

Guide to the Labelling of Packaged Food



For retail sale
December 2016



Government
of South Australia

SA Health

Introduction

This is a guide to the labelling requirements of the Australia New Zealand Food Standards Code (“the Code”) that has been adopted into food law by all Australian States and Territories. This guide is designed to help small businesses prepare basic food labels for retail sale.

As indicated in this guide, food businesses should refer to the Code for more information if:

- > claims or statements that may be regulated are made; or
- > the food has specific labelling requirements for additional information.

This guide does not cover all requirements or exceptions that may apply and is not a substitute for independent legal advice. Copies of the Food Standards Code can be obtained from Food Standards Australia New Zealand (FSANZ) at: www.foodstandards.gov.au

Notes

- > A reference in square brackets [1.2.1] refers to the relevant standard in the Code.
- > A reference in this guide to a *small package* means a package with a total surface area of less than 100cm² [1.1.2]

Why Do We Have Food Labels?

Food labels provide information to help us make healthier and safer food choices. They do the following:

- > Tell us which nutrients, in what amounts, are in a product
- > Warn us if a food contains food allergens
- > Inform us if the food is out of date
- > When necessary, explain how to store, prepare or cook the food we buy
- > List product ingredients
- > Give us information on where the food came from.

Essentially, food labels are there to provide us with basic information about what is in the food we eat and how best to handle it.

What Food Must Be Labelled?

The label of food for catering purposes must bear food identification, mandatory warning and advisory statements and declaration, date marking, directions for use and storage, country of origin, food produced by gene technology and irradiation of food. This information is not required on the label of food where that information is provided in documentation accompanying that food.

All packaged food for retail sale must be labelled except exemptions in [1.2.1-6, 1.2. 1-7 and 1.2.1-8]

Where these general exceptions apply to *genetically modified foods, irradiated food, fermented comminuted manufactured and processed meats, kava, royal jelly or foods containing offal* then written information defined in the Code must be shown on the label or displayed with the food.

What Must Appear

1. The name of the food

Packaged food must be labelled with a name or description that will not mislead consumers. For some foods the Code defines the name of a food as a prescribed name and that name must appear on the label.

Foods with prescribed names are listed in [1.2.2-2]

Other foods that do not have a defined prescribed name must show a name or description that indicates the true nature of the food. [1.2.2]

2. Lot and Premises identification [1.2.2]

Generally, food labels must contain information identifying the premises where the food was packed or prepared and the lot (batch).

The lot usually refers to food prepared or packed within a period not exceeding 24 hours.

No specific form of words is defined.

These requirements are usually satisfied if the product is properly date marked and shows the business address of the manufacturer or packer.

Where this is not sufficient identification then additional information that is part of a system devised by the manufacturer or packer must be used.

3. The name and address [1.2.2]

For food recall and contact purposes the label must include the name and business address in Australia or New Zealand of the manufacturer, packer, vendor or importer of the food.

A full business address is required, including the street number, street name, town or suburb and state. A post office box or similar postal address is not sufficient.

4. Mandatory advisory and warning information [1.2.3]

Mandatory advisory statements, warning statements and declaration of certain foods or substances in food may be required on the label. The full up-to-date list is available in Standard 1.2.3

5. Ingredient labelling [1.2.4]

With some exceptions food labels must include a statement of ingredients (the term ingredient includes additives).

Exceptions apply to *alcoholic beverages; packaged water; small packages; milk and cream products in foil top glass bottles and where the name of the food is a full list of all the ingredients*. [1.2.4]

Certain ingredients or products of those ingredients that may *cause a reaction in some consumers* must be declared (including when present as a processing aid). These ingredients are listed [1.2.3-4]

Declaration of these ingredients and their products applies to all foods including the exceptions to ingredient labelling above and to the labelling of portion packs contained inside an outer package if the portion pack has a surface area greater than 30cm².

All ingredients must be listed in descending order of ingoing weight. This means that the ingredient present in the greatest proportion is listed first and so on. Added water must be shown in the ingredient list unless it is used to re-hydrate or reconstitute food ingredients, forms part of a broth, brine or syrup already in the ingredient list or represents less than 5% of the final food.

The position of water or other volatile ingredients is calculated after allowing for losses during manufacture.

If a food contains a *compound ingredient* (an ingredient made from other ingredients) the ingredients in that compound ingredient can either be shown individually in the list or listed in descending order immediately after the name of the compound ingredient as in this example: Milk chocolate (sugar, milk solids, cocoa butter, emulsifier 476, flavour).

All *foods and additives* in a compound ingredient that contributes 5% or more to the final food must be declared. If the compound ingredient contributes less than 5% to the final food then only additives performing a technological function and those ingredients that may cause a reaction in some consumers must be declared.

In the case of some ingredients, it is sufficient to state the generic name of the food. For example, the term “*herbs*” can be used for a mixture of *rosemary, thyme and mint*. This generic listing of food ingredients may be used for items listed on schedule 10 of the Code. The term “sugars” must not be used.

Specific conditions apply to the use of following generic terms:

- > the terms “cereals” or “starch” must be accompanied by the specific name of the cereal used;
- > the term “nuts” must be accompanied by the specific name of the nut;
- > the terms “fats” and “oils” must be identified as being of vegetable or animal origin. If a fat or oil is from *peanut, soy or sesame seed*, that source must be declared. Diacylglycerol oil must be declared by that name. The source of animal fats used in dairy products must be declared; and
- > the term “fish” may be used provided the ingredient does not include crustaceans which must be separately declared by the specific crustacea name.

So the consumer is not misled about the nature of an ingredient, the ingredient name may need to be *qualified*, for example:

cheese powder
or
dried vegetables

In the case of a food additive, the additive must be declared either by reference to its class name followed by the food additive number, or by the class name followed by the prescribed name of the additive, for example:

Colour (102)
or
Colour (Tartrazine)

If a food additive cannot be classified under one of the class names defined in the Code then it must be declared using its prescribed name.

The addition of flavouring must be declared as:

Flavouring
or
Flavour

or alternatively using the specific name or description of the flavouring. Where the additives 620, 621, 622, 623, 624, 625, 627, 631, or 635 are used as flavouring their presence must be declared using the code number or additive name.

The addition of *caffeine* to any food must be declared.

Where from time to time a food ingredient or an additive is replaced with another food or another additive serving the same function, both can be listed provided it is clear that a substitute or alternative ingredient or additive is being declared. For example the ingredient list may state “safflower or sunflower oil” as alternative ingredients.

[1.2.4]

An ingredient, processing aid or additive produced using gene technology may require the declaration “genetically modified” to be shown with the name of the ingredient, processing aid or additive, for example: soy protein isolate (genetically modified)

Exception to this requirement applies to highly refined foods, processing aids or additives from which the novel DNA or protein has been removed. It is not required to declare flavours produced using gene technology if added in a concentration of less than 1g/kg in the final food.

[1.5.2]

If a food or ingredient in a food has been irradiated then this must be declared in a separate statement on the label or in the ingredient list, for example:

Treated with Ionising Radiation

or

Irradiated (name of food)

or

Herbs (irradiated) [1.5.3]

To decide if an ingredient, processing aid or additive must be identified as *genetically modified* or *irradiated*, information must be obtained from the ingredient supplier.

6. Date mark [1.2.5]

Generally, all packaged food with a life of 2 years or less must show a date-mark.

The “BEST BEFORE” form of date mark will be used on most packaged foods. A food with a “BEST BEFORE” date mark can be sold after that date has expired, provided it is safe and suitable for consumption. Examples of where “BEST BEFORE” would be used include shelf-stable foods (such as biscuits, confectionery, canned foods), frozen foods, most raw foods that will be cooked before eaten (meat, chicken, fish) or foods that will noticeably spoil before becoming unsafe.

If a manufacturer or packer believes that for health and safety reasons a food should not be consumed after a certain date the “USE BY” form of date mark must be used. Foods labelled “USE BY” cannot be sold after the date shown.

Foods with a shelf life of 3 months or less must display a date mark that shows at least the day and month. Foods with a shelf life longer than 3 months must show at least the month and year.

Any *storage conditions* that are necessary to ensure that a food will keep for the period indicated by the date mark must be shown, for example: Keep Refrigerated

or

Store at 5°C or less

For bread with a shelf life of less than 7 days, the “BEST BEFORE” date mark may be replaced by a date mark in the form:

BAKED FOR (a date not more than 12 hours after baking)

or

BAKED ON (date)

7. Health and safety advice [1.2.6]

If additional directions for storage or use of a food by the consumer are necessary to protect health and safety these directions must be shown.

For example: Refrigerate after opening

The Code defines specific statements that must appear on packaged raw bamboo shoots and sweet cassava.

8. Nutrition information panel [1.2.8]

Generally, all packaged food labels must include a nutrition information panel.

Provided *no* nutrition claims are made then exceptions to this requirement for a panel are allowed for *foods sold at fundraising events; small packages; fruits, vegetables, meat, poultry or fish sold as single ingredients; alcoholic beverages; herbs, herbal infusion and spices; vinegar; salt; tea and coffee; gelatine; defined additives or processing aids; water including mineral and spring water; jam setting compound; kits for producing alcoholic beverages; kava and sandwiches, rolls, bagels and similar products.*

For foods that are not exempt the example label in this guide provides the format for a standard nutrition information panel.

The [FSANZ website](#) provides an online tool to calculate nutrition information panel values for each standard nutritional property.

Food that needs to be reconstituted or food that is drained before consumption must clearly indicate that the values in the panel are for the reconstituted or drained food.

Where a claim is made for a nutritional property that is not listed in the standard panel then the panel must also include information for that claim. Where a nutrition claim is

made on a small package the Code provides an alternate way to declare the nutrition information.

The Code sets out additional information that must be included in the panel for claims about cholesterol, fatty acids, fibre, sugars or carbohydrates. [1.2.8]

9. Characterising ingredients (percentage labelling) [1.2.10]

Characterising ingredients or components must be declared on the label as a percentage of the final food. The example label in this guide shows a percentage declaration in the ingredient list.

An ingredient or component is a characterising ingredient or component if:

- > it is mentioned in the name of the food;
- > it is usually associated with the food name by the consumer; or
- > it is emphasised on the label in words, pictures or graphics.

Where a food must be reconstituted the percentage may be declared as a percentage of the reconstituted food provided that is clearly indicated.

The percentage must be declared as either the actual or the minimum percentage provided that where the minimum percentage is used, it is clearly indicated.

[The requirement for a packaged food to show the percentage of characterising ingredient does not apply to items listed in Standard 1.2.10 - 3](#)

10. Country of origin [1.2.11]

A label must include a separate statement identifying the country of origin of the food. The form of words is not defined but “Product of”, “Made in” and similar terms have the following meaning:

- > “Product of”, “Produced in” and similar terms mean that the origin of each significant ingredient is from the country identified and all or virtually all the processes of production or manufacture were done in that country; and
- > “Made in”, “Manufactured in”, “Australian made” and similar terms mean that the nature of the food was substantially transformed in the country claimed to be the origin and at least 50% of the production cost was in that country. If this rule cannot be met then a qualified claim may be made, for example:

Made in Australia from imported ingredients
or

Packaged in Australia from local and imported ingredients

Other label information including pictures and graphics must not mislead or conflict with the country of origin statement.

Whole or cut fresh fruit and vegetables in a package that does not obscure the nature or quality of the food must display on the package or on signs in connection with the food the country or countries of origin or that the food is a mix of local and imported product.

11. Health claims (nutrition, health and related claims) [1.2.7]

Health claims (nutrition, health and related claims) are *voluntary statements* that may be made by food businesses on food labels (and in advertising).

There are health claims that are not permitted detailed in Standard 1.2.7

Nutrition content claims are about the content of certain nutrients or substances in food – for example, “low cholesterol” or “good source of dietary fibre”.

Health claims are about a relationship between a food and health. There are two types of health claims:

- > *General level health claims* refer to a nutrient or substance in a food and its effect on a health function – for example, “calcium is good for bones and teeth”.
- > *High level health claims* refer to a nutrient or substance in a food and its effect on a serious disease or biomarker of a serious disease – for example, “diets high in calcium may reduce the risk of osteoporosis in persons 65 years and over”.

Health claims are only permitted on foods that meet the nutrient profiling scoring criterion (NPSC). The FSANZ website provides an online tool to assist in calculating a nutrition profiling score of a food.

Related claims are endorsements which are nutrition content or health claims made with the permission of an endorsing body.

Conditions for making any of the above claims are set out in Standard 1.2.7.

Additional information is available at the [Australia Competition and Consumer Commission](#)

What Must Not Appear

A label must not include words, statements, claims, pictures or graphics that represent a food or its characteristics in a way that is false, misleading or deceptive.

For example, pictures or graphics on a label suggesting how the food can be prepared may need to be accompanied by qualifying information such as “RECIPE”, “SERVING SUGGESTION” or other statement to ensure the consumer is not misled about the contents of the package.

Regulated Statements

In addition to the information set out previously, the following are some regulated claims and statements that may apply:

Labelling of alcoholic beverages [2.7.1]

- > Claims or statements about a vitamin or mineral may not be made except as permitted by the Code. Where a permitted claim or statement is made the label must show additional information about the vitamin or mineral using the format defined in the Code[1.3.2];
- > Claims about electrolyte drinks, infant formulas, foods for infants, formulated supplementary sports foods are regulated; [2.9]
- > Additional labelling statements defined in the Code must be shown on the labels of:
 - *Food containing meat offal*
 - *Minced meat (where reference is made to the fat content)*
 - *Fermented comminuted processed and manufactured meats*
 - *Formed meat or formed raw fish products*
 - *Fruit or vegetable juice blends*
 - *Edible oils*
 - *Electrolyte drink*
 - *Kava*
 - *Formulated caffeinated beverages*
 - *Foods for infants*
 - *Infant and Follow-on formulas*
 - *Formulated meal replacements, supplementary foods and supplementary sports food*
 - *Reduced sodium salts.*

Further information

User guides and fact sheets that provide a more detailed interpretation of the Code with examples can be found under the Industry and Consumer headings on the FSANZ website: www.foodstandards.gov.au

These guides and links cover:

- > Overview of food labelling
- > Country of origin labelling (including unpackaged products);
- > Representations about food (Truth in labelling);
- > Ingredient labelling;
- > Percentage labelling;
- > Food additives;
- > Warning and advisory statements;
- > Date marking;
- > Nutrition information panels;
- > Nutrition, health and related claims
- > Genetically modified foods;

Information can also be obtained from:

The Food & Controlled Drugs,
Department of Health,
Citi Centre Building,
Level 4, 11 Hindmarsh Square,
Adelaide SA 5000
Telephone: 8226 7100
www.sahealth.sa.gov.au/foodstandards

Important note, this information was current September 2016 and may change therefore you need to use this document in conjunction with the latest version of the Code.

More information on the following areas is available from this website:

- > Country of Origin Labelling Requirements for unpackaged foods
- > Display of Kilojoules (kJ) at Multiple-Site Food Businesses
- > A copy of Standard drinks labelling requirements for alcoholic beverages

Other labelling legislation

For enquiries concerning:

Weights and measure

National Measurement Institute
22-24 Furness Ave
Edwardstown SA 5039

1300 686 664

Beverage container deposit legislation

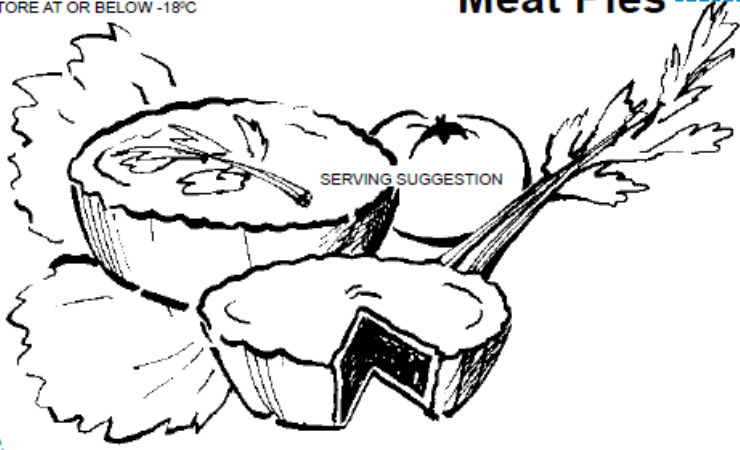
Contact:
Environmental Protection Authority,
Level 8, Victoria Square, Adelaide SA 5000
Telephone: 8204 1180

The Label

Where a label includes statements, claims or other information that is in addition to the information required by the Code then reference must be made to the Code for the rules or prohibitions that may apply.

Best Before 12 JUL 14
STORE AT OR BELOW -18°C

Meat Pies



NUTRITION INFORMATION
SERVINGS PER PACKAGE – 4
SERVING SIZE - 175g

	QUANTITY PER 175g SERVING	QUANTITY PER 100g
ENERGY	1815kJ	923kJ
PROTEIN	25.9g	14.8g
FAT - Total	20.6g	11.8g
- Saturated	10.0g	5.76g
CARBOHYDRATE	23.6g	13.5g
- Sugars	1.2g	0.7g
SODIUM	471mg	269mg

All values are average quantities

INGREDIENTS
WHEAT FLOUR, MEAT (MINIMUM 25%), WATER, ANIMAL AND VEGETABLE FAT, ONION POWDER, HYDROLYSED VEGETABLE PROTEIN, EGG, THICKENER (410), SUGAR, MINERAL SALT (450), SALT, COLOUR (150a), HERBS, PRESERVATIVE (223).

FINEFOOD CO,
20 MAIN ST,
ADELAIDE,
SOUTH AUSTRALIA.

PRODUCT OF AUSTRALIA **700g**

Date Mark and storage conditions

Name of the food

Where a food is packed using variable weights or volumes the number of servings per package can be replaced with servings per kilogram or other appropriate unit

The word serving may be replaced with the word *slice*, *pack*, or *package* or other common unit of measure including *metric cup* or *metric tablespoon*

A statement of ingredients in descending order of ingoing weight showing the percentage of the characterising ingredient

Weights and measures

The nutrition information panel information must clearly indicate that the values are average quantities or if some are minimum or maximum quantities indicate those values that are minimum or maximum quantities

Name and business address in Australia or New Zealand and a separate *Country of Origin* statement

Legibility and Print size

All required words, statements or expressions must be in the English language. Information in other languages is permitted if it does not negate or contradict the information in English.

With the exception of required warning statements no specific print size is defined. However, the information must be legible, set out prominently and be in a distinct contrast to the background.

Warning statements required by the Code must be in a type size of not less than 3mm or 1.5mm on small packages.
Standard 1.2.1 Division 6 1.2.1 – 25

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For more information

**The Food and Controlled Drugs Branch,
Department of Health,
Citi Centre Building, Level 4,
11 Hindmarsh Square, Adelaide SA 5000
Telephone 8226 7100
www.sahealth.sa.gov.au/foodstandards**

**A copy of Standard drinks labelling requirements for
alcoholic beverages is available from this web site.**

Non-English speaking:

For information in languages other than English, call the Interpreting
and Translating Centre and ask them to call The Department of Health.
This service is available at no cost to you, contact (08) 8226 1990.

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