

Criteria for allergy-friendly food products

BACKGROUND

Allergies are among the most common chronic conditions. Food allergies can be triggered by various ingredients and require reliable consumer information. For those affected, transparent labelling, compliance with legal requirements and effective allergen management within the food production industry are of paramount importance.

The ECARF Seal of Quality identifies foods that meet enhanced requirements for allergen control, declaration and quality assurance, and are produced using a proven, effective allergen management system.

The award of the seal is based on three pillars

- Production
- Declaration
- Monitoring

1. PRODUCTION

The manufacturer must demonstrate that it has a documented and effective allergen management system in place. This includes, in particular, the assessment of allergen risks throughout the entire supply and production chain.

These include

- Supplier qualification and monitoring
- Risk assessment of the raw materials used
- Measures to prevent cross-contamination
- Documented cleaning procedures
- Regular staff training
- Traceability of relevant production steps

2. DECLARATION

Labelling must comply at least with the applicable food law regulations, in particular Regulation (EU) No 1169/2011. In addition, the following requirements of the ECARF Quality Seal apply.

2.1. “Free from”

The claim “free from” may only be used if the manufacturer can demonstrate that the allergen in question is present below the analytical detection limit, as determined by a recognised analytical method such as ELISA.

The allergens in question must be clearly, visibly and comprehensibly labelled on the packaging with the term “free from” (e.g. “free from peanuts”). The strictest regulations for effective allergen management apply here.

2.2. Extended labelling

In addition to the information currently required by law to be included in the list of ingredients (Regulation (EU) No 1169/2011), other relevant allergenic ingredients should be clearly indicated in the list of ingredients (see the table in the Annex entitled ‘Additional declarations’).

The allergen declaration on the product should also include meaningful information regarding the possible presence of unintentional traces of allergenic substances (‘allergenic traces’). The trigger threshold for this is 0.5 mg of allergenic protein per 100 g or 5 mg of allergenic protein per kg (5 ppm).

If the allergen traces are below this threshold, no trace labelling is required; if they are at or above the specified threshold, the label must include the following statement: ‘May contain: [allergen]’.

All information must be traceable, scientifically substantiated and verifiable within the framework of quality management. The aim of allergen management through appropriate measures should be to reduce allergenic traces to a minimum and to eliminate them.

3. CONTROL

Compliance with the requirements is regularly monitored through independent audits.

Audits are generally carried out at least twice a year, as well as on the following occasions:

- Changes to the formulation,
- Changes to raw materials or suppliers,
- Changes to the production process,
- Anomalies in quality management.

4. DISCLAIMER

Despite comprehensive preventive measures, it is not possible to guarantee that products are completely free from allergens. Analytical detection limits and residual risks associated with the production process cannot be entirely ruled out.

The award of the ECARF Seal of Quality confirms compliance with the defined requirements; however, it does not guarantee the complete absence of allergenic substances.

ANNEX: FOOD DECLARATIONS

The following ingredients are declared when used in the formulation of the product:

Legally required declaration of 14 allergens (Regulation (EU) No. 1169/2011)	Additional declarations
▪ Cereals containing gluten, namely: wheat (such as spelt and Khorasan wheat), rye, barley, oats or hybrid strains thereof, and products made from them ▪ Crustaceans and crustacean products and products derived therefrom ▪ Eggs and products derived from them ▪ Fish and products derived from them ▪ Peanuts and products derived from them ▪ Soya beans and products derived from them ▪ Milk and products derived from it (including lactose) ▪ Tree nuts, namely almonds, hazelnuts, walnuts, cashews, pecans, Brazil nuts, pistachios, macadamia or Queensland nuts, and products derived therefrom ▪ Celery and products derived therefrom ▪ Mustard and products derived therefrom ▪ Sesame seeds and products derived therefrom ▪ Sulphur dioxide and sulphites exceeding 10 mg/kg or 10 mg/l as total SO₂ ▪ Lupins and products derived therefrom ▪ Molluscs and products derived therefrom	▪ Spices: anise, caraway, chamomile, coriander, cinnamon, pepper ▪ Nightshade plants and vegetables: paprika, tomato, chilli, carrot ▪ Fruit: melon, kiwi, mango, banana, apple, pear, cherry, peach, plum, nectarine, apricot, lychee ▪ Carrageenan ▪ Guar gum ▪ Locust bean gum ▪ Poppy seeds ▪ Balsam of Peru ▪ Millet ▪ Buckwheat