Summary of the guidance: Svensk Dagligvaruhandel's requirements and recommendations for the use of allergen warning labelling - PAL

Warning labels for allergens "May contain traces of..." are used to inform about the risk that an allergen may be present as a contaminant in a food product. Internationally, such warning labels are called PAL - Precautionary Allergen Labelling.

Surveys among allergic consumers show that PAL currently lacks credibility and does not help to reduce the risk of allergic reactions. Experience shows that PAL is not always linked to whether there is an actual risk of an allergic reaction. Much work is ongoing in Sweden and internationally to address this. More information on this work can be found in the guidance.

In anticipation of uniform EU legislation, Svensk Dagligvaruhandel, together with its partners, has summarised the requirements and recommendations for better use of PAL so that the labelling is of benefit to allergic consumers. Suppliers and producers of own brand products to any of the Swedish Grocery Federation's member companies are expected:

- Be certified against a food safety standard. This standard must be recognised by the Global Food Safety Initiative (GFSI, see https://mygfsi.com/).
- Have a food safety management system based on one of the established industry guidelines for managing and labelling the presence of allergens (see examples in this guidance).

For the PAL risk assessment

1. Decisions on PALs should be based on a quantitative risk assessment. The mere detection of an allergen in a food, without an evaluation of whether the detected amount could be harmful - a "zero tolerance assessment" - is not an acceptable basis for using the PAL.
2. The reference doses used in the risk assessment are recommended to be at ED01 or ED05 level (the amount at which 1% and 5% of allergic consumers react, respectively).
3. The amount of food used in the risk assessment should be based on what 75% of a population consumes at one time. Other portion/consumption sizes need to be justified.
4. The amount of allergenic protein in a food product needs to be determined (verified) by means of a sampling plan and analysis. The number of samples is affected, for example, by whether the allergen is homogeneously or heterogeneously distributed in the food, or whether a theoretical risk assessment for particulate allergens or VITAL calculations have been carried out.
5. Analytical data should be converted (when necessary) to the total amount of protein in the allergenic ingredient . Currently, ELISA methodology is recommended to enable this, but quantitative PCR or LC-MS methods can also be used when they are developed to give reliable results.
6. Analyses should be performed by laboratories accredited for the above mentioned methods.
7. A safety margin based on the measurement uncertainty of the analytical results shall be used in calculations to assess whether PAL should be used.

If these requirements and recommendations can be met, the PAL - the 'May contain traces of' warning label - will be more credible and will be of great benefit to allergic consumers.

A full version of this guidance is published on https://www.svenskdagligvaruhandel.se/

Authors and reference group: Anders Nilsson (ANFC), Annika Bengtzon (ICA), Ann-Julie Johansson (Menigo), Elise Nassab (Coop), Helena Björck (Axfood/Dagab), Karin Billinger (Martin och Servera), Karin Vigerland (ICA), Mia Broden Borgvall (Lidl), and Mona Lauremann Orheden (Svensk Dagligvaruhandel).