

RAPS ALLERGEN-POLICY



Allergens that have to be labelled on products pursuant to Regulation (EU) No 1169/2011 for end customers are managed by the following measures at RAPS.

1. The allergen status of all raw materials that we use is verified. The results are kept in an allergen database that is kept complete and updated.
2. Whenever feasible, raw materials that contain allergens will be removed from formulas or replaced with non-allergenic alternatives.
3. Raw materials are only authorised for production if the associated allergen data is completely available and has been verified.
4. Documented allergen management ensures that the possibility of cross contacts during the production process can be minimised within the scope of Good Manufacturing Practice. Efficiency was validated by PCR analyses throughout the entire production process.
5. As a precaution, an additional risk assessment was carried out throughout the entire process chain by means of comprehensive PCR analyses as part of a far-reaching project. It was shown that the main risk was the failure to control cross contacts at the origin. The concerned individual raw materials were identified and constitute the group of risky raw materials that are currently subject to increased monitoring. The evaluation of the results for our products which are applied as recommended by us is carried out corresponding to the ALTS guidance values. [77./June 2016]
6. Information about the current allergen status of our products will be communicated in a transparent manner to our customers through the specifications and our KIP.

Through the measures described above and the additionally applicable product information, we strive to ensure that our customers receive a binding statement about the allergen status of our products. At this time, however, since there is neither a suitable, economically feasible method of analysis nor a legal foundation for such a comprehensive amount of samples, we dissociate ourselves from the detection of trace amounts on molecular level.

Labelling trace amounts without threshold values, however, is considered counterproductive by affected allergy-sufferers (circular from the Deutscher Allergiebund). We consider it our responsibility as a food producer to continue to work actively towards a solution in the interest of affected people.