

### 2.1.3 Questions for submitters

1. Are the current requirements to declare fish and fish products in Standard 1.2.3 clear on what foods/ingredients must be captured by the declaration?

- No. It does not mention about molluscs and declaration of them specifically. It only refers to fish and crustacea
- Molluscs are in a different botanical family to fish i.e. finfish, and crustacea, and do not fit into the definitions of fish and shellfish according to the Macquarie Dictionary
- As both finfish and crustacea require declaration, so should a mollusc
- Molluscs should be subject to the same labelling declarations as finfish and shellfish
- The current standards 1.2.3 and 1.2.4 do not give sufficient guidance to manufacturers and importers of foods for consumers to be confident of their labelling
- The proteins in finfish, crustacean, molluscs and echinoderms are all potential allergens
- To help clarify the what is meant by 'fish', the Standard 1.2.3 and Standard 2.2.3 – Fish and Fish Products clause 2.2.3-2 need amending to define what is meant by the term fish, crustacea and mollusc, and give examples of each.  
Explanations such as those given on p5 of this W1070 paper would be very helpful to show which group the different aquatic species fit into.
- In a 'Contains' statement the term 'finfish' is more appropriate instead of fish, to clarify and identify that it is a finfish ingredient

If not, please explain the problems associated with declaring these foods and ingredients on food labels.

If 'fish' is used to describe a mollusc ingredient:

- There is no way of knowing a mollusc is present. They may assume the product is safe for them to eat, which can have dangerous and potentially fatal consequences
- It can lead to unnecessary confusion, stress, fear, avoidance and restriction of foods, as it is not known if 'fish' refers to a finfish or a mollusc ingredient. Unnecessary food avoidance will affect all the family members of the mollusc-allergic child or adult

2. Do food manufacturers understand that the allergen declaration requirement for fish and fish products includes finfish, crustacea and molluscs?

- Labels seen declared both fish and crustacea when they were ingredients. When there was also a 'Contains' statement both the fish & crustacea was listed
- On imported brands of oyster sauce seen oyster was declared as an ingredient and on the label as Oyster sauce. There were not any Fish sauce labels seen that had oyster only as the seafood ingredient.
- Some Fish sauce labels had both fish(anchovies) and oyster declared as ingredients

3. Is the term 'fish' being used to refer to molluscs and/or crustacea in a 'contains' statement (even if a mollusc or crustacean ingredient is specifically declared in the ingredient list)?

- Yes, on one soup label fish was declared in the Allergen Advice but mussels were not. Both fish and mussels were listed as ingredients  
e.g. Signature Range Creamy Seafood Chowder. Label 28)  
Ingredients: Water, Seafood (Fish 9%), Green Lipped Mussels (1.5%), Cream, White Wine, Thickener 1442, Carrots, Skim Milk Powder,, Onions, Wheat Flour, Salt, Garlic, Lemon Juice Concentrate, Pepper, Natural Colour 160a, Dill.  
Allergen Advice: Contains Gluten, Milk, Fish

### 2.2.3

#### 4. Are manufacturers regularly declaring 'gluten containing cereals' in a 'contains' statement, with the specific cereal/s declared in the ingredient list?

- Yes, some manufacturers do this. See example of cereal labels 23), 33), 34)

Is this information helpful for consumers with a cereal-specific allergy, or does it create difficulties for them in making correct food choices?

- A 'gluten containing cereals' label is not helpful for a cereal allergic person
- Gluten is a protein found in wheat, spelt, barley and rye and their hybrids, but not in oats. A cereal allergy is usually to one cereal only, with other cereals tolerated. These other cereals tolerated can also contain gluten.
- Using a 'gluten containing cereals' labelling only can result in an unnecessary avoidance and thus unnecessary food restriction of other cereals and foods the cereal-allergic person can tolerate. E.g. with a cereal allergy to wheat only can tolerate rye, thus can eat the rye crackers that have a "gluten containing cereal" label on them.
- 'Contains gluten' labelling can be confusing for wheat allergic people who may not know that non-wheat containing cereals are suitable for a wheat allergic person
- The difficulty is that a label declaration is trying to meet the needs of both the people with coeliac disease for gluten terminology, and for cereal allergic people needing a specific cereal named  
Gluten is used as a common term readily and easily identified that covers the different types of cereals and ingredients to avoid for a person with coeliac disease. It is of relevance to those with coeliac disease only.  
The cereal allergic person needs the specific cereal named in the Ingredient list and also in the 'Contains' statement, so it is easily identifiable
- Individuals can react to other cereals such as rice and barley/corn, as seen in infants  
FPIES - Food Protein Induced Enterocolitis and Eosinophilic Oesophagitis (EO)

It is not a mandatory requirement to use the words /declare "cereals containing gluten". What is mandatory is the declaration of specifically "wheat, rye, barley, oats and spelt and their hybridised strains".

Reference: Warning and Advisory Statements and Declarations User Guide to Standard 1.2.3 - Mandatory Warning and Advisory Statements and Declarations 5.8 Additional labelling requirements set out in Standard 1.2.4 – Labelling of Ingredients p15)

We recommend that the statement "gluten containing cereals" **not** be used on labels. Gluten is only found in wheat, spelt, barley and rye and their hybrids. Gluten is not found in oats unless through contamination with wheat, barley or rye. Oats only need to be avoided by avenin-sensitive people with coeliac disease.

Labelling that declares "gluten free" to indicate wheat, barley, rye and barley ingredients that have been tested to contain < 20 mg/kg gluten (as per CODEX Alimentarius – standard 118) and uncontaminated oats should be used.

#### 5. Are there instances where food labels omit the mandatory declaration for 'cereals containing gluten' because the cereal ingredients happen to contain no detectable gluten?

This question is confusing. "Cereals containing gluten" as a statement is not a mandatory declaration as per FSANZ regulation but one developed by the AFGC.

- Most manufacturers correctly identify wheat, rye, barley, oats and spelt and their hybridised strains in an ingredient list
- Some add the AFGC statement 'cereals containing gluten' in a 'Contains' statement. They do not in all cases appear to understand that refined cereals may contain < 20 mg/kg gluten and therefore be suitable for people with coeliac disease and labelled gluten free.
- Use of the words "gluten free" e.g. to identify a wheat dextrose ingredient with < 20 mg/kg gluten would be helpful

### Unclear cereal declarations

Some labels declared the presence of wheat etc., in a 'Contains' statement, although no wheat, spelt, barley, rye or oat is listed in the ingredients.

e.g. this sauce label declared the presence of wheat and soy in a 'Contains' statement but there are not any wheat containing ingredients listed or identified with a wheat in brackets beside it.

e.g. [REDACTED] Ready Sauce for Lemon Chicken. Label 31)

Water, White Sugar, Corn Syrup Powder, Concentrated Lemon Juice 12%, Salted plum (Plum, Salt), Rice Vinegar, Modified Corn Starch, Salt, Acid 330, Natural Flavouring, Acidity Regulator 531, Stabilizer, 415, Tumeric powder  
Contains Wheat, Soybeans

### No cereal declaration or 'Contains' statement

The milkshake mix has no indication of the cereal sources of the maltodextrin or malt extract. Indicates absence of soy by listing lecithin from sunflower.

This product may be gluten free but the label gives no assistance to consumers.

e.g. [REDACTED] (milkshake mix)

Ingredients: sugar, cocoa 15% (sunflower lecithin), maltodextrin popping candy, malt extract, flavour, salt.

### 6. Are there instances where manufacturers are declaring the presence of 'gluten' (not 'gluten-containing cereals') along with a declaration of the specific cereal elsewhere on the label?

Yes, some manufacturers use variations in the wording to declare gluten in a 'Contains' statement, along with naming the specific cereal in the ingredient list such as:

- 'gluten containing ingredients' Label 36)
- Contains gluten (oats, wheat, barley) Label 38)
- Contains gluten and tree nuts (almonds, hazelnuts, cashews)  
- lists the cereals individually in the ingredient list Label 39)
- Also name the cereal in brackets after the gluten declaration,  
Contains: Gluten (Oats, wheat, barley) Label 34)  
- this is in addition to the cereal name in the ingredient list

If so, then can you comment on why this labelling practice is occurring, and whether it is/is not useful information for consumers with a cereal allergy?

- Possible reasons- the word 'gluten' or 2 words 'Contains gluten' are shorter than 'cereals containing gluten' and take up less space on a label  
- the words 'Gluten (oats, wheat)' has the specific information in a minimum of words
- As for the answer to Q4) a 'Contains gluten' statement only without naming the specific cereals beside it is not useful for the cereal allergic consumer, and also not useful for a person with coeliac disease who can eat oats. They still need to read the Ingredient list to see what the specific cereals are and if they are ones they can tolerate or need to avoid.
- The useful and relevant information for a cereal allergic person is to have the specific cereal listed in a 'Contains' statement at the end. Ingredient lists can be very long to read through and an ingredient /allergen in a list of up to 37 ingredients can be missed in the busy, noisy and stressful supermarket shopping environment
- The specific cereal ingredient named in the 'Contains' statement at the end is an accurate and obvious word to see and identify

### **Recommendations:**

- That all cereals require a mandatory declaration in the ingredient list when present in a food, not just 'cereals which contain gluten'
- Name the specific cereal in the ingredient list and in the 'Contains' statement
- The words 'cereals containing gluten' are not used on a label
- The word gluten would be best restricted to use in 'gluten free' statements only

7. Are you aware of food products that declare the name of a cereal on their labels but also declare that they are 'gluten free'? Would such information be unclear to consumers with a cereal-specific allergy, and if so, how?

- Yes, a lot of gluten free products declare the name of the cereal on the label and declare gluten free under the ingredient list, on the front or side of the packet
- Naming the specific cereal is very useful and clear for the cereal allergic consumer
- Some consumers do not know what gluten free means and this may confuse them
- Wheat free diet information sheets will often explain what is meant by gluten free to help consumers understand the different terms and which foods are suitable e.g. ASCIA Dietary avoidance – wheat allergy
- The labelling with 'gluten free' does not help consumers allergic to rice, corn and other cereals that do not contain gluten
- Consumers allergic to rice, corn and other non-gluten containing cereals need to read a label each time as rice and corn are often used in gluten-free products

8. Do food manufacturers understand which tree nuts must be declared on food labels as a means of meeting the tree nut declaration requirements in Standard 1.2.3?

- Yes, manufacturers declared the specific nut in the ingredient list of labels seen for cereals
- However there was variation in how tree nuts were declared in a 'Contains' list which is a source of confusion

9. Which tree nuts are clinically significant for individuals with a tree nut allergy?

- Individuals can react to a wide range of tree nuts
- Some tree nut allergic people can eat and tolerate one or more tree nuts, but react to other tree nuts
- Some tree nut allergic people are advised to avoid all tree nuts
- Testing for tree nuts by a blood test (RAST) and skin prick test is available in New Zealand for almond, brazil, cashew, hazelnut, macadamia, pecan, pistachio, walnut and coconut
- For other tree nuts a skin test with a fresh tree nut solution can be used if that fresh tree nut is available
- It would assist manufacturers to have additional information on tree nuts about alternative names, unusual tree nut names, other tree nuts not commonly seen in New Zealand but may be listed in foods from other countries  
ASCIA Dietary Avoidance – tree nut allergy diet sheet lists a number of the other tree nuts, e.g. beer nuts, non-gai nuts, pecan/ mashua nuts  
Macadamia nut can also be called a Queensland nut

A table with the Common name of the tree nut and a second column for the Alternative names as below could be a useful format

Food Allergen Common name	Alternate names
Peanut	Ground nut, Beer nuts, Arachis, Goobers Monkey nuts

Has there been any clinical evidence since 2010 to further clarify the types of tree nuts implicated in tree nut allergies in Australia and New Zealand?

No.

10. Are manufacturers declaring the presence of tree nuts using the broader term 'tree nuts' in addition to the declaration of the specific tree nuts elsewhere on the label (e.g. a 'contains tree nuts/nuts' statement, with the specific nuts listed in the ingredient list)?

- Yes, some manufacturers are listing the broader term 'tree nuts' in a 'Contains' statement under the ingredient list, as well as listing the specific nut in the ingredient list

There are other variations in how the specific tree nuts are listed in the ingredient list and the words 'tree nuts' or 'nuts' used elsewhere

- Listed a generic name of Nuts in the ingredient list followed by a bracket with the specific name of the tree nut, one in combination with seeds

e.g. [REDACTED] Light Berry Cereal. Label 37)

Ingredients Cereals (52%) (Corn, Buckwheat, Rice), Dried Fruit (17%)(Sultanas, Humectant (Glycerol)), Currants, Dried sweetened Cranberries (Sugar, Cranberries, Sunflower Oil)), Nuts and Seeds (12%) (Almonds, Sunflower Seeds, Linseeds, Pumpkin Seeds), Brown Sugar, Sugar, Rice Bran

Oil, Blackcurrant Juice Concentrate (1%), Golden Syrup, Glucose (Preservative(223)), Emulsifier (471), Salt, Natural Flavour, Vitamins (Vitamin E, Niacin, Thiamin, Riboflavin, Folate), Mineral (Iron)

"Contains tree nuts and added sulphites. No gluten containing ingredients are intentionally used in this recipe. While [REDACTED] takes great care during processing, this product is produced in an environment which also produces gluten and wheat containing cereals"

- Tree nuts specified in the Contains statement as well as in the ingredient list

e.g. [REDACTED] Muesli 5 Grains and Hazelnut Label 39)

Ingredients: Wholegrains (87%) (oats, triticale, barley, wheat, wheat flakes (wheat, sugar, inulin, barley malt extract, salt, emulsifier (471), vitamins (niacin, thiamine, riboflavin, folic acid), mineral (iron), buckwheat), brown sugar, pumpkin seeds, almonds (1.4%), hazelnuts (1.4%), sunflower seeds, cashews, (1.2%), linseeds, sugar, flavour (natural vanilla)

Contains gluten and tree nuts (almonds, hazelnuts, cashews)

May be present: peanuts, soy, and other tree nuts

- 'Nuts' and the specific tree nuts named in the ingredient list, with the specific tree nuts named in the 'Contains' statement

e.g. [REDACTED] Toasted Power Muesli (Bold as appears on label) Label 37)

Ingredients Cereals (wholegrain rolled oats, wholegrain **wheat**) sugar, nuts 4.8% (**cashews, almonds**), seeds 2.3% (sunflower, pumpkin), canola oil, honey, flavour, caramelized sugar syrup, **barley** malt extract, salt, emulsifier (471)

**Contains gluten (oats, wheat, barley), cashews and almonds**

**May be present: peanuts, soy and other tree nuts**

Would such an arrangement on a food label assist or hinder tree nut-sensitive consumers in making a correct food choice?

- The words 'tree nuts' only in the 'Contains' statement hinders tree-nut allergic or sensitive consumers in making the correct choice as the specific tree nut is not mentioned there. The consumer then has to look at the ingredient list for the name of the specific tree nut, with up to 38 names/words in some cereal ingredient lists.
- For the consumer who can tolerate some tree nuts but not others, mistakes can be made and a specific tree nut missed in the long list of ingredients in the busy/noisy shopping environment
- It is thus accurate and safer for the tree nut-allergic or sensitive consumer to have the specific tree nut declared in the ingredient list and in the Contains statement
- The words 'tree nuts', 'nuts' are not necessary when the specific nut is listed in the 'Contains' statement
- 'Nuts' is also a confusing and unhelpful word as it is unclear whether tree nuts or peanuts are being referred to. The words peanuts or the specific tree nut name should be used instead

**Recommendations:**

- That the specific tree nut is declared in the ingredient list and in the Contains statement
- The words 'tree nuts' or 'nuts' should not be used.

11. Is the use of unfamiliar or unrecognisable terminology for allergen declarations common practice, and/or creating difficulties with the identification of allergens in foods?

We would appreciate any evidence or examples of such labelling practices.

- Use of unfamiliar or recognisable terminology for allergen declarations does not appear to be common, however only a small number of labels were looked at
- A more unfamiliar / less frequently used name for milk Whey powder was the 19<sup>th</sup> of 36 ingredients listed on the Watties individual packet soup label, which may not be recognized by some milk allergic consumers. See Label 27)  
There was no allergen statement about 'Contains milk' at the end of the ingredient list and the whey powder was not in bold to signify an allergen  
This could make it easier for the milk allergic person to not recognize, or to miss the name of a milk product in the long list of very small print ingredients  
Fortunately the word 'skim milk' was the first ingredient, which hopefully would be recognized and seen by the milk allergic consumer and prevent purchase/use
- Other significant difficulties with identifying allergens on the packet label are:
  - the number of ingredients that have to be read in the ingredient list
  - if the allergen(s) are not in bold in the ingredient list
  - if there is not a 'Contains' statement
  - the 'Contains' statement is not in bold
  - a small / very small font size.

12. Do 'contains' statements assist with identifying the presence of an allergen especially in the context of less familiar or less recognisable terminology being used in allergen declarations?

- Yes, a 'Contains' statement is essential to help identify the presence of an allergen when ingredient/allergen names are unfamiliar and not recognizable by the consumer
- A consumer cannot be expected to know and remember all the alternative names for egg, milk, soy, wheat, peanut and/or the individual tree nuts  
e.g. whey powder is one of 33 names in a list of foods and ingredients that contain cows milk protein and should be avoided on the ASCIA dietary avoidance - Cow's milk allergy diet sheet
- A 'Contains' statement is very important to enable the consumer to accurately identify the presence of an allergen where there a number of ingredients and compound ingredients in brackets, a long list of ingredients and where a smaller type-font is used
- The simple name /common term / generic name of an allergen in the 'Contains' list also assists identification of an allergen when the more technical ingredient name is used in the ingredient list. e.g. the term milk is listed in the Contains statement milk when sodium caseinate is listed as the ingredient
- A 'Contains' statement provides the most direct and accurate way to identify presence of multiple food allergens in a food. This is important for children and adults with two or more food allergies where the parent/caregiver/ food allergic adult has to read and look out for 2, 3 or 4 different allergens and all the variations in names there may be.
- The 'Contains' statement is also an important alert to the presence of an allergen where it may not be an expected ingredient e.g. egg white in the Allen's Kool Mints and Kool Fruits sweets. Label 42),43)

**Recommendations:**

- A 'Contains' statement should be included on all food packet labels which have an ingredient list.
- A 'Contains' statement should be in bold
- A 'Contains' statement should name the allergen in a simple and recognizable word  
e.g. egg, finfish or specific name, crustacea or specific name, mollusc or specific name, milk, wheat, soy, barley, rye, rice, corn, peanut, specific name of tree nut
- In the ingredient list the ingredient containing the allergen should also be in bold to assist identification of that allergen ingredient



## Additional Issues

Putting a 'Contains' statement on the label when the allergens were not an ingredient in the product was confusing on the Signature Range Potato Chips packet label, Label 24).

e.g. Signature Range Crinkle Cut Ready Salted Potato Chips  
Ingredients: potatoes, vegetable oil  
May contain traces of peanuts and other nuts.  
Contains peanuts and other nuts as indicated in bold type  
Gluten, honey, milk and soy also handled on this site

This is a confusing label as it has 2 different statements about peanuts and tree nuts with the 'May contain traces of' and a 'Contains peanuts and other nuts as indicated in bold type'

The 'Contains peanuts and tree nuts as indicated in bold type' is not needed as they are both not an ingredient in the product.

The company is perhaps trying to use the same packaging for different products that do have peanut and tree nuts as an ingredient, and not have another one printed for those that do not have peanuts/tree nuts in.

## Precautionary Labelling Statements

There is currently a wide variation in the types of precautionary allergen labelling statements used by manufacturers, which can cause concern and confusion for the food-allergic consumer, parents and caregivers, and health professionals.

This was reviewed in the In the FSANZ Dec 2010 document *W3 - Review of the Regulatory Management of Food Allergens* (the W3 Review) (FSANZ 2010) p14-20.

Summary of precautionary allergen labelling statement wording variations found on labels in the Packet Label Reference List attached.

<b>Precautionary Allergen Label Statements</b>	<b>Label Reference Number</b>
<b>May be present / may contain</b>	
May be present: milk, soy beans, sesame seeds and tree nuts	3)
May contain traces of egg, peanut, tree nut and sesame	10)
May contain traces of tree nuts and peanuts	13)
May contain traces of peanuts and/or tree nuts	33)
May be present milk, sesame. Because we use cheese and sesame on some of our other products so we can't guarantee that traces couldn't be found on this product	21)
May be present crustacea, fish, eggs and milk	25)
May contain other gluten containing ingredients and sulphites	367
<b>Allergen heading</b>	
Allergen Advice: may contain gluten, milk, peanuts, soy and tree nuts	23)
<b>Production Line / Factory type statements</b>	
Produced in a factory handling milk products, soy bean products, sesame seeds, peanuts and other nuts	11)
Produced in a factory handling cereals containing gluten, milk products, peanuts, other nuts and soy	22)
Made on a line that also produces products that contain sesame	17)
Made on equipment that also processes celery, crustacea, fish, milk and mustard	26)

Gluten, honey, milk and soy also handled on this site	24)
No gluten containing ingredients are intentionally used in this recipe. While VOGEL'S takes great care during processing, this product is produced in an environment which also produces gluten and wheat containing cereals	33)
Breads containing sesame, soy and eggs are made in the Vogel bakery	20)
Because we use cheese and sesame on some of our other products so we can't guarantee that traces couldn't be found on this product	21)

#### Precautionary Labelling Statements Issues include-

##### *Produced in a factory handling statements-*

Vagueness, uncertainty about the possibility and risk of an allergen being present

There is no information a consumer can use to evaluate possible risk and safety of the product in a shopping situation

What does it mean?

What are the ingredient room practices for handling ingredients to prevent /decrease cross contamination?

Do all foods go down the same production line & so traces or larger amounts may be present?

Are different production lines used?

What cleaning practices are used in-between food products to prevent /decrease cross contamination?

##### *Production line statements - Made on a line /equipment that also produces....*

Ambiguity, uncertainty about the possibility and risk of an allergen being present.

Do all foods go down the same production line & so traces or larger amounts may be present?

Are different production lines used?

What cleaning practices are used in-between food products to prevent /decrease cross contamination

Or do they mean, is it another way of declaring an allergen 'May be present', Traces may be present'?

##### *May be present / May contain:*

Indicates there is a possibility the allergen may be present.

These are a simple and direct statement which can assist the consumer in making a decision about the presence of an allergen and safety of the product for them.

These could be used instead of the factory and production line statements to help with consistency and clarity of information for the consumer

The precautionary statement "may be present" is to be used only in conjunction with VITAL. in 3.2.4 Food Industry Initiatives p15) FSANZ Dec 2010 document W3 - Review of the Regulatory Management of Food Allergens (the W3 Review) (FSANZ 2010)

There have been some recent studies reported which are important and relevant to the Precautionary allergen labelling issues.

1) The detectable allergen content was measured in a range of 3 Australian supermarket foods with precautionary allergen statements.

*Foods with precautionary allergen labeling in Australia rarely contain detectable allergen*

GA Zurzolo, JJ Koplin, SL Taylor, KJ Allen et al, J Allergy & Clin Immunol: In Practice July/August 2013



2) *The knowledge, practice, and views on precautionary allergen labelling for the management of patients with IgE-mediated food allergy – a survey of Australasian and UK health professionals*  
PJ Turner, KJ Allen, S Mehr, DE Campbell J Allergy & Clin Immunol Pract: Clinical Communications. Article in Press

As FSANZ is undertaking this review into Allergen labelling, it is clear there is a need to also review the precautionary allergen labelling statements situation further.

Use of the VITAL programme, analysis and criteria is important to assist manufacturers with labelling.

We welcome the opportunity to make a submission on Plain English Allergen Labelling, and look forward to hearing the outcome of FSANZ ongoing work into this area.

Reference:

ASCIA Diet sheets

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

Patients & Consumers/ Food Allergy / ASCIA Diet sheets / ASCIA Dietary avoidance for 9 of the most common food allergens

ASCIA PCC Dietary Avoidance general information 2014

ASCIA PCC Dietary Avoidance - cow's milk 2015 / cow's milk egg / cow's milk egg soy / egg / peanut / peanut tree nut / sesame / soy / tree nut 2014 / wheat allergy 2014

## **SUBMISSION to Food Standards Australia New Zealand (FSANZ) Consultation Paper - W1070 Plain English Allergen Labelling**

### **Packet Label Reference List of Allergen Labelling Information 2015**

#### **Background:**

##### **Presence of allergens**

Listed in the ingredient list: as the specific ingredient; often in bold type; allergen in brackets beside the ingredient, e.g. wheat (gluten) xxx (milk)

**Separate heading** under the ingredient list as to the type of allergen: egg, milk/ milk products, peanuts, tree nuts, soy/ soy products, wheat, gluten, sesame seed.

Heading as: Allergen Advice; Allergens; Contains; Any allergies?

##### **“May contain” wording variation**

Separate heading and list, under the ingredient list and any Allergen heading

Words such as: May be present: May contain... May contain traces of....

Production line/ factory processing line statements

**Labelling on some packet products from Auckland and Nelson Countdown and New World supermarkets in December 2015.**

#### **Biscuits, Crackers**

- 1) [REDACTED], Superwine biscuits  
Produced in a factory handling egg products, sesame seeds, peanuts and other nuts
- 2) [REDACTED] Cookie Bear biscuits  
Produced in a factory handling tree nuts and sesame seeds
- 3) [REDACTED] Malt Biscuits  
May be present: milk, soy beans, sesame seeds and tree nuts
- 4) [REDACTED] Cream Crackers  
Produced in a factory handling sesame seeds, peanuts and other nuts  
Most other Huntley & Palmer cracker packets say tree nuts instead of words other nuts
- 5) [REDACTED] crackers, biscuits  
May contain traces of.....
- 6) [REDACTED] Brown Rice Crackers  
May be present gluten, milk, soybeans
- 7) [REDACTED] Shapes Bacon  
May contain traces of egg, nut and sesame
- 8) [REDACTED] Shapes BBQ  
May contain traces of egg, milk, nut and sesame
- 9) [REDACTED] Shapes Cheddar  
May contain traces of egg, nut and sesame
- 10) [REDACTED] Shapes Chicken Drumstick  
May contain traces of egg, peanut, tree nut and sesame
- 11) [REDACTED] Cravers BBQ, Chicken

Produced in a factory handling milk products, soy bean products, sesame seeds, peanuts and other nuts

- 12) [REDACTED] Original Cheese Sticks *14 ingredient names*  
Ingredients: Wheat flour, grated cheese, (38%) (cheese, milk, salt, rennet, culture), anticaking agent (460), butter (from milk), baking powder (raising agents (500, 541), salt, spices  
This product is made on equipment used to manufacture product containing eggs & nuts.

Comment: does not have a 'Contains' label at the end under the ingredient list. Allergens are listed in the ingredient list but not indicated in bold.

Allergens are more difficult to identify on this label and require reading of 26 ingredients in small print on the label.

- 13) [REDACTED] Choc-topped tree mini Gingerbread 25 g *18 ingredient names*  
Ingredients: Gingerbread (wheat flour, golden syrup (water, sugar), butter (cream), brown sugar, spices, egg, salt, raising agent(500)). White compound chocolate (23%) (sugar, vegetable fat, milk solids, stabilizer (492), emulsifier (322) vanillin).  
Contains: Gluten, egg, milk, soy  
May contain traces of tree nuts and peanuts

Comment: has a Contains statement so allergens easily identifiable. This important as the allergens are not in bold in the ingredient list

- 14) [REDACTED] Christmas Biscotti *35 ingredient names*  
Ingredients: Wheat flour, Imitation cherries, (sugar, water, vegetable gum (401), food acid, (330), flavour, preservative (211), mineral salt (450), colour (122, 124, 102, 133), Almonds, Sugar, Eggs, Brazil Nuts, Dried Apricots, Compound Chocolate (sugar, vegetable oil, cocoa powder, milk solids, emulsifiers (soya lecithin, 492), salt, flavour), Hazelnuts, Mixed peel (Mixed peel, glucose, sugar, food acid, (330), preservative (202, 220,) Raisins, Baking Soda (500), Flavour, Salt.  
**Contains wheat, egg, milk, soy, hazelnut, brazil nut and almond products**

- 15) [REDACTED] Toffee Pops *22 ingredient names*  
**Ingredients:** Sugar, Wheat Flour, Vegetable Fats (Antioxidant (307b:Soy), Glucose Syrup, Condensed Milk (Milk, Sugar), Milk Solids, Cocoa butter, Cocoa mass, Golden Syrup, Invert Syrup, Butter, Emulsifiers (Soy Lecithin, 476, 471,470), Salt, Cornflour, Raising Agents (450, Baking Soda) Natural Flavour.  
**Contains: Wheat (Gluten), Milk Products and Soybean Products**  
**Produced in Factory handling Peanuts, Tree Nuts and Sesame Seeds**  
**Contains: 36% Milk Chocolate and 32% Toffee**

## Breads

- 16) [REDACTED] Wholemeal and Seed  
May be present soy and milk
- 17) [REDACTED] Fresh White and Toast, Molenberg & Freya  
Made on a line that also produces products that contain sesame
- 18) [REDACTED] English Split Muffins  
May contain milk and sesame
- 19) [REDACTED] Muffin Splits  
Made on a line that processes products containing milk and sesame
- 20) [REDACTED] Mixed Grain Toast  
Breads containing sesame, soy and eggs are made in the Vogel bakery

### **Bagel Crisps, Corn Chips, Potato chips**

- 21) [REDACTED] Bagel Crisps, Sea Salt, Contains wheat, barley.  
May be present milk, sesame  
Because we use cheese and sesame on some of our other products so we can't guarantee that traces couldn't be found on this product
- 22) [REDACTED] Spuds Ripple Cut Ready Salted Chips 150g packet  
Ingredients: potatoes, vegetable oil, salt  
Produced in a factory handling cereals containing gluten, milk products, peanuts, other nuts and soy
- 23) [REDACTED] Corn Chips  
Ingredients: corn, vegetable oil, salt  
Allergen Advice: may contain gluten, milk, peanuts, soy and tree nuts
- 24) [REDACTED] Crinkle Cut Ready Salted Potato Chips  
Ingredients: potatoes, vegetable oil  
May contain traces of peanuts and other nuts  
Contains peanuts and other nuts as indicated in bold type  
Gluten, honey, milk and soy also handled on this site

Comment: this is a confusing label as it has 2 different statements about peanuts and tree nuts with the 'May contain traces of' and a 'Contains peanuts and other nuts as indicated in bold type'

The 'contains peanuts and tree nuts as indicated in bold type' is not needed as they are both not an ingredient in the product.

The company is perhaps trying to use the same packaging for different products that do have peanut and tree nuts as an ingredient, and not have a another one printed for those that don't have peanuts/tree nuts in.

### **Instant Noodles**

- 25) [REDACTED] Oriental Flavoured Noodle Cup  
Allergen Advice: contains gluten soybean  
May be present crustacea, fish, eggs and milk
- 26) [REDACTED] Oriental Noodles  
Contains soy and wheat  
Made on equipment that also processes celery, crustacea, fish, milk and mustard

### **Soups**

- 27) [REDACTED] Soup Thai Chicken 70g Individual serve packet *36 ingredient names*

Good example of specific labeling different forms of fish, shrimp, milk products, e.g.-  
Skim milk, Coconut cream 16% (Coconut milk, Stabiliser (415 from wheat) Milk Protein),  
Green Curry Paste (2.5%) (Contains Shrimp, Flavours) Whey powder, Fish sauce (Contains Anchovies) Stabiliser (415 from Soy)

Comment: Allergens are clearly listed but not in bold, which would have been helpful in this long list of ingredients in very small font on a packet 17cm long and 4.5cm wide.

No other allergen or traces labeling statements

- 28) [REDACTED] Creamy Seafood Chowder Ingredients: Water, Seafood (Fish 9%), Green Lipped Mussels (1.5%), Cream, White Wine, Thickener 1442, Carrots, Skim Milk Powder,, Onions, Wheat Flour, salt, garlic, lemon Juice Concentrate, pepper, Natural Colour 160a, Dill.  
Allergen Advice: Contains Gluten, Milk, Fish

## Sauces

- 29) [REDACTED] Ready Sauce for Coconut Curry Vegetables  
Water, Coconut powder 22% (Coconut Extract, Maltodextrin, Sodium Caseinate) White Sugar, Soybean Oil, Salt, Coriander Powder, Garlic powder, Onion Powder, Tumeric Powder, Spices  
Contains Milk product, Soybean
- 30) [REDACTED] Cantonese Stir Fry Beef  
Oyster sauce (Water, Sugar, Salt, Oyster extracts, Modified Corn Starch, Colour 150a), Sugar, Water, Soy sauce (Water, Salt, Soybeans, Wheat Flour, Sesame Oil, Salt, Flavour Enhancers 621, 627, 631, Ginger, Dehydrated Garlic, Modified Corn Starch, Soybean Oil, Shallots, Stabilizer 415  
Contains Soybeans, Wheat, Sesame Seeds, Sulphites
- 31) [REDACTED] Ready Sauce for Lemon Chicken  
Water, White Sugar, Corn Syrup Powder, Concentrated Lemon Juice 12%, Salted plum (Plum, Salt) Rice Vinegar, Modified Corn Starch, Salt, Acid 330, Natural Flavouring, Acidity Regulator 531, Stabilizer 415, Tumeric powder  
Contains Wheat, Soybeans

Comment: what ingredients contain the wheat and soy?

## Cereals:

- 32) [REDACTED] cornflakes 300g packet [REDACTED] (Bold as appears on label) *11 ingredient names*  
**The ingredients** Corn (88%), Sugar, Salt, **Barley** Malt Extract, Mineral (iron), Vitamins (Niacin, Thiamin, Riboflavin, Folate)  
**Contains Gluten containing cereals**  
**May contain Wheat and Soy**
- 33) [REDACTED] Cornflakes  
May contain traces of peanuts and/or tree nuts
- 34) [REDACTED] Ricies  
May be present ....
- 35) [REDACTED] Honey with LSA *12 ingredient names*  
Ingredients: Wholegrain fine cut **oats** (71%), LSA (10%) (linseed, sunflower, almond) sugar, rice bran oil, Manuka honey (2%) **barley** malt extract, corn maltodextrin, natural flavour, sea salt  
Contains almonds and cereals containing gluten  
May contain milk, soy, sesame, sulphites and other tree nuts
- 36) [REDACTED] MILO 350g packet (Bold as appears on label) *28 ingredient names*  
**Ingredients**  
**Contains gluten containing ingredients Milk and Soy as indicated in bold type**  
Wholegrain cereals (50%) **Wheat** (34%), Corn (16%), Sugar, Formulated Supplementary Food Base: MILO (10%) (malt Extract (Barley and Rice and /or **Wheat**) **Milk** solids, Sugar, Cocoa, Maltodextrin, Emulsifier (**Soy** Lecithin) Minerals (Calcium, Iron) **Barley** Malt Extract, Skimmed **Milk** Powder, Sunflower Oil, Emulsifier (**Soy** Lecithin), Flavours (chocolate and Vanillin) Salt  
**Vitamins and Minerals**  
Minerals (Calcium, Iron & Zinc) Vitamins (C, Niacin, E, B1, B2, B6 and Folic Acid)  
**May contain other gluten containing ingredients and sulphites**

- 37) [REDACTED] Light Berry Cereal 38 ingredient names  
38 ingredients. Ingredients Cereals (52%) (Corn, Buckwheat, Rice), Dried Fruit (17%)(Sultanas, Humectant (Glycerol)), Currants, Dried sweetened Cranberries (Sugar, Cranberries, Sunflower Oil)), Nuts and Seeds (12%) (Almonds, Sunflower Seeds, Linseeds, Pumpkin Seeds), Brown Sugar, Sugar, Rice Bran Oil, Blackcurrant Juice Concentrate (1%), Golden Syrup, Glucose (Preservative (223)), Emulsifier (471), Salt, Natural Flavour, Vitamins (Vitamin E, Niacin, Thiamin, Riboflavin, Folate), Mineral (Iron).  
"Contains tree nuts and added sulphites. No gluten containing ingredients are intentionally used in this recipe. While VOGEL's takes great care during processing, this product is produced in an environment which also produces gluten and wheat containing cereals"

Comment: The above manufacturer wording is creating concern unnecessarily for the consumer as this product appears to be very safe to be called gluten free from the company website information.

The [REDACTED] website has very comprehensive information about [REDACTED] Gluten Free, factory cross contamination handling procedures and the gluten testing done on their products.

*"We conduct gluten testing on all product contact surfaces prior to production to validate surfaces are free from gluten and all Vogel's finished products are tested for gluten, to a detectable level of 5ppm."*

This will provide significant reassurance to the general public that their products are gluten free, consumers would probably be happy to buy this product and be reassured by the extensive care taken to make the products gluten free.

As a health professional educating about allergen avoidance this provides very good evidence of product safety for a gluten free diet.

- 38) [REDACTED] Toasted Power Muesli (Bold as appears on label) 17 ingredient names  
Ingredients Cereals (wholegrain rolled oats, wholegrain **wheat**) sugar, nuts 4.8% (**cashews, almonds**), seeds 2.3%) (sunflower, pumpkin), canola oil, honey, flavour, caramelized sugar syrup, **barley** malt extract, salt, emulsifier (471)  
**Contains gluten (oats, wheat, barley), cashews and almonds**  
**May be present: peanuts, soy and other tree nuts**

- 39) [REDACTED] Muesli 5 Grains and Hazelnut 28 ingredient names  
Ingredients: Wholegrains (87%) (oats, triticale, barley, wheat, wheat flakes (wheat, sugar, inulin, barley malt extract, salt, emulsifier (471), vitamins (niacin, thiamine, riboflavin, folic acid), mineral (iron), buckwheat), brown sugar, pumpkin seeds, almonds (1.4%), hazelnuts (1.4%), sunflower seeds, cashews, (1.2%), linseeds, sugar, flavour (natural vanilla)  
Contains gluten and tree nuts (almonds, hazelnuts, cashews)  
May be present: peanuts, soy, and other tree nuts

- 40) [REDACTED] Light almond and ancient grains cereal 37 ingredient names  
Contains gluten containing cereals, tree nuts and added sulphites

- 41) [REDACTED] pear and banana baby rice cereal HJ Heinz 14 ingredient names  
Ingredients: Ground rice(71%) pear puree (14%) Pear Juice Concentrate (7%) Banana puree (6%) Sunflower oil, Vitamin C, Antioxidant (Herb Extract) Mineral (Iron), Natural Fruit Flavours, Traces of Milk, Wheat & Soy  
✓egg free ✓yeast free - placed in a shaded area at the top of the ingredient list

Comment: No allergen statement underneath ingredient list. Has "traces of" listed as an ingredient

## Confectionary

- 42) [REDACTED] Kool Mints 220g packet *17 ingredient names*  
Ingredients: Cane sugar, Glucose Syrup (From Corn), Maltodextrin (from Corn or Tapioca), Vegetable Oil, Stabiliser (Hydroxypropyl Starch, Flavours, Colour (Titanium Dioxide), Glazing Agent (Carnauba Wax) **Egg** White, Emulsifier (**Soy** Lecithin)  
**Contains Soy and Egg**
- 43) [REDACTED] Kool Fruits 220g packet *17 ingredient names*  
Ingredients: Cane sugar, Glucose Syrup (From Corn), Maltodextrin (from Corn or Tapioca), Vegetable Oil, Food acid (330) Acidity Regulator (331), Colours (120, Black Carrot extract 100, 141, 160a, 160b,), Stabiliser (1440) Flavours, Glazing Agent (903), Emulsifier (**Soy** Lecithin) **Egg** White.  
**Contains Soy and Egg. No Artificial Colours**
- 44) [REDACTED] 280g packet *16 ingredient names*  
contains 75% milk chocolate and 7.5% malt extract. **Ingredients:** Sugar, **Milk** Solids, Cocoa, Butter, Glucose Syrup, (Sources Include **Wheat**) **Barley** Malt Extract, Cocoa Mass, Vegetable Fat, Emulsifiers (**Soy** Lecithin, 492), **Wheat** Gluten, Raising Agents (501, 500), Salt, Natural Flavour (Vanilla Extract), Pectin. Milk Chocolate Contains a Minimum of 25% Cocoa Solids and 22% Milk Solids

Comment: label information as format on label.

Good to have allergens in bold as there is not a 'Contains' statement

It would be more helpful for allergen labeling to have an Allergen 'Contains' statement before or instead of the last statement about 'milk chocolate contains a minimum....22% milk solids'

[REDACTED] Paediatric Dietitian  
Starship Children's Hospital

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