



FOOD STANDARDS  
Australia New Zealand  
Te Mana Kounga Kai – Ahitereiria me Aotearoa

# P.E.A.L.

**PLAIN ENGLISH ALLERGEN LABELLING**

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FAMS 2019

# Overview



1. Brief tour of the Code



2. What is Plain English Allergen Labelling?

*... and what is FSANZ doing about it?*



3. Proposal P1044 –  
Project Status



# About FSANZ

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- Our main function is to develop and administer the Australia New Zealand Food Standards Code
- The Code is a legislative instrument, that is given effect by Australian state and territory and New Zealand laws
- Not responsible for enforcement

# Brief tour of the Code

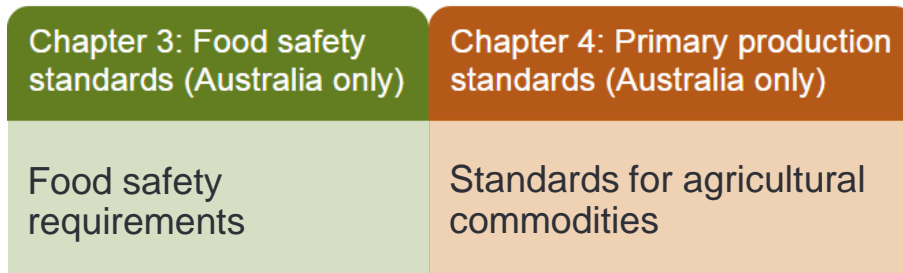


# THE FOOD STANDARDS CODE

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Allergen labelling  
requirements found here



The Code requires  
allergens to be  
declared, but no  
mention of how to  
declare

# Standard 1.2.3 Declarations

## Cereals containing gluten

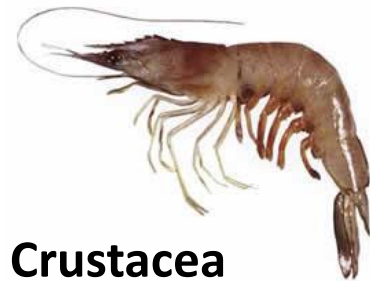
(namely wheat, barley, rye, oats and hybrids)



**Lupin**



**Peanut**



**Crustacea**

**Soy**



**Milk**



**Egg**

**Tree nuts**



**Sesame Seed**



**Sulphites**



**Fish**

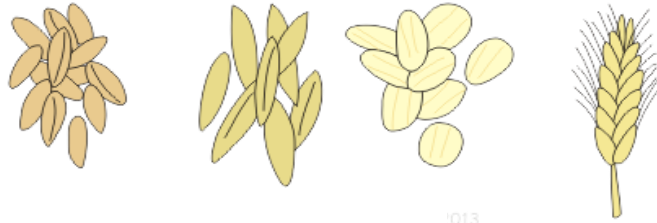
# What is Plain English Allergen Labelling?



# Why PEAL is needed

VAGUE

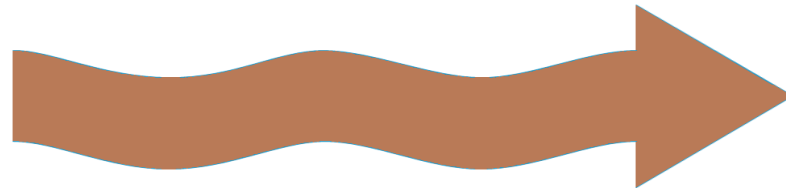
“Cereals containing gluten”



E.g. “Wheat”



Problem  
examples



Clear  
Unambiguous  
Identifiable

TECHNICAL

“Sodium caseinate”



“Milk”





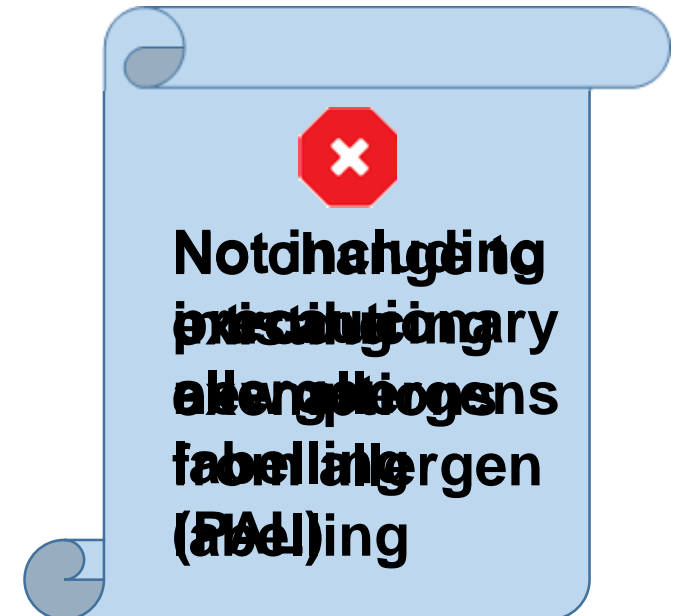
# Proposal P1044 – PEAL

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- Provide clarity and consistency in allergen declaration requirements
- Require PEAL as a means of improving allergen information for consumers.

## Scope

- ✓ Terms for declarations
- ✓ Location of declarations
- ✓ Formatting issues will now be included in the scope



# Project Status



# Consultation

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- FSANZ released a Call for Submissions paper for public comment 1 March to 10 May 2018.
- 42 submissions received.



## Main issues raised

Support for the introduction of PEAL into the Code (i.e. the status quo is unsustainable).

Most submitters supported prescribed plain English terms. Several industry submitters preferred a non-specific requirement that would refer to the need for PEAL.



# Work Activities

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- Updated safety assessment
- Consumer behaviour assessment
- Regulatory impact statement
- Draft changes to the Code

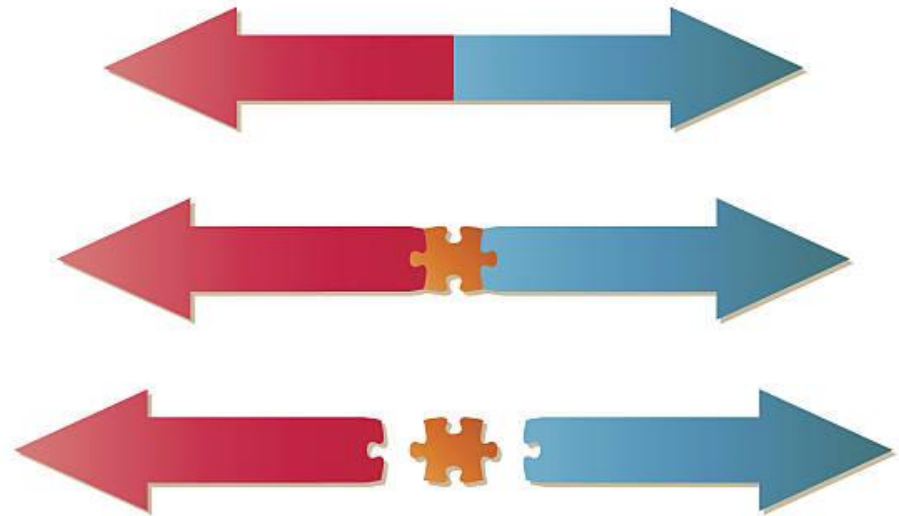


# Findings - safety

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Strong evidence that the following are separate allergies:

- Wheat
- Molluscs
- Individual tree nuts



**Strong support for separate declarations**

# Findings – consistency

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Allergen labelling should be consistent across foods

- Consistent terminology
- Consistent location for allergen declarations.

Consumer research shows use of same, simple and specific terms:

- enhances allergen identification
- and results precautionary action

# Timelines

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2019

- Public consultation second half of year

2020

- Finalisation of Proposal P1044
- FSANZ Board consideration

2020

- Consideration by Australia and New Zealand Ministerial Forum on Food Regulation
- 60 day period to consider.

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