

## VITAL Q & A for Consumers

*This document is intended to provide general information only for educative and illustrative purposes, and is not professional or technical advice. Seek professional advice about its contents to determine whether, and the extent to which, it applies or does not apply to your own circumstances. The document is provided on the basis that no liability of any kind, including in relation to negligence, will be accepted by the Allergen Bureau in relation to, or any use of, its contents in any circumstances.*

**Q What allergens are manufacturers required to label on their products?**

A The Australia New Zealand Food Standards Code (ANZFSC) requires food to be labelled with certain allergens (gluten, crustacea, egg, fish, milk, tree nuts, sesame seeds, peanuts and soybeans) if they are included in the product formulation as ingredients, part of a compound ingredient, food additive or processing aid at any level in the food. The declaration of cross contact allergens which may unintentionally included in a food (eg contamination) is not required by the ANZFSC. This means that the “May contain...” or “Made in a facility...” statements are voluntary declarations.

**Q What are cross contact allergens and how do they get into foods?**

A Cross contact allergens are those allergens that are unintentionally included in a product - they are not part of the product formulation. Cross contact allergens may enter a product at any point of the supply chain from “paddock to plate” such as through shared harvesting, storage or processing equipment. It is possible for an ingredient or food to become incorporated into another product through the use of shared mixing bowls, pipework or other processing equipment. The VITAL process encourages manufacturers to reduce cross contact wherever possible through careful sourcing of ingredients and review of production methods and schedules.

**Q What are precautionary statements?**

A Precautionary statements, allergen advisory statements or “trace” statements are the information provided on product packaging to convey the risk of the unintentional inclusion of an allergen through cross contact. Examples of precautionary statements currently used on food packaging include “May contain..”, “Contains traces of...” etc.

**Q What is VITAL?**

A VITAL (Voluntary Incidental Trace Allergen Labelling) is a tool for use by the food industry to assist with declaring the possible presence of cross contact allergens in their products. Where a VITAL assessment identifies the requirement to declare a cross contact allergen on the label, the precautionary statement “May be present:..” will be used.

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**Q What is the benefit of VITAL for food allergic consumers?**

**A** Prior to VITAL there was limited guidance for food manufacturers to assist them with when and how to label cross contact allergens. This has resulted in precautionary statements being used inconsistently and sometimes inappropriately on food products. The choices of foods for consumers with a food allergy can be further reduced where precautionary statements are used unnecessarily. Alarming, there is evidence that some consumers with food allergies are ignoring precautionary statements and eating foods which could cause an adverse reaction. Manufacturers that use VITAL assess their foods in a consistent manner. VITAL encourages the elimination of cross contact allergens and where a precautionary statement is required, only the “May be present:..” statement can be used. As VITAL is adopted across food industry, it will benefit consumers by reducing the amount of precautionary statements on food and where a precautionary statement is required, ensuring that the information is conveyed to consumers in a consistent manner. It is hoped that food manufacturers using the VITAL tool will be able to clearly communicate to consumers which foods are safe and which should be avoided.

**Q What type of foods does VITAL cover?**

**A** VITAL was designed for processed foods. Processed foods are those that usually have more than one ingredient and have a processing step (eg canning, cooking, baking, milling) prior to packaging. This would include products such as cake mixes, breads, breakfast cereals, canned soups, ice-creams and many other foods. VITAL does not cover non-processed foods such as fresh fruit and vegetables. Foods which have been formulated for infants (ie less than 12 months old) cannot be assessed using VITAL.

**Q If VITAL is voluntary, how do I know which food manufacturers are using VITAL?**

**A** There is no logo or other marking on product labelling to advise which products have been assessed using VITAL. Some companies are alerting consumers about their use of VITAL via their websites. It is important to remember that if you see the “May be present:..” statement used for an allergen to which you are sensitive, then you should avoid the food. If you have any concerns about the allergen status of a product, contact the food manufacturer.

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**Q My favourite food now has been assessed by VITAL and now has a “May Be Present:...” statement – I have always eaten this food safely in the past – is it still OK to eat?**

A The manufacturer has used VITAL to identify that there is a significant risk of the allergen being present and the food would be unsafe to eat if you are sensitive to the allergen listed in the “May be present:...” statement. The allergen status of a product can change over time due to changes in product formulation, production conditions and changes in ingredient sourcing etc. It is important to always check the label and take note when changes take place. Even if a food has been safely consumed in the past, changes can take place which may mean it is no longer safe to eat. If you have any questions or concerns about the allergen status of a product, contact the manufacturer.

**Q Where can I get further information about VITAL?**

A Information about VITAL can be freely downloaded from the Allergen Bureau website <http://www.vitalallergen.com>.

**Q Who developed and maintains VITAL?**

A VITAL was developed by a project team under the Allergen Forum of the Australian Food and Grocery Council (AFGC). VITAL is now managed by the Allergen Bureau.

**Q Is VITAL mandatory?**

A VITAL is an initiative of the Australian Food and Grocery Council and its adoption is voluntary. However, uniform adoption of VITAL across the industry will assist in providing consistent information about cross contact allergens in foods. Food retailers are increasingly expecting manufacturers to utilize VITAL for risk assessment of cross contact allergens on their pre-packaged private label branded products.

**Q Are there penalties for manufacturers who claim to use VITAL, but haven’t done it or haven’t done it correctly?**

A VITAL is a voluntary program and is not a legal requirement. It is the manufacturer’s responsibility to adequately assess and control risk and to label appropriately - VITAL can be used as a tool to assist in this process. The majority of food manufacturers have certified food safety programs which are regularly audited for compliance by independent parties. VITAL would be assessed during these audits.



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**Q Does Food Standards Australia New Zealand (FSANZ) endorse the use of VITAL?**

A FSANZ was consulted and provided input during the development of VITAL. FSANZ develops Food Standards but does not enforce or undertake interpretation of food law and accordingly it is not in a position to endorse VITAL.

**Q Is there an education program to make allergic consumers aware of the terms?**

A A consumer education program will be developed in 2009 in consultation with key stakeholders.