



Allergen labelling - **Knowing what's in your food and how to label it**

This guide covers the rules for declaring food allergens in the food and drinks you make, import and/or sell.

Why do I need to declare food allergens?

People with a food allergy or a food intolerance need to know what is in their food, so they can decide if it is safe for them to eat it.

Everyone that makes and sells food has a responsibility to give consumers the information they need to make safe choices. There are new rules about labelling and identifying allergens. This guide will help you understand what those changes are and what it means for your business.

New rules for labelling allergens

On 25 February 2021, new rules about labelling and identifying allergens were introduced by Food Standards Australia New Zealand (FSANZ). The new Plain English Allergen Labelling (PEAL) rules will make it easier for consumers to identify what allergens are in food and to help them make safe choices.

Here's a summary of what to do under the new rules:

Required
allergen
name

Use required
allergen names

**Bold
font**

List allergens in
bold font

**Contains:
soy, gluten**

Use mandatory
contains statement



Use individual nut
names of the 9
specified tree nuts



Use 'fish' or
'mollusc' or
'crustacea' as
appropriate



List 'wheat' as a
separate allergen
to 'gluten'

When do the new rules start?

25 Feb 2021:

New rules were made

Businesses can choose to either comply with the existing allergen labelling rules or the new rules.

25 Feb 2024:

Labels must be updated

to meet new rules, and businesses must have trained their staff so the information they give customers meets the new rules.

Any food packaged and labelled before this date, under the existing rules, may be sold for a further 2 years.

25 Feb 2026:

End of transition so all food and drink sold in New Zealand must comply with the PEAL rules.

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Why allergens matter

Dangers of allergens

People with food allergies can have a reaction that could be life threatening within minutes of eating the wrong food for them.

It is important to maintain the integrity of allergen free foods by preparing, cooking, displaying and handling them separately from food with allergens. People with a food allergy or a food intolerance need accurate information about what's in their food, so they can decide if it's safe for them.



A small trace of an allergen can be life threatening.

Some food contains unexpected allergens

Ingredients you use may contain allergens you don't expect, so it's important to read the label or specification sheet so you know what's in them. Always ask suppliers about allergens if full allergen information is not provided at the time of purchase or delivery or you want to confirm the presence of allergens.

Importers must know about the allergen labelling rules in New Zealand. They must get accurate and reliable ingredient information from their overseas suppliers about the foods they import. This is so they can ensure it is labelled correctly and they can pass the information on to their customers.

Here are some examples of foods that may have hidden allergens:



Sulphites



Soy
Gluten
Wheat



Fish



Sulphites



Soy
Wheat
Gluten



Pine nuts
Cashews
Peanuts
Milk



Fish



Egg
Gluten
Wheat



Soy



Sulphites
Milk
Egg



Gluten
Wheat
Soy

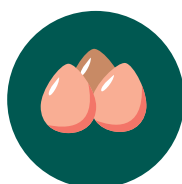


Egg

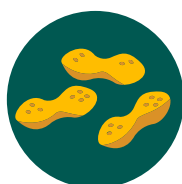
See the [Unexpected Allergens Document](#) for more examples. Full link can be found on [page 11](#)

Allergens that must be declared

Here are the food allergens you need to inform your customers about and must know about in New Zealand:



Egg



Peanuts



Milk



Soy



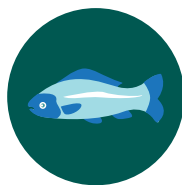
Sesame



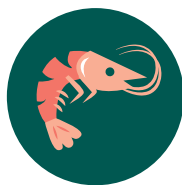
Lupin

Gluten
(barley, oats, rye, wheat)

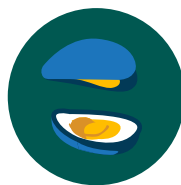
Wheat



Fish



Crustacea



Molluscs



Sulphites



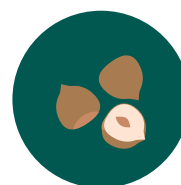
Almonds



Brazil nuts



Cashews



Hazelnuts



Macadamias



Pecans



Pine nuts



Pistachios



Walnuts

Other allergens

There are some other allergens that you may need to declare on your product. These have special rules for how to declare them. See [page 10](#) for more information. These are: Royal jelly, Bee pollen and Propolis.

Overview of the allergen labelling rules

REQUIRED ALLERGEN NAMES

Here is how to phrase the allergen in the ingredients list compared to the contains statement. You can use the singular or plural form.

INGREDIENTS LIST	CONTAINS STATEMENT & OTHER DECLARATIONS
barley	gluten
oats	gluten
rye	gluten
wheat	wheat, gluten
almonds	almonds
Brazil nuts	Brazil nuts
cashews	cashews
hazelnuts	hazelnuts
macadamias	macadamias
pecans	pecans
pine nuts	pine nuts
pistachios	pistachios
walnuts	walnuts
crustacea	crustacea
mollusc	mollusc
egg	egg
fish	fish
lupin	lupin
milk	milk
peanuts	peanuts
sesame	sesame
soy, soya or soybean	soy
sulphites*	sulphites*

*added sulphites – level 10 mg/kg or more

All allergens (except added sulphites less than 10 mg/kg) must be declared no matter how little is in the food you make or sell. There are some exemptions to this. See [page 10](#) for more detail.

If an allergen is an ingredient, part of a compound ingredient**, a food additive, or is used as a processing aid, you must put this on your label.

** A compound ingredient is an ingredient made up from two or more ingredients e.g. cheese as an ingredient in a cheese scone.

In an ingredients list and contains statement, allergens must be written in **bold**. For further formatting requirements, see [page 7](#).

If you use a processing aid that is an allergen source, the allergen should be declared in the ingredients list, e.g. processing aid (**egg**), and in the contains statement e.g. **Contains egg**.

Some generic names are no longer allowed to be listed in the ingredients list, e.g. nuts.

The contains statement must start with the word 'Contains' and then list the allergens. It should have no other words. See [page 7](#) for more detail.

Where do you declare allergens?

Where you declare your allergens depends on what type of label your product is required to have.

Products that need a label but no ingredients list

Some products have a label but don't need an ingredients list. The following products need to be labelled, but don't need an ingredients list:

- packaged water,
- standardised alcoholic beverages**,
- food in a package with less than 100cm² total surface area,
- individual packs sold in a multi-pack (not intended for individual sale),
- food sold to food service businesses for use as an ingredient e.g. restaurants,
- single ingredient foods (e.g. milk).

The above products don't need an ingredients list but still need to display the required allergen name* on the label, but it doesn't need to be bold or in any particular place.

** beer, cider, fruit wine, fruit wine product, liqueur, mead, perry, spirit, vegetable wine, vegetable wine product, wine, wine product.

Allergens must be:

on the label (using the required allergen name*)	✓
In bold font	optional
In the same font and size as in the ingredients list	not required
In a specific place	not required



This product is sold directly to food service businesses for use as an ingredient. This means the label does not require an ingredients list, but any allergens must be declared on the label using the required allergen name*.

It does not require the word 'contains' and the allergen doesn't need to be in bold font.

Products not requiring a label

Some products don't need a label, for example:

- food sold in cafes for immediate consumption,
- delivered pizza,
- pick and mix lollies in a shop.

You need to declare allergens using the required allergen name* (e.g. on a menu, provided to customers who ask).

For more information visit: www.mpi.govt.nz/food-business/labelling-composition-food-drinks/documents/

Allergens must be:

Declared (using required allergen name*)	✓
In bold font	not required
In the same font and size as in the ingredients list	not required
In a specific place	not required

Products with a label and an ingredients list

Food labels that need an ingredients list must have allergens declared within the ingredients list and in a contains statement.

Ingredients list

This is where you list all of the ingredients in your food. You need to:

- list your ingredients in descending order,
- list any food additives you've used,
- list any 'processing aid' if used and whether it is from an allergen source,
- include the allergens using their required allergen name* in bold, with font no smaller than the rest of your ingredients.

Allergens in the ingredients list must be:

Written using required allergen name*	✓
Repeated for each ingredient that contains that allergen	✓
In bold font	✓
In a font no smaller than the rest of the ingredients list.	✓

Wording specifics for the ingredients list

When declaring allergens you can either:

- 1 bold** the part of the ingredient that mentions the allergen. For example:
 - **egg** whites,
 - **milk**,
 - **wheat** flour, or
- 2** after the ingredient, write the allergen in brackets in a **bold** font. For example:
 - cream (**milk**),
 - spelt (**wheat**),
 - Processing aid (**egg**) or Processing aid containing **egg**,
 - Whey powder (**milk**) or Whey powder (from **milk**) or Whey powder (made from **milk**).

Some ingredients may seem like they have the allergen in their name such as Oatmeal and Buttermilk, but you can't bold part of a word. The correct way to write them, for example, is Buttermilk (**milk**), and Oatmeal (**oats**).

Contains statement

The contains statement is a new requirement.

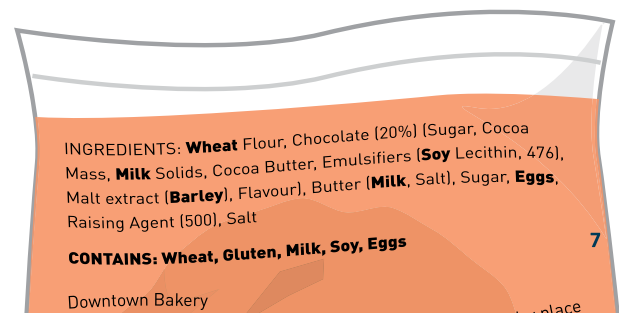
- The contains statement must be distinctly separate but next to (or above or below) the ingredients list.
- It must start with the word 'Contains' and only list the allergens using their required allergen name* and no other words,
- The whole contains statement must be in **bold**, in the same font and size as the ingredients list.

Allergens in the contains statement must be:

Written using the required allergen name*	✓
In bold font	✓
In the same font and size as the ingredients list	✓
Using no other words (e.g. 'and', 'processing aid')	✓
The contains statement must be separate from but next to the ingredients list.	✓

This product is for retail sale so requires an ingredients list and a contains statement.

*The required names for the allergens can be found in the table on [page 5](#).



Allergen word changes

- What to use under the new rules:



'Shellfish'
'Seafood'

You can no longer use general terms like 'shellfish' or 'seafood' on your label.

Instead, you need to use the words 'mollusc' or 'crustacea' or 'fish' to describe the allergen that is present.

Some examples of mollusc are:

- clams
- cockles
- cuttlefish
- kina
- mussels
- octopus
- oysters
- periwinkles
- pipi
- paua
- sea snails
- scallops
- squid
- tuatua

Some examples of crustacea are:

- crab
- crayfish
- lobster
- scampi
- shrimp (crevette)
- prawns

Note: Molluscs refer to marine molluscs only, land molluscs (e.g. snails) do not need to be declared



'Tree nuts'
'Nuts'

You can no longer use the term 'Tree nuts' or 'nuts' on your label.

Instead, you need to declare the specific nut used.

The nuts you must declare:

- almond
- Brazil nut
- cashew
- hazelnut
- macadamia
- pecan
- pine nut
- pistachio
- walnut

Other nuts:

Only these listed nuts need to be identified as allergens. If you are using another type of nut, (e.g chestnuts), it must be declared in the ingredients list, but shouldn't be in bold.

Peanuts are not a tree nut, they are a legume and need to be declared separately.



'Cereals containing gluten'

You can no longer use the term 'Cereals containing gluten'. Instead, in the ingredients list you need to specify the type of cereal used and bold it. The contains statement should also specify 'gluten' or 'wheat, gluten' if it contains both.



'Dairy'

You can no longer use the term 'Dairy' to declare the presence of an allergen on your label. Instead, you need to use 'milk' to describe the allergen present.

Examples of labels with the new wording:

Here are some examples of ingredients lists with contains statements showing current rules and new rules:

CURRENT RULES



Ingredients:

water, potato, corn, hoki (5%), shrimp (4%), cream, onion, mussels (2%), celery, corn starch, salt, olive oil, parsley, sugar, garlic, black pepper, lemon juice, chilli powder

NEW RULES

Ingredients:

water, potato, corn, hoki (5%) (**fish**), shrimp (4%) (**crustacea**), cream (**milk**), onion, mussels (2%) (**mollusc**), celery, corn starch, salt, olive oil, parsley, sugar, garlic, black pepper, lemon juice, chilli powder

Contains: fish, crustacea, milk, mollusc

FOLLOWING CURRENT RULES



INGREDIENTS -

Peanuts, dark chocolate (sugar, cocoa mass, cocoa butter, milk fat, emulsifier (soy lecithin), natural flavour), glucose syrup, chicory fibre, corn maltodextrin, sunflower oil, glycerine, natural flavour, salt, emulsifier (soy lecithin), sugar syrup, tree nuts

ALLERGENS -

peanuts, milk, soy and tree nuts

FOLLOWING NEW RULES

INGREDIENTS -

Peanuts, dark chocolate (sugar, cocoa mass, cocoa butter, **milk** fat, emulsifier (**soy** lecithin), natural flavour), glucose syrup, chicory fibre, corn maltodextrin, sunflower oil, glycerine, natural flavour, salt, emulsifier (**soy** lecithin), sugar syrup, **almonds, pecans**.

CONTAINS -

peanuts, milk, soy, almonds, pecans

FOLLOWING CURRENT RULES



Ingredients: Wheat flour, Sugar, Vegetable oil, Salt, Eggs, Condensed milk, Baking Powder, Emulsifier (Soy lecithin), Flavour, Colours (102, 110), Antioxidant (307b)

Contains: Cereals containing gluten, Eggs, Milk, Soy

FOLLOWING NEW RULES

Ingredients: **Wheat** flour, Sugar, Vegetable oil, Salt, **Eggs**, Condensed **milk**, Baking Powder, Emulsifier (**soy** lecithin), Flavour, Colours (102, 110), Antioxidant (307b)

Contains Wheat, Gluten, Eggs, Milk, Soy

Extra Information

Ingredients exempt from allergen labelling

Some ingredients are exempt from allergy labelling rules. These ingredients have been assessed as safe because they are manufactured in a way that makes them suitable for people with allergies:

- glucose syrups made from wheat starch (subject to gluten max limit 20 mg/kg),
- fully refined soy oil,
- soy derivatives (tocopherols and phytosterols),
- distilled alcohol from wheat or whey,
- gluten/wheat in beer or spirits,
- isinglass (fish) used in beer or wine.

'May Contain' statements

Some food labels use 'may contain' or 'may be present' statements about certain allergens, such as 'may contain peanuts'. These are voluntary statements made by food businesses that are not regulated by the allergen rules covered in this guidance.

We do not recommend blanket 'may contain' statements, if these statements are used on labels we suggest that they are only used when the allergen management plan put in place by the food business identifies a risk.

Compound ingredients

When declaring a compound ingredient in your ingredients list, the allergen in the name of the compound ingredient is not required to be bolded. It is the individual ingredients that contain allergens that are required to be bolded. For example the ingredient egg fettuccine, when used in a prepared meal, would be declared as:

Ingredients: Egg Fettuccine (Durum **Wheat** Semolina, **Egg**)
Contains: **Egg, Gluten, Wheat.**

Processing aids

Processing aids are used to perform a technical function during the manufacturing of food (e.g. clarifying agent, anti-stick agent) but not in the final food. They are not required to be included in the ingredients list unless they contain an allergen. The specific name of a processing aid is not required. Food businesses should check if their suppliers have used any processing aids that may be a source of allergens that must be declared.

Other allergens

There are some other allergens that you may need to declare on your products. (Note: These rules have not changed in the Plain English Allergen Labelling update). In the table below is a list of the foods/ingredients that need to be declared and the type of statement required:

Allergen	Statement	Wording for statement	Specifications
Royal jelly or food containing royal jelly	Warning statement	This product contains royal jelly which has been reported to cause severe allergic reactions and in rare cases, fatalities, especially in asthma and allergy sufferers.	You must use these exact words and they must be 3 mm or bigger (or > 1.5 mm for small packages).
Bee pollen or a food containing bee pollen	Advisory statement	You can choose the words to use but you must indicate the product contains bee pollen which can cause severe allergic reactions.	No exact specifications.
Propolis or a food containing propolis	Advisory statement	You can choose the words to use but you must indicate that the product contains propolis which can cause severe allergic reactions.	No exact specifications.

Useful links

Food labelling guides

Different labelling rules apply depending on who your food is sold to. New Zealand Food Safety has published guidance for labelling foods to sold to these customers:

- **A Guide to Retail Food Labelling**
www.mpi.govt.nz/dmsdocument/2965-A-guide-to-food-labelling
- **A Guide to Labelling Food Sold to Caterers/ Food Service Businesses**
www.mpi.govt.nz/dmsdocument/45112-A-Guide-to-Labelling-Food-Sold-to-CaterersFood-Service-Businesses
- **A Guide to Labelling Food Supplied to a Food Manufacturer or Processor**
www.mpi.govt.nz/dmsdocument/45109-A-Guide-to-Labelling-Food-Supplied-to-a-Food-Manufacturer-or-Processor

Specific product labelling guides

Guidance for labelling specific foods:

- **Honey:**
www.mpi.govt.nz/dmsdocument/26491-a-guide-to-new-zealand-honey-labelling
- **Alcoholic Drinks:**
www.mpi.govt.nz/dmsdocument/31404-a-guide-to-alcoholic-drinks-whats-in-them-and-how-to-label
- **Labelling Food Containing Hemp Seeds:**
www.mpi.govt.nz/dmsdocument/31608-A-Guide-to-Labelling-Food-Containing-Hemp-Seeds

Useful websites

- **Allergen declarations, warnings, and advisory statements on food labels:**
www.mpi.govt.nz/food-business/labelling-composition-food-drinks/allergen-declarations-warnings-and-advisory-statements-on-food-labels/
- **Allergen Bureau**
allergenbureau.net/
- **Allergen bureau - Unexpected Allergens in Food**
allergenbureau.net/wp-content/uploads/2021/08/Unexpected-Allergens-in-Food-Aug-2021.pdf
- **Food allergen portal**
www.foodstandards.govt.nz/consumer/foodallergies/foodallergenportal/Pages/default.aspx
- **Food Standards Code - Plain English Allergen Labelling**
Standard 1.2.3: www.legislation.gov.au/Series/F2015L00397
Schedule 9 www.legislation.gov.au/Series/F2015L00479
Standard 1.2.1: www.legislation.gov.au/Series/F2015L00386
Standard 1.2.4: www.legislation.gov.au/Details/F2021C00290
- **CODEX Code of Practice on Food Allergen Management for Food Business Operators**
www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?Ink=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXC%2B80-2020%252FCXC_080e.pdf

If you still need help, we recommend you contact a food labelling consultant to help write your label.

www.mpi.govt.nz/food-business/starting-a-food-business/hiring-a-food-consultant/

For questions about food rules and food safety, visit www.mpi.govt.nz/food-business, email: info@mpi.govt.nz or call 0800 00 83 33.

Checklists for updating your products to meet the new rules

Use these checklists to help you update your label or the information you provide to consumers or other businesses, to meet the new allergen labelling rules.

Use checklist A for:

- for products that do not require an ingredients list on their label,
- for products not requiring a label.

Use checklist B for:

- for products that require an ingredients list on their label.

Checklist A: For products that do not require an ingredients list on their label & products not requiring a label

Complete one checklist per product

I have identified:	Completed	Comments If the item is not applicable for your product write N/A in the comments box
• all of the inputs (ingredients, food additives and processing aids) used to make my food	☐	
• the allergens present in each of the above inputs	☐	
I have declared the allergens by:	☐	
• using the required allergen names	☐	
I have declared the allergens:	☐	
• on the product label	☐	
• on the label of individual packs sold in a multi-pack (not intended for individual sale)	☐	
• in a separate document to be supplied with the product	☐	
• in the information available for consumers on request	☐	
• other (please specify):	☐	

Checklist B: For products with a label and an ingredients list

Complete one checklist per product

I have identified:	Tick once complete	Comments If the item is not applicable for your product write N/A in the comments box
all of the inputs (ingredients, food additives and processing aids) used to make my food	☐	
the allergens present in each of the above inputs	☐	
I have declared the allergens in the ingredients list on the label by:	☐	
using the required allergen names	☐	
listing them as separate words (e.g buttermilk (milk))	☐	
putting the allergens in brackets (if needed)	☐	
making sure that the allergens are in bold font ,no smaller that the rest of the text in the ingredients list	☐	
declaring the term 'processing aid' in association with the allergens it contains	☐	
I have declared the allergens in a Contains statement on the label:	☐	
starting with the word 'Contains'	☐	
using the required allergen names and no other words	☐	
making sure that the Contains statement is in bold font, in the same font and size as in the ingredients list	☐	
placed the Contains statement next to the ingredients list on my label	☐	

Food businesses that use the Simply Safe & Suitable template food control plan can use their "Allergens in your food" record blank with this checklist for each product. The record blank can be found here: www.mpi.govt.nz/food-safety-toolkit/food-act-2014-food-safety-toolkit/