

Allergen labelling

Mandatory declarations

On 25 February 2021, the *Australia New Zealand Food Standards Code* (Food Standards Code) was amended to introduce new requirements for allergen declarations. The changes were designed to assist allergen-sensitive consumers to find allergen information on food labels more easily. It was intended to broaden their food choices through the use of plain English allergen labelling (PEAL), a consistent format for allergen declarations, and by identifying specific cereals, seafood and tree nuts in allergen declarations.

The Food Standards Code allergen declaration requirements are primarily located in:

- Standard 1.2.3—Information requirements – warning statements, advisory statements and declarations, Division 3 Mandatory declarations; and
- Schedule 9—Mandatory advisory statements and declaration, s9—3 Mandatory declarations.

Implementation

Businesses had three years from 25 February 2021 to implement the new requirements. During this transition period, food businesses could comply with either the previous requirements or the new PEAL allergen declaration requirements. Any food packaged and labelled before 25 February 2024 using the previous requirements may be sold for a further period of two years (stock-in-trade period). The stock-in-trade period ends on 24 February 2026 and after this date all food must comply with the PEAL requirements.

Presentation

Allergens must be declared both in the *statement of ingredients*, and in a distinctly separate *summary statement* next to the statement of ingredients.

In the ingredients list, the allergen declaration must be printed in **bold** font that provides a distinct contrast with other text, in a size of type no less than used for other text. It must be listed separately for each ingredient, e.g. kamut (**wheat**), maltodextrin (**wheat**). It must also be listed as a separate word if it is part of the name of the ingredient, e.g. **milk** powder but not butter**milk**.

The summary statement must be printed in **bold** font in the same typeface and size as the declarations in the statement of ingredients. It must commence with the word 'Contains' then list the required name of each food to be declared (e.g. '**Contains milk**').

Terminology

Allergens must be declared using a *required name*, or mandatory specified term for the allergen source (*Standard 1.1.2—Definitions used throughout the Code*).

- Fish, crustacea and molluscs must be separately declared in both the ingredient list and summary statement, using **'fish'**, **'crustacean'** and **'mollusc'** as required names.
- Tree nuts must be declared separately in the ingredient list and summary statement using the required name– **'almond'**, **'Brazil nut'**, **'cashew'**, **'hazelnut'**, **'macadamia'**, **'pecan'**, **'pine nut'**, **'pistachio'**, **'walnut'**.
- **'Wheat'** must be used as the required name in the ingredient list and summary statement when wheat (or its hybrids) is present. If gluten is present, then **'gluten'** must also be included in the summary statement.
- **'Rye'**, **'barley'** and **'oats'** (if they contain gluten) must be used as the required names in the ingredient list when these cereals (or their hybrids) are present. However, they must be declared as **'gluten'** in the summary statement.
- Soybean must be declared in the ingredient list as either **'soy'**, **'soya'** or **'soybean'** and in the summary statement as **'soy'**.
- The required names for other allergens for use in the ingredient list and summary statement, are **'sulphites'** (when added in concentrations of 10 mg/kg or more), **'milk'**, **'egg'**, **'sesame'**, **'lupin'** and **'peanut'**.
- The term **'processing aid'** (or its plural) must be listed in the ingredient list in association with the allergen/s it contains or is derived from, e.g. processing aids (**wheat, egg**).

Ingredient names

Schedule 10—Generic names of ingredients and conditions for their use has been amended to reflect the use of required names for allergen declarations, as follows:

- conditions for the use of generic names 'cereals', 'fats' or 'oils', 'fish' and 'starch' that relate to allergen declarations have been removed
- the generic name 'nuts' and its condition for use has been removed.

Foods with labelling exemptions

For foods that are subject to labelling exemptions, businesses are still required to declare the presence of allergens, in the form specified in the following table.

Labelling exemption	Required allergen information
Food for retail sale not required to bear a label, such as: <ul style="list-style-type: none"> • whole fruit and vegetables • takeaway food • food made and packaged on the premises from which is sold • food packaged in the presence of the purchaser 	<ul style="list-style-type: none"> • Allergen information must be displayed in connection with the display of the food or provided to the purchaser on request
Exempt from displaying a statement of ingredients on small packages, packaged water and alcoholic beverages	<ul style="list-style-type: none"> • Summary statement must list allergens

Labelling exemption	Required allergen information
Individual portion packs not designed for individual sale	<ul style="list-style-type: none"> Allergen information must be included on labels of individual portion packs
Food sold to caterers	<ul style="list-style-type: none"> Labelling containing allergen information must be provided to the caterer with the food. Allergen information can be provided on inner packaging if the ingredients list is on the outer packaging or in documentation that accompanies the food. Allergen information must be provided with any food not in a package, or packaged fruit and vegetables in clear packaging

Disclaimer

The information provided above is a simplified summary of allergen labelling requirements. If you are developing a food label, please refer to the requirements of the Australia New Zealand Food Standards Code or seek professional advice from an independent labelling consultant.

Resources

Food Standards Australia New Zealand [Allergen labelling for food businesses](#)

[The Allergen Bureau 2023 Food Industry Guide to Allergen Management and Labelling](#)