

ALLERGEN MANAGEMENT GUIDELINES FOR FOOD MANUFACTURERS

Executive summary

Food allergy affects over 3 million Canadians, impacting 1-in-2 households in this country and is a food safety issue that must be addressed by all food manufacturers through preventive control measures — like any other hazard.

Unlike other hazards, however, when unintended allergens are controlled, this can represent a **potential opportunity** for a business. When unintended allergens are not controlled, this poses a real risk to the business.

The following overview describes the current state of allergen management and the use of precautionary allergen labelling (e.g. May contain statements) in the Canadian food industry — consider why this is important and **why it should become a priority for your organization**.

Current state

1 Mandatory recalls

FACT: Over the past decade in Canada, **undeclared food allergens** have been the main cause of food recalls — representing more than 30% of the total number of recalls per year.

IMPACT ON MANUFACTURERS: Getting it wrong has serious safety and cost implications.

REALITY CHECK: Not having an effective allergen control plan (ACP) in place can be costly to manufacturers — in recall costs and lost (potential) sales — and dangerous for consumers with food allergy. Costs associated with food recalls can quickly climb into

the millions of dollars even when dealing with relatively low-impact and low-volume recalls.



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2 Proliferation in the use of precautionary allergen labelling

FACT: A significant proliferation in the use of precautionary allergen labelling (PAL) has led to consumer confusion, lack of trust in the accuracy of food labels and for some consumers, ignoring these statements – deeming them to be meaningless.

IMPACT ON MANUFACTURERS: Diminished effectiveness of PAL as a risk communication tool.

REALITY CHECK: This prolific use of PAL by manufacturers has diminished the effectiveness of the messaging for those who rely on them and has negatively impacted the messaging when real risks actually exist. Defaulting to PAL, without conducting a proper risk assessment, diminishes the importance of risk communication across the entire industry.

3 Sales opportunity

FACT: Since half of Canadian households support someone with food allergy, PAL directly impacts what gets purchased and brought home – it affects the shopping basket content at the grocery store. Consumers are aware of the risks, and they read labels attentively. In a recent poll of Canadians who purchase food products on behalf of individuals in their community living with food allergy (e.g. schools, childcare, sports teams etc..) 91% of consumers indicated that PAL statements are a consideration in their purchasing decision.

As a food manufacturer, are you doing everything you can to encourage consumers to purchase your products? Are your products making it from shelf to basket?



IMPACT ON MANUFACTURERS: Getting it right can favourably affect the bottom line.

REALITY CHECK: The management and control of allergens is more than a food safety imperative – it represents a business opportunity in the form of directly influencing sales at the point of purchase.



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4 The challenge

FACT: There are many guidance documents available that explain how to manage allergens, but there is a shortage of available information on how to manage precautionary allergen labelling.

IMPACT ON MANUFACTURERS: It can be overwhelming for some manufacturers to determine how best to manage PAL, while for others, they can be left guessing whether or not what they are currently doing is sufficient and adequate.

REALITY CHECK: To help address this issue, a unique multi-stakeholder collaboration was initiated between Food Allergy Canada, Laval University's Food Risk Analysis, and Regulatory Excellence Platform (PARERA) and Maple Leaf Foods, along with a broad representation from Canada's food industry to develop **Allergen Management Guidelines for Food Manufacturers**. A core set of recommendations was developed to help all Canadian food manufacturers – large and small – better identify and understand the

impact of effective allergen control measures on their business and their ability to provide safe food options for consumers.

By adopting the guidance materials, they will more easily focus on the implementation of a robust allergen management action plan within their respective facilities.



5 The opportunity

- Actively control allergen presence
- Reduce the number of potential recalls
- Reduce the need and use of PAL
- Increase potential sales
- Restore PAL as a value-added, effective risk communication tool

Please see the **Allergen Management Guidelines for Food Manufacturers** for a more in-depth look into the recommended allergen management practices and how it may relate and be applicable to your business' action plan.

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