

# ALLERGEN MANAGEMENT FOR IMPORTERS PROJECT

## The issue

Susceptibility to allergens and rates of anaphylaxis are increasing in Australia. Undeclared allergens in food are a significant risk factor for anaphylaxis which often requires medical attention and may be life threatening.

In 2016, undeclared allergens accounted for 46% of all food recalls nationally and was the most common reason for conducting a recall.

Importers of recalled foods are often small to medium sized companies that import specialty foods or ingredients.

The Australian Department of Agriculture and Water Resources (DAWR) has responsibility for regulating import and export of certain foods into and out of Australia.

DAWR has access to two databases relating to imported food;

- **Agriculture Import Management System** - for food inspected under Imported Food Inspection Scheme (“high risk” and 5% of “surveillance” foods).
- **Integrated Cargo System (ICS)** - for imported goods, managed by Department of Immigration and Border Protection (Customs)

Information from both databases was provided to Biosecurity & Food Safety (BFS) in a project that reviewed compliance and awareness of importers.

The purpose of the project was to prevent or mitigate risks to human health through undeclared allergens in imported food products.

## What we did

The Food Incident Response & Complaints Unit (FIRC) investigated 117 importers and evaluated their understanding of allergen declaration requirements, their preparedness for a food recall and their food safety culture.

The project focused on businesses that had;

- not recently or previously been inspected
- failed an imported food inspection (Failed Food Notice) through pathogen detection or breaches of Maximum Residue Limits at the border, or
- recently been the subject of a complaint lodged with the Food Authority relating to imported food.

If the business was still found to be operating, an inspection was completed using a dedicated

checklist, which provided data on the business’ awareness of allergens and recall readiness. If the business was not able to be inspected the reasons for non-inspection were recorded.

This assisted in assessing the usefulness of the DAWR data.

In addition, a food safety culture questionnaire, developed from templates supplied by Food Standards Australia New Zealand (FSANZ) was used by BFS officers to obtain a benchmark assessment of the importer’s ‘food safety culture’.

A strong food safety culture comes from all staff within a business understanding the importance of making safe food and committing to doing whatever it takes, every time.

## What we found

While over 80% of businesses reported asking suppliers about ingredients and checking allergen labelling only:

- 56% could produce evidence that they had checked the allergen labelling of their products was correct, and
- 64% could produce evidence they had checked that ingredient labelling of their products was correct.



- 40% of importers did not have a recall plan in place at the time or could not produce a recall plan upon request. Each of these businesses now have a recall plan in place.

The food safety culture questionnaire indicated that 90% of businesses knew what their general obligations were.

While the questionnaire was detailed, it was not easily applied across the diverse range of businesses. Importers vary significantly in size and complexity, from businesses operating out of their home on a one-off or intermittent basis, to large international distributors. Therefore, it is unsurprising that 42 businesses (36%) were not able to be inspected.

## The outcome

Where appropriate, business details were added to the Food Authority database and the Manufacturer and Wholesaler Inspection Program (MWIP). One business was required to obtain a licence.

The project resulted in;

- 75 businesses being advised or reminded of requirements to

declare allergens in accordance with the Food Standards Code.

- The review of 45 recall plans.
- 30 businesses that had no recall system in place adopting a simple and effective recall action plan.
- 12 businesses who were previously unaware of requirements to declare allergens being informed of what is required.
- Six businesses being added to the MWIP and subject to regulatory inspection.
- 18 businesses being added to the Food Authority database and subject to improved regulatory oversight.
- A benchmark assessment of 75 businesses.

## Next steps

The following recommendations were made:

- Review current policy to monitor compliance of food importers and update to include use of DAWR data where appropriate.
- Discussion with DAWR and Customs regarding distributing allergen and recall information to importers and customs agents.
- Ensure future policy to monitor compliance of food importers includes guidance on how to minimise risk to business and consumers by keeping simple records of allergen and ingredient labelling checks.
- Transition the Allergen Management for Importers project into a surveillance plan which is reviewed annually.
- In partnership with FSANZ, review the food safety culture questionnaire to account for variation in business size and structure.

About the NSW Food Authority: The NSW Food Authority is the government organisation that helps ensure NSW food is safe and correctly labelled. It works with consumers, industry and other government organisations to minimise food poisoning by providing information about and regulating the safe production, storage, transport, promotion and preparation of food.

Note: This information is a general summary and cannot cover all situations. Food businesses are required to comply with all of the provisions of the Food Standards Code and the *Food Act 2003* (NSW).



Department of  
Primary Industries

6 Avenue of the Americas, Newington NSW 2127  
PO Box 6682, Silverwater NSW 1811  
T 1300 552 406  
[contact@foodauthority.nsw.gov.au](mailto:contact@foodauthority.nsw.gov.au)  
ABN 47 080 404 416

More resources at [foodauthority.nsw.gov.au](http://foodauthority.nsw.gov.au)



nswfoodauthority



nswfoodauth