



Undeclared Allergens in Multi-Ingredient Meat and Seafood Products with Grain-based Coatings - April 1, 2017 to March 31, 2018

Food allergen - Targeted surveys



Summary

Targeted surveys provide information on potential food hazards and enhance the Canadian Food Inspection Agency's (CFIA's) routine monitoring programs. These surveys provide evidence regarding the safety of the food supply, identify potential emerging hazards, and contribute new information and data to food categories where it may be limited or non-existent. We use them to focus surveillance on potential areas of higher risk. Surveys can also help to identify trends and provide information about how industry complies with Canadian regulations.

Food allergies can affect people of all ages but are particularly common in children. Food allergens can represent a serious or life threatening health risk for allergic individuals. Additionally, although it is not considered an allergen, undeclared gluten may contribute to chronic health issues for those individuals with celiac disease or gluten sensitivity. Allergens and gluten can be found in food due to their presence in the raw ingredients or they can be accidentally introduced along the food production chain due to cross contamination. Regardless of the source of the allergens, industry must ensure that the food produced is safe for human consumption, either by complying with specific Canadian regulations where applicable or by keeping the levels as low as reasonably possible.

The main objective of this survey was to obtain baseline information regarding the presence and levels of undeclared allergens in multi-ingredient meat and fish/shellfish products with a grain-based coating. Of 360 samples tested, 11 were found to contain undeclared allergens including egg, soy, and the milk protein beta-lactoglobulin (BLG). The most frequent positive results of the presence of undeclared allergens were in seafood products.

All positive results were forwarded to the CFIA's Office of Food Safety and Recall (OFSR) to determine if the levels found would pose a health concern to allergic individuals. 5 products tested positive for undeclared egg were deemed to represent a health risk and were recalled.

What are targeted surveys

Targeted surveys are used by the CFIA to focus its surveillance activities on areas of higher health risk. The information gained from these surveys provides support for the allocation and prioritization of the Agency's activities to areas of greater concern. Targeted surveys are a valuable tool for generating information on certain hazards in foods, identifying and characterizing new and emerging hazards, informing trend analysis, prompting and refining health risk assessments, highlighting potential contamination issues, as well as assessing and promoting compliance with Canadian regulations.

Food safety is a shared responsibility. The agency works with federal, provincial, territorial and municipal governments and provides regulatory oversight of the food industry to promote safe handling of foods throughout the food production chain. The food industry and retail sectors in Canada are responsible for the food they produce and sell, while individual consumers are responsible for the safe handling of the food they have in their possession.

Why did we conduct this survey

Approximately 7% of Canadians have self-reported as having at least 1 food allergy, but the actual number of medically confirmed food allergies is expected to be slightly lower¹. It is believed that the rate of food allergies is increasing, particularly among children. Food allergies are estimated to affect up to 5% of adults and up to 8% of children in developed countries². Food allergens are food proteins that can cause a reaction of the body's immune system, and can represent a serious or life threatening health risk for allergic individuals, or contribute to chronic health issues for those with pre-existing health conditions like celiac disease. Celiac disease is a chronic reaction where the body reacts to a component of gluten which can damage or destroy certain intestinal cells. Approximately 1% of the total population are affected with celiac disease³.

The priority food allergens are the 10 most common food allergens that are associated with severe allergic or allergy-like reactions in Canada. These allergens consist of peanuts, tree nuts, sesame, seafood (fish, shellfish and crustaceans), eggs, milk, soy, mustard, sulphites, and wheat⁴. Gluten, while not a true allergen, is a family of proteins found in certain grains like wheat, rye, barley, kamut, and spelt and is included in this list⁵. Gluten can cause digestive problems and other issues for people with certain health conditions such as celiac disease and gluten sensitivity. This makes proper identification and labeling of allergens in food by the manufacturer essential.

Undeclared allergens can be found in foods due to their presence in the raw ingredients, or can be accidentally introduced along the food production chain through cross contamination. Regardless of the source of the allergens, industry must ensure that the food they produce is safe for human consumption. This can be achieved by complying with specific Canadian regulations where applicable, or by keeping the levels as low as reasonably possible.

A previous survey conducted by the CFIA in 2014/15 analyzed undeclared allergens and gluten in prepackaged meat products. A second survey conducted in 2015/16 analyzed allergens and gluten in processed fish and seafood products. The current survey, however, was the first to limit sampling specifically to breaded and grain-coated products. The main objective of this survey was to obtain baseline information regarding the presence and levels of undeclared

allergens including milk (BLG and casein), egg, almond, hazelnut, peanut, sesame, soy, and gluten in grain-coated meat and fish products.

All products were tested “as sold,” meaning that they were not prepared as per the manufacturer’s instructions or as they would typically be consumed.

What did we sample

All products were sampled between May 2017 and March 2018. Samples were collected from local and regional grocery stores located in 6 major cities across Canada. These cities encompassed 4 geographical areas: Atlantic (Halifax), Quebec (Montreal), Ontario (Toronto, Ottawa) and the West (Vancouver, Calgary). The number of samples collected from these cities was in proportion to the relative population of the respective areas.

The following products were not included in the survey:

- products with **all** of the following allergens in the list of ingredients - almond, hazelnut, milk/dairy, peanut, soy, egg, sesame, and wheat, barley, oats, rye, triticale, kamut, spelt or gluten
- products with no list of ingredients
- products with a precautionary statement for all priority allergens
- products past the “use by” or “best before” date
- non-prepackaged products
- products with multiple flavours

Table 1. Distribution of samples based on product type and origin

Product type	Imported	Total
Prepared meal – Pocket/dumpling/wonton	106	106
Prepared meal – Burrito/roll	90	90
Prepared meal – Meat pie/quiche	69	69
Seafood – Refrigerated/frozen	82	82
Meat – Breaded	13	13
Total	360	360

How were samples analyzed and assessed

Samples were analyzed by an ISO/IEC 17025 accredited food testing laboratory under contract with the Government of Canada. The samples were tested as sold, meaning that the product was tested as-is and not as prepared according to package instructions.

In Canada, food allergens and gluten must be declared in the list of ingredients if they are present in the prepackaged product in order to comply with the requirements of the [Food and Drug Regulations Section B.01.010.1](#). A prepackaged product will be deemed non-compliant if any level of undeclared allergens and gluten is detected.

Health Canada considers that gluten-free foods, prepared under good manufacturing practices, which contain levels of gluten not exceeding 20 parts per million (ppm) (due to cross contamination) meet the intent of the [Food and Drug Regulations Section B.24.018](#) for a gluten-free claim.

What were the survey results

Over 96% of all imported meat and fish products with grain-based coating sampled in this survey did not contain any detectable levels of undeclared allergens. These positive results primarily resulted from detection of low levels of egg. The majority of undeclared allergens found were in refrigerated and frozen seafood products. The results for the 11 samples found positive are shown in table 2.

Table 2: Levels of undeclared allergens in grain-coated multi-ingredient meat and fish products in ppm

Sample	BLG (ppm)	Egg (ppm)	Soy (ppm)
Frozen shrimp shaomai		31.1	
Shrimp dumpling gyoza		17.3	
Frozen spring rolls with crab and shrimp meat			6.2
Steamed shrimp roll		0.6	
Breaded butterfly shrimp		1130	
Butterfly breaded shrimp		1084	
Breaded butterflied shrimp		18.5	
Breaded Alaska pollock fillets fish burger			3.2
Blue hake fish cutlet			0.88
Potato crunch breaded Alaska pollock fillets			0.68
Large popcorn shrimp	0.5		

Note: All samples were tested for a variety of allergens dependant on the ingredients in the food. Only positive results for allergens were included in the table.

What do the survey results mean

Of the 360 samples tested, over 96% did not contain any detectable levels of undeclared allergens and gluten, while 11 samples were found to contain varying levels of BLG, egg or soy. Undeclared allergens were most frequently present in frozen and refrigerated seafood products.

All positive results were forwarded to the CFIA's OFSR for follow-up. The extent of the follow-up actions taken by the CFIA is based on the level of contamination and the resulting health concern as determined by a health risk assessment. Appropriate follow-up actions include additional sample testing, facility inspection and product recall. The health risk assessment is based on exposure to the allergens and gluten through consumption. The exposure is calculated by using the typical serving sizes for each food. Assessment based on serving size

means not all detectable levels of undeclared allergens and gluten in food will cause a reaction in an allergic individual.

Egg

Egg was the most frequently found undeclared allergen present in foods in this survey. It was detected in 6 of the products tested, 5 of which were recalled^{6,7,8,9,10}. Egg can be effective in the food breaded process as egg white solids can be used as an emulsifier which aids in adding integrity and adhesion to grain-based coatings¹¹. It is also possible that the levels of egg present were as a result of cross-contamination.

Soy

4 products tested contained low levels of soy. These levels were possibly a result of cross contamination during the manufacturing process or of soy being present in 1 of the ingredients. Both of these scenarios could result in the presence of a small amount of allergen in the final product. None of these products were determined to present a health risk to consumers.

Milk

The milk protein BLG was detected in 1 sample tested. The levels determined for BLG in this survey were low and below what is expected to be of any functional value as an additive. This possibly indicates it was present as a result of cross contamination in an ingredient or the final product. The detected level was determined not to pose a risk to consumers.

Summary

Other than the 5 samples which resulted in recalls, all other positive allergen findings were determined not to pose a risk to consumers.

This survey generated new information on the background level of undeclared allergens and gluten in imported breaded or grain-coated meat and fish products collected from 6 cities across Canada. Information gathered in this survey, in conjunction with other data including the Canadian Total Diet Study, and Statistics Canada's Canadian Health Measures Survey food consumption data, are critical in assessing the health risk that our food supply poses to Canadian consumers. The results of CFIA's surveillance activities are also used to inform the Canadian public and stakeholders by raising consumer awareness and help build public confidence in their food supply by removing non-compliant products.

References

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