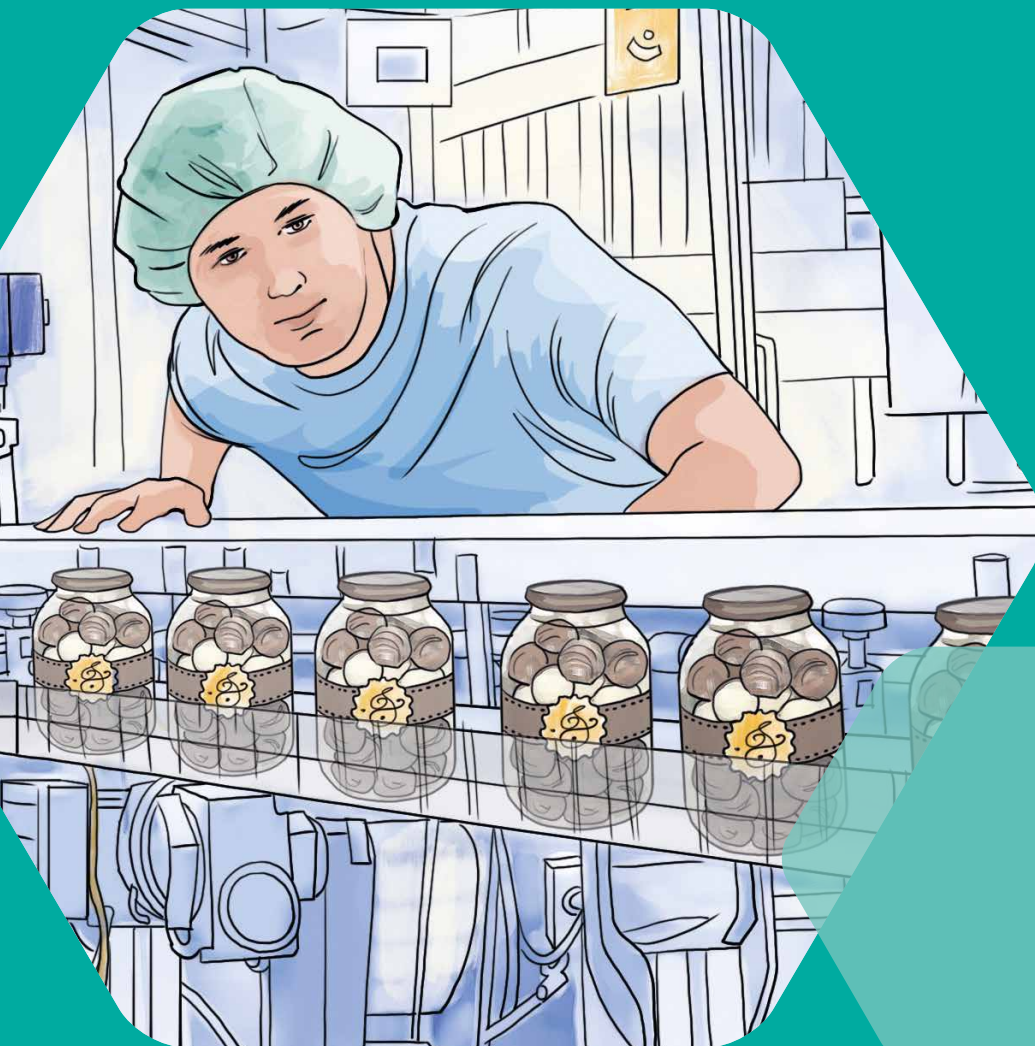


IFS White Paper

References to support allergen management and compliance with IFS requirements



INTRODUCTION

In the context of food safety, food allergies are a major concern that can significantly impact consumers' health. Food suppliers play a vital role in reducing health risks by implementing suitable risk mitigation measures and complying with relevant regulations, especially regarding labelling and declarations.

In the IFS Food Standard, allergen-related topics appear in many requirements. Requirement 4.19 in Part 2, Chapter 4 of the standard directly addresses allergen risk mitigation, comprising three sub-requirements:

- Requirement 4.19.1 calls for a risk assessment,
- Requirement 4.19.2 involves minimising cross-contamination, and
- Requirement 4.19.3 specifies expectations for finished product declaration.

IFS has reviewed publicly available sources to assist suppliers in preparing for their IFS audits concerning these requirements. This document provides a concise summary of relevant sources, contextualises them within the specified IFS requirements, and offers links to these sources, which are available in English, French, Spanish, and Polish. During our research, we found that similar information is, unfortunately, not available in German or Italian.

Please note that legal regulations may vary between countries. Consequently, the papers mentioned should only serve as guides or recommendations for allergen risk management and product declarations.

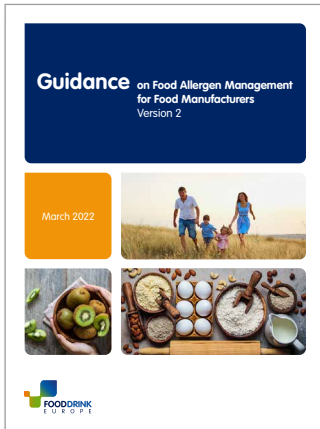
For a complete reference of the requirements discussed, please consult the IFS Food Standard, available for download on our website. In case of any queries regarding the interpretation of IFS Standards and Programs, please email standardmanagement@ifs-certification.com

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SUMMARY OF EXISTING GUIDELINES

Guidance on Food Allergen Management for Food Manufacturers Version 2 Multinational Association: FoodDrinkEurope – March 2022



Target region:	Europe
Language:	English, Spanish (FIAB)
Analytical methods:	ELISA, LFDs, MS, PCR and real-time PCR
Reference doses:	VITAL, iFAAM, EuroPrevall, SCCS
Allergens:	EU-Allergens (regulated in 1169/2011)
Practical examples:	Allergen risk assessment, cleaning protocols, labelling practices, validation and verification



The document details how to conduct a thorough allergen risk assessment (4.19.1) for all raw materials, documenting allergen risks and maintaining up-to-date records of allergenic ingredients (p. 23-25). Furthermore, the guideline provides practical advice on implementing risk-based measures to minimise cross-contamination (4.19.2) throughout the production process, including environment, transport, storage, and personnel management (p. 26-31). The guidance emphasizes accurate and risk-based labelling (4.19.3) of allergens in finished products, ensuring compliance with legal requirements and considering potential cross-contamination (p. 32-34). The guideline provides comprehensive frameworks for allergen risk management, including templates, decision trees, and cleaning validation protocols, alongside best practices for labelling, supplier management, and regulatory compliance.

Allergen Management Guidelines for Food Manufacturers

Canada, Food Allergy Canada, parera and University Laval – September 2022



Target region:	Canada
Language:	English, French
Analytical methods:	ELISA, PCR, LFDs, MS
Reference doses:	VITAL-3, FAO/WHO expert panel
Allergens:	Priority allergens and gluten sources Canada
Practical examples:	Hazard identification, control measures, communication, qualitative and quantitative assessment for PAL, testing programs, cleaning validation

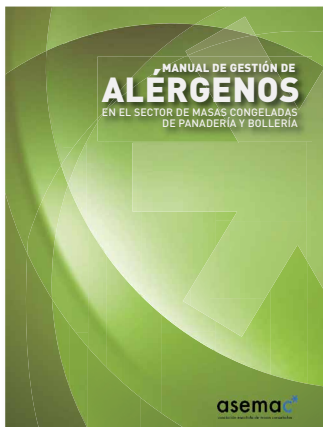


The Canadian Allergen Management Guidelines provides detailed steps for identifying allergens (4.19.1) in raw materials, assessing cross-contamination risks, and maintaining an up-to-date allergen master list, ensuring compliance with country-specific labelling laws (p. 20-22). It outlines risk-based measures to prevent cross-contamination (4.19.2), including cleaning protocols, zoning, personnel training, and monitoring for transport, storage, and production processes, ensuring allergens are controlled from receipt to dispatch (p. 23-28). The document emphasizes evidence-based allergen labelling (4.19.3), leveraging thresholds like ED01 and ED05, to declare accidental or unavoidable cross-contamination and ensure labels are both accurate and legally compliant (p. 29-32). The guideline contains qualitative and quantitative assessment for PAL, multiple flow charts and decision trees. It also provides example templates for hazard identification, supplier checklist as well as analytical allergen testing and sampling.

During the development of this white paper, it became clear that practical guidance documents as the one mentioned are missing in German and Italian.

Manual de gestión de Alérgenos en el sector de masas congeladas de panadería y bollería – Manual for Allergen Management in the Frozen Dough Sector for Bakery and Pastry

Spain, Asociación Española de Fabricantes de Masas Congeladas – 2019



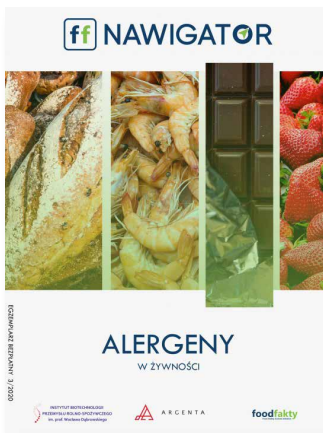
Target region:	Spain
Language:	Spanish
Analytical methods:	ELISA, PCR, LFDs, MS, Biosensors, Microarrays, Rocket immunoelectrophoresis and Western blot
Reference doses:	doesn't link to specific numerical thresholds
Allergens:	EU-Allergens (regulated in 1169/2011) and gluten sources
Practical examples:	Cleaning methods, cross-contamination control, supplier communication, packaging and labelling, training and personal management



The document provides a framework for maintaining up-to-date allergen master lists (4.19.1) and ensuring compliance with country-specific labelling requirements (p. 39-41). Practical examples of cleaning protocols, personnel hygiene, segregation of raw materials, and allergen zoning are detailed to minimise cross-contamination risks (4.19.2). It also outlines the use of environmental controls, such as ventilation systems and positive pressure zones, to reduce airborne allergen spread (p. 43-57). The document highlights the need for precise allergen declarations and labelling (4.19.3), supported by validated analytical methods and risk assessments. It emphasizes proper labelling across all packaging layers, ensuring compliance with legal and consumer safety requirements (p. 45, 50). The manual delivers practical examples and tools for allergen management, including cleaning validation, supplier checklists, labelling decision templates, and compliance guidance tailored to Spanish regulations.

Alergeny w żywności – Food allergens

Poland: foodfakty – March 2020



Target region:	Poland
Language:	Polish
Analytical methods:	ELISA, PCR, LFDs, MS, screening tests
Reference doses:	doesn't link to specific numerical thresholds
Allergens:	EU-Allergens (regulated in 1169/2011)
Practical examples:	Testing for allergens, Planning allergen testing, case study on egg allergens



The document is a valuable tool for food manufacturers since it integrates scientific approaches with operational practices. The document provides guidance on (4.19.1) identifying allergens in raw materials, documenting their risks, and maintaining up-to-date lists of allergenic ingredients and blends, ensuring they meet country-specific labelling requirements (p. 7-9, 13). Also, it outlines risk-based measures (4.19.2) to minimise allergen cross-contamination, including cleaning validation, personnel hygiene, zoning, and monitoring in areas like transport, storage, and production, with practical examples of controls (p. 10-12, 14). The document emphasizes the importance of declaring allergens in compliance with legal standards, using validated testing methods to assess cross-contamination and ensuring labelling (4.19.3) reflects accurate risk-based decisions (p. 15-17). This guide focuses on analytical allergen detection methods like ELISA and PCR, offering case studies, testing templates, and insights into Polish and EU allergen labelling regulations.

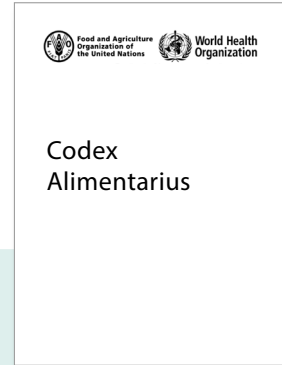
INTERNATIONAL LEGAL BACKGROUND, REPORTS AND BROCHURES



Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers



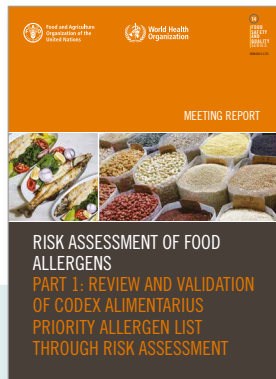
Commission Notice Relating to the provision of information on substances or products causing allergies or intolerances



Code of practice on food allergen management for food business operators



FDA: Food Allergies



FAO/WHO Report Risk assessment of food allergens Part 1-5

Language: English



FAO/WHO Brochures In brief: Food allergens (4 brochures)

Languages: Arabic, Chinese, English, French, Russian



Common abbreviations

ELISA Enzyme-Linked Immunosorbent Assay

LFDs Lateral Flow Devices

MS Mass Spectrometry

PCR Polymerase chain reaction)

VITAL Voluntary Incidental Trace Allergen Labeling

iFAAM Integrated Approaches to Food Allergen and Allergy Risk Management

SCCS Scientific Committee on Consumer Safety

All information provided in this document are summarised to the best knowledge of the authors, but IFS cannot take any responsibility for mistakes, omissions, possible misleading information or endorses any reference values. Legal references are only indications and shall always be double checked. Also, the references are only an introduction to the applicable rules and will be out of date as soon as new regulations apply.

Please report broken links to: Standardmanagement@ifs-certification.com

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