

Allergen Policy of Martin Bauer S.p.a

This policy regarding allergens is part of our HACCP concept within the context of our Quality Management System. In the following our control of the product risks “allergic potential” and “cross contamination with allergens” will be shown for your information.

Legal background

According to Regulation (EU) No. 1169/2011, the following rules regarding labelling of allergens apply:

If a compound ingredient contains an ingredient with allergic potential according to Annex II of Regulation (EU) No. 1169/2011 (FIR) or if this ingredient itself is a potentially allergic ingredient, then it has to be mentioned on data sheet and there must be a reference to the allergic substance. An additional reference is not necessary, if the potentially allergic ingredient can be identified from the name under which the product is sold or from the list of ingredients.

In detail, Annex II of Regulation (EU) No. 1169/2011 contain following food groups:

- 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 SO₂
- Lupine and products thereof
- Molluscs and products thereof

Basic principles of the Martin Bauer Allergen Policy

The following considerations are based on the EU list (as mentioned above). Regulations from other countries (e.g. ALBA list) will be taken into consideration on request of customers only; they are not part of this allergen concept.

Allergens can have an effect in minimal amounts already (**all or none principle**). In the field of occupational health and safety the “0.1% rule” applies. Within the foodstuff sector limits for allergens do not exist. For proofing the absence of allergens, the analytical limit of detection – which is around 1 to 10ppm – will be taken into account. Within the pharmaceutical sector there is no such regulation.

The duty of labelling applies to finished products which are designed for the final customer, not to semi-finished products like those Martin Bauer produces.

Nevertheless, information regarding allergen ingredients according to Annex II of Regulation (EU) No. 1169/2011 will be forwarded to our customers by means of specifications and customer questionnaires, but not via the product itself, e.g. on bulk labels.

Our comprehensive risk analysis according to HACCP covers potentially allergic effects of herbal ingredients (which are not subject to labelling if stated in the list of ingredients) and compound ingredients.

Martin Bauer use in production the foodstuff that could be cross-contaminated with these allergic potential according to the EU Regulation.

- Cereals containing gluten and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Crustaceans and products thereof (*)
- Nuts and products thereof
- Fish and products thereof
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre expressed as SO₂ (flavours, fruit pieces, carriers)
- Soybeans and products thereof
- Molluscs and products thereof

(*) as crustaceans are meant all types of snails and similar that could give false positive in analytical determination.

The following products, which may be used in our production, are according to Regulation (EU) No. 1169/2011 not subject to labelling:

- Maltodextrin/glucose syrup, made of wheat starch and used as carrier substance (powder extracts, flavours)

The following foodstuff groups with allergic potential, which are subject to labelling according Annex II to Regulation (EU) No. 1169/2011, are generally not being processed in Martin Bauer Spa:

- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Milk and products thereof (including lactose)
- Sesame seeds and products thereof
- Lupine and products thereof
- Molluscs and products thereof

Identification – control – information – declaration

1. Purchase

By means of our systematic supplier management we can guarantee that only quality approved raw materials from authorized suppliers with complete documentation will be used within our development and manufacturing processes. Compound ingredients with allergic potential are only purchased if they cannot be purchased free of allergens for technical or sensory reasons.

2. Product development

Due to the strict avoidance policy for potentially allergic substances, such ingredients are used for technical or sensory needs or on customer request only. During development the product development department checks new products for allergens on the basis of supplier statements for compound ingredients.

Information regarding labeling requirements (allergic potential) of samples and new products is fixed electronically and communicated via ingredient lists and customer questionnaires.

3. Storage

In storage areas cross-contamination is prevented by closed and separate containers and comprehensive cleaning concepts.

4. Production

By systematic planning of product sequences and machine occupancy (“block fabrication”) and a reduced occupancy of machines during production the risk for cross-contamination is eliminated. According to our experience, our established cleaning procedures guarantee a sufficient protection against cross-contamination.

By comprehensive aspiration systems formation of dust is reduced to a minimum.

5. Labelling

All products are clearly labeled. Potential risk are considered in a procedure within the context of our HACCP System. Therefore multiple checks of bulk labelling are performed during production.

6. Data sheet

In case of systematic detection of presence of allergic potential how contamination of herbal, we indicated it in data sheet.

7. Conclusion

Raw material, cut product, aromatic natural preparation

Martin Bauer does operate documented procedures for identification, control, avoidance, traceability and information regarding product risks related to allergens.

Cross-contamination in production and storage areas is prevented by manifold prerequisite programs.

We would like to point out that our measures regarding risk control and risk reduction can't allow to guarantee total absence of any potentially allergenic substances: our herbal product could get on field/wild allergens contamination.

Herbal tea

Martin Bauer does operate documented procedures for identification, control, avoidance, traceability and information regarding product risks related to allergens. Cross-contamination in production and storage areas is prevented by manifold prerequisite programs.

Nevertheless, we cannot guarantee – in spite of our comprehensive measures concerning risk control and risk reduction – total absence of any potentially allergenic substance as we handle natural products.

Therefore we do ensure absence of allergic substances according to Annex II of Regulation (EU) No. 1169/2011, unless they are stated in the ingredient list or a separate advice. Technically unavoidable traces have to be excluded thereof.

Martin Bauer S.p.a.

This document replaces all our previous editions.