



Canadian Food
Inspection Agency

Agence canadienne
d'inspection des aliments

Undeclared milk in dairy alternative products – April 1, 2022, to March 31, 2023

Food allergen – Targeted surveys



Canada

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Executive 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 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 additional information regarding the presence and levels of undeclared milk in dairy alternative products. Of the 400 samples tested, 6 samples were found to contain undeclared milk proteins beta-lactoglobulin (BLG) and casein.

All positive samples 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. The extent of the follow-up actions taken by the Agency were based on the level of the contamination and the resulting health concern as determined by a health risk assessment by Health Canada. 2 of the products sampled in this survey were found to represent a health risk and were recalled.

What targeted surveys are

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 the survey was conducted

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.

The main objective of this survey was to obtain additional information regarding the presence and levels of undeclared milk in dairy alternative 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 we sampled

All products were sampled between April 2022 and March 2023. Samples were collected from local and regional grocery stores located in 6 major cities across Canada. These cities represented 4 geographical areas:

- Atlantic (Halifax)
- Quebec (Montreal)
- Ontario (Toronto, Ottawa)
- West (Vancouver and 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 milk in the list of ingredients
- Products with a precautionary statement for milk
- Non pre-packaged products/bulk bin products
- Products with no list of ingredients
- Products past the best before date

Table 1: Distribution of samples based on sample type and origin

Sample type	Domestic	Import	Unspecified ^a origin	Total
Dairy-free butter/spread	1	25	13	39
Dairy-free cheese	13	21	3	37
Dairy-free cream	0	29	5	34
Dairy-free dessert	33	53	26	112
Dairy-free milk (others)	13	20	7	40
Dairy-free oat milk	58	28	16	102
Dairy-free yogurt	11	10	15	36
Total	129	186	85	400

Table notes

^a Unspecified refers to those samples for which a country of origin could not be determined from the product label or available sample information.

How samples were 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 claim⁵.

Results of the survey

98.5% of the dairy alternative products tested in this survey contained no detectable levels of milk. The results for 6 positive samples are shown in Table 2 below.

Table 2: Levels of undeclared milk in dairy alternative products in parts-per-million (ppm)

Sample type	Sample description	BLG ^b	Casein ^c
Dairy-free cheese	Cashew cheese	0.22	1.43
Dairy-free cheese	Cream cheese	0.11	1.43
Dairy-free butter/spread	Butter	ND ^d	0.69
Dairy-free cream	Sour cream	0.375	1.76
Dairy-free dessert ^e	Vegan chocolate bunnies	1.55	9.35
Dairy-free dessert ^e	Chocolate coconut cream	2.5	26.4

Table notes

^bBLG stands for β -Lactoglobulin which is the major whey protein of milk, and BLG is an indicator of the presence of milk in the product.

^cCasein is another major protein found in milk and is also an indicator of the presence of milk in the product.

^dNot detected

^eRecalled product

What the survey results mean

Of the 400 samples tested in this survey, 98.5% did not contain any detectable levels of milk, while 6 samples were found to contain at least 1 undeclared milk protein (BLG or casein). All positive samples were forwarded to the CFIA's OFSR for follow-up. 2 of the products sampled in this survey were found to represent a health risk and were recalled.

The extent of the follow-up actions taken by the CFIA were based on the level of contamination and the resulting health concern as determined by a health risk assessment performed by Health Canada. Appropriate follow-up actions include additional sample testing, facility inspection and product recall. The health risk assessment is based on exposure to the milk proteins through consumption, and the exposure is calculated using the typical serving sizes for each food. Assessment based on serving size means not all detectable levels of undeclared allergens in food will cause a reaction in an allergic individual.

Milk

Both undeclared BLG and casein were detected in 2 dairy-free cheese, 2 dairy-free dessert products and dairy-free cream and 1 dairy-free butter/spread product contained only casein. BLG (a whey protein) and casein are major milk proteins. Casein derivatives such as sodium caseinate are used as emulsifiers and thickening agents in processed foods⁶. Whey proteins also have excellent emulsifying and foaming properties, so they are widely used in producing processed foods^{7,8,9}. Low levels of BLG and casein found in this survey could also be introduced into the product due to cross contamination on the production line¹⁰. Both dairy-free dessert products (vegan chocolate bunnies product, and chocolate coconut cream) were deemed to pose a health risk to consumers, and were recalled^{11,12}.

Summary

2 dairy-free dessert products resulted in product recalls, while all other positive allergen findings in this survey were determined not to pose a risk to consumers.

The current survey results (1.5% positive rate) are lower than those found in a similar survey conducted in 2018 by CFIA (2.38% positive rate). In that survey, 252 samples were tested and 6 of the samples were found to contain at least 1 undeclared beta-lactoglobulin (BLG) and casein.

The current survey results are higher than those found in a similar survey conducted in 2011 by CFIA (0.72% positive rate). In that survey, 278 samples were tested and 2 of the samples were found to contain at least 1 undeclared beta-lactoglobulin (BLG) and casein.

This survey generated additional information on the presence and level of undeclared milk in dairy alternative 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 the 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.

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