

SONNEVELD AND FOOD SAFETY



INTRODUCTION

The launch of the European General Food Law (GFL) is the starting point for a number of measures to safeguard food safety. The GFL is the basis for European laws and regulations that have huge influence on the functioning of companies in the food industry.

Food safety revolves around risk management. The Sonneveld Group wishes to do more than just comply with the legislation. They wish to fulfil a precursor role in the field of food safety.

Sonneveld has, anticipating on the new laws and regulations, established their own standards that are for the largest part more stringent than the imposed standards. Previously, there have been substantial investments in systems and automations to organise internal processes in such ways that the dangers for food safety are banned as much as possible. This is also of the utmost importance for you.

The measures taken by Sonneveld are aimed at:

- Limiting the risks
- A fast solution should a problems arise in spite of all precautions
- Support of customers in the marsh of laws and regulations

The European laws and regulations apply to all links of the chain. In practice, you are confronted with the same questions as we are. You can take advantage of the head start that Sonneveld has reached by their early anticipation on the new legislation. We gladly share the knowledge that we have gained in this respect.

All information on the approach of Sonneveld in the field of food safety has been bundled in this booklet. It's a handy reference work that sketches in broad outline what plays at this moment in the chain and what the policy of Sonneveld is in this respect.

The legislation and issuing of regulations is in constant movement. The Quality Assurance department devotes much energy in a continuous update of data.

This means among other that you can also in the future rely on the fact that Sonneveld complies with all regulations, and that they can actively anticipate new developments.

General Food Law / Tracking & Tracing

The General Food Law (EU Ordinance no. 178/2002, 28 January 2002) of the European Union holds the general principles and regulations of the food law, the installation of a European Authority for food safety and procedures for food safety issues.

One part of the GFL is Tracking & Tracing.

The most important aspects of Tracking & Tracing:

- as from 1 January 2005, all producers of food must avail of a system that can trace one step forwards and one step back. The minimum data requirements of this system are: name and address of the supplier, the kind of product delivered, name and address of the purchaser and the delivery date;
- the producer must be able to supply the tractability data within four hours;
- a storage duty of minimum five years applies to these data, except when a shelf life system is in place. In this case, it is recommended to keep the data available until six months following this period;
- when an unsafe product is put in the market, or when an unsafe product, for instance as a raw material, is received, these products must be taken off the market and this must be reported to the Food and Goods Authority.

Our point of view

Tracking & Tracing is an obligation emerging from the GFL. For Sonneveld this is not taken as an aim as such. We strive in all our internal processes to guarantee quality. These internal processes are installed as efficient as possible, meaning that Tracking & Tracing at Sonneveld is an automatic matter of fact.

Status at Sonneveld

By means of advanced atomisation we have speedy access to all information involving our products. Tracking & Tracing is done at within the imposed 4 hours.

With this, we comply with the legislation and Sonneveld continues striving for improvements that optimize Tracking & Tracing.

Customer support

- Batch numbers can be mentioned on the invoice at your request.
- For all the raw materials you use, you can request the product specifications.

GMO (genetically modified organism)

New GMO-legislation:

Ordinance (EU) No. 1829/2003 (18 April 2004): concerning genetically modified foods and animal feed.

Ordinance (EU) No. 1830/2003 (15 April 2004): concerning the tractability and labelling of genetically modified organisms and the tractability of food and animal feed produced with genetically modified organisms.

Important changes in relation to the earlier legislation:

- Principle of demonstrability: all products originating from GMO are labelled, irrespective whether genetic material is demonstrable or not.
- Threshold value: decreased from 1% towards 0,9%. The supplier must be able to demonstrate that this presence was unintentional and inevitable.
- Pipeline GMO: is a GMO that was judged safe (by the EFSA) but that has not yet been allowed (by the member states). For these a threshold value of max. 0,5% is imposed. Above this value it cannot be entered in the market.
- Labelling duty: It must be clearly indicated on the label that a product is a GMO is or contains one, or whether it is derived from GMO.
- Tractability: it must be possible to follow GMO throughout the whole chain. A storing duty of 5 years applies to all documents.

Our point of view

Sonneveld does not want to be obliged to declare GMO. That's the reason why Sonneveld does not use ingredients that must be declared as GMO.

Status at Sonneveld

Sonneveld has non-GMO declarations in conformity with the new legislation for all raw materials.

Customer support

- You can request the product specifications of the raw materials that you use. Here, you will find all product information.
- Sonneveld avails of a standard GMO declaration that will be sent to you upon request.

Change of the labelling directive

Concerns: Directive 2003/89/EG of 10 November 2003 changing the labelling directive 2000/13/EG. At the latest on 25 November 2004, all national legislations must be adapted. The 25th of November 2005, all products must comply with the changed labelling directive.

Part 1: Allergens legislation

Allergen ingredients must obligatory be mentioned. The allergen ingredients are listed in the new annex (III bis) of the labelling directive. The 12 allergens are: gluten containing grains (i.a. rye, wheat, barley), shellfish, eggs, fish, peanuts, soy, milk, nuts, celery, mustard, sesame seed, sulphur dioxide and sulphites in concentrations over 10 mg/kg SO₂.

The EU directive mentions 12 allergens that must be mentioned on the label, but consciously disregards cross-pollination. The ALBA list (TNO database) however mentions of all 39 formulated allergens the presence or the absence of possible cross-pollination by means of a question mark.

Our point of view

Our starting point is to actively exclude certain allergens, meaning that the risk for our customers is reduced.

Status at Sonneveld

Sonneveld complies with the new directive since 25 November 2004. We mention allergen sources in our product specifications.

Customer support

- You can request the product specifications of the raw materials that you use. The compulsory allergens are taken in the ingredient declaration. Besides this, the product specification also includes the ALBA list.

Changes in the labelling directive

Concerns: Directive 2003/89/EG of 10 November 2003 changing the labelling directive 2000/13/EG. At the latest at 25 November 2004 the national legislations must be adapted. On the 25th of November 2005, all products must comply with the changed labelling directive.

Part 2: Abolition 25%- rule

The stipulation that the components of compound ingredients must not be mentioned in case the compound ingredient is present in the final product for less than 25%, expires with Directive 2003/89/EG. The compounds must all be mentioned individually, except in case the compound ingredient constitutes less than 2% of the final product and it does not concern an allergen.

For instance: fruit filling in a donut was declared before as fruit filling; now the ingredients of the fruit filling must be mentioned separately, in sequence of decreasing quantity. To be able to do this, our customer needs extra information from his suppliers.

Our point of view

Our customers are confronted with the abolition of the 25% rule. This is the reason why Sonneveld adapted their product specifications already in 2004, meaning that our customer has the correct information at his disposal. Our product specifications now show rounded percentages. This enables our customer to compile his labels.

The Voedsel en Waren Autoriteit (VWA) (Food and Goods Authority) will control the compliance to the formulated rules as from 1 April next.

Status at Sonneveld

Sonneveld always declares all ingredients. This means that for Sonneveld the abolition of the 25% rule has no consequences.

Client support

- You can request product specifications of the raw materials you use. There you will find all product information.

TFA (Trans Fatty Acids)

New Danish legislation, Decree N° 160 of 11 March 2003, concerning trans fatty acids (TFA).

Since 1 June 2003 a new Danish legislation has come into force in which limits are given for the proportion of trans fatty acids in (partially) hardened vegetable oils and fats. Trans fatty acids originate during the hardening of fats. Research showed that trans fatty acids can be the cause of developing heart and vascular diseases. The new legislation for Denmark only applies to vegetable oils and fats, not on animal oils/fats.

The standard is maximum 2 gram TFA per 100 gram oil or fat in the end product. Additional, products that are presented as “free from trans fatty acids” can contain a maximum of 1 gram per 100 gram oil or fat.

Our point of view

Sonneveld does not await European legislation, but strives in the course of 2005 towards an average of TFA ≤ 1 .

Status at Sonneveld

To support our customer, the percentage TFA must be decreased without this resulting in an increase in saturated fats. Where necessary, Sonneveld will move to raw materials with a lower TFA-ratio. Of all raw materials concerned, the TFA values are known, and these are mentioned on the product specifications.

Client support

- You can request the product specifications of the raw materials you use. TFA values are mentioned in the food-value listing.

Dust covenant

It is general knowledge that exposure to flour dust (wheat, rye and alpha-amylase) can lead to allergic reactions. In 1999 it was decided to formulate dust reduction aims for the complete sector using an Arbo-covenant. For the bakery raw materials industry this covenant comprises of the following objectives:

- PAGO within 2 years (periodical health check) for employees.
- Personal means of protection for tasks and work to be defined later.
- Decrease the exposure to flour dust with 10% after 1 year, up to 50% after 4 years (compared to 0-measuring).
- The company must avail of an action plan.
- Concerning dust, bread improvers and bread mixers on the Dutch market must rate under the standard of 1000 mg/kg.

All Sonneveld products in powder form comply with the demands imposed in the Arbo-covenant to prevent raw materials allergy.

Certificates

Food safety is inextricably bound up with HACCP (Hazard Analysis Critical Control Points), a methodology that enables since many years a structural safeguard of this safety. Originally, BRC is an initiative of the English supermarkets to reach consistent testing criteria. The purpose of BRC is to draw up an independent inspection report on the basis of which supermarkets can decide themselves whether the producer is suitable.

Sonneveld was granted both the HACCP as well as the BRC higher level certificate. This is a proof of our good implementation and execution including every legislation and regulation concerning food safety.

Sonneveld strives towards a cooperation with suppliers that are at least HACCP and preferably also BRC certified. Sonneveld is also certified ISO9001. This guarantees the control of processes in general. BRC and HACCP are specific certificates concerning food safety. The HACCP and the BCR higher level certificate can be requested at Sonneveld.

Safeguard for raw materials danger

Sonneveld can proof the safeguard of relevant raw material dangers (such as mycotoxins, heavy metals, micro-biological dangers): this information is familiar to us.

The safeguarding of raw materials against dangers is present in the whole chain. In an audit conducted in July 2004 we were as the first raw materials supplier assessed positively by the NVB (de Nederlandse Vereniging van Bakkerijen – the Dutch Association of Bakeries). This was moreover the first audit by the NVB. The results of our raw materials are processed in a central database and can be asked for at the NVB by our clients.