

- Criteria for allergy-friendly food products

### Background

Allergies have many triggers. Common triggers are foods that may contain various allergens. For people with food allergies, it is therefore especially important that the product ingredients are listed in detail and that the legally imposed limits are observed.

Some people with allergies only have to avoid individual allergens, such as celery or milk. For these people, the food is ideally labelled as “free from” the particular allergen to which they react. Other people with allergies may have problems with several allergens at once. This is why they require comprehensive labelling of the ingredients on the product.

The ECARF Seal of Quality offers both allergy groups practical specifications on allergy-friendly foods, either with the label “free from” or according to “extended labelling” criteria.

While it is important to avoid allergenic substances in the food itself, it must also be ensured that the given foods have not been unintentionally exposed to allergens upstream in the production process.

The ECARF Seal of Quality certifies foods that are produced with proven, effective allergen management.

**Allergen management includes:**

- Production
- Declaration
- Control

### 1. Production

Foreign substances such as allergens can also enter food products unintentionally. This may occur when raw ingredients already contain undeclared ingredients or when various raw ingredients are transported together, for example.

Allergenic contamination can also occur if the same production equipment is used for different foods in the manufacturing process, such as in the production of chocolate with and without nuts. Unintentional allergenic contamination can be prevented through effective allergen management.

**This includes:**

- Monitoring the raw ingredients
- Monitoring the manufacturing process
- Structured employee training

### 2. Declaration

The law states that 14 allergens, regardless of the quantity used, and all other ingredients whose content is higher than 2% of the food product, must be declared. Food products bearing the ECARF Seal of Quality are either “free from” any of the 14 allergens subject to declaration or meet the extended labelling requirements:

#### 2.1 “Free from”

The consumer-friendly “free from” label allows a consumer to see at a glance whether a specific allergen of concern to him or her is not included in the product. Manufacturers of foods bearing the ECARF Seal of Quality guarantee that the product does not contain individually specified allergens.

Manufacturers

- Must prove that these selected allergens are present in the product at a level of no more than 10 mg per kg of food or are below the technically feasible detection limit,
- List these allergens in a clearly legible manner on the product packaging and declare the product as “free from” these substances.

#### 2.2 Extended labelling

Food manufacturers list the ingredients of the food product with ingredient labelling that provides as much detail as possible. In addition to the standard indication of trace amounts, the product label should provide assurance that they are below a concentration of 0.5 mg per 100 g as follows. In order to provide the consumer with reliable information, the product must note on the label that it may still contain allergens in trace amounts but that these are present at a very low concentration.

The following is then declared in the ingredient list itself:

“Ingredients in accordance with statutory regulations” and below it the note: “May also contain traces of the following allergens (*list here, e.g. hazelnut*). However, our quality management ensures that they are limited to less than 0.5 mg of protein per 100 g of the product. If you have any further questions, please contact our consumer service (*contact details*).”

Manufacturers holding the ECARF Seal of Quality for certified food products

- Comply with ingredient labelling as required by law. Unlisted ingredients are only present at a level of less than 2%.
- Declare additional potentially allergenic ingredients beyond the legally required mention of allergens, even if these make up less than 2% of the food.

### 3. Control

In order to prevent allergenic contamination, the allergen content of the final products are regularly monitored by an independent institute. In general, this monitoring is carried out at least twice a year or in accordance with

the product type and production process or in the event of any changes made to the product or production process.

#### 4. Disclaimer

In many cases, manufacturers are able to reliably detect even very small quantities of substances in individual products, or even label them “free from”. However, this is not an absolute guarantee. Food products that are actually allergen-free may be contaminated at extremely low levels because the chemical detection methods for very small quantities have not yet been optimised in every regard. Minor fluctuations in product quality can therefore only be excluded to the extent permitted by the available chemical and technical detection methods.

### 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)

- **Cereals containing gluten:**  
wheat, rye, barley, oats, spelt, Khorasan wheat or their hybrid strains and products made from them
- **Nuts:**  
almond, hazelnut, walnut, cashew nut, pecan nut, Brazil nuts, pistachios, macadamia nuts and products made from them
- **Eggs** and egg products
- **Peanuts** and peanut products
- **Soya** and soya products
- **Mustard** and mustard products
- **Crustaceans** and crustacean products
- **Fish** and fish products
- **Milk** and dairy products (including lactose)
- **Celery** and celery products
- **Sulphur dioxide and sulphites** at a concentration higher than 10 mg/kg or 10 mg/l, labelled as SO<sub>2</sub>
- **Sesame seeds** and sesame seed products
- **Lupin** and lupin products
- **Molluscs** and mollusc products

#### Additional declarations

- **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**