

Labeling Language

Wisconsin Food Allergen Fact Sheet #5

Plain Language, Required Ingredients and Supplemental Statements

Plain language on labels

Ingredient terms commonly understood by consumers for the major food allergens should be disclosed on the information panel, within, or in the immediate proximity to, the ingredient statement of the food label, by using one or more of the following methods:

- 1) The use of a statement such as, “**Contains _____**,” with the blank filled in with the ingredient term commonly understood by consumers for the major food allergens. (e.g. “Contains Soy and Milk”). This statement may be pre-fixed by an allergy information statement phrase (e.g. **Allergy Information: Contains Soy and Milk**).
- 2) The use of an asterisk or other reference mark next to the ingredient name or class name that refers the consumer to a statement that identifies the ingredient term commonly understood by consumers for the major food allergens.

Example:..., casein*, whey*, semolina†, natural flavor‡,... would appear in the ingredient statement, referring to the consumer statement, such as:

“Allergy Information: Contains * Milk, and †wheat”.

- 3) The use within the ingredient statement of a parenthetical statement following the ingredient name or class name that identifies the allergens that are present in the ingredient such as:
“..., natural flavor(peanuts and soy), whey (milk)....”.
- 4) The use within the ingredient statement of a name that identifies the presence of the allergen such as:
“natural walnut flavor”, or “natural peanut flavor.”
- 5) The use of bolding or highlighting within the ingredient statement, or in allergy information statements, in immediate proximity to the ingredient declaration.

Required ingredient labeling

Ingredients required to be declared on the label, must be listed by their common or usual name in descending order of predominance by weight. **Source: 21CFR 101.4 (a)**

An complex ingredient which itself contains two or more ingredients, must be declared in the ingredient statement by:

- 1) Declaring the common or usual name of the multi-component food, followed by a parenthetical listing of each ingredient in descending order of predominance.
 - 2) Declaring each ingredient in the multi-component food in descending order of predominance without listing the ingredient itself.
- If the term “salad dressing” appears on the label ingredient declaration; then each sub-ingredient must be listed.
 - If the term “soy sauce” appears on the label ingredient declaration; then each sub-ingredient must be listed. **Source: 21CFR 101.4 (b) (1)**

Each individual ingredient of a food intended for consumption shall be declared by its common or usual name, for example:

- If the term “yolk” appears on the label ingredient declaration and in fact it is “egg yolk”; then it must be labeled as “egg yolk”. **Source: 21 CFR 101.4 (b)**
- If the term “nondairy” appears on the label ingredient declaration then it must be followed by a parenthetical statement identifying it’s source (e.g. ...,casein(a milk derivative) **Source: 21 CFR101.4 (d)**

Supplemental labeling statements

Food processors that prepare food potentially exposed to inadvertent contact with major food allergens acknowledge that labeling is not a substitute for good manufacturing practices (GMP). Supplemental labeling statements are used when the ingredient is not present in the product, but risk of contamination is present even when the firm is using Good Manufacturing Practices. **Supplemental allergen statements should be used judiciously and only when all four of the following criteria are met:**

- 1) The presence of the Major Food Allergens is documented through visual examination or analytical testing of the processing line, equipment, ingredient or product, or other means;
- 2) The risk of the presence of the Major Food Allergens is **unavoidable** even when current GMP’s are followed.
- 3) A Major Food Allergen is present in some, but not all, of the product; and,
- 4) The presence of a Major Food Allergen is potentially hazardous.

When all four of these criteria are satisfied, the supplemental allergen statement should be placed, at the end of, or in close proximity to the ingredient statement.

Some examples are:

“May Contain (allergen)”.

“This product was processed on machinery that was used to process products containing (allergen)”.