



Upravljanje z alergeni v proizvodnji živil / Food Allergen Management for Food Manufacturers

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Content of the Presentation

- The European Food and Drink Industry
- The role and membership of FoodDrinkEurope
- The Regulatory Environment
- Food Allergen Management
- FoodDrinkEurope Activity
- Challenges

Who we are

Role: Represent the food and drink Manufactures at the EU Level

- **National federations (26, including 3 observers)**

E.g.: FDF (UK), ANIA (FR), BLL (DE), PFPZ (PL),
FederAlimentare (IT), etc.

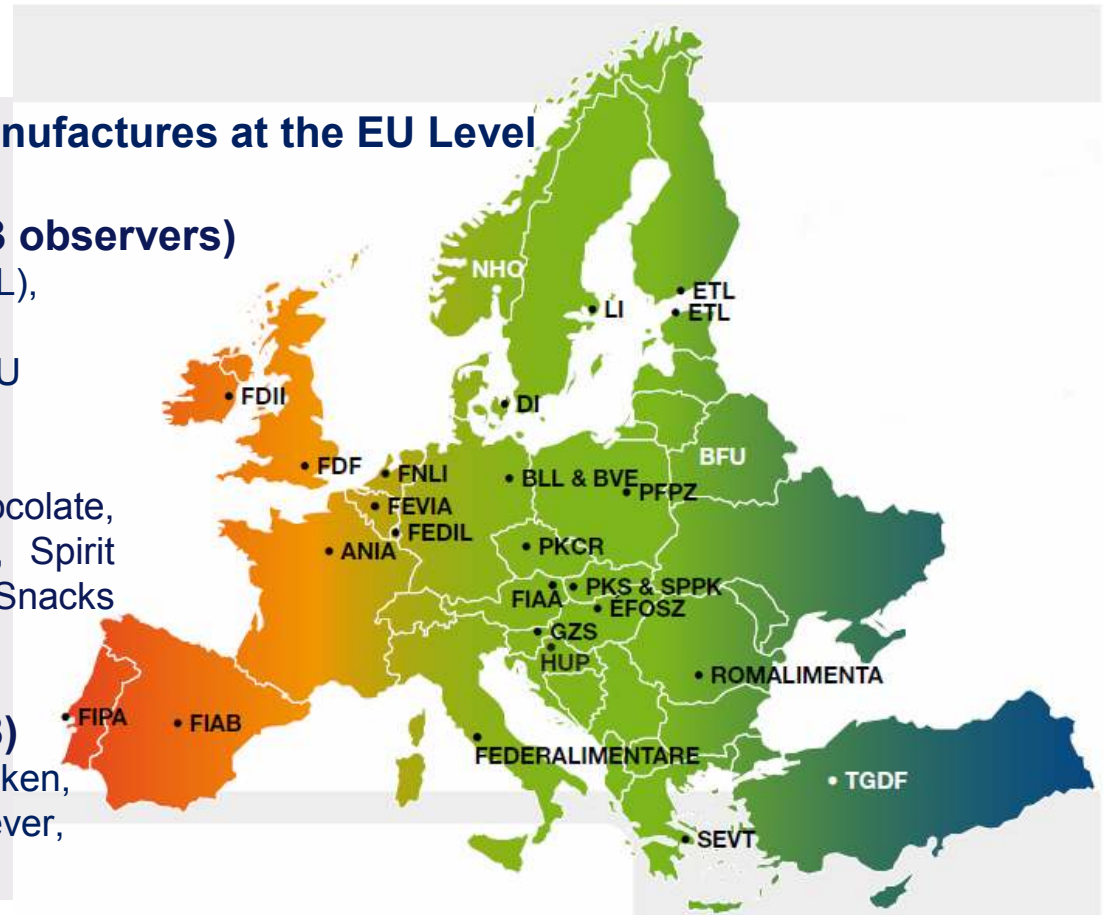
Observers: Turkey (TGDF), Norway (NHO), BFU

- **European sector associations (25)**

E.g.: Breakfast cereals (CEEREAL), Chocolate, Biscuits and Confectionary (CAOBISCO), Spirit drinks (CEPS), Dairy products (EDA), Snacks (ESA), Soft drinks (UNESDA), etc.

- **Major food and drink companies (18)**

E.g.: Barilla, Coca-Cola, Cargill, Danone, Heineken, Kellogg, Mars, Nestlé, PepsiCo, Ülker, Unilever, etc.



The EU food and drink industry in 2011

Turnover

€1,017 billion

(↑6.8% compared to 2010)

Largest manufacturing sector
in the EU (14.9%)

Employment

4.25 million people

(Stable compared to 2010)

Leading employer in the EU manufacturing
sector (15.0%)

SMEs

49.3% of food and drink turnover

63.4% of food and drink employment

External Trade

Exports €76.2 billion

(↑16.6% compared to 2010)

Imports €63.0 billion

(↑13.5% compared to 2010)

Trade balance €13.2 billion

Net exporter of food and drink products

Number of companies¹

287,000

Fragmented industry

Value added

(% of EU GVA²)

1.9%

Consumption

(% of household
expenditure)

14.5%

EU market share of global exports

16.5% (20.5% in 2002)

Shrinking share in world markets

R&D

(% of food and drink industry turnover)

0.53%³

Sources: Eurostat, UN COMTRADE, OECD

(1) 2010 data

(2) For definition, see page 25

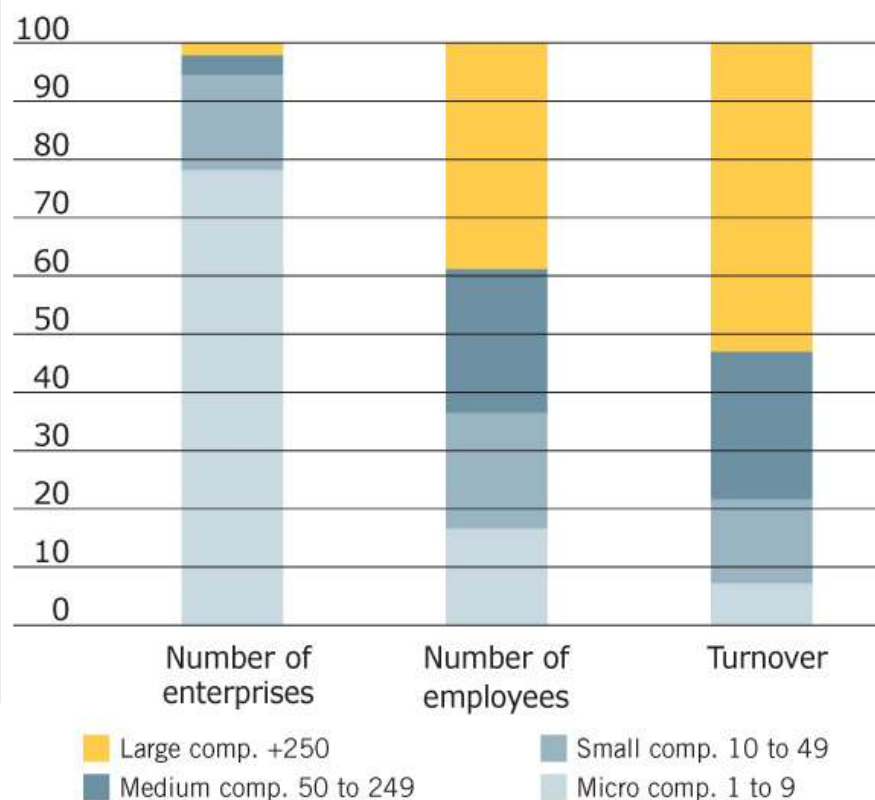
(3) 2009 data

A Diverse Sector

SMEs comprise:

- 99.1% of F&D comp.
- 49.3% of F&D turnover
- 63.4% of the F&D work force

Breakdown of number of enterprises, turnover and value added by size of companies (%)

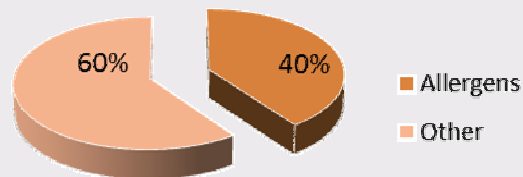


Source: Eurostat, SBS size class, 2003 data

Why focus on allergens?

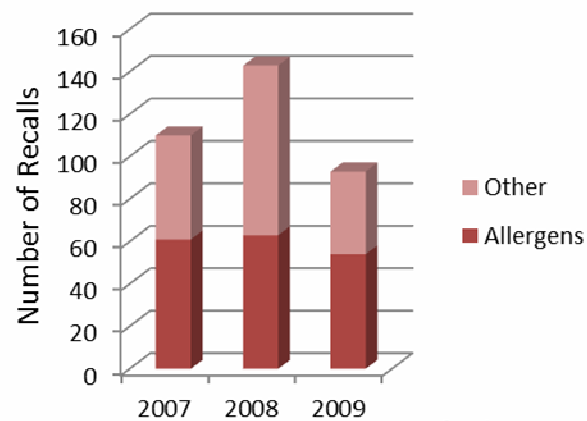
- Across UK, US and Australia, approx 40% of food industry recalls are related to allergens (cross contamination etc)

Food Standards Australia
Recalls 2009



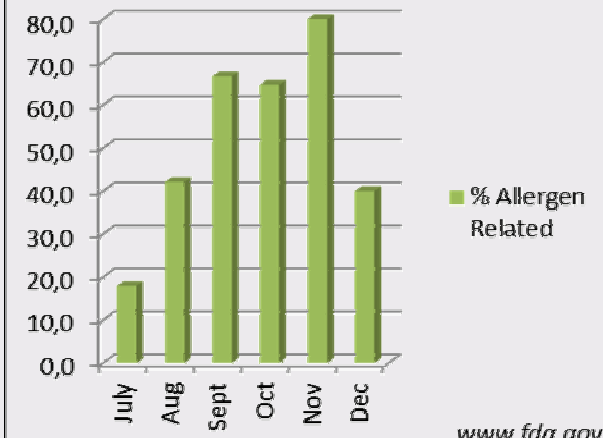
www.foodstandards.gov.au

Food Standards Agency (UK)
Recalls 2007-2009



www.food.gov.co.uk

FDA Recalls & Withdrawals
July - Dec 2009



www.fda.gov

Why Food Allergen Management?

- Food allergy is of global and growing importance to public health
- 17 million consumers in Europe suffer from food allergies
- Affects consumers quality of life (mainly children)
- Makes demands on health service resources
- Consumer health protection lies with avoidance of products containing the food to which they are allergic
- Minimising risk from allergenic foods is a shared responsibility across stakeholders
- Healthcare professionals providing relevant diagnoses and dietary advice
- Food chain operators providing accurate risk communication advice
- Governments providing a protective consistent regulatory framework
- Patients actively avoiding potential risks

Critical Allergens of Public Health Importance

- Although >160 foods have been identified as able to provoke IgE mediated allergic reactions, only a small number are responsible for the majority of the food allergy public health burden
- Critical allergenic foods which require public health protective risk management measures can now be objectively identified using explicit scientific criteria
- Public health measures pertinent to local needs and prioritised allergen risk management
- Consideration of an allergenic food's potency, severity and prevalence, evaluated together in a weight of - evidence approach

Best Practice HACCP based Risk Management

- Effective risk management of food allergens requires careful consideration of allergen presence
 - Intentional from the recipe
 - Unintentional through unavoidable cross contamination
- Integrated into good manufacturing practices (GMP), across all stages of food production from 'farm to fork', for each individual food operator site
- Primary food processing
 - Seed, planting, harvesting, storage, transport
- Secondary food processing
 - Raw materials, handling, storage, measuring, mixing, cooking, cooling, re-work, packaging, transport

Best Practice HACCP - based Risk Management - Key Elements

- HACCP analysis – are critical allergens present in the food product and/or in the handling environment?
 - Intentional presence is identified and declared
 - Likelihood and quantitative extent of unintentional (cross contact) presence is assessed
- Risk management – how to control and assure finished product allergen status?
 - Segregation – storage, handling, packing - through cleaning, scheduling and planning
 - Capability of quantitative control below action levels – monitoring, validation, verification
- Risk communication – how to identify product allergen status?
 - Product identification and traceability
 - Clear differentiation of intentional and unintentional allergen presence

A Quick look at the Regulatory Environment

- Background: A more complex global supply chain
- No global consistency in regulations
- As a consequence: no global consistency in QA due diligence

Allergens Management

What resources are already available to help the food industry and the allergic consumer?

Guidance

- Many guides have been published
 - By National Agencies
 - By Industry
 - By Consumer groups
- Many training guides are available
 - Publicly
 - Within individual Manufacturers
 - Within individual Sectors

Need for a Consolidated Guide on Allergens

- To capture the good practices
- To provide up to date information on risk assessment, Good Manufacturing Practices and analytical protocols
- To make it usable and applicable to all types of food manufacturers (large Companies and SME's)
- To use as a vehicle for discussion and collaboration at European and Member States levels

FoodDrinkEurope Activity

- Formed an ad hoc working group
- Comprised of many sectors across the Food Industry
- Multi-functional expertise covering:
 - Risk assessment
 - Good manufacturing Practices
 - Methods of analysis
 - Allergic consumer perspectives
 - Allergenicity

FoodDrinkEurope Allergen Guidance

- Primary sources
 - UK FSA Guidance on Allergen Management and Consumer Information
 - UK FDF Dried Foods Industry Guidance on Allergen Control and Risk Management
 - Swedish Food Sector Guidelines for management and labelling of food products with reference to Allergy and Intolerance
 - Federalimentare Guidelines on the Labelling of Allergens (Version 2, 6 November 2009)
 - EuroPrevall
 - MoniQA

FoodDrinkEurope Allergen Guidance

- Structure and approach
 - Risk Management
 - Pre-requisites (personal hygiene, GMP, rework...)
 - HACCP
 - Risk Assessment
 - Value Chain Considerations
 - Step by step approach from supplier management all the way down to the final product and it's documentation.
 - Cleaning
 - Validation & Verification
 - Technical & Detailed Reference Information
 - This may include Sector specific information

Challenges (1)

- The food industry is well used and experienced in the use of HACCP and risk assessment techniques and tools
- These tools are able to provide maximum values when quantitative analysis can be carried out (examples: microbiology, pesticides, purity criteria, ...) and as such protect consumers.
- This also applies to allergens...
 - ...so how do we get to a position that balances food and consumer safety with the ability and possibility to use quantitative risk assessment...
 - ...and how can we get recognition of this position across all parties?

Challenges (2)

- Does a zero tolerance approach help this discussion and how can we have agree with all relevant parties?
 - Zero tolerance level today, is not zero tolerance level tomorrow
 - But as the detection levels go down, where is the public health relevance going?
 - Are we really helping the allergic consumer with this?
- **Thresholds are needed**

To find more:

[http://www.fooddrinkeurope.eu/uploads/publications
documents/FINAL Allergen A4 web.pdf](http://www.fooddrinkeurope.eu/uploads/publications/documents/FINAL_Allergen_A4_web.pdf)