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# Food Allergen Labelling Guide For Consumers



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[www.allergy.org.nz](http://www.allergy.org.nz)

The **Food Allergen Labelling Guide for Consumers** has been updated to include the changes made in the Food Standards Australia New Zealand (FSANZ) Food Code in relation to Plain English Allergen Labelling (PEAL). These were incorporated in February 2021, to introduce new requirements for the labelling of allergens in food.

These requirements include that allergen information is to be declared:

- in a specific format on the ingredients list, and in a separate summary statement (Contains xxx)
- using simple, plain English terms in bold font

They will also require:

- Molluscs to be declared as a specific food allergen (currently declared as 'fish')
- Specific tree nuts to be declared, e.g. 'almond', rather than just the term 'tree nuts'
- Wheat, barley, rye, oats or their hybrids and gluten to be declared if present (rather than the use of 'gluten' to indicate cereals).

The changes are intended to help people find allergen information on food labels more quickly and easily, so they can better make informed and safe food choices.

However, businesses have 3 years from 25 February 2021 to implement the new requirements. During this transition period, food businesses can comply with either the existing allergen declaration requirements in the Code, or the new requirements.

A 2-year stock-in-trade period will follow the transition period. Any food packaged and labelled with existing allergen declarations before the end of the transition period may be sold for up to 2 years after the end of the transition period. The PEAL changes will be mandatory from February 2026.

Some food businesses have already adopted some of these requirements, but it is important for consumers to understand that they are not yet regulated.

**For example, if a label does not have a 'Contains' statement, it does not mean there are no allergens in the food. Consumers should check the ingredients list every time, regardless.**

## 1. Food allergens that must be declared:

Under NZ's current food regulations, there are 10 food allergens which must be declared if they are intentionally in a food for sale as an ingredient, processing aid, or an additive (or a compound of any of these). They are:

- **Cereals** containing gluten, i.e. **wheat**, rye, barley, oats and spelt and their hybridised strains
- **Crustacea** (e.g. crab, crayfish, prawns and shrimps)
- **Egg** and egg products
- **Fish** and fish products (including **molluscs**)
- **Lupin**
- **Milk** and milk products
- **Peanuts** and peanut products
- **Sesame** seeds and sesame seed products
- **Soybeans** and soybean products
- **Tree nuts** and tree-nut products other than coconut from the palm *Cocos nucifera*.

In some cases, manufacturers might use technical names\* for an allergen and it is important to know what these are for the ones you need to avoid (see the food allergen lists below).

*\*Under the PEAL regulations, from Feb 2026, the foods listed in the Food Code Schedule 9-3 will apply, including the 'Plain English' term for each that will have to be used:*

[Food Standards \(Proposal P1044 – Plain English Allergen Labelling\) Variation \(legislation.gov.au\)](https://www.legislation.gov.au/ultra/idx/food-standards-proposal-p1044-plain-english-allergen-labelling-variation)

## 2. Exemptions

Some forms of food allergens as ingredients have been made exempt from allergen labelling. This is because it has been found that processing, e.g. of highly refined oils, removes the protein in them. They are therefore not considered allergenic, and by exempting them there may be more product options that are safe for food-allergic consumers.

### 3. Where they must be declared

Food allergens must be declared on the labels of packaged foods, or allergen information be provided on request from the consumer if the food is for sale but does not require a label e.g. food sold in delicatessens, cafes, restaurants, catering services, and farmers markets.

#### i) Packaged food

Food allergens are declared on the ingredients list on the label, and there may also be a separate 'Contains xxx' statement\* specifically for allergens. On the ingredients list, it might have the allergen written in bold letters e.g. **wheat** flour, and/or in brackets e.g. margarine (contains **milk**).

*\*Under the PEAL regulations, from Feb 2026:*

- *Allergens declared on the ingredients list will have to be in bold print*
- *a separate 'Contains' (allergen summary) statement will be mandatory.*

**Always check the ingredients' list every time you buy.**

#### ii) Information on request

If you are interested in ordering/buying a meal or food item that doesn't have a label, always ask the food operator about the presence of the food you/your child is allergic to, including

- Whether it is an ingredient in the food for sale (including in any sauces, flavourings or toppings)
- Whether it is used in other food made in that business or kitchen, and if there is any chance of cross-contamination with the food you wish to buy
- To check labels on ingredients where the allergen might be 'hidden' (refer to the lists below)

### 4. 'May contain' statements

'May contain' statements, otherwise known as 'Precautionary Allergen Labelling' (PAL), are not regulated. Food businesses are only required to declare allergens intentionally in the food. However, they are required to manage the risk of food allergens getting

unintentionally in the food through accidental cross contact. Where a PAL statement is used, it is a voluntary statement and may be because the food business is not sure they have eliminated the risk of cross contact with a particular allergen.

However, because of lack of regulations, the use of PAL statements is inconsistent, and a variety being used, including 'Made in a factory where...' or 'Made on a line where...'. These are all voluntary and there is no way to determine how safe they are to you, the consumer.

Consumers are therefore recommended to avoid the food concerned.

### 5. 'Free from' statements

'Free from' statements are also voluntary, i.e. not regulated under our food legislation. However, under the NZ Fair Trading Act, claims such as 'free from' must be able to be proved.

[Commerce Commission - Making accurate claims \(comcom.govt.nz\)](http://comcom.govt.nz)

### 6. Where to go for more information

If you are unsure whether a product is safe or not, based on the information on the label, it is best to call the manufacturer. All manufactured food is required to have the contact details for the manufacturer (or distributor if it is an imported food) on the label.

### 7. Making a complaint

If you are concerned a food product has an undeclared allergen in it (e.g. you/your child had an unexpected reaction), or the label or information provided is misleading in some way, you can contact the Ministry of Primary Industries (MPI). Call **MPI's consumer food safety line on 0800 00 83 33** or email [info@mpi.govt.nz](mailto:info@mpi.govt.nz)

You can also contact **Allergy New Zealand** if you need any advice about allergen labelling and making complaints – call **0800 34 0800** or email [allergy@allergy.org.nz](mailto:allergy@allergy.org.nz)

MPI may issue a food recall if a complaint is upheld. You can subscribe to MPI's email alerts for all food allergen recalls by going to <http://www.mpi.govt.nz/news-and-resources/subscribe-to-mpi/>

### 8. Other things to be aware of

- Avoid bulk bins in supermarkets as these can be easily contaminated by other foods, including items dropping down from one bin to another, or tongs or scoops being used for different items. Similarly, take care when purchasing food from the delicatessen section.
- Teach your child not to accept food without your permission, such as from people offering food tastings in supermarkets.
- Beverages are also required to declare allergens so check these as well.
- Non-food items such as medications, cosmetics, skin creams and dental products can also contain food allergens.

The Australasian Society of Clinical Immunology and Allergy (ASCI) has diet sheets which are available on:

<https://www.allergy.org.au/patients/food-allergy/ascia-dietary-avoidance-for-food-allergy>

**Please note the lists below are not comprehensive and there may be other foods or ingredients that should be avoided. If in doubt, always ring the manufacturer.**

## Cereals containing gluten

These are wheat, rye, barley, oats and spelt and their hybridised strains. Gluten is a protein which is common in these cereals; these must be strictly avoided by people who have coeliac disease or are intolerant to gluten.

However, the most common food allergy to cereal is wheat allergy. People with wheat allergy may be able to tolerate other cereals. However, it is sometimes unclear from labels which cereals are present and which are not. In these cases, avoid any food labelled as containing gluten.

*Under the PEAL regulations, from Feb 2026, barley, rye, and/or oats will have to be declared (including hybridised strains thereof) if they contain gluten. However, wheat (including its hybridised strain) will have to be declared irrespective of whether it contains gluten.*

## Wheat

Avoid these:		May contain wheat protein	
Atta flour	Risone	Baking powder	Liquorice
Bakers flour	Seitan	Baked goods (e.g. breads, biscuits, crackers, cakes, pastry etc)	Maltodextrin
Bran	Semolina	Batter	Marshmallows
Bulgar	Spelt	Breadcrumbs	Muesli
Burghul	Tabouleh	Cornflour	Noodles
Cracker meal	Triticale	Confectionery	Pasta
Couscous	Wheat	Cereals	Soy sauce (shoyu)
Durum	Wheat:	Croutons	Spices
Farina	-bran	Dessert mixes	Starch (edible, gelatinised, modified, vegetable, wheat)
Gluten	-flour	Flavourings	Stuffing
Graham flour	-germ	Glucose syrup	Surimi
Kamut	-malt	Icing sugar	Tinned and processed foods
Matzoh	-meal	Textured or hydrolysed protein (TVP, HVP)	
Pasta (e.g. fettucine, spaghetti, lasagne)	-starch		
	-berries		
<b>Exemptions:</b>			
Glucose syrups made from wheat starch, refined, and have a gluten protein content that does not exceed 20 mg/kg; or alcohol distilled from wheat.			

## Egg and Egg products

Avoid these ingredients		Avoid these foods	
Albumen or albumin	Livetin	Baked foods with eggs such as cakes, muffins	Omelette, soufflé, frittata
Apovitelin	Lysozyme	Egg (white or yolk)	Pancakes, pikelets
Dried Egg	Ovalbumin	Egg	Pastries (e.g. chocolate eclairs, cream puffs, tarts, pies)
Egg solids	Ovomucoid	Noodles	Pavlova
Flavoproteins	Ovovitelin	French toast	Quiche
Glaze (on baked goods)	Powdered egg	Fritters	Waffles
Globulin	Silici	Meringue	
Imitation egg product	albuminate	Meringue mix	
	Simplese		

## Lupin

Lupin is a legume and is related to other legumes, such as peanut and soy. In Europe, where lupin flour and bran are widely used in a variety of baked goods such as bread, muffins and cakes and pasta products, there has been mandatory allergen labelling for food products containing lupin since 2007.

The use of lupin-derived ingredients has increased in food products in Australia in recent years and has the potential to be an allergen. However, in New Zealand, it is currently not well-known or prevalent as an allergen, believed in part due to the current low use of lupin-derived ingredients here.

For more information refer to the ASCIA diet sheets on [www.allergy.org.au](http://www.allergy.org.au)

## Milk and Milk Products

This applies to all milk and dairy products from Cow's milk as well as other mammalian milk such as Goats and Sheep milk and their products.

Avoid these ingredients		Avoid these foods	
Butter oil	Milk	A2 milk	Infant
Butter fat	protein	Butter	formula –
Casein	Milk	Buttermilk	cow's milk
Caseinates	solids	Cheese	based
Cheese	Non-fat	Condensed	including
powder	dairy	milk	partially
Dairy solids	solids	Cottage	hydrolysed
Hydrolysates	Non-fat	cheese	(HA)
(casein, milk	milk	Cream	formula
protein,	solids	Curds	Low fat milk
whey)	Skim milk	Custard	Malted milk
Lactalbumin	solids	Evaporated	Milk
Lactoglobulin	Whey	milk	Skim milk
Milk		Ghee	Sour cream
derivative		Ice cream	Yoghurt
Take care with <b>coconut milk</b> as some products have cow's milk as an ingredient.			
<b>Exemptions:</b> Alcohol distilled from whey			

More information:

[ASCIA PCC Dietary Avoidance Cows Milk 2020.pdf \(allergy.org.au\)](#)

## Peanut and Peanut Products

Peanuts are legumes, like peas, lentils, pulses and chickpeas, however most people with peanut allergy can tolerate other legumes.

Avoid these ingredients	Avoid these foods	Avoid foods which may contain peanut	
Arachis oil	Mixed	African, Asian	Florentines
Beer nuts	nuts	(e.g. Chinese,	Gravy
Goober nuts	Nutmeat	Indian,	Hummus
Ground nuts	Peanut	Indonesian,	Marzipan
Madelonas	Peanut	Japanese, Thai,	Meat
Monkey	butter	Vietnamese)	dishes e.g.
nuts	Peanut	and Mexican	chilli
Nu-nuts	brittle	dishes	Muesli
Peanut flour	Peanut	Baked goods	bars
Peanut oil	sauce	e.g. biscuits,	Nougat
	Peanut	cakes, pastries	Pesto
	sprouts	Cereals/mueslis,	Sauces
	Satay	Confectionery	Tahini
		e.g. chocolate,	Flavours

More information:

## Seafood

Types of seafood are **fin fish and shellfish**. There are two main categories of shellfish: crustacea and molluscs. The allergen labelling standard currently requires crustacea and 'fish' to be declared. Molluscs are declared currently as 'fish', however, under the PEAL regulations, from Feb 2026, 'fish' will no longer include **Molluscs** and these will be declared separately.

While most people will only be allergic to one type of seafood, there is a high risk of cross-contamination with other seafood depending on how/where it is sold.

## Crustacea

Avoid:	Avoid food which might contain crustacea:	
Barnacles	Fish sauce	Prawn chips
Crab	Fish stock	Scampi fries
Crayfish	Marinara mix	Seafood pizza
Lobster	Marinara pasta	Oyster sauce
Prawns	sauce	
Shrimps	Paella	

## Fish

Avoid Fin Fish and Molluscs		
<b>Fin Fish</b>	Parore	Cockles
Anchovies	Pike	Cuttlefish
Cod	Rays	Kina
Eels	Salmon	Limpets
Flounder	Sardines	Mussels
Haddock	Shark	Octopus
Hake	Snapper	Oysters
Halibut	Sole	Paua
Hapuka	Tarakahi	Periwinkles
Herring	Trout	Pipi
Hoki	Tuna	Scallops
John Dory	Warehou	Sea slugs
Kahawai		Snails
Mackerel	<b>Molluscs</b>	Squid, Squid ink
Moki	Abalone	Toheroa
	Calamari	Tuatua
	Clams	
Avoid food such as:		
Bouillabaisse	Anchovies may be found in Caesar salads & dressing, & Worcestershire sauce	
Caviar	Dips and spreads made with fish or shellfish;	
Crabsticks	Fish sauce may be added in dressings and sauces, especially to Asian dishes;	
Fish chowder (soup)	Fish oils are used as a diet supplement as a single oil capsule, or as part of a combination oil mix. (If you want to take these supplements, discuss this with your allergy specialist).	
Fish paste, fish sauce, fish stocks		
Fruits de mer (seafood)		
Gumbo		
Jambalaya		
Kedgerie (smoked fish)		
Paella		
Roe		
Surimi		
Exemptions:		
Isinglass derived from swim bladders and used as a clarifying agent in beer or wine.		

Under the PEAL regulations, from Feb 2026, 'fish' will no longer include **Molluscs** and these will be declared separately.

## Sesame Seeds and Sesame Seed Products

Avoid these ingredients	Avoid these foods
Benne	Aqua Libra drink
Benniseed	Halvah
Gingelly seeds	Hummus
Gomasio / Sesame salt	Sesame snacks
Sesame	Pastelli
Sesame oil	Sesame oil
Sesame seed	
Sesarmol	Note that breads, buns, breakfast cereals, cakes, Museli bars etc can have sesame seeds on or in them.
Sesomolina	
Sim sim	
Tahina	
Tahini/sesame paste	

## Soybean and Soybean Products

Avoid these ingredients	Avoid these foods	
Bean curd	Edamame	Soy ice cream
Soya bean paste	Miso	Soy milk
Soy flour	Soya beans	Soy sauce
Soy protein isolate	Soy bean sprouts	Soy yoghurt
	Soy cheeses	Tamari
	Soy desserts	Tempeh
	Soy formula	Teriyaki
		Tofu
Exemptions		
Soybean oil that has been degummed, neutralised, bleached and deodorised; or Soybean derivatives that are a tocopherol or a phytosterol.		

## Tree Nuts and Tree Nut Products

Currently 'tree nuts' are not defined in the Food Code for allergen-labelling purposes, other than that 'coconut from the palm *Cocos nucifera*', is exempt. Food allergic reactions to coconut are relatively rare.

Specific tree nut sources therefore may not always be declared on labels.

However, under the PEAL regulations, from Feb 2026, individual tree nuts will need to be declared. They are: almond, Brazil nut, cashew, hazelnut, macadamia, pecan, pine nut, pistachio, walnut.

**Tree Nuts (continued)**

<b>Avoid Tree Nuts</b>	<b>Avoid these foods</b>
Almonds Brazil nuts Cashews Hazelnut/ Filberts Hickory nuts Macadamia nuts Pecans/ mashuga nuts Pine nuts/ Indian nuts Pistachios Walnuts	Beer nuts Carponata (may contain pine nuts) Dukkah Macaroons Marzipan Nougat Nut flavoured alcoholic liqueurs and syrups Nut paste, butter or spreads Pesto Pralines
<b>Avoid these ingredients</b>	Tree nuts are often found in muesli bars, chocolate, breakfast cereals and bakery items. Tree nuts (such as almonds, cashews and walnuts) can be found in a variety of foods and often in foods we do not suspect, including chocolate, cereal or muesli bars, breakfast cereals and bakery items.
Almond paste Almond meal Almond milk Artificial nuts Natural nut extract Non-gai nuts	
<b>Exemption:</b>	<b>Coconut</b> is not regarded as a tree nut and does not require labelling as an allergen.

*Under the PEAL regulations, from Feb 2026, individual tree nuts will need to be declared. They are: almond, Brazil nut, cashew, hazelnut, macadamia, pecan, pine nut, pistachio, walnut.*

**For more information and resources:**

**Allergy New Zealand Inc:** [www.allergy.org.nz](http://www.allergy.org.nz)

**Australasian Society of Clinical Immunology and Allergy (ASCIA) Dietary Sheets:**

[ASCIA Dietary avoidance for food allergy - Australasian Society of Clinical Immunology and Allergy \(ASCIA\)](#)

**Industry Guide to Allergen Management and Labelling for Australia and New Zealand** (Allergen Bureau and AFGC)

[Food Labelling and Allergen Guide April 2021.pdf](#)

**Food Standards Australia New Zealand (FSANZ)**

- The Food Code
- Consumer Information

<http://www.foodstandards.gov.au/>

**Ministry of Primary Industries/NZ Food Safety**

- **Food Allergies**

<https://mpi.govt.nz/food-safety/food-safety-for-consumers/food-allergies/>

- **Food Labelling**

<https://mpi.govt.nz/food-safety/food-safety-for-consumers/food-labelling/>

- **Food Complaints - contact MPI by:**
  - phone on **0800 00 83 33**
  - email to [info@mpi.govt.nz](mailto:info@mpi.govt.nz)

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