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1. Introduction

To protect consumers, the main allergens in food must be labeled in accordance with VO (EU) 1169/2011. However, this regulation does not provide any information about native allergen entries, i.e. origin-related allergens that can reach the products as cross contacts in the growing countries, and their correct labeling of allergens. Food businesses are therefore encouraged to do a risk assessment. As AKO is has an functioning allergen management in its own production, operational cross-contamination can be excluded. Therefore, this risk assessment evaluates the "native allergen entries" only.

2. Objective

is to find a basis for decision-making on risk assessment and build on it to declare native allergen entries appropriately to protect consumers.

3. Known parameters


Native allergen inputs could be caused by seed contamination, pollen count, wintering conditions, agricultural processing, in addition drying processes, cross contacts during preparation and cleaning, raw material storage etc. Entries from this cannot be avoided from our side; allergic consumers can only be warned with appropriate declarations.

4. Procedure

The risk assessment is carried out with the help of analysis data, compressed on the affected products and their allergens. (Here GLUTEN, MUSTARD, CELERY, PEANUTS and ALMONDS). SULFIT is not considered for garlic and ginger because both spices can produce natural sulfite, which is not considered an allergen. When sulfite is added, it is labeled as an ingredient. The highest measured values are used as a basis for this. (Caution principle)

In addition Vital 3 and ALT/ALTS values were considered, when determining the limit values. After **determining the limit values, the exposure** (the **highest** value in mg / kg analyzed in the period 2015-2019) was **entered and calculated as Allergen protein in the final product**. After multiplying the allergenic protein value by the reference dose (assuming 10 g spices per serving here), the **action level of the individual product mg / serving was determined**.

1) LMI = Food Information Ordinance, 2) ALT / ALTS: Working group of experts in the field of food hygiene and food of animal origin.

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5. Evaluation / evaluation of allergens as native cross contacts

The subsequent **assessment** showed whether the action level per portion is **above the reference value or the analytical limit of quantification**. In this case, the allergen in the product will be rated "may contain" reference value.

6. Labeling

If an allergen have to be assessed to be marked as "May contain", this declaration is also stated in the article text, the labels and specifications alike with: *May contain: + allergen NAME*. The analyzed values themselves are not given and only passed on at the customer's request and are no longer recorded in the analysis log.

7. Analyses



After having run out several hundreds of analyses and assessments of possible Allergen intakes, we decided to perform further analyses for affected product only in monitoring for the products involved. Further analyses could be run in case of acute indications.

In addition, it is pointed out that natural products always carry the risk of unintentional entry of allergens and these cannot be excluded 100%. A disclaimer that our analysis data does not replace the customer's mandatory incoming goods inspection is also included in the analyzes.

7. Updating the data

The risk assessment is continuously supplemented with analysis data. Should this result in knowledge that

- require immediate initiation of measures or
- require a change in the analysis cluster, CEO and QMO will be informed. Measures, that need to be initiated, are documented in the FB Action Plan.

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Appendix 1: Basic Relevant Data

Relevant allergen	Protein in %	Vital 3 Reference dosis	ALT/ALTS Reference dosis	Own Reference dosis
Gluten	100*	-	-	20
Mustard	23	0,05	0,5	0,05
Celery	17	0,05	-	0,4
Peanuts	22	0,2	2,0	0,2
Almonds	23	0,1	1,0	0,10

*) external Laboratory furnishes already Protein values for Gluten.