

Allergen Labelling Survey 2009 & VITAL Review 2010

August 2010

Allergen Bureau Breakfast Meeting

Sydney



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Agenda

Background

“The Guide”

Recommended Labelling Format

Results

Recommendations

VITAL Review

Allergen Labelling Review Survey 2009

Background

- Allergen Labelling Survey Australia only
- 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

Allergen Labelling Review Survey 2009

Background

- 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?



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FOOD INDUSTRY GUIDE TO ALLERGEN MANAGEMENT and LABELLING



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

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.

INGREDIENTS

Tree nuts specifically identified.

Allergenic ingredients & derivatives declared in bold each time they appear.

Water, vegetable oil, vinegar, cane sugar, tomato paste (5%), salt, parmesan **cheese** (2%), egg yolk, maize thickener (1412), **almonds**, red capsicum, **soybean** oil, garlic (1.0%), vegetable gum (415), spice, herbs, **wheat** cornflour, flavour (**wheat** maltodextrin, **sesame** oil), antioxidant (320).

Gluten source (grain source) qualified in ingredient list.

Contains milk, egg, **almonds**, **soy**, **wheat** and **sesame**.

Summary statement listing all allergenic ingredients in the product as per Table to Clause 4 of Standard 1.2.3.

May be present: xxx.

Precautionary statement declared if appropriate. This statement must only be used in conjunction with VITAL.

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.

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





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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

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

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)

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

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”

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.



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Grade

**INGREDIENT LIST
Recommendation in The Guide**

Comment

D

Allergens listed in bold

Not widely adopted

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%.

RECOMMENDED LABELLING FORMAT EXAMPLE.

INGREDIENTS

Tree nuts specifically identified.

Water, vegetable oil, vinegar, cane sugar, tomato paste (5%), salt, **parmesan cheese** (2%), egg yolk, maize thickener (1412), **almonds**, red capsicum, **soybean** oil, garlic (1.0%), vegetable gum (415), spice, herbs, **wheat** cornflour, flavour (**wheat** maltodextrin, **sesame** oil), antioxidant (320).

Contains milk, egg, almonds, soy, wheat and sesame.

May be present: xxx.

Precautionary statement declared if appropriate. This statement must only be used in conjunction with VITAL.

Allergenic ingredients & derivatives declared in **bold** each time they appear.

Gluten source (grain source) qualified in ingredient list.

Summary statement listing all allergenic ingredients in the product as per Table to Clause 4 of Standard 1.2.3.



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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

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

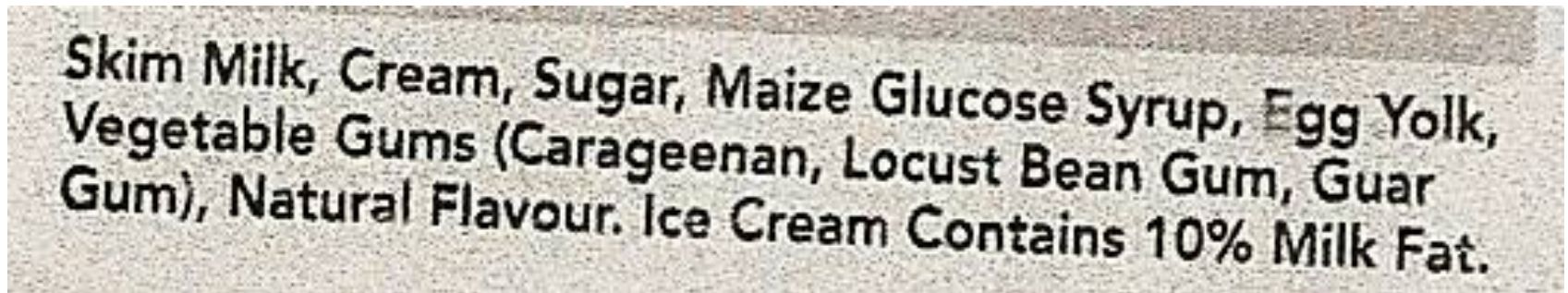
WHOLEGRAIN CEREALS (60%) (CORN, WHEAT, OATS), VEGETABLE OIL, RICE, SUGAR, MALTODEXTRIN, MILK POWDER, SALT, ONION POWDER, YEAST EXTRACT, CHEESE POWDER, NATURAL FLAVOURS, PARSLEY FLAKES, FOOD ACIDS (330, 270)

Contains Gluten

Contains Milk or Milk Products

Contains Soybeans or Soybean Products

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.

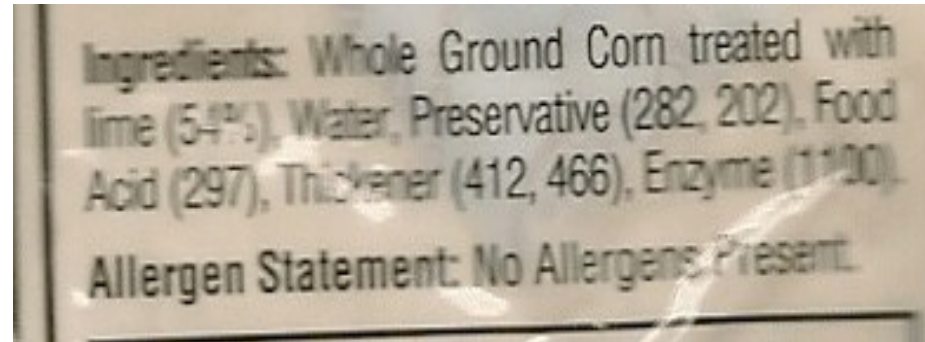
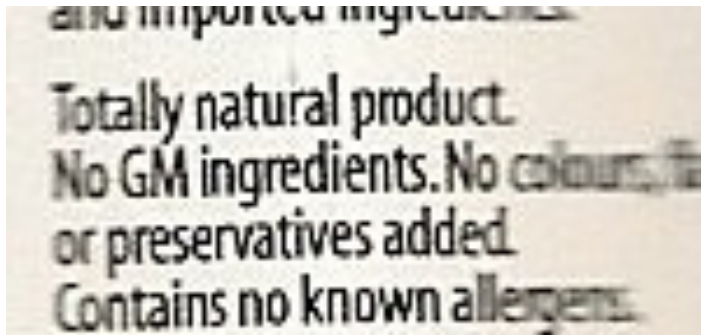
- Label has “Contains 10% Milk Fat”
- A consumer may incorrectly assume this is an Allergen Summary Statement and that this product contains milk as the only allergen
- A consumer may not realise that this also contains egg

Summary Statement

- Summary statement is in a different font to the ingredient listing
- Does this make it more or less easy to find? Does it stand out? Or could it be missed?



Example



- Labels with “Contains no known allergens” & “No Allergens Present”
- What does this mean? Many people are allergic to foods outside those required for mandatory labelling
- Supporting this claim could be difficult, very absolute statement



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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

RECOMMENDED LABELLING FORMAT EXAMPLE.

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Tree nuts specifically identified.

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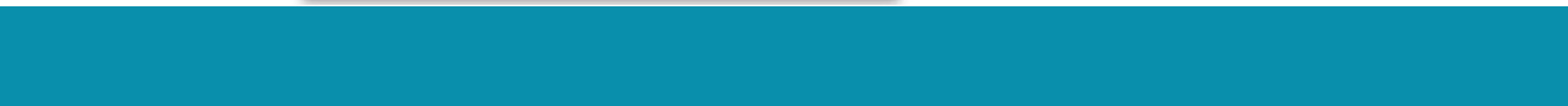
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Results – Precautionary Statements

“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

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” the precautionary statement also showed increased compliance to The Guide - 43% (2005) to 58% (2009).

Allergen Claims

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

Labelling 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 (Stakeholder Meeting)
- Compile a list of “consumer-friendly” terms for allergen-derived ingredients on the Allergen Bureau website - (Completed)



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VITAL Review in 2010

- FSANZ Feedback
- VITAL overall Review including Scientific Review
- International Interest
- Consumer Communication Strategy
- Expanding Training Providers

FSANZ

- Food industry is addressing allergen labelling and precautionary labelling well
- Satisfied that there is a consistent and collaborative industry approach
- No justification for a regulatory outcome at this stage



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VITAL Review 2010

- Review of the VITAL Procedure, Grid and Decision Tree
- Revise VITAL tools (calculator, FAQs, worked examples) and other supporting information
 - training documents will be aligned with the amendments to the VITAL as a result of the review

VITAL Scientific Review

- Aim: Completion of scientific review of the VITAL Grid including an article suitable for peer review and publishing in suitable journal
- Draft has been developed
- Feedback received from Dr Steve Taylor & team, Director, Food Allergy Research & Resource Program)
- Convene scientific Expert Panel

International Interest

- Requests to speak in UK, Canada, USA and provide further information about the rollout of VITAL
 - BRC & FDF presentations in UK
- Emails requesting assistance with VITAL & interest in becoming training providers from Europe, Asia, South Africa
- Over 40% website traffic from outside Australia and New Zealand



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Consumer Communication Strategy

- Advise consumers of our message:

“Don’t eat products which contain a precautionary statement with an allergen to which you are sensitive”
- Strategy in draft form and will be released and rolled out in the coming months



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Training Providers

- Expanding eligible Allergen Bureau-endorsed VITAL training providers
- Two-stage approval process, close to completion
- Watch our website and eNews for information about new trainers
- Increase options for trainees (training formats, timetable)

Summary – Allergen Labelling

- 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 more work to be done by industry and by the Allergen Bureau
- Feedback from FSANZ :
 - Industry has been proactive in addressing labelling needs
 - Collaborative effort
 - No regulatory outcomes required
 - Label monitoring partnership approach



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Summary – VITAL Review

- Reviewing and Updating VITAL Tools and support information & most importantly the Calculator
- Scientific Review underway
- Scientific Expert Panel to assist with review and ongoing support
- International interest, so how do protect VITAL to ensure ongoing sustainability
- Consumer Communication Strategy
- Further Training Providers will become available shortly



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Thank you

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