

Allergen Bureau

Putting The Rules Into Tools – Industry Best Practice Guidance On PEAL

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VITAL Co-Ordinator
July 2021



Informing the
food industry

Food allergen management guidance *for industry, by industry*

The Allergen Bureau is the peak industry body representing best practice food industry allergen management globally.

Become a member today.

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Allergen Bureau

- 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
- BBF Hull Limited
- 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.

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The 'Rules'



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What is PEAL?

- PEAL is the Plain English Allergen Labelling variation to the Australia New Zealand Food Standards Code (the Code)
- sets out how to declare allergens to ensure that they are clear and consistent
- applies to all foods
- refer to the Code to ensure requirements are met

Standard 1.1.1 **Structure of the Code and general provisions**

Standard 1.2.3 **Information requirements – warning statements, advisory statements and declarations**

Standard 1.2.4 **Information requirements – statement of ingredients**

Schedule 9 **Mandatory advisory statements**

Schedule 10 **Generic names of ingredients and conditions for their use**

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

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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Key Changes due to PEAL

- Required names: mandatory specified names for allergens
- Molluscs & individual (specified) tree nuts to be declared
- Focus on wheat and gluten as substances of concern
- 'Contains' summary statement is required
- Format and location requirements for the allergen declaration



Cheesy Seafood Pasta

Ingredients

Spaghetti (30%) (durum **wheat** pasta, water), seafood (20%) [prawns (**crustacean**), clams (**mollusc**)], diced tomato, water, onion, toasted **pine nuts**, parmesan cheese (5%) (**milk**), salt.

Contains: wheat, gluten, crustacean, mollusc, pine nut, milk.

Note the following PEAL requirements:

Allergens are declared in the statement of ingredients using required names using **bold** font.

'Contains' summary of ingredients – meets location, terminology & format requirements.



Excerpt from the table to S9-3 of the Code

Mandatory declarations

<i>Item</i>	<i>Column 1</i>	<i>Column 2</i>	<i>Column 3</i>	<i>Column 4</i>
	<i>Food</i>	<i>Exemption</i>	<i>Required name for declarations in a statement of ingredients</i>	<i>Required name for other declarations</i>
3	wheat (including its hybridised strain) irrespective of whether it contains gluten	<p>(a) the wheat or its hybridised strain that is present in beer or spirits;</p> <p>(b) glucose syrups made from wheat starch and that:</p> <p>(i) have been subject to a refining process that has removed gluten protein content to the lowest level that is reasonably achievable; and</p> <p>(ii) have a gluten protein content that does not exceed 20 mg/kg;</p> <p>(c) alcohol distilled from wheat.</p>	wheat	<p>(a) wheat; and</p> <p>(b) if gluten is present - gluten.</p>

'The Tools'



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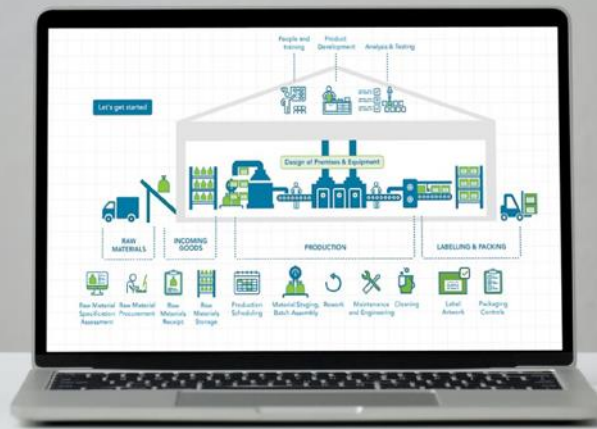
Industry Guidance

- Food Industry Guide to Allergen Management and Labelling for Australia and New Zealand – PEAL updated edition
- Food Industry Guide to the Voluntary Incidental Trace Allergen Labelling (VITAL®) Program
- Allergen Risk Review Website



Assessing allergen risk at every stage of the process to make food.

Find out more



Industry Guidance

- encourages consistency in approach by industry
- confirms your understanding the Code
- assists in navigating the Code
- promotes discussion
- can approach subjects which are challenging to legislate – for example, precautionary allergen labelling (PAL)
- flexible to the needs of stakeholders





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Figure 3. Examples of summary statements

Preferred format - the summary statement

Ingredients:
Water, vegetable oil, vinegar,
yeast, tomato paste,
sodium citrate, egg yolk,
thickener (E412), almonds,
parmesan cheese (milk),
garlic, wheat flour, leavening
(wheat malto-dextrin, yeast
cell, antioxidant (E202)).

Alternative formats - the summary statement

Ingredients:
Water, vegetable oil, vinegar,
yeast, tomato paste,
sodium citrate, egg yolk,
thickener (E412), almonds,
parmesan cheese (milk),
garlic, wheat flour, leavening
(wheat malto-dextrin, yeast
cell, antioxidant (E202)).

Alternative format for labels with very small text

INGREDIENTS: Water, vegetable
oil, vinegar, yeast, egg yolk,
parmesan cheese (milk), garlic,
wheat flour, leavening
(wheat malto-dextrin, yeast
cell, antioxidant (E202)).

Terminology

The required names for summary statements for soybean and cereals containing gluten are the same as those in the statement of ingredients (see Column 4 of the table 1). The following example shows how the information can be presented in a statement of ingredients using the required terminology.

Example: Ingredient list for Frozen Mince

Ingredients:
Green beans, sugar snap peas, onion
(soybean).

Contains: soy.

Note that soy, soya and soybean are not required in the statement of ingredients, but a statement where soy is the only allergen present.

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

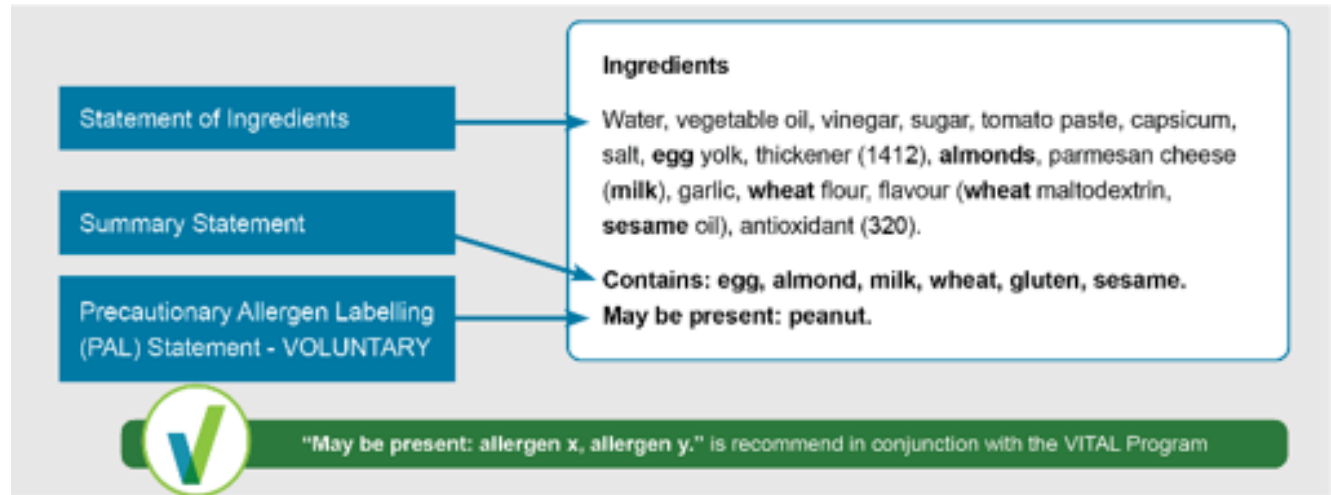


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Format

- FIGAML has a recommended allergen labelling format
- Incorporates mandatory requirements
- Additional guidance for consistency for how to set out an allergen declaration



Location of summary statements

FIGAML provides examples of preferred & alternative formats

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.

Required names

The collage shows three overlapping pages from the FIGAML (Food Information Guide to Allergen Management) document. The top page is for 'Wheat and cereals containing gluten', the middle for 'Soybean', and the bottom for 'Tree nuts'. Each page contains text explaining allergen requirements and lists of ingredients with checkboxes for 'Contains' and 'Does not contain'. Below the pages are images of wheat flour, soybean oil, and a chocolate ice cream bar.

Ingredients

triticale (wheat, rye)

Contains: wheat, gluten.

Ingredients

spelt (wheat)

Contains: wheat, gluten.

Ingredients

wheat gluten

Contains: wheat, gluten.

FIGAML

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

Summary Statements & other information

- capital letters can be harder to read
- list allergens in the same order in the summary statement as in statement of ingredients
- legibility is key!

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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.

CONTAINS ALLERGEN A, ALLERGEN B, ALLERGEN C.

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.

- What is Precautionary Allergen Labelling (PAL)?
- What is the impact for PEAL on PAL?
- *New* VITAL website and VITAL Online

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Precautionary Allergen Labelling (PAL)

- To declare the possible presence of cross contact (a residue or other trace amount of a food allergen that is unintentionally incorporated into another food)
- Voluntary
- Important to help consumers know what food is safe for them to eat
- Most helpful when applied consistently across industry
- **May be present: allergen x, allergen y.**

May contain ...	May contain traces of ...	Packed in an environment where ... may be present	Made in a facility that also processes ...
Produced in a factory which handles ...	Produced on shared equipment that also processes ...	Made on the same production line as...	Made in a production area that also uses...
No nuts in ingredients, but cannot guarantee to be nut-free	Not suitable for ... allergy sufferers	Due to methods used in the manufacture of this product, it may occasionally contain ...	May be present: ...

The VITAL[®] Program

- A standardised allergen risk assessment process for food industry.
- Provides a consistent methodology for food industry to **assess the impact of allergen cross contact** and provide appropriate precautionary allergen labelling on their products.



Developed **by** industry **for** industry and is adopted on a voluntary basis

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VOLUNTARY

INCIDENTAL

TRACE

ALLERGEN

LABELLING

Thresholds in the VITAL Program

Action Level 1

low concentration of the relevant allergen under evaluation, low chance of adverse reaction

no PAL statement is required

Action Level 2

significant concentration of the relevant allergen under evaluation, significant chance of adverse reaction

PAL statement is required

The Food Standards Code influences the VITAL Program allergen labelling guidance

- ✓ Font and format
- ✓ Terminology
- ✓ Individually name cereals containing gluten and tree nuts
- ✓ Focus on gluten as a key substance

Examples shown in this presentation are to provide best practice guidance



Recommended Labelling Format – PAL Statement

Ingredients

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.
May be present: peanut.

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FORMAT:

- **May be present: allergen x, allergen y.**
- Bold font
- Same typeface and text size as used for the required names in the Statement of Ingredients



Recommended Labelling Format – PAL Statement

Ingredients

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.

May be present: peanut.

LOCATION of PAL statement

- Separately from, but next to, the summary statement
- Not between the Summary Statement and the Statement of Ingredients
- Where there is no Summary Statement, then place below the Statement of Ingredients

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Recommended Labelling Format – PAL Statement

Ingredients

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.

May be present: peanut.

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TERMINOLOGY

Required names set out in Column 3 of the table to section S9-3 (FSC) + 'gluten' where present

Declare individual allergens wherever possible

Use singular terms



Example 1: Rice Crackers

Ingredients

Rice (95%), sunflower oil (antioxidant (319)), salt.

May be present: wheat, gluten.

NOTES:

Where there is no Summary Statement then the PAL statement is directly below the ingredient list.

There is wheat cross contact – both “wheat” and “gluten” are declared in the PAL statement.



Example 1: Rice Crackers

Ingredients

Rice (95%), sunflower oil (antioxidant (319)), salt.

May be present: rye, gluten.

NOTES

No summary statement: PAL statement is directly below the ingredient list.

Rye cross contact – also add 'gluten' where relevant.



Example 2: Barley stew

Ingredients:

Water, potato, carrots, celery, **barley**, **oats**.

Contains: gluten.

May be present: wheat.

NOTES

Gluten is in the Summary Statement.
Wheat cross contact – do not repeat
'gluten' in the PAL statement.



Example 3: Muesli bar

Ingredients:

Oats, glucose syrup, **almond** meal, honey, coconut.

Contains: **gluten, almond.**

May be present: **tree nuts (cashew, walnut).**

Ingredients:

Oats, glucose syrup, **almond** meal, honey, coconut.

Contains: **gluten, almond.**

May be present: **cashew, walnut.**

NOTES

Declare individual tree nuts wherever possible in the PAL statement.

Consider: is this clear for the consumer?



Example 4: Salad sprinkle

Ingredients:

Sesame seeds, pepitas, pine nuts, soy sauce.

Contains: sesame, pine nut, soy.

May be present: almond, Brazil nut, cashew, hazelnut, macadamia, pecan, pistachio, walnut.

NOTES

Risk assessment has identified 8 tree nuts

Is the PAL statement clear for the consumer?



Example 4: Salad sprinkle

Ingredients:

Sesame seeds, pepitas, pine nuts, soy sauce.

Contains: sesame, pine nut, soy.

May be present: tree nuts.

NOTES

Optional – using “tree nuts” may be appropriate to communicate the risk to the consumer.



PAL Statements

- Where the VITAL Program is not applied, consider using “May Contain”
- Examples in the presentation are for discussion – we continue to develop advice around PAL statements based on your questions and comments
- Updated VITAL Best Practice Labelling Guide will be released soon



VITAL Online – it can help



- VITAL Online rebuild improves performance, performance, manageability, and reliability
- You can now access the brand new VITAL Online website for the VITAL Online Calculator, as well as VITAL Science, VITAL Training, the VITAL Standard, and more, via the new VITAL Online portal.



vital.allergenbureau.net

VITAL Program Version 3.0

Resources
for the
Food Industry

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2. THE VITAL PROCEDURE

2.1 Scope

The VITAL Procedure is applicable to allergens which are:

- Intentionally added to a food product
- Found in a food product as a result of cross-contamination
- Found in a VITAL Allergen Label Class

It is not applicable to:

- Food products that are not for human consumption
- Food products that are not for sale in Australia
- Food products that are not for sale in New Zealand
- Food products that are not for sale in the United Kingdom
- Food products that are not for sale in the United States of America
- Food products that are not for sale in the European Union
- Food products that are not for sale in the Middle East
- Food products that are not for sale in the rest of the world

2.2 Pre-requisites

- A food product to apply the VITAL Procedure in the absence of a VITAL Allergen Label Class
- A food product that is not a VITAL Allergen Label Class
- A food product that is not a VITAL Allergen Label Class
- A food product that is not a VITAL Allergen Label Class

Allergen Identification

2.3 Determination of relevant allergens

Determine the allergens to be included in the VITAL label statement. All allergens used in the inventory or production of the food product should be considered. Allergen identification should be based on the following:

- The allergen identification process should be based on the allergen identification process in the VITAL Procedure
- The allergen identification process should be based on the allergen identification process in the VITAL Procedure
- The allergen identification process should be based on the allergen identification process in the VITAL Procedure

VITAL
PEAL updated
April 2021
Informing the food industry | allergenbureau.net

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Summary of the 2019 VITAL Scientific Expert Panel Recommendations

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VITAL Standard Version 1.0

VITAL
an initiative of the Allergen Bureau
October 2014

VOLUNTARY INCIDENTAL TRACE ALLERGEN LABELLING

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VITAL Online Version 3.1.4



VITAL User Group
vital@allergenbureau...

Dashboard

Ingredients

Processing Profiles

Recipes

Libraries

Reports

UPDATE ALL RECIPES

Legislations

Organisations

Users

Invoices

Contact Entries



Visible to you and 1 other

Draft



Use as an ingredient

Recipe Information Yield **Ingredients** Processing Profiles Revision History

ADD INGREDIENTS

Add the individual materials or ingredients, their allergens and their percentage of this recipe. Ingredients can be selected from your organisation's Ingredient Library or they can be entered as part of the recipe.

Q Add an Ingredient



CURRENT INGREDIENTS

ALLOCATED
100%

∨ Cooking fat	×	30%
∨ Sugar	×	30%
∨ Liquid whole egg	×	20%
∨ Batter	×	10%

INGREDIENTS

Review the allergen information (e.g. product specification) from the supplier for each ingredient, raw material and processing aid to determine the presence or absence of all relevant allergens as intentionally added allergens or cross contact allergens.

Intentionally Added Allergens are any ingredient (or intrinsic part of the ingredient) of the recipe/formulation which contains an allergen, and includes all allergens which require mandatory declaration in the country of sale.

Cross Contact Allergens are a residue or other trace amount of a food allergen that is unintentionally incorporated into another food. Cross contact allergens can be present in a "readily dispersible" or "particulate" form.

Readily Dispersible Cross Contact Allergens are a powder or liquid in homogenous form that is easily distributed throughout a food product eg. milk powder, soy flour. A readily dispersible cross contact allergen is considered homogeneously distributed in the final product.

Particulate Cross Contact allergens, for the purpose of the VITAL risk assessment, are a particulate which is a separate and distinct particle of material (eg. sesame seeds, slivered nuts, grated cheese) which either

- Doesn't mix homogeneously with other parts of the food; or,
- may consist of, or are likely to aggregate into, an entity which contains a level equal to or greater than the relevant Reference Dose.

VITAL Online – Australia/New Zealand

Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat

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PEAL

Cereals

- Barley
- Oats
- Rye

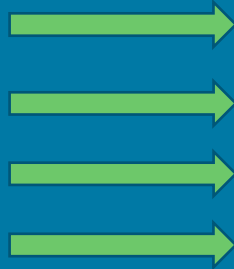
- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten

VITAL Online – Australia/New Zealand

Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat



PEAL

Cereals

- Barley
- Oats
- Rye
- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten

Gluten proteins may be removed due to processing or breeding techniques.

VITAL Online – Australia/New Zealand

Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat



PEAL

Cereals

- Barley
- Oats
- Rye

Deleted – now 'wheat & its hybrids'

- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten

VITAL Online – Australia/New Zealand

Pre-PEAL

Cereals containing gluten

- Barley
- Oats
- Rye
- Spelt
- Wheat

PEAL

Cereals

- Barley
- Oats
- Rye
- Wheat & its hybrids which contain gluten
- Wheat & its hybrids which do not contain gluten

NEW

Investigate allergen status of the food

Allergen risk review is extremely important!

- Do a thorough investigation of the sources of cross contact e.g.
 - ask and document questions to suppliers
 - complete a thorough, cross-functional assessment of allergens on-site
- Be able to defend allergen label: ask “have we done everything that is possible to manage this cross contact allergen”
- Allergen Bureau Allergen Risk Review website

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Allergen Risk Review Website

- a freely available interactive factory map designed to assist the food industry with understanding the allergen status of its products
- detailed information about assessing allergen risk at every stage of the process to make food

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info.allergenbureau.net/

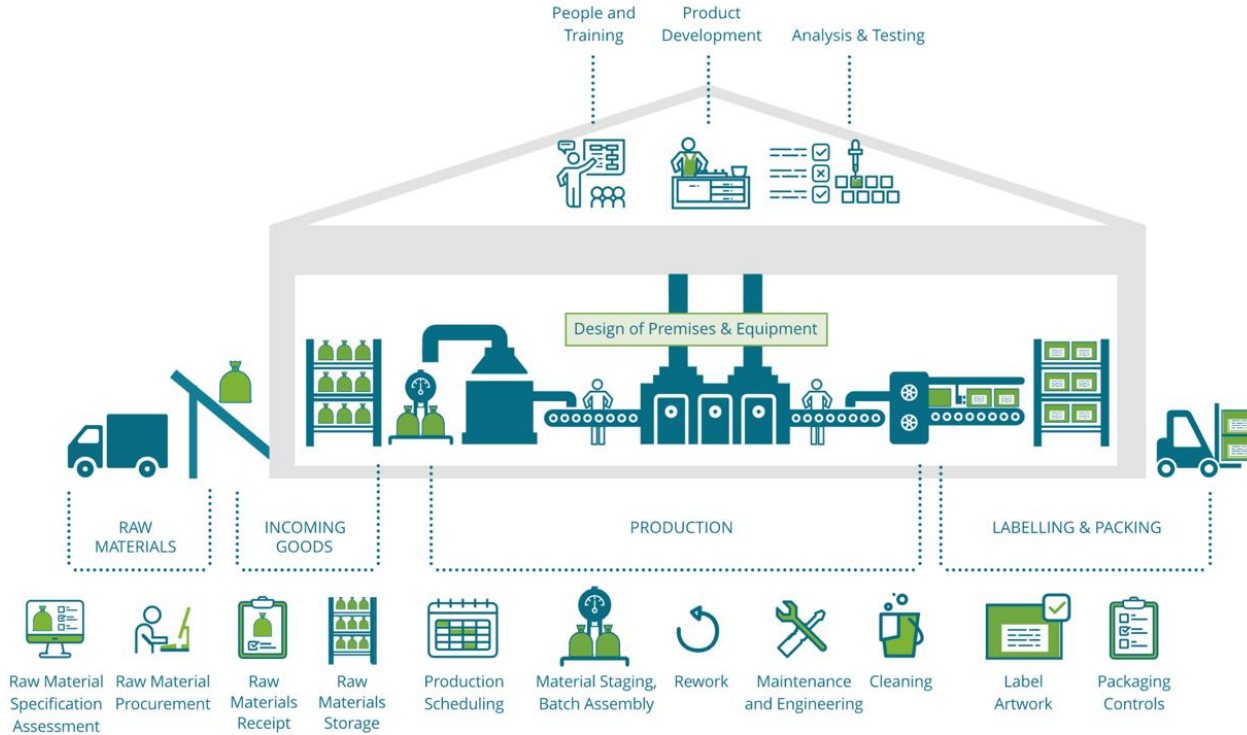
Allergen Risk
Review Website

Assessing allergen risk
at every stage of the
process to make food.

Find out more



ARRW Factory map





Labelling & Packing Step 11 of 15

Label artwork

When food labels declare the presence of allergens in an accurate, clear and consistent manner, people with food allergy can quickly and easily identify which foods they can eat.

Regulatory requirements



Declare food allergens



Review label artwork



Allergen Management Program (AMP)





Labelling & Packing Step 12 of 15

Packaging controls

Any labels or packaging should correctly communicate the allergen status of the food it is attached to.

Version control



Right label on right product



Allergen Bureau Resources

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A New Website Platform

Introducing our new & improved corporate website allergenbureau.net, & brand-new website platform for VITAL® Online.

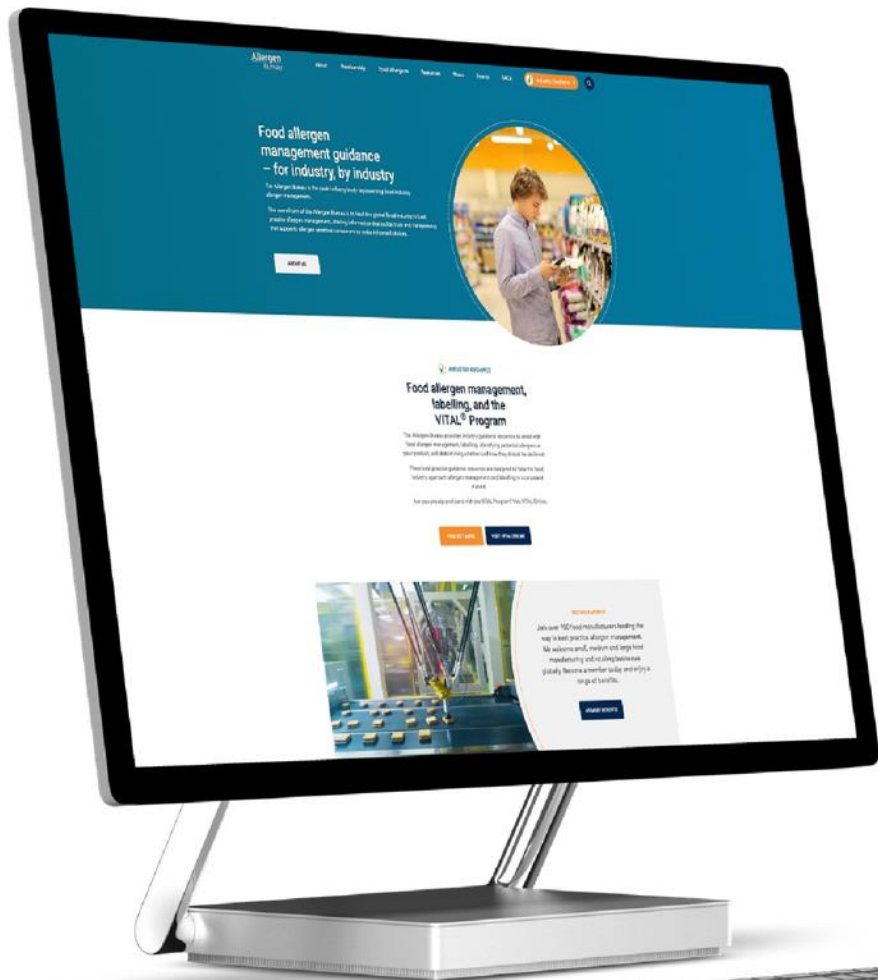
- interactive news & events pages
- easy search functions
- updated industry FAQs
- conference presentations
- free helpline service



Allergen Bureau

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

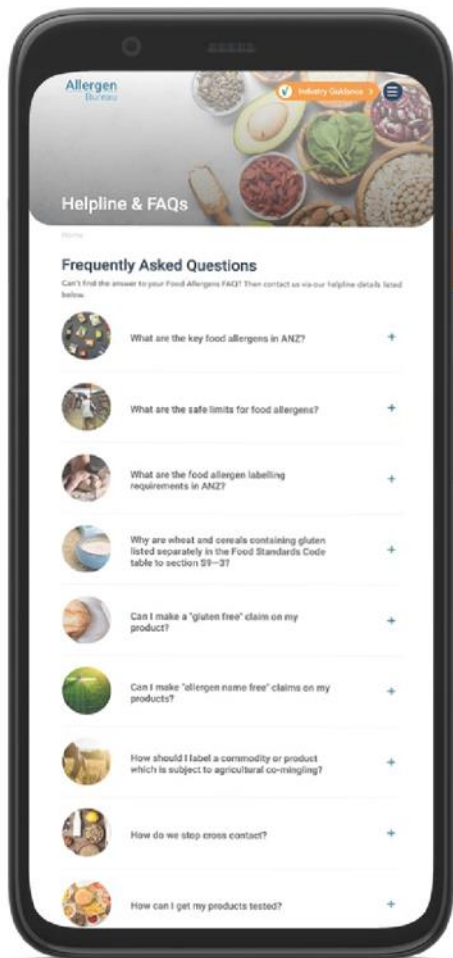




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