

# SUBMISSION to Food Standards Australia New Zealand (FSANZ)

## Consultation Paper - W1070

### Plain English Allergen Labelling

#### 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, as it does not mention or require declaration of a mollusc

From p5 of this FSANZ Consultation paper W1070 – “Standard 1.2.3 requires that food labels declare the presence of ‘fish’ (except for isinglass). However, Standard 1.2.3 does not define what is meant by ‘fish’; instead a definition of fish is provided in *Standard 2.2.3 – Fish and Fish Products* at clause 2.2.3–2 as: **fish** means a cold-blooded aquatic vertebrate or aquatic invertebrate including shellfish, but not including amphibians or reptiles.

The term ‘shellfish’ is not defined in the Code, but according to the Macquarie Dictionary is comprised of molluscs and crustacea (Macquarie University 2015).”

As both finfish and crustacea require declaration, so should a mollusc.

It should be subject to the same labelling declarations as fish (finfish) and crustacea.

- A mollusc is part of the ‘Shellfish’ group with crustacea
- Crustacea require a separate and specific mandatory labelling, but mollusc do not
- Molluscs are botanically different to the crustacea group, and mollusc protein is allergenically different to both finfish and shellfish
- A person with a mollusc allergy can often tolerate fish and /or crustacean
- A fish or shellfish declaration is not specific enough for a mollusc allergic person, as they don’t know if the term fish is for a finfish, or is for a mollusc which is also covered in the fish definition in the shellfish term

Food Standard laws and User Guides should reflect the correct botanical grouping of these three different aquatic groups.

The European Union has mandatory declaration of molluscs

[https://www.fsai.ie/legislation/food\\_legislation/aquaculture/labelling\\_of\\_aquaculture\\_products.html](https://www.fsai.ie/legislation/food_legislation/aquaculture/labelling_of_aquaculture_products.html)

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

- As above, a fish or shellfish declaration is not specific enough for a mollusc allergic person, as they don’t know if the term fish is for a finfish, or is for a mollusc which is also covered in the fish definition in the shellfish term. They cannot identify if a specific mollusc is present
- Assumption that fish means a finfish & the product is safe for them to eat, could have serious and harmful consequences if the ingredient was actually a mollusc
- Concern, confusion and stress that a ‘fish’ term can also mean an oyster, scallop or mussel can lead to unnecessary avoidance and restriction of foods by the mollusc allergic individual and thus for the rest of the family
- Having a mollusc as part of a ‘fish’ definition in the shellfish term and declaration is too confusing for the consumer who may associate fish only with the finfish species. It is also not botanically correct

### Recommendations:

- Molluscs should be subject to the same food laws and mandatory declarations as for finfish and crustacea
- Mollusc should have to be declared in the ingredient list and in a 'Contains' statement

### 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 were 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 and oyster declared as ingredients.
- These oyster sauce bottles seen did not have 'Contains' statement on them, so it is unknown how the oyster would have been listed in that

### 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
- These oyster sauce bottles in Q2) above did not have 'Contains' statement on them, so it is unknown how the oyster would have been labelled - as oyster vs fish
- 'May Contain' fish/shellfish statements are another source of confusion and stress for consumers, as the specific finfish fish, crustacea or mollusc may not be able to be identified. For those who have significant and sometimes severe reactions this could lead to unnecessary fear, food avoidance and restriction.  
e.g. Homebrand Oriental Flavoured Noodle Cup Label 25)  
Allergen Advice: contains gluten soybean  
May be present crustacea, fish, eggs and milk  
e.g. Maggi Mushroom Soup Mix "Manufactured on equipment that also processes products containing Shrimp and Fish"

#### 2.2.3 Question

### 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. e.g. Labels 32),40)
- The words 'cereals containing gluten' are also used  
e.g. Sanitarium Options NZ Manuka Honey with LSA (bold as on label) Label 35)  
**Contains almonds and cereals containing gluten**

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

- No, a 'gluten containing cereal' label is not helpful for a cereal allergic person
- A cereal allergy is usually to one specific cereal only, with other cereals tolerated. These other cereals tolerated can also contain gluten  
e.g. a wheat allergic person can eat and tolerate barley and rye  
Other cereal allergies include Rice – e.g. those infants with FPIES (Food Protein Induced Enterocolitis Syndrome), Corn e.g. those with Eosinophilic Oesophagitis
- The Cornflakes 'Contains' label is unhelpful for a wheat allergic person as they do not have the specific cereal named in the 'Contains' statement  
The wheat allergic person has to read all the ingredients to find if wheat is not present

e.g. Skippy Cornflakes 300g packet Sanitarium (Bold as appears on label) Label 32)  
**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**

- Commercial breakfast cereals, biscuits and crackers can contain a long list of ingredients and their compound ingredients, e.g. up to 38 in some cereals
- For a cereal allergic person the most accurate, obvious and helpful way of labelling and thus identifying a cereal ingredient is to have the cereal specifically named in the ingredient list and in a 'Contains' statement

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?

Unable to comment, have not seen a label for this.

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?

There are variations in the wording and clarity when manufacturers declare gluten in the "Contains" statement, along with naming the specific cereal in the ingredient list.

- In the contains list gluten is declared but do not specify the cereal it refers to,  
 e.g. Hubbards Natural 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
- A muesli bar label declared one gluten containing ingredient but not the other. The oats were specified with gluten beside it, but not the Malt Extract (from barley). Malt was the 24<sup>th</sup> ingredient of 31 in the list. See attached Photo A) Muesli bar  
 Contains: Oats (Gluten), Milk products, Soy, Peanuts, Sulphites
- Words such as - "gluten containing ingredients" Label 36)
- Cereal named in brackets after the gluten declaration, in addition to the cereal name in the ingredient list  
 e.g. Hubbards Simply Toasted Power Muesli (bold as appears on label) Label 38)  
 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**

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?

If so, then can you comment on why this labelling practice is occurring?

- The word 'gluten' or 2 words 'Contains gluten' are shorter than 'cereals containing gluten', take up less space on a label, it is easier & quicker to read
- The words 'Gluten (oats, wheat)' has the essential information in a minimum of words
- In the 'Contains' list manufacturers use 'gluten' or 'gluten containing cereals' as the general term to avoid listing the specific cereals again

Whether it is/is not useful information for consumers with a cereal allergy?

- No, a "Contains gluten" statement is not helpful for the cereal allergic consumer
- A 'contains gluten' statement is helpful for only a person with coeliac disease.  
 It is a general term to indicate the presence of a range of different types of foods which can contain gluten

- A cereal allergic person needs to have the specific cereal listed in both the ingredient list and in a 'Contains' statement at the end. Ingredient lists can be very long to read through with many names plus compound ingredients in brackets and numbers. The specific cereal ingredient in the 'Contains' statement at the end is a specific and obvious word to see and identify.
- This highlights the need for a label to identify both gluten containing ingredients and the specific cereal ingredient. The term 'gluten' does not meet both needs.

**Recommendation:**

- That all cereals require a mandatory declaration in the ingredient list when present in a food, not just 'cereals which contain gluten'
- List the specific cereal in the ingredient list and in a "Contains" statement
- List gluten in brackets beside the one relevant cereal ingredient in the Contains label, or at the end of 2 or more gluten containing ingredients
- Do not use the words 'cereals containing gluten' in the ingredient list or 'Contains' statement

**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 number of gluten free products declare the name of one cereal on the label and 'gluten free', and they also contain other cereal(s)

The other cereals are clearly labelled in the Ingredient list on the back of the packet  
e.g. some gluten free pastas and crispbreads, e.g. Orgran gluten-free products.

**Would such information be unclear to consumers with a cereal-specific allergy, and if so, how?**

- The declaration of the cereal on the label and that it is gluten free is unclear for cereal allergic consumers, as they may be allergic to another cereal which is not named on the label, but is listed as an ingredient
- The name of the cereal on the front of the packet is usually the cereal that is the main/major ingredient. Other cereal ingredients in smaller amounts will be listed in the ingredient list on the back or side of the packet.
- The cereal allergic person must also look at the ingredient list to check all ingredients and identify the cereals listed  
e.g. Orgran Buckwheat Spirals – also contain rice flour as listed in the ingredients.  
Orgran Quinoa Spirals – contain 3 other cereals besides quinoa.  
Ingredients: Rice flour, Maize flour, Quinoa Flour, Millet Flour

**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 declare the specific name of the nut in the ingredient list in labels seen
- However not all declare the specific nut in the 'Contains' Statement as well, it is listed as 'tree nuts'
- There is variation and thus inconsistency in how the specific nut and the term tree nuts or nuts are used both in the Ingredient list and in the Contains statement

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

- There are a wide range of tree nuts which people can react to
- 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
- The tree nuts tested for by the Auckland Hospital laboratory on a RAST blood test and a skin prick test are for almond, brazil, cashew, hazelnut, macadamia, pecan, pistachio, walnut and coconut
- There may be other tree nuts which people react to, but a commercial extract is not available to test it within NZ. A skin test can be done using a solution made from the fresh

nut if available.

#### Other tree nut names and varieties

A reference list of other tree nuts and alternative names from overseas countries could be helpful for manufacturers and importers to help identify tree nuts requiring declaration, and placed in the Food Standards Code/ User Guides

e.g. the ASCIA Dietary Avoidance - tree nut allergy diet sheet lists beer nuts, non-gai nuts, pecan/mashua 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?

New Zealand does not have a national / MOH database to record tree nut allergic reactions we are aware of.

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 do this
- However there is variation and thus inconsistency in how the specific tree nut is named and the term 'tree nuts' or 'nuts' are used in the Ingredient list and in the Contains statement
- The specific nut is named in the Ingredient list and in the 'Contains' statement, Label 14)  
e.g. Zesti Christmas Biscotti  
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**
- Ingredient list has term 'Nuts' followed by the specific name of the nut in brackets, but the 'Contains' statement has only the term 'tree nuts', Label 37)  
e.g. Vogel Café-Style Light Berry Cereal  
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
- Ingredient list has the term 'Nuts' followed by the specific name of the nut in brackets, and the 'Contains' statement has the specific nut listed, Label 38)  
Hubbards Simply Toasted Power Muesli (Bold as appears on label)  
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**
- Ingredient list has the specific tree nut named and the 'Contains' statement has 'tree nuts' followed by the specific tree nut name in brackets, Label 39)  
Hubbards Natural Muesli 5 Grains and Hazelnut  
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



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

- Where consumers are avoiding all types of tree nuts the term 'tree nuts' is adequate and enough information to make the correct food choice
- But for those who can tolerate specific nuts but not others the words 'tree nuts' only in the 'Contains' statement does not provide the information to make the correct food choice
- The consumer cannot identify which specific nut is present from the words 'tree nuts'
- The consumer then has to read the ingredient list to see which tree nut is present
- As ingredient lists can be very long there is the potential for a tree nut name to be missed, especially in a busy shopping situation
- Nuts are also a confusing word as it is unclear if this means tree nuts or peanuts
- It is more accurate and safer to have the specific tree nut named in the ingredient list and in the 'Contains' statement. The Contains statement enables direct and obvious identification of the specific tree nut.
- The words tree nuts or nuts should not be used instead of naming the specific tree nut
- The term tree nuts with a % amount appears to be used by some manufacturers, this would be acceptable if the specific tree nut is named in both the ingredient list and in a 'Contains' statement

**Recommendation:**

- The specific tree nut is declared in the ingredient list and in the Contains statement
- The term tree nuts with a % amount would be acceptable when the specific tree nut is named in both the ingredient list and in a 'Contains' statement

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.

- No, there does not appear to be a lot of labels with unfamiliar or unrecognisable terminology, but only a small number of products were looked at, and not many from the USA or Asian manufacturers
- Whey powder and Sodium Caseinate were listed on 2 different labels which may be unfamiliar terminology for some milk allergic consumers
- A sauce with Sodium Caseinate had a 'Contains Milk product, Soybean' label which enabled milk to be identified easily for someone who may not know what sodium caseinate was. Label 29)
- A soup ingredient's label with whey powder did not specify milk beside whey powder, but there were other obvious milk names in the ingredient list. It had a very long ingredient list and font was very small. It did not have a 'Contains' statement to identify milk. Label 27).
- The terms/heading used to heading to notify presence of allergens did vary with headings such as Allergen Advice; Allergens; Contains; Any allergies?
- Other significant difficulties with identifying allergens on the packet label are:
  - where there are a number of ingredients 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
  - if the 'Contains' statement is not in bold
  - where there is 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.

- There are many alternative forms, names and technical names of a food allergen which can be used and listed as an ingredient. A consumer cannot be expected to recognize and remember all of these.  
e.g. couscous is one of 23 names in a list of foods and ingredients that contain wheat and should be avoided on the ASCIA Dietary Avoidance – wheat allergy diet sheet.

- A 'Contains' statement with the common term / generic name of egg, milk, peanut or soy is enables accurate identification of one or more specific food allergens.  
This is particularly important for those with two or multiple food allergies.  
There can be a greater risk of making a mistake when trying to identify two or more allergens in a long ingredient list.
- For those with English as a second language and some with limited understanding of English the 'Contains' statement has the main allergen identifier word of egg, milk, peanut, soy, wheat etc
- A 'Contains' statement is an important alert to the presence of an allergen where it may not be an expected ingredient  
e.g. egg white in a chocolate bar - Mars bars. Label has a 'Contains' statement listing egg and egg white is in the Ingredient list

#### **Recommendations:**

- A 'Contains' statement should be included on all food packet labels which have an ingredient list
- A 'Contains' statement should name the allergen in a simple / recognizable word / generic name e.g. egg, finfish, milk, wheat, soy, barley, rye, oats, peanut, specific tree nut name almond etc
- A 'Contains' statement should be in bold
- A 'Contains' statement should have a consistent heading e.g. 'Allergens' or 'Contains'
- In the ingredient list the ingredient containing the allergen should also be in bold

#### **Precautionary Labelling Statements**

From labels we reviewed there was a wide range of terminology and format used, and inconsistency in the wording of precautionary allergen labelling statements.

The meaning of these was often unclear, and relevance to the food allergic consumer questionable.

See the Packet Label Reference List attached for the food product's ingredient list and comments.

It is hoped FSANZ can continue to progress the work into and review of this area as covered in the FSANZ Dec 2010 W3 Review document.

We appreciate the opportunity to contribute to this review of food allergen labelling.

#### **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

Photo A) Muesli Bar Label





## **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) Griffin's Roundwine, Superwine biscuits  
Produced in a factory handling egg products, sesame seeds, peanuts and other nuts
- 2) Griffin's Cookie Bear biscuits  
Produced in a factory handling tree nuts and sesame seeds
- 3) Select Malt Biscuits  
May be present: milk, soy beans, sesame seeds and tree nuts
- 4) Huntley and Palmers 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) Arnott's crackers, biscuits  
May contain traces of.....
- 6) Select Brown Rice Crackers  
May be present gluten, milk, soybeans
- 7) Arnott's Shapes Bacon  
May contain traces of egg, nut and sesame
- 8) Arnott's Shapes BBQ  
May contain traces of egg, milk, nut and sesame
- 9) Arnott's Shapes Cheddar  
May contain traces of egg, nut and sesame
- 10) Arnott's Shapes Chicken Drumstick  
May contain traces of egg, peanut, tree nut and sesame
- 11) Eta Cravers BBQ, Chicken  
Produced in a factory handling milk products, soy bean products, sesame seeds, peanuts and other nuts

- 12) Molly Whoppy 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) Molly Whoppy 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) Zesti 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) Griffin's 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) Burgen Wholemeal and Seed  
 May be present soy and milk
- 17) Natures Fresh White and Toast, Molenberg & Freya  
 Made on a line that also produces products that contain sesame
- 18) Pam's English Split Muffins  
 May contain milk and sesame
- 19) Quality Bakers Muffin Splits  
 Made on a line that processes products containing milk and sesame
- 20) Vogel Original Mixed Grain Toast  
 Breads containing sesame, soy and eggs are made in the Vogel bakery

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

- 21) Abe's 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) Eta 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) Homebrand Corn Chips

Ingredients: corn, vegetable oil, salt

Allergen Advice: may contain gluten, milk, peanuts, soy and tree nuts

- 24) 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

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) Homebrand Oriental Flavoured Noodle Cup

Allergen Advice: contains gluten soybean

May be present crustacea, fish, eggs and milk

- 26) Maggi Oriental Noodles

Contains soy and wheat

Made on equipment that also processes celery, crustacea, fish, milk and mustard

### **Soups**

- 27) Watties Squeeze & Stir 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) Signature Range 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) Lee Kum Kee 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) Lee Kum Kee 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) Lee Kum Kee 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) Skippy cornflakes 300g packet Sanitarium (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) Kellogg's Cornflakes  
May contain traces of peanuts and/or tree nuts
- 34) Select Ricies  
May be present ....
- 35) Sanitarium Options NZ Manuka 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) Nestle 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) Vogel Café-Style 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 Vogel’s website has very comprehensive information about Vogel’s 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) Hubbards Simply 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) Hubbards Natural 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) Vogel’s Café-style Light almond and ancient grains cereal 37 ingredient names  
 Contains gluten containing cereals, tree nuts and added sulphites
- 41) Farex 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) Allen's 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 (Camauba Wax) **Egg** White, Emulsifier (**Soy** Lecithin)  
**Contains Soy and Egg**
- 43) Allen's 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) Maltesers 280g packet *16 ingredient names*  
Maltesers 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'

Jennifer Heyward, Paediatric Dietitian  
Starship Children's Hospital

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