



Association of Manufacturers and Formulators of Enzyme Products

FOC/04/107

23 September 2004

**Amfep statement on  
fermentation derived enzymes and food allergy labelling**

The labelling of food within the EU is regulated by Directive 2000/13 and Directive 2003/89 (1,2).

Directive 2003/89 sets up detailed rules for the labelling of certain food ingredients having the potential to cause allergies in consumers. These ingredients are listed below (3).

Most commercial food enzymes are produced by fermentation with the help of selected micro-organisms. For the growth of such micro-organisms a variety of nutrients are used, which may include some of the ingredients listed below.

In a letter to Amfep dated June 22, 2004 (see appendix) the European Commission confirms Amfep's opinion that ingredients used in the fermentation of enzymes to be used as processing aids are outside the scope of the abovementioned Directive 2003/89.

This means that

If any of the ingredients listed are used in the fermentation of an enzyme product, used as processing aid, these ingredients need not be labelled on the final foodstuff.

If any of the ingredients listed are used in production steps after fermentation (like formulation) these ingredients must be labelled on the final foodstuff, unless such an ingredient has obtained a provisionally exemption as foreseen by the abovementioned Directive 2003/89.

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*References:*

1. Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labeling, presentation and advertising of foodstuffs.
2. Directive 2003/89/EC of the European Parliament and of the Council of 10 November 2003 amending Directive 2000/13/EC as regards indication of the ingredients present in foodstuffs.

3. List of ingredients:

Cereals containing gluten (i.e. wheat, rye, barley, oats, spelt, kamut or their hybridized 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 and products thereof

Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre as SO<sub>2</sub>

*Appendix:*

1. European Commission (DG SANCO) letter dd 22 June 2004