

Plain English Allergen Labelling (PEAL)

Ashbury

A Summary

All foods supplied for sale in Australia and New Zealand must now comply with the 'Plain English Allergen Labelling' or PEAL updated regulations. Below is a summary of the Q&A answers from the session for you to use as reference when applying PEAL to your products.



Chemlinked Webinar Q&A Takeaways

- "Contains", at the start of the Summary Statement does NOT need to be in uppercase.
- The allergen summary statement is necessary to be displayed when allergens are mentioned in the list of ingredients.
- PAL does NOT need to be bold as shown in the example
- For soybean oil, if the oil meets the requirement for exemption from declaration in Schedule 9 - degummed, neutralised, bleached and deodorised (or soybean derivatives that are tocopherol or phytosterol) SOY does not need to be declared - this has not changed from the pre-PEAL amended Standard 1.2.3.
- If the ingredient for declaration is gluten instead of cereal containing gluten, it is declared (BOLDED) in the Statement of Ingredients AND Summary Statement will be 'Contains Gluten'.
- The requirement when selling B2B is to provide the buyer with all the information required to compliantly label the final foods for retail sale. It is recommended that the required names are used, but that is not prescribed, as PEAL covers foods sold at retail.
- Royal jelly/propolis can be included in the PAL statement as PAL is not captured by PEAL - it is a voluntary warning statement about cross contamination based on risk assessments.
- Barley is declared (BOLDED) in the Statement of Ingredients and declared as 'Gluten' in the Summary Statement.
- Summary Statements are required on alcoholic products without ingredients lists.
- Spelt is not captured as an allergen for bolding in the Statement of Ingredients.

- When an Artwork is intended for multiple countries including Australia, suppliers can ensure PEAL compliance by providing the AUNZ required information next to the information required in other jurisdictions. Alternatively, cover the other territory regulatory information with an over sticker with AUNZ required regulatory information.
- PEAL is mandatory for all food products regulated by the Australian New Zealand Food Standards Code (ANZSC) and not, for example, complementary medicines or dietary supplements, as these are not products with a regulated standard or meet the definition of food for the purpose of the ANZSC.
- The word 'INGREDIENTS' at the start of the ingredient listing can be bolded, although some retailers and businesses are taking a very conservative approach and choosing not to bold the word INGREDIENTS.
- There is no longer a transitional period (or 'grace period') for compliance with PEAL. The amendment was introduced in February 2001, and the transitional period ran to 24th February 2024 (with a stock in trade exemption for those still on the marketplace following introduction to the market before 24th February 2024).
- Allergen labelling is not mandatory on an outer/secondary package.
- The regulations for food is the same in both Australia and New Zealand - we have a binational arrangement. However, as you can see in the ANZSC, there are standards that may only apply in Australia and New Zealand that have additional food safety/processing standards and additional product standards for food type products that sit outside ANZSC and their regulatory.
- If packaging has limited space, the PEAL requirements still apply to achieve compliance, there is no exemption for small packages from complying with PEAL.
- If barley and oat variants used do not contain Gluten, they still need to be bolded in the Statement of Ingredients - there is no exemption in law.
- Ingredients list should declare ingredients in the form in which they are added, by their common or generic name, e.g. slimmed MILK, full cream MILK, etc., and bold only the required name (not the full name of the ingredient).
- Foods should go through a risk assessment such as VITAL to determine the required allergens to declare in the summary statement and the PAL. The risk assessment must include product packaging and potential of leaching (e.g. casein adhesives) shall/should be declared?

