

## Importer and allergen awareness

### Food importer compliance project 2017-2018

#### Purpose

A number of food importers are small to medium sized companies that import specialty foods or ingredients. Some importers were not aware of allergen risks or their food recall obligations. The latter may increase the risk further by prolonging the time a food remains in the market. This project aimed to develop a surveillance plan to monitor food importer compliance with the Food Standards Code allergen and food recall requirements

This surveillance plan improves management of the risk of susceptible consumers being exposed to life threatening reactions. It reduces the risk of allergens not being correctly identified on a product label or the recalls of such products not being actioned in a timely manner.

#### 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 immediate medical attention and may be life threatening.

In 2016, undeclared allergens in food accounted for 33 of 72 (46%) food recalls nationally. In 2017 this increased to 34 of

69 (49%) national food recalls and remains the single most common reason that a recall is conducted by a business.

In 2016/17 DPI Biosecurity & Food Safety:

- evaluated the use of DAWR data in monitoring compliance of food importers;
- investigated 117 importers (10 % of DAWR data) and evaluated their understanding of allergen declaration requirements, their preparedness for a food recall and their food safety culture; and
- recommended that a strategy for importer allergen management is transitioned into a surveillance plan.

#### What we did

Following on from the earlier work in 2016-17, Department of Primary Industries (DPI) Biosecurity & Food Safety (BFS) Compliance officers evaluated data relating to 205 importers:

- 198 were identified using data provided by DAWR;
- 3 from food recall follow-up activity;
- 4 from complaint investigations; and
- 1 from DAWR imported food inspections.

Fifty-nine (59) of these businesses were assessed for allergen and food recall awareness as many had previously been evaluated for compliance.

A standard inspection checklist was used to record data regarding the business's awareness of allergens and recall readiness. This assisted in assessing the usefulness of the DAWR data.

## What we found

There was an improvement in businesses asking suppliers about ingredients and checking allergen labelling (89%, compared with 80% in 2016/17). In addition, 63% (up from 56% in 2016/17) of businesses could produce evidence that they had checked that the allergen labelling of their products was correct.

However, only 63% of importers could produce evidence that they had checked that the ingredient labelling of their products was correct and 40% of importers surveyed 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 observation in 2016/17 that importers vary significantly in size and complexity, from owner operated businesses operating out of their home on a one-off or intermittent basis, to large international distributors was confirmed.

## Outcomes

Where appropriate, business details were added to the BFS Compliance database and the [Manufacturer and Wholesaler Inspection Program \(MWIP\)](#).

The project resulted in 59 businesses being advised or reminded of requirements to declare allergens in accordance with the

Australian New Zealand Food Standards Code.

The recall plans of 30 importers were reviewed with a further 27 importers identified as not having a recall plan in place. All businesses required to have a recall plan now have a recall plan in place and have an improved capacity to respond to allergen risk.

Ten businesses that were previously unaware of requirements to declare allergens are now aware of what is required and the specific allergens that must be declared on a product label. One Improvement Notice was issued.

## Next steps

A detailed surveillance plan for food importers for 2018-2019 has been prepared and will be implemented to continue to monitor compliance for this industry sector.

## More information

For further information visit:  
<https://www.foodauthority.nsw.gov.au>

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