

# ALLERGEN LABELLING

## WHAT ARE THE REGULATIONS IN VARIOUS COUNTRIES?

### HIGHLIGHTS

Allergen labelling requirements are different in various countries across Asia. This document summarises whether allergen labelling is mandatory or voluntary in each country, the types of allergens that is required to be declared and how they shall be declared in the respective countries. It should be noted that many Asian countries require mandatory declaration of allergen for food products with some differences in the types of allergens that need to be declared. Besides, it is important to note that the definition of various allergens might be different across countries/markets. It is advised that business shall refer to the country's definition for different allergens while declaring allergens.

## ASIA AT A GLANCE

Regulatory Status	Countries							
Mandatory Status								
	Chinese Taipei	Hong Kong	India	Indonesia	Japan	Laos	Malaysia	Philippines
								
	Singapore	South Korea	Thailand	Vietnam				
Voluntary Status								
	China							
No provision Status								
	Brunei Darussalam	Cambodia	Macau	Sri Lanka				

**Disclaimer:** You may use this report at your own discretion. Every effort has been made to ensure that the information contained in this review is reliable. However, as global regulations often involve legal uncertainties and differences in interpretation, we are therefore not liable whatsoever for any loss or damage resulting from the use of the information contained herein.

**Table 1. Summary of Regulatory Status of Allergen Labelling**

	CODEX	China	Chinese Taipei	Hong Kong	India	Indonesia	Japan	Laos	Malaysia	Philippines	Singapore	South Korea	Thailand	Vietnam
Cereals containing gluten	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Crustacea and their products	X	X	X	X	X	X	X	X		X	X	X	X	X
Eggs and egg products	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Fish and fish products	X	X	X	X	X	X		X	X	X	X	X	X	X
Milk and milk products	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Tree nuts and nuts products	X			X	X	X		X		X	X	X	X	
Sulphite in concentrations of $\geq 10$ mg/kg	X		X	X	X	X		X		X	X	X	X	X
Nuts and nut products		X	X						X			X		X
Peanuts and their products	X	X	X	X	X	X	X	X	X	X	X	X	X	X
Soybeans and their products	X	X	X	X	X	X		X	X	X	X	X	X	X
Mangoes and their products			X											
Sesame and their products			X											
Pork												X		
Peaches												X		
Tomatoes												X		
Chicken												X		
Beef												X		

Voluntary Allergen Labelling	
Align with Codex	

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## CODEX

Based on the General Standard for the Labelling of Prepackaged Foods (GSLPF)<sup>1</sup>, the allergens labelling falls under the mandatory labelling of prepackaged foods. The foods and ingredients shall be declared include

- cereals containing gluten (i.e. wheat, rye, barley, oats, spelt or their hybridised strains and their products);
- crustacea and their products;
- eggs and egg products;
- fish and fish products;
- peanuts, soybeans and their products;
- milk and milk products (including lactose);
- tree nuts and nuts products; and
- sulphite in concentrations of  $\geq 10$  mg/kg.

In addition, the declaration shall be made if the presence of any food/food ingredients obtained through biotechnology of an allergen transferred from any abovementioned products. The Standard also suggests that the food containing the allergen should not be marketed when there is no adequate information on the presence of an allergen through labelling. Small units with less than 10cm<sup>2</sup> may be exempted from the labelling with the exception of spices and herbs.



## BRUNEI DARUSSALAM

No stated requirements.



## CAMBODIA

No stated requirements.



## CHINA

For the time being, it is voluntary to declare allergens in China.<sup>2</sup> However, in May 2020, with amendments proposed to GB 7718 on the General Standard for the Labelling of Pre-packaged foods<sup>3</sup>, allergen labelling has been proposed to be one of the mandatory labelling items.

Currently, the businesses may voluntarily declare the following allergens:

- gluten-containing cereals and related products (such as wheat, rye, barley, oats, spelt or their hybridised strains);
- crustaceans and their products (such as shrimp, lobster, crab);

<sup>1</sup> General Standard for the Labelling of Prepackaged Foods (2018). Retrieved from: <http://www.fao.org/fao-who-codexalimentarius/codex-texts/all-standards/en/>

<sup>2</sup> National Food Safety Standard- General Standard for Labelling of Prepackaged Food GB7718-2011 (2011). Retrieved from: [http://www.cirs-reach.com/Uploads/file/20180428/1524880215\\_81732.pdf](http://www.cirs-reach.com/Uploads/file/20180428/1524880215_81732.pdf)

<sup>3</sup> Proposed Amendments on the National Food Safety Standard on the General Standard for the Labelling of Pre-packaged Foods (May, 2020). Retrieved from: [https://members.wto.org/crnattachments/2020/SPS/CHN/20\\_3143\\_00\\_x.pdf](https://members.wto.org/crnattachments/2020/SPS/CHN/20_3143_00_x.pdf)

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- fish and their products;
- eggs and their products;
- peanuts and their products;
- soybeans and their products;
- milk and dairy products (including lactose); and
- nuts and nut products.

The allergens can be declared via

- Direct declaration in the ingredient list
- Alternatively, the business can choose to display a reminder near to the ingredient list. A reminder can be in the format of "contains..."

If the allergens are not directly added to the food, however, the allergens may be introduced due to the same production line/factory, a statement of "may contain allergens" can be declared near to the ingredient list. The disclaimer can be declared in one of the following formats;

- "May contain ..."
- "May contain trace amounts of ..."
- "This production equipment also processes the food that contains ..."
- "This production line also processes food containing ..."



## CHINESE TAIPEI

It is compulsory to declare allergens in Chinese Taipei.<sup>4</sup> The allergens to be declared include:

- crustaceans and their products;
- mangoes and their products;
- peanuts and their products;
- milk, goat milk and their products (except lactitol derived from milk and goat milk);
- eggs and their products;
- nuts and their products;
- sesame and their products;
- cereals containing gluten and their products (except glucose syrup, maltodextrin and alcohol produced from cereals);
- soybeans and their products (except highly refined or purified soybean oil (fat), tocopherols and their derivation, phytosterols and phytosterol esters);
- fish and their products (except fish gelatine used as carrier for vitamin or carotenoid preparations and fish gelatine used as fining agent in alcohol);
- sulphites ( $\geq 10$  mg/kg of SO<sub>2</sub>)

The allergens can be declared via

- Labelling on the package with the term of "This product contains \_\_\_\_\_", "This product contains \_\_\_\_\_, unsuitable for susceptible individuals", or other synonymous terms
- The product name claims \_\_\_\_\_, label in this way, all the allergic substances of product should be included in the product name.

In addition, a disclaimer is recommended in the case of unintended addition of allergens<sup>5</sup>. For example;

- "Manufactured in equipment that processes [state allergen]" or similar expression

<sup>4</sup> Regulation of Food Allergen Labelling. (2019). Taiwan FDA. Retrieved from: <https://www.fda.gov.tw/ENG/lawContent.aspx?cid=16&id=3113>

<sup>5</sup> Frequently Asked Questions on Food Allergen Labelling (2018). Retrieved from: <https://www.mohw.gov.tw/dl-64172-4f64e2a4-d8df-44d3-acac-ac1e060b1fa2.html>

If the ingredient undergoes high refinement process (degumming, deacidification, decolourisation, deodorization), it may be exempted from allergen labelling. However, the industry should keep relevant information for future reference. Besides, for alcoholic beverages made from cereals are exempted from allergen labelling. Furthermore, the exemption is also applicable to

- Loose foods and catering foods for direct consumption (the business may indicate the information on voluntary basis)
- Products transacted under Business to Business (B2B) mode, however, the relevant information shall be supplied to the clients for future reference



## HONG KONG

It is compulsory to declare allergens in Hong Kong<sup>6</sup>. The allergens to be declared are:

- cereals containing gluten (namely wheat, rye, barley, oats, spelt, their hybridized strains and their products);;
- crustacea and crustacean products;
- eggs and egg products;
- fish and fish products;
- peanuts, soybeans and their products;
- milk and milk products (including lactose);
- tree nuts and nut products<sup>7</sup>;
- sulphites ( $\geq 10$  mg/kg).

There is no tolerance limit for allergens in food to be declared, the allergens should be declared if present in food products. For food safety purpose, if the above food and products are used as ingredients in the products, they are required to be indicated in the list of ingredients if present in the final food products.

The allergens can be declared via

- Direct declaration in the ingredient list. Here are some of the permitted examples provided the guidelines<sup>8</sup>;

"Wheat"; "Rye"; "Flour (cereals containing gluten)"; "Egg"; "Shrimp (Crustacean)"; "Crab meat (Crustacean products)"; "Fish"; "Mackerel (fish)"; "Fish meat"; "Peanuts"; "Soy sauce (contains soybeans)"; "Flavour and flavouring (contains peanut)"; "Milk"; "Whey protein (milk product)";

If the above allergens may be introduced during processing, a statement can be declared near to the ingredient list. The disclaimer should be declared in one of the following formats;

- "May contain traces of (NAME OF ALLERGEN)";
- "Contains traces of (NAME OF ALLERGEN)"; or
- "Produced in a factory where (NAME OF ALLERGEN)" is also handled.

In addition, single ingredient product such as peanut oil is exempted from the labelling of ingredient list under Schedule 4 to the Food and Drugs (Composition and Labelling) Regulations, Cap. 132W. According to the Guidelines, there is no need to declare the allergen in the ingredient list if the name of the single ingredient food has clearly declared the presence of the allergen. The exemption is also applicable for

- Drinks with an alcoholic strength by volume of more than 1.2% but less than 10% as determined under section 53 of the Dutiable Commodities Ordinance (Cap. 109)
- Prepackaged food sold at a catering establishment for immediate consumption

<sup>6</sup> Cap. 132W Food and Drugs (Composition and Labelling) Regulations (2016) Retrieved from: [https://www.elegislation.gov.hk/hk/cap132W?xid=ID\\_1438402696847\\_001](https://www.elegislation.gov.hk/hk/cap132W?xid=ID_1438402696847_001)

<sup>7</sup> "Tree nuts are the seeds of trees which are enclosed in hard shells. Its edible portions are called kernels. The nuts that are most likely causing allergic reactions are almonds, hazelnuts, walnuts, cashew nuts, pine nuts, Brazil nuts, macadamia nuts, and pecans." (2017). Retrieved from: [https://www.cfs.gov.hk/english/faq/faq\\_12.html](https://www.cfs.gov.hk/english/faq/faq_12.html)

<sup>8</sup> Labelling Guidelines on Food Allergens, Food Additives and Date Format (2004). Retrieved from: [https://www.cfs.gov.hk/english/food\\_leg/food\\_leg\\_lgfa.html](https://www.cfs.gov.hk/english/food_leg/food_leg_lgfa.html)

- Individually wrapped confectionery products in a fancy form intended for sale as single items
- Individually wrapped preserved fruits which are not enclosed in any further packaging and which are intended for sale as single items
- Prepackaged food packed in a container the largest surface of which has an area of less than 10 cm<sup>2</sup>
- Fresh fruit and fresh vegetables
- Carbonated water, to which no ingredient other than carbon dioxide has been added and the description of which indicates that it has been carbonated
- Vinegar which is derived by fermentation exclusively from a single basic product and to which no other ingredient has been added
- Cheese, butter, fermented milk and fermented cream, to which no ingredient has been added other than lactic products, and salt needed
- Flavourings
- Wines, liqueur wines, sparkling wines, aromatised wines, fruit wines, sparkling fruit wines and other drinks with an alcoholic strength by volume of 10% or more as determined under section 53 of the Dutiable Commodities Ordinance



## INDIA

In India, allergen labelling is mandatory for processed food products, food served for immediate consumption (include facilities such as hotels, food service vendors or caterers, hospitals, religious gathering, food served in airline/railways/passenger vehicle) as well as food service establishments<sup>9</sup>. This requirement is also applicable for e-commerce food business operators, whereby the e-commerce food business operators shall get information from food business operator and provide the details on website wherever applicable. The allergens to be declared are:

- cereals containing gluten; i.e., wheat, rye, barley, oats, spelt or their hybridized strains and products of these (To be declared as name of the cereal);
- crustacean and their products (To be declared as Crustacean)
- milk and milk products (To be declared as Milk)
- eggs and egg products (To be declared as Egg)
- fish and fish products (To be declared as Fish)
- Peanuts, tree nuts (e.g. almonds, walnuts, pistachio, cashew nuts) and their products (To be declared as Nut)
- soybeans and their products (To be declared as Soy)
- sulphites in concentrations of 10mg/kg or more (To be declared as sulphite)

The allergens shall be declared separately as Contains ..... (Name of allergy causing ingredients). Besides, the product may carry a disclaimer (May Contains..... (Name of allergy causing ingredients) in the case where the presence of ingredients may due to the cross contamination which are known to cause allergy. Last but not least, the raw agricultural commodities are exempted from the allergen labelling requirements.



## INDONESIA

It is compulsory to declare allergens in Indonesia.<sup>10</sup> The allergens to be declared include:

- cereals containing gluten (such as wheat, rye, barley, oats, spelt or hybridised strains);
- egg;

<sup>9</sup> Food Safety and Standards (Labelling and Display) Regulations, 2020. Retrieved from:

[https://www.fssai.gov.in/upload/notifications/2020/12/5fd87c6a0f6adGazette\\_Notification\\_Labelling\\_Display\\_14\\_12\\_2020.pdf](https://www.fssai.gov.in/upload/notifications/2020/12/5fd87c6a0f6adGazette_Notification_Labelling_Display_14_12_2020.pdf)

<sup>10</sup> Label Pangan Olahan. (2018). JDIH BADANPOM. Retrieved from:

[https://standarpangan.pom.go.id/dokumen/peraturan/2018/0\\_PerBPOM\\_31\\_Tahun\\_2018\\_Label\\_Pangan\\_Olahan\\_31\\_Jan\\_2019\\_Join.pdf](https://standarpangan.pom.go.id/dokumen/peraturan/2018/0_PerBPOM_31_Tahun_2018_Label_Pangan_Olahan_31_Jan_2019_Join.pdf)

- fish, crustaceans (prawn, lobster, crab, oyster), molluscs (clams, snails or sea snails);
- peanuts and soybeans;
- milk (including lactose);
- tree nuts (including walnut, almond, hazelnut, pecan, Brazil nut, pistachio, macadamia/Queensland nuts, and cashew);
- sulphites of  $\geq 10$  mg/kg calculated as SO<sub>2</sub> (including sulphur dioxide, sodium bisulphite, sodium metabisulphite, potassium sulphite, calcium bisulphite and potassium bisulphite) for ready-to-eat products.

The allergens can be declared via

- Direct declaration in bold print within the ingredient list and a declaration of separate disclaimer. The disclaimer should be presented in the format of:

"Contains allergens, see ingredients printed in bold"

Processed food manufactured using same facilities as the processed food containing allergens must include information about allergen content. This should be presented near to the ingredient list and in the format of:

- "Produced using the same equipment for processing [state name of food allergen]";
- "It may contain [state allergen]"; or
- "Can contain [state allergen]".

Based on the regulations, the disclaimer for "may contain allergens" can be exempted only if the business is able to guarantee that there are no trace amounts of allergens in the production facilities and this shall be supported with validation document.

Besides, the following highly refined foods are excluded from the provisions of Article 49 of the regulations which require allergens to be declared:

- cereal products containing glucose syrup (including dextrose), maltodextrin, fructose, and sugar alcohol;
- fishery products in the form of gelatine or fish oil;
- soybean products in the form of oil; soybean fat and lecithin; Alpha tocopherol RRR; alpha tocopherol, gamma tocopherol; alpha tocotrienol; 5,7,8-trimethyltolcol; and tocopherol mixture;
- dairy products in the form of lactitol and completely hydrolysed proteins.

In addition, the exemption is also applicable for packaging whereby its surface area less than 10 cm<sup>2</sup>



## JAPAN

It is compulsory to declare allergens in Japan.<sup>11</sup> In Japan, there are two lists for allergens declarations, namely mandatory labelling and recommended labelling.

The mandatory allergens to be declared are:

- shrimp;
- crab;
- wheat;
- buckwheat;
- egg;
- dairy products; and
- peanuts.

<sup>11</sup> Allergen Labelling. Consumer Affairs Agency. (2020) Retrieved from: [https://www.caa.go.jp/en/policy/food\\_labeling/pdf/food\\_labelling\\_cms203\\_200410\\_01.pdf](https://www.caa.go.jp/en/policy/food_labeling/pdf/food_labelling_cms203_200410_01.pdf)



Labelling is also recommended (but not mandatory) for these allergens: almond; abalone; squid; salmon roe; orange; cashew nut; kiwi fruit; beef; walnut; sesame; salmon; mackerel; soybean; chicken; banana; pork; matsutake mushrooms; peach; yam; apples and gelatin.

The allergens can be declared via direct declaration in ingredient list via the following formats

All allergens are required to be individually labelled after the ingredient. For example:

- Ingredients: Potato, carrot, ham (including egg and pork), mayonnaise (including egg and soybean), hydrolysed protein (including beef, salmon, mackerel, and gelatin)/seasoning (amino acid, etc.)

Besides, these allergens may be listed collectively on an exceptional basis. For example:

- Ingredients: Potato, carrot, ham, mayonnaise, hydrolysed protein/seasoning (amino acid, etc.), (including egg, pork, soybean, beef, salmon, mackerel, and gelatin in part)

In addition, the allergen labelling shall be declared for additives if food additives used in food product are derived from allergens. The allergen shall be indicated right after the additive. For example:

- Emulsifier (Soybean origin)

In addition, the use of "may contain" is not permitted on food labels. However, a statement is recommended to be indicated if there is a risk where cross-contamination happens even allergens are not used as ingredients for the products. For example:

- This product is manufactured by the facility using [state allergen] and [state allergen].

Exemption of allergen labelling is given for the following situations<sup>12</sup>:

- Food that contains the specific raw materials from the mandatory allergen labelling list, however, it does not show antigenicity, is exempted from allergen labelling.
- Food additives that contains the specific raw materials from the mandatory allergen labelling list, however, it does not show antigenicity, is exempted from allergen labelling.
- Flavouring agent is exempted from allergen labelling
- Alcohol



## LAOS

It is compulsory to declare allergens in Laos.<sup>13</sup>The allergens to be declared include:

- cereal containing gluten (i.e. wheat, rye, barley, oat, spelt or their hybridised strain and their products);
- crustaceans and their products;
- eggs and egg products;
- fish and fish products;
- peanuts, soybeans and their products;
- milk and milk products (including lactose),
- tree nuts and nut products;
- sulphites in concentrations of  $\geq 10$  mg/kg or more

<sup>12</sup> Notifications and Q&A related to Allergen labelling (2020). Retrieved from:

[https://www.caa.go.jp/policies/policy/food\\_labeling/food\\_labeling\\_act/pdf/food\\_labeling\\_cms101\\_200720\\_01.pdf](https://www.caa.go.jp/policies/policy/food_labeling/food_labeling_act/pdf/food_labeling_cms101_200720_01.pdf)

<sup>13</sup>Regulation on labelling of prepackaged food (2009). Ministry of Health, Laos. Retrieved from:

[https://www.wto.org/english/thewto\\_e/acc\\_e/lao\\_e/WTACCLAO22\\_LEG\\_4.pdf](https://www.wto.org/english/thewto_e/acc_e/lao_e/WTACCLAO22_LEG_4.pdf)





## MACAU

No stated requirements.



## MALAYSIA

It is compulsory to declare allergens in Malaysia.<sup>14</sup> Guidelines for the labelling of food ingredients that may cause hypersensitivity had been issued to provide guidance for food industries, consumers and authorities.<sup>15</sup>

The allergens to be declared include:

- cereal containing gluten (including wheat, rye, barley and oat);
- nut and nut product (including peanut and soybean);
- fish and fish product;
- milk and milk product (including lactose);
- egg and egg product.

Allergens shall be displayed when they are used as food ingredients, compound ingredients, food additives & added nutrients and contamination by other food particles.

For principal food ingredients, the allergen can be marked within the ingredient list. For example:

- Ingredients: "Malt extract (barley)", sugar, skimmed milk powder, cocoa, maltodextrin, palm oil, minerals and vitamins. Contains permitted flavouring substance.

For compound ingredients, the allergen can be indicated within the ingredient list too. For example

- Ingredients: Milk, groundnut oil, "butter (contains milk)", sugar

For food additives, the allergen shall be declared after the additive declaration. For example

- Ingredients: Groundnuts, red onions, sugar, vegetable oil, chicken stock, belacan (contain shrimps), and salt. Contains "permitted flavouring substance (prawn based)" and other flavouring

In addition, a disclaimer is allowed when there is a likelihood of contamination (same equipment used for processing different foods) by other food particles known to cause hypersensitivity. For example

- Ingredients: Rice, carrot, spring onions, chicken. Contains yeast extract as permitted flavouring agent. "May contain fish residues."

The exemption of allergen labelling regulation is applicable for

- Food which the nature, quality, quantity, origin or brand requested by the purchaser, and is weighed, counted or measured in the presence of the purchaser
- Perishable cooked food ready for direct consumption which is packaged on retail premises in response to demand by a purchaser for a specified quantity of such food

<sup>14</sup> Food Regulation 1985. (2020). Ministry of Health. Retrieved from:

<http://fsq.moh.gov.my/v6/xs/dl.php?filename=8d5c76ef4e25e89a74bfe93dda41c2a5.pdf>

<sup>15</sup> Guidelines for the labelling of food ingredients that may cause hypersensitivity (2018). Retrieved from:

<http://fsq.moh.gov.my/v6/xs/dl.php?filename=6fb199c7017c55221ef8dec2aac9462c.pdf>



## PHILIPPINES

It is compulsory to declare allergens in Philippines.<sup>16</sup> The allergens to be declared include:

- cereal containing gluten (i.e. wheat, rye, barley, oat, spelt or their hybridised strain) and their products);
- crustaceans and their products;
- eggs and eggs products;
- fish and fish products;
- peanuts, soybeans and their products;
- milk and milk products (including lactose)
- tree nuts and nut products;
- sulphites ( $\geq 10$  mg/kg)
- Such other ingredient as may be included by FDA through appropriate issuance

A statement may be indicated below the list of ingredients. For example;

- "Contains food allergen: [state allergen]" or similar expression

In addition, a disclaimer is permitted and may be indicated below the list of ingredients. For example;

- "Allergen information: may contain [state allergen]"
- "Manufactured in equipment that processes [state allergen]" or similar expression

Exemptions may be granted for the following products under justifiable circumstances as may be determined by the FDA Director General. Petitions for such exemptions should be submitted to the FDA for appropriate action.

- Food materials to be served for immediate consumption in restaurants/airline catering, or which are not labelled and prepackaged to consumers in schools, cafeterias, trains, airplanes and retail stores
- Bulk food materials (raw materials, ingredients and processed food products) for further processing/repacking/catering or food service use and not intended for retail sale
- Foods in primary packages with label space of  $<10$  cm<sup>2</sup>, provided that the secondary packaging contains all the required labelling information



## SINGAPORE

It is compulsory to declare allergens in Singapore.<sup>17</sup> The allergens to be declared include:

- cereals containing gluten (i.e. wheat, rye, barley, oat, spelt or their hybridised strains) and their products);
- crustaceans and crustacean products;
- eggs and egg products;
- fish and fish products;
- milk and milk products (including lactose);
- peanuts, soybeans and their products;
- tree nuts and nut products;
- sulphites ( $\geq 10$  mg/kg).

<sup>16</sup> Administrative Order No. 2014-0030, Labelling of Prepackaged Food Products. (2014). Department of Health, Philippines. Retrieved from: <https://www2.fda.gov.ph/attachments/article/194724/AO2014-0030%20-%20Revised%20Rules%20and%20Regulation%20Governing%20of%20Prepackaged%20Food%20Product>

<sup>17</sup> Food Regulations. (2020). Singapore Food Agency. Retrieved from: [https://www.sfa.gov.sg/docs/default-source/legislation/sale-of-food-act/food\\_regulations.pdf](https://www.sfa.gov.sg/docs/default-source/legislation/sale-of-food-act/food_regulations.pdf)

Based on the labelling guide<sup>18</sup>, the allergens can be declared via

- Direct declaration within the statement of ingredients.
- Using "Contains" statement immediate after the statement of ingredients.

Based on the labelling guide, all food additives and ingredients used in food products, including those listed as food ingredients and additives causing hypersensitivity shall be declared. The declaration also covers allergens found within the compound ingredients.

In addition, the use of disclaimer "may contain allergens" is not encouraged as this may unnecessarily restrict consumer choice and undermine valid warnings. For business whose products carry the disclaimer of "may contain" may be required to provide justification if any concerns on potential food allergens are raised by consumers.

Under the current regulation, the alcoholic beverages are exempted from declaring statement of ingredients, however, if there is presence of ingredients that may cause hypersensitivity in the alcoholic beverage, the allergen shall be declared on product label.

In addition, to align with international practice, cereals, whey and nuts which are used as distillates for alcoholic beverages, or fish gelatine or isinglass as fining/clarifying agents in beer and wine are not required to be declared on the food label. The exemption is also applicable for

- Food packed in non-retail containers (for further manufacturing process/food services)
- Non-prepacked (loose) foods (food weighed/counted/measured in the presence of the purchaser)
- Foods sold loose in retail outlets (e.g. cold meats/cheeses sold from delicatessen counter, meat sold at butchers)
- Foods which are not sold pre-packed (e.g. meals served in a restaurant and food from takeaway)



## SOUTH KOREA

It is compulsory to declare allergens in South Korea.<sup>19</sup> The allergens to be declared when using food/food additives contain the following as ingredients:

- eggs (limited to poultry);
- milk;
- buckwheat;
- peanuts;
- soybeans;
- wheat;
- mackerel;
- crab;
- shrimp;
- pork;
- peaches;
- tomatoes;
- sulphurous acid (limited to when final product contains  $\geq 10$  mg/kg of SO<sub>2</sub>);
- walnuts;
- chicken;
- beef;
- octopus and shellfish (including oysters, abalone and mussels)

<sup>18</sup> A Guide to Food Labelling and Advertisements (2020). Retrieved from: <https://www.sfa.gov.sg/docs/default-source/food-information/labelling-and-packaging-information/a-guide-to-food-labelling-and-advertisements.pdf>

<sup>19</sup> Food Labelling System (n.d.) Retrieved from [https://www.mfds.go.kr/eng/wpge/m\\_14/de0110051001.do](https://www.mfds.go.kr/eng/wpge/m_14/de0110051001.do)

In addition, the Ministry of Food and Drug Safety (MFDS) also clarifies that the allergens shall be declared regardless of content when

- Product manufactured with ingredients that contain allergens
- Product manufactured with the substances obtained through extraction/other methods from a product having allergenic raw materials

The allergens can be declared via

- Direct declaration within the ingredient list and a declaration of separate disclaimer near the raw material labelling with a different background colour. The disclaimer should be presented in the format of:

“This product contains [state allergen] and [state allergen]”

A disclaimer may be used when there is an unavoidable risk/chance whereby cross-contamination happens when products with allergens and without allergens are manufactured through similar processing line. The disclaimer can be inserted as the following format<sup>20</sup>:

“This product is manufactured in the same production facility as products containing [state allergen]”.

Exemptions are given for certain categories, including

- Agricultural products that are not contained in a container or package
- Agricultural products that are covered with transparent plastic wrap (excluding vacuum package) are exempt from labelling requirement
- Carcasses
- Bulk type livestock products which a label cannot be made
- Foods for further processing/manufacturing for a company's own use in Korea
- Products imported for the purpose of acquisition of foreign currency, under the provisions of Article 26 of the Enforcement Decree to the Foreign Trade Act



## SRI LANKA

No stated requirements.



## THAILAND

It is compulsory to declare allergens in Thailand.<sup>21</sup> The allergens to be declared include:

- cereals containing gluten (i.e. wheat, rye, barley, oat, spelt or their hybridised strains) and their products), excluding wheat based glucose syrups including dextrose, wheat based maltodextrins, glucose syrups based on barley, alcohol distillate from cereals;
- crustaceans (i.e. crab, shrimp, mantis shrimp, lobster and their products)
- eggs and egg products;
- fish and fish products, excluding fish gelatine used as carrier for vitamin or carotenoid preparations;
- peanut and peanut products

<sup>20</sup> Food and Agricultural Import Regulations and Standards USDA GAIN report (2020). Retrieved from: [https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Food%20and%20Agricultural%20Import%20Regulations%20and%20Standards%20Country%20Report\\_Seoul\\_Korea%20-%20Republic%20of\\_12-31-2019](https://apps.fas.usda.gov/newgainapi/api/Report/DownloadReportByFileName?fileName=Food%20and%20Agricultural%20Import%20Regulations%20and%20Standards%20Country%20Report_Seoul_Korea%20-%20Republic%20of_12-31-2019)

<sup>21</sup> Notification of the Ministry of Public Health (No. 367) B.E. 2557 (2014) Retrieved from: [http://food.fda.moph.go.th/law/data/announ\\_moph/V.English/No.367-\(383\).pdf](http://food.fda.moph.go.th/law/data/announ_moph/V.English/No.367-(383).pdf)

- soybean and soybean products, excluding fully refined soybean oil and fat, natural mixed tocopherols (INS06), natural D-alpha-tocopherol, natural DL-alpha-tocopherol, natural D-alpha-tocopheryl acetate, natural DL-alpha-tocopheryl acetate, natural D-alpha-tocopheryl acid succinate from soybean sources, vegetable oils derived phytosterols and phytosterol esters from soybean sources, plant stanol ester produced from vegetable oil sterols from soybean sources
- milk and milk products (including lactose), excluding lactitol from milk and milk products
- tree nuts and their products (i.e. almond, walnut, pecan, etc;)
- sulphites ( $\geq 10$  mg/kg).

The allergens can be declared via

- A disclaimer declaration "Information for food allergy: contain...".
- Alternatively, the information for allergen may be displayed as "contain..." in a frame. Colour of letter shall be contrast with background colour of the frame and the colour frame shall be contrast with background colour of the label too.

Moreover, a disclaimer of "may contain allergens" is permitted in the case where food may be contaminated in the process. The disclaimer can be displayed in the following formats;

- A disclaimer declaration "Information for food allergy: may contain...".
- Alternatively, the information for allergen may be displayed as "may contain..." in a frame. Colour of letter shall be contrast with background colour of the frame and the colour frame shall be contrast with background colour of the label too.

Food which containing allergens as main ingredients which the allergens have been clearly specified on the product name is exempted from allergen labelling (i.e. fresh cow's milk, baked peanuts). Besides, the exemption is also applicable to

- Food which producers can provide to consumer at that time such as food hawkers, food stalls
- Food which did not pass through any processing or fresh food which are peels, removed, eviscerated, trimmed, or any other means to reduce size, either may be cooled or not and packed in containers which are able to see condition of food in the containers.
- Prepackaged food produced and sold in food shops, restaurants, hotels, schools, academic institutes, hospitals or any other same kinds of these and also including food delivery services



## VIETNAM

It is compulsory to declare allergens in Vietnam.<sup>22,23</sup> The allergens to be declared include

- cereals and food containing gluten (i.e. wheat, rye, barley, oats, spelt or their hybrid strains) and their products;
- crustaceans and their products;
- egg and egg products;
- fishery and fishery products;
- peanut, soy and their products;
- milk and milk products (including lactose, sugar, milk);
- nut and nut products;
- sulphites (sulphuric salt and acid) in concentrations of  $\geq 10$  mg/kg.

<sup>22</sup> Labelling Guidelines Revised for Pre-Packaged Food and Additives. (2015) USDA GAIN Report. Retrieved from: [https://gain.fas.usda.gov/Recent%20GAIN%20Publications/Labelling%20Guidelines%20Revised%20for%20Pre-Packaged%20Food%20and%20Additives%20Hanoi\\_Vietnam\\_1-20-2015.pdf](https://gain.fas.usda.gov/Recent%20GAIN%20Publications/Labelling%20Guidelines%20Revised%20for%20Pre-Packaged%20Food%20and%20Additives%20Hanoi_Vietnam_1-20-2015.pdf)

<sup>23</sup> Joint Circular 34/2014/TTLT-BYT-BNNPTNT-BCT Guiding the Goods Label for Various Foods, Food Additives, and Aids for Processing Packaged Foods (2014). Retrieved from: <http://vbpl.vn/TW/Pages/vbpg-toanvan.aspx?ItemID=65791&Keyword=34/2014>

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