



*Fédération européenne des fabricants et fournisseurs d'ingrédients pour la boulangerie, la confiserie et la pâtisserie  
Verband der Hersteller und Zulieferer von Bäckerei- und Konditoreirohstoffe in der Europäischen Union  
Federation of the European Union Manufacturers and Suppliers of Ingredients to the Bakery, Confectionery and Patisserie Industries*

**Fedima c/o AGEP S.A., Boulevard St Michel 77-79, B-1040 Brussels**  
**e-mail : [fedima@agep.be](mailto:fedima@agep.be) Tel: +32 2 740 29 65 Fax: +32 2 736 81 75**

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## **Fedima Position Paper on Labelling of allergens**

### Introduction

Directive 2003/89/EC is an amendment of Directive 2000/13/EC as regards indication of the ingredients and substances present in foodstuffs with the specific objective to improve consumer information on allergenic ingredients and products thereof except where it has been demonstrated that products thereof are not able to trigger adverse reactions.

The new directive applies only to ingredients and substances voluntarily used in a foodstuff. The question of adventitious presence of allergenic substances in a food (cross contamination) is not addressed by the new rules.

Ingredients and products thereof which may induce food allergies or food intolerances and must therefore be labelled are listed in Annex IIIa of the directive. The scope of application of the amending directive is the same as that for the labelling directive:

- Foodstuffs to be delivered to the ultimate consumer
- Foodstuffs intended for supply to restaurants, hospitals, canteens etc.

### Fedima

Allergen labelling must be clear, accurate and meaningful. Therefore Fedima welcomes the regular review of the scientific basis for allergen labelling possibly leading to exemptions from allergen labelling requirements of derivatives not able to trigger adverse reactions.

As manufacturers and suppliers of food ingredients Fedima members will inform their customers by giving the required allergen labelling information on the product label and/or on the product information sheet. On top of that Fedima members will provide information on the potential presence of allergens because of cross contamination. This information should be based upon a risk evaluation (e.g. HACCP) where various formulations are produced on the same production line or in the same production room taking into account the cleaning procedures in place. Generally the presence of allergenic ingredients on a production site is not regarded as critical.

Fedima's policy is to avoid "free from ....." claims, except for products especially produced and marketed for specific groups of allergic people.

#### Summary

Fedima members will:

- Provide labelling information on allergenic ingredients and substances according to Directive 2003/89/EC\*
- Provide information on cross contamination risks in the production process\*
- (as a matter of policy) avoid "free from ..." claim.

\*) information will be given to direct customers only. Information will be printed on the product label and/or on the product information sheet.

**Proposed by the Technical Committee meeting (2<sup>nd</sup> June 2004)**

**Endorsed by the Executive Committee meeting (16<sup>th</sup> June 2004)**