

FOOD ALLERGEN MANAGEMENT THROUGHOUT THE SUPPLY CHAIN: EXPECTATIONS, TOOLS, AND GUIDANCE

Background

The European Commission has published the Commission Notice¹ on “The implementation of food safety management systems covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses”, in September 2022. This updated Notice states that food allergens must be considered as part of the food safety management system. The Food Hygiene Regulation² (Reg. EC No 852/2004) lays down provisions on food allergen management in primary production and subsequent stages, highlighting the need for a comprehensive preventive approach along the whole food chain.

Both publications highlight that good hygiene practices are needed to prevent or reduce the unintentional presence of substances causing food allergies or intolerances due to cross-contamination.

Objective

This paper is addressed to FoodDrinkEurope members and to all relevant stakeholders throughout the food chain. It contains recommendations and links to various documents (and associated tools) on food allergen management, which are useful to meet the best practices described in the Commission Notice, especially in these times of increased supply chain disruption.

With this paper, FoodDrinkEurope aims to support its members and stakeholders in implementing best practice food allergen management including the provision of information throughout the supply chain, in order to ensure that risk management measures, including labelling, are appropriately applied to assure consumer safety and product compliance.

Food allergen management throughout the supply chain: expectations

The Notice recognises that cross-contamination cannot always be prevented and summarises expectations for preventing or minimising the risk of food allergen contamination.

Regulation (EC) No 852/2004 lays down provisions on allergen management that apply across the entire food chain, from primary production to all subsequent stages. This includes risks in cultivation, harvest and slaughter.

In the Notice, considerations for raw materials are covered, including the need for information on specifications (more information available in Sections 3.4. Raw materials - supplier

¹ Commission Notice on the implementation of food safety management systems covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses (2022/C 355/01)

² Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs

selection, specifications and 3.7 Allergens). Concerning expectations for allergen management:

- Where unintended food allergen presence is mentioned in raw materials, there is an expectation that suppliers shall provide a **quantification** (mg allergenic protein / kg food) to enable the food manufacturer to apply risk assessment.
- If regulated food allergens or products containing these are used as raw materials or ingredients, awareness of staff on allergen management should be ensured and specific attention should be given to ensure minimum risk of cross-contamination of other products, allergen labelling and recipe application of these products.
- Procedures should be in place to prevent the exchange of products (raw materials, intermediated products and finished end products) and labels.
- Strict measures to minimise cross-contamination should be applied with products potentially containing regulated food allergen(s) to other products without food allergens or containing different food allergens.
- Attention to the potential for cross-contamination should also be paid at preparatory stage.

Regarding Precautionary Allergen Labelling (PAL), the Notice explains that according to Regulation (EU) No 1169/2011³, information on the possible and unintentional presence in food of substances or products causing allergies or intolerances may be provided on a voluntary basis, while ensuring the food is safe in accordance with provisions laid down in Regulation (EC) 178/2002. Such voluntary information must not be misleading or confusing to consumers and must be based on relevant scientific data. Furthermore, it is stated that 'Precautionary allergen labelling (PAL), should only be used where a preventive strategy cannot be efficiently implemented and the product may present a risk to allergic consumers. PAL is a separate statement next to the list of ingredients and should be based on the findings of an appropriate risk assessment, conducted by the food manufacturer, to evaluate the possible and unintended presence of allergens. Allergens (potentially) present in the product via cross-contamination should not be included in the list of ingredients as they are not intentionally added and are no part of the formula of the product. Such labelling should never be used as an alternative to preventive measures'.

FoodDrinkEurope is aligned with the expectations in the Notice related to allergen management. Our position is that PAL should only be applied where a defined, appreciable risk has been identified, including (where it is relevant and possible) through a **quantitative risk assessment** to evaluate the possible and unintended presence of allergens.

Useful Resources

The Commission Notice summarises some of the best practices applicable to food allergen management across the entire food chain. Food allergen management is a shared responsibility which relies on all the actors playing their part and sharing information in an accurate and timely manner, to prevent potential (and possibly severe) risks to allergic consumers.

In order to meet the expectations of the Commission Notice and industry best practices, the following guidance is recommended:

³ Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers

General Guidance developed by food industry stakeholders

- [FoodDrinkEurope Guidance on Food Allergen Management for Food Manufacturers – Version 2](#)
- [Allergen Bureau: How to assess risk when managing allergens in your food business](#)

Guidance on the application of quantitative risk assessment

- [ILSI Europe Practical Guidance on the Application of Food Allergen Quantitative Risk Assessment within Food Operations](#)
- [ILSI Europe Practical Guidance on the Application of Food Allergen Quantitative Risk Assessment within Food Operations – Final Webinar](#)
- [Precautionary Allergen Labelling \(PAL\): a science based approach based on Quantitative Risk Assessment - FoodDrinkEurope non-paper](#)
- [Food Allergy Canada: Allergen Management Guidelines for Food Manufacturers](#)

Authoritative guidance

- [Commission Notice on the implementation of food safety management systems covering Good Hygiene Practices and procedures based on the HACCP principles, including the facilitation/flexibility of the implementation in certain food businesses \(2022/C 355/01\)](#)
- [Codex Alimentarius Code of Practice on Food Allergen Management for Food Business Operators](#)
- [Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens - Part 1: Review and validation of Codex priority allergen list through risk assessment](#)
- [Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens - Part 2: Review and establish threshold levels in foods of the priority allergens](#)
- [Ad hoc Joint FAO/WHO Expert Consultation on Risk Assessment of Food Allergens - Part 3: Review and establish precautionary labelling in foods of the priority allergens](#)

FoodDrinkEurope would also like to reiterate the need for food manufacturers to increase checks in their supply chains, to ensure that appropriate allergen management controls are in place during the current period of increased supply chain disruption. The RASFF alerts related to the presence of peanut protein in soybean lecithin imported from India and wheat which was reported as contaminated with mustard are just some recent examples of incidents due to issues throughout supply chains. In relation to this, we would like to draw attention to relevant recent publications and useful links (courtesy of the Australian organization Allergen Bureau):

- [Risk Rise Due to Supply Chain Chaos](#)

- [Assessing Agricultural Cross Contact Guide – 2022](#)
- [Assessing Agricultural Cross Contact Webinar](#)
- [Raw Material Risk Matrix Questionnaire spreadsheet \(zip file\)](#)