Swedish Food Sector Guidelines For:

- **Management and labelling of food products with reference to**

Allergy and Intolerance

English version, August 2005

Contents

Summary

The purpose of this document is to support food safety work, to facilitate compliance with current applicable legislation and to provide guidelines for how “may contain” labelling can be made uniform and applied restrictively. The aim is to help consumers with allergies and intolerance in their daily choice of foods.

The document is based on the list of allergens found in Directive 2003/89/EC of the European Parliament and of the Council of the European Union and provides also an overview of current legislation in the field. A description is given of the prevalence of allergy and food intolerance and how these reactions manifest themselves.

The document provides concrete advice to all actors in the food chain and covers all steps from raw materials to consumption of the final food product, as well as training and supervision of personnel. Labelling aspects are examined on the basis of the new and more stringent requirements of EU labelling rules. The guidelines presuppose that attention is also paid in the regular quality work to substances that cause allergy and intolerance.

The document has been supplemented with checklists for the various specific parts of the food chain, including a list of actions to be taken if, despite all safety measures, a consumer should experience a reaction.

1. Introduction

These guidelines have been developed by the Swedish Food Retailers Federation (*Svensk Dagligvaruhandel*) and the Swedish Food Federation (*Livsmedelsföretagen, **Li***) in cooperation with the National Food Administration (*Livsmedelsverket*) and Swedish Coeliac Society (*Svenska Celiakiförbundet*). The Swedish Asthma and Allergy Association (*Astma- och Allergiförbundet*) has also taken part in the process, but does not accept "may contain" labelling. The "Food Industry Guide to Allergen Management and Labelling" of the Australian Food and Grocery Council has been used as a basis for these guidelines.

1.1 Scope

The guidelines are intended for persons and businesses that manufacture, package, distribute, sell, serve or otherwise handle raw materials, ingredients and final food products for the Swedish market.

The purpose of the guidelines is to support food safety work, to facilitate compliance with current applicable legislation and to provide guidelines for how "may contain" labelling can be made uniform and applied restrictively. The aim is to help consumers with allergies and intolerance in their daily choice of foods.

The term *allergens* refers in this document to allergens and substances that may cause allergy, intolerance and other adverse reactions.

1.2 Current legislation

Current legislation applicable to the food sector can be found on the National Food Administration's website, see www.slv.se.

According to EC Directive 2003/89/EC,[1] the following ingredients and products thereof must always be declared in the ingredient list:

- Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, kamut or their hybridised strains) and products thereof,
- Crustaceans and products thereof,
- Eggs and products thereof,
- Fish and products thereof,
- Peanuts and products thereof,
- Soybeans and products thereof,
- Milk and products thereof (including lactose),
- Nuts, i.e. Almond (*Amygdalus communis L.*), Hazelnut (*Corylus avellana*), Walnut (*Juglans regia*), Cashew (*Anacardium occidentale*), Pecan nut (*Carya illinoensis (Wangenh.) K. Koch*), Brazil nut (*Bertholletia excelsa*), Pistachio nut (*Pistacia vera*), Macadamia nut and Queensland nut (*Macadamia ternifolia*) and products thereof,
- Celery and products thereof,
- Mustard and products thereof,
- Sesame seeds and products thereof,
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2.

According to National Food Administration legislation (SLVFS 1996:6 §15), food premises and their equipment and fittings must be kept in good running order and cleaned regularly so that foods handled in the premises are not negatively affected. This cleaning must include

[1]Comment: see National Food Administration legislation on labelling and presentation of foods (LIVSFS 2004:27).

elements motivated from a food hygiene standpoint, to minimize the risks for persons who are allergic or otherwise sensitive to particular ingredients in foods.

According to National Food Administration legislation on supervision of the food sector (SLVFS 1990:10), those who handle food in their profession must *"identify the steps of their work that are critical from a food hygiene standpoint and apply the necessary safety procedures to eliminate potential risks."* This work should be based on HACCP principles (Hazard Analysis and Critical Control Points). The National Food Administration expands on this on page 3 of their sector guideline information (*Information om branschriktlinjer*) as well as in other documentation, see www.slv.se.

Contamination refers in this context to unintentional cross-contact with allergens that may cause adverse reactions.

Fact box: Excerpt from the National Food Administration brochure on self-regulation with respect to food safety and quality (*Egentillsyn ger trygghet och kvalité).*

Basic requirements
Establish procedures to create good general hygiene conditions:
- Training in food hygiene.
- Personal hygiene must be good.
- Only water fit for human consumption is to be used.
- Insect and animal pests are to be controlled effectively.
- Cleaning of equipment, premises and transport equipment and facilities must be carried out regularly.
- Temperature of foods and premises must comply with applicable limits.

HACCP
A Hazard Analysis and Critical Control Points plan is a system for identifying, evaluating and managing hazards that are critical for food safety.
1. Identify hazards that can exist in production (establish flow chart for every product category). Where can the hazards be found in production? Where in the process can these hazards be controlled?
2. Determine critical control points.
3. Set limits for the critical control points.
4. Establish a system for monitoring each critical control point. Examples can include measurement of temperature and time.
5. Determine corrective measures if the critical limits are exceeded.
6. In addition to systematic monitoring, use tests and evaluations to verify (control) that the system is working.
7. Establish documentation procedures.

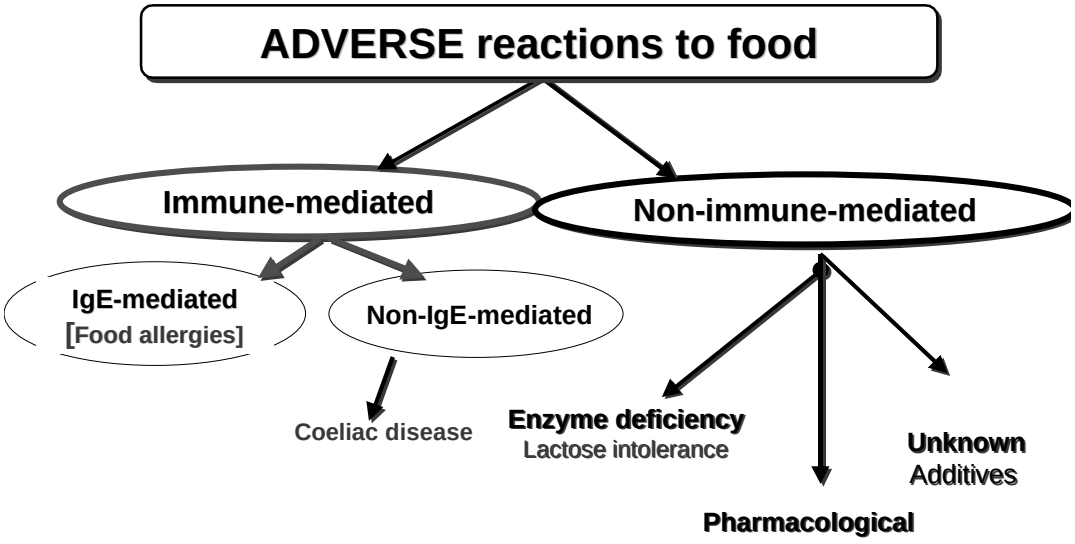
1.3 The consumer's expectations

Consumers expect and demand that everyone who handles foods has the knowledge and insight required to supply safe foods of high quality.

2. Adverse Reactions to Food - Allergy and Intolerance

Adverse reactions to food include immune-mediated and non-immune-mediated reactions. In the case of an immune-mediated response, IgE antibodies or specific cells may be involved. IgE--mediated reactions are known as *food allergies*.

Non-immune-mediated responses include enzyme deficiencies, such as lactose intolerance, pharmacological reactions, and responses that arise from as yet unknown mechanisms.



2.1 Immune-mediated reactions

Reactions mediated by IgE antibodies – Food Allergy

Prevalence. Food allergies affect a small proportion of the population. In some cases, an allergic reaction can be life-threatening or fatal. It is generally estimated that only 1-2% of the adult population and 5-8% of children suffer from true food allergies. Many children outgrow their allergies, such as those to milk and eggs, by the age of 5-7 years. Other allergies, e.g. to fish and peanuts, tend to persist.

The occurrence of allergies is determined by complex interactions of exposure factors and personal susceptibility of the exposed individual. Children born in allergic families have a greater risk of becoming allergic themselves. Most allergies begin in childhood, but allergy onset can also occur later in life. Many people develop pollen allergies in their teens. In connection with this, allergies to foods such as hazelnuts, almonds, apples and raw carrots often also appear. The actual number of adults with allergies is therefore significantly higher, figures in the range of 15-20% are reported. A considerable proportion of adults therefore avoid certain foods because of pollen-related food allergies.

Mechanisms. In the case of food allergy, an immunological response involving *IgE antibodies* occurs. This is a two-step process, where an individual must first be exposed to a particular protein in order to develop these antibodies. Once the individual has become sensitized to a particular allergen, he or she may develop symptoms upon re-exposure.

Practically all known food allergens that can cause an immunological reaction are proteins. Allergenic proteins are normally heat resistant and withstand food manufacturing processes and are unaffected by low pH and enzymes in the gastrointestinal tract.

Symptoms. Symptoms of an allergic reaction can arise within a few minutes or appear several hours after ingestion of the offending food. Eczema and other skin manifestations can appear days after consumption of the offending food. A small number of people are so sensitive that they experience a reaction from the mere smell of a food, e.g. fish or peanuts.

The symptoms of an allergic reaction can range from mild to severe, with most individuals suffering only a few of the many possible symptoms, which include:

- respiratory problems (rhinitis, conjunctivitis, asthma, breathing difficulties, swelling of the lips, mouth and throat),
- gastrointestinal problems (nausea, stomach pain, vomiting, diarrhoea),
- skin problems (hives, itching, dermatitis, eczema).

In rare cases, a more severe systemic reaction may occur, leading to a sudden drop in blood pressure, severe constriction of the airways, a generalized shock reaction and multiple organ failure. This is known as *anaphylactic shock* and can lead to death within minutes if not treated. Although only a small number of people with food allergies are at risk of such serious reactions, there are nevertheless many documented cases of death resulting from accidental ingestion of an offending food.

Offending foods. It is estimated that the majority of all food allergies are to proteins in common foods such as milk, eggs, fish, crustaceans, legumes (e.g. peanuts, soybeans, peas, lupin seeds), nuts (e.g. hazelnuts, walnuts, pecans, cashews, pine nuts, pistachios, macadamia nuts, almonds, apricot kernels), seeds (e.g. sesame seeds, sunflower seeds, poppy seeds, mustard seeds) and cereals (wheat, rye, barley, oats), and corn and buckwheat. However, many other foods can also cause allergies, though reactions to these are less common. Due to many serious reactions to celery, reported in particular from Central and Southern Europe, celery is included among the foods that must always be declared. For examples of other allergens, see Appendix 1.

Non-IgE-mediated reactions

Coeliac disease (gluten intolerance) is an immune-mediated disease that does not involve IgE antibodies. In coeliac disease, a local immunological response to specific cereal proteins (gluten protein or gluten equivalents) occurs in the small intestine. This causes an inflammation and damage to the small intestinal mucosa, which can lead to, among other things, malnutrition. In coeliac disease, products containing wheat, rye, barley and oats[2] must be excluded. The diet can be based on cereals with reduced levels of gluten, such as wheat starch, and naturally gluten-free products like corn, rice, millet or buckwheat. Symptoms may appear immediately after ingestion, but usually take longer to appear. Normalization of an injury to the small intestinal can take up to 6 months. In Sweden, the prevalence of coeliac disease is estimated to be 1%.

[2] The findings of a number of clinical studies suggest, however, that oats can be consumed by most people with coeliac disease. See the National Food Administration and Swedish Coeliac Society websites, www.slv.se and www.celiaki.se, respectively.

2.2 Non-immune reaction

Food allergy and coeliac disease should not be confused with non-immune-mediated reactions. The latter include lactose intolerance, which is caused by a deficiency of lactase, an enzyme needed to digest lactose (the sugar in milk). Major symptoms of lactose intolerance are stomach pain, diarrhoea and flatulence. Individual sensitivity to lactose varies, but most lactose intolerant people are able to ingest small amounts of lactose. It is estimated that 3-5% of native Swedes are lactose intolerant. In the non-native Swedish population, as well as in other parts of the world, lactose intolerance is more common. Lactose intolerance should not be confused with milk allergy. Allergy to milk is an IgE immune-mediated response to the proteins in cow's milk and can cause severe reactions, even anaphylaxis. Lactose intolerance does not provoke such severe reactions. In the case of milk allergy, all dairy products and products containing milk protein must be avoided.

A non-allergic person can experience symptoms similar to an allergic person without the immune system being involved. An individual's sensitivity to certain substances is considered pathologically elevated if a reaction occurs in one or more of the body's organs. Certain food additives, such as dyes and preservatives, can cause this type of non-immune reaction.

People with asthma can have a sensitivity to sulphites. Sulphites are used as preservatives and antioxidants in food products. As sulphites are volatile, their use in high concentrations and particularly in acidic foods, where the sulphite is easily released in gaseous form, may cause problems. Asthma is a chronic inflammatory condition of the airways and can lead to serious breathing difficulties for the person affected.

3. Allergen Management

Special attention is required to control potential allergy risks. The recommended method for controlling the risk of allergen contamination is through establishing a HACCP program. This includes evaluation of the hazards associated with every step of the entire chain, from receiving raw materials to consumption of the finished product. This evaluation must be done by each actor for their part of the food chain.

Allergen handling instructions also apply to other ingredients that can cause sensitivity reactions, see Section 1.2 and Appendix 1.

Accidental exposure

Many foods contain ingredients that are known allergens, but allergens can also appear in foods through unintentional exposure. Awareness of the following points is essential in order to minimize the risks for unintentional contamination:

- The company's continuous training of employees should always cover education about allergens.
- Allergen risks should be observed in every part of the chain, from purchasing, receiving, handling and storage of raw materials and finished product, to consumption.
- When developing new products and recipes, every raw material should be carefully identified and evaluated. Use only well-documented raw materials.
- Complete product specifications should be prepared. Note that allergens can sometimes be present as a sub-component of a raw material, additive, etc., e.g. as a carrier in a seasoning mix.
- When developing products, allergens in the recipe should be evaluated.
- When conducting trial runs, the introduction of new allergens on the production line should be avoided.
- Good procedures should be established for using rework (internally recycled product), e.g. crushings from dried pasta *with* egg. It is essential that the rework is used in the right product and not in other products, for example, in this case pasta *without* egg.
- Premises, equipment and order of handling should be planned to prevenet contamination between products, production lines and work tools.
- Good cleaning procedures should be established in order to remove all allergenic substances from the equipment, storage areas and other premises where foods are handled.
- Procedures should be in place to ensure that the right product is packed in the right packaging. The ingredient list on the package should always reflect the actual contents of that product.
- Labelling of raw materials, semi-finished goods and finished product should be such that there is no risk for mix-ups. Keep in mind that contamination can also occur after manufacturing, for example, in handling of semi-finished products that have not yet been put in their final packaging.
- When necessary, the food should undergo post-production controls to confirm that no accidental exposure to allergens has occurred.
- When changes are made to a product, production or other handling procedures, all of the above points should be re-examined.

Food manufacturers and food handlers should stay abreast of new information on allergens, e.g. in the form of guidelines and recommendations from sector organizations and authorities. As new knowledge becomes available, it should be evaluated at once based on the circumstances of the handling in question, after which the necessary measures should be taken.

3.1 Training and supervision of personnel

Employees must understand the risks of allergens and the consequences of accidental ingestion. Training employees who handle food constitutes the basis for success. Employees must be encouraged to take immediate action if contamination is suspected.

Procedures for control and prevention of contamination must be visible or readily available for all employees in the work area.

The procedures should contain information about:

- Good hygiene, for example, rules regarding clothing, hand-washing and hand contact with foods.
- Cleaning of premises, equipment and tools.
- Handling of rework materials, for example, the conditions under which such product may be used.
- Waste management, for example, how waste should be labelled and kept separate from rework.
- Situations where potential cross-contamination can occur between products, production lines or equipment, and the employee's responsibility for preventing this.
- Production order and handling, as well as how this order is decided.
- Labelling of raw materials, semi-finished goods and finished products.

Internal compliance with instructions and procedures for control of allergen risks should be ensured regularly by trained internal auditors.

3.2 Product development and new recipes

The starting point for all food production is ensuring that complete product specifications are available.

In product development, the ingredients and manufacturing procedures should be looked at from an allergy perspective. The people responsible for development of products and recipes must have sound knowledge of the risks for people with allergies and other intolerance. Allergenic ingredients should only be used if they are necessary for the product.

Avoid the introduction of new allergens into well-known products and different package sizes.

It is essential that the people in charge of production are given ample advance notice when new ingredients are to be used. Appropriate preventive product safety measures can then be taken, such as reviewing documentation, recipe collections and labelling procedures for all stages of the process. Plan the production order and inform all employees of the upcoming changes.

See also Section 4.9, *Recipe changes*.

3.3 Raw materials and ingredients – Product specifications

Products can be contaminated with allergens via improper handling of raw materials by the supplier. Raw material suppliers should have sufficient expertise, use HACCP, and fulfil allergen control procedures according to these guidelines.

When purchasing and receiving raw materials, the manufacturer should consider the risk of contamination prior to the goods entering the premises. Information should be requested from raw material suppliers to identify raw materials and products that may be allergenic. This documentation is required since some ingredients are easy to identify as potentially allergenic, while others are not as obvious. Manufacturers and purchasers can also carry out supplier audits in order to identify contamination risks.

When it comes to allergens and other risks, good contact and relations between raw material suppliers and manufacturers promotes good product safety.

Allergenic raw materials, ingredients, semi-finished products, etc., should be identified upon receipt and, if possible, kept separate from each other and from other foods. This is especially important when handling unpackaged foods and ingredients. Clear labelling reduces the risk for mix-ups and contamination.

At times there may be a need for securing access to several alternative ingredients that can be substituted in a product, e.g. alternative seasonings and raising agents with carriers. In some cases, a particular ingredient may need to be purchased from different suppliers. The manufacturer should identify which ingredients and which suppliers can be accepted. Alternative ingredients should be handled in exactly the same way as standard ingredients and the required product specifications and documents should be requested to ensure that no allergenic raw materials are used accidentally.

3.4 Premises and equipment

Premises should be designed to facilitate allergen control. It is preferable to have separate equipment and work tools to clearly distinguish between those used for products that contain allergenic substances and products that do not. Manufacturers with multiple production units should consider separating products or production steps to reduce or prevent contamination.

3.5 Manufacturing

In order to minimize the risk of unintentional allergens and contamination, HACCP principles and good manufacturing practices should be used.

When planning production, attention should be paid how one can best minimize the risk for contamination between different raw materials and products. The process should be designed to minimize the amount of equipment exposed to allergenic substances. The manufacturer should identify where in the work area, equipment and tools contamination risks exist. A monitoring system must be in place to prevent contamination. When handling products with allergenic substances, separate work tools and equipment are preferable. If the same equipment must be used, where possible, product containing allergenic substances should be produced last.

Effective cleaning procedures are of particular importance when allergens are present. This can often require the disassembling of equipment for manual cleaning. Controls must be carried out after cleaning to confirm that no allergens remain.

3.5.1 Rework – Internally recycled product

There should be procedures for the handling of rework in production. Allergen-containing rework should only be used in product where that allergen is already present. How and when rework may be used should be documented.

Rework materials must be correctly labelled to ensure correct identification and handling. There must be a procedure for tracking the rework materials used through to the finished product.

3.5.2 Labelling for handling and production

There should be control procedures to ensure proper labelling of raw materials, semi-finished goods and products. When choosing packing materials of the same or similar appearance, e.g. for different flavour variants, it is especially important to ensure that the correct packaging is used. In this context, a checklist to be signed by the person responsible is recommended.

3.5.3 Design of equipment and production line

When choosing equipment, one should assess the ease with which the equipment's outer surfaces and internal parts can be cleaned. To facilitate cleaning and reduce the risk of contamination, production lines that cross or are too close to one another, should be avoided.

3.6 Cleaning

Documented cleaning procedures are essential to ensure that effective and proper cleaning is performed. Adequate time must be allocated for cleaning. Hidden areas of the equipment must be identified and dismantling of equipment may therefore be necessary. Failure to clean properly can lead to a build-up of raw material- or product residue inside the equipment.

In order to guarantee effective cleaning, proper cleaning equipment and documented procedures are needed. A visual inspection should always be conducted. In some cases, sampling of the production line for analysis, e.g. through documented cleaning tests, may be required in order to assess the cleaning results. Note that one negative test result is never a guarantee that the equipment is thoroughly cleaned.

To control that the equipment has been properly cleaned, analyses can be conducted to test for the presence of allergens. Normally, the presence of such allergens is determined using immunological techniques, for example, ELISA[3], based on specific antibodies. The analysis should be performed by personnel trained in the technique.

Detection limits for different allergens vary. Note that a test result of "not detected" is never a guarantee that it is completely allergen-free, but it is an indication of good cleaning routines. If allergens can be detected, however, it is proof of inadequate cleaning.

A list of manufacturers who produce allergen test kits can be found on the National Food Administration website, www.slv.se.

[3] Enzyme Linked Immuno Sorbent Assay

3.7 Packaging and post-production controls

Production planning includes the order in which different products are manufactured and packaged. Special attention must be paid when the production of bulk volumes takes place at one location and the packaging of the finished product at another. In such cases, the order of packaging must be designed to reduce the risk of contamination by allergens and to include good cleaning routines.

When preparing package labels, it is necessary to ensure that the text reflects the actual recipe ingredients. If a recipe change occurs and a new allergen is added, new packaging materials must be used immediately. It is also essential to ensure that the product is packed in the appropriate packaging. When choosing packaging of the same or similar appearance, such as different flavour variants, it is especially important to ensure that the right packaging is used.

Only one list of ingredients is permitted, and this must be complete and clear. Affixing an additional label or sticker when individual ingredient changes have been made is not acceptable.

Unpackaged finished product containing allergens should be kept separate from products that do not contain allergens. Finished products containing allergens should be securely packaged so that they can not contaminate other products.

3.8 In-store handling

As products containing allergens are handled in the store completely or in part without packaging, for example, at service counters manned by shop personnel, handling should follow these guidelines.

Self-serve areas where the consumer him/herself handles unpackaged food products can never be completely safe from an allergy standpoint, but the risk of contamination should nevertheless be reduced to a minimum.

4. Labelling

4.1 Allergenic ingredients that must be labelled

According to EC Directive 2003/89/EC,[4] the following allergenic ingredients must always be stated in the list of ingredients:

- Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, kamut or their hybridized strains) and products thereof,
- Crustaceans and products thereof,
- Eggs and products thereof,
- Fish and products thereof,
- Peanuts and products thereof,
- Soybeans and products thereof,
- Milk and products thereof (including lactose),
- Nuts, i.e. Almond (*Amygdalus communis L.*), Hazelnut (*Corylus avellana*), Walnut (*Juglans regia*), Cashew (*Anacardium occidentale*), Pecan nut (*Carya illinoensis (Wangenh.) K. Koch*), Brazil nut (*Bertholletia excelsa*), Pistachio nut (*Pistacia vera*), Macadamia nut and Queensland nut (*Macadamia ternifolia*) and products thereof,
- Celery and products thereof,
- Mustard and products thereof,
- Sesame seeds and products thereof,
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2.

The list will be revised as necessary. See also Appendix 1 and the ***Li*** labelling handbook, see www.li.se.

4.2 Extent of labelling

The allergens listed in Section 4.1 must always be declared in the list of ingredients when they are included as:

- ingredients, i.e. raw materials or additives, including flavourings,
- ingredients in a compound ingredient, including additives that have no function in the finished product,
- processing aids, i.e. substances used during manufacturing that may unintentionally remain in the finished product,
- solvents or carriers, e.g. for additives, seasoning mixes and flavouring substances.

All ingredients in the ingredient list should be declared in descending order by weight, and the list should begin with a heading that uses the word “ingredient” (Swedish: *ingrediens*).

Ingredient lists must be given on foods packaged for the consumer. For other packaged foods, e.g. certain industrial raw materials, an exception may be granted where the ingredient list can be provided in a separate document. See LIVSFS 2004:27 on labelling and presentation of foods (www.slv.se, subheading *Swedish Food Legislation*).

Note that all ingredients of rework are also ingredients in the finished product and must be stated in the list of ingredients.

[4] Comment: see LIVSFS 2004:27.

4.3 Complexity of labelling

Via documentation, manufacturers know from which raw materials the ingredients they use originate. The comprehensive labelling requirements given in Section 4.2 require manufacturers to be responsible for identifying all ingredients, components in compound ingredients, additives and processing aids used in their products.

Additives, seasoning mixes, processing aids and vitamins are often mixed with carriers or solvents that may contain one of the allergens that must be declared, such as wheat starch or lactose.

All components of a compound ingredient must be stated. Exceptions may only be made if the compound ingredient is recognized in EU legislation and makes up less than 2% of the finished product. In this case, it is sufficient to state the name of the compound ingredient followed by additives and possible allergens, see EC Directive 2003/89/EC.
For example, chocolate may contain hazelnuts, an allergen that always must be declared.

Suppliers of compound ingredients, additives, processing aids, etc., are responsible for providing their customers with information on any allergens listed in Section 4.1 present in their products, see also Appendix 1.

There may be ingredients manufactured from allergens listed in 4.1, in which the allergen is no longer present. The European Commission will continuously decide on which ingredients can be excluded from the list, see Appendix 2.

Food producers and food handlers should stay abreast of new knowledge on allergens as it becomes available.

4.4 How to declare allergens

EC Directive 2003/89/EC states that allergens should be indicated "with a clear reference to the name of this ingredient." This means that starch produced from wheat must be declared as "wheat starch", and lecithin produced from soy as "emulsifier: soy lecithin" or "emulsifier E322 (from soy)".

When an allergen is present in another ingredient (see Section 4.3), this can be stated as "chocolate (contains hazelnuts)".

Example: **Vanilla ice-cream cone with strawberry jam and bits of chocolate**
Ingredients: Skimmed milk, strawberry jam 30% [strawberries, sugar, water, dextrose, stabilizer (E440), citric acid (E330)], waffle cone [wheat flour, water, sugar, vegetable shortening, salt, emulsifier (soy lecithin)], sugar, vegetable shortening, chocolate coating [vegetable shortening, sugar, cocoa powder, emulsifier (soy lecithin)], glucose syrup, chocolate 1.5% [with ground hazelnuts and emulsifier (soy lecithin)], emulsifier (E471, soy lecithin), stabilizer (E407), flavouring (contains lactose).

4.5 "Free from" labelling

In order to include statements such as "gluten free" or "milk free" in their labelling, products must meet the provisions for foods for particular nutritional uses (SLVFS 2000:14) and be registered with the National Food Administration, according to §12 of noted legislation. The statement must however be relevant, e.g. margarine can not be labelled "gluten free".

Among the requirements for using "… free" labelling is that production take place under specially controlled conditions. The supervisory authority shall have conducted an evaluation of the company's ability to ensure "… free" production and issued a statement to this effect.

There are, for example, currently products registered that use the labelling *milk free, soy free, egg free, gluten free,* or alternatively *naturally gluten free, lactose free* and *lactose reduced*. One may also register products that are free of allergens other than those listed above.

On registering products with the National Food Administration, see www.slv.se.

4.6 When can "may contain" labelling be used?

Labelling that emphasizes a risk of contamination may never be used as an excuse for poor controls and hygiene management. If procedures are not established or not applied, wording such as "may contain traces of peanuts" is not helpful for the consumer. It can instead lead to the consumer taking a risk and eating the product, or avoiding a product that could be safely eaten by that consumer. Using wording to this effect can also create problems for the manufacturer, as it can be interpreted that the product is free from all other allergens.

"May contain" labelling should only be used as a last resort when the risk for contamination by each allergen in a specific production line is:

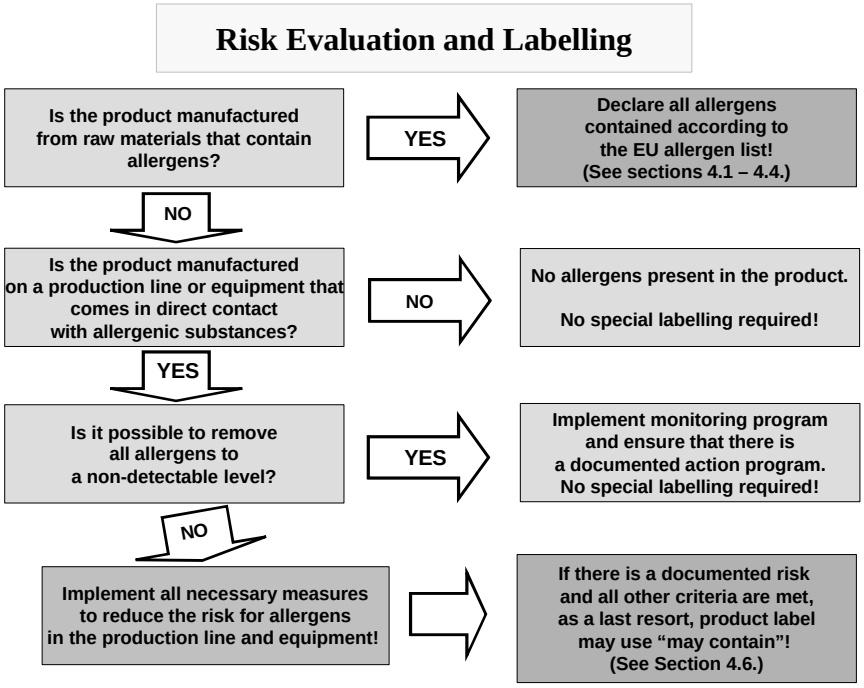
1. Uncontrollable, i.e. the ability to ensure the entire process is considered impossible, e.g. due to manufacturing in part occuring in systems that can not be cleaned with water.
2. Sporadic, e.g. if the allergen is detected sporadically after product changes.
3. Documented through cleaning controls, test results, or substantiated consumer reaction.

Only when all of these conditions are met can "may contain" be used in the labelling!

Labelling should be designed for each specific allergen and group names should be avoided. For example, "may contain traces of nuts" should not be used, but each specific variety of nut should be stated.

The National Food Administration states that cleaning must meet certain standards. However, if there still remains a risk of allergen residue in the product, according to the points above, "may contain" labelling may be applied. Such labelling should be done in consensus with the supervisory authority who also follow up that adequate measures have been taken to justify this labelling.

The following flow chart shows the decision steps in assessing how a product's label should be designed. A decision to use "may contain traces of" in the labelling should always be based on a documented risk assessment, performed according to HACCP principles.



4.7 Alternative ingredients

According to EC Directive 2003/89/EC, ingredients that are of a similar type or mutually substitutable and constitute less than 2% of the finished product may under certain circumstances be declared in the form of "contains … and/or ...", e.g. if the composition has otherwise not been altered. However, this does not apply to additivies or the allergens listed in Section 4.1, see also Appendix 1.

4.8 Clear labelling on the package

The list of ingredients must be given adequate space on the package.

Labelling information must be *"easy to understand, clearly visible, legible and permanent"* according to (LIVSFS 2004:27). A clear and easily understandable ingredient list is of particular importance for people with food intolerance. The font type, print size and contrast between text and background is of great importance with respect to legibility.

Simple, linear fonts and contrasting colours for print and background are appropriate. Narrow or wide fonts should be avoided. An clear space surrounding the print improves legibility. If coloured print or background are used, the highest possible contrast should be sought. Keep in mind that the colours red and green, and blue and orange/red, are poor contrasts.

The size of print required for good legibility depends on the font type and contrast. A font size of at least 1.1 mm for lower case "o" is recommended. Some exceptions, such as in the case of small packages may be acceptable, with a minimum font size of about 0.9 mm used for lower case "o", but this requires a font type and contrast that will ensure good legibility.

4.9 Recipe changes

When making a recipe change or substituting one ingredient for another, the consumer should be clearly informed about the change in product content, especially if a new allergen

is introduced or a substitution has occurred. This can be done, for example, by writing “new recipe” on the front of the package.

If, for example, peanut flakes are used in place of almond flakes, the product’s packaging should clearly state that a change in ingredients has been made. Otherwise, there is a risk that a person who tolerates almonds, but not peanuts, may eat the product out of habit and suffer severe allergic shock (anaphylaxis). Making the change in the ingredient list is not enough, however, because consumers get used to relying on products they are able to eat and do not read every ingredient list every time they buy a product.

4.10 Other information – Product fact sheets

Manufacturers that provide allergen lists must recognize their responsibility to ensure that these lists are correct and that risk assessments are carried out. There must be quality systems in place to minimize the risk of contamination in these products. When preparing product fact sheets, it is of major importance that they state the ingredients a product *does contain* and not what the product *does not contain*. See also the ***Li*** labelling handbook, www.li.se.

Appendix 1. Examples of foods and ingredients that can contain allergens.

Examples of food and food ingredients that can contain allergens are given below. In addition to the allergens addressed in Section 1.2 of the food sector guidelines for *Management and Labelling of Food Products with reference to Allergy and Intolerance* (hereafter "Guidelines"), a number of additional allergens are included here. It is up to the individual company to evaluate, based on its regular product safety efforts, which of these additional allergens may need to be considered.

The table below serves as an appendix to the Guidelines and is not considered a complete list. Other information may need to be obtained. See also the latest versions of National Food Administration information brochures 1-11 on allergy and the National Food Administration website (www.slv.se).

The examples of products given in the table show that extreme care must always be taken to ensure the origins of substances such as proteins and carriers in flavourings, bouillon powder, colours and dyes, seasoning mixes, marinades, hydrolyzed protein and similar added ingredients.

Keep in mind, however, that even if an ingredient is not on the EU allergen list of food ingredients that must always be declared, the basic rule is that **all** ingredients used in the manufacturing must be stated in the list of ingredients (see Section 4.2 of the Guidelines, National Food Administration regulations and guides, ***Li'***s labelling handbook, etc.).

National Food Administration regulations regarding labelling and presentation of foods (LIVSFS 2004:27) imposes particular requirements on how the food ingredients in the table below should be declared.

Allergens according to EU list	Specification	Examples of products	Examples of foods and food ingredients that may contain these
Cereals containing gluten	Wheat, rye, barley, oats, spelt, kamut, and hybridized strains thereof.	Fibre, bran, sprouts, gluten, semolina, malt, oat gruel. HVP (hydrolyzed vegetable protein), wheat syrup, starch/modified starch, glucose syrup, malt extract (malt syrup), maltodextrin.	Sour dough, bread crumbs, pasta, cous cous, bouillon powder, potato products (treated with wheat flour), wort, seasoning mixes, corn flakes, roasted onion, soy sauce, confectionery (e.g. liquorice).
Crustaceans	Shrimp, crab, lobster, crayfish.		Imitation crab made from fish, soups, bouillon, concentrated stock, flavourings, sandwich fillings, salads, shellfish salads and stews.
Examples of molluscs that may need to be considered in addition to the EU list	Mussels, oysters, squid and octopus.		
Fish	Fish (all species).	Fish preparations. Fish gelatin, fish meal, fish protein.	Cured, smoked, pickled and canned fish, fish roe, fish bouillon, caviar, fish balls, anchovy-stuffed olives, marinades, steak sauces, sauces, seasoned pasta (e.g. chili pasta), liver paté, imitation crab made from fish.
Eggs		Whole eggs, egg yolks, egg whites. Egg albumin, lysozyme (E1105, preservative), lecithin (E322, emulsifier). Lecithin is produced mainly from soybeans and not from egg.	Pasta, noodles, liver paté, meringue, aioli, mayonnaise, bread crumbs, bread coating, potato flakes (treated with egg white), meatballs, cheese (with lysozyme), imitation crab made from fish.
Milk, including lactose		Cream, butter, buttermilk, skim milk, cultured and sour (fermented) milk products, e.g. acidophilus, curd milk, kefir, yoghurt, crème fraiche, whey cheeses. Butter oil, whey, whey powder, milk protein, casein, caseinate, lactoglobulin, lactalbumin. Milk sugar is the same as lactose.	All types of cheese, such as hard cheese, dessert cheese, processed cheese, fresh soft cheeses, cottage cheese, quark, enzyme-modified cheese, margarine cheese, garlic powder. Chocolate, meringue, nougat, bread crumbs, coconut milk, sausage, seasoning mixes (e.g. for crisps), margarine.

Allergens according to EU list	Specification	Examples of products	Examples of foods and food ingredients that may contain these
Peanuts		Peanut oil, peanut flour.	Peanut butter, satay seasoning, bouillons, sauces, pastry fillings, peanut flakes as a substitute for almond flakes in baked goods, sprinkles, confectionery, chocolate, marinades.
Soybeans		Soybeans, sprouts, soy flour, soy protein, soy concentrate, soy isolates, soy texturates, lecithin (E322), HVP (hydrolyzed vegetable protein).	Tofu, fermented products such as soy sauce, mushroom soy, tempeh, miso, imitation crab made from fish, bouillons, sauces, roasted onion, margarine, bread crumbs, chocolate, sausages, ground meat products, kebab, seasoning mixes, marinades, flavourings.
Examples of legumes that may need to be considered in addition to the EU list	Peas, beans, chickpeas, lentils, lupine, liquorice, fenugreek.	Pea fibre, pea protein, pea starch, lupin flour, locust bean gum/carob bean gum (E410), guar gum (E412), tragacanth (E413), acacia/gum arabic (E414), tara gum (E417).	Bread, cakes, ground meat products, liver paté, ice-cream, liquorice, curry (may contain fenugreek and other spices).
Nuts	Almond, hazelnut, walnut, cashew, pecan, Brazil nut, pistachio, macadamia nut/Queensland nut.		Nut paste, nougat, marzipan, almond paste, 'baking' paste. Chocolate, confectionery, pesto, granola and muesli, cookies, crackers, baked goods, bread, bread crumbs, Asian dishes.
Examples of "nuts" that may need to be considered in addition to the EU list	Apricot kernels, pine nuts.		
Sesame seeds	Sesame seeds.		Seasoning mixes, bread coatings, bread, granola and muesli, cookies, crackers, rice cakes, snack foods, dressings, bread crumbs, oriental sauces, tomato sauce, sushi.
Examples of seeds that may need to be considered in addition to the EU list	Poppy seeds, sunflower seeds, pumpkin seeds.		

Allergens according to EU list	Specification	Examples of products	Examples of foods and food ingredients that may contain these
Celery	Celery root, celery leaves (all parts of the plant).	Celery root, celery leaves, celery seeds.	Seasoning mixes.
Mustard	Mustard seeds (white, yellow, black).	Mustard seeds (white, yellow, black).	Mustard, mayonnaise, mustard sauces, dressings, seasoning mixes, breaded ham, pickled herring, pickled cucumbers.
Sulphur dioxide and sulphites at concentrations over 10 mg/kg or 10 mg/litre, expressed as SO_2			Wine, vinegar, vinegar-based pickling mixtures, potato products, dried fruit, canned crab.
Examples of other substances that may need to be considered			
Preservatives	Benzoic acid (E210), benzoic acid salts (E211-213), and benzoic acid esters (E214-E219).		Occur naturally in a number of wild berries (e.g. lingonberry, cloudberry). May be used in most foods that can be canned (see LIVSFS 2003:20).
Colours and dyes	Carmine, carminic acid (E120), annatto extract (E160b), azo dyes (E102, E110, E122-124, E128-129, E151, E154-155, E180).		According to EC regulations these may be used in most foods that may be coloured (see Swedish regulations LIVSFS 2003:20). This does not apply to azo dyes, however, which may only be used in certain foods. According to the Guidelines, azo dyes should be avoided on the Swedish market (see also www.li.se).
Fruits and berries	Pineapple, apricot, banana, kiwi, cherries, mango, melon, nectarine, papaya, peach, plum, pear, apple.	Flavourings.	
Seasonings	Paprika, cayenne, chili pepper, piri piri (of the capsicum family), pink peppercorns, anise, dill, fennel, coriander, caraway, cumin, lovage, parsley, nutmeg, peppermint, horseradish, cinnamon, garlic, vanilla.		Chili powder (seasoning mix), onion powder, garlic powder.

Appendix 2. Excerpt from Commission Directive 2005/26/EC.

ANNEX

List of food ingredients and substances provisionally excluded from Annex IIIa of Directive 2000/13/EC

Ingredients	Products thereof provisionally excluded
Cereals containing gluten	— Wheat based glucose syrups including dextrose (1) — Wheat based maltodextrins (1) — Glucose syrups based on barley — Cereals used in distillates for spirits
Eggs	— Lysozym (produced from egg) used in wine — Albumin (produced from egg) used as fining agent in wine and cider
Fish	— Fish gelatine used as carrier for vitamins and flavours — Fish gelatine or Isinglass used as fining agent in beer, cider and wine
Soybean	— Fully refined soybean oil and fat (1) — Natural mixed tocopherols (E306), natural D-alpha tocopherol, natural D-alpha tocopherol acetate, natural D-alpha tocopherol succinate from soybean sources — Vegetable oils derived phytosterols and phytosterol esters from soybean sources — Plant stanol ester produced from vegetable oil sterols from soybean sources
Milk	— Whey used in distillates for spirits — Lactitol — Milk (casein) products used as fining agents in cider and wines
Nuts	— Nuts used in distillates for spirits — Nuts (almonds, walnuts) used (as flavour) in spirits
Celery	— Celery leaf and seed oil — Celery seed oleoresin
Mustard	— Mustard oil — Mustard seed oil — Mustard seed oleoresin

(1) And products thereof, in so far as the process that they have undergone is not likely to increase the level of allergenicity assessed by the EFSA for the relevant product from which they originated.

Appendix 3. Food sector guideline committee members.

Marianne Jarl	Swedish Asthma and Allergy Association	www.astmaoallergiforbundet.se
Helena Svensson	Axfood Sverige AB	www.axfood.se
Anders Nilsson	Coop Norden Sverige AB	www.coop.se
Madelene Brogren	ICA Sverige AB	www.ica.se
Boel Östlund	***Li*** (Swedish Food Federation)	www.li.se
Ulrika Ehrhardt	***Li*** (Swedish Food Federation)	www.li.se
Ulla Fäger	National Food Administration	www.slv.se
Ingrid Malmheden Yman	National Food Administration	www.slv.se
Anders Lindström	Swedish Coeliac Society	www.celiaki.se
Helene Arrenfeldt	Swedish Food Retailers Federation	www.dagligvaror.se

1. Checklist for:
Product Developers

Purpose: To improve the safety of food handling.

To help consumers with allergies and food intolerance.

Requirements: To be aware that consumers expect and demand all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

If changes involving allergens occur in a product or changes are made to production, the procedures below should be re-examined in order to ensure that no mistakes occur.

Control Point	Comments	Yes	No	Note current routines and possible improvements
1. Hazard analysis – Risk assessment Is an allergy risk assessment based on HACCP principles carried out in the product development work? .	***Examples of problems:*** New allergens introduced in a factory without the risk for contamination of other products having been evaluated. New allergens introduced to products where the consumer does not expect them.			
2. Coordination - Cooperation Do product developers, production staff, purchasing staff, raw material suppliers, etc., coordinate efforts during the product development so that allergy risks are considered at each step of the production process – from purchasing to receiving, handling and storage of raw materials and the finished product?	A risk assessment must always be conducted when new products are being tested in order to avoid introducing new allergens to the production line and contaminating other products.			
3. Training Do the company's product developers receive ongoing training on allergy issues?	Employees must understand the risks of allergens, e.g. in order to minimize contamination of the product by allergens.			
4. Documentation of raw materials Are there procedures to ensure that only well-documented raw materials are used?	***Example of problem:*** The supplier has inadequate knowledge about allergies and food intolerance issues, and does not provide complete specifications for raw materials. Note that an allergen can sometimes be present as a sub-component of a raw material, additive, etc., for example, as a carrier in a seasoning mix.			

Control Point	Comments	Yes	No	Note current routines and possible improvements
5. Raw material specifications Are there raw material specifications for all ingredients in the product and other allergy information required according to EU's new labelling rules?	***Example of problem:*** Carry-over additives, processing aids, etc., derived from allergenic raw materials.			
6. Raw material suppliers Are there procedures in place to ensure that raw material suppliers are unable to change a recipe without prior approval of the company using the raw material?	***Example of problem:*** The manufacturer does not find out that the supplier has modified a recipe until after the fact.			
7. Alternative suppliers Are there procedures in place to ensure that another supplier can not be substituted for a raw material supplier without prior approval?	***Example of problem:*** A new raw material is introduced that involves a change in the ingredient list.			
8. Measures for suspected contamination Are employees encouraged to take immediate action in the case of suspected contamination, incorrect labelling, etc., and are there procedures on how information about this should be passed on?				

Control Point	Comments	Yes	No	Note current routines and possible improvements
9. New allergens When developing products, the addition of new allergens to the recipe of an existing product should be avoided. If this nevertheless occurs, are there procedures on recipe changes?	***Example of problem:*** Wrong raw material is used in the product. The risk for this can be reduced, e.g. by changing the product number of raw materials, intermediate products or the finished product.			
10. Customer information for new allergens If a new allergen is introduced to a recipe of an existing product, are there procedures on how to communicate this to customers?	When recipes are changed, "new recipe" or similar wording should be stated on the package. When selling unpackaged foods, this information can be provided in other ways, e.g. by a bulletin posted at the sales counter.			
11. Contracted manufacturing When a product is manufactured by another company, are there procedures for ensuring that the ingredient list is correct and that contamination of allergens is minimized?				
12. Allergen management systems Is there a quality system in place for the products stated, e.g. in an allergen list, that ensures there is no risk for unacceptable contamination?	***Example of problem:*** Allergen lists provided do not reflect the actual production situation.			
13. Sector agreement – Product fact sheets Is the sector agreement on product fact sheets from ***Li*** being followed?	***Example of problem:*** Person(s) responsible for product fact sheets are not familiar with applicable sector agreement.			

Control Point	Comments	Yes	No	Note current routines and possible improvements
14. Procedures for "trace of", "…free" Are there procedures to ensure that package labelling follows the existing rules, e.g. regarding "may contain traces of", "…free", etc.?	So-called "foods for particular nutritional uses" (…*free*) require additional quality assurance in production according to special rules. Such manufacturing and sales must be registered with the National Food Administration.			

Date: ……

Name of person who completed checklist: ……

Company name and address: ……

Go through your activities with the help of the checklist regularly. Take corrective measures. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
A. General points A.1 Are there procedures for handling product alerts? A.2 Are the procedures used and followed?	This is a general guideline and the company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distribution managers.	
B. Gather information B.1 Is the customer still sick? B.2 What product did the customer eat? B.3 What else did the customer eat? B.4 Does the customer have a known allergy or intolerance – to what? B.5 Tell the person you will get back to him/her.	If a customer is sick – suggest that he/she seek medical attention. Note the product name, size, "use by" date, date of purchase, store from which it was purchased, batch number and EAN code. If possible, make sure the product in question is saved and try to get hold of an unopened package from the same batch for possible testing. *(Add your own comments to the checklist!)*	
C. Evaluate C.1 Contact your supervisor or the person in charge of handling urgent customer complaints – evaluate together. C.2 If necessary, gather more information. Contact supplier? Conduct analyses? Seek the assistance of the supervising authority!	*(Add your own comments to the checklist!)*	

Control Point	Comments	Notes
D. Take action D.1 Protect other customers – Consider whether sales should be stopped! D.2 Inform supplier and supervising authority? D.3 Investigate whether the product should be recalled? D.4 Investigate, in cooperation with authorities, whether a press statement should be issued? D.5 Inform the affected customer. D.6 Request an investigation and follow-up by supplier.	*(Add your own comments to the checklist!)*	
E. Follow up – Improve E.1 Once the case is closed, follow up how it turned out and discuss how your procedures can be improved! E.2 Ensure that the responsible product developer is informed of the situation.		

Date: ……

Name of person who completed product alert checklist: ……

Company name and address: ……

2. Checklist for:

Purchasers for Food Manufacturers

Purpose: To improve the safety of food handling.

To help consumers with allergies and food intolerance.

Requirements: To be aware that consumers expect and demand all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

If changes involving allergens occur in a product or changes are made to production, the procedures below should be re-examined in order to ensure that no mistakes occur.

Control Point	Comments	Yes	No	Note current routines and possible improvements
1. General points				
1.1 Are there procedures for selecting suppliers? 1.2 Does your company have its own allergen list? 1:3 Do all purchasers receive training?	*These points should be included in the self-inspection program!* *At a minimum, the list should include the substances listed in the table on page 1.*			
2. Choice of supplier				
2.1 Is it a supplier that is already approved? 2.2 Does the supplier use procedures that guarantee that all allergenic substances are identified and handled in a correct manner? 2.3 Has the supplier been informed about your company's internal allergen list? 2.4 Does the supplier have adequate control of its sub-suppliers? 2.5 Does the supplier declare all ingredients, including carriers and processing aids? 2.6 Are there product specifications that cover all necessary information? 2.7 Can the supplier demonstrate good procedures for traceability? 2.8 Is there an approved alternative supplier, e.g. in case of delivery problems? 2.9 Are the procedures used for all suppliers? 2.10 Are supplier audits carried out?	***Examples of problems:*** The supplier is not aware of allergy/intolerance issues. Pasta with- and without egg is produced in same factory and may get mixed up. Breaded and unbreaded fish is handled on the same production line, nuts, peanuts or other allergens are handled on the production line or the premises without being given special consideration. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
3. Purchasing procedures				
3.1 Does the supplier know the rules regarding allergens and understand their implications? 3.2 Is information provided for all components of all ingredients and raw materials, from both the supplier and sub-suppliers? 3.3 Are there procedures for how the product should be labelled? 3.4 Are there procedures for how recipe changes or other changes to the product should be communicated/labelled? 3.5 Is the labelling of the supplied products clear and understandable? 3.6 Are there internal procedures for handling information on shortcomings in the labelling? 3.7 Are there procedures for informing suppliers and requesting improvement in the case of substandard labelling? 3.8 Are the procedures used and followed? 3.9 Are there procedures for following up suppliers?	***Examples of problems:*** Seasoning mixes used contain milk protein without this being declared. The supplier does not state what is produced on the same production line, labelling of delivered product unclear or incorrect such that it can not be easily identified. New recipe is not identified and old product is mixed with new. In the case of import from a third country, it is important to check that the supplier is familiar with the EU allergen list! *(Add your own examples to the checklist!)*			

Date: ……

Name of person who completed checklist: ……

Company name and address: ……

Go through your activities with the help of the checklist regularly. Take corrective measures. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
A. General A.1 Are there procedures for handling product alerts? A.2 Are the procedures used and followed?	This is a general guideline and the company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distribution managers.	
B. Gather information B.1 Is the customer still sick? B.2 What product did the customer eat? B.3 What else did the customer eat? B.4 Does the customer have a known allergy or intolerance – to what? B.5 Tell the person that you will get back to him/her.	If a customer is sick – suggest that he/she seek medical attention. Note the product name, size, "use by" date, date of purchase, store from which it was purchased, batch number and EAN code. If possible, make sure the product in question is saved and try to get hold of an unopened package from the same batch for possible testing. *(Add your own comments to the checklist!)*	
C. Evaluate C.1 Contact your supervisor or the person in charge of handling urgent customer complaints – evaluate together. C.2 If necessary, gather more information. Contact supplier? Conduct analyses? Seek the assistance of the supervising authority!	*(Add your own comments to the checklist!)*	

Control Point	Comments	Notes
D. Take action D.1 Protect other customers – Consider whether sales should be stopped! D.2 Inform supplier and supervising authority? D.3 Investigate whether the product should be recalled? D.4 Investigate, in cooperation with authorities, whether a press statement should be issued? D.5 Inform the affected customer. D.6 Request an investigation and follow-up by supplier.	*(Add your own comments to the checklist!)*	
E. Follow up – Improve E.1 Once the case is closed, follow up how it turned out and discuss how your procedures can be improved!		

Date: ……

Name of person who completed product alert checklist: ……

Company name and address: ……

3. Checklist for:
Purchasers for Shops and Retail

Purpose: To improve the safety of food handling.

To help consumers with allergies and food intolerance.

Requirements: Tobe aware that consumers expect and demand that food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

Control Point	Comments	Yes	No	Note current routines and possible improvements
1. General points				
1.1 Are there procedures for selecting suppliers? 1.2 Does your company have its own allergen list? 1:3 Do all purchasers receive training?	*These points should be included in the self-inspection program!* *At a minimum, the list should include the substances listed in the table on page 1.*			
2. Choice of supplier				
2.1 Is it a supplier that is already approved? 2.2 Does the supplier have procedures that guarantee that all allergenic substances are identified and handled in a correct manner? 2.3 Has the supplier been informed about your company's internal allergen list? 2.4 Does the supplier have adequate control of its sub-suppliers? 2.5 Does the supplier declare all ingredients, including carriers and processing aids? 2.6 Are there product specifications that cover all necessary information? 2.7 Can the supplier demonstrate good procedures for traceability? 2.8 Is there an approved alternative supplier, e.g. in case of delivery problems? 2.9 Are the procedures used for all suppliers? 2.10 Are supplier audits carried out?	***Examples of problems:*** The supplier is not aware of allergy/intolerance issues. Pasta with- and without egg is produced in same factory and may get mixed up. Breaded and unbreaded fish is handled on the same production line, nuts, peanuts or other allergens are handled on the production line or the premises without being given special consideration. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
3. Purchasing procedures				
3.1 Does the supplier know the rules regarding allergens and understand their implications? 3.2 Is information provided for all components of all ingredients and raw materials, from both the supplier and sub-suppliers? 3.3 Are there procedures for how the product should be labelled? 3.4 Are there procedures for how recipe changes or other changes to the product should be communicated/labelled? 3.5 Is the labelling of the supplied products clear and understandable? 3.6 Are there internal procedures for handling information on shortcomings in the labelling? 3.7 Are there procedures for informing suppliers and requesting improvement in the case of substandard labelling? 3.8 Are the procedures used and followed? 3.9 Are there procedures for following up suppliers?	***Examples of problems:*** Seasoning mixes used contain milk protein without this being declared. The supplier does not state what is produced on the same production line, labelling of delivered product unclear or incorrect such that it can not be easily identified. New recipe is not identified and old product is mixed with new. In the case of import from a third country, it is important to check that the supplier is familiar with the EU allergen list! *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
4. Purchasing procedures – In-store packing of foods for the consumer				
4.1 Are the legal requirements for labelling of substances listed in the table being met? 4.2 Is the labelling of delivered products clear and understandable? 4.3 Are there procedures for handling products with missing or substandard labels? 4.4 Are there procedures for getting feedback from shops that detect shortcomings in labelling? 4.5 Are there procedures for informing suppliers and requesting improvement when labelling problems occur? 4.6 Are there procedures for producing information for labelling of products sold in the store? 4.7 Are there appropriate equipment and work tools for in-store handling? 4.8 Does the store have procedures for transferring ingredient lists from supplier packaging to store-packed product? 4.9 Are the procedures used and followed?	***Examples of problems:*** Labels are not affixed properly, text is illegible (small print, poor contrast between text and background). Seasoning mixes that contain milk protein used without this being declared. *(Add your own comments to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
5. Existing product with new composition – Made from new recipe				
5.1 Are there procedures for the supplier to communicate recipe changes to the purchaser regarding the substances listed in the table? 5.2 Does the recipe change involve the addition of any of the substances listed in the table? 5.3 Have the store and consumer been informed of the "new recipe" through information on the package, change in design, in-store signs, or similar? 5.4 Are there procedures for handling old stock so that the store does not confuse "old" product with "new"? 5.5 Are the procedures used and followed?	***Examples of problems:*** Popsicle with milk protein added is sold in similar packaging as product without milk protein. Almonds on baked roll replaced by peanut topping without clear information or change in package design. *(Add your own comments to the checklist!)*			
6. Restaurants and caterers				
6.1 Is food prepared in the store being sold?	See separate checklist for restaurants and catering! *(Add your own comments to the checklist!)*			

Date: ……

Name of person who completed checklist: ……

Company name and address: ……

Go through your activities with the help of the checklist regularly. Take corrective measures. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
A. General A.1 Are there procedures for handling product alerts? A.2 Are the procedures used and followed?	This is a general guideline and the company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distribution managers.	
B. Gather information B.1 Is the customer still sick? B.2 What product did the customer eat? B.3 What else did the customer eat? B.4 Does the customer have a known allergy or intolerance – to what? B.5 Tell the person that you will get back to him/her.	If a customer is sick – suggest that he/she seek medical attention. Note the product name, size, "use by" date, date of purchase, store from which it was purchased, batch number and EAN code. If possible, make sure the product in question is saved and try to get hold of an unopened package from the same batch for possible testing. *(Add your own comments to the checklist!)*	
C. Evaluate C.1 Contact your supervisor or the person in charge of handling urgent customer complaints – evaluate together. C.2 If necessary, gather more information. Contact supplier? Conduct analyses? Seek the assistance of the supervising authority!	*(Add your own comments to the checklist!)*	

Control Point	Comments	Notes
D. Take action D.1 Protect other customers – Consider whether sales should be stopped! D.2 Inform supplier and supervising authority? D.3 Investigate whether the product should be recalled? D.4 Investigate, in cooperation with authorities, whether a press statement should be issued? D.5 Inform the affected customer. D.6 Request an investigation and follow-up by supplier.	*(Add your own comments to the checklist!)*	
E. Follow up – Improve E.1 Once the case is closed, follow up how it turned out and discuss how your procedures can be improved! E.2 Ensure that the purchaser responsible is informed of the situation.		

Date: ……

Name of person who completed product alert checklist: ……

Company name and address: ……

4. Checklist for people working in:
Food Production

Purpose: To improve the safety of food handling.

To help consumers with allergies and food intolerance.

Requirements: To be aware that consumers expect and demand all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

If changes involving allergens occur in a product or changes are made to production, the procedures below should be re-examined in order to ensure that no mistakes occur.

Control Point	Comments	Yes	No	Note current routines and possible improvements
1. General points				
1.1 Self-inspection/HACCP plans Are there HACCP programs that include allergy risks for all parts of the production chain – from receiving and storage of raw materials to finished product?				
1.2 Training Do those working with food production receive ongoing training on allergy issues?	Don't forget replacement staff, job rotation workers, maintenance staff, etc. Employee must understand the risks of allergens, e.g. in order to minimize contamination of the product by allergens.			
1.3 Information on recipe changes Are there procedures in place to ensure that those working in production are informed of recipe changes?				
1.4 Procedures for recipe changes Are there procedures on how recipe changes are to be handled in production?	HACCP programs may need to be reviewed, changes to product numbers for raw materials, intermediate goods and finished product may be needed, new packaging should be used, etc.			

Control Point	Comments	Yes	No	Note current routines and possible improvements
1.5 Alternate raw material suppliers Are there procedures in place to ensure that a raw material supplier, processing aid, etc., can not be substituted without prior approval by the responsible persons within the company?				
1.6 Measures in the case of suspected contamination Are employees encouraged to take immediate action in the case of suspected contamination, incorrect labelling, etc., and are there procedures in place?	*See also "Handling procedures for product alerts", A1–E1, at end of checklist!*			
1.7 Internal audits Are regular internal audits conducted to ensure compliance with the general requirements for control of allergy risks?				
2. Raw materials: Receiving, storage, weighing				
2.1 Purchasing When purchasing and receiving raw materials, is consideration given to the risk of contamination prior to new raw materials entering the premises?				

Control Point	Comments	Yes	No	Note current routines and possible improvements
2.2 Receiving raw materials Are there procedures for how raw materials, ingredients and intermediate goods are identified upon receipt in order to make sure the right raw material has been delivered?				
2.3 Labelling Are raw materials, intermediate goods and finished product clearly labelled so there is no risk for mix-ups?				
2.4 Handling Are allergenic raw materials, ingredients and intermediate goods kept separate from each other and from other foods so the risk of contamination is minimized?	This is especially important when handling unpackaged goods. E.g. separate areas for storage and weighing of allergenic raw material are needed, separate ventilation exhaust, etc.			
3. Production, premises and equipment				
3.1 Access to instructions Are instructions on how to prevent contamination visible or readily available in the production area?				

Control Point	Comments	Yes	No	Note current routines and possible improvements
3.2 Design of premises, equipment and work tools Are premises, equipment and work tools designed so that they are easy to clean and contamination between products and production lines is minimized?	This is particularly important when handling unpackaged products, e.g. when weighing and mixing dry ingredients.			
3.3 Maintenance schedule Is there a schedule for maintenance of the premises and equipment?				
3.4 Knowledge on hygienic design Do maintenance personnel have knowledge about hygienic design to minimize the risk of contamination, e.g. through proper design of piping, elbows and bends, pumps, etc.?				
3.5 Hygiene rules for employees Are there hygiene rules for all personnel, covering, e.g. clothing, hand-washing and hand contact with foods?	Keep in mind that hygiene rules also apply to maintenance staff, contractors and visitors.			

Control Point	Comments	Yes	No	Note current routines and possible improvements
3.6 Order of production Are there clear procedures for production order and how this is determined?	If the products are packaged at a later time, attention must also be paid to the allergy risks when establishing packaging order.			
3.7 Recipes Are there procedures to ensure that the right recipe is always used?				
3.8 Raw materials Are there procedures to ensure that the right raw materials are always used?				
3.9 Packaging Are there procedures to ensure that the right product is always packed in the right packaging?	In cases where packages have a similar appearance, such as for flavour variants, it is particularly important to ensure that the correct packaging is used. In this context, it is recommended that the responsible production personnel sign a checklist.			
3.10 Follow-up Do factory personnel carry out continuous review of possible situations for cross-contamination between products or production lines?	It is important to identify responsibility and authority.			

Control Point	Comments	Yes	No	Note current routines and possible improvements
3.11 Rework Are there procedures for the use of rework (internally recycled product)?	It is important that rework ends up in the right product and does not contaminate other products. Product containing an allergen should only be used in products where that allergen is already present. How and when rework may be used should be documented. Rework must be correctly labelled for proper identification and handling.			
3.12 Traceability of rework Is there a procedure for tracking rework used in the finished product?	Keep in mind that contamination can also occur after manufacturing, for example, when handling intermediate goods that have not been packaged for market.			
3.13 Waste management Are there procedures for waste management?	Waste must be labelled and be able to be distinguished from rework.			
3.14 Substandard products Are there procedures for handling products that deviate?	Needed for traceability, blocking of shipments, etc.			

Control Point	Comments	Yes	No	Note current routines and possible improvements
4. Cleaning and controls				
4.1 Cleaning procedures Are there documented cleaning procedures to ensure that unintentional contamination has not occurred?	Cleaning procedures are needed for the premises, equipment and work tools.			
4.2 Cleaning instructions Are there clear instructions for the cleaning required for premises, equipment and work tools?	Sufficient time must be allotted for cleaning. Hidden areas in the equipment must be identified, and equipment may need to be dismantled.			
4.3 Cleaning instructions – Production Are there clear instructions for the cleaning required in between the production of different products on the same production line?	If the products are packed at a later time, attention must also be paid to allergy risks when establishing the cleaning procedures for packing equipment.			
4.4 Post-production controls Are there procedures for, when relevant, testing a food after manufacturing, in order to confirm that no unintentional exposure to allergen has occurred?				

Date: ……

Name of person who completed checklist: ……

Company name and address: ……

Go through your activities with the help of the checklist regularly. Take corrective measures. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
A. General points A.1 Are there procedures for handling product alerts? A.2 Are the procedures used and followed?	This is a general guideline and the company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distribution managers.	
B. Gather information B.1 Is the customer still sick? B.2 What product did the customer eat? B.3 What else did the customer eat? B.4 Does the customer have a known allergy or intolerance – to what? B.5 Tell the person you will get back to him/her.	If a customer is sick – suggest that he/she seek medical attention. Note the product name, size, "use by" date, date of purchase, store from which it was purchased, batch number and EAN code. If possible, make sure that the product in question is saved and try to get hold of an unopened package from the same batch for possible testing. *(Add your own comments to the checklist!)*	
C. Evaluate C.1 Contact your supervisor or the person in charge of handling urgent customer complaints – evaluate together. C.2 If necessary, gather more information. Contact supplier? Conduct analyses? Seek the assistance of the supervising authority!	*(Add your own comments to the checklist!)*	

Control Point	Comments	Notes
D. Take action D.1 Protect other customers – Consider whether sales should be stopped! D.2 Inform supplier and supervising authority? D.3 Investigate whether the product should be recalled? D.4 Investigate, in cooperation with authorities, whether a press statement should be issued? D.5 Inform the affected customer. D.6 Request an investigation and follow-up by supplier.	*(Add your own comments to the checklist!)*	
E. Follow up – Improve E.1 Once the case is closed, follow up how it turned out and discuss how your procedures can be improved! E.2 Ensure that the production staff responsible are informed of the situation.		

Date: ……

Name of person who completed product alert checklist: ……

Company name and address: ……

5. Checklist for people working with:
Consumer Information

Purpose: To improve the safety of food handling.

To help consumers with allergies and intolerance.

Requirements: To be aware that consumers expect and demand all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors in the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

.

Control Point	Comments	Yes	No	Note current routines and possible improvements
1. Training Do those working with consumer information receive ongoing training on allergy issues?				
2. Guidelines Are there guidelines for how your consumer care department or similar informs consumers about the company's products?	E.g. a database on allergen information can be established to use as a basis for responding to consumer queries. It is essential that this information be kept up to date.			
3. Statistics Are statistics kept on incoming questions about allergens, and are there procedures for following up these questions?				
4. Procedures regarding product information Are there procedures in place to ensure that those working with consumer information are informed about product content, recipe changes, or similar?	***Examples of problems:*** Recipe changes are made without informing consumer care department, salespersons, etc. Information on websites etc. is not up to date or can be misunderstood.			

Control Point	Comments	Yes	No	Note current routines and possible improvements
5. Procedures for immediate measures Are there procedures in place for those working with consumer contact to take action in the case of suspected contamination or incorrect labelling?	It is important to make an assessment regarding the risk for contamination and use this as a starting point when responding to consumer queries.			
6. Emergency plan Does the company have an emergency plan that gives clear instructions on what should be done if a suspected allergic reaction occurs?				
7. Updating procedures Are there procedures to ensure that information in allergen lists and other product information is correct and up to date?	***Examples of problems:*** Recipe changes are made without informing the consumer care department, salespersons, etc. Information on websites etc. is not up to date or can be misunderstood.			
8. Sector agreement - Product fact sheets Is the sector agreement on product fact sheets from Li being followed?	*(This question only applies if allergen lists are issued in some form to customers.)*			

Date: ……

Name of person who completed checklist: ……

Company name and address: ……

Go through your activities with the help of the checklist regularly. Take corrective measures. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
A. General points A.1 Are there procedures for handling product alerts? A.2 Are the procedures used and followed?	This is a general guideline and the company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distribution managers.	
B. Gather information B.1 Is the customer still sick? B.2 What product did the customer eat? B.3 What else did the customer eat? B.4 Does the customer have a known allergy or intolerance – to what? B.5 Tell the person you will get back to him/her.	If a customer is sick – suggest that he/she seek medical attention. Note the product name, size, "use by" date, date of purchase, store from which it was purchased, batch number and EAN code. If possible, make sure the product in question is saved and try to get hold of an unopened package from the same batch for possible testing. *(Add your own comments to the checklist!)*	
C. Evaluate C.1 Contact your supervisor or the person in charge of handling urgent customer complaints – evaluate together. C.2 If necessary, gather more information. Contact supplier? Conduct analyses? Seek the assistance of the supervising authority!	*(Add your own comments to the checklist!)*	

Control Point	Comments	Notes
D. Take action D.1 Protect other customers – Consider whether sales should be stopped! D.2 Inform supplier and supervising authority? D.3 Investigate whether the product should be recalled? D.4 Investigate, in cooperation with authorities, whether a press statement should be issued? D.5 Inform the affected customer. D.6 Request an investigation and follow-up by supplier.	*(Add your own comments to the checklist!)*	
E. Follow up – Improve E.1 Once the case is closed, follow up how it turned out and discuss how your procedures can be improved! E.2 Ensure that the person who took the complaint is informed of the situation.		

Date: ……

Name of person who completed product alert checklist: ……

Company name and address: ……

6. Checklist for people working in:
Shops and Retail

Purpose: To improve the safety of food handling.

To help consumers with allergies and food intolerance.

Requirements: To be aware that consumers expect and demand all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

Control Point	Comments	Yes	No	Note current routines and possible improvements
1. General points				
1.1 Are there procedures for handling allergens? 1.2 Does the store have its own allergen list? 1.3 Do all employees receive training?	*These points must be included in the self-inspection program!*			
2. Sweets, "natural sweets", nuts - unpackaged 2.1 Are sweets, nuts or products that contain the substances listed in the table sold in bulk? 2.2 Are the products placed in such a way as to reduce the risk for contamination of (exposure to) other foods? 2.3. Is information about product ingredients available? 2.4 Are there procedures for continuous updating of ingredient lists? 2.5 Are appropriate tools (scoops, tongs) provided to take these products? 2.6 Are separate tools provided for allergenic foods? 2.7.Are there filling and cleaning procedures that reduce the risk of contamination? 2.8 Are the procedures used and followed?	Nut chocolate, chocolate coated hazelnuts, yoghurt coated fruit, sesame seed candies. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
3. In-store bakery 3.1 Are breads and other goods baked in the store sold? 3.2 Do these products contain allergens? 3.3 Are the products placed in such a manner as to reduce the risk for exposure to (contamination of) other foods? 3.4 Is information about product ingredients available? 3.5 Are there procedures for continuous updating of ingredient lists? 3.6 Are appropriate tools (scoops, tongs) provided to take these products? 3.7 Are separate tools provided for allergenic foods? 3.8 Are there filling and cleaning procedures that reduce the risk of contamination? 3.9 Are the procedures used and followed?	Risk products include country bread with soy flour, French rolls with sesame seeds, peanut butter cookies, cream pastries, peanut topping used as a decoration. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
4. Marinated delicacies – unpackaged 4.1 Are marinated delicacies that contain the substances listed in the table sold in bulk? 4.2 Are the products placed in such a way as to minimize the risk for exposure of other foods? 4.3 Is there information about product ingredients available? 4.4 Are there procedures for continuous updating of ingredient lists? 4.5 Are appropriate tools (scoops, tongs) provided to take these products? 4.6 Are separate tools provided for allergenic foods? 4.7 Are there filling and cleaning procedures that reduce the risk of contamination? 4.8 Are the procedures used and followed?	Risk products include feta cheese and olive mixtures, anchovy-stuffed olives, satay-based marinades (peanuts). Keep in mind that marinade drippings can contaminate other products. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
5. Restaurants and caterers 5.1 Are ready-to-eat foods sold in serving size portions? 5.2 See separate checklist for restaurants and catering!				
6. Meat counter – in-store packing 6.1 Are products that contain the substances listed in the table handled and packed in the store? 6.2 Are products placed in such a manner as to reduce the risk for contamination of other foods? 6.3 Is there information about product ingredients available? 6.4 Are there procedures for continuous updating of ingredient lists? 6.5 Are appropriate tools used? 6.6 Are separate tools used for allergenic foods? 6.7 Are there filling and cleaning procedures that reduce the risk of contamination? 6.8 Are the procedures used and followed?	**Risk products** include sausages, refrigerated ready-to-eat foods, salad mixtures, liver paté. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
7. Cheese counter – in-store packing 7.1 Are products that contain the substances listed in the table handled and packed in the store? 7.2 Are products placed in such a manner as to reduce the risk for contamination of other foods? 7.3 Is there information about product ingredients available? 7.4 Are there procedures for continuous updating of ingredient lists? 7.5 Are appropriate tools used? 7.6 Are separate tools used for allergenic foods? 7.7 Are there filling and cleaning procedures that reduce the risk of contamination? 7.8 Are the procedures used and followed?	*(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
8. Fish counter – in-store packing 8.1 Are products that contain the substances listed in the table handled and packed in the store? 8.2 Are products placed in such a manner as to reduce the risk for contamination of other foods? 8.3 Is there information about product ingredients available? 8.4 Are there procedures for continuous updating of ingredient lists? 8.5 Are appropriate tools used? 8.6 Are separate tools used for allergenic foods? 8.7 Are there filling and cleaning procedures that reduce the risk of contamination? 8.8 Are the procedures used and followed?	Risk products include fish- and shellfish patés, seafood/egg salad, breaded herring. Keep in mind that drippings and splashes can contaminate other products. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
9. Unpackaged foods of other types than those listed above 9.1 Are products that contain the substances listed in the table handled and packed in the store? 9.2 Are products placed in such a manner as to reduce the risk for contamination of other foods? 9.3 Is there information about product ingredients available? 9.4 Are there procedures for continuous updating of ingredient lists? 9.5 Are appropriate tools used? 9.6 Are separate tools used for allergenic foods? 9.7 Are there filling and cleaning procedures that reduce the risk of contamination? 9.8 Are the procedures used and followed?	Frozen shrimp, pickled cucumbers, marinated grilled chicken cooked in the store, beer sausages. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note current routines and possible improvements
10. Purchasing procedures – supplier-packed foods 10.1 Choice of supplier and product – see separate checklist for purchasers. 10.2 Is the labelling of delivered products clear and easy to understand? 10.3 Are there procedures for handling products with missing- or substandard labelling, or that have no Swedish text? 10.4 Are there procedures for informing the supplier and person responsible for purchasing when there are shortcomings in the labelling? 10.5 Are the procedures used and followed?	Labels are not properly affixed, text is very difficult to read (small print, poor contrast between text and background). *(Add your own examples to the checklist!)*			
11. Existing product with new composition – Made from new recipe 11.1 Is there a procedure for communicating recipe changes to the store? 11.2 Does the change in recipe involve introduction of any of the substances listed in the table? 11.3 Is the "new recipe" brought to the attention of customers, e.g. through information on the package, change in design, or in-store signs? 11.4 Are there procedures for handling old stock so that the store does not mix up "old" product with "new"? 11.5 Are the procedures used and followed?	***Examples of problems:*** Popsicle with milk protein added is sold in similar packaging as product without milk protein. Almonds on baked roll replaced by peanut topping without clear information or change in package design. *(Add your own examples to the checklist!)*			

Date: ……

Name of person who completed checklist: ……

Company name and address: ……

Go through your activities with the help of the checklist regularly. Take corrective measures. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
A. General points A.1 Are there procedures for handling product alerts? A.2 Are the procedures used and followed?	This is a general guideline and the company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distribution managers.	
B. Gather information B.1 Is the customer still sick? B.2 What product did the customer eat? B.3 What else did the customer eat? B.4 Does the customer have a known allergy or intolerance – to what? B.5 Tell the person you will get back to him/her.	If a customer is sick – suggest that he/she seek medical attention. Note the product name, size, "use by" date, date of purchase, store from which it was purchased, batch number and EAN code. If possible, make sure the product in question is saved and try to get hold of an unopened package from the same batch for possible testing. *(Add your own comments to the checklist!)*	
C. Evaluate C.1 Contact your supervisor or the person in charge of handling urgent customer complaints – evaluate together. C.2 If necessary, gather more information. Contact supplier? Conduct analyses? Seek the assistance of the supervising authority!	*(Add your own comments to the checklist!)*	

Control Point	Comments	Notes
D. Take action D.1 Protect other customers – Consider whether sales should be stopped! D.2 Inform supplier and supervising authority? D.3 Investigate whether the product should be recalled? D.4 Investigate, in cooperation with authorities, whether a press statement should be issued? D.5 Inform the affected customer. D.6 Request an investigation and follow-up by supplier.	*(Add your own comments to the checklist!)*	
E. Follow up – Improve E.1 Once the case is closed, follow up how it turned out and discuss how your procedures can be improved!		

Date: ……

Name of person who completed product alert checklist: ……

Company name and address: ……

7. Checklist for people working in:
Restaurants and Catering

Purpose: To improve the safety of food handling.

To help consumers with allergies and food intolerance.

Requirements: To be aware that consumers expect and demand all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

Control Point	Comments	Yes	No	Note what is done and what can be improved
1. Purchasing				
1.1 Are there procedures for selecting suppliers? 1.2 Does your company have its own allergen list? 1:3 Do all purchasers receive training ?	*These points should be included in the self-inspection program!* *At a minimum, the list should include the substances listed in the table on page 1.*			
2. Choice of supplier				
2.1 Is it a supplier that is already approved? 2.2 Does the supplier have procedures that guarantee that all allergenic substances are identified and handled in a correct manner? 2.3 Has the supplier been informed of your company's internal allergen list? 2.4 Does the supplier have adequate control of its sub-suppliers? 2.5 Does the supplier declare all ingredients, including carriers and processing aids? 2.6 Are there product specifications that cover all of the necessary information? 2.7 Can the supplier demonstrate good procedures for traceability? 2.8 Is there an approved alternative supplier, e.g. in case of delivery problems? 2.9 Are the procedures used for all suppliers? 2.10 Are supplier audits carried out?	***Examples of problems:*** The supplier is not aware of allergy/intolerance issues. Pasta with- and without egg is produced in same factory and may get mixed up. Breaded and unbreaded fish is handled on the same production line, nuts, peanuts or other allergens are handled on the production line or the premises without being given special consideration. *(Add your own examples to the checklist!)*			

Control Point	Comments	Yes	No	Note what is done and what can be improved
3. Purchasing procedures				
3.1 Does the supplier know the rules regarding allergens and understand their implications?	***Examples of problems:*** Seasoning mixes used contain milk protein without this being declared.			
3.2 Is information provided for all components of all ingredients and raw materials, from both the supplier and sub-suppliers?	The delivered product is labelled unclearly or incorrectly such that it can not be easily identified.			
3.3 Are there procedures for how the product should be labelled?	New recipe is not identified and old product is mixed with new.			
3.4 Are there procedures for how recipe changes or other changes to the product should be communicated /labelled?				
3.5 Is the labelling of the supplied products clear and understandable?	In the case of import from a third country, it is important to check that the supplier is familiar with the EU allergen list!			
3.6 Are there internal procedures for handling information on shortcomings in the labelling?				
3.7 Are there procedures for informing suppliers and requesting improvement in the case of substandard labelling?	*(Add your own examples to the checklist!)*			
3.8 Is the risk of contamination considered before new raw materials are taken into the premises?				
3.9 Are the procedures used and followed?				
3.10 Are there procedures for following up suppliers?				

Control Point	Comments	Yes	No	Note what is done and what can be improved
4. Procedures and training				
4.1 Self-inspection/HACCP plans Are there self-inspection/HACCP programs that include allergy risks for all parts of food preparation – from receiving, handling and storage of raw materials to finished food dishes?				
4.2 Training Do those working with the preparation of foods receive ongoing training on allergy issues?	Don't forget replacement staff, job rotation workers, maintenance staff, etc. Employees must understand the risks of allergens, e.g. in order to minimize contamination of the product by allergens and be able to meet the needs and wishes of the customer.			
4.3 Information on recipe changes Are there procedures in place to ensure that those who prepare and serve food are informed of recipe changes?				
4.4 Procedures for recipe changes Are there procedures on how recipes changes are to be handled in food preparation?	Self-inspection/HACCP programs may need to be reviewed, changes to product numbers for raw materials, intermediate goods and finished product may be needed, new packaging should be used, etc.			

Control Point	Comments	Yes	No	Note what is done and what can be improved
4.5 Measures in the case of suspected contamination Are employees encouraged to take immediate action in the case of suspected contamination, incorrect labelling, mistakes in menus and other customer information, and are there procedures in place?	*See also "Handling procedures for product alerts", A1–E1, at end of checklist!*			
4.6 Emergency plan Does the company have an emergency plan that gives clear instructions on what should be done if a suspected allergic reaction to a meal occurs?	*See also "Handling procedures for product alerts", A1–E1, at end of checklist!*			
4.7 Internal audits Are regular internal audits conducted to ensure compliance with the general requirements for control of allergy risks?				
5. Raw materials: Receiving, storage, weighing				
5.1 Receiving raw materials Are there procedures on how raw materials, ingredients and intermediate goods are identified upon receipt in order to make sure that the right raw material has been delivered?				
5.2 Labelling Are raw materials, intermediate goods and finished product clearly labelled so there is no risk for mix-ups?				

Control Point	Comments	Yes	No	Note what is done and what can be improved
5.3 Handling Are allergenic raw materials, ingredients and intermediate goods kept separate from each other and from other foods so the risk of contamination is minimized?				
6. Preparation, premises and equipment				
6.1 Access to instructions Are instructions for how to prevent contamination visible or readily available in the food preparation area?				
6.2 Design of premises Are premises, equipment and utensils designed so that they are easy to clean and contamination between products and preparation surfaces is minimized?	This is especially important when preparing foods for special diets. Aluminium and enamel pots, and wooden and plastic utensils constitute contamination risks and are not recommended. Always use stainless steel pots, bowls and utensils. The use of porcelain plates and real glassware is also recommended. If several foods for special diets are prepared in the same area, is there a risk for cross-contamination?			
6.3 Preparation of foods for special diets and foods without allergens in the recipe. Is there a special area and specially labelled utensils for preparation of such foods?	When preparing and heating foods in a microwave oven, separate protective lids should be used for each special food dish.			

Control Point	Comments	Yes	No	Note what is done and what can be improved
6.4 Maintenance schedule Is there a schedule for maintenance of the premises and equipment?				
6.5 Hygiene rules for employees Are there hygiene rules for all personnel, covering, e.g. clothing, hand-washing and hand contact with foods?	Keep in mind that hygiene rules also apply to maintenance staff, contractors and visitors.			
6.6 Order of preparation Are there clear procedures for preparation order and how this is determined?	If meals and foods for special diets are packed at a later time, attention must also be paid to the allergy risks when establishing the packaging order. The system used to determine preparation order needs to be such that it is easy for personnel to understand and use. This is necessary so that procedures work also when preparing many different dishes with varying allergen contents.			
6.7 Recipes Are there procedures to ensure that the right recipe is always used?				
6.8 Raw materials Are there procedures to ensure that the right raw materials are always used?				

Control Point	Comments	Yes	No	Note what is done and what can be improved
6.9 Labelling Are there procedures to ensure that packaged food dishes are always labelled correctly?	Label the container itself – labelling the lid can lead to mix-ups.			
6.10 Follow-up Do the personnel carry out continuous review of possible situations for cross-contamination between meals or work counters, cooking and food preparation vessels and utensils?				
6.11 Storage containers for foods for special diets Are there procedures to ensure that the right product is packed in the right container?	In cases where packaging/serving containers of similar appearances are used, it is especially important to ensure that the correct containers are used and that labelling is correct. In this context, it is recommended that the personnel responsible sign a checklist.			
7. Distribution and serving				
7.1 Serving Are there procedures for handling food dishes and providing information for the guests?	Open handling of several different food dishes can lead to a risk for contamination. Plated dishes for allergic guests can be confused with meals for other guests.			
7.2 Utensils Are there separate utensils for every food dish?	Buffet service and foods for special diets should not be served at the same table if proper procedures are not in place.			

Control Point	Comments	Yes	No	Note what is done and what can be improved
8. Cleaning and controls				
8.1 Cleaning procedures Are there documented cleaning procedures to ensure that unintentional contamination has not occurred?	Cleaning routines are needed for the premises, equipment and utensils.			
8.2 Cleaning instructions Are there clear instructions for the cleaning required for premises, equipment and utensils?	Sufficient time must be allotted for cleaning. Hidden areas in the equipment must be identified, and equipment may therefore need to be dismantled.			
8.3 Cleaning instructions – Preparation Are there clear instructions for the cleaning required in between the preparation of different dishes in the same premises?	If the products are packed at a later time, attention must also be paid to allergy risks when establishing the cleaning routines for packing equipment.			
8.4 Post-preparation controls Are there procedures for, when relevant, testing food dishes after preparation, in order to confirm that no unintentional exposure to allergen has occurred?				

Date: ……

Name of person who completed checklist: ……

Company name and address: ……

Go through your activities with the help of the checklist regularly. Take corrective measures. Save completed checklists!

Handling procedures for product alerts

Control Point	Comments	Notes
A. General points A.1 Are there procedures for handling food alerts? A.2 Are the procedures used and followed?	This is a general guideline and the company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distributions managers.	
B. Gather information B.1 Is the customer still sick? B.2 What product did the customer eat? B.3 What else did the customer eat? B.4 Does the customer have a known allergy or intolerance – to what? B.5 Tell the person you will get back to him/her.	If a customer is sick – suggest that he/she seek medical attention. Note the person's name and telephone number. Note the product name, size, "use by" date, date of purchase, store from which it was purchased, batch number and EAN code. If possible, make sure that the product in question is saved and try to get hold of an unopened package from the same batch for possible testing. *(Add your own comments to the checklist!)*	
C. Evaluate C.1 Contact your supervisor or the person in charge of handling urgent customer complaints – evaluate together. C.2 If necessary, gather more information. Contact supplier? Conduct analyses? Seek the assistance of the supervising authority!	Save all of the food served to the affected guest in order to enable analysis. *(Add your own comments to the checklist!)*	

Control Point	Comments	Notes
D. Take action D.1 Protect other guests – Consider whether sales should be stopped! D.2 Inform supplier and supervising authority? D.3 Investigate whether the food dish should be recalled? D.4 Investigate, in cooperation with authorities, whether a press statement should be issued? D.5 Inform the affected guest. D.6 Request an investigation and follow-up by supplier.	*(Add your own comments to the checklist!)*	
E. Follow up – Improve E.1 Once the case is closed, follow up how it turned out and discuss how your procedures can be improved! E.2 Ensure that the person who prepared the food dish is informed of the situation.		

Date: ……

Name of person who completed food alert checklist: ……

Company name and address: ……

8. Checklist for those working with:

Supervision – Official Food Control

Purpose: To improve the safety of food handling.

To help consumers with allergies and food intolerance.

Requirements: To be aware that consumers expect and demand all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

To read the food sector guidelines and have insight on what "allergy and intolerance" involves! It is important to be aware of the degree of sensitivity, reactions and consequences.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

Control Point	Things to think about	Yes	No	Notes – Evaluation results
1. Hazard analysis 1.1 Has attention been paid to the risk of allergy and intolerance in the hazard analysis? 1.2 Critical control points (CCP)	Only one type of substance, i.e. nuts, is considered; the company declares "may contain traces of" without careful analysis and required measures; apart from the EU list, allergens and intolerance-causing substances are not discussed at all. Critical limits, procedures for corrective action, verification procedures. Have appropriate preventive measures been taken in handling, storage and labelling?			
2. Supplier assessment 2.1 Are there established procedures? 2.2 Are they appropriate for the purpose? 2.3 Are they followed? 2.4 Are they updated as needed?	Critical review of the supplier's statements. Proper certificates/product specifications. Is the supplier's information assessed to be accurate?			
3. Training and supervision of employees? 3.1 Are there established procedures? 3.2 Are they appropriate for the purpose? 3.3 Are they followed? 3.4 Are they updated as needed?	Are the problematics of allergy addressed in the training content? Training of different personnel groups, including also product developers, purchasers, sales staff, dishwashers and cleaning staff, and temporary staff.			

Control Point	Things to think about	Yes	No	Notes – Evaluation results
4. Product development and new recipes 4.1 Are there established procedures? 4.2 Are they appropriate for the purpose? 4.3 Are they followed? 4.4 Are they updated as needed?	Clear labelling. New recipe contains allergens – clear change on the consumer package.			
5. Raw materials 5.1 Are there established procedures? 5.2 Are they appropriate for the purpose? 5.3 Are they followed? 5.4 Are they updated as needed?	Carriers for herb/spice mixes. Compound ingredients, e.g. roasted bread crumbs and mixes. Separate storage of opened packages and food carts.			
6. Rework 6.1 Are there established procedures? 6.2 Are they appropriate for the purpose? 6.3 Are they followed? 6.4 Are they updated as needed?	Included in the flow chart. Clear labelling of containers to distinguish rework/recycled foods and containers for waste.			

Control Point	Things to think about	Yes	No	Notes – Evaluation results
7. Labelling of raw materials during production and handling 7.1 Are there established procedures? 7.2 Are they appropriate for the purpose? 7.3 Are they followed? 7.4 Are they updated as needed?	Intermediate goods stored before further processing are properly labelled (e.g. in open food tubs/carts).			
8. Cleaning 8.1 Are there established procedures? 8.2 Are they appropriate for the purpose? 8.3 Are they followed? 8.4 Are they updated as needed?	Production planning. Cleaning with respect to allergens. Documented post-cleaning controls. Is the person responsible for the control indicated?			
9. Labelling 9.1 Are there established procedures? 9.2 Are they appropriate for the purpose? 9.3 Are they followed? 9.4 Are they updated as needed?	Clear labelling with large enough print and contrast. Allergens in the recipe's raw materials included in the ingredient list. New recipes, new raw materials, labelling controls.			

Control Point	Things to think about	Yes	No	Notes – Evaluation results
10. Finished product and post-production controls 10.1 Are there established procedures? 10.2 Are they appropriate for the purpose? 10.3 Are they followed? 10.4 Are they updated as needed?	Analyses of sufficient precision and sensitivity. Representative sampling.			
11. Are products labelled "…free"? 11.1 Are there established procedures? 11.2 Are they appropriate for the purpose? 11.3 Are they followed? 11.4 Are they updated as needed?	How should product safety work be conducted to be good enough to permit this type of labelling? Product registered with the National Food Administration.			
12. Does product labelling include the wording "may contain …"? 12.1 Are there established procedures? 12.2 Are they appropriate for the purpose? 12.3 Are they followed? 12.4 Are they updated as needed?	How should product safety work be conducted to be good enough to permit this type of labelling?			

Control Point	Things to think about	Yes	No	Notes – Evaluation results
13. Premises and equipment 13.1 Are there established procedures? 13.2 Are they appropriate for the purpose? 13.3 Are they followed? 13.4 Are they updated as needed?	Maintenance. Ventilation. Neatness and order in storerooms and temporary storage areas.			
14. Handling procedures for product alerts 14.1 Are there established procedures? 14.2 Are they appropriate for the purpose? 14.3. Are they followed? 14.4 Are they updated as needed?	The company's own procedures should always be followed first. People often involved in alerts are those working with consumer contact, purchasing, and marketing and distribution managers. Corrective measures. Access to decision-makers. Traceability.			
15. Customer complaints 15.1 Are there established procedures? 15.2 Are they appropriate for the purpose? 15.3. Are they followed? 15.4 Are they updated as needed?	Review incoming complaints. Corrective measures for product and raw material.			

Date: ……

Name of person who completed checklist: ……

Name of object of supervision: ……

9. Checklist for:
Consumers

Purpose: To improve the safety of food handling.

To minimize the risk for mistakes

To draw attention to the consumer's own responsibility.

Requirements: Consumers expect and demand that all food handlers to have the knowledge and insight required to supply safe foods of high quality. Consumers can not be responsible for mistakes and errors at the production and distribution stage.

In this document, *allergens* refers to allergens and other substances that cause allergies and food intolerance.

The substances listed below and products thereof are those that most often cause allergic and sensitivity reactions.

Cereals containing gluten (wheat, rye, barley, oats, spelt, kamut)	**Crustaceans**
Eggs	**Fish**
Peanuts (legumes)	**Soybeans (legumes**)
Milk (including lactose)	**Nuts** (cashew, hazelnut, macadamia nut, Brazil nut, pecan nut and walnut, almond, pistachio)
Celery	**Mustard**
Sesame seeds	**Sulphur dioxide** and **sulphites** at concentrations of more than 10 mg/kg or 10 mg/litre, expressed as SO_2

As a consumer, you can contribute to improved food safety, for example, by using this checklist.

People with severe allergies must be cautious with all foods made from several ingredients because the risk that a food may contain traces of ingredients from other manufacturing processes can never be ruled out completely.

Control Point	Comments	Yes	No	Notes – Evaluation results
1. Insight regarding the degree of sensitivity, reactions and consequences is essential. Do you know about your own- or a family member's sensitivity (allergy/intolerance) when it comes to medical reactions and practical needs?	***Examples of risks for misunderstanding:*** Note that peanuts are not really a "nut" but are a legume. A soy allergy can occur in combination with allergy to other legumes. Pollen allergy can result in allergies to foods as well.			
2. Do you express yourself clearly when asking questions or giving information?	***Examples of risks for misunderstanding:*** If both lactose intolerant people and those allergic to cow milk protein use expressions like "Is it milk-free?" or "I can't drink milk", there is an obvious risk for misunderstanding. Another important distinction is whether a person is allergic to wheat or gluten-intolerant (has coeliac disease).			
3. Do you take risks by eating a food when you are unsure of its content?	***Examples of aids:*** Request a glossary of ingredients from the Swedish Coeliac Association (*Ingredienslexikon*, Svenska Celiakiförbundet). This will enable you to avoid excluding more foods from your diet than necessary. Do not eat a food if you are unsure of its content.			

Control Point	Comments	Yes	No	Notes – Evaluation results
4. Do you always read the ingredient list?	If you answered "No", you are exposing yourself to great risks!! ***Examples of risks for misunderstanding:*** Changes in a food's content is often not marked in any other way but the information given in the ingredient list. Print that is difficult to read can make it impossible to get information about what the product contains – demand legible text!			
5. Do you always demand ingredient lists on food packages?	You should! If you lack information due to unclear labelling, let the staff in your store know. According to new EU labelling rules, the allergens listed on page 1 must always be declared.			
6. Do you ask about the contents of unpackaged foods and food dishes?	Salespersons (at grocery stores and restaurants) are not required to provide a food's content in writing, but when asked must be able to tell you the contents. ***Examples of risks:*** Breading that contains wheat flour is often not visible, nor can thickening agents or oil/fat used in sauces be seen with the naked eye. Pre-baked breads may contain trace amounts of soy flour as a carrier for baking powder. Self-serve food handling at bulk bins, e.g. for sweets or baked goods, can never be completely safe for allergic persons.			

Control Point	Comments	Yes	No	Notes – Evaluation results
7. Are you aware that there is a risk for contamination in food production, i.e. that a product can be exposed to something that it is not supposed to contain?	***Examples of risks:*** A food produced on a production line that is difficult to clean thoroughly, e.g. in the chocolate industry. Raw materials are contaminated at some other point in the handling process, e.g. at harvest, or during transport, storage or packaging. Cross-contamination between wheat, rye, barley, buckwheat, rice, millet and corn is completely legal. Only a PARNUT food, i.e. with the label "…free", is guaranteed to be completely free of a certain allergen. See Control Point 9 (below).			
8. Do you take responsibility for conducting your own risk assessment?	Consumers are responsible for always keeping themselves informed, and should be able to rely on producers/stores/restaurants complying with the provisions of food legislation. One's own sensitivity and the available product information should be the basis for an assessment of potential risks.			

Control Point	Comments	Yes	No	Notes – Evaluation results
9. Are there safe foods for me?	Foods for particular nutritional (known as "PARNUT" foods) are subject to special quality assurance production in accordance with special regulations. Production and sales of these foods must also be registered with the National Food Administration. Note that in the case of severe intolerance/allergy, the only alternative may be PARNUT foods and preparing foods from uncontaminated raw materials. Only a PARNUT food, i.e. labelled "…free", can be guaranteed to be completely free from a certain allergen.			

Date: ……

Name of person who completed checklist: ……