



♣ CANADIAN SPICE ASSOCIATION

# Allergen UPDATE II

## Regulatory Perspective

*CFIA*

*Consumer perspective*

*Anaphylaxis Canada*

# Regulatory Perspective – Labelling of Food Allergens

- The Food and Drug Regulations B.01.010.1(2) require that sources of the food allergen or gluten must be declared either in:
  - The list of ingredients
  - In a “contains” statement
- Scope: Does not apply to a food allergen or gluten that is present in a prepackaged product as a result of cross-contamination. B.01.010.1(3)

## Regulatory Perspective – Inspections

- Inspection focus has been on undeclared allergens as a result of product formulations- not testing
- 76 recalls from August 2012 to Feb. 2015 for undeclared mustard allergen
  - 59 domestic
  - 17 imported
  - 35 class I
  - 18 class II
  - 23 class III

# Food Allergen Precautionary Statements (PL)

- Voluntary statements regarding the possible inadvertent presence of an allergen in the food.
- To be used when, despite all reasonable measures, the inadvertent presence of allergens in food is unavoidable.
- Precautionary statements are not a substitute for Good Manufacturing Practices.
- There is no regulatory requirement for, or prohibition of, precautionary labelling, however statements must be truthful and not misleading (FDA and CPLA).

# Consumer perspective

- About **2.5 million Canadians** have self reported at least one food allergy , representing 7% of the population
- There is no cure for food allergy; strict avoidance key to staying safe:
- A small amount can trigger a reaction
- Reading food labels , asking “What’s in the food?”

**Food labels are an allergic consumer’s life-line**

## YET....the anaphylaxis community wants

- Fewer products with precautionary statements
- Wider choice of safe products
- Standards for the food industry
- Ongoing education of consumer

*“Only 0 is good enough”* for acceptance of specific thresholds



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# Allergen UPDATE III

## Thresholds

# Thresholds

- Undeclared allergens should not be present
- If present , recall based on risk assessment:

Risk assessments are based:

- on amount of allergen in the product – in ppm
- reference amount- qty of the food usually eaten by an individual at one sitting
- level of exposure to an allergen which will trigger a reaction in an allergic individual



## Thresholds cont`d

Thresholds are based:

- Individual allergen
- on data which is very limited
- LOAEL ( lowest observed adverse effect level)
- No internationally agreed safe threshold levels
- No clear definition of what is trace vs gross contamination

## Thresholds cont`d

- FARRP (Food Allergy research and Resource Program )
- Vital- ( Voluntary Incidental Trace Allergen Labelling )
- Eliciting dose ( ED) – trigger point at which 99% of allergic individuals will not trigger an allergic reaction



# Allergen UPDATE IV

## Testing

# Correction - Food Recall Warning - Rescindment of Food Recall Warnings (Allergen)

- laboratory testing indicated that cumin contained undeclared almond
- additional testing has confirmed that the original laboratory results were false positives
- Cross-reactivity with mahleb
- Significant monetary and reputational cost for the manufacturer

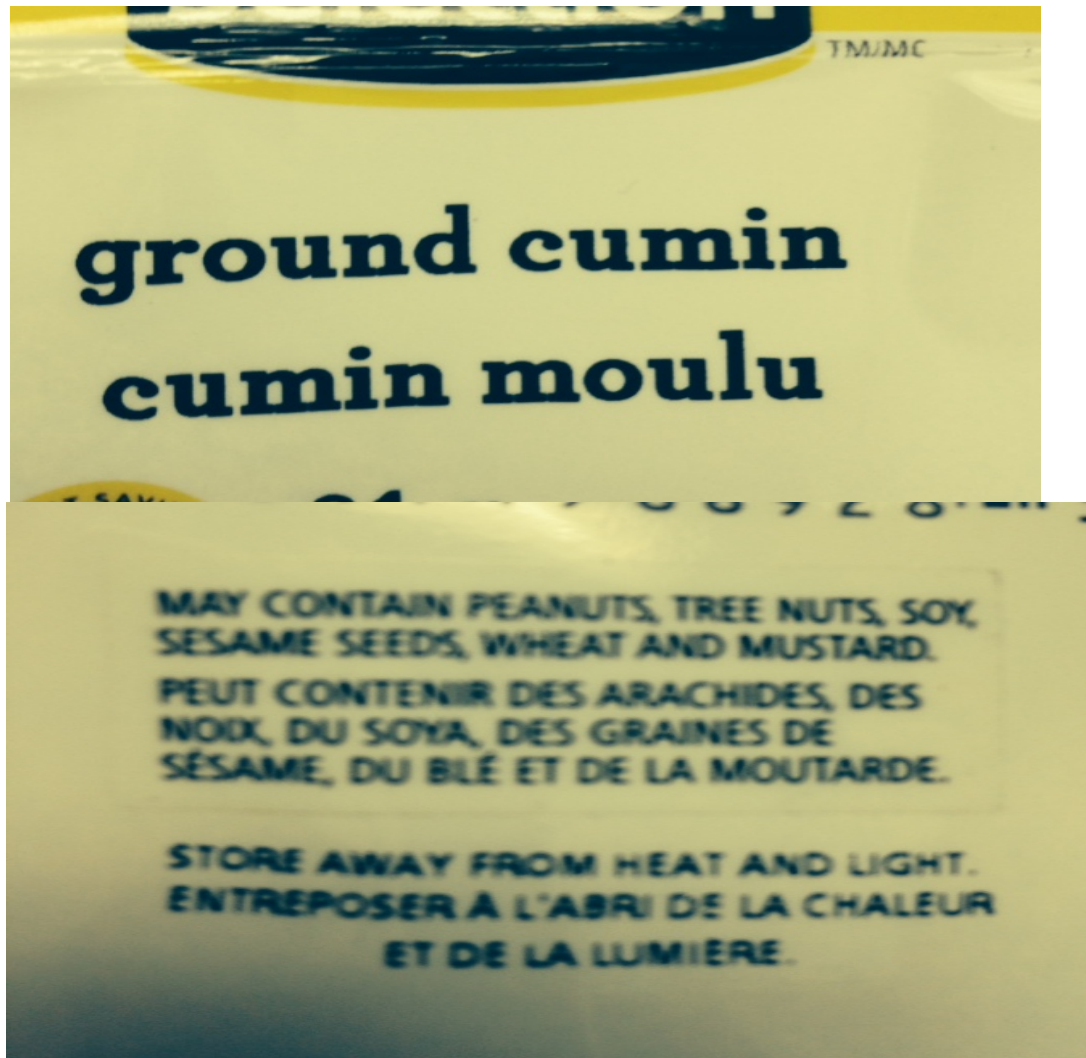
## Testing cont'd

- Test methods:
  - Elisa- quantitative within a standard range
    - Some issues with cross-reactivity
  - PCR ( polymerase chain reaction)- qualitative-DNA
- LOD
- Sampling protocol

# The way Forward for the spice industry

- Supply chain improvement
  - How realistic to change agricultural methods in source countries?
- Increased testing-
  - Expensive, time consuming and possibility of error
- Individual risk assessment-
  - carries risk for the supplier
- Industry-consumer-govt agreement on maximum threshold levels for each allergen that are science based –

# The way forward for the spice industry



Is the spice industry  
able to 'contain'  
the use of  
'may contain'  
?