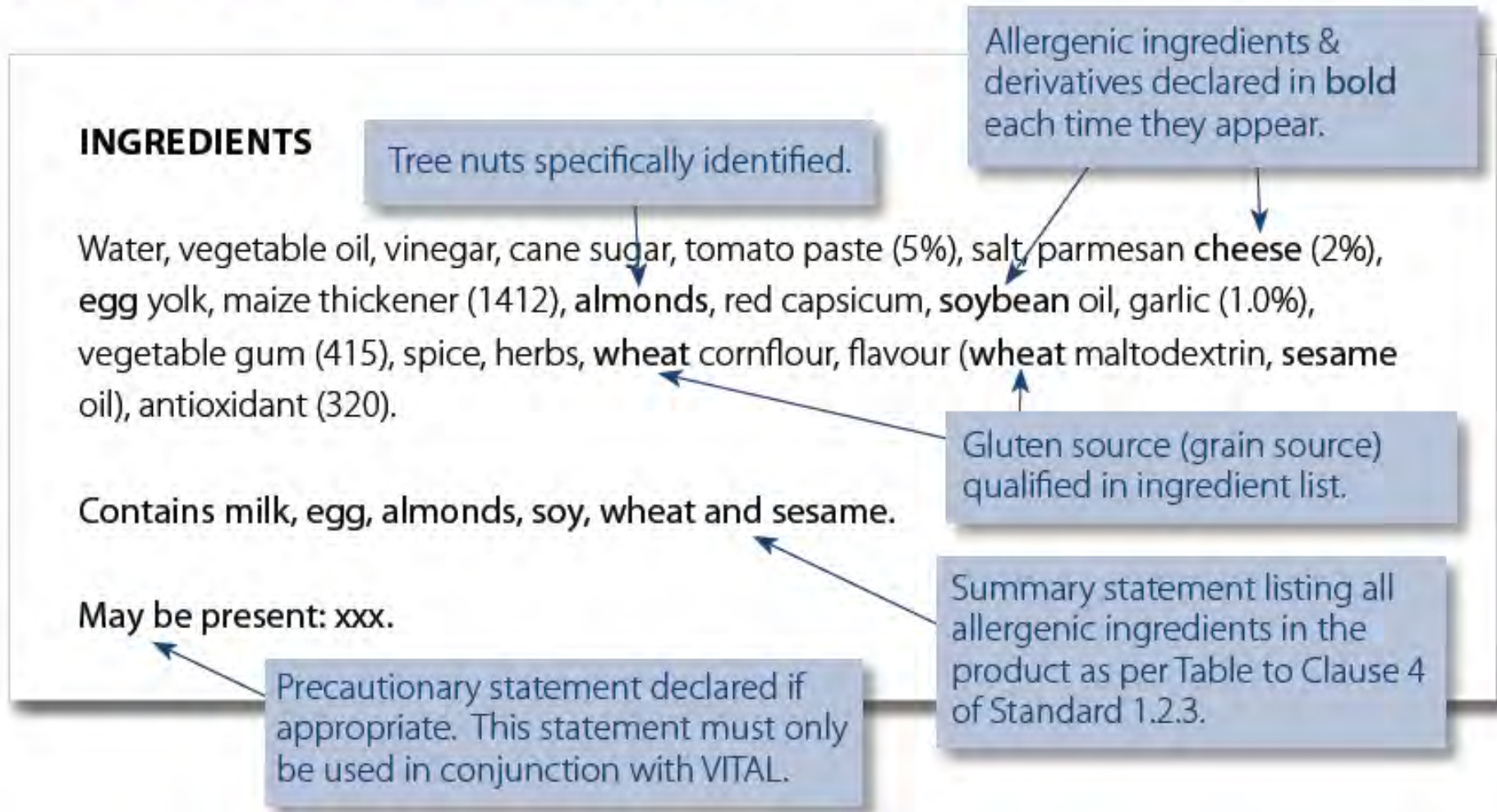
informing the food industry

Grade	SUMMARY STATEMENT Recommendation in The Guide	Comment
A+	Use “contains” for the summary statement	Excellent
B-	Font size of summary statement equal to ingredient listing	Declining adherence
B+	“Tree nuts” declared in preference to “nuts”	Keep improving





RECOMMENDED LABELLING FORMAT EXAMPLE.





informing the food industry

Results – Precautionary Statements

“The precautionary [labelling] statement [“May be present”] is used in conjunction with VITAL and ONLY when the cross contact allergen is at action level 2 on the VITAL action level grid.”

- May be present is the only precautionary statement which should be used in conjunction with Voluntary Incidental Trace Allergen Labelling (VITAL)



informing the food industry

Results – Precautionary Statements

“The precautionary statement is declared as “May be present: xxx”, where “xxx” lists each of the cross contact allergens present at VITAL Action Level 2”

- Incidence of precautionary statements on all labels – 48% in 2005 and 47% in 2009
- “May contain traces of...” was most commonly used in both 2005 (35%) and 2009 (38%) of all precautionary statements
- In 2009, 11 products (or 7%) used the “May be present” VITAL precautionary labelling statement

	2005		2009
May contain traces of	35%	May contain traces of	38%
May contain	9%	May contain	6%
Manufactured on equipment that also processes products containing	8%	Manufactured on equipment that also processes products containing	6%
Manufactured on equipment that processes products containing added	6%	Manufactured on equipment that processes products containing added	1%
Manufactured on equipment that processes products containing	5%	Manufactured on equipment that processes products containing	8%
May be present	0%	May be present	7%
Manufactured on equipment that processes	5%	Manufactured on equipment that processes	3%
Made on a production line that also processes products containing	5%	Made on a production line that also processes products containing	3%
Made on equipment that also processes	3%	Made on equipment that also processes	1%
Contains traces of	2%	Contains traces of	1%



informing the food industry

Results – Precautionary Statements

“This statement [May be present] is placed below the summary statement on a separate line in bold.”

- “May be present” statement placed as recommended in The Guide 82% of the time
- Other precautionary statements showed increasing compliance to the recommendations – from 93% (2005) to 96%.(2009)
- Recommendation for “bolding” also showed increased compliance to The Guide - 43% (2005) to 58% (2009).



informing the food industry

Grade	PRECAUTIONARY STATEMENT Recommendation in The Guide	Comment
D+	Use of VITAL	Improving
B+	In bold, on a separate line	Improving
B-	Use same font size as ingredient list	Declining adherence





informing the food industry

Allergen Claims

- Decreased from 17% (2005) to 9% (2009)
- Majority of claims are for wheat-free or gluten-free
- Further investigation required



informing the food industry

Recommendations

- Repeat this survey in four years (2013), monitoring partnership with FSANZ
- Investigate why The Guide is not more widely adopted
- Scoping exercise for developing Australian Standard for allergen labelling
- Provide increased guidance to address major issues (eg. font size)
- Convene a working group to formally address issue of gluten-free criteria
- Compile a list of “consumer-friendly” terms for allergen-derived ingredients (Allergen Bureau website)



informing the food industry

Summary

- As an industry we are striving to provide a consistent allergen labelling approach to facilitate consumer information
- Compliance to the industry Guide varies dependant on the attribute
- There is work to be done by industry and by the Allergen Bureau
- Feedback from FSANZ is:
 - Industry has been proactive in addressing labelling needs
 - Collaborative effort
 - No regulatory outcomes required
 - Label monitoring partnership approach



informing the food industry

Data can be used by Food Industry

How did industry declare “soybeans” in precautionary and summary statements in 2009?

Precautionary statements:

- 20% (12) - "soybean" or "soy and soybean"
- 80% (48) – “soy”

Allergen Summary statements:

- 25% (17) - "soybean" or "soy and soybean“
- 75 % (50) - "soy"



informing the food industry

Thank you

VITAL Co-ordinator
vital@allergenbureau.net

Allergen Bureau Management
management@allergenbureau.net

Information
info@allergenbureau.net

