

# Allergen Bureau

Informing the  
food industry

## PEAL & PAL – INDUSTRY BEST PRACTICE

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# 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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## Our Vision

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

## Our 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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Figure 3. Examples of summary statements

Preferred format - the summary statement

Ingredients:  
wheat, gluten, soybean, peanut, sesame

Alternative formats - the summary statement

Ingredients:  
Water, vegetable oil, vinegar, sugar, cornstarch, salt, egg yolk, hydrolyzed wheat protein, polysorbate (E415), almond, potassium sorbate, citric acid, natural flavors, wheat flour, butylated hydroxytoluene, xanthan gum, emulsifier (E322).

Alternative format for labels with varying allergen levels

INGREDIENTS: Water, vegetable oil, vinegar, sugar, cornstarch, salt, egg yolk, potassium sorbate, citric acid, natural flavors, wheat flour, butylated hydroxytoluene, xanthan gum, emulsifier (E322).

**Terminology**

The required names for summary statements for soybean and cereals containing gluten are the same as those in the statement of ingredients. The following example shows how it can be presented in a statement of ingredients using the required terminology.

Example: Ingredient list for Frozen Mince

Ingredients:  
Chicken, lean, sugar snap peas, egg (soybean).

Contains: soy.

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



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

# Essential Allergen Guidance For The ANZ Food Business Operator

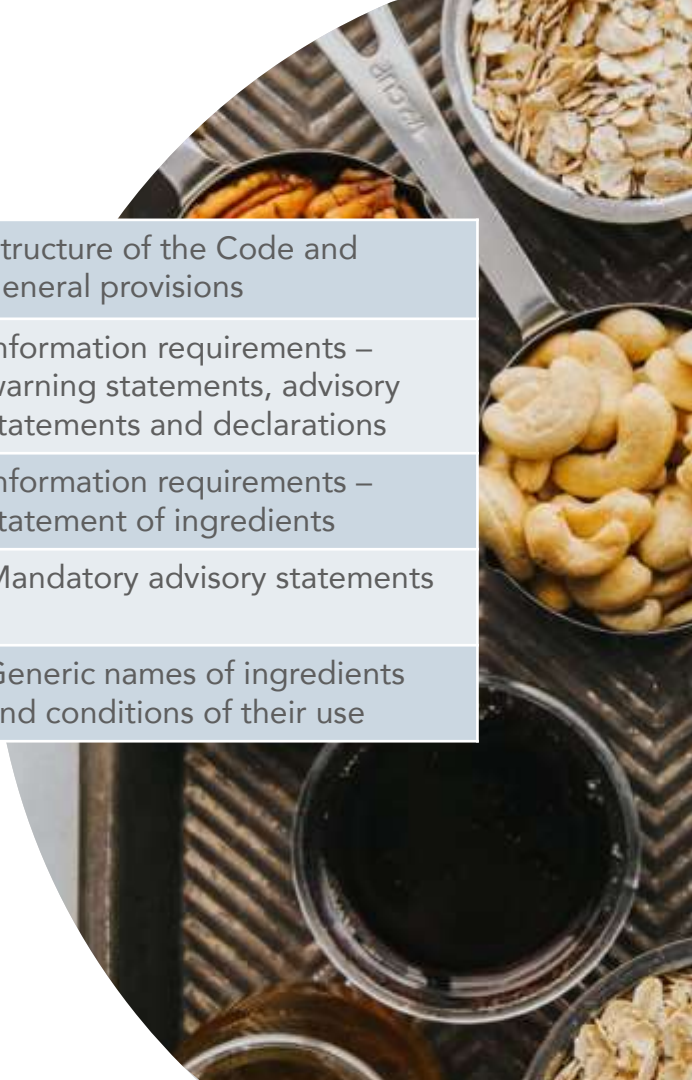


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# What is PEAL?

- 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 of their use

# How Much Time Do We Have?

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	157	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**  
Updates

- 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)

# 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



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Updates

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# Cheesy Seafood Pasta

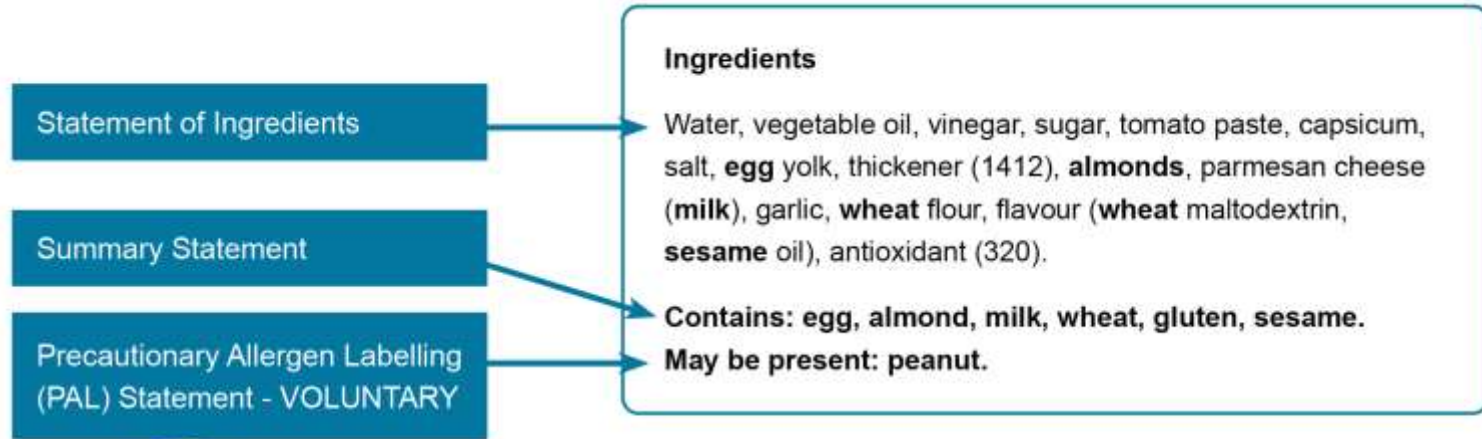
## Ingredients

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.



# Recommended Labelling Format – FIGAMI



"May be present: allergen x, allergen y." is recommend in conjunction with the VITAL Program

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- Incorporates mandatory requirements
- Additional guidance for consistency for how to set out an allergen declaration

# Required Names

## FIGAML

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

### Ingredients

triticale (wheat, rye)

**Contains: wheat, gluten.**

### Ingredients

wheat gluten

**Contains: wheat, gluten.**

### Ingredients

spelt (wheat)

**Contains: wheat, gluten.**

# Location of 'Contains' summary statement

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.**

# Summary Statements & Other Information

- Capital letters can be harder to read
- List allergens in the same order as in statement of ingredients
- Legibility is key!

**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.



# 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.

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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 Allergen Bureau's VITAL (Voluntary Incidental Trace Allergen Labelling) Program is a standardised allergen risk assessment process for food industry

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



Trial VITAL  
Online  
today



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

# 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.

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## LOCATION of PAL statement

- Separately from, but next to, the summary statement
- Below the Summary Statement
- Where there is no Summary Statement, then place below 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.

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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

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## 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.

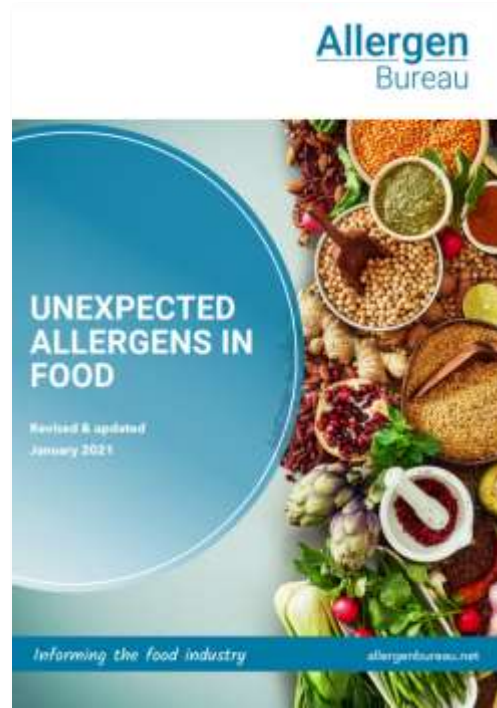
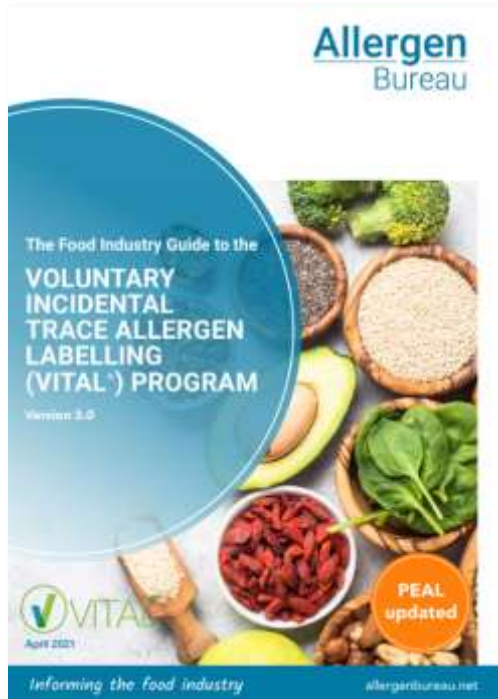


# PAL Statements

- where the VITAL Program is not applied, consider using “May Contain”
- examples in this 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



# Industry Guidance



Access them all via the Allergen Bureau website

# Review Labels for Compliance

- virtually all allergen declarations for foods will require review
- are specifications/Product Information Forms up to date?
- review the implementation of the VITAL Program
- review allergen management plan
- refer to industry guidance





# THANK YOU

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CONTACT US:



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