

# Allergen Bureau

## Food Industry Guide to Allergen Management and Labelling

Lisa Warren Allergen Bureau

AIFST Plain English Allergen Labelling – Webinar #2

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A circular inset image showing a man in a light blue shirt and grey jacket standing in a supermarket aisle. He is looking down at a product on a shelf, with his hand near it. He is also holding a smartphone in his other hand. The aisle is filled with various food products on shelves.

Informing the  
food industry

# Allergen Bureau

- **Peak industry body** representing food industry allergen management
- **Membership based** organisation established to provide food industry with rapid responses to questions about allergen risk management in food ingredients & manufactured foods
- Established 2005, **pre-competitive**, **'not-for-profit'**, Allergen Bureau directors provide voluntary, unpaid services

## Global Members



## Full Members



ALDI Stores  
BFF Hull Limited  
Cargill Protein Europe

Lindt & Sprüngli Australia  
SoFine Foods

# Vision & Mission

**Vision:** A trusted food supply for allergen sensitive consumers around the world.

**Mission:** Lead the global food industry in best practice allergen management, sharing information that builds trust and transparency that supports allergen sensitive consumers to make informed choices.



# A New Website Platform

Introducing our new & improved corporate website [allergenbureau.net](https://allergenbureau.net), & brand-new website platform for [VITAL® Online](#).

- interactive news & events pages
- easy search functions
- updated industry FAQs
- conference presentations
- free helpline service



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Supporting industry  
to manage the risks  
of food allergens  
in the interests  
of consumers.





## Industry Guidance

# Industry Guidance in 3 Steps

*Easy*  
Step-by-step  
industry  
guidance

1

3

2

*Informing the food industry*

1. Food Industry Guide to Allergen Management and Labelling for Australia and New Zealand – PEAL updated edition
2. Allergen Bureau's Allergen Risk Review Website
3. Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL<sup>®</sup>) Program



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Bureau

Figure 3. Examples of summary statement loc

Preferred format - the summary statement is b

**Ingredients**  
Water, vegetable  
thickener (1412),  
flavour (wheat m  
Contains: egg, al

Alternative formats - the summary statement is

**Ingredients**  
Water, vegetable oil, vinegar, Contai  
egg, female parts,  
capsicum, salt, egg yolk, all  
thickener (1412), almonds, milk,  
parmesan cheese (milk),  
garlic, wheat flour, flavour,  
gluten  
wheat multivitamin, sesame  
oil, antioxidant (202)

Alternative format for labels with very limited

between the statement of ingredients and the su

**INGREDIENTS:** Water, vegetable oil, vi  
peas, capsicum, salt, egg yolk, thick  
parmesan cheese (milk), garlic, wheat  
multivitamin, sesame oil, antioxidant (2  
Contains: egg, almond, milk, wheat,

#### Terminology

The required names for summary statement  
for soybean and cereals containing gluten,  
same as those in the statement of ingredier  
are listed in Column 4 of the table to sector  
The following example shows how the requ  
can be presented in a statement of ingredie  
summary statement using the required nam

Example: Ingredient list for Frozen Green V  
Mix:

**Ingredients**  
Green beans, sugar snap peas, edamame  
(soybean).  
Contains: soy.

Note that soy, soy and soybean are requir  
in the statement of ingredients, but not in th  
statement where soy is the only permitted n  
name.

## 2021 Food Industry Guide to Allergen Management and Labelling

For Australia and New Zealand

PEAL  
updated

A partnership document of the  
Australian Food and Grocery Council and the Allergen Bureau

# Essential allergen guidance for the ANZ food business operator



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# How do I apply PEAL?

# How much time do we have?

- PEAL regulation started 25 Feb 2021
- food can be sold with either old or new allergen labelling up to 25 Feb 2024
- food packaged & labelled with old allergen info before 26 Feb 2024 may still be sold until 26 Feb 2026
- see [www.foodstandards.gov.au](http://www.foodstandards.gov.au)

## Standard 1.2.3

## Information requirements – warning statements, advisory statements and declarations

### Food Standards (Proposal P1044 – Plain English Allergen Labelling) Variation

Item [3] of the Schedule	197	F2021L00145 24 Feb 2021 FSC138 25 Feb 2021	Clause 4	Clause 4 a transitional arrangement for variations to the Code made by Item [3.1], [3.2], [3.3], [3.4] and [3.5] of the Schedule.  The transition period is the period of time that commences on 25 February 2021 and ends on 25 February 2024.  The post-transition period is the period of time that commences 26 February 2024 and ends on 26 February 2026.
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# PEAL applies to which food?

All of them!

- packaged foods for retail sale
- foods not required to bear a label
- foods sold to caterers
- all other sales of food
- imported foods

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Continued... Table 3 Allergen declaration requirements for various foods being offered for sale.

Examples of foods being offered for sale	Allergen declaration requirements (If allergens are not present, then an allergen declaration is not required.)
<p>Packaged foods for retail sale not requiring a statement of ingredients [refer to Code section 1.2.4—2]. An allergen declaration should be printed on the packaging. Examples of these foods include:</p> <ul style="list-style-type: none"> <li>• individual portion packs [also refer to Code section 1.2.1—6]</li> <li>• foods contained in small packages [defined in Code Standard 1.1.2]</li> <li>• packaged and labelled water [also refer to Standard 2.6.2]</li> <li>• standardised alcoholic beverages [defined in Code Standard 1.1.2].</li> </ul> <p>Foods not required to bear a label (examples are provided in Table 1) [refer to Code Standard 1.2.1]. The allergen declaration should accompany (for example using ink jet or digitally printed labels) or be displayed with the food.</p> <p>Food that is sold to caterers [refer to Code Standard 1.2.1 Division 3]. Allergen declarations are provided to the caterer with the food either on a label or in documentation.</p> <p>All other sales of food (including intra-company transfer) [refer to Code Standard 1.2.1 Division 4].</p>	<p>The food requires an allergen declaration.</p> <ul style="list-style-type: none"> <li>• Format and location requirements do not apply.</li> <li>• Required names from Column 4 of the table to section S9-3 apply.</li> </ul>
<p>Foods for special medical purposes or certain infant formula products [refer to the Code subsection 1.2.3—6 (4)].</p>	<p>The food requires an allergen declaration.</p> <ul style="list-style-type: none"> <li>• Format and location requirements do not apply.</li> <li>• Required names do not apply. Names from Column 1 of the table to section S9-3 or any other name by which the allergen is commonly known applies.</li> </ul>
<p>Foods where the possible presence of cross contact allergens has been established and a risk assessment has determined that a precautionary allergen labelling statement is necessary. Refer to section 4.1.11 in this Guide.</p>	<p>A precautionary allergen labelling statement is recommended.</p> <ul style="list-style-type: none"> <li>• Precautionary allergen labelling statements are voluntary.</li> <li>• For consistency, required names from Column 3 of the table to section S9-3 are recommended.</li> </ul>

Some packages can display an allergen declaration which is neither a statement of ingredients nor a summary statement. An example is an individual portion pack with an allergen declaration ink jetted onto the sachet. The Code does not require bolding for declarations on individual portion packs, and in this example, ink jetting in bold could make the text more difficult to read.



# Ingredient list format?

- format, location & terminology requirements are in the Code
- preferred format for industry consistency
- statement of ingredients declare allergens using required names in bold
- summary statement are mandatory
- PAL statements (when determined through a science based risk assessment process) are important

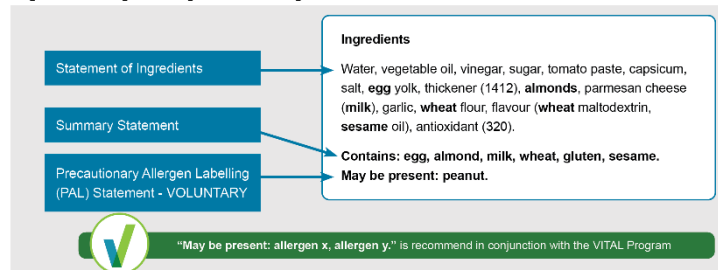
## 4.1.1 RECOMMENDED ALLERGEN LABELLING FORMAT

In this Guide an 'ingredient list' is a collective term which represents up to three labelling elements.

1. a mandatory statement of ingredients (refer to Code Standard 1.2.4 *Information requirements – statement of ingredients*); and
2. a mandatory summary statement (refer to Code section 1.2.3—4 *Mandatory declarations of certain foods*); and
3. a voluntary precautionary allergen labelling statement (refer to section 4.1.11 in this Guide).

The three elements work together to provide consumers with clear and consistent allergen labelling.

Figure 2. The allergen labelling elements of an ingredient list.



## 4.1.2 UNDERSTAND THE ALLERGENIC NATURE OF INGREDIENTS

To declare ingredients that are (or contain) allergens accurately, FBOs should be aware of the nature of the ingredients used in their products. In addition to allergens being present in ingredients, components in compound ingredients, additives and processing aids, allergens may also be present from carry-over, agricultural co-mingling, or cross contact. For more information, refer to the Allergen Bureau's Unexpected Allergens in Food which is a document that provides the food industry with a list of foods, ingredients and raw materials that may unexpectedly contain allergens, and a list of questions FBOs can ask their suppliers to support their allergen risk review process.

**In Australia and New Zealand, regardless of the nature of the allergen, in most cases, if it is present in a food for sale, it must be declared.**

Apart from sulphites, the allergens listed the table to section S9-3 are proteins. Depending on the food processing method, proteins can change (for example, denaturation due to extreme pH or heating). It should

not be assumed that normal food manufacturing processes will make the proteins less allergenic. Foods and ingredients that contain denatured proteins can still trigger an allergic reaction in a consumer with food allergy. Also, if manufacturing processes result in the allergen protein not being detected by analytical means, it cannot be assumed that the allergen is not present. An example is a fermented food where the allergen may be difficult to detect using some analytical methods because the structure of the protein has changed.

Some ingredients undergo processes which remove most of the allergenic proteins. Unless these ingredients meet the requirements for an allergen labelling exemption, the allergenic source of these ingredients must be declared irrespective of how highly refined or processed they may be. An example of a material that can be highly processed is wheat, where wheat declaration would apply equally to wheat flour, wheat starch, wheat maltodextrins and caramel derived from wheat.

Chapter 4: Allergen Labelling & Communication

### Wheat and cereals containing gluten

The table to section 58-3 lists four cereals containing gluten (wheat, barley, rye, oats or their hybrids) that must be declared when present. The required name 'gluten' is displayed in the summary statement to inform individuals with coeliac disease or dermatitis herpetiformis that the food contains gluten. The inclusion of the specific name of the cereal containing gluten displayed in the statement of ingredients provides additional information to consumers about the source of cereal containing gluten. Except for 'wheat', specific cereal names cannot be displayed in the summary statement.

Example where barley is present in a food.

**Ingredients**  
barley

**Contains:** gluten.

The required name 'wheat' is displayed in the statement of ingredients and the summary statement to inform individuals who have wheat allergy that wheat is present. Gluten is displayed in the summary statement to inform consumers of the presence of gluten.

Example where wheat is present in a food.

**Ingredients**  
wheat

**Contains:** wheat, gluten.

There are two main types of wheat (of the genus Triticum) grown in Australia and New Zealand: bread wheat and durum wheat, and although less commonly grown, there are several other species of wheat from the same genus often considered to be 'ancient wheat' such as spelt, Kamut®, khosian wheat, emmer, farro, emmer, and freekeh. Where these foods are present, wheat must be declared.

Example where spelt is present in a food.

**Ingredients**  
spelt (wheat)

**Contains:** wheat, gluten.

For hybridised strains of wheat such as triticale (which is a hybrid of wheat and rye) both the required names are declared in the statement of ingredients, but specific cereal names (except for wheat) cannot be displayed in the summary statement.

Example where a hybridised strain of wheat and rye is present in a food.

**Ingredients**  
triticale (wheat, rye)

**Contains:** wheat, gluten.

For wheat processed into the ingredient wheat gluten, the term gluten is not a required name in the statement of ingredients and therefore is not bolded.

Example where wheat gluten is added to a food.

**Ingredients**  
wheat gluten

**Contains:** wheat, gluten.

### Soybean

The required names 'soy', 'soya' or 'soybean' may be used in the statement of ingredients, however, the required name 'soy' must be declared in the summary statement.

Example where soybean is present in a food.

**Ingredients**  
soybeans

**Contains:** soy.

If soybean oil meets the allergen labelling exemption conditions set out in Column 2 of the table to section 58-3 (for example it has been degummed, neutralised, bleached, and deodorised) soy is not a required name and neither bolding or a summary statement are required.

Example where soybean oil (which meets the requirements for the exemption) is added to a food.

**Ingredients**  
vegetable oil

Or alternatively

**Ingredients**  
soybean oil

### Tree nuts

The table to section 58-3 lists the required names for the nine tree nuts (almonds, Brazil nuts, cashews, hazelnuts, macadamias, pecans, pine nuts, pistachios, and walnuts). These are considered by FSANZ to be tree nuts of public health significance for allergies in Australia and New Zealand. A declaration is always required for these tree nuts, or derivatives of these tree nuts (such as oils). Coconut and nutmeg and tree nuts such as chestnut, pit nut, shea nut, illipe nut, and hickory nut are not included in the table and therefore do not have required names.

Example where coconut, pecans and almonds are present in a food.

**Ingredients**  
coconut, pecans, almonds

**Contains:** pecan, almond.



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# How to apply 'required names'?

Required names are specified terms (in plain English) that must be used for declaring allergens in foods.

## FIGAML

- provides information about each allergen
- shows examples how a required name is declared

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Figure 3. Examples of summary statement locations.

**Preferred format** - the summary statement is below, and distinctly separated from, the statement of ingredients.

**Ingredients**  
Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, egg yolk, thickener (1412), almonds, parmesan cheese (milk), garlic, wheat flour, flavour (wheat maltodextrin, sesame oil), antioxidant (320).

**Contains:** egg, almond, milk, wheat, gluten, sesame.

**Alternative formats** - the summary statement is next to, and distinctly separated from, the statement of ingredients

**Ingredients**  
Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, egg yolk, thickener (1412), almonds, parmesan cheese (milk), garlic, wheat flour, flavour (wheat maltodextrin, sesame oil), antioxidant (320).

**Contains:** egg, almond, milk, wheat, gluten, sesame.

**Contains:** egg, almond, milk, wheat, gluten, sesame.

**Ingredients**  
Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, egg yolk, thickener (1412), almonds, parmesan cheese (milk), garlic, wheat flour, flavour (wheat maltodextrin, sesame oil), antioxidant (320).

**Alternative format for labels with very limited space** - the summary statement is in a box, providing a distinct separation between the statement of ingredients and the summary statement.

INGREDIENTS: Water, vegetable oil, vinegar, sugar, tomato paste, capsicum, salt, egg yolk, thickener (1412), almonds, parmesan cheese (milk), garlic, wheat flour, flavour (wheat maltodextrin, sesame oil), antioxidant (320).

**Contains:** egg, almond, milk, wheat, gluten, sesame.

### Terminology

The required names for summary statements, except for soybean and cereals containing gluten, are the same as those in the statement of ingredients. These are listed in Column 4 of the table to section S9-3. The following example shows how the required names can be presented in a statement of ingredients and summary statement using the required names.

Example: Ingredient list for Frozen Green Vegetable Mix.

**Ingredients**  
Green beans, sugar snap peas, edamame (soybean).

**Contains:** soy.

Note that soy, soya and soybean are required names in the statement of ingredients, but not in the summary statement where soy is the only permitted required name.

Foods that are not listed in the table to section S9-3 are not required names. In this next example, pistachio nuts are a tree nut and shea nut butter, of a tree nut, they are not included in the list of ingredients with required names and therefore not declared as set out in Standard 1.2.3—4. However, they are ingredients and therefore must be declared in the ingredient list as per Standard 1.2.1.

Example: Ingredient list for Nutty Fudge.

**Ingredients**  
Condensed milk, shea nut butter, sugar, pistachio nuts, pili nuts, salt.

**Contains:** milk, pistachio.

# Location of summary statements ?

- format, location & terminology requirements are in the Code
- preferred format for industry consistency

## FIGAML

- provides preferred & alternative formats
- discusses format, location & terminology requirements
- shows examples

# Capitals, punctuation & allergen order?

- not a Code requirement in summary statement
- FIGAML seeks industry consistency
- preferred format provided
- capital letters can be harder to read
- prefer same order as in statement of ingredients
- legibility is key!

## 4.1.6 SUMMARY STATEMENTS

A summary statement is essentially a summary of the allergens displayed in a statement of ingredients. Its purpose is to improve the consumer's ability to identify allergen information. **Consumers can use the summary statement for an initial allergen search and then seek more detailed information from the statement of ingredients.** Ensure the allergen summary statement makes sense, is logically consistent, and is not contradictory to the statement of ingredients (i.e., there should be no missing allergens or extra allergens).

### Format

**Summary statements are to begin with the bolded word 'Contains' and list the appropriate required names in a bold font which provides a distinct contrast with any other text in the statement of ingredients that are not required names.** The text typeface and size should be the same as the allergen declarations in the statement of ingredients [refer to Code subsections 1.2.3—7 (3) and (5)].

In this Guide, the preferred summary statement format is:

**Contains: allergen a, allergen b, allergen c.**

Alternative summary statement formats and punctuation can also be used if the overall presentation of the summary statement meets the requirements of the Code, noting that **CAPITAL LETTERS** can be more difficult to read.

Examples include:

Contains allergen a, allergen b, allergen c.  
Contains: allergen a, allergen b, allergen c.  
CONTAINS: ALLERGEN A, ALLERGEN B, ALLERGEN C.  
CONTAINS ALLERGEN A, ALLERGEN B, ALLERGEN C.

The order of the required names in a summary statement is not regulated by Code. **To achieve consistency within the food industry, it is recommended that the order of the required names aligns with the order displayed in the statement of ingredients.**

This generally represents order of magnitude, often aligns with labelling software outputs, and makes cross-referencing with the allergens in the statement of ingredients easier. To assist consumers with finding information quickly, it is preferred that wheat and gluten are located together, and individual tree nuts are located together if possible.

### Location

Summary statements must appear in the same field of view as the statement of ingredients, be located directly next to the statement of ingredients and be distinctly separated from it [refer to Code subsection 1.2.3—7 (4)]. For consistency it is encouraged that wherever possible the summary statement is located below the statement of ingredients and separated by a line space. An example of this format is shown in Figure 3. [Examples of summary statement locations](#). This figure shows the preferred formatting for an ingredient list. It also provides some alternative formats which may be useful, particularly for packages which have limited space, or where it is difficult to obtain a distinct separation between the summary statement and the statement of ingredients.

Where there are space limitations on the label, the summary statement can be distinctly separated by other means. Alternative methods to separate (differentiate) the summary statement from the statement of ingredients could be by using boxing or another noticeable shape or using a different text colour.

**When deciding whether a summary statement is distinctly separate, view the statement of ingredients and the summary statement together and consider whether a consumer can easily find the summary statement.** If the summary statement is not obvious or identified quickly, it may not be regarded as separated distinctly, and an alternative format should be considered.

#### 4.1.10 PROCESSING AIDS

If a processing aid is, or contains, an allergen, the Code [refer to section 1.2.3—6] sets out requirements for how it is declared (for example the processing aid is listed in the statement of ingredients with the words 'processing aid' displayed in conjunction with the required name). The location of processing aids within the statement of ingredients is not specified by the Code so can be positioned either:

- in descending order of ingoing weight; or
- at the end of a compound ingredient containing the processing aid; or
- at the end of the statement of ingredients

The following example shows how processing aids can be presented in an ingredient list.

Pork & Rice Curry is a refrigerated packaged meal comprising a pork ingredient that contains the milk based processing aid lactoperoxidase. The lactoperoxidase does not have a technological function in the food for sale and ordinarily would not require a declaration. However, because it is derived from an allergen (milk), it meets the requirements for a declaration of allergens.

**Table 8 Displaying allergens from processing aids in a statement of ingredients and allergen declarations**

Scenario	Example	Rationale
The words 'processing aid' are displayed in the statement of ingredients in conjunction with the required name. The required name is also displayed in the summary statement.	<b>Ingredients</b> Pork, ... other ingredients, ... curry spices, processing aid (milk).	The processing aid declaration is located at the statement of ingredients. This may be appropriate if a small quantity of the processing aid (last in descending order of weight), or its quantity is variable, or the processing aid is added in the manufacturing process rather than being derived from an ingredient. This is the preferred format for consistency.
	<b>Contains: milk.</b>	
Extra words such as 'contains' are not necessary in the statement of ingredients, and for the purposes of consistency, are not recommended. However, there may be situations where, including the word 'contains' or 'containing' can provide consumers with some context about the processing aid.	<b>Ingredients</b> Pork (processing aid milk), ... other ingredients.	Alternatively, the processing aid declaration is located in the ingredient which contains it. This may also be appropriate for compound ingredients.
	<b>Contains: milk.</b>	
	<b>Ingredients</b> Pork, ... other ingredients, ... curry spices, processing aid containing milk.	The word 'contains' preceding the processing aid provides further context about the source of the processing aid.
	<b>Contains: milk.</b>	
	<b>Ingredients</b> Pork, ... other ingredients, ... curry spices, processing aid (containing milk).	Alternatively, a processing aid may be comprised of several ingredients so use of the word 'contains' or 'containing' can indicate that the processing aid is not solely consisting of a single ingredient that contains milk.
	<b>Contains: milk.</b>	
	<b>Ingredients</b> Pork, ... other ingredients, ... curry spices, processing aid (containing milk).	The use of brackets is also acceptable.
	<b>Contains: milk.</b>	

Continued...

## What about processing aids?

- format, location & terminology requirements are in the Code
- preferred format for industry consistency

### FIGAML

- provides preferred & alternative formats
- shows examples

## International allergens (celery and mustard)

Although in Europe (EU) celery and mustard are allergens of public health significance, they are not in Australia and New Zealand and they are not listed in the table to section S9-3. As mustard and celery are not required names, and as additional words are not permitted in a summary statement, they cannot be included within it. When listed in the statement of ingredients they cannot be displayed in a manner that prevents any bolded required names from contrasting distinctly from the other text.

Example where mustard is present in a food.

### Ingredients

Mustard seeds, sugar, vinegar, **egg** yolk.

### Contains: egg.

When exporting foods to the EU, or importing foods into Australia and New Zealand, ensure that the labels comply with the relevant regulations for that jurisdiction. For example, voluntary 'contains' statements are not permitted on the labels of foods sold in the EU<sup>16</sup>.

## Location of required names

In a statement of ingredients, the required name must be listed separately for each ingredient.

If more than one ingredient contains the same allergen, the required name for that allergen is displayed separately from, but next to, the name of those ingredients.

Figure 2. [The allergen labelling elements of an ingredient list](#) shows each allergen declared as a bolded required name, noting that there are two ingredients that contain or are a product of wheat and the wheat is bolded each time.

Ingredients should be listed by their common name or a name that describes the ingredient (refer to Code section S9-3). Ingredients can also be listed to provide further context. For example, the following example, the name of the ingredient and further information about the nature of the ingredient.

The required name must be listed next to, the name of the ingredient, the percentage of the ingredient.

Example: water.

### Ingredients

Tuna (100%)

When listing a character of a character, the information required by the Standard.

Example: character.

### Ingredients

Tuna (100%)

If the required name of character, the percentage of the allergen ratio.

Example of a milk allergen is

### Ingredients

Cornflour, unsalted butter (100%)

In this example it is clear that the proportion is 15%.

### Ingredients

Cornflour, unsalted butter (100%)

# What about celery & mustard?

Allergen labelling requirements differ across countries & regions.

## FIGAML

- discusses international food regulations
- now has a new section addressing celery & mustard
- provides examples

# Can I still use 'dairy'?

## Change Approval Process

Changes to product formulations, ingredients and processing conditions need to be risk assessed, documented, and approved prior to any change being implemented. If there is a change to the allergen status of the product, the labelling must be updated prior to product reaching the market.

## 4.3 ALLERGEN FREE CLAIMS

Allergen free claims are claims that food companies use that emphasise the absence of an allergen in a food product. Allergen free claims are intended for consumers with food allergy. An example of an allergen free claim is 'Egg Free'.

### Free From

Consumers with food allergy may seek out products that make claims that they are 'free' from an allergen. Products with a free from claim must not have any ingredients or derivatives of that allergen formulated directly into the product. Also, the product must not have any cross contact for that allergen at any level, and therefore does not require a PM, statement identifying that allergen as a cross contact risk.

There are no requirements set out in the Code for making allergen free claims, so the criteria for making the claim falls to each company and consumer laws. When making an allergen free claim, the manufacturer is targeting a high-risk population, and therefore more stringent risk management controls than those described in this Guide are required. Allergen free claims should be supported by documented evidence of the controls and measures in place, and where possible, relevant and appropriate analysis should be applied to support these claims. To provide a safe product in this context it is critical to apply all established parameters of allergen management with the utmost stringency and to understand the consumer's perception of 'free'.

Further information is available on the Allergen Bureau website.

### Consumer Law and Free Claims

The Australian Competition and Consumer Commission (ACCC) and the New Zealand Commerce Commission

## Food Industry Guide to Allergen Management and Labelling

view 'free' to literally mean 'zero' or 'no traces' and is particularly likely to do so in relation to allergen free claims given the reliance that affected consumers might

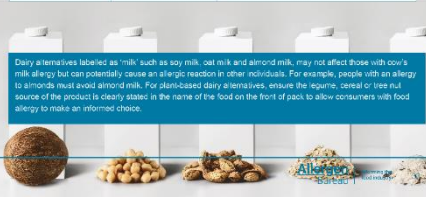
## Food Industry Guide to Allergen Management and Labelling

### 4.1.7 USE OF EXTRA WORDS LIKE 'CONTAINS' OR 'FROM' IN THE STATEMENT OF INGREDIENTS

Extra words such as 'from' or 'contains' preceding the required name in a statement of ingredients are not necessary, and for the purposes of achieving consistency, are not recommended. However, there may be situations when adding extra words to clarify the allergen source may be appropriate for reducing consumer confusion. Additional words in a summary statement are not permitted.

Table 7 Example showing where using an extra word before a required name may be appropriate.

Scenario	Example (often displayed in an ingredients list)	Rationale
Coconut milk	<b>Ingredients:</b> Coconut milk	Coconut milk is a plant-based dairy alternative, and in this scenario, the term 'milk' does not represent cow's milk, or more specifically a product of the 'mammary secretion of milk-producing animals' (Code section 1.1.2–5). Therefore, in this example, 'milk' is not a required name.  The absence of 'dodging and milk' in a summary statement distinguishes the food from mammalian milk.
The coconut milk contains added sodium caseinate (a milk derivative)	<b>Ingredients:</b> Coconut milk, sodium caseinate (milk)	The required name is displayed in the statement of ingredients and in the summary statement. The sodium caseinate is clearly the source of the milk allergen.
A food contains less than 5% of the compound ingredient coconut milk, sodium caseinate	<b>Ingredients:</b> Other ingredients ... coconut milk (contains milk)  <b>Contains:</b> milk.	Where a food contains less than 5% coconut milk, the sodium caseinate is not declared, however the milk allergen from the caseinate is.  In this example, a statement 'coconut milk (milk)' may be confusing to a consumer who may not realise that the milk allergen is added by means of a different ingredient. Including the word 'contains' such as 'coconut milk (contains milk)' provides context and therefore more clarity.



## Chapter 4: Allergen Labelling & Communication

### Lupin

Lupin is a legume which is increasingly used in foods in Australia. Limited information is available about lupin food allergy, however, some lupin proteins are similar to peanut proteins.

Example where lupin is present in a food.

**Ingredients:**  
lupin flour  
**Contains:** lupin.

### Milk

Milk is the mammary secretion of all milking animals (section 1.1.2–3 of the Code). Most people who are allergic to cow's milk will be allergic to other animal milks (goat, sheep or horse/mare) and products that are made from these milks<sup>11</sup>. By using the listed required name 'milk' in the summary statement, consumers with milk allergy should be able to distinguish mammalian milk from other plant-based dairy alternatives. The term 'lupin' cannot be used to meet the allergen declaration requirement for milk. It could be included in an ingredient name if 'milk' is also included (and 'milk' is listed as per format requirements for allergens).

Example where milk is present in a food.

**Ingredients:**  
milk solids  
**Contains:** milk.

Example where milk is present in a food from an identified animal source.

**Ingredients:**  
Goat milk  
**Contains:** milk.

FIGAML provides guidance on

- the term 'dairy'
- dairy alternatives
- other milks (such as goat)
- free claims

# Other words like 'and' or 'organic'?

## Summary statement

No other words (including 'tree nuts' or 'derivatives')

## Statement of ingredients

Other information is ok if meeting the other Code requirements, such as:

- required names
- location, formatting & terminology
- naming the ingredient (e.g., common, true nature)

### 4.1.8 SINGLE INGREDIENT FOODS

For a single ingredient food where the name of the food is the allergen (e.g., a carton of eggs), if the required name is displayed on the label (e.g., 'Eggs'), it does not require a statement of ingredients or a summary statement [refer to Code subsection 1.2.4—2(2) and Code subsection 1.2.3—6(3)] and the name of the food is the allergen declaration.

For a package of pure wheat flour, the declaration of both 'wheat' and 'gluten' is required [Column 4 of the table to section S9-3], however, the package does not require a statement of ingredients or a summary statement. It is recommended that the allergen declaration for wheat and gluten is displayed together on the label.

An ingredient list may be included voluntarily and is recommended in situations that would provide clarity for a consumer. An example is a package comprising of only powdered milk. Its label states 'milk powder' and a statement of ingredients and a summary statement are not required. A package of instant milk powder that contains the emulsifier soy lecithin is also offered for sale and is located next to the plain milk powder in the supermarket. This label is required to display both a statement of ingredients and a summary statement. To provide consistent information, it would be helpful to include an ingredient list onto the package of plain milk powder in the same location that the ingredient list will be positioned on the package of instant milk powder, so that a consumer can easily compare the two packages.

### 4.1.9 USE OF OTHER INFORMATION

The location of a characterising component declaration is not regulated by the Code and can be displayed anywhere on the label. If it is displayed within the statement of ingredients, the information should not compromise the location of the summary statement and its compliance with the Code's requirements (such as distinct contrast).

Example: Confectionery label displaying a characterising component declaration which is not located within the statement of ingredients.

#### Ingredients

Nougat [sugar, glucose syrup, vegetable oil, **egg white**, condensed **milk**], **milk chocolate** [sugar, **milk solids**, cocoa butter, cocoa mass, emulsifiers (322 (soy), 476)].

**Contains: egg, milk, soy.**

Milk chocolate contains 30% cocoa solids and 20% milk solids.

The Code's requirement for allergen declarations to be in distinct contrast with the other text also applies to information such as 'vegetarian' or 'organic', or advisory statements such as 'contains caffeine' if this information is located within the statement of ingredients. Other information located outside of the statement of ingredients and the summary statement can be bolded.

In this example, additional information 'organic' is included within the statement of ingredients and is not in bold. The other information about phenylalanine and seeds (from the fruit) is located outside of the statement of ingredients. The use of a heading 'caution' is voluntary.

Example: Canned fruit in sweetened syrup displaying an advisory statement and other information.

#### Ingredients

Organic lychees, organic rambutans, water, organic **wheat flour**, sweetener (962).

**Contains: wheat, gluten.**

CAUTION: This food contains phenylalanine and may contain seeds or seed fragments.

# 'May contain' statements?

Precautionary allergen labelling (PAL) is a voluntary statement displaying allergens that may be present due to cross contact.

FIGAML

- encourages a science-based risk assessment for PAL statements
- provides information about the preferred format, location & terminology

**Allergen**  
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Chapter 4: Allergen Labelling & Communication

Continued... Table 9. Displaying allergens from processing aids in a statement of ingredients and allergen declarations

Scenario	Example	Rationale
The FBO's Name Curry must use oilseed in a format where it is not required to bear a label or display a statement of ingredients.	Contains: rice	
Flavourings aids can be grouped together.	Ingredients: ...processing aids (sug, milk, egg) Contains: sug, milk, egg.	

**4.1.1 PRECAUTIONARY ALLERGEN LABELLING**

Precautionary allergen labelling (PAL) is a voluntary statement displaying allergens that may be present due to cross contact. A PAL statement is not considered to be a mandatory allergen declaration as described in Standard 1.2.3 of the Code.

Cross contact allergens occur when a residue or other trace amount of an allergen is unintentionally incorporated into another food.

Clear and consistent PAL statements, when applied using a science-based risk assessment, are as important as a correctly displayed statement of ingredients and summary statement because the three elements together enable consumers with food allergy and their carers to identify foods that are safe to eat, and those that they should avoid.

An example of PAL is shown in Figure 2. The allergen labelling elements of an ingredient list of this Guide.

The declaration of a cross contact allergen in a PAL statement does not diminish the requirement to apply HACCP and GMP to ensure that the cross contact allergen is present at the lowest practicable level and is controlled at this level.

**Food Industry Guide to Allergen Management and Labelling**

**Presentation of a PAL Statement**

To achieve consistency within the food industry the general recommendations for declaring allergens in a PAL statement are as follows:

**FORMAT**

- When a VITAL risk assessment has been applied (refer to this Guide, section 4.1.12 The Voluntary Incident/Traffic Allergen Labelling (VITAL) Program), the PAL statement should be printed in the following format:
- May be present: allergen x, allergen y.
- Use the same typeface and text size as any required name in the statement of ingredients.
- Print in a bold font that provides a distinct contrast with any other text except for the summary statement and the required names in the statement of ingredients.

**TERMINOLOGY**

- Declare cross contact allergens, when assessed as being present at Action Level 2 in the VITAL Program, using the required names set out in Column 3 of the table to section 50-3 (except in the case of cereals).
- For cereals, use the required name set out in Column 3 and where the cereal contains gluten, also declare 'gluten'.
- If 'gluten' is already declared in the summary statement, it is not necessary to repeat it in the PAL statement.
- If more than one cereal is present at Action Level 2, each should be declared separately in the PAL statement, e.g., **May be present: barley, oats, rye, gluten.**
- If more than one tree nut is present at Action Level 2, each should be declared separately in the PAL statement, e.g., **May be present: almond, hazelnut.**
- The terms 'other cereals' or 'other tree nuts' are only acceptable when there are other allergens from the group which are listed in the summary statement and the terms are used to provide clarification. For example: **May be present: other cereals (barley, gluten).** Or **May be present: other tree nuts (cashew, pine nut, Brazil nut).**
- Cross contact allergens should be listed individually. Avoid, wherever practicable, the use of terms which describe a group of allergens – these include 'cereals containing gluten', 'cereals' and 'tree nuts'.
- There may be situations where, after a thorough risk review has been completed and opportunities to reduce or eliminate cross contact allergens have been exhausted, FBOs may need to apply a PAL statement that declares all (or virtually all) tree nuts or all (or virtually all) cereals containing gluten. In this situation alternative descriptions such as the use of terms which describe a group of allergens may be appropriate to communicate this risk to the allergic consumer.
- Singular terms for allergens are recommended in the PAL statement – however plural terms are also acceptable.

**LOCATION**

- Display the PAL statement separately from but next to the summary statement.
- The preferred location is below the allergen summary statement on a separate line as shown in Figure 2. The allergen labelling elements of an ingredient list of this Guide.
- The PAL statement cannot be located such that it prevents the summary statement from being directly next to the statement of ingredients (for example it cannot be between the statement of ingredients and the summary statement).
- If a summary statement is not used because there are no allergens in the statement of ingredients, display where the summary statement would usually be located.

**ALLERGEN LABELLING (VITAL) PROGRAM**

 **VITAL**

The use of 'May be present: allergen x, allergen y' for an allergen in a PAL statement does not preclude the ongoing requirement to manage and control the allergen at the lowest practicable level.

FBOs implementing VITAL must understand the VITAL Program. Details about the VITAL risk assessment process and a range of tools which support the VITAL Program are available on the [Allergen Bureau website](#), including the:

- Food Industry Guide to the Voluntary Incident/Traffic Allergen Labelling (VITAL) Program
- VITAL Online (web-based VITAL Calculator)
- VITAL Best Practices Labelling Guide for Australia and New Zealand
- Allergen Risk Review website.

**Allergen Bureau**

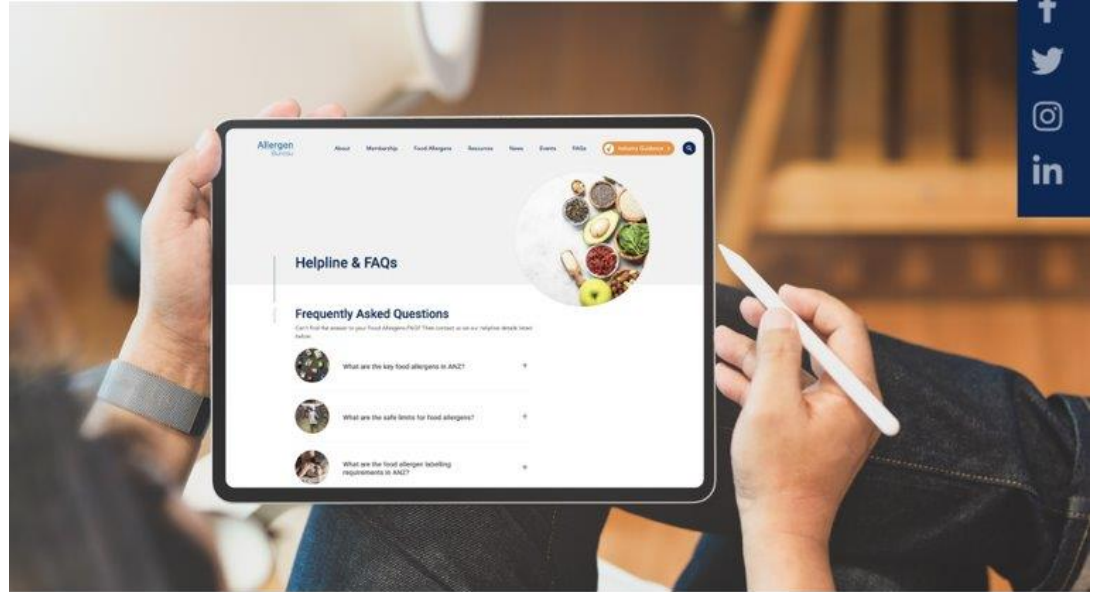
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*Have a Question?*

## FAQ & Free Helpline



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# Allergen Bureau

## Contact Us

Free Allergen Bureau Helpline

[info@allergenbureau.net](mailto:info@allergenbureau.net)

Phone: +61 437 918 959 (International)

[www.allergenbureau.net](http://www.allergenbureau.net)