



australasian society of clinical immunology and allergy

Review of Food Standards Code chapters 3 and 4 - Food Safety Management requirements

Food Standards Australia New Zealand
submissions@foodstandards.gov.au

Submission made by the Australasian Society of Clinical Immunology and Allergy (ASCIA) Dietitian's Committee on behalf of ASCIA

Kathy Beck
Chair of the ASCIA Dietitian's Committee
Email: k.beck1@uq.edu.au
Ph: 0400 310 200

Submission authorised by Ms Jill Smith CEO, ASCIA
Email: jill@allergy.org.au
Ph: 0425216402
Mail: PO Box 450 Balgowlah NSW 2093

Submission

Foodborne illness is a major issue in Australia and New Zealand. However there is also an increasing burden in our society related to food allergic individuals requiring access to safe food in all levels of food service. We therefore request that the revision of the Food Standards Code clearly and concisely addresses the Foods Safety Management requirements related to provision of foods to food allergic individuals in addition to microbial hazards.

The incidence of severe food allergy has increased rapidly since the food safety standards were developed in 2000. In Australia, food allergy is now relatively common, affecting 1 in 10 infants.¹ There has been an increase in more serious clinical presentations of food allergy,^{2,3} and increasing persistence of food allergy into secondary school and beyond.^{4,5} Anaphylaxis is the most severe form of food allergy, and can result in death.

Food allergy has a significant impact on quality of life, including being able to safely consume meals outside the home. The Victorian Anaphylaxis Notification Scheme indicated a significant problem, with 22% of all anaphylaxis events recorded being the result of consuming an unpackaged food from a food service, for the period November 2018 to May 2019. While no other jurisdictions have mandatory anaphylaxis notification systems, this picture is likely to be reflected across the country. Of most concern are the reports of deaths in these situations, and there have been several coronial inquests relating to food anaphylaxis deaths in Australia over the past decade.⁶

Food services of all descriptions require clear and concise guidelines and comprehensive training related to allergen management and provision of safe foods to food allergic individuals. Food safety supervisors should be required in each jurisdiction and be responsible for the implementation of appropriate food allergen management practices. Food safety supervisors require adequate training to achieve this and nationally standardised training should be implemented and mandated.

The Federally funded National Allergy Strategy launched “All about Allergens” online training in July 2017. This course provides free, standardised training accessible to all individuals working in food service and this course would be an ideal course to mandate as the required training for food safety supervisors as it is accessible to all. Prior to this launch, food allergen management training was inadequate and did not meet the demands of those working in foodservice. However, inconsistencies for training in food allergen management in food services exist across jurisdictions, and assessment of food allergen safety and management are not included in the remit of food safety officers. Furthermore, there are no mandated guidelines governing the duty of care regarding allergen management in food services catering to vulnerable populations, such as those in hospitals, aged care, long day care and other residential settings. The National Allergy Strategy and Queensland Health released a Best Practice Guideline in 2018 for food allergen management in hospitals; however, this is not a mandatory requirement and does not apply to other states.

Summary

The ASCIA dietitian’s committee, on behalf of ASCIA, recommends that FSANZ address the issue of best practice food allergen management in food service in the Food Safety standards code. We acknowledge that this is slightly different to food borne illness which is currently the major focus of chapters 3 and 4. However, it is not addressed elsewhere and it should be, given the increasing prevalence of food allergy in Australia and New Zealand. By definition, if a food allergic consumer has declared their food allergy and reacts to a food provided by a food business, that food is unsafe.

Food standards should therefore address allergen management in the food supply chain, and best practice management of food allergens at all levels of food service. Requirements for appropriate food allergen management training and mechanisms to assess adherence to these standards should also be included.

References

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