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Federation of the European Union Manufacturers and Suppliers of Ingredients
to the Bakery, Confectionery and Patisserie Industries

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POSITION PAPER

STATUS OF RELEASE AGENTS

The EU legislation has always considered release agents as processing aids. Specific provisions in Member States, such as the French decree on processing aids, confirm the principle.

Functionality and use of release agents in bakery wares

The function of release agents is to facilitate the release of foodstuffs from moulds, baking sheets or tins etc during the baking process.

In earlier times, release agents were edible fats and oils. In modern food production release agents are compound products with better results.

Release agents are mixtures of various food ingredients: edible oils and fats (as main ingredients), combined with

- Waxes, lecithins or magnesium stearate (for improved release effect),
- Emulsifiers (for improved coating of the mixture) and/or
- Anti-oxidants (for improved oxidation stability of the mixture).

Benefits of the use of release agents

The benefits of release agents are simple:

- Stability of industrial production process
- Limitation of cleaning of moulds and machines (environmental and time benefits)
- Reduction of food waste

How does it work?

- Release agents can be layed or sprayed onto a mould
- Release agents form a thin and unbroken layer on the surface of the mould and remain undamaged for several production runs preventing dough or parts of the bake product to stick to the mould.

Examples:

- Release of baked goods from moulds during the production process
- Separation of sugar masses from cooling tubs in boiled sweets production

Quality of release agents:

- Good hydrophobic qualities (i.e. hardly or not soluble in water)
- Capable of forming a thin, undamaged layer on surfaces and sides of moulds with good adhesive power even at high temperatures
- No reaction or insignificant one with the food and not becoming easily resinous or char
- Protection of the mould (mainly against corrosion in metal based moulds such as tin)

Legal status of Release agents

Definitions

Substances are recognized as food ingredients when they meet the EU definition of ingredients outlined in Article 2 of Regulation 1169/2011 on food information to consumers¹:

(f) 'ingredient' means any substance or product, including flavourings, food additives and food enzymes, and any constituent of a compound ingredient, used in the manufacture or preparation of a food and still present in the finished product, even if in an altered form; residues shall not be considered as 'ingredients'

Besides, processing aids are defined in Article 3.2 of Regulation 1333/2008 on food additives² as:

(b) 'processing aid' shall mean any substance which:

- (i) is not consumed as a food by itself;
- (ii) is intentionally used in the processing of raw materials, foods or their ingredients, to fulfil a certain technological purpose during treatment or processing; and
- (iii) may result in the unintentional but technically unavoidable presence in the final product of residues of the substance or its derivatives provided they do not present any health risk and do not have any technological effect on the final product;

The release agent sticks firmly to the surface of moulds and only technically unavoidable quantities could be passed on to the foodstuff.

¹ OJ L304, 22.11.2011, p. 26.

² OJ L 354, 31.12.2008, p. 16.

Thus the technological need performed by release agents meets the EU definition of processing aids. Moreover, the use of processing aids may result in the presence of residues in food but these residues are not considered as food ingredients (except for allergens) according to the FIC Regulation.

EC note on the status of vegetable oil pan spray for professional use

Directive 2001/5/EC authorizes the use of propellant gases in vegetable oil pan spray³.

Following the publication of Directive 2001/5, the European Commission has clarified in a note to Member States the status of release agents and the use of food additives in release agents⁴. In point 2 the Commission states that *"release agents are considered as processing aids and, therefore, not subject to specific Community [now: Union] law"*.

Point 6 clarifies the use of propellant gases in vegetable oil pan spray is authorized. The Commission also recognizes that "these sprays can be used also for spraying directly the food (e.g. garlic flavor on pizza); making it justified to include their use in the directive for food additives."

Conclusion

The European Commission confirms in a note to the Member States of 2001 that release agents are considered as processing aids. If European legislation on additives has moved from Directive to Regulations, it should be stressed that the legislation has not change the principles of the Directives. The Commission note of 2001 remains valid. National legislation on processing aids (French decree on processing aids⁵) also confirms the status of release agents as processing aids.

Adopted by the Executive Committee on 7 May 2014

³ DIRECTIVE 2001/5/EC of 12 February 2001 amending Directive 95/2/EC on food additives other than colours and sweeteners

⁴ DG SANCO/D/3/SH D(2001) from 20 November 2001

⁵ Arrêté from 19 October 2006