



A guide to allergen labelling - **Knowing what's in your food and how to label it**

This guide covers the rules for declaring food allergens in the food and drinks you make, import and/or sell.

Why do I need to declare food allergens?

People with a food allergy or food intolerance need to know what is in their food, so they can decide if it is safe for them to eat it.

Everyone that makes and sells food has a responsibility to give consumers the information they need to make safe choices. To enable consumers to make safe choices, it is mandatory to declare the presence of common allergens in an ingredients list and a contains statement. The ingredients list will include all of the ingredients and the associated allergens and the contains statement is a summary highlighting the allergens present in the food.

This guide will help you understand what the rules are and what it means for your business.

Rules for labelling allergens

Allergen labelling rules assist in making it easier for consumers to identify what allergens are in food and to help them make safe choices.

Product labelling under previous allergen labelling rules

Any food packaged and labelled before **25 February 2024** under the previous allergen labelling rules may be sold for a further 2 years (**25 February 2026**).

Here's a summary of what to do under the allergen rules:



Use required allergen names



List allergens in bold font



Use individual nut names of the 9 specified tree nuts



Use 'fish' or 'mollusc' or 'crustacean' as appropriate



Use mandatory contains statement



List 'wheat' as a separate allergen to 'gluten'

Contents

Useful information

Why allergens matter **page 3**

Allergen labelling rules

What are the allergen labelling rules? **page 4**

Allergens that must be declared page 4

Overview of the allergen labelling rules page 5

Where do you declare allergens? pages 6 – 7

Allergen words pages 8 – 9

Useful information

Extra information **page 10**

Useful links **page 11**

Checklists for your products to meet the allergen labelling rules **pages 12 – 13**

Why allergens matter

Dangers of allergens

People with food allergies can have a reaction that could be life threatening within minutes of eating the wrong food for them.

It is important to maintain the integrity of allergen free foods by preparing, cooking, displaying and handling them separately from food with allergens. People with a food allergy or a food intolerance need accurate information about what's in their food, so they can decide if it's safe for them.



Some food contains unexpected allergens

Ingredients you use may contain allergens you don't expect, so it's important to read the label or specification sheet so you know what's in them. If full allergen information is not provided at the time of purchase or delivery, you should confirm the presence of any allergens that may be in the product with the supplier.

Importers must know about the allergen labelling rules in New Zealand. They must get accurate and reliable ingredient information from their overseas suppliers about the foods they import. This is so they can ensure it is labelled correctly and they can pass the information on to their customers.

Here are some examples of foods that may have hidden allergens:



Sulphites



Soy
Gluten
Wheat



Fish



Sulphites



Soy
Wheat
Gluten



Pine nuts
Cashews
Peanuts
Milk



Fish



Egg
Gluten
Wheat



Soy



Sulphites
Milk
Egg



Gluten
Wheat
Soy

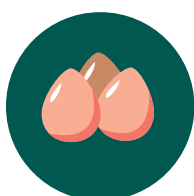


Egg

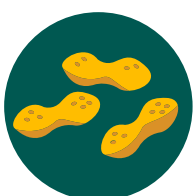
See the Unexpected Allergens Document here: allergenbureau.net/wp-content/uploads/2022/08/UNEXPECTED_ALLERGENS_IN_FOOD_GUIDE_Aug_2022_F1.pdf

Allergens that must be declared

Here are the food allergens you need to inform your customers about and must know about in New Zealand:



Egg



Peanuts



Milk*



Soy



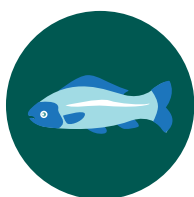
Sesame



Lupin

Gluten
(barley, oats, rye, wheat**)

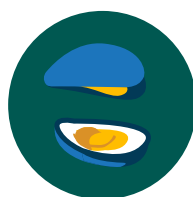
Wheat**



Fish



Crustacean



Molluscs



Sulphites***



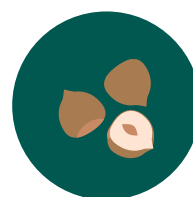
Almonds



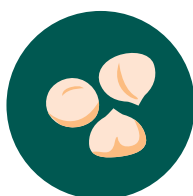
Brazil nuts



Cashews



Hazelnuts



Macadamias



Pecans



Pine nuts



Pistachios



Walnuts

*includes milk from cows, deer, goats, sheep, buffalo
 **triticale and spelt must be declared as wheat and gluten
 ***added sulphites – level 10 mg/kg or more

Other allergens

There are some other allergens that may need to be declared. These are: Royal jelly, Bee Pollen and Propolis. See [page 10](#) for the special rules about how these must be declared.

Overview of the allergen labelling rules

REQUIRED ALLERGEN NAMES

Here is how to phrase the allergen in the ingredients list compared to the contains statement. You can use the singular or plural form.

INGREDIENTS LIST	CONTAINS STATEMENT & OTHER DECLARATIONS
barley	gluten
oats	gluten
rye	gluten
wheat	wheat, gluten
almonds	almonds
Brazil nuts	Brazil nuts
cashews	cashews
hazelnuts	hazelnuts
macadamias	macadamias
pecans	pecans
pine nuts	pine nuts
pistachios	pistachios
walnuts	walnuts
crustacean	crustacean
mollusc	mollusc
egg	egg
fish	fish
lupin	lupin
milk	milk
peanuts	peanuts
sesame	sesame
soy, soya or soybean	soy
sulphites*	sulphites*

*added sulphites – level 10 mg/kg or more

All allergens (except added sulphites less than 10 mg/kg) must be declared no matter how little is in the food you make or sell. There are some exemptions to this. See page 10 for more detail.

If an allergen is an ingredient, part of a compound ingredient, a food additive, or is used as a processing aid, you must put this on your label.

A compound ingredient is an ingredient made up from two or more ingredients e.g. cheese as the compound ingredient in a cheese scone.

In an ingredients list and contains statement, allergens must be written in **bold**. For further formatting requirements, see page 7.

If you use a processing aid that is an allergen source, the allergen should be declared in the ingredients list, e.g. processing aid (**egg**), and in the contains statement e.g. **Contains egg**.

Some generic names are no longer allowed to be listed in the ingredients list, e.g. nuts.

The contains statement must start with the word 'Contains' and then list the allergens. It should have no other words. See [page 7](#) for more detail.

Where do you declare allergens?

Where you declare your allergens depends on what type of label your product is required to have.

Products that need a label but no ingredients list

Some products have a label but don't need an ingredients list. These are:

- packaged water,
- standardised alcoholic beverages**,
- food in a package with less than 100 cm² total surface area,
- individual packs sold in a multi-pack (not intended for individual sale),
- food sold to caterers/food service businesses for use as an ingredient e.g. restaurants,
- single ingredient foods (e.g. milk),
- food supplied to food manufacturers or processors who process it further***.

While no ingredients list is required, if any allergens are present, the required allergen name* must be used on the label, but no "contains statement" or specific formatting (e.g. bold text) need to be used.

** beer, cider, fruit wine, fruit wine product, liqueur, mead, perry, spirit, vegetable wine, vegetable wine product, wine, wine product.

*** this product does not require allergen information on the label but this must be provided in writing on request.

Allergens must be:

On the label (using the required allergen name*)	✓
In bold font	optional
In the same font and size as in the ingredients list	not required
In a specific place	not required



This product is sold to caterers/food service businesses so it does not require an ingredients list, but any allergens must be declared on the label.

Products not requiring a label

Some products don't need a label, for example:

- food sold in cafes for immediate consumption,
- delivered pizza,
- pick and mix lollies in a shop.

You need to declare allergens using the required allergen name* (e.g. provided to customers who ask).

Note: Businesses may choose to include allergen information on their menus (not mandatory).

For more information visit: www.mpi.govt.nz/food-business/labelling-composition-food-drinks/documents/

*The required names for the allergens can be found in the table on [page 5](#).

Allergens must be:

Declared (using required allergen name*)	✓
In bold font	not required
In the same font and size as in the ingredients list	not required
In a specific place	not required

Products with a label and an ingredients list

Food labels that need an ingredients list must have allergens declared within the ingredients list and in a contains statement.

Ingredients list

This is where you list all of the ingredients in your food. You need to:

- list your ingredients in descending order,
- list any food additives you've used,
- list any 'processing aid' from an allergen source if used,
- include the allergens using their required allergen name* in bold, with font no smaller than the rest of your ingredients.

Allergens in the ingredients list must be:

Written using required allergen name*	✓
Repeated for each ingredient that contains that allergen	✓
In bold font	✓
In a font no smaller than the rest of the ingredients list.	✓

Wording specifics for the ingredients list

When declaring allergens you can either:

- 1 **bold** the part of the ingredient that mentions the allergen. For example:
 - **egg** whites,
 - **milk**,
 - **wheat** flour, or
- 2 after the ingredient, write the allergen in brackets in a **bold** font. For example:
 - cream (**milk**),
 - spelt (**wheat**),
 - Processing aid (**egg**) or Processing aid containing **egg**,
 - Whey powder (**milk**) or Whey powder (from **milk**) or Whey powder (made from **milk**).

Some ingredients may seem like they have the allergen in their name such as Oatmeal and Buttermilk, but you can't bold part of a word. The correct way to write them, for example, is Buttermilk (**milk**), and Oatmeal (**oats**).

Contains statement

- The contains statement must be distinctly separate but next to (or above or below) the ingredients list.
- It must start with the word 'Contains' and only list the allergens using their required allergen name* and no other words,
- The whole contains statement must be in **bold**, in the same font and size as the required allergen name in the ingredients list.

Allergens in the contains statement must be:

Written using the required allergen name*	✓
In bold font	✓
In the same font and size as the required allergen name in the ingredients list	✓
Using no other words (e.g. 'and', 'processing aid')	✓
The contains statement must be separate from but next to the ingredients list.	✓

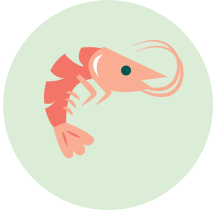
This product is for retail sale so requires an ingredients list and a contains statement.

*The required names for the allergens can be found in the table on [page 5](#).



Allergen words

What to use under the rules:



You need to use the words 'mollusc' or 'crustacean' or 'fish' to describe the allergen that is present.

Some examples of mollusc are:

- clams
- cockles
- cuttlefish
- kina
- mussels
- octopus
- oysters
- periwinkles
- pipi
- paua
- sea snails
- scallops
- squid
- tuatua

Some examples of crustacean are:

- crab
- crayfish
- lobster
- scampi
- shrimp (crevette)
- prawns

Note: Molluscs refer to marine molluscs only, land molluscs (e.g. snails) do not need to be declared



You need to declare the specific nut used.

The nuts you must declare:

- almond
- Brazil nut
- cashew
- hazelnut
- macadamia
- pecan
- pine nut
- pistachio
- walnut

Other nuts:

Only these listed nuts need to be identified as allergens. If you are using another type of nut, (e.g chestnuts), it must be declared in the ingredients list, but shouldn't be in bold.

Peanuts are not a tree nut, they are a legume and need to be declared separately.



The following applies for gluten declaration:

If a food contains **barley, oats or rye** (or their hybrids) and contains gluten, then the required name of the cereal grain must be declared in the ingredients list and 'gluten' in the contains statement.

If the food contains **wheat**, you need to declare 'wheat' in the ingredients list and contains statement. If gluten is present in the wheat, you must include 'wheat' and 'gluten' in the contains statement.



For dairy products, you must use 'milk' to declare the presence of the allergen.

Examples of labels showing allergen wording:

Here are some examples of ingredients lists with contains statements showing wording and bolding:



Ingredients:

water, potato, corn, hoki (5%) (**fish**), shrimp (4%) (**crustacean**), cream (**milk**), onion, mussels (2%) (**mollusc**), celery, corn starch, salt, olive oil, parsley, sugar, garlic, black pepper, lemon juice, chilli powder

Contains: fish, crustacean, milk, mollusc



Ingredients:

Peanuts, dark chocolate (sugar, cocoa mass, cocoa butter, **milk** fat, emulsifier (**soy** lecithin), natural flavour), glucose syrup, chicory fibre, corn maltodextrin, sunflower oil, glycerine, natural flavour, salt, emulsifier (**soy** lecithin), sugar syrup, **almonds pecans**

Contains: peanuts, milk, soy, almonds, pecans



Ingredients: **Wheat** flour, Sugar, Vegetable oil, Salt, **Eggs**, Condensed **milk**, Baking Powder, Emulsifier (**soy** lecithin), Flavour, Colours (102, 110), Antioxidant (307b)

Contains Wheat, Gluten, Eggs, Milk, Soy

Extra Information

Ingredients exempt from allergen labelling

Some ingredients are exempt from allergy labelling rules. These ingredients have been assessed as safe because they are manufactured in a way that makes them suitable for people with allergies:

- glucose syrups made from wheat starch (subject to gluten max limit 20 mg/kg),
- fully refined soy oil,
- soy derivatives (tocopherols and phytosterols),
- distilled alcohol from wheat or whey,
- gluten/wheat in beer or spirits,
- isinglass (fish) used in beer or wine.

'May Contain' statements

Some food labels use 'may contain' or 'may be present' statements about certain allergens, such as 'may contain peanuts'. These are voluntary statements made by food businesses that are not regulated by the allergen rules covered in this guidance.

We do not recommend blanket 'may contain' statements, if these statements are used on labels we suggest that they are only used when the allergen management plan put in place by the food business identifies a risk.

Compound ingredients

When declaring a compound ingredient in your ingredients list, the allergen in the name of the compound ingredient is not required to be bolded. It is the individual ingredients that contain allergens that are required to be bolded. For example the ingredient egg fettuccine, when used in a prepared meal, would be declared as:

Ingredients: Egg Fettuccine (Durum **Wheat** Semolina, **Egg**)
Contains: **Egg, Gluten, Wheat.**

Processing aids

Processing aids are used to perform a technical function during the manufacturing of food (e.g. clarifying agent, anti-stick agent) but not in the final food. They are not required to be included in the ingredients list unless they contain an allergen. The specific name of a processing aid is not required. Food businesses should confirm if their suppliers have used any processing aids that may be a source of allergens that must be declared.

Other allergens

There are some other allergens that you may need to declare on your products. The table beside outlines the foods/ingredients that need to be declared and the type of statement required:

Allergen	Statement	Wording for statement	Specifications
Royal jelly or food containing royal jelly	Warning statement	This product contains royal jelly which has been reported to cause severe allergic reactions and in rare cases, fatalities, especially in asthma and allergy sufferers.	You must use these exact words and they must be 3 mm or bigger (or > 1.5 mm for small packages).
Bee pollen or a food containing bee pollen	Advisory statement	You can choose the words to use but you must indicate the product contains bee pollen which can cause severe allergic reactions.	No exact specifications.
Propolis or a food containing propolis	Advisory statement	You can choose the words to use but you must indicate that the product contains propolis which can cause severe allergic reactions.	No exact specifications.

Useful links

Food labelling guides

Different labelling rules apply depending on who your food is sold to. New Zealand Food Safety has published guidance for labelling foods to sold to these customers:

- **A Guide to Retail Food Labelling**
www.mpi.govt.nz/dmsdocument/2965-A-guide-to-food-labelling
- **A Guide to Labelling Food Sold to Caterers/ Food Service Businesses**
www.mpi.govt.nz/dmsdocument/45112-A-Guide-to-Labelling-Food-Sold-to-CaterersFood-Service-Businesses
- **A Guide to Labelling Food Supplied to a Food Manufacturer or Processor**
www.mpi.govt.nz/dmsdocument/45109-A-Guide-to-Labelling-Food-Supplied-to-a-Food-Manufacturer-or-Processor

Specific product labelling guides

Guidance for labelling specific foods:

- **Honey:**
www.mpi.govt.nz/dmsdocument/26491-a-guide-to-new-zealand-honey-labelling
- **Alcoholic Drinks:**
www.mpi.govt.nz/dmsdocument/31404-a-guide-to-alcoholic-drinks-whats-in-them-and-how-to-label
- **Labelling Food Containing Hemp Seeds:**
www.mpi.govt.nz/dmsdocument/31608-A-Guide-to-Labelling-Food-Containing-Hemp-Seeds

Useful websites

- **Allergen declarations, warnings, and advisory statements on food labels:**
www.mpi.govt.nz/food-business/labelling-composition-food-drinks/allergen-declarations-warnings-and-advisory-statements-on-food-labels
- **Allergen Bureau**
allergenbureau.net
- **Allergen bureau - Unexpected Allergens in Food**
allergenbureau.net/wp-content/uploads/2022/08/UNEXPECTED_ALLERGENS_IN_FOOD_GUIDE_Aug_2022_F1.pdf
- **Food allergen portal**
www.foodstandards.govt.nz/consumer/foodallergies/food-allergen-portal
- **Food Standards Code - Plain English Allergen Labelling**
Standard 1.2.3: www.legislation.gov.au/Series/F2015L00397
Schedule 9 www.legislation.gov.au/Series/F2015L00479
Standard 1.2.1: www.legislation.gov.au/Series/F2015L00386
Standard 1.2.4: www.legislation.gov.au/Details/F2021C00290
- **CODEX Code of Practice on Food Allergen Management for Food Business Operators**
www.fao.org/fao-who-codexalimentarius/sh-proxy/en/?lnk=1&url=https%253A%252F%252Fworkspace.fao.org%252Fsites%252Fcodex%252Fstandards%252FCXC%2B80-2020%252FCXC_080e.pdf

If you still need help, we recommend you contact a food labelling consultant to help write your label.

www.mpi.govt.nz/food-business/starting-a-food-business/hiring-a-food-consultant/

For questions about food rules and food safety, visit www.mpi.govt.nz/food-business,

email: info@mpi.govt.nz or call 0800 00 83 33.

Checklists for allergen labelling rules

Use these checklists to help you get your allergen labelling right.

Use checklist A for:

- for products that do not require an ingredients list on their label,
- for products not requiring a label.

Use checklist B for:

- for products that require an ingredients list on their label.

Checklist A: For products that do not require an ingredients list on their label & products not requiring a label

Complete one checklist per product

I have identified:	Completed	Comments If the item is not applicable for your product write N/A in the comments box
<ul style="list-style-type: none"> • all of the inputs (ingredients, food additives and processing aids) used to make my food 		
<ul style="list-style-type: none"> • the allergens present in each of the above inputs 		
I have declared the allergens by:		
<ul style="list-style-type: none"> • using the required allergen names 		
I have declared the allergens:		
<ul style="list-style-type: none"> • on the product label 		
<ul style="list-style-type: none"> • on the label of individual packs sold in a multi-pack (not intended for individual sale) 		
<ul style="list-style-type: none"> • in a separate document to be supplied with the product 		
<ul style="list-style-type: none"> • in the information available for consumers on request 		
<ul style="list-style-type: none"> • other (please specify): 		

Checklist B: For products with a label and an ingredients list

Complete one checklist per product

I have identified:	Tick once complete	Comments If the item is not applicable for your product write N/A in the comments box
<ul style="list-style-type: none"> all of the inputs (ingredients, food additives and processing aids) used to make my food 		
<ul style="list-style-type: none"> the allergens present in each of the above inputs 		
I have declared the allergens in the ingredients list on the label by:		
<ul style="list-style-type: none"> using the required allergen names 		
<ul style="list-style-type: none"> listing them as separate words (e.g buttermilk (milk)) 		
<ul style="list-style-type: none"> putting the allergens in brackets (if needed) 		
<ul style="list-style-type: none"> making sure that the allergens are in bold font, no smaller than the rest of the text in the ingredients list 		
<ul style="list-style-type: none"> declaring the term 'processing aid' in association with the allergens it contains (if applicable) 		
I have declared the allergens in a Contains statement on the label:		
<ul style="list-style-type: none"> starting with the word 'Contains' 		
<ul style="list-style-type: none"> using the required allergen names and no other words 		
<ul style="list-style-type: none"> making sure that the Contains statement is in bold font, in the same font and size as in the ingredients list 		
<ul style="list-style-type: none"> placed the Contains statement next to the ingredients list on my label 		

Food businesses that use the Simply Safe & Suitable Template Food Control Plan can use their "Allergens in your food" record blank with this checklist for each product. The record blank can be found here: www.mpi.govt.nz/dmsdocument/16717-Food-service-and-food-retail-food-business-record-blanks