



# Current Approaches of Food Allergen Management in The Arab Region

## -Gaps and opportunities-

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GF  RSS



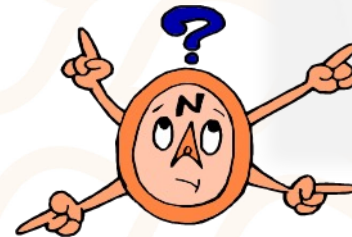
# Objective of this talk

- 
- **Raise up the importance of Allergen management and the key elements that needs to be considered;**
  - **Share Moroccan experience in implementing guidelines and tools in the food safety regulatory system to mitigate risks for consumers;**
  - **Highlight gaps and opportunities that need to be developed in Arab countries.**



# Outline of the presentation

- 1. Food Allergen management principles**
  - Why is it important?
  - The key elements
  - International guidelines and tools
- 2. How it can be applied to mitigate the risk of exposure**
- 3. Example of application in Arab region:**
  - Moroccan experience
- 4. Gaps and challenges in Arab countries;**
- 5. Opportunities and key element that need consideration in Arab countries.**



# Why is it important?

food safety issue affecting an estimation of 220 million people worldwide

Serious public health and economic issue

Have emerged as a major public and personal health burden



More than 170 foods have been reported to cause allergy reactions

## Food allergy

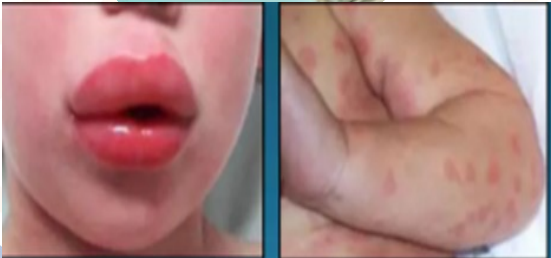
8 major food allergens responsible for most of the serious food allergy reactions :

milk, egg, peanut, tree nuts, wheat, soy, fish and crustacean shellfish.

The list varies among countries

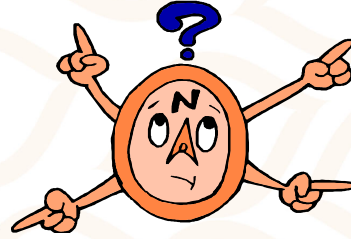
It is becoming increasingly common as a result of growing urbanization and changes in diet and lifestyle.

Additional major allergens to be identified in the future



# Why is it important?

“Excuse Me, Is this Allergen Free?”



- There is no cure for food allergies
- Strict avoidance is the only way to prevent an allergic reaction.



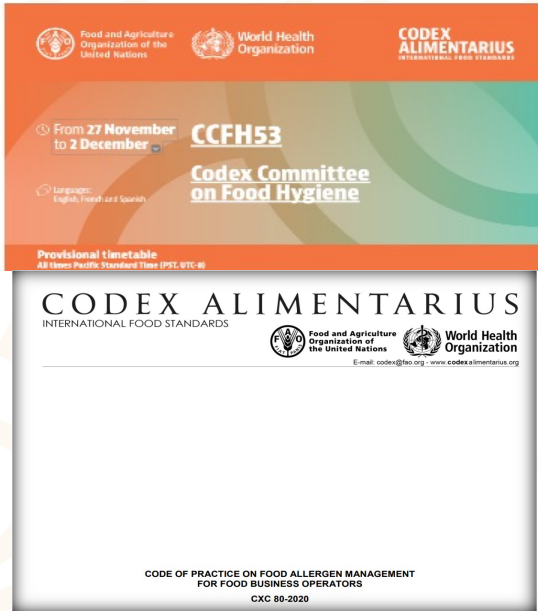
**Allergens are ongoing food safety concern notably for consumers, Competent authorities and food business operators**

# International management principles

CCFH



**CODE OF PRACTICE ON FOOD ALLERGEN MANAGEMENT FOR FOOD BUSINESS OPERATORS CXC 80-2020 Adopted in 2020.**



**Provide guidance to food business operators and competent authorities on managing allergens in food production, including controls to prevent allergen cross-contact.**

**Management principals throughout the supply chain through GHPs and HACCP-based controls at appropriate stages in the food chain.**

**Focus on the awareness and responsibilities of all personnel involved in the food chain.**

**Allergens in food have been considered by the Codex on a number of occasions since 1993. There have been many works and scientific developments done notably by FAO and WHO in the understanding of food allergens and their identification and management.**

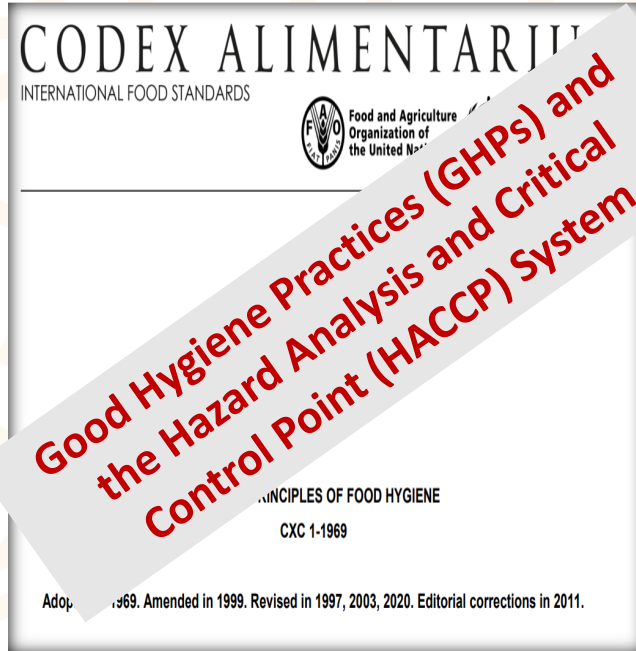


# International management principles

CCFH →

## General Principles of Food Hygiene (CXC 1-1969)

The control of allergens is mentioned also in the General Principles of Food Hygiene (GPFH) which has been recently.



**Responsibility of FBOs to provide safe food**

outlines the **general principles** that should be understood and followed by FBOs at all stages of the food chain and that provide a basis for competent authorities to oversee food safety and suitability.

FBOs need **to be aware of hazards** that may affect their food. FBOs need to understand the consequences of these hazards for consumer health and should ensure that they are **properly managed**.

# International management principles

CCFL/  
CCNFSDU



General Standard for the Labelling of Prepackaged Foods (CXs 1-1985) and the Standard for Foods for Special Dietary Use for Persons Intolerant to Gluten (CXs 118-1979).

Review of the provision relevant to allergen labelling as well as developing guidance on the use of precautionary allergen or advisory labelling (PAL).

4.2.2 The presence in any food or food ingredients obtained through biotechnology of an allergen transferred from any of the products listed in Section 4.2.1.4 shall be declared. When it is not possible to provide adequate information on the presence of an allergen through labelling, the food containing the allergen should not be marketed.

Establishment and update of the list of foods and ingredients known to cause hypersensitivity.



Food and Agriculture Organization of the United Nations  
 World Health Organization  
**CODEX ALIMENTARIUS**  
 INTERNATIONAL FOOD STANDARDS  
 15-19 May 2023  
 Gatineau (Ottawa) Canada  
**Codex Committee on Food Labelling**  
 COMMISSION DU CODEX ALIMENTARIUS  
 Organisation des Nations Unies pour l'alimentation et l'agriculture  
 Organisation mondiale de la Santé  
 Vale della Terme di Caracalla, 00153 Roma, Italia - Tel: (+39) 06 57051 - Courriel électronique: codex@fao.org - www.codexalimentarius.org  
 Point 5 de l'ordre du jour CX/FL 23/47/5  
 Mars 2023  
**PROGRAMME MIXTE FAO/OMS SUR LES NORMES ALIMENTAIRES**  
**COMITÉ DU CODEX SUR L'ÉTIQUETAGE DES DENRÉES ALIMENTAIRES**  
 Quarante-septième session  
 Gatineau, Québec, Canada  
 15-19 mai 2023  
**ÉTIQUETAGE DES ALLERGÈNES ALIMENTAIRES**  
 (Préparé par le Groupe de travail électronique présidé par l'Australie et coprésidé par le Royaume-Uni et les États-Unis d'Amérique)  
 Les membres du Codex et les observateurs qui souhaitent soumettre des commentaires sur les recommandations contenues dans ce document doivent le faire en suivant les instructions du document CL 2023/08/CXS-FL disponible sur la page web des Lettres circulaires du Codex : <https://www.fao.org/fao-who-codexalimentarius/resources/circular-letters/fr/>  
**INTRODUCTION**  
 1. Lors de la 45<sup>e</sup> session du Comité du Codex sur l'étiquetage des denrées alimentaires (CCFL45), le Comité est convenu de réviser et de clarifier les dispositions relatives à l'étiquetage des allergènes dans la Norme générale pour l'étiquetage des denrées alimentaires préemballées (CXs 1-1985) (NGEDAP) et d'élaborer des directives pour l'étiquetage de précaution des allergènes (EPA)<sup>1</sup>.  
 2. En approuvant ces nouveaux travaux, la Commission du Codex Alimentarius (la Commission) a noté que ces travaux sont liés aux travaux du Comité du Codex sur l'hygiène alimentaire (CCFH) sur la gestion des allergènes et que, par conséquent, une collaboration étroite entre le CCFL et le CCFH sur cette question est importante pour assurer la cohérence entre les deux textes<sup>2</sup>.  
 3. Le CCFL45 est également convenu de demander un avis scientifique à la FAO/OMS<sup>3</sup> concernant la liste des aliments et des ingrédients de la section 4.2.1.4 de la NGEDAP. Le CCFH a également demandé à la FAO/OMS de fournir un avis scientifique sur les niveaux seuls pour les allergènes prioritaires en relation avec le Code d'usages sur la gestion des allergènes alimentaires pour les exploitants du secteur alimentaire (CXc 00-2020).  
 4. En réponse à ces demandes d'avis scientifiques, une <http://www.fao.org/cx/cx7121en.pdf> Consultation spéciale mixte d'experts de la FAO/OMS sur l'évaluation des risques des allergènes alimentaires s'est réunie quatre fois et a publié des rapports complets pour les parties 1 et 2, et des rapports de synthèse et de conclusions pour les parties 3 et 4 (voir le tableau ci-dessous) :

Recommendation: The VPWG recommends that the Committee accept section 4.2.1.4 as proposed below and, upon review of an appropriate reference, include the scientific names for the specific tree nuts listed in Column 1.

4.2.1.4 The following foods and ingredients are known to trigger food allergy or coeliac disease and shall always be declared using the specified name in addition to or as part of the ingredient name<sup>1</sup>:

FOODS AND INGREDIENTS	SPECIFIED NAME
Cereals containing gluten <sup>2</sup>	'wheat'
- wheat and other <i>Triticum</i> species	'rye'
- rye and other <i>Secale</i> species	'barley'
barley and other <i>Hordeum</i> species and products thereof <sup>3</sup>	
Crustacea and products thereof	'crustaceal'
Eggs and products thereof	'egg'
Fish and products thereof	'fish'
Peanuts and products thereof	'peanut'
Milk and products thereof	'milk'
Sesame and products thereof	'sesame'
Specific tree nuts	
- Almond	'almond'
- Cashew	'cashew'
- Hazelnut	'hazelnut'
- Pecan	'pecan'
- Pistachio	'pistachio'
- Walnut	'walnut'
and products thereof	

<sup>1</sup>In accordance with Section 4.1.1 of the General Standard for the Labelling of Prepackaged Foods (CXs 1-1985), the ingredient declaration should specify the true nature of the food and be specific and not generic.  
<sup>2</sup>Includes spelt, Khorasan, and other specific cereals containing gluten that are species or hybridized strains under the genus names of *Triticum*, *Secale* and *Hordeum*. Specified names are to be used according to the associated genus.



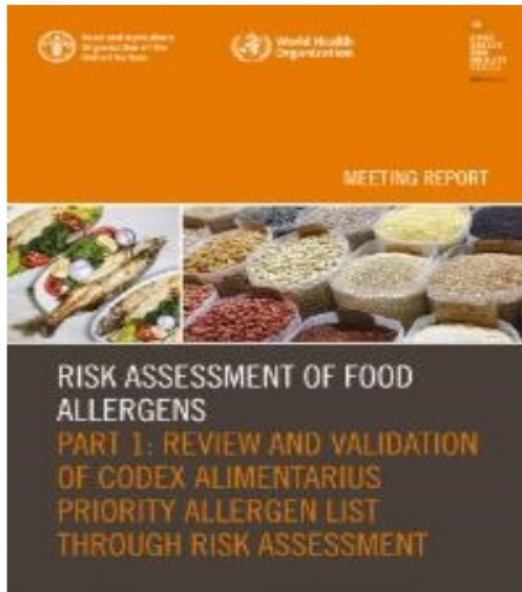


# International management principles

FAO/WHO:



**Risk assessment of food allergens**



Review and validation of Codex Alimentarius priority allergen list through risk assessment

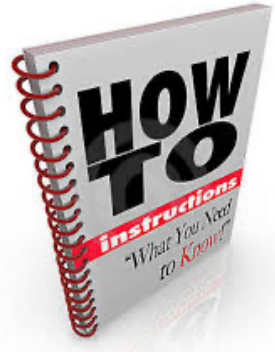
Review and establish threshold levels in foods for the priority allergens: meeting report



# The key elements

THE TOP 6 KEY ELEMENTS THAT SHOULD BE INCLUDED IN EVERY ALLERGEN MANAGEMENT PROGRAM

## Policies and procedures



Regulatory measures and national standard Product Labelling

Monitoring and control

Verification of allergen status in products



GHPs and HACCP Plan

Procedures and management programs

Cleaning and Sanitation Program to be in place

Validation and verification of cleaning procedures

Identification of critical points during cleaning

Monitor effects of changes in production process

Allergen Status of ingredients

Should be based on risk assessment conducted by FBOs

Producers

Distributors

Processors

Importers, exporters

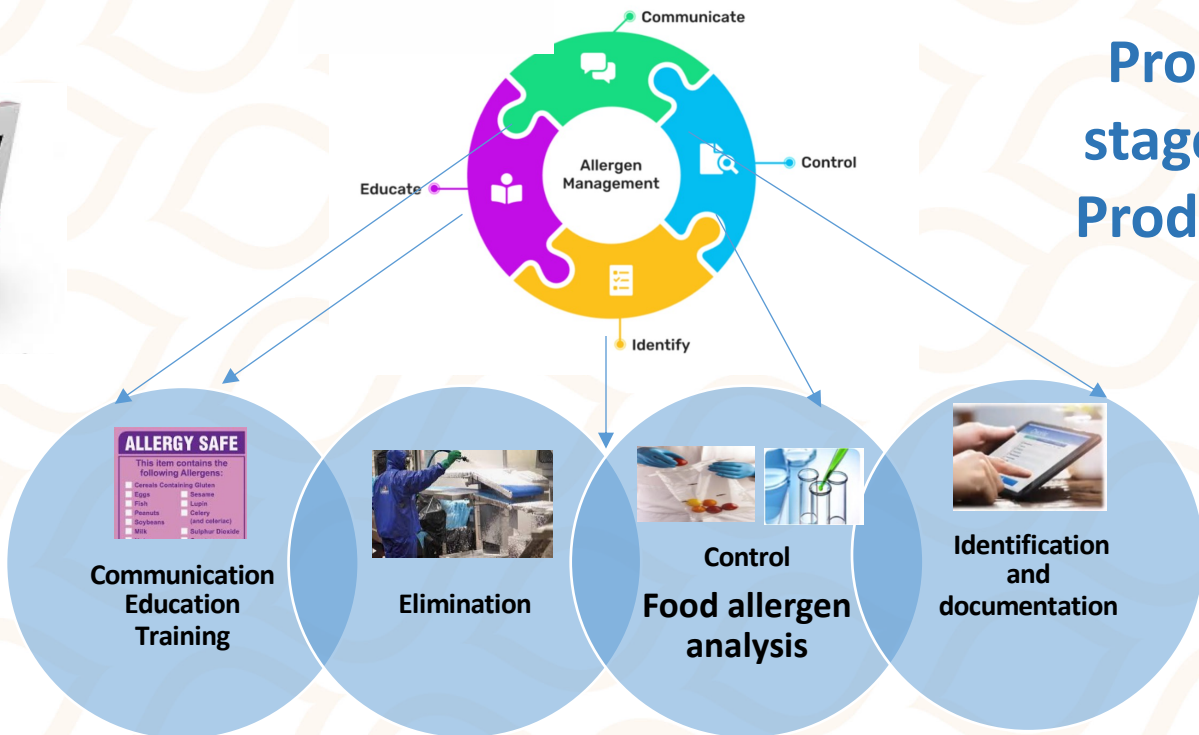
Retailers, transporters

Food service operators



# Policies, control and communication

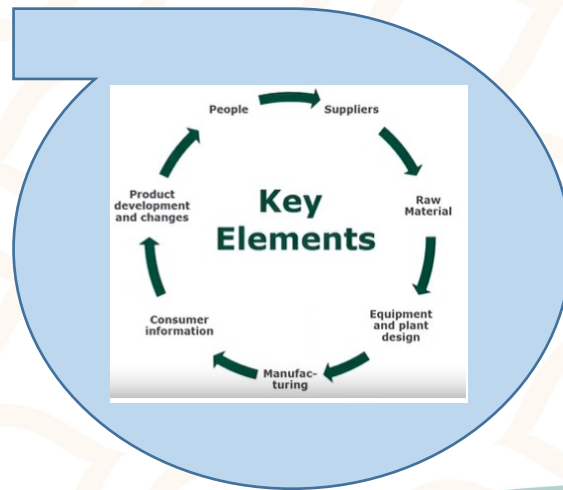
Proactive approach at different stages in food chain that concern Producers, competent authorities and consumers



**ALLERGY SAFE**

This item contains the following Allergens:

<input type="checkbox"/> Cereals Containing Gluten	<input type="checkbox"/> Soybeans
<input type="checkbox"/> Eggs	<input type="checkbox"/> Lupin
<input type="checkbox"/> Fish	<input type="checkbox"/> Dairy (and lactose)
<input type="checkbox"/> Nuts	<input type="checkbox"/> Sesame
<input type="checkbox"/> Milk	<input type="checkbox"/> Sulphur Dioxide



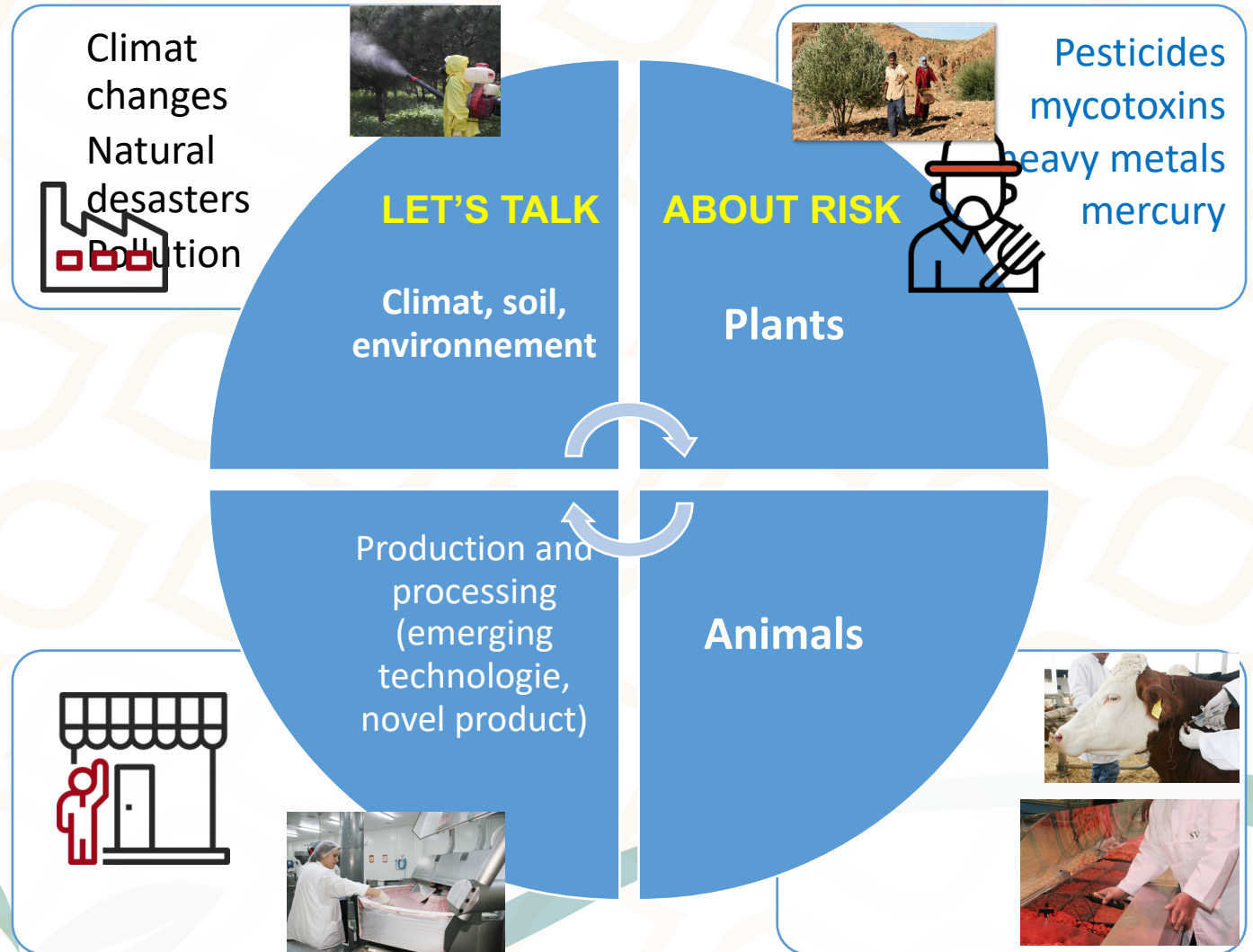
# Food allergen management in Arab countries

## Moroccan experience

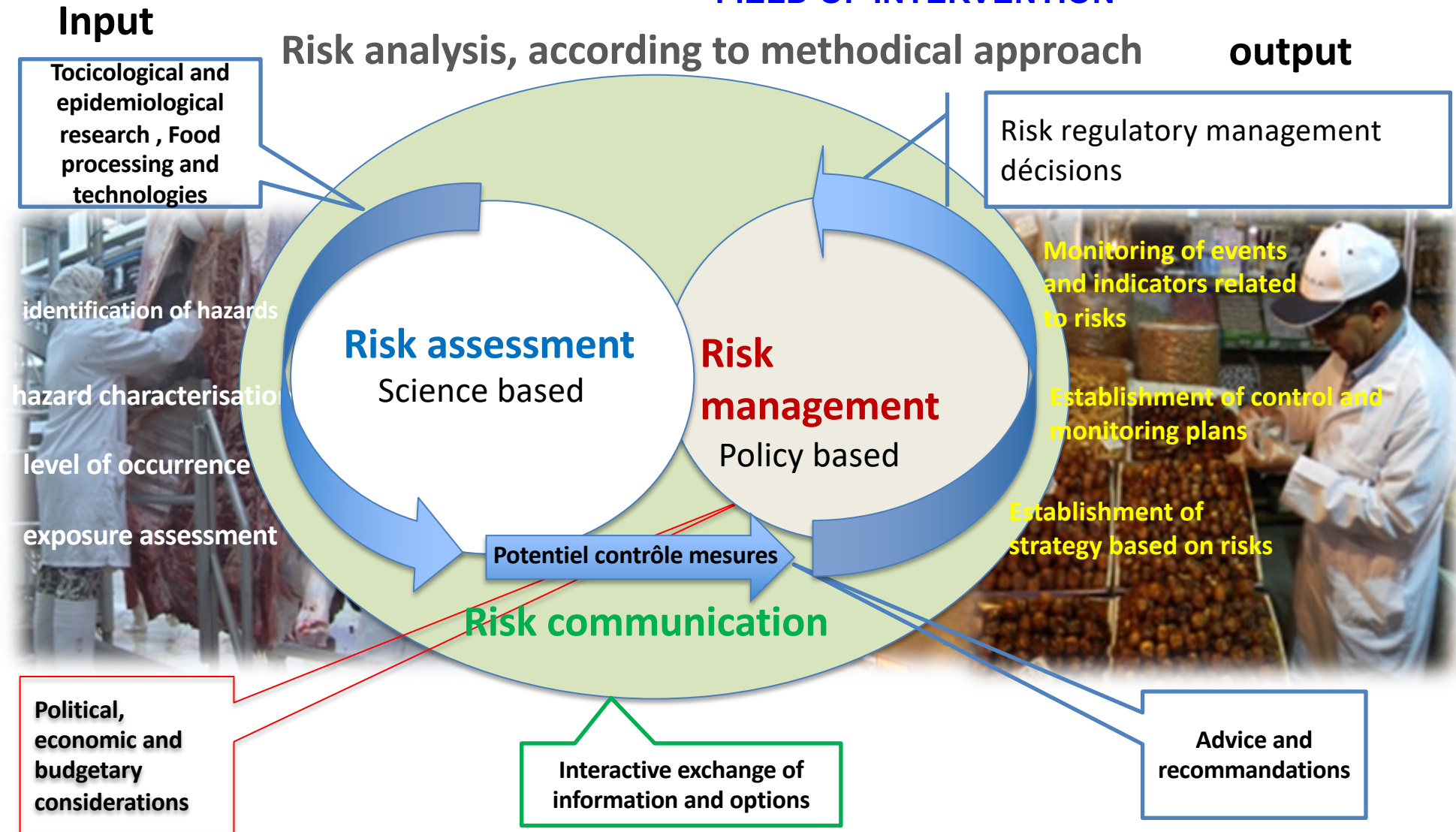


# Risk Analysis : Fundamental Pillars of Food Control System

To carry out its missions and meet its strategic objectives in term of good governance, ONSSA has set up its food safety system ensuring that the risk analysis process is followed when establishing strategic plans and regulatory measures



**RISK ASSESSMENT AT THE PRIORITIES OF ONSSA'S  
FIELD OF INTERVENTION**

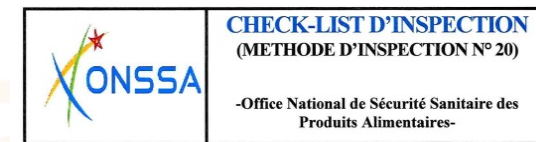
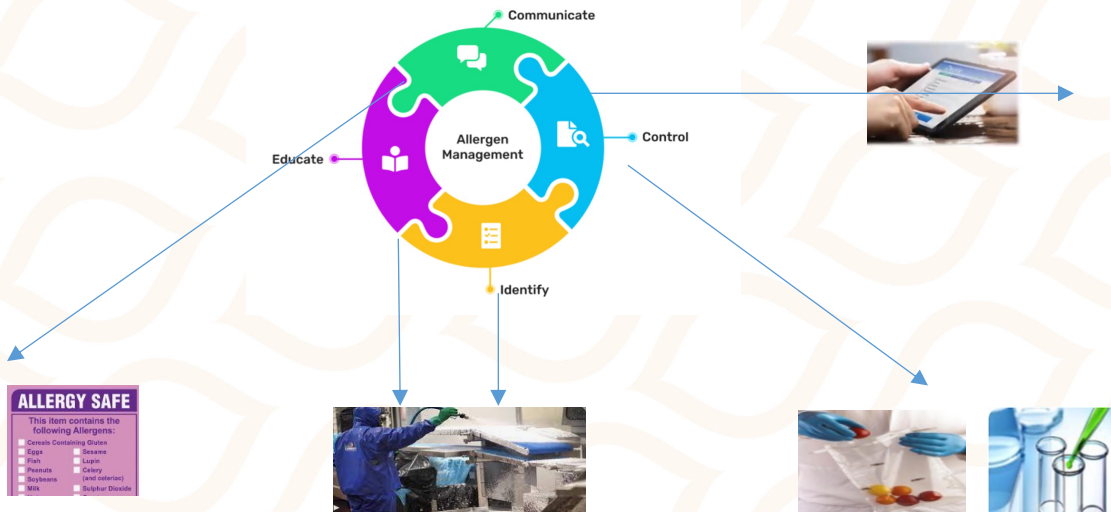


Risk assessment and monitoring systems are the main important steps that ONSSA try to improve and to develop. The aim is to anticipate hazards and effectively managing risks to improve the level of food safety management and control.

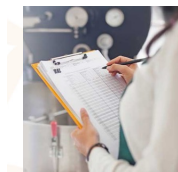
# Moroccan experience



## PROACTIVE APPROACH BASED ON THE APPLICATION OF GUIDELINES, POLICIES AND CONTROLE IN LINE WITH INTERNATIONAL PRINCIPALS



Checking that allergen management applied by the producers complies with current national regulations (during unit approval procedures and monitoring and control program)



Checking that labelling are in compliance with the regulation

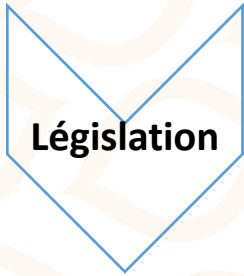


Make producers responsible for applying risk assessment to identify allergens in their process and HACCP principles to mitigate risks.



Strengthening capacities on analytical tools for the identification of allergen

# National reglementary management measures



- The regulation of food safety “**Decree no 2-12-389**” mention the food allergen management measures and **lay down the conditions of labelling of Food Product (which include the dispositions regarding food allergen).**

## The obligation of allergen declaration in the labelling

The labelling of any pre-package product must include the information about allergen



## List of ingredients likely to cause an allergy or intolerance

### Appendix 1:

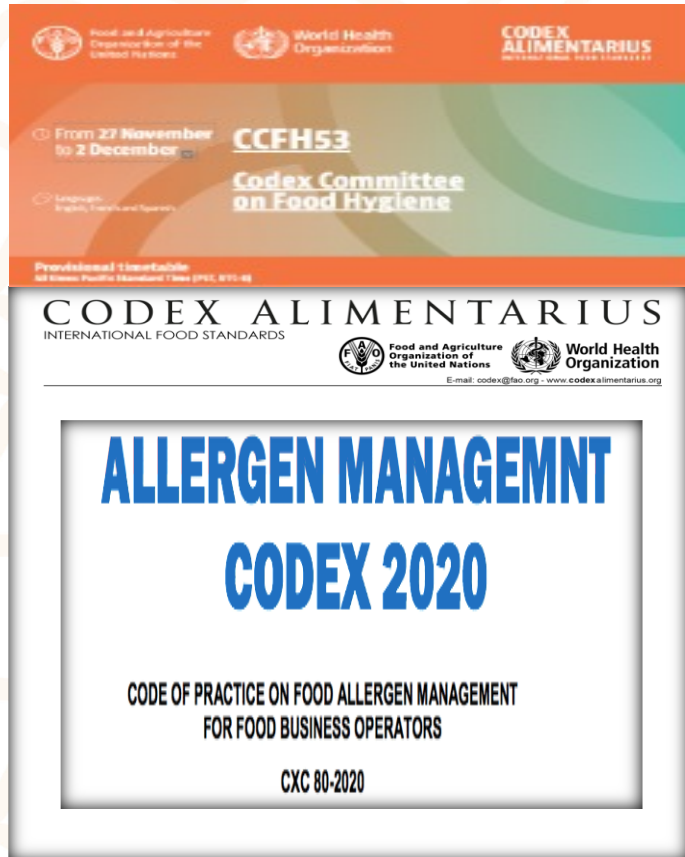


Art 11: “*the name of any ingredient or processing substances likely to cause an allergy or intolerance, or any substance derived therefrom listed in Annex I of this decree*”;





# National standards and procedures



## Adoption of the CODEX

### Principles



*Codex standards related to food hygiene and allergen management have been adopted and implemented as Moroccan standards as well as standard on detection of allergen*

## Norme Marocaine

Code of Practice on Food Allergen Management for Food Sector Operators (not yet approved)

Draft Moroccan standard laying down general principles of food hygiene

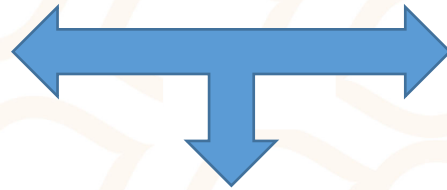
Moroccan standards on detection and validation methods of allergen

Norme Marocaine homologuée

# National labelling for certification

## HACCP & ISO 22000 certification

National labeling referential and system that evaluates, certifies the implementation of a food safety system in accordance with the requirements of national hygiene standard : "HACCP Management System - Requirements" and current relevant regulation.



## GLUTEN-FREE" certification

National labeling referential and system that evaluates, certifies and monitors the absence of gluten in labeled products.

*in collaboration with the Moroccan Association of People Intolerant and Allergic to Gluten (AMIAG),*

The "GLUTEN-FREE" label is a distinctive sign of quality, certifying that the labelled product meets product specifications and food safety standards throughout the food chain, from primary production to final consumption.

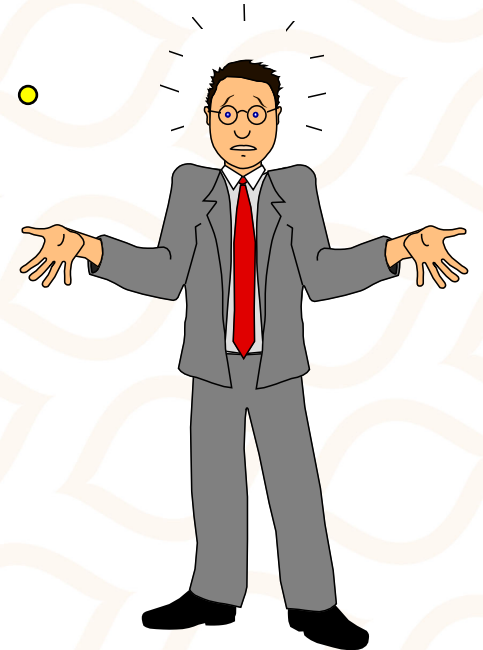


**Moroccan Institut for  
Standardization**



# Gaps and challenges

- **The current allergens and the prevalence of allergy problems in Arab countries?**
- **Level of risk linked to the exposure to food allergen in the Arab countries (risk assessment) according to consumption habit and specificity of the Arab countries?**
- **Action level for allergen controls?**
- **Regional and national mandatory laboratories for allergen identification in the Arab countries?**
- **Harmonized guidelines and procedures and standards for the Arab region?**



# Opportunities



- Identify all relevant Allergens in Arab countries
- Create an Observatory for the monitoring of allergy cases and identification of new food allergen
- Establish harmonized action levels for all relevant allergen in the Arab region
- Develop Allergen risk assessment tool for Arab countries notably for industry to identify, control and assess allergen risks (control of cleaning process and identification of allergen in the raw ingredient and final product)



# Opportunities



- To establish a harmonized guideline for Arab countries identifying the key elements of an effective allergen control plan , and sharing and promoting best practices to consistently and effectively implement best practices for allergen management
- To develop materiel for awareness addressed for consumers, Food business operators;
- Strengthen the competences on Allergen Management and analytical methods and approaches





مؤتمر عُمان الدولي السادس  
لسلامة وجودة الغذاء  
Oman 6<sup>th</sup> International Conference  
on Food Safety and Quality

