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Addition to Fedima's position paper on the labelling of allergens

Fedima members are advised to adopt and implement a policy on allergens which should include measures in place to exclude cross contamination, a risk assessment of possible cross contamination and guidelines used to inform customers on cross contamination risks. The starting point for a policy on allergens could be Fedima's position paper of 2nd June 2004. At the request of the Executive Committee cross contamination has been detailed in the next paragraphs. This information could be used by Fedima members in formulating an allergen policy.

Cross contamination

The Fedima allergen policy requires the transmission of information on cross contamination risks. Cross contamination risks must be analysed in each production location and includes risks in the production of raw materials at the supplier's production site.

Production sites should be carefully screened for the risk of cross contamination with allergens of Annex IIIa.

Ingredient suppliers are required to complete raw material specification sheets including allergen information. For each allergen listed the presence or absence via ingredients or via cross contamination must be indicated. The raw material specification sheet should also include information on the existence of an allergy policy. During supplier audits the effectiveness of the system should be assessed.

Cross contamination in raw materials

Ideally information on cross contamination from suppliers will undergo a (HACCP) risk evaluation. Based on this risk evaluation it will be decided whether or not the information is transferred to the next link in the chain. Factors to be considered are: probability of cross contamination, maximum concentration of a given allergen through cross contamination in the raw material and in the finished product and the magnitude of adverse health effect (high for nuts and peanuts, low for lactose).

If cross contamination of certain allergens, e.g. peanuts and nuts in raw materials is unacceptable as a matter of company policy and if cross contamination of these allergens is indicated a solution should be negotiated with the supplier of these raw materials to exclude this.

If cross contamination in raw materials is indicated by the supplier and a health risk can not be excluded this information should be transmitted to the next link in het chain:

Additional allergen information:

“This product has been produced on a production line, also processing: X, Y, Z.”

where X, Y and Z are substances mentioned in Annex IIIa.

Remark 1: it is felt that the source of cross contamination “raw materials = supplier's production line “ or “bakery ingredient manufacturer's production line” is not relevant to our customer.

Remark 2: information on cross contamination with one ore more allergens in raw materials used will only be considered to cause cross contamination in those products where the raw material is used in. Other products produced on the same production line, not containing the said raw material will be considered to be free of cross contamination which may lead to adverse health effects.

Cross contamination in production

If cross contamination in production can not be avoided and a health risk can not be excluded this information should be transmitted to the next link in het chain:

Additional allergen information:

“This product has been produced on a production line, also processing: X, Y, Z.”

where X, Y and Z are substances mentioned in Annex IIIa.

It is advised to use this phrase in all cases where the same production line is used or where (parts of) production lines are not completely segregated. Examples: using raw material containers for different types of products, using the same raw material transport system for several production lines.

Test production

Test productions with new ingredients containing allergens that have not been present on the given production line can only take place when the line is thoroughly cleaned after the test run.

Production lines

When moving products between production lines it must be avoided that the cross contamination risk is increased. Before a decision is made to produce a given product on a non-assigned production line a risk analysis on allergen cross contamination must be carried out.

Rework

When “new” allergens are introduced in a product through rework this falls within the scope of the labelling directive and consequently the ingredient list must be adapted.

Products with “free from” claim

For products carrying a “free from” claim a special production regime must be in place and ingredients used may not be cross contaminated with the allergen for which the claim is made. The production regime includes dedicated production lines and/or thorough cleaning before the “free from” production begins. These procedures should be well documented and the effectiveness of the cleaning must be verified.

Proposed by the Technical Committee meeting (9th June 2005)

Endorsed by the Executive Committee meeting (13th December 2005)