



European Snacks Association

European Snack Association position on allergen labeling

The European Snacks Association (ESA) is the voice of the European savoury snack industry. ESA exists to promote the development and understanding of savoury snacks at EU level. We provide a platform for sector-wide co-operation on a range of non-competitive issues. We aim to provide decision makers with the technical expertise, specialist knowledge and support which is necessary to ensure that EU policies and decisions that affect our sector are fact-based, practicable and deliver against expectations.

ESA member companies ensure that all of their products which contain major allergens or their derivatives as ingredients are labelled according to current legislation: Directive 2000/13/EC on labelling, presentation and advertising of foodstuffs and, as of 14 December 2014, Regulation 1169/2011 on the provision of food information to consumers.

Business to business sales are not included within this legislation, however members also recognise their responsibility to ensure allergen information is available to their own clients to enable them to fulfil their legal obligations.

ESA members recognize that the unintended presence of small amounts of certain allergens, which are not part of a product's formulation and which may be present as a result of manufacturing or other operations, can pose an allergenic risk to some consumers.

ESA members are of the view that in applying precautionary 'may contain' labelling, a risk-based approach should always be taken. We believe that currently applied best practices for the management of major allergens have dramatically decreased risks for allergic consumers. Therefore precautionary allergen labelling should only be used where a thorough risk assessment has demonstrated that there is a real risk of a significant, but unavoidable, amount of allergen being present in the finished product arising from cross-contamination, either within the ingredient supply chain or else from other manufacturing operations.

We believe that failure to apply a thorough risk assessment approach when dealing with the potential for unintended allergenic contamination leads to increased use of 'may contain' precautionary labels. This is not to the advantage of consumers as it results in reduced amounts and choices of foods that allergic consumers can choose from, and undermines the principles of food safety.

Rue des Deux Eglises 26, B – 1000, Brussels, Belgium. Tel: +32 (0)2 229 2155 Fax: +32 32 (0) 2 218 1213
6 Catherine Street, London, WC2B 5JJ, United Kingdom. Tel: +44 (0)20 7420 7220 Fax: +44 (0) 20 7420 7221

E-mail: info@esa.org.uk Web: www.esa.org.uk



European Snacks Association

We understand that in the context of Article 36.3a of Regulation 1169/2011 on the provision of food information to consumers, the Commission is obliged to develop rules on 'precautionary allergen labelling' (i.e. the provision of information on the possible or unintentional presence of substances and/or products causing allergies).

While developing the rules on precautionary allergen labelling we call on the Commission:

- to harmonise and agree a risk-based approach to quantitative risk assessment;
- to ensure that EFSA scientific opinions are used as the foundation for its approach;
- to assess emerging research concerning thresholds;
- to consider approaches already developed in other parts of the world, which are proven to be efficient and effective;
- to support 'may contain' labelling that continues to list the specific tree nut or ground nut. This is for the benefit of individuals who can be allergic to ground nuts only, a specific variety of tree nut only, several specific tree nuts or any combination of ground nuts and tree nuts;
- to consult on draft proposed rules with association(s) representing the interest of allergy sufferers such as EFA, the European Federation of Allergy and Airways Disease Patients' Association and manufacturer organizations.

European Snacks Association, October 2013