



**PEAL Food Allergen  
Labelling Australia:  
A Complete Guide to the  
New Legal Requirements**



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# Contributing Expert

Janine works in Ashbury's Australia Regulatory Team, supporting clients and the internal Ashbury teams with regulatory queries focused on Australian food law.

She has nearly a 20-year history of providing exceptional regulatory, legal and compliance advice across food product development in the FMCG sector.

She holds a PhD(law) in Australia's food regulatory compliance framework, a Bachelor of Laws and a Bachelor of Science in Microbiology. She has deep knowledge of the Food Standards Code and Australian consumer laws to ensure compliance and identify opportunities for competitive marketing with labelling and advertising claims.

She brings strong experience in EU/US food laws and in guiding international manufacturers to introduce products to the Australian market that meet manufacturers' commercial and competitive needs.

Janine is a food fraud expert who has led domestic and international investigations, advising on prevention frameworks and pioneering research in this emerging field, creating regulatory education for commercial food producers and in international tertiary settings.



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# What is PEAL Labelling?

All foods sold in Australia and New Zealand must comply with the Australian New Zealand Food Standards Code (ANZFS), which includes all requirements for allergen declarations.

On 25th February 2021, changes were introduced into law via the 'Plain English Allergen Labelling' - 'PEAL' - amends to ANZFS. The requirements can be found in [ANZFS Std 1.2.3](#) and [Schedule 9](#).

PEAL outlines how the major allergens in Australia should be labelled on a packaged food product.

In this guide, Dr Janine Curll, Regulatory Manager at Ashbury Australia, summarises the new legal requirements to assist food businesses in updating food and beverage labels and achieving compliance before the end of the PEAL transition period.



# Why is PEAL Labelling being introduced?

Allergen labelling is one of the most important aspects of a product's labelling. Allergic consumers rely on this information to determine whether food is safe and suitable for consumption. Globally, the number of consumers who suffer from allergies is rising and there have been many allergen exposure-related incidences in the food industry over the years, with consumers facing serious injury and even death due to incomplete or unclear allergen information.

The PEAL updates aim to improve allergen information provision by presenting the prescribed allergens in plain English, creating a consistent and easily understood format across food labels that makes it easier for consumers to read and understand.



# Understanding allergen labelling

To discuss the changes that are required, it is important to first understand what constitutes allergen labelling. There are two main attributes: the Statement of Ingredients and the Summary Statement. The new requirements impact how these should appear on your label.

## Statement of Ingredients

This is the declaration of allergens within your ingredients list.

## Summary Statement

This is the statement that appears alongside your statement of ingredients, reiterating the presence of any allergens. It has previously been voluntary.

# What changes need to be made to current allergen labelling?

The new requirements can be considered under three main categories of changes:



## TERMINOLOGY

used to declare the allergens.



## FORMAT

of the allergen text.



## LOCATION

of the allergen information.



# Terminology

## Required Names:

'Required names', as per [Schedule 9](#), must be used (see table A below). Required names are acceptable in either plural or singular format.

Previously, general terms such as 'seafood' and 'tree nuts' could be used on your labels. You must now declare using the required name; for example:

- Each nut name must be used when the tree nut is one of the nine included for declaration: almond, brazil nut, cashew, hazelnut, macadamia, pecan, pine nut, pistachio and walnut.
- Seafood must be declared as fish, crustacea or mollusc.
- Where 'cereals containing gluten' was once used, you must now specify the type of cereal and bold it. The changes are outlined in Table A (page 9) and Table B (Page 10) below.

## Summary Statement:




This is a new mandatory requirement and is used to isolate and clearly indicate the presence of allergens. The terminology used must be 'Contains', followed by the relevant required names.



**"Watch out as some 'required names' differ between the Statement of Ingredients and the Summary Statement. For example, Gluten is included in the Summary Statement but not in the Statement of Ingredients when declaring a gluten-containing cereal such as wheat."**



**Table A: Required Names of Allergens for Declaration on a Food Label Old vs New**

<p><b>OLD</b></p>	<p><b>NEW</b></p>
 <p><b>'Tree nuts'</b></p>	<p>Almond, brazil nut, cashew, hazelnut, macadamia, pecan, pine nut, pistachio, walnut (no other tree nuts need to be declared)</p>
 <p><b>'Soybeans'</b></p>	<p>Statement of Ingredients: Soybean, Soy or Soya</p> <p>Summary Statement: 'Soy' only</p>
 <p><b>'Cereals containing gluten'</b></p>	<p>Statement of Ingredients: Wheat, Barley, Rye, Oats</p> <p>Summary Statement: Wheat, Gluten (for the presence of wheat) Gluten (for the presence of barley, rye, oats)</p>
 <p><b>'Seafood' / 'Fish' / 'Shellfish' / 'Crustacea'</b></p>	<p>Fish, Crustacean, Mollusc</p>

**Table B: Required names for declaration of allergens in Australia**

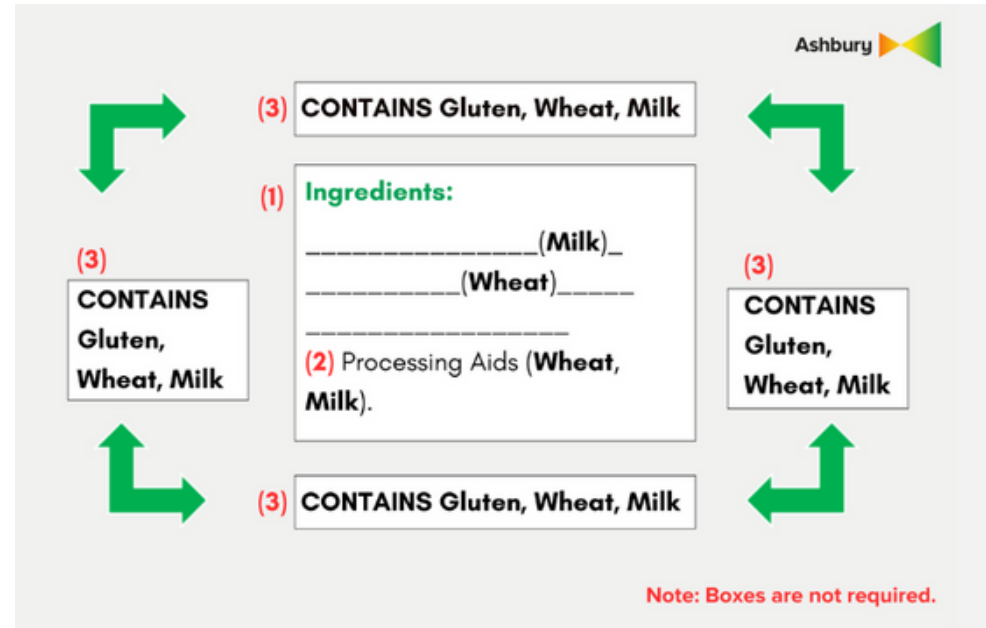
Statement of Ingredients	Contains Statement
Sulphites	Sulphites
Barley, Oats, Rye	Gluten
Wheat	Gluten, Wheat
Almond	Almond
Brazil nut	Brazil nut
Cashew	Cashew
Hazelnut	Hazelnut
Macadamia	Macadamia
Pecan	Pecan
Pine Nut	Pine Nut
Pistachio	Pistachio
Walnut	Walnut
Crustacean	Crustacean
Egg	Egg
Fish	Fish
Lupin	Lupin
Milk	Milk
Mollusc	Mollusc
Sesame	Sesame
Soy, soya or soybean	Soy



# Location

New requirements for the location of the Statement of Ingredients and Summary Statement are specified in the new legislation:

- (1) The Statement of Ingredients must declare allergen required names for each ingredient.
- (2) Allergens in processing aids must now be declared at the end of the Statement of Ingredients.
- (3) Distinctly separate Summary Statements must be within the same field of view and directly next to the statement of ingredients.



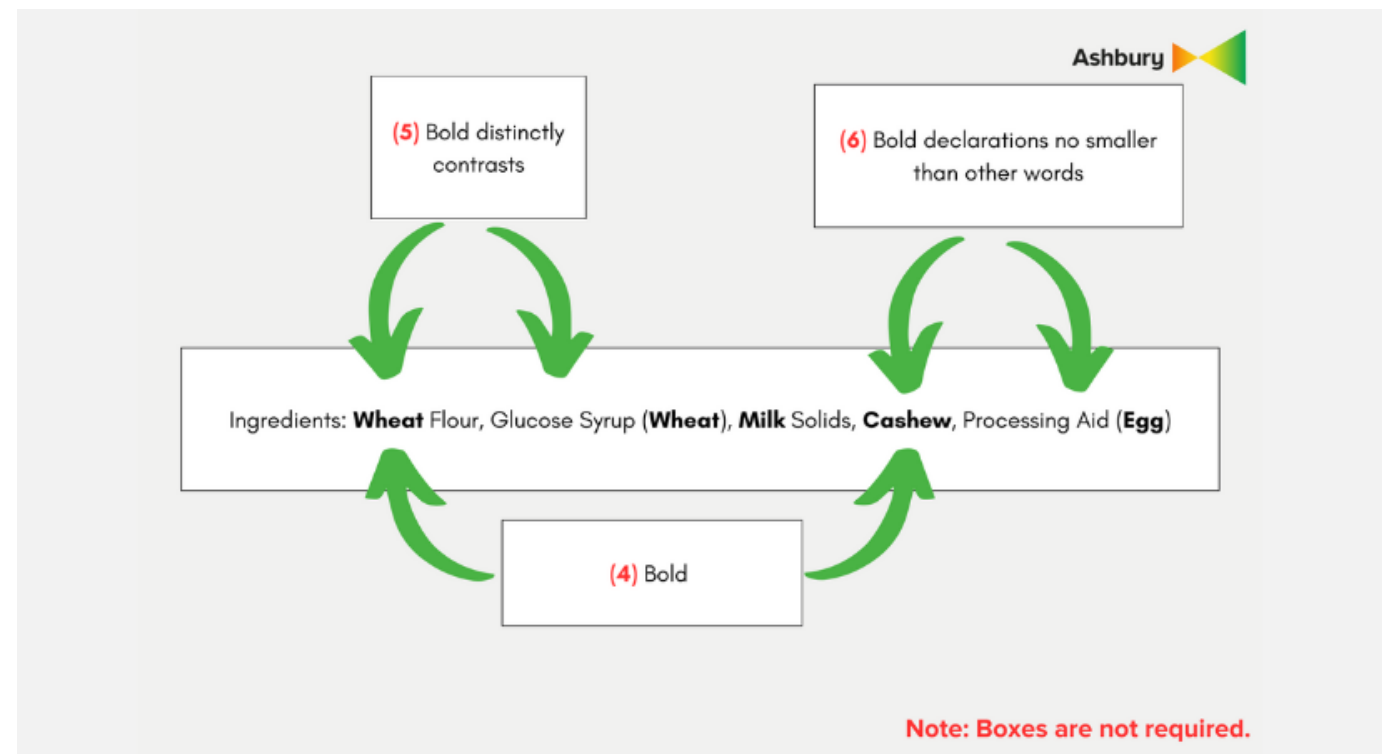
The illustration above represents the distinctly separate summary of ingredients. This statement can be to either side, above or below the Statement of Ingredients.

# Format

## Format of the Statement of Ingredients allergen declarations:

- (4) Must be in **bold** font.
- (5) The bold font must contrast distinctly with all other text within the ingredients list.
- (6) The type size for bold declarations must be no less than that of the other text.

## Example:



**Format of the Summary Statement:**

- (7) Must be in bold font (including 'contains') and should contrast distinctly with other text in the Statement of Ingredients.
- (8) The size of type and font must be the same for the declarations in the Statement of Ingredients.
- (9) Must contain no other words or allergens not required for Australia

**Example:**

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**(7) (8) CONTAINS Gluten, Wheat, Milk**

**Note: Boxes are not required.**



## 24TH FEB 2021

New Rules Introduced.

## 24TH FEB 2024

New Rules Enforced. Any foods placed on the market from this date must comply with PEAL requirements. Any foods already on the shelf with existing declarations before this date can be legally sold for a further two years.

## 24TH FEB 2026

Transition Ends. All food on the market in Australia and New Zealand must comply with PEAL rules.

# Timeline

# Common Questions

## What Products Does PEAL apply to?

PEAL labelling requirements apply to all general foods and beverages required to bear a label and intended to be sold via retail in Australia and New Zealand.

## Are there any Exemptions to PEAL?

Two specific food categories - Foods for Special Medicinal Purposes and Infant Formula for Special Dietary Use - are expressly exempt from PEAL. Labels on products in these categories must continue to declare allergens with existing declarations.

Additionally, retail food not required to bear a label, food sold to caterers and food exempt from possessing a statement of ingredients (such as small packages, single-ingredient foods and individual portion packets), must declare allergens using the required names (listed in table B above), but they are exempt from the location and formatting requirements.

Please note, the pre-PEAL allergen labelling exemptions for specific substances where processing render these substances safer for people with allergies have not changed. Where the conditions in the regulations are met, the substances continue to be exempt from declarations (see: [Schedule 9 - 3 table, column 2](#)). Food businesses are reminded to ensure they have the information necessary to determine the exemptions that apply to the foods and substances used.

## What about PAL and other allergen labelling?

When launching a brand-new product, it's important not to get carried away and be mindful of any marketing, ingredients, or 'health' claims you intend on making. Get yourself familiar with the regulatory limitations that governments set on health or nutritional claims, otherwise you may face enforcement action. Whether you're a start-up business or a seasoned trader expanding your range, knowing what you do know (and what you don't) is crucial. If you don't know the answer, asking a product information consultant can provide you with the reassurance and support you need (and reduce the likelihood of you experiencing additional costs associated with noncompliance and revisions).

## Do you need to label allergens in processing aids?

Any presence of allergens, whether they were added by you, existing in your ingredients or used as a processing aid, must all be declared on the label in this way.

## Are there any new allergens to label?

No brand new allergens for declaration have been introduced, however, how they are labelled has changed, for example, 'Mollusc' is now specifically used for this allergen and fish or shellfish is no longer sufficient.



# Mistakes to avoid when applying PEAL:

Food businesses are encouraged to ensure all three categories of changes discussed above, are applied to each label used on food for sale in Australia and New Zealand.

These are some examples of common challenges we have seen and recommended that companies watch out for.

- > **Avoid bolding the word ‘ingredients’ at the start of the Statement of Ingredients**
- > **Don’t use tree nuts when individual nut names (the nine allergenic nuts) are now required**
- > **Use only the required name as set out in Table B.**
- > **Make sure to bold all instances of the required name in the Statement of Ingredients.**
- > **Don’t include allergens in the Summary Statement from other markets e.g celery, coconut, mustard.**
- > **Keep size of the text consistent between the bolded name in the Statement of Ingredients and the Summary Statement.**
- > **Only bold the allergen-related word, e.g. ‘egg’ in egg whites.**

# Complying with PEAL

## How Ashbury can help

Calling in experts when you need support with food regulations or labelling can reduce the likelihood of potential risk to your brand and consumers. Ashbury experts can offer flexible support to help you tackle the additional work that PEAL regulations are creating for your business:

- [Food Labelling Training Australia](#)
- [Food Label Review](#)
- [Allergen Regulatory Advice](#)

Get in touch: [hello@ashbury.global](mailto:hello@ashbury.global)



Click here to watch our short video on PEAL.

Ashbury



## About Ashbury

Founded in 2011, Ashbury is the trusted regulatory compliance partner for retailers and brands globally.

Our powerful team of experts is dedicated to protecting brands and their consumers through accurate and compliant product information.

We work in strategic partnership with our clients as an extension of their team, providing multicategory and multinational labelling compliance services to ensure every product launched makes it on shelf with complete accurate and compliant product information.

**We make global food labelling compliance easy.**



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