

How must an allergen be declared?

Certain substances must be declared on labels when present in food whenever they are used as an ingredient; part of a compound ingredient; a food additive or component of a food additive; or a processing aid or component of a processing aid, as per section 1.2.3–4.

This document is designed to assist you in determining how a mandatory allergen statement must appear in relation to your product. To determine whether your product is required to have an allergen declaration at all, refer to our compliance step “*Does my product require an allergen declaration?*”. For formatting requirements and examples of allergen declarations, please see our Further Explanatory Material document “*Plain English Allergen Labelling*”.

This document also contains the table to Schedule 9, which lists the required names for an allergen declaration.

	How must allergens be declared?	Law Location
1.	<p>Does the food contain any ingredient which may trigger an allergen declaration?</p> <p><i>Refer to Compliance Steps document - “Does my product require an allergen declaration?”</i></p>	<p>If yes, proceed to Question 2.</p> <p>If no, then no allergen declaration is required.</p>
2.	<p>Is the product a food for special medical purposes (FSMP)?</p> <p><i>(See Standard 2.9.5)</i></p>	<p>If yes, an allergen declaration must be made in accordance with Section 1.2.3–6(5). The name of each allergen must be stated on the product label either by:</p> <ul style="list-style-type: none"> – Stating the required name of the allergen listed in Column 1 of the table to section S9–3; or – Stating any other name by which the allergen is commonly known. <p>If no, proceed to Question 3.</p>
3.	<p>Is the product an infant formula product for special dietary use (IFPSDU) – being a product which is:</p> <ul style="list-style-type: none"> - specifically formulated for premature or low birthweight infants; - specifically formulated to satisfy particular metabolic, immunological, renal, hepatic or malabsorptive conditions; - represented as lactose free formula or low lactose formula; or - based on a protein substitute? <p><i>(See Standard 2.9.1)</i></p>	<p>If yes, the name of each allergen must be stated on the product label either by:</p> <ul style="list-style-type: none"> – Stating the required name of the allergen listed in Column 1 of the table to section S9–3; or – Stating any other name by which the allergen is commonly known. <p>These are the only products where the allergen can be declared using any word other than the required name in Schedule 9. This is because these products are supplied under medical supervision.</p> <p>There is no mandatory obligation to declare the allergens in a particular location (e.g. in ingredients list and summary statement) or to comply with prescribed formatting requirements (e.g. font). However, this can be done voluntarily. If choosing to voluntarily do so, go to Question 7.</p> <p>If no, proceed to Question 4.</p>

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4.	<p>Is the product any of the following?</p> <ul style="list-style-type: none"> - Food not required to bear a label (Section 1.2.1-9); - Individual portion packs (Section 1.2.1-6(3)); - Foods sold to caterers (Section 1.2.1-15); or - Food sold via wholesale (Section 1.2.1-20). 	<p>If yes, the required name of the allergen as listed in Column 4 of the table in Schedule 9 must be used whenever allergens are referred to. <i>For example, food which is not required to bear a label under Section 1.2.1-9) must declare the allergen using the required name in Column 4 in information displayed in connection with the food and in information provided to the purchaser upon request (as per Section 1.2.1-9(6) and (7)).</i></p> <p>For these foods, there is no mandatory obligation to declare the allergens in a particular location (e.g. in ingredients list and summary statement) or to comply with prescribed formatting requirements (e.g. font).</p>
5.	<p>Is the food not required to bear an ingredients list?</p> <ul style="list-style-type: none"> - The label lists the name of the food and a statement of ingredients would <u>only</u> list that food; or - It is water that is packaged and labelled in accordance with Standard 2.6.2; or - It is a standardised alcoholic beverage; or - It is a food for sale contained in a small package. <p>A “small package” is a package with a surface area of less than 100 cm².</p> <p>(See Section 1.2.4-2)</p>	<p>If yes, the required name of the allergen must be declared somewhere on the label (as per Schedule 9) even though an ingredients list is not required.</p> <p>There is no mandatory obligation to declare the allergens in a particular location (e.g. in ingredients list and summary statement) or to comply with prescribed formatting requirements (e.g. font). However, this can be done voluntarily. If choosing to voluntarily do so, go to Question 7.</p> <p>If no, proceed to Question 6.</p>
6.	<p>Is the food any of the following?</p> <ul style="list-style-type: none"> - Foods required to bear a label (Section 1.2.1-6(1)) - Infant formula products (except infant formula products for special dietary use (IFPSDU)) (Section 2.9.1) - Food for infants (Section 2.9.2) - Formulated meal replacements & formulated supplementary foods (Section 2.9.3) - Formulated supplementary sports foods (Section 2.9.4) 	<p>If yes,</p> <ul style="list-style-type: none"> - The required name (as per Schedule 9) of the allergen must be listed in the statement of ingredients; and - If the allergen is a substance used as a processing aid or is an ingredient or component of such a substance, then the words ‘processing aid’ must be stated in conjunction with the required name in the statement of ingredients; and - A summary statement must be included on the label of the food for sale. <p>Formatting requirements apply. Go to Question 7.</p> <p>If no, your product may not be classified as a food. In this scenario, a detailed risk assessment is encouraged.</p>

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7.	What are the prescribed font requirements for the ingredients list?	<p>The following requirements apply:</p> <ul style="list-style-type: none"> - The allergen must be in bold font (in contrast with other text in the ingredients list). - It is not required to be capitalized. - The first letter of required name of the allergen can be upper or lower case. - Bolding of other ingredients which may be associated with intolerances (e.g. mustard) is not permitted. However, this can be distinguished in some other way (e.g. using italics, capitalization or a different colour). - Bolding of non-allergen information is permitted (e.g. advisory statements such as contains quinine) only if allergens declared distinctly contrast with the other text in the ingredients list. <p>Go to Question 8.</p>
8.	What are the prescribed size requirements for the ingredients list?	<p>The name of the allergen must be no smaller than any other text in the ingredients list.</p> <p>Go to Question 9.</p>
9.	What are the prescribed colour requirements for the ingredients list?	<p>The name of the allergen can be in any colour so long as it is legible.</p> <p>Go to Question 10.</p>
10.	What are the prescribed location requirements for the ingredients list?	<p>The following requirements apply:</p> <ul style="list-style-type: none"> - Separately for each ingredient containing the allergen - Separately but next to ingredient containing the allergen, unless the required name is identical to/contained within the name of the ingredient - Separate word (even if the name of the allergen is in the name of the ingredient) <p>E.g. Whey Powder (Milk), Lactose Powder (Milk), Buttermilk (Milk), Oatmeal (Oats), Milk Powder, Processing aids (wheat, egg), Pine Nuts.</p> <p>Go to Question 11.</p>

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11.	Is the ingredients list permitted to contain any additional text beyond the required name of the allergen?	<p>As stated above, the allergen must be declared using the required name (as per Column 3 of table to Schedule 9).</p> <p>Additional text is permitted (e.g. Organic Milk or species names of fish) so long as the required name still appears in the ingredients list.</p> <p>Go to Question 12.</p>
12.	Is the ingredients list permitted to declare an allergen in plural format?	<p>The allergen declaration in the ingredients list can be in either singular or plural, so long as the required name (as per Column 3 of table to Schedule 9) is used.</p> <p>Go to Question 13.</p>
13.	What are the prescribed font requirements for the summary statement?	<p>The following requirements apply:</p> <ul style="list-style-type: none"> - The summary statement must be in the same font and typeface as any required name in ingredients list. - The allergen must be in bold font (in contrast with other text in the ingredients list). - The first letter of required name can be upper or lower case. - Bolding of non-allergen information is permitted (e.g. advisory statements such as contains quinine) only if separate from the summary statement and where the summary statement continues to distinctly contrasts with the background and other text on the label. <p>Go to Question 14.</p>
14.	What are the prescribed size requirements for the summary statement?	<p>The summary statement must be the same size as any required name in ingredients list.</p> <p>Go to Question 15.</p>
15.	What are the prescribed colour requirements for the summary statement?	<p>The summary statement can be in any colour so long as it is legible.</p> <p>Go to Question 16.</p>

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16.	What are the prescribed location requirements for the summary statement?	<p>The following requirements apply:</p> <ul style="list-style-type: none"> - The summary statement must be distinctly separated from the ingredients list. - The summary statement must appear in the same field of view and directly next to the ingredients list (can be underneath, above or on the side of the ingredients list) <p>For example:</p> <p>INGREDIENTS: Tomato, Basil, Almonds, Milk Solids, Cheese (Milk).</p> <p>Contains Almonds, Milk.</p> <p>Go to Question 17.</p>
17.	Is the summary statement permitted to contain any additional text beyond the required name of the allergen?	<p>The summary statement is not permitted to contain any additional text beyond the word “contains” and the mandatory required names (as required under Schedule 9).</p> <p>This means the word “and” may not be permitted before the last allergen declared in the summary statement.</p> <p>Go to Question 18.</p>
18.	Is the summary statement permitted to declare an allergen in plural format?	<p>The summary statement can declare allergens in either singular or plural format</p>

See: Table to Section S9-3 of Schedule 9 below.

TABLE TO SECTION S9—3 OF SCHEDULE 9

The table to section S9—3 is replicated below:

Item	Column 1	Column 2	Column 3	Column 4
	<i>Food</i>	<i>Exemption</i>	<i>Required name for declarations in a statement of ingredients</i>	<i>Required name for other declarations</i>
1	added sulphites in concentrations of 10 mg/kg or more		sulphites	sulphites
2	Any of the following cereals (including hybridised strains thereof) if they contain gluten:	the cereal or its hybridised strain that is present in beer or spirits		
	barley		barley	gluten
	oats		oats	gluten
	rye		rye	gluten
3	wheat (including its hybridised strain) irrespective of whether it contains gluten	<p>(a) the wheat or its hybridised strain that is present in beer or spirits;</p> <p>(b) glucose syrups made from wheat starch and that:</p> <p>(i) have been subject to a refining process that has removed gluten protein content to the lowest level that is reasonably achievable; and</p> <p>(ii) have a gluten protein content that does not exceed 20 mg/kg;</p> <p>(c) alcohol distilled from wheat.</p>	wheat	<p>(a) wheat; and</p> <p>(b) if gluten is present - gluten.</p>

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	<i>Food</i>	<i>Exemption</i>	<i>Required name for declarations in a statement of ingredients</i>	<i>Required name for other declarations</i>
4	Any of the following tree nuts:			
	almond		almond	almond
	Brazil nut		Brazil nut	Brazil nut
	cashew		cashew	cashew
	hazelnut		hazelnut	hazelnut
	macadamia		macadamia	macadamia
	pecan		pecan	pecan
	pine nut		pine nut	pine nut
	pistachio		pistachio	pistachio
	walnut		walnut	walnut
5	crustacea		crustacean	crustacean
6	egg		egg	egg
7	fish	isinglass derived from fish swim bladders and used as a clarifying agent in beer or wine	fish	fish
8	lupin		lupin	lupin
9	milk	alcohol distilled from whey	milk	milk
10	mollusc		mollusc	mollusc
11	peanut		peanut	peanut
12	sesame seed		sesame	sesame
13	soybean	(a) soybean oil that has been degummed, neutralised, bleached and deodorised; (b) soybean derivatives that are tocopherol or phytosterol.	soy, soya or soybean	soy