

Allergen Bureau

Informing the
food industry

**Allergen Labelling:
Are you ready for the
25 February 2024
PEAL cut-off?**

FACILITATED BY: Baking Association of Australia
PRESENTED BY: Lisa Clark & Nicole Koek



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 and manufactured foods
- Established in 2005, pre-competitive, 'not-for-profit', Allergen Bureau directors provide voluntary, unpaid services

Become a member

Global Member



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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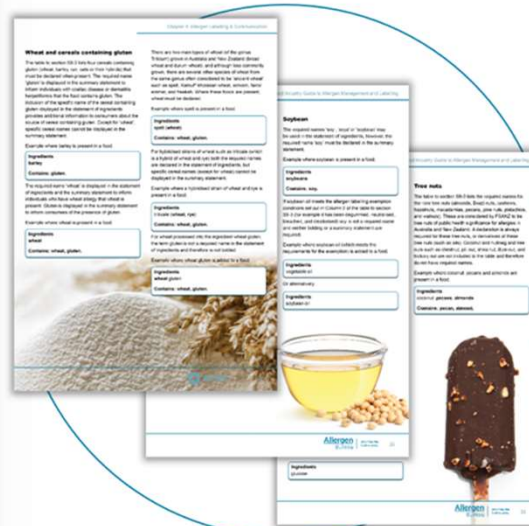


Our Resources



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Examples Provided...



See FIGAML for more examples of how to declare allergens in the statement of ingredients and summary statement.

Ingredients
wheat gluten
Contains: wheat, gluten.

Ingredients
spelt (wheat)
Contains: wheat, gluten.

Ingredients
triticale (wheat, rye)
Contains: wheat, gluten.

Allergen Risk Review Website

- Claims substantiation of any type needs robust risk review and focus.
- The Allergen Risk Review website (ARRW) is a freely available interactive factory map designed to assist the food industry with understanding the allergen status of its products.
- Here you can find detailed information about assessing allergen risk at every stage of the process to make food.



Easy
Step-by-step
Industry
Guidance

info.allergenbureau.net

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



Trial VITAL
Online
today



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

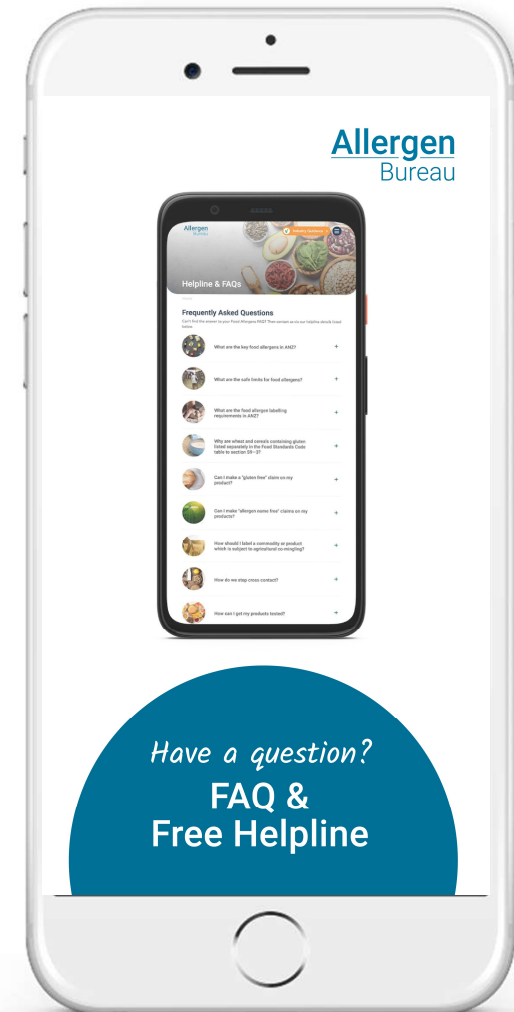
Free Helpline

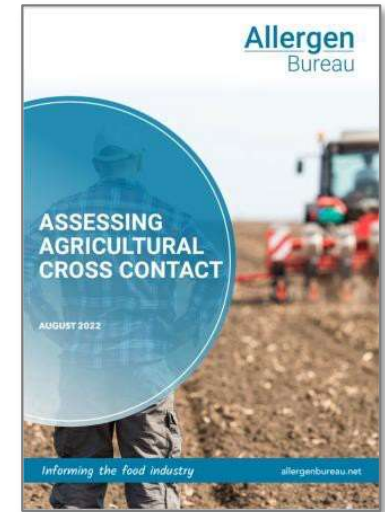
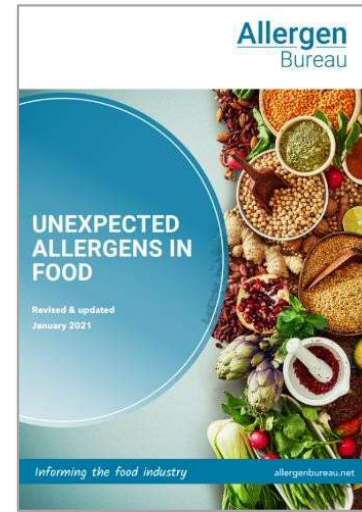
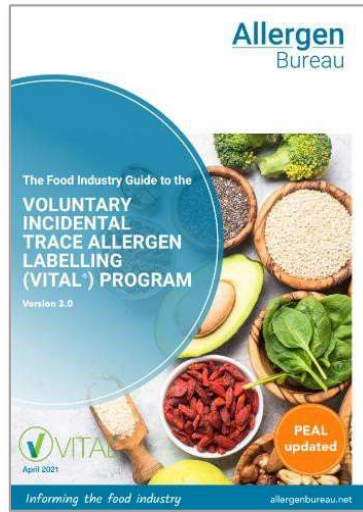
- Allergen labelling
- Allergen management
- The VITAL Program
- VITAL Online
- “Curly” questions!

Email: info@allergenbureau.net

Phone: +61 437 918 959 (International)

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<https://allergenbureau.net>

**PEAL – What do you
need to know.**



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Definitions


- **PEAL** = Plain English Allergen Labelling
 - For: Intentional Allergen Presence
- **PAL** = Precautionary Allergen Label
 - For Unintentional Allergen Presence
e.g. May be present or May contain.
- This change in legislation relates only to Intentional Allergen Presence.

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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)
- PEAL sets out how to declare allergens to ensure that they are clear and consistent
- PEAL 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	197	F2021L00145 24 Feb 2021 FSC138 25 Feb 2021	Clause 4	<p>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.</p> <p>The transition period is the period of time that commences on 25 February 2021 and ends on 25 February 2024.</p> <p>The post-transition period is the period of time that commences 26 February 2024 and ends on 26 February 2026.</p>
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PLAIN ENGLISH ALLERGEN LABELING (PEAL) COMPLIANCE SIMPLIFIED

25 February 2024

Food packaged and labelled on or before **25 February 2024** in accordance with the old requirements may be sold for up to 2 years.

26 February 2024

Food packaged and labelled from **26 February 2024** must comply with the new PEAL requirements.

25 February 2026

All food packaged and labelled must comply with the new PEAL requirements

Consistency is our most powerful tool in allergen labelling

- The Allergen Bureau promotes consistent allergen labelling
- PEAL clearly defines how allergens should be declared
- Check FIGAML for all other aspects of allergen labelling (e.g. precautionary allergen labelling)
- Regulations vs voluntary

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PEAL
Updates



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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Example PEAL compliant Label: 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.



Required Names -Groups

Cereals (Ingredient list)	Cereals (Summary Statement)
Barley	gluten (where relevant)
Oats	gluten (where relevant)
Rye	gluten (where relevant)
Wheat	Wheat, gluten (where relevant)

Tree nuts (Ingredient list)	Tree nuts (Summary Statement)
Cashew	Cashew
Pistachio	Pistachio
Walnut	Walnut
Pecan	Pecan
Almond	Almond
Brazil nut	Brazil nut
Hazelnut	Hazelnut
Macadamia	Macadamia
Pine nut	Pine nut

Determining if a Cereal Contains Gluten

- See page 24-25 of FIGAML
- Industry best practice:
 - Review supplier information (*PIF/specification*)
 - Understand the ingredient processing (e.g. *aerosols*)
 - Validation (*which may include specialised laboratory analysis, in addition to methods for quantitative allergen analysis*)
 - Monitoring

If you are unsure
if gluten is
present,
assume that it is!

Due Diligence Principles

Apply due diligence principles and take all practical precautions or measures to determine if gluten is present or not including reviewing supplier information, understanding the ingredient processing, testing, and monitoring

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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.

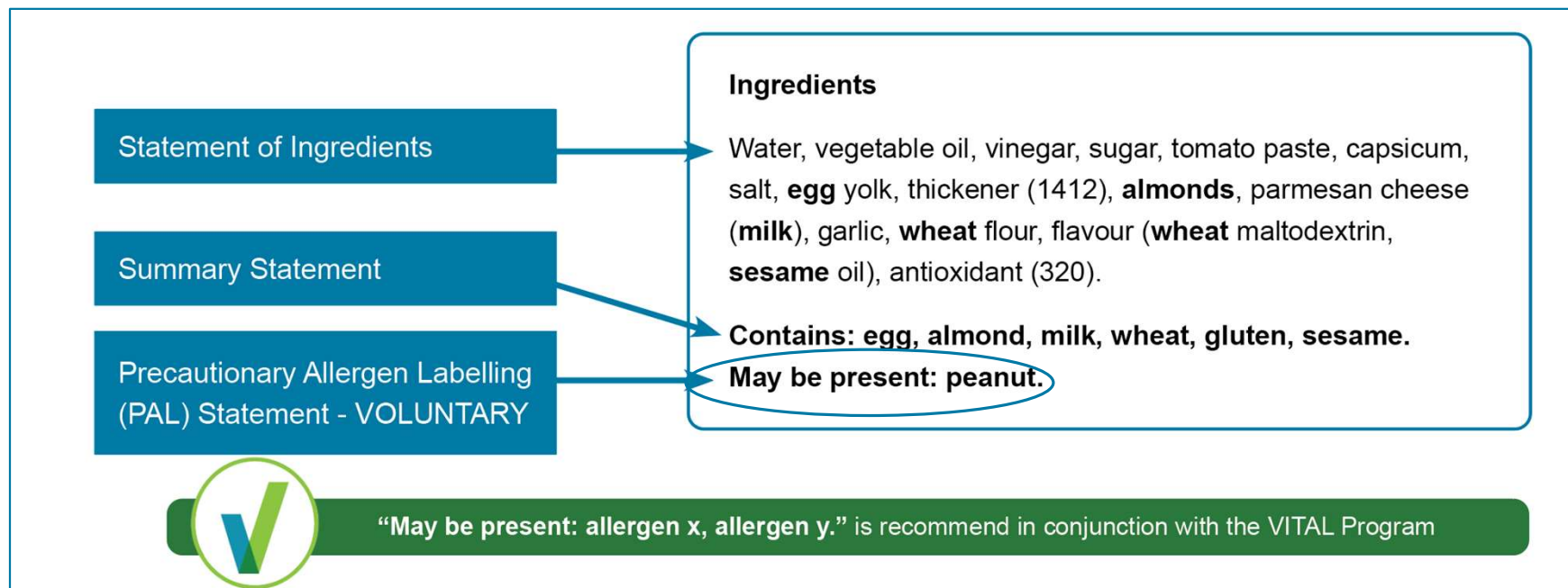
Ingredients

spelt (**wheat**)

Contains: wheat, gluten.

Recommended Labelling Format – the purpose of FIGAML

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



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!

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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.

Bread shop & cafe application

- 1) Food baked elsewhere & sold on site with prepackaged label:
 - All standard labelling requirements apply.
- 2) Food baked & packed on site:
 - Allergens on display as per Schedule 9; or
 - Allergens on label that accompanies the food.
- 3) Food baked for display in assisted service display cabinet
 - Allergens on display as per Schedule 9; or
 - Allergens on label that accompanies the food.

Example “as per schedule 9”:

Contains wheat, oats, gluten, milk, egg, sesame, soy, cashew, almond.

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Bread shop & cafe application

- 1) Food baked elsewhere & sold on site with prepackaged label:
 - All standard labelling requirements apply.
- 2) Food baked & packed on site (FSC1.2.1-8(1)(a))
- 3) Food packaged in the presence of the purchaser (FSC1.2.1-8(1)(b))
- 4) baked for display in assisted service display cabinet (FSC1.2.1-8(1)(f))
 - Allergens is displayed in connection with the display of the food (as per Schedule 9); or
 - Allergens on label that accompanies the food (as per Schedule 9)

Example “as per schedule 9”:

Contains wheat, oats, gluten, milk, egg, sesame, soy, cashew, almond.

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More information will become available soon on the QSR website



ON YOUR TO DO LIST: Review Labels for Compliance

- Almost all allergen declarations for foods will require review.
- Are your specifications/Product Information Forms up to date?
- Review the risks in your processing environment
- Review your Allergen Management Plan
- Refer to industry guidance

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THANK YOU

CONTACT US:



info@allergenbureau.net

www.allergenbureau.net