

Experiences on Risk Analysis for Allergens in Finland

Meet the Allergens in Food

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Allergy safety in the food chain

Responsibilities

Food business operators (FBO)

- ✓ accurate information on the composition of food
- ✓ appropriate procedures for preventing contaminant of raw materials and finished products with allergens

Food control authorities

- ✓ audit of the accuracy of the in-house control procedures of the FBO

Consumers

- ✓ concern oneself about the given information



Allergy safety

Responsibilities of FBO

- ✓ FBOs at all stage of the production, processing and distribution within the business under their control shall ensure that foods satisfy requirements of food law relevant to their activities
- ✓ **in-house control system**
 - pre-requisite programme => hazard identification => selection of control measures
 - => improvement of prerequisite programme
 - => critical control point CCP
 - => HACCP-plans
 - implementation and record keeping



Nordic Project 2010-2012

Allergen labelling and use of advisory labelling ***May contain traces of [...]***

- ✓ 2010-2012 Norway, Sweden, Denmark and Finland collaborated an inspection campaign about labelling of allergens and use of advisory labelling
- ✓ **objectives of the project**
 - increase knowledge about allergens
 - encourage FBO to take responsibility for accurate labelling of their products
 - encourage FBO to have appropriate procedures for the use of advisory text *May contain traces of [...]*
 - consumers can trust that labelling is accurate
 - people with allergies can make safe choices
 - greater range of food suitable for people with allergies



Nordic Project 2010-2012

FINLAND

- ✓ training projects for food inspectors
 - legislation, current issues, how the inspections were to be carried out, how the findings were to be reported
 - work shops focused on various inspection situations and how these could be resolved
- ✓ national meetings attended by authorities, the food sector, allergy associations and other relevant stakeholders
- ✓ inspections (47 companies, 87 products)
 - inspection of labellings
 - audit of FBO's in-house control systems



Nordic Project 2010-2013

Outcomes (1)

✓ **product assessment**

- deficient labelling of allergens
 - deficient labelling of allergens according to the allergen list
 - ingredients did not comply with the recipe
- misleading advisory labelling
 - advisory labelling had been used without satisfactory review of the production procedures
 - national labelling and labelling on another language did not correspond



Nordic Project 2010-2013

Outcomes (2)

✓ **audits of the FBO's in-house controls**

- deficiencies in terms of appropriate procedures in the in-house controls for management of allergens
 - consideration of allergens in the risk analysis
 - procedures to prevent contamination of raw materials and finished products with allergens
 - procedures to ensure that premises and equipment were satisfactorily cleaned
- FBO had not sufficiently accepted that allergens are a real danger for certain consumer groups
 - process controls in terms of allergen safety are inadequate, resulting e.g. incorrect labelling and contamination with allergens



Nordic Project 2010-2013

Outcomes (3)

- ✓ **discussion paper and draft criteria for the use of the advisory labelling *May contain traces of [...]***
 - to promote discussion at the national and EU level about the formulation of common guidelines for appropriate use of advisory labelling
 - advisory labelling
 - *May contain traces of [...]*
 - conditions for FBO
 - uncontrollable (impossible to control the entire production process)
 - sporadically occurring



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Actions taken in FINLAND (1)

- ✓ **training projects** for inspectors and FBOs
- ✓ **guidelines**
 - guidelines for food labelling
 - incl. decision making model for the use of advisory labelling in the case of possible contamination
 - guidelines for controlling food labelling
 - guidelines to FBO on withdrawal of foods and on notification to authorities and to consumers
 - instructions for withdrawal due to allergen error



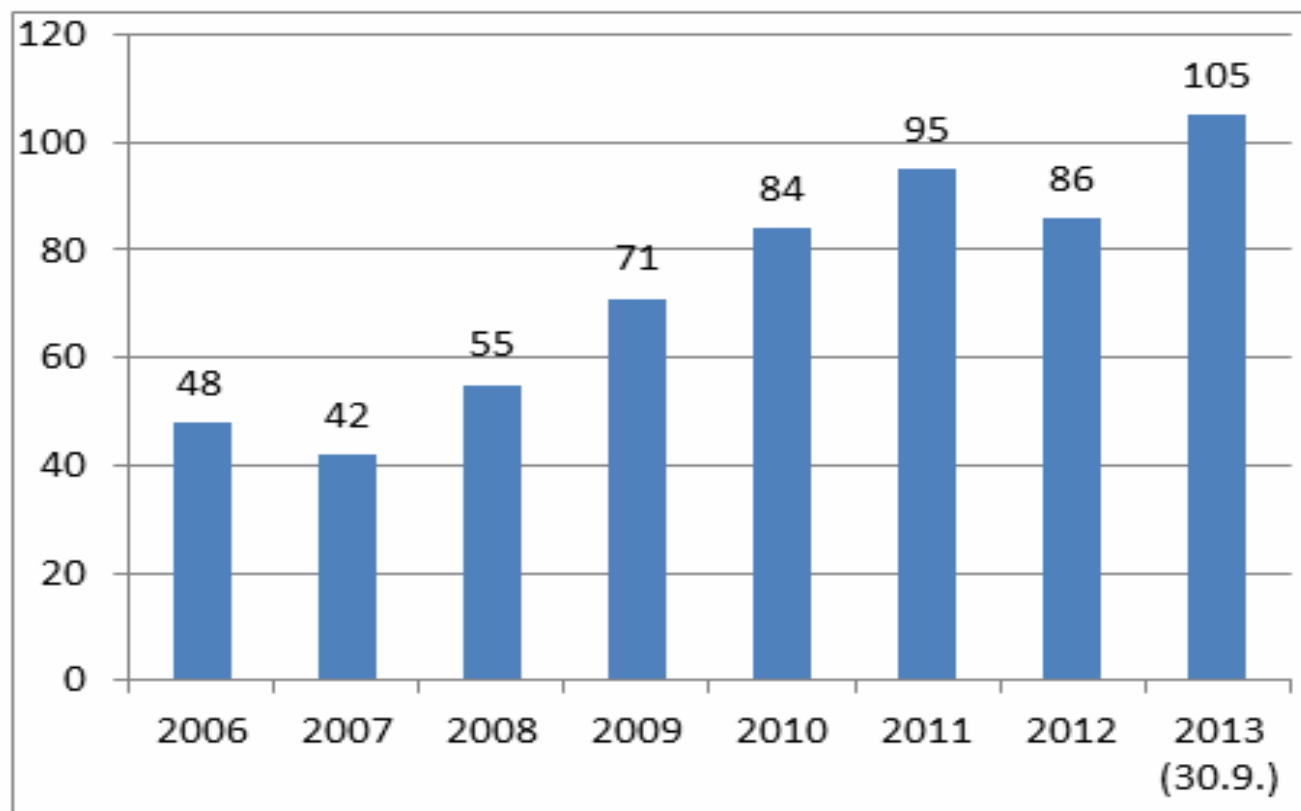
Allergy safety

Actions taken in FINLAND (2)

- ✓ **food safety information publication system Oiva**
 - 1 May 2013 retail shops and restaurants; 2015 all food industry companies
 - inspection results available for consumers; harmonised inspection practises; inspections more focused, faster and risk-oriented
 - allergy safety is included into the Oiva-inspections



Withdrawals of foodstuffs in FINLAND 2006-2013



Elintarvikkeiden takaisinvetojen määrät vuosina 2006–2013



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Actions to be taken in FINLAND (2)

- ✓ **Regulation (EU) Nr 1169/2011 on the food information to consumers:** information on allergens listed in the Annex II of the Regulation is mandatory also for non-prepacked foods, including foods delivered by mass caterers
 - possible approach in FINLAND
 - information on allergens may be given orally (or by electronic media) upon request provided that
 - in a conspicuous place where non-prepacked foods are offered for sale is clearly indicated, that information can be obtained upon request AND information is available in a written (or in an electronic) form for the staff and for control authorities



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Actions to be taken at the EU level

- ✓ **Regulation (EU) Nr 1169/2011 on the food information to consumers - Article 36 para 3**
 - The Commission shall adopt implementing acts on the application of the requirements to the following voluntary food information
 - (a) information on the possible and unintentional presence in food of substances or products causing allergies or intolerances;

...



Thank you!

