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Datum 10.09.2018	Verfasser Šuško	SD Risk Assessment Cross Contacts with native Allergens		

1. Preface

VO (EU) 1169/2011 demands a declaration of allergens in food to protect consumers. Unfortunately, the legislation does not give an indication about threshold values and their correct declaration. Food processors are now requested to perform a risk assessment to assess the intake of native allergens, being cross contacts from the Origin. AKO already maintains a valid allergen management in production, thus a cross contact in our own production can be excluded.

2. Objective

This Risk Assessment is a decision making tool to assess risks of native allergens and to define a correct declaration in order to protect the consumer.


3. Given Parameters

Native allergen cross contacts could be caused by seed impurities, cross-pollination, wintering-conditions, agriculture conditions, as well as drying procedures, cross-contacts during production, cleaning and storage in the origin. Those intakes cannot be influenced by the importer and allergic consumers can just be warned by using an appropriate declaration.

4. Approach

The risk assessment is performed by using analytical data, which are examined according to analysis cluster (see <http://www.ako-spice.com/AKO/wp-content/uploads/2015/02/WI-Laboratory-test-Incoming-goodsFinal-products-other.pdf>), focused on affected products and known allergens, i.e. GLUTEN, MUSTARD, CELERY; PEANUTS AND ALMONDS. Sulfite in garlic and ginger will not be regarded as it could be produced by the plants on their own. If sulfite is used as an additive, it will be marked as an ingredient. In this risk assessment we use the highest values we analyze in our numerous studies (Principle of prudence)

Subsequently, we defined reference values, based on the results of VITAL 2 Risk Assessments and ALT/ALTS (guideline values for food control administration published by the Federal Ministry of Consumer Protection food and Agriculture). The Vital 2 Risk Assessment is based on Reference quantity of 2 g spices in 100 g final product. Both values – Vital 2 and ALT/ALTS – have been compared and, as a matter of precaution, the lowest values of both is considered in each way.

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5. Evaluation/Assessment

Analyzed values are compared with the defined reference values, followed by a determination of allergen declaration. The following classification is defined like:

Allergen	Gluten	Mustard	Celery	Peanuts	Almonds
Action Level 1 (no declaration)	< 20	< 5	< 20	< 5	< 20
Action Level 2 (may contain)	≥ 20	≥ 5	≥ 20	≥ 5	≥ 20

Action Level 3 „contains“ is omitted, because this is not foreseen for native cross contacts.

6. Declaration/Labeling


If an allergen declaration is necessary according to the a.m. classification, it will be declared as follows:

“May contain: “ALLERGEN NAME”. The declaration will be stated in the article text, in specifications and analyses. The analyzed values are recorded in the analysis report, when they are found according to our Action Level 2.

After the last evaluated analysis data:

- Products for which the findings are above the "Action Level" of the risk assessment are marked with "May contain" and will in future only be analyzed in monitoring.
- Additionally analyses are carried out if they are commercial products or products where information is obtained through association, rapid alert system or other sources.

Specifications and analyses should refer to ESA labeling recommendation ((<http://esa-spices.org/index-esa.html/publications-esa>)). Moreover, it has to be pointed out that natural products can contain unintended intake of allergens. This cannot be excluded by 100 %. Furthermore, an exclusion of liability in our specification and analysis indicates that analytical data do not replace customers' own incoming product controls.

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7. Data update

New analysis dates will be regarded in the Risk Assessment. If any new knowledge that emerges from it will cause

- a need for an immediate measure initiation or rather
- a changing of our analyses cluster (Analyses plan)

Management and Quality Manager will be informed accordingly. The action plan will be documented in the “Form Maßnahmeplan”.