



NZFSA Food Labelling Guide





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Acknowledgements

In addition to the personnel of the New Zealand Food Safety Authority (NZFSA) and the Ministry of Agriculture and Forestry (MAF) legal team, many people have assisted with developing this Food Labelling Guide. Special acknowledgement is due to Food Standards Australia New Zealand (FSANZ), the New Zealand Commerce Commission, the New Zealand Ministry of Consumer Affairs, and Environmental Risk Management Authority, New Zealand for their reviews of parts of the Guide and also to food labelling consultants, McFoodies Ltd, who assisted NZFSA in compiling the Guide. NZFSA also gratefully acknowledges that information from the FSANZ website has been utilised extensively as reference material while developing this Guide.

www.nzfsa.govt.nz

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Every effort has been made to ensure the information in this publication is accurate. NZFSA does not accept any responsibility or liability whatsoever for any error of fact, omission, interpretation or opinion that may be present, however it may have occurred.

NZFSA Labelling Guide companion to Food Standards Code (Up to and including Amendment 107)

Check website for latest version: www.nzfsa.govt.nz

Issue Date	Section		Description	Food Standards Code
July 2007	Section 0		Introduction	
May 2009	Section 1		Main Flow Diagram – Labelling Overview	
July 2007	Section 2		Quantity Marking Requirements – Weights and Measures Regulations 1999 and Amendments Flowchart	
May 2009	Section 3		Do I need to Fully Label my Food Product? – Flowchart	Standard 1.2.1
May 2009	Section 4	A	What Labelling and Information do I Need to Provide for my Retail Food Product which is Exempt from being Fully Labelled? – Flowchart	
May 2009		B	Food for catering purposes – Flowchart	
July 2007	Section 5		Does my Food Product or any of its Ingredients have Product-Specific Labelling Requirements? – Table	Chapter 2 Standards
May 2009	Section 6		Food Identification Labelling and Legibility Requirements – Flowchart	Standards 1.2.2 & 1.2.9
July 2007	Section 7		Warning and Advisory Statements and Declarations – Flowchart	Standard 1.2.3
July 2007	Section 8	Part 0	Statement of Ingredients – Introduction	Standard 1.2.4
July 2007		Part 1	Statement of Ingredients – Does my Food Product Require an Ingredient Listing? – Flowchart	Standard 1.2.4
July 2007		Part 2	Statement of Ingredients – Does this Ingredient Need to be Included in my Food Product's Ingredient Listing? – Flowchart	Standard 1.2.4
July 2007		Part 3	Statement of Ingredients – How should I Declare this Ingredient in my Ingredient Listing? – Flowchart	Standard 1.2.4
July 2007	Section 9		Date Marking – Flowchart	Standard 1.2.5
July 2007	Section 10		Storage Directions and Directions for Use and Storage – Flowchart	Standards 1.2.5 & 1.2.6
July 2007	Section 11	Part 0	Nutrition Information Panel (NIP) – Introduction	Standard 1.2.8
July 2007		Part 1	Nutrition Information Panel – Does my Food Product Require a Nutrition Information Panel (NIP)? – Flowchart	Standard 1.2.8
July 2007		Part 2	Nutrition Information Panel (NIP) – What does the NIP on my Product's Label need to Include? – Flowchart	Standard 1.2.8
July 2007	Section 12		Percentage Labelling	Standard 1.2.10
July 2007	Section 13		Genetically Modified Food Declarations – Flowchart	Standard 1.5.2
July 2007	Section 14		Irradiated Food Declarations – Flowchart	Standard 1.5.3
July 2007	Section 15		Summary Checklist	
July 2007	Appendix 1		Glossary	
July 2007	Appendix 2		Determining the Surface Area of a Package	
July 2007	Appendix 3		How to Check that Ingredients and Foods are Permitted (including Novel, Genetically Modified, and Irradiated Foods, Certain Plants and Fungi, Additives, Vitamins and Minerals, and Processing Aids)	
July 2007	Appendix 4		How To Determine the Correct 'Descending Order' Position of Added Water and Other Volatile Ingredients in Cooked or Heated Foods	
July 2007	Appendix 5		Ingredient Listing Examples	
July 2007	Appendix 6		Nutrition Information Panel (NIP) Formats	
July 2007	Appendix 7		Conditions for Making Certain Nutrition Claims	
July 2007			References	

Food Labelling Requirements

Food product information assists consumers with purchase decisions, can help maintain health, and in some situations can be essential to prevent adverse or life threatening reactions. Food labelling and information requirements are set out in the Australia New Zealand Food Standards Code (FSC). Most food for sale in New Zealand must be comprehensively labelled. Where food products are not required to be fully labelled, some product information is still required.

Purpose of the Food Labelling Guide

The Guide has been designed to aid in the navigation, interpretation and application of the general food labelling standards in the FSC. It includes some product-specific and compositional requirements that affect food labelling and is intended to cover food for sale in New Zealand only. Since quantity marking such as net weight, volume or number of contents, is required on most packaged foods, the New Zealand Weights and Measures legislation requirements are also covered (in Section 2).

The Guide is mainly a series of step-by-step flowcharts that take a systematic approach to the key labelling standards (NOTE: In order to be systematic, flowcharts require questions be arranged in a sequence that ensures the correct conclusion is achieved. Often this means that the *least* likely outcome comes first in the sequence, which may not seem logical, eg, the first question in the flowchart may ask if your product is Royal Jelly or Infant Formula). Detailed explanatory information, interpretative guidance, and examples are also included to assist in the understanding of the FSC requirements.

The Guide should be used as a companion to the FSC and not as a substitute. It is intended for food manufacturers, caterers, retailers, consultants, and regulators.

How to use this Guide

1. Read instructions carefully.
2. The Guide should be read in conjunction with the FSC, including all amendments. You will need to refer to the FSC for any Tables or Schedules of the FSC referred to in this Guide. These Tables and Schedules are frequently updated, so it is important to check the latest Version of the Table/Schedule in the FSC – for access to an unofficial consolidated version of the FSC visit our website for a link to the FSC at: www.nzfsa.govt.nz. (You are advised to refer to the official legal document published in the Gazette for legal purposes). Please note that you must also check any amendments subsequent to the version of the FSC that is available online. These amendments can be found via the 'Gazette Notices' quick-link when you access the FSC from our website link.
3. Read Section 0: Introduction completely, then proceed to Section 1: Main Flow Diagram – Labelling Overview (at the 'Start' point indicated). This Main Flow Diagram covers the essential labelling requirements for foods that need to be **fully** labelled. From this diagram all other sections and flowcharts are referred to and related. For example:

- Section 2 covers the quantity marking requirements,
 - Section 3 determines whether or not your food has to be fully labelled with the essential labelling requirements,
 - Section 4 outlines the labelling and information required to be provided for those foods that are not required to be fully labelled,
 - Section 5 outlines those product-specific compositional and information requirements that directly affect labelling,
 - Section 6 covers the product identification labelling and legibility (eg, print size and placement) requirements.
4. Complete instructions and answer questions encountered and follow the yes / no direction **indicated by the arrows** accordingly (ie, follow the 'Yes' arrow to the next shape if your answer to the question is 'yes'. Conversely, follow the 'No' arrow if your answer is 'no'). DO NOT follow the numbers sequentially, UNLESS the arrows take you in that direction (the questions and instructions are Roman-numbered for reference purposes only). If the box is an instruction rather than a question, complete the instruction then just follow the direction of the arrow leaving the instruction to the next question or instruction (after completing the instruction).

If you do not know the answer to a question, you could:

- test both the YES and NO routes to see if it clarifies the question,
 - consult your ingredient supplier's technical representatives or a labelling consultant, or
 - consult your local Health Protection Officer.
5. Proceed to other sections as directed by the Main Flow Diagram. Work through each flowchart in the same manner as described above for the Main Flow Diagram (or follow the instructions provided where the section/part is not a flowchart ie, in Sections 5 and 12 and the Part 0 Introductions of Sections 8 and 11). Have the relevant pages from the Appendix 1: Glossary along-side the flowcharts/ instructions as you work through them. Appendix 1 provides the FSC-meanings of most of the words and terms included in the flowcharts and instructions. You should refer to Appendix 1 constantly to determine what each word or term used means in the context of the FSC labelling requirements. (The words appearing in italics in Appendix 1 are included to assist with interpretation and do not form part of the FSC definition. Some of these are Editorial Notes that, while appearing in the FSC, are for information only and are not legally binding). Some terms have been developed by NZFSA solely for the purposes of this labelling guide. The meanings of these terms are also given in Appendix 1. (These terms are identified in Appendix 1.) Notice that some words or terms apply generally to all sections of this labelling guide, whereas others apply only to specific sections.

6. Always read (and apply if appropriate) any notes and diagrams annotated on the flowcharts where these are attached to an arrow, or shape that you encounter en route through the flowchart. These will either be attached directly to a shape, or to the Yes/No on an arrow, or will be referenced (like a footnote) in bold red type (eg, **NB5** or **D1**).
7. After working through a section return to the next question or instruction in the Main Flow Diagram.
8. Record all relevant labelling decisions and instructions on the Section 15: Summary Checklist as you proceed through the flowcharts and instructions. Make a copy of the Section 15 Checklist form that you can write on first. NZFSA suggests you make changes to the checklist to suit your unique situation (eg, types of product and packaging, ingredients used, where/how products are sold). Start a new Section 15 Checklist for each (a) product, (b) layer of your product's packaging (see **NB2** in Section 3), and also (c) for each market/distribution type (eg, sold retail via supermarket chain, wholesale, or intra-company transfer – refer to the definitions in Appendix 1) ie, you should have a separate Section 15 Checklist for each different product that you produce, and each market/distribution-type for the product.

Notice that each 'Section' heading in the Section 15 Checklist relates to the corresponding flowchart or text instruction section in the main body of this Labelling Guide.

A fountain pen symbol*, will usually appear in the flowcharts to remind you to record the relevant decision or instruction.



NOTE: The number superscripts used throughout this Guide refer to the corresponding numbered item in the References section.

Related Food Legislation

You must consider your labelling in the context of all legislation that applies to food. Failure to do so could result in non-compliant labelling³¹. Refer to our website (www.nzfsa.govt.nz) for an in-depth explanation of food regulation in New Zealand, including fair trading, food safety requirements and the registration of food premises.

Further Information

NZFSA:

- Factsheets.
- Information Booklet for the Food Industry, Guide to Calculating the Shelf-life of Foods, February 2005.
- Identifying Food Additives Booklet Nov 2002.

www.nzfsa.govt.nz

FSANZ:

- User Guides and Factsheets
- Proposal P293 regarding Nutrition, Health and Related Claims.
- Code of Practice – Nutrient Claims in Food Labels and in Advertisements, January 1995

www.foodstandards.govt.nz

Ministry of Consumer Affairs Guidelines for Quantity Marking:

- Weigh In Measure Up (Consumer Information)
- Quantity Marking of Packaged Goods No. 1 (Business Factsheet – needs to be ordered under the 'Publications' and 'Publications Order Form' quick-links)
- Quantity Marking of Packaged Goods No. 2 (Business Factsheet – needs to be ordered under the 'Publications' and 'Publications Order Form' quick-links)
- Average Quantity System (Business Information)
- Retailers – a Guide on Weights and Measures (Business Info)

www.consumer-ministry.govt.nz

Commerce Commission:

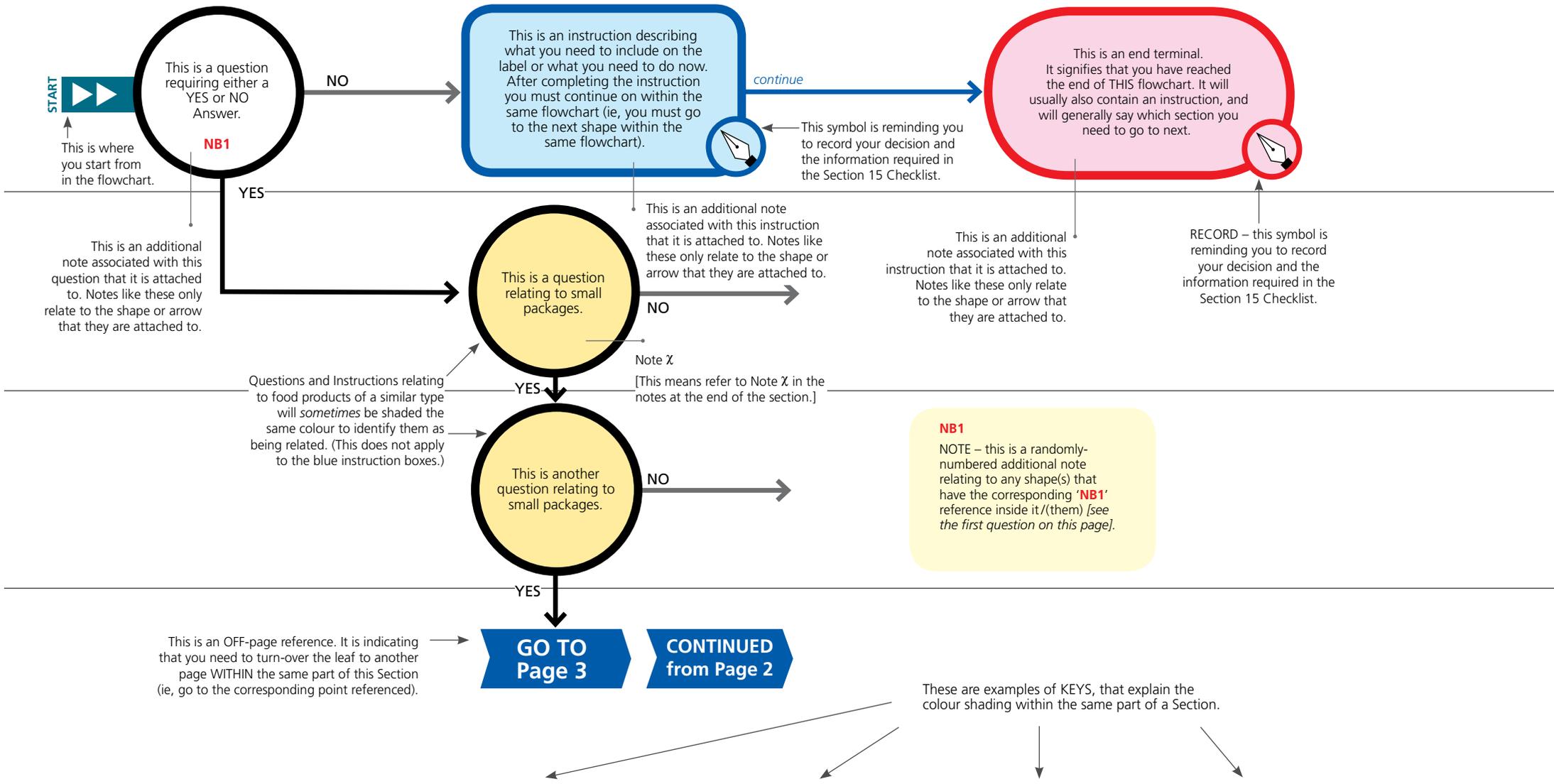
- 'Food Labelling, Promotion and Marketing' January 2000 guide for manufacturers, importers and retailers on the Fair Trading Act (at the time of printing this Labelling Guide the document was under review and is likely to be updated).
- 'Place of Origin' March 1999 guide for importers, manufacturers and retailers.

www.comcom.govt.nz

Environmental Risk Management Authority, New Zealand (ERMA New Zealand)
Ph: 04 916 2426

www.ermanz.govt.nz

Also refer to the [References Section](#).



Key to Abbreviations commonly used in this Guide:

- App = Appendix
- Ch = Chapter
- Cl = Clause
- Sec = Section
- Std = Standard

KEY:

Questions and instructions relating to	cereals
Questions and instructions relating to	fats/oils
Questions and instructions relating to	fish/crustacea/shell-fish
Questions and instructions relating to	starch
Questions and instructions relating to	sugar
Questions and instructions relating to	nuts

KEY:

- Questions and instructions relating to **'additives'**, including flavours, vitamins/minerals and enzymes
- Questions and instructions relating to **'Novel Food'**, ingredients

KEY:

- Questions relating to **added water** left in the product
- Questions relating to **sub-ingredients of compound ingredients**

KEY:

- Questions relating to **alcoholic beverages**

Contents

- Section 1** Labelling Overview
- Section 2** Quantity Marking
- Section 3** Labelling Requirement
- Section 4** Exempt Food - Retail/Catering
- Section 5** Product-Specific Labelling
- Section 6** Identification and Legibility
- Section 7** Warning and Declarations
- Section 8** Statement of Ingredients
- Section 9** Date Marking
- Section 10** Directions for Use and Storage
- Section 11** Nutrition Information
- Section 12** Percentage Labelling
- Section 13** Genetically Modified Food
- Section 14** Irradiated Food
- Section 15** Summary Checklist
- Appendices**

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Main Flow Diagram

– Labelling Overview

Version Control July 2007

Key to Section 1

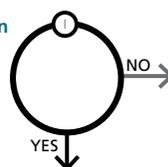
Where to start



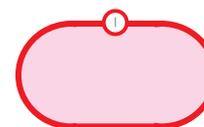
Record



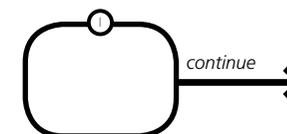
Question

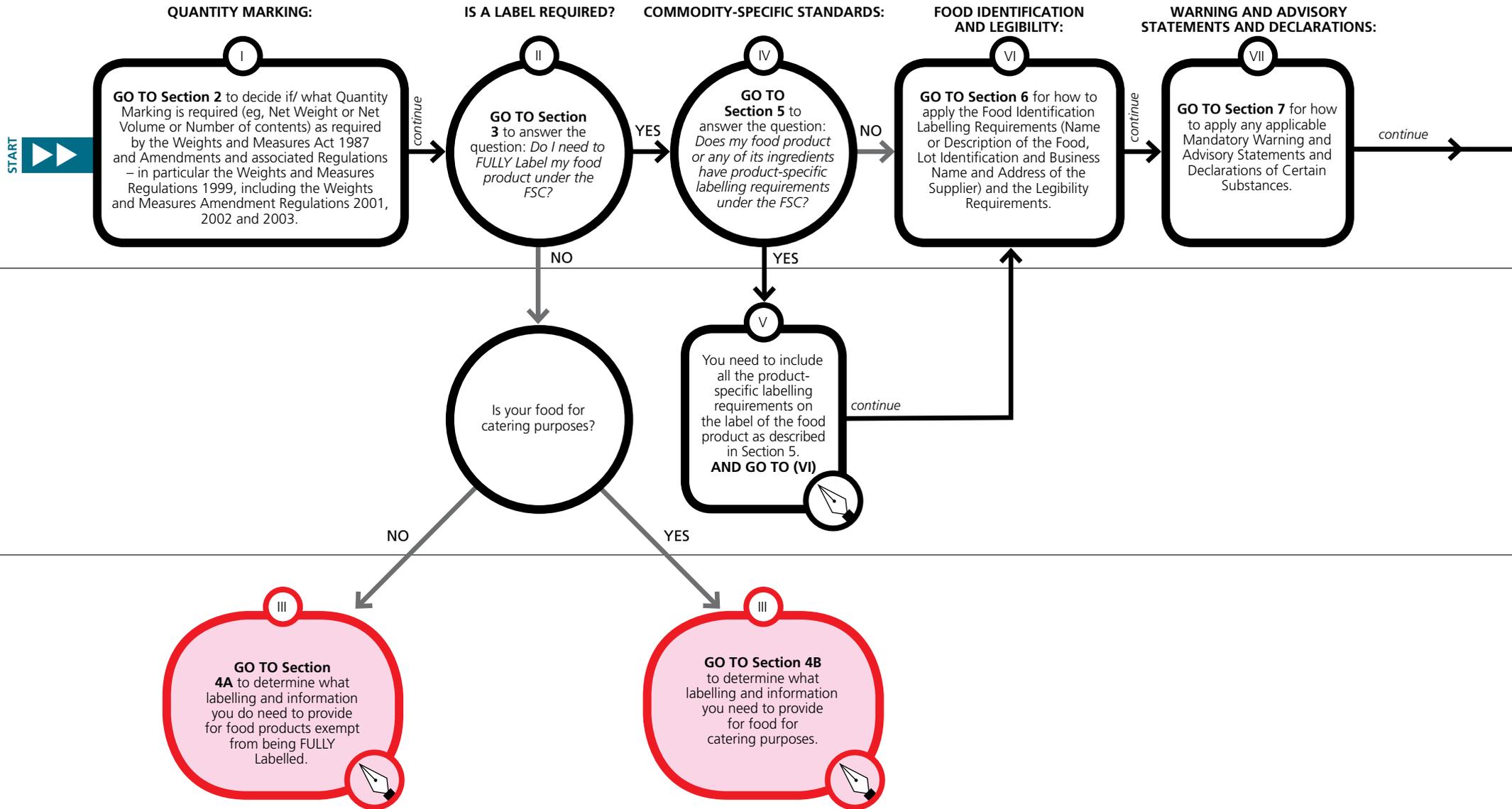


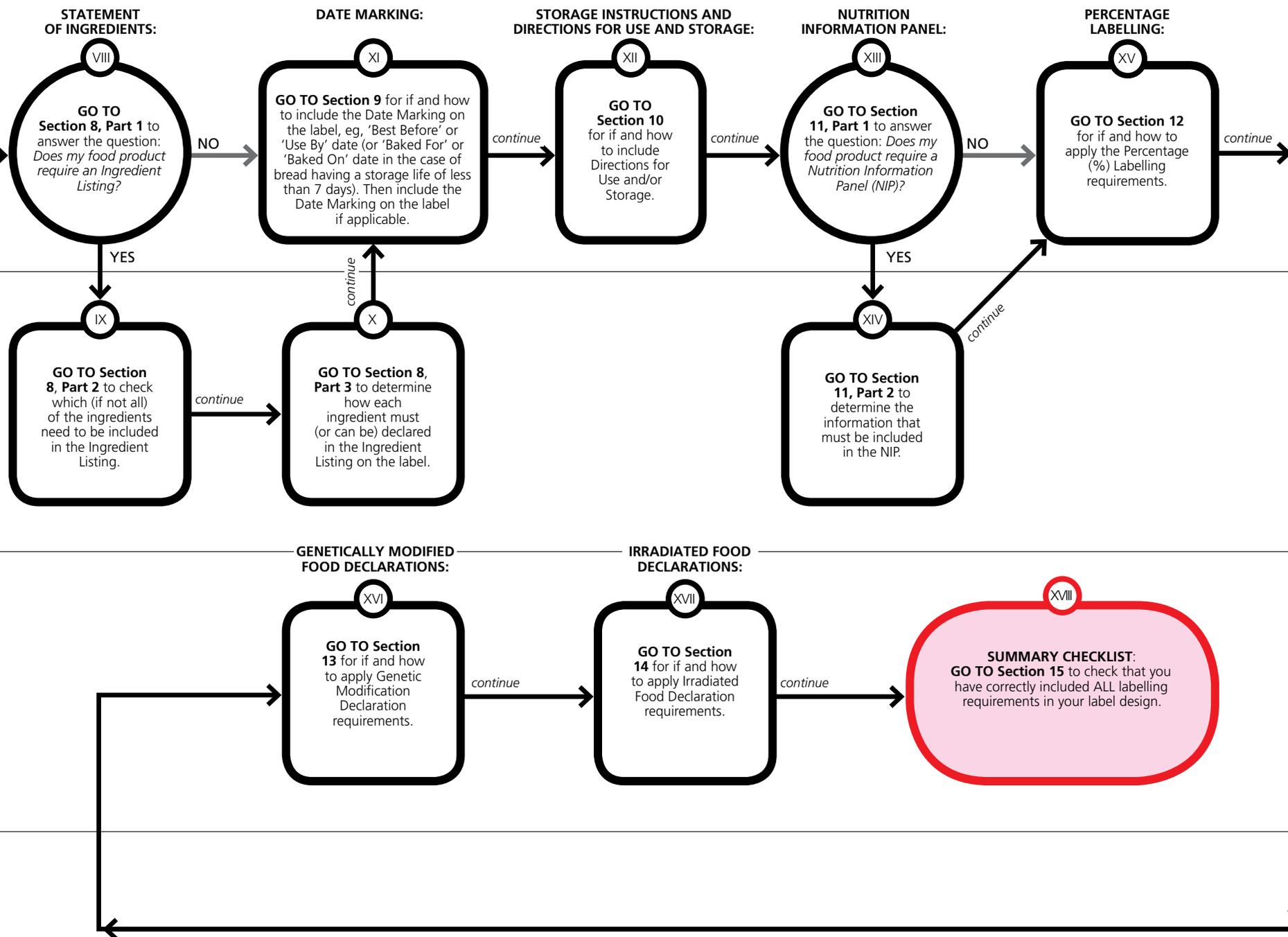
Signals the end of the flowchart (may also include an instruction)



Instruction







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Quantity Marking Requirements

– Weights and Measures Regulations 1999 and Amendments

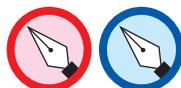
Version Control July 2007

Key to Section 2

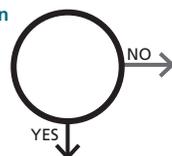
Where to start



Record



Question



Signals the end of the flowchart (may also include an instruction)

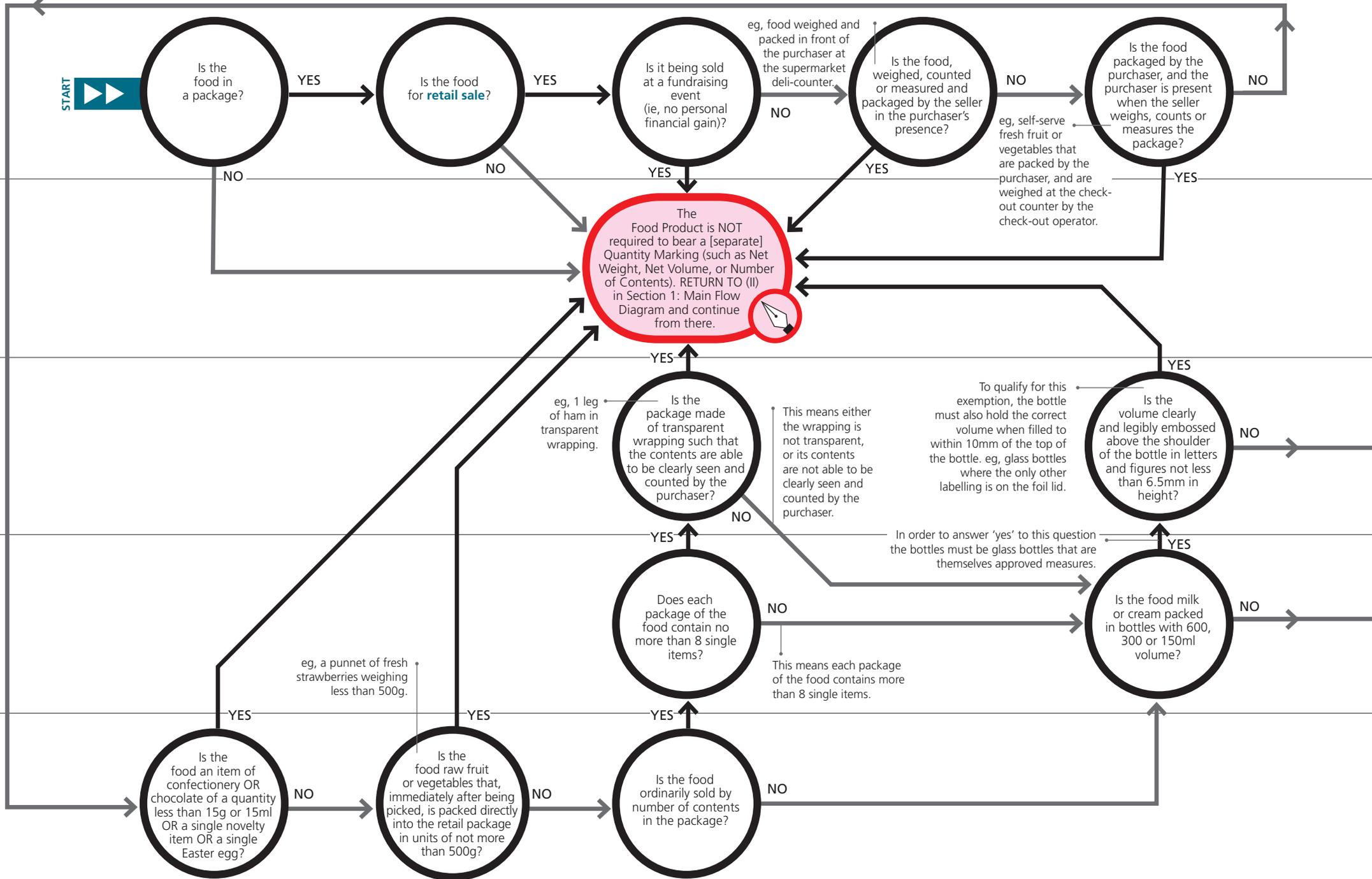


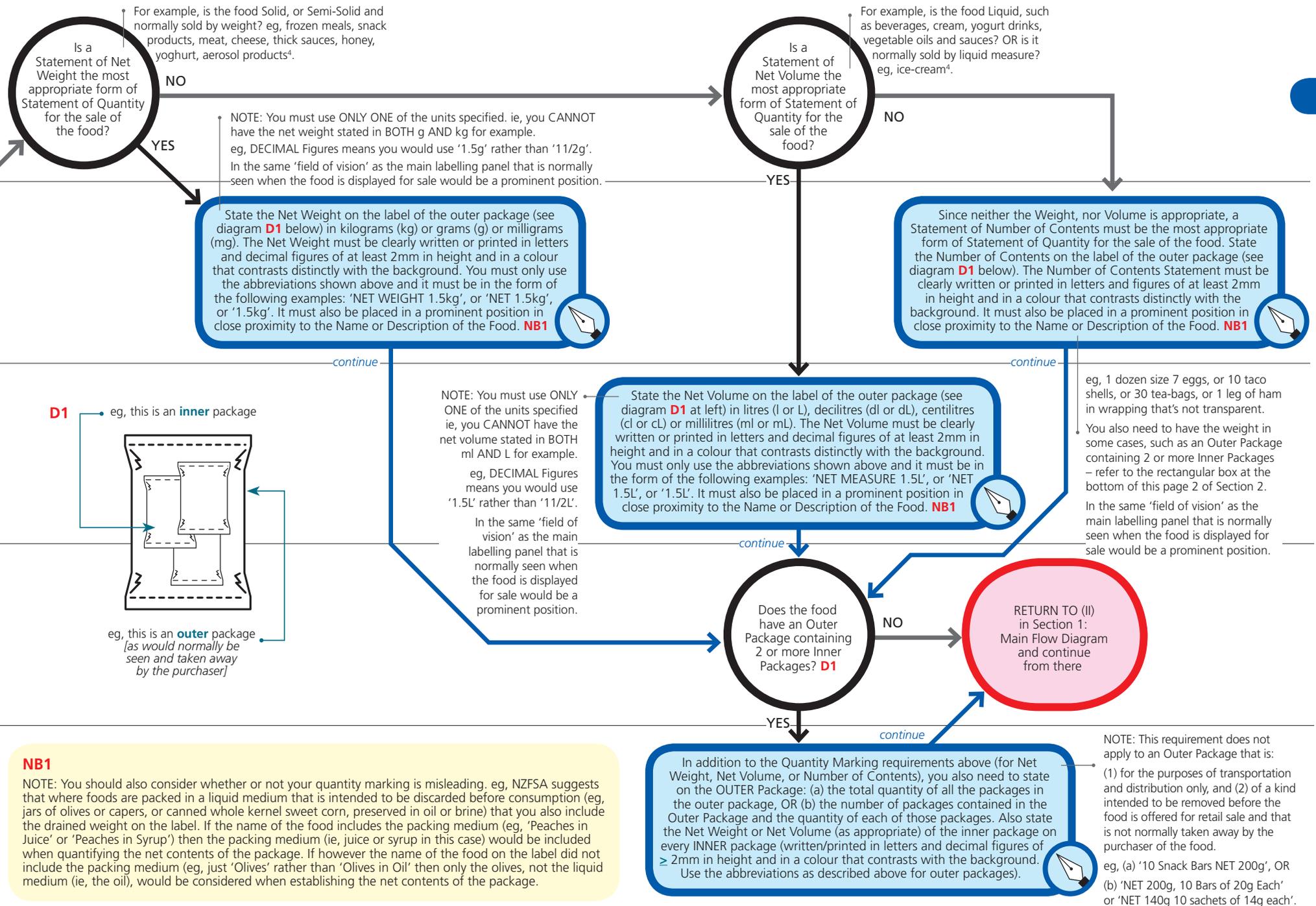
Instruction



Reference to a Supplementary note or diagram elsewhere on the page eg, NB1 or D1

NBX
DX





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Do I need to Fully Label my Food Product?

– Standard 1.2.1

Version Control May 2009

Key to Section 3

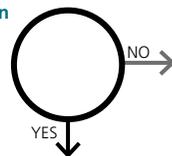
Where
to start



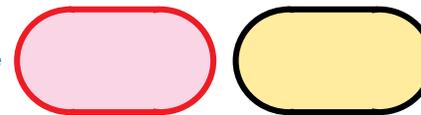
Record



Question



Signals the end
of the flowchart
(may also include
an instruction)



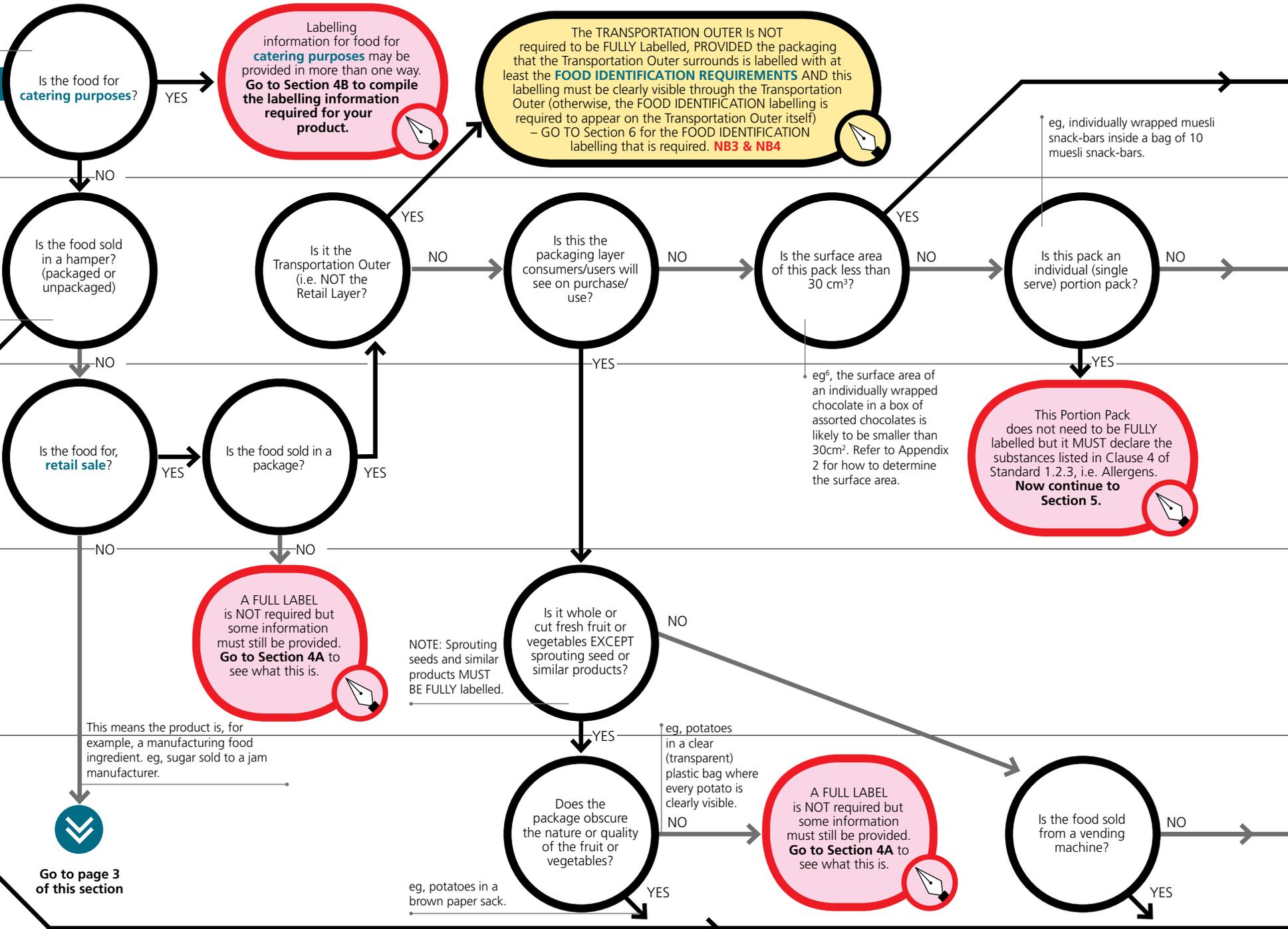
Reference to a
Supplementary
note or diagram
elsewhere on the
page eg, NB2 or D1

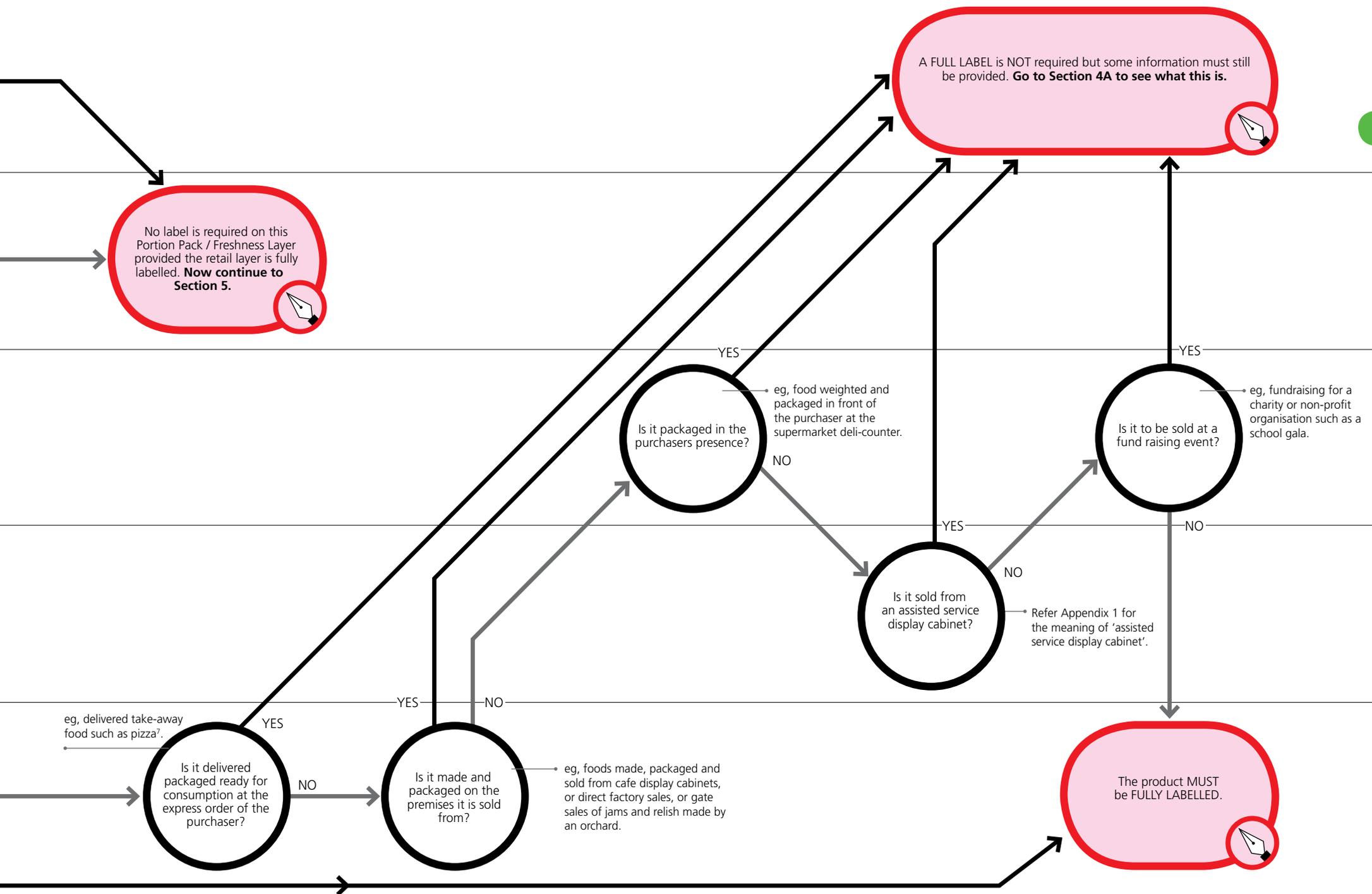
NBX
DX

Refer to Appendix 1 for the meaning of 'Retail Sale' and 'Food for Catering purposes'



NOTE: Unpackaged food in a hamper must be accompanied with documentation showing everything that would need to be on its label, if it had one. This can be within the hamper, or attached to the outside of the hamper. See Appendix 1 for definition of 'hamper' and 'package'.
NOTE: The hamper is NOT a package and therefore is not required to be labelled.

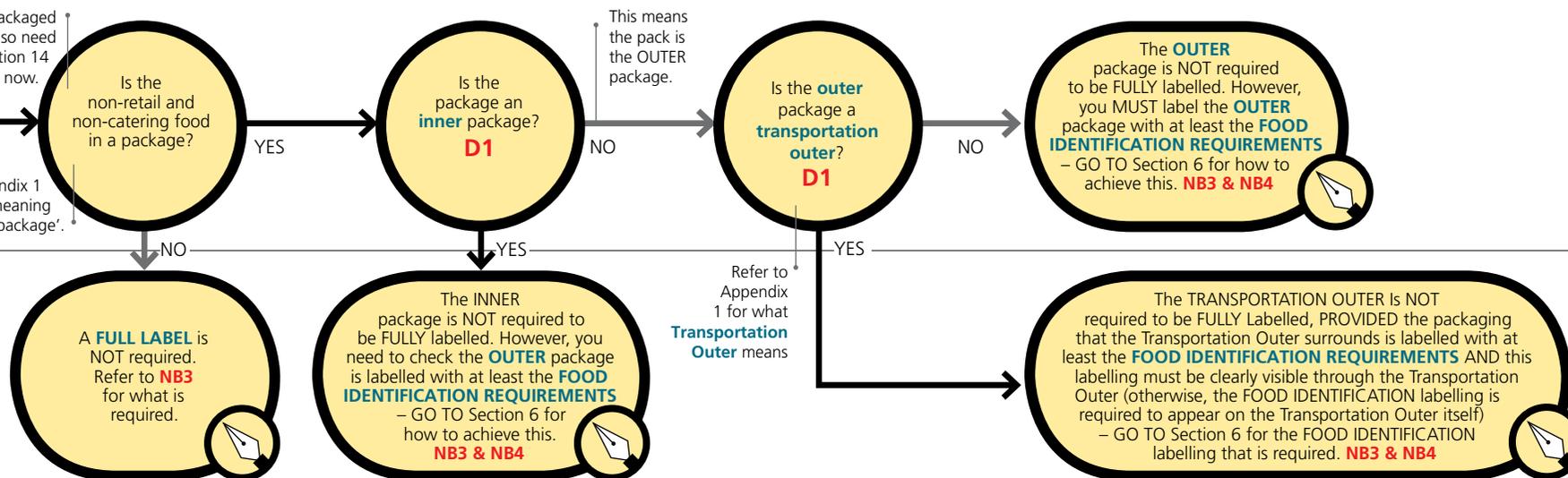




In the case of **non-retail** packaged **irradiated** foods you also need to complete the Section 14 flowchart. Do this now.



Refer to Appendix 1 for the meaning of 'package'.



KEY:



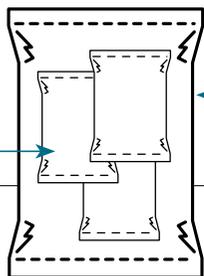
Questions relating to foods for **retail sale**



Questions and instructions relating to foods **NOT for retail sale** and **NOT for catering purposes**

D1

eg, this is an **inner** package⁵



eg, this is an **outer** package⁵
 [as would normally be seen and taken away by the purchaser]

NB2

If your product is for retail sale OR for catering purposes and has several layers of packaging, you need to complete this flowchart for each layer of packaging in turn to determine if you need to label that layer of packaging. Start with the outer-most layer. [For example, breakfast cereal packed in a sealed foil bag inside a cardboard box. You would first need to progress through the flow chart and apply the questions and instructions to the cardboard box to determine what labelling must be on the box. You would need next to go through the flowchart again, but this time apply the questions and instructions to the foil bag to decide what labelling (if any) must go on the foil bag.]

NB3

If requested, the food MUST be accompanied by sufficient information about it to enable the purchaser to check the product complies (or NZFSA to check that your product complies) with any FSC compositional or labelling requirements. The information must be in writing if so requested by the purchaser or NZFSA.

NB4

The Food Identification Requirements include: the Name or Description of the Food, Lot Identification and the Business Name and Address of the Supplier. For food safety reasons, NZFSA suggests that you also include on the label: (1) a Use By date if applicable (refer to Section 9) and (2) directions for use and storage (refer to section 10) and also (3) any of the common food allergens present in the product (refer to Section 7).



Section 4: What labelling and information do I need to provide for my food product which is exempt from being fully labelled?

Section 4 A Food for Retail Sale

Section 4 B Food for catering purposes

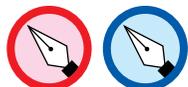
Version Control May 2009

Key to Section 4

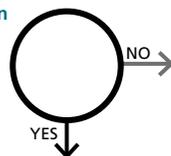
Where to start



Record



Question



Signals the end of the flowchart (may also include an instruction)



Instruction



Questions related to food containing polyols, isomalt or polydextrose



Reference to a Supplementary note elsewhere on the page eg, NB5

NBX

START

Regardless of any labelling exemptions granted by the FSC, NZFSA suggests that in order to help ensure product safety, you always at least include on a label attached to the product:

- (1) **The Food Identification Requirements** (Name or Description of the Food, Lot Identification and the Business Name and Address of the Supplier – refer to Section 6),
- (2) **A Use By Date** where the food should be consumed before a certain date for health and/or safety reasons (refer to Section 9),
- (3) **Directions for Use and Storage** (if needed for health/safety – refer to Section 10), and
- (4) Any of the Common **Food Allergens Present** in the Product (refer to Section 7).

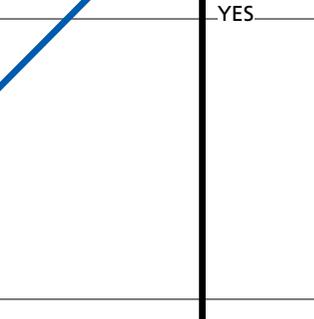
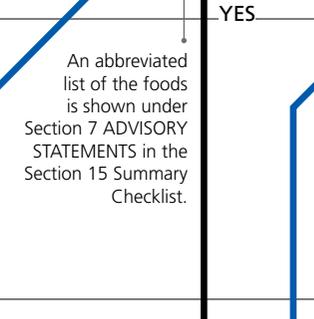
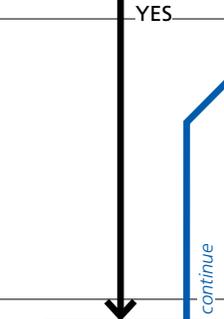
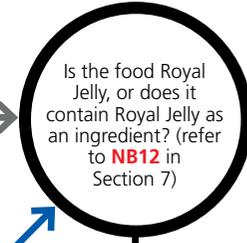
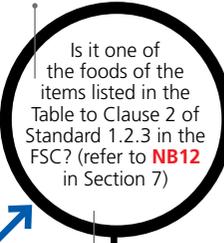
NOTE: This flowchart is only to be used for those **RETAIL** food products that are exempt from being **FULLY** labelled as determined by the Section 3 Flowchart.

The allergens are listed in the Table to Clause 4 of Standard 1.2.3, in the FSC.

continue



Refer to Standard 1.2.3 in the FSC itself for this Table.

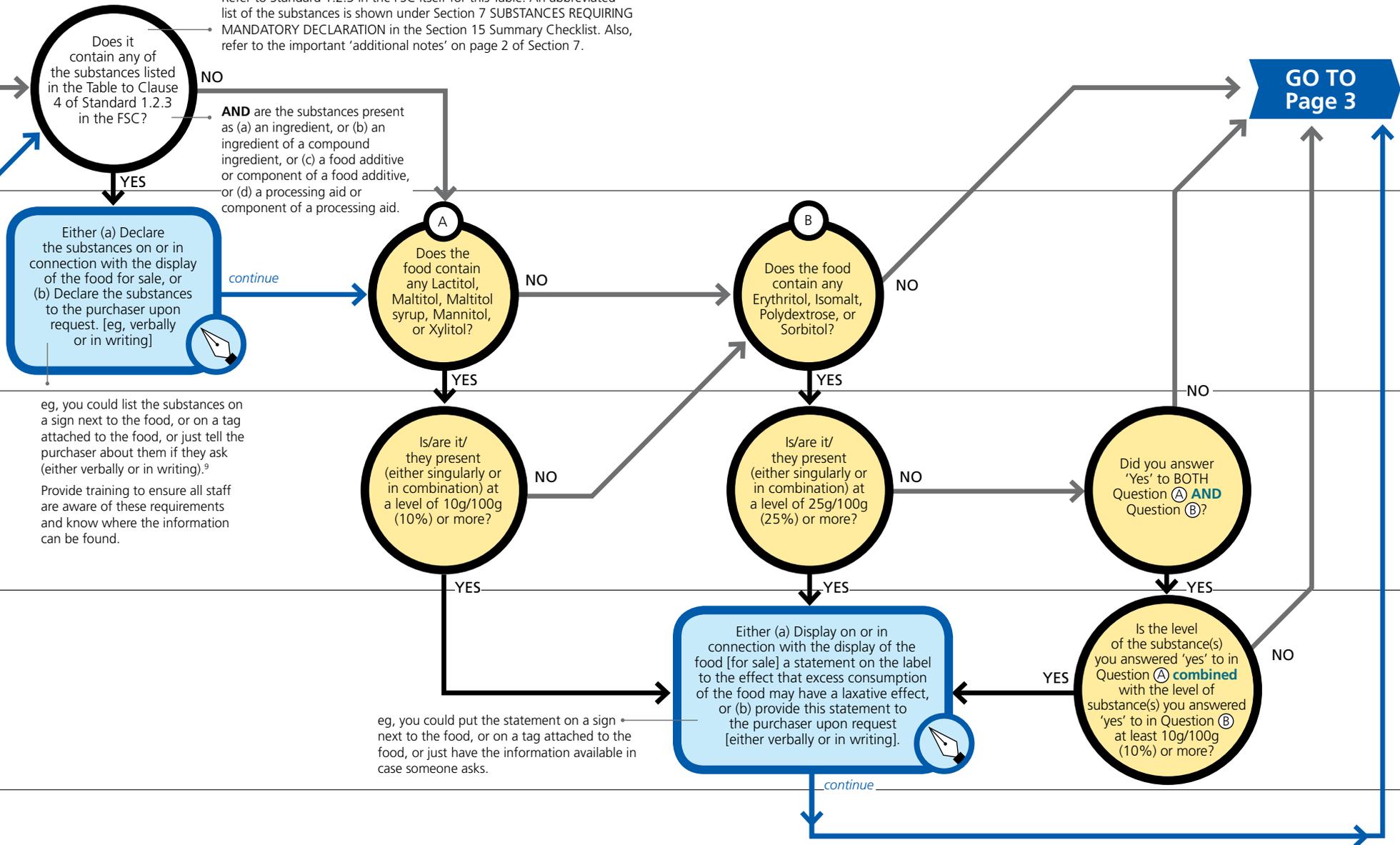


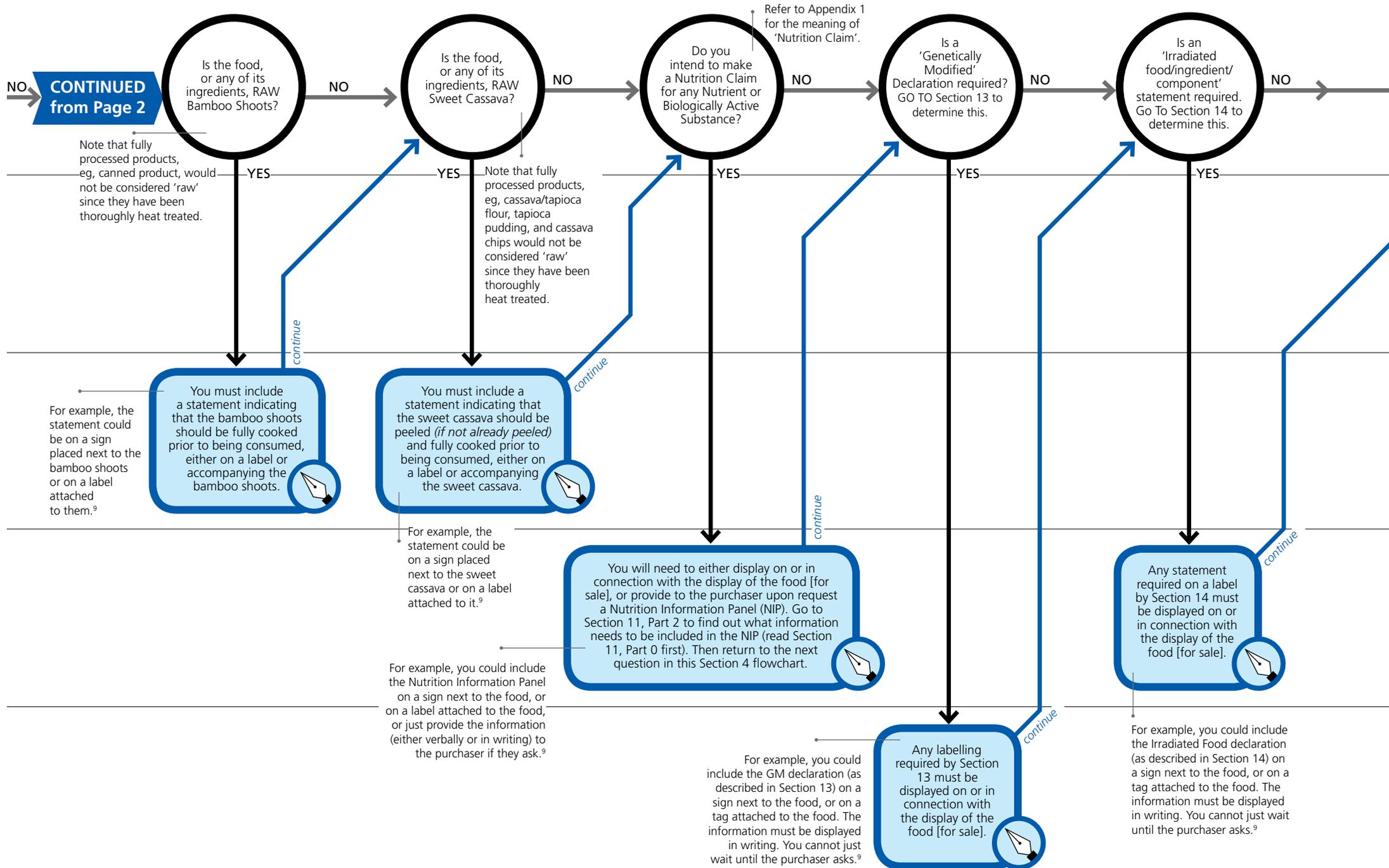
An abbreviated list of the foods is shown under Section 7 ADVISORY STATEMENTS in the Section 15 Summary Checklist.

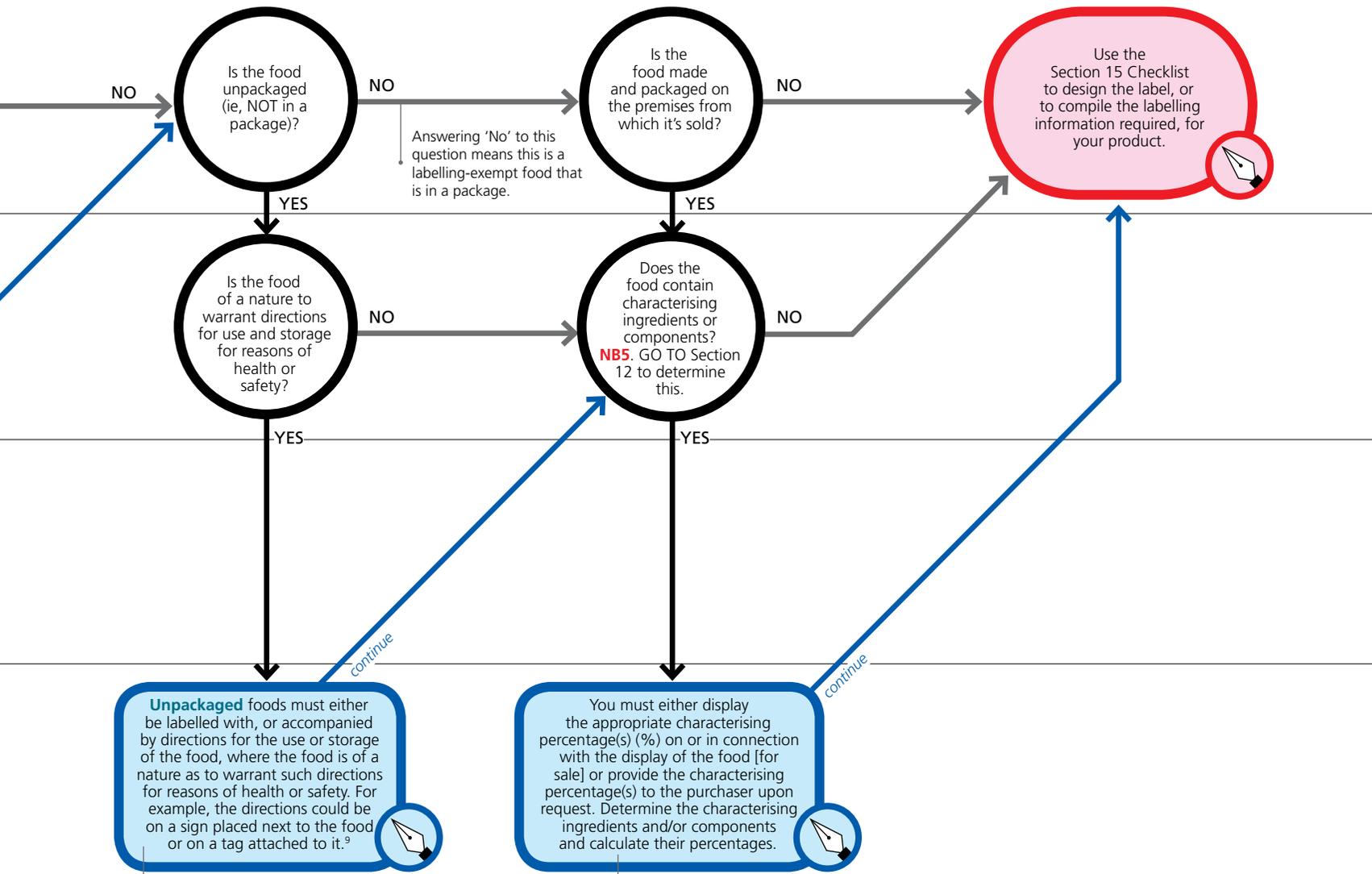
eg, the advisory statement could be placed on a sign next to the food, or on a tag attached to the food, or just given to the purchaser if they ask.⁹
Provide training to ensure all staff are aware of these requirements and know where the information can be found.
Refer to the Table to Clause 2 of Standard 1.2.3 in the FSC itself for the required advisory statement(s)

eg, the warning statement could be placed on a sign next to the food, or on a tag attached to the food. It must be provided in writing – you cannot just wait until a purchaser asks.⁹
The type size may be 1.5mm or more in the case of small packages (ie, those having a surface area of less than 100cm²)

Refer to Standard 1.2.3 in the FSC itself for this Table. An abbreviated list of the substances is shown under Section 7 SUBSTANCES REQUIRING MANDATORY DECLARATION in the Section 15 Summary Checklist. Also, refer to the important 'additional notes' on page 2 of Section 7.







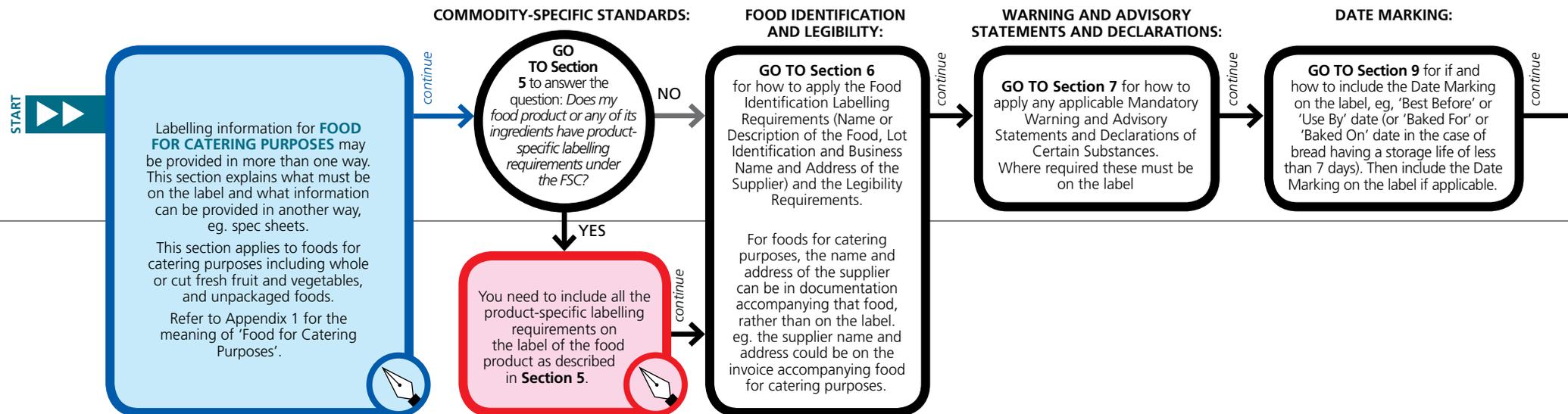
NB5
 NOTE: The following foods are NOT required to have characterising percentages declared (even when they are unpackaged or made and packaged on the premises from which they are sold):

- Single-category-of-ingredient or sole-ingredient foods, OR
- Food packaged in the presence of the purchaser (including food packed by the purchaser), OR
- Prepared filled rolls, sandwiches, bagels and similar products, OR
- Food sold at fund-raising events, OR
- Food in small packages (having a surface area of less than 100cm² which is about the size of two small (14g) boxes of raisins stacked on top of each other. Refer to Appendix 2 for how to determine the surface area of your package), OR
- Cured and/or dried meat flesh in whole cuts or pieces (refer to Appendix 1 for the definition of these products. eg, dry-cured ham or bacon having a relatively high meat content. Chemically preserved meat products, such as salted/pickled pork, that do not meet the minimum percentage meat compositional requirements (eg, those using non-meat 'fillers' and 'extenders') CANNOT be called Cured Meat, so they would not be exempt from the percentage labelling requirements), OR
- Alcoholic beverages as defined in Standards 2.7.2 to 2.7.5 inclusive in the FSC (including complying with compositional requirements), OR beverages containing at least 0.5% alcohol by volume that are NOT defined in Standards 2.7.2 to 2.7.5 inclusive, OR
- Infant formula products as defined in Standard 2.9.1 in the FSC (including complying with compositional requirements).

ALSO refer to Section 12 for an explanation of ingredients that would not be considered to be characterising (ie, Ingredients or category of ingredients used in small quantities for flavouring purposes; Ingredients or category of ingredients that, while mentioned in the food-name, would not govern the choice of the consumer, because the variation in the quantity is not essential to characterise the food, or does not distinguish the food from similar foods; and Ingredients already declared as a characterising component).

EXAMPLES: Raw foods which must be cooked before they can be consumed safely. Foods designed for immune-sensitive populations like infants and the elderly, who require especially hygienic handling. Chilled perishable foods which could become microbiologically unsafe if they are not stored correctly (eg, cooked chilled ready-to-eat products such as prepared meals, cold cuts of meat). Foods which have to be thoroughly reheated before they can be consumed safely.

For example, you could include the characterising percentages and corresponding ingredients and/or components on a sign next to the food, or on a tag attached to the food, or just have the percentage information available in case a purchaser asks.⁹



NOTE: You can use your retail label on foods for catering purposes. Return to Section 1 for information on developing retail labels.

STORAGE INSTRUCTIONS AND DIRECTIONS FOR USE AND STORAGE:

GO TO Section 10 for if and how to include Directions for Use and/or Storage.

continue

GENETICALLY MODIFIED FOOD DECLARATIONS:

GO TO Section 13 for if and how to apply Genetic Modification Declaration requirements.

continue

IRRADIATED FOOD DECLARATIONS:

GO TO Section 13 for if and how to apply Irradiated Foods Declaration requirements.

continue

REQUIREMENT TO PROVIDE ADDITIONAL INFORMATION

Has the purchaser or relevant authority requested all FSC compositional and labelling requirements provided?

YES

Prepare written documentation to accompany the food with the requirements from Section 8: Statement of Ingredients, Section 11: Nutrition Information panel, Section 12: Percentage Labelling

continue

NO

SUMMARY CHECKLIST:
GO TO Section 15 to check that you have correctly included ALL labelling requirements in your label design.

NOTE: Where food for catering purposes is not required to bear a label (eg, unpackaged food, whole or cut fresh fruit and vegetables (except sprouting seeds)) the food must be accompanied by documentation containing all the information required by this section.

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**Does my Food Product or any of its Ingredients
have Product-Specific Labelling Requirements?**
– Chapter 2 Standards

How to determine the Product-Specific Labelling Requirements

Foods listed in Column 2 of Table 1 have product-specific labelling requirements in Chapter 2 of the Australia New Zealand Food Standards Code (FSC). These requirements are in addition to the general labelling requirements outlined in the Part 1.2 Standards in Chapter 1 of the FSC. The requirements apply to both the particular food itself and when the particular food is used as an ingredient in foods for retail sale or for catering purposes. For example, honey is a prescribed name, so if your product was honey you must use the name 'honey' as the name of the food. If you were just using honey as an ingredient in your product, you must refer to it as 'honey' in the Ingredient Listing on your label. Check Column 2 in Table 1 to see if your food product, or any of its ingredients, is/are included and then follow the corresponding instructions given in Columns 3 or 4 of the table accordingly. For foods for retail sale or catering purposes that are required to be fully labelled (as determined by Section 3 of this labelling guide), follow the corresponding instructions given for the particular food in Column 3 of Table 1. Similarly, for foods for retail sale or for catering purposes that are exempt from being fully labelled (as determined by Section 3), follow the corresponding instructions given for the particular food in Column 4 of Table 1.

There are also some product-specific requirements in Standard 1.2.3 of the FSC, but these are covered by Section 7 of this labelling guide (eg, raw egg requires an advisory statement).

Remember this is only a guide. Ensure you also refer to the relevant Chapter 2 Standard in the FSC as referenced in Column 1 of Table 1 to check the actual legal requirements and the legal meanings of terms used, and compositional requirements. Also, **refer to Appendix 1 of this labelling guide to check the meaning of the words used to describe the foods in Column 2.** The Glossary in Appendix 1 also contains some (*but not all*) compositional requirements for some food products in their definition, eg, **Cured and/or Dried Meat Flesh in Whole Cuts or Pieces** (eg, leg, of ham, sliced bacon) means meat flesh including any attached bone containing no less than 160g/kg meat protein on a fat free basis.

Record all applicable instructions in the Section 15 Checklist.

Table 1 – Summary of Product-Specific Labelling Requirements specified in Chapter 2 of the FSC¹⁰

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
MEAT AND MEAT PRODUCTS (Standard 2.2.1):			
Standard 2.2.1 Clause 4(1)	Brain, heart, kidney, liver, tongue or tripe offal (Refer to the definitions in Appendix 1).	Declare on the label either by the class name, offal ; or by the specific name of the offal.	You must inform the purchaser what it is, either by the class name, offal ; or by the specific name of the offal. <i>[eg, this can be done either verbally or in writing, but you must proactively offer the information to all purchasers ie, not just when asked].</i>
Standard 2.2.1 Clause 4(3)	Offal other than brain, heart, kidney, liver, tongue or tripe (Refer to the definitions in Appendix 1).	Declare the specific name of the offal on the label.	You must inform the purchaser of the specific name of the offal. <i>[eg, this can be done either verbally or in writing, but you must proactively offer the information to all purchasers ie, not just when asked].</i>
Standard 2.2.1 Clause 5	Minced meat – where express or implied reference is made in relation to the fat content. <i>eg, lean mince</i>	Declare the maximum proportion of fat in the minced meat (expressed in g/100g) on the label.	Either display on or in connection with the display of the food [for sale]; or provide to the purchaser upon request: the maximum proportion of fat in the minced meat (expressed in g/100g). <i>[eg, you could attach a label to the food or display a sign near the food with the information on it, or have the information available so that purchasers can be given it either verbally or in writing if they ask].</i>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.2.1 Clause 6	Raw meat which has been formed or joined into the semblance of a cut of meat using a binding system without the application of heat, whether coated or not.	Declare on the label that the meat is either formed or joined, in conjunction with cooking instructions indicating how the microbiological safety of the product can be achieved.	You must inform the purchaser that the meat is either formed or joined, and provide cooking instructions indicating how the microbiological safety of the product can be achieved. <i>[eg, this can be done either verbally or in writing, but you must proactively offer the information to all purchasers ie, not just when asked].</i>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.2.1 Clause 8 and 10	Fermented Comminuted Processed Meat (Refer to the definition in Appendix 1). This is a Prescribed NAME. [eg, salami containing at least 300g/kg (30%) meat].	Include on the label, as the <i>Name of the Food</i> , the prescribed name (ie, one of the following as appropriate depending on whether the product has been heat treated or cooked or is NOT heat treated or cooked): ‘fermented processed meat – heat treated’ [in the case of fermented comminuted processed meat which has been heat treated]; OR ‘fermented processed meat – cooked’ [in the case of fermented comminuted processed meat which has been cooked]; OR	Only if the product is unpackaged , display one of the following prescribed names (as appropriate) in connection with the food for sale <i>[eg, on a sign next to the food or a tag attached to the food]: –</i> ‘fermented processed meat – heat treated’ <i>[in the case of fermented comminuted processed meat which has been heat treated];</i>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
	Fermented Comminuted Processed Meat [CONTINUED]	‘fermented processed meat – not heat treated’ [in the case of fermented comminuted processed meat which has NOT been heat treated or cooked]. ALSO , if the label has a trade name on it, that trade name must have in association therewith (ie, next to the trade name on the label) the following word or words (as appropriate depending on whether the product has been heat treated or cooked or is NOT heat treated or cooked): – ‘fermented heat treated’ [in the case of fermented comminuted processed meat which has been heat treated]; OR ‘fermented cooked’ [in the case of fermented comminuted processed meat which has been cooked]; OR ‘fermented’ [in the case where it has NOT been heat treated or is NOT cooked]. ALSO , except for the required use of the words ‘not heat treated’; ‘heat treated’ or ‘cooked’ as outlined above, do not refer to any heating process on the label unless the heating process is a cooking instruction for the consumer. <i>[eg, do not use words such as ‘pasteurised’ or words or similar meaning anywhere on the label]</i>	OR ‘fermented processed meat – cooked’ <i>[in the case of fermented comminuted processed meat which has been cooked];</i> OR ‘fermented processed meat – not heat treated’ <i>[in the case of fermented comminuted processed meat which has not been heat treated or cooked].</i> [NOTE: In the case of the food that is NOT heat treated or NOT cooked, the words ‘not heat treated’ may be omitted]. If the food is labelled voluntarily , proceed as shown in Column 3 at left.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.2.1 Clause 9 and 10	Fermented Comminuted Manufactured Meat (Refer to the definition in Appendix 1). This is a Prescribed NAME. [eg, salami containing relatively little amounts of non-meat ingredients so that it contains at least 660g/kg (66%) meat].	<i>Labelling for Fermented comminuted Manufactured Meat is the same as for Fermented Comminuted Processed Meat (as shown above),</i> EXCEPT replace the word: 'processed' with the word: 'manufactured' .	<i>For unpacked product only, proceed as shown in Column 4 above for Fermented Comminuted Processed Meat,</i> EXCEPT replace the word: 'processed' with the word: 'manufactured' .
FISH AND FISH PRODUCTS (Standard 2.2.3):			
Standard 2.2.3 Clause 3	Raw fish which has been formed or joined into the semblance of a cut or fillet of fish using a binding system without the application of heat, whether coated or not.	Declare on the label that the fish is either formed or joined, in conjunction with cooking instructions indicating how the microbiological safety of the product can be achieved.	You must inform the purchaser that the fish is either formed or joined, and provide cooking instructions indicating how the microbiological safety of the product can be achieved. <i>[eg, this can be done either verbally or in writing, but you must proactively inform all purchasers ie, not just when asked].</i>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
EDIBLE OILS (Standard 2.4.1):			
Standard 2.4.1 Clause 3	Edible Oil that has undergone any process which has been used to alter the fatty acid composition. <i>eg, hydrogenation</i>	Where the specific name of the oil is used on the label [eg, <i>sunflower seed oil; or avocado oil; or coconut oil; rather than just vegetable oil</i>], include on the label a statement that describes the process which has been used to alter the fatty acid composition of the edible oil [for example, <i>'sunflower seed oil (partially hydrogenated)'; or 'hydrogenated coconut oil'</i>].	<i>Not Applicable</i>
FRUIT JUICE AND VEGETABLE JUICE (Standard 2.6.1):			
Standard 2.6.1 Clause 3	Fruit or Vegetable Juice Blends (Refer to the definition in Appendix 1).	Include on the label – (a) the names of each juice present in the blend; AND (b) the percentage by volume of each juice present in the blend. EXCEPTION: – this requirement does not apply to orange juice which contains no more than 10% in total of – (a) mandarin juice; OR (b) tangelo juice; OR (c) both mandarin AND tangelo juice.	<i>Not Applicable.</i>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
NON-ALCOHOLIC BEVERAGES AND BREWED SOFT DRINKS (Standard 2.6.2):			
Standard 2.6.2 Clause 5	Non-alcoholic Beverages (Refer to the definition in Appendix 1).	Non-alcoholic beverages must not be labelled or otherwise presented for sale in a form which expressly or by implication suggests that the product is an alcoholic beverage.	Non-alcoholic beverages must not be labelled or otherwise presented for sale in a form which expressly or by implication suggests that the product is an alcoholic beverage.
Standard 2.6.2 Clause 7 and 8	Electrolyte Drinks and/ or Electrolyte Drink Bases (Refer to the definition in Appendix 1).	<p>Include on the label a declaration, as 'ready to drink' –</p> <p>(a) the average per 100mL – (i) energy value; AND (ii) total carbohydrate present, including each type of monosaccharide and disaccharide; AND (iii) milligrams and millimoles of the ADDED minerals and electrolytes; AND</p> <p>(b) the recommended volume and frequency of use.</p> <p><i>[NOTE: When determining the values to be included in the above declaration on the label, it should be done on the basis that the water added to the electrolyte drink base, to make up the electrolyte drink does not contribute to the declared values.]</i></p> <p>Where a claim is made that the electrolyte drink is isotonic, hypertonic or hypotonic, declare on the label the osmolality of the electrolyte drink, as measured in milliOsmol/L. [NOTE: This claim may only be made for drinks with an average osmolality of 250 – 340 milliOsmol/L].</p>	<i>Not Applicable.</i>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
KAVA (Standard 2.6.3):			
Standard 2.6.3 Clause 3	<p>Kava (Refer to the definition in Appendix 1. Notice that the definition includes BOTH (a) the beverage obtained by cold water extraction; and (b) the dried or fresh form).</p> <p>NOTE: Kava is not permitted to be used as an ingredient in any food product, unless the product is sold as a dietary supplement regulated under the <i>Dietary Supplement Regulations (1985)</i>.</p>	<p>Include on the label (or attached to the package containing the kava) the following warning statements –</p> <p>(a) 'Use in moderation'; AND</p> <p>(b) 'May cause drowsiness'</p> <p>NOTE: <i>The above warning statements must be in a size of type of not less than 3mm; or in the case of a small package (having a surface area of less than 100cm²), in a type size of not less than 1.5mm. Also, you must use the exact words shown.</i></p>	<p>When the Kava (<i>dried or fresh form</i>) is unpackaged, display on or in connection with the display [for sale] of the kava the following – (a) the name and business address in Australia or New Zealand [as appropriate] of the supplier of the kava; AND</p> <p>(b) the warning statements–</p> <p>(i) 'Use in moderation'; AND</p> <p>(ii) 'May cause drowsiness'</p> <p>NOTE: <i>The above warning statements must be in a size of type of not less than 3mm and you must use the exact words shown.</i></p>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled																																																																																						
FORMULATED CAFFEINATED BEVERAGES (eg, Energy Drinks) (Standard 2.6.4):																																																																																									
Standard 2.6.4 Clause 3	Formulated Caffeinated Beverage (Refer to the definition in Appendix 1). [Since this food requires specialised labelling information, it is especially important that you refer to Standard 2.6.4 in the FSC].	<p>You must include on the label declarations of the average quantities, per serving size and per 100mL of –</p> <p>(a) caffeine, expressed in milligrams; AND</p> <p>(b) the following substances, where present, expressed in the corresponding units as indicated below –</p> <table border="1" data-bbox="521 421 1520 743"> <thead> <tr> <th>Substance</th> <th>Maximum amount per one-day quantity</th> </tr> </thead> <tbody> <tr><td>• Thiamin</td><td>40mg</td></tr> <tr><td>• Riboflavin</td><td>20mg</td></tr> <tr><td>• Niacin</td><td>40mg</td></tr> <tr><td>• Vitamin B₆</td><td>10mg</td></tr> <tr><td>• Vitamin B₁₂</td><td>10µg</td></tr> <tr><td>• Pantothenic acid</td><td>10mg</td></tr> <tr><td>• Taurine</td><td>2000mg</td></tr> <tr><td>• Glucuronolactone</td><td>1200mg</td></tr> <tr><td>• Inositol</td><td>100mg</td></tr> </tbody> </table> <p>These declarations outlined above may be adjacent to or follow the nutrition information panel on the label, provided that the declarations are clearly distinguished from the nutrition information required by Standard 1.2.8. (Refer to Section 11 of this labelling guide). For example:</p> <table border="1" data-bbox="521 852 1444 1453"> <thead> <tr> <th colspan="3">NUTRITION INFORMATION</th> </tr> </thead> <tbody> <tr> <td colspan="3">Servings per package: 1</td> </tr> <tr> <td colspan="3">Serving size: 250ml</td> </tr> <tr> <td></td> <td>Ave Quantity per Serving</td> <td>Ave Quantity per 100mL</td> </tr> <tr> <td>Energy</td> <td>kJ (Cal)</td> <td>kJ (Cal)</td> </tr> <tr> <td>Protein</td> <td>g</td> <td>g</td> </tr> <tr> <td>Fat, total</td> <td>g</td> <td>g</td> </tr> <tr> <td>- saturated</td> <td>g</td> <td>g</td> </tr> <tr> <td>Carbohydrate</td> <td>g</td> <td>g</td> </tr> <tr> <td>- sugars</td> <td>g</td> <td>g</td> </tr> <tr> <td>Sodium</td> <td>mg (mmol)</td> <td>mg (mmol)</td> </tr> <tr> <th colspan="3">COMPOSITION INFORMATION</th> </tr> <tr> <td>Caffeine</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Thiamin</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Riboflavin</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Niacin</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Vitamin B₆</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Vitamin B₁₂</td> <td>µg</td> <td>µg</td> </tr> <tr> <td>Pantothenic acid</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Taurine</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Glucuronolactone</td> <td>mg</td> <td>mg</td> </tr> <tr> <td>Inositol</td> <td>mg</td> <td>mg</td> </tr> </tbody> </table> <p>[CONTINUED PAGE 6]</p>	Substance	Maximum amount per one-day quantity	• Thiamin	40mg	• Riboflavin	20mg	• Niacin	40mg	• Vitamin B ₆	10mg	• Vitamin B ₁₂	10µg	• Pantothenic acid	10mg	• Taurine	2000mg	• Glucuronolactone	1200mg	• Inositol	100mg	NUTRITION INFORMATION			Servings per package: 1			Serving size: 250ml				Ave Quantity per Serving	Ave Quantity per 100mL	Energy	kJ (Cal)	kJ (Cal)	Protein	g	g	Fat, total	g	g	- saturated	g	g	Carbohydrate	g	g	- sugars	g	g	Sodium	mg (mmol)	mg (mmol)	COMPOSITION INFORMATION			Caffeine	mg	mg	Thiamin	mg	mg	Riboflavin	mg	mg	Niacin	mg	mg	Vitamin B ₆	mg	mg	Vitamin B ₁₂	µg	µg	Pantothenic acid	mg	mg	Taurine	mg	mg	Glucuronolactone	mg	mg	Inositol	mg	mg	<p>Either display on or in connection with the display of the food [for sale]; OR provide to the purchaser upon request, advisory statements to the effect that –</p> <p>(a) the food contains caffeine; AND</p> <p>(b) the food is not recommended for –</p> <p>(i) children; and</p> <p>(ii) pregnant or lactating women; and</p> <p>(iii) individuals sensitive to caffeine.</p> <p>ALSO, Where the formulated caffeinated beverage contains one or more of the substances listed in the bullet point list shown in Column 3 at left you must include (<i>either displayed on or in connection with the display of the food [for sale]; OR provided to the purchaser upon request</i>) an advisory statement to the effect that –</p> <p>‘Consume no more than [amount of one-day quantity (as cans, bottles or mL)] per day’.</p> <p>(Refer to Appendix 1 for the meaning of ‘one-day quantity’).</p> <p>[you may choose your own wording for the advisory statements above provided the same meaning is achieved.]</p> <p>You must calculate the ‘one-day quantity’ based on the permission limits for the added substances shown in the bullet-point list at above left. Refer to the editorial note in Standard 2.6.4 in the FSC for how to do this calculation.</p> <p>[CONTINUED PAGE 6]</p>
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Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
	Formulated Caffeinated Beverage [Continued]	<p>You must also include on the label advisory statements to the effect that –</p> <ul style="list-style-type: none"> (a) the food contains caffeine; AND (b) the food is not recommended for – (i) children; and (ii) pregnant or lactating women; and (iii) individuals sensitive to caffeine. <p>Where the formulated caffeinated beverage contains one or more of the substances listed in bullet point list above you must include an advisory statement to the effect that –</p> <p>‘Consume no more than [amount of one-day quantity (as cans, bottles or mL)] per day’.</p> <p><i>(Refer to Appendix 1 for the meaning of ‘one-day quantity’).</i></p> <p><i>[you may choose your own wording for the advisory statements above provided the same meaning is achieved.]</i></p> <p>You must calculate the ‘one-day quantity’ based on the permission limits for the added substances shown in the bullet-point list above. Refer to the editorial note in Standard 2.6.4 in the FSC for how to do this calculation.</p> <p>NOTE: A formulated caffeinated beverage is NOT a ‘claimable food’ as defined in Standard 1.3.2 regarding vitamin and mineral claims. Consequently, you must NOT include any reference to vitamins or minerals on the label or in advertising, except where expressly required as described above. In addition, you must NOT include any declarations of the quantities of vitamins present in the beverage expressed as a proportion of the</p> <ul style="list-style-type: none"> (a) Recommended Dietary Intakes (ie, %RDI); OR (b) Estimated Safe and Adequate Daily Dietary Intakes (ie, %ESADDI); of that vitamin. 	<p>NOTE: A formulated caffeinated beverage is NOT a ‘claimable food’ as defined in Standard 1.3.2 regarding vitamin and mineral claims. Consequently, you must NOT include any reference to vitamins or minerals in association with the sale of the beverage (eg, on labels, signs or other advertising), including declarations of the quantities of vitamins present in the beverage expressed as a proportion of the</p> <ul style="list-style-type: none"> (a) Recommended Dietary Intakes (ie, %RDI); OR (b) Estimated Safe and Adequate Daily Dietary Intakes (ie, %ESADDI); of that vitamin. <p>(ie, you must not make any declarations of this type).</p>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled														
ALCOHOLIC BEVERAGES AND FOOD CONTAINING ALCOHOL (Part 2.7: Standards 2.7.1 – 2.7.5):																	
Standard 2.7.1 Clause 2	All Alcoholic Beverages and Foods containing Alcohol	<p>Include on the label of the food listed in Column 1 in the table below a statement of the alcohol content in the corresponding form specified in Column 2 of the table:</p> <table border="1" data-bbox="521 400 1641 699"> <thead> <tr> <th data-bbox="521 400 1037 440">Column 1</th> <th data-bbox="1037 400 1641 440">Column 2</th> </tr> </thead> <tbody> <tr> <td data-bbox="521 440 1037 547">Food, including alcoholic beverages, containing more than 1.15% alcohol by volume</td> <td data-bbox="1037 440 1641 547">Expressed in mL/100g or mL/100mL or X% ALCOHOL BY VOLUME or words and expressions of the same or similar effect</td> </tr> <tr> <td data-bbox="521 547 1037 699">Alcoholic beverages containing not more than 1.15% alcohol by volume Beverages containing no less than 0.5% alcohol by volume</td> <td data-bbox="1037 547 1641 699">'CONTAINS NOT MORE THAN X% ALCOHOL BY VOLUME' or words and expressions of the same or similar effect.</td> </tr> </tbody> </table> <p>The statement required as outlined above must, for the foods specified in Column 1 in the table below, be accurate to within the limits specified in Column 2 of the table below:</p> <table border="1" data-bbox="521 794 1641 1019"> <thead> <tr> <th data-bbox="521 794 1382 834">Column 1</th> <th data-bbox="1382 794 1641 834">Column 2</th> </tr> </thead> <tbody> <tr> <td data-bbox="521 834 1382 879">Beer, cider and perry</td> <td data-bbox="1382 834 1641 879">0.3% alc/vol</td> </tr> <tr> <td data-bbox="521 879 1382 948">Spirits, liqueurs, fortified wine, fortified fruit or vegetable wine, and all other alcoholic beverages containing more than 1.15% alcohol by volume</td> <td data-bbox="1382 879 1641 948">0.5% alc/vol</td> </tr> <tr> <td data-bbox="521 948 1382 1019">Wine and fruit wine (including sparkling forms), and wine products and fruit or vegetable wine products containing more than 6.5% alcohol by volume</td> <td data-bbox="1382 948 1641 1019">1.5% alc/vol</td> </tr> </tbody> </table>	Column 1	Column 2	Food, including alcoholic beverages, containing more than 1.15% alcohol by volume	Expressed in mL/100g or mL/100mL or X% ALCOHOL BY VOLUME or words and expressions of the same or similar effect	Alcoholic beverages containing not more than 1.15% alcohol by volume Beverages containing no less than 0.5% alcohol by volume	'CONTAINS NOT MORE THAN X% ALCOHOL BY VOLUME' or words and expressions of the same or similar effect.	Column 1	Column 2	Beer, cider and perry	0.3% alc/vol	Spirits, liqueurs, fortified wine, fortified fruit or vegetable wine, and all other alcoholic beverages containing more than 1.15% alcohol by volume	0.5% alc/vol	Wine and fruit wine (including sparkling forms), and wine products and fruit or vegetable wine products containing more than 6.5% alcohol by volume	1.5% alc/vol	<i>Not Applicable.</i>
Column 1	Column 2																
Food, including alcoholic beverages, containing more than 1.15% alcohol by volume	Expressed in mL/100g or mL/100mL or X% ALCOHOL BY VOLUME or words and expressions of the same or similar effect																
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Column 1	Column 2																
Beer, cider and perry	0.3% alc/vol																
Spirits, liqueurs, fortified wine, fortified fruit or vegetable wine, and all other alcoholic beverages containing more than 1.15% alcohol by volume	0.5% alc/vol																
Wine and fruit wine (including sparkling forms), and wine products and fruit or vegetable wine products containing more than 6.5% alcohol by volume	1.5% alc/vol																

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.7.1 Clause 3	A Beverage or a Food capable of being consumed as a Beverage, which contains more than 0.5% alcohol by volume measured at 20°C, except for beverages packaged before 20 Dec 2002.	<p>You must include on the label a statement of the approximate number of standard drinks in the package –</p> <p>(a) in the case of packages containing 10 or less standard drinks, accurate to the first decimal place; OR</p> <p>(b) in the case of packages containing more than 10 standard drinks, accurate to the nearest whole number of standard drinks.</p> <p>³⁰NOTE: <i>To calculate the Number of Standard Drinks – use the following formula:</i></p> <p>Volume of container (in Litres)* X % alcohol by volume (in ml/100ml) X 0.789** = The number of standard drinks.</p> <p>* eg, a 750mL bottle is 0.75 Litres.</p> <p>** The specific gravity of ethanol [alcohol] is 0.789</p>	<i>Not Applicable.</i>
Standard 2.7.1 Clause 4	Alcoholic Beverage which contains more than 1.15% alcohol by volume.	You must not use labelling or advertising that may suggest or imply that it is a low alcohol beverage.	You must not use labelling or advertising that may suggest or imply that it is a low alcohol beverage.
Standard 2.7.1 Clause 5	Beverages containing more than 0.5% alcohol by volume.	You must NOT include the words ‘non intoxicating’ or words of similar meaning on the label.	<i>Not Applicable.</i>
Standard 2.7.1 Clause 6	Food containing alcohol (eg, <i>liqueur chocolates, fruit cakes that contain alcoholic beverage ingredients, alcoholic beverages</i>)	You must not represent these products in a form which expressly or by implication suggests that the product is a non-alcoholic confection or non-alcoholic beverage.	You must not represent these products in a form which expressly or by implication suggests that the product is a non-alcoholic confection or non-alcoholic beverage.
Standard 2.7.2	Beer (Refer to the definition in Appendix 1).	NOTE: <i>The Clause 4 of Standard 1.2.3 requirement (refer to Section 7 of this labelling guide) to declare the presence of gluten-containing cereal products does not apply to Beer (as defined in Appendix 1).</i>	

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.7.4 and Transitional Standard 1.1A.3 Clause 11	Wine and Wine Products (Refer to the definitions in Appendix 1).	<p>Include on the label of wine or wine product words that clearly indicate the country of origin of the wine or wine product.</p> <p>If any of the grape juice, concentrated grape juice, potable spirit, or wine spirit used in any wine product originates in a country other than the country of origin of the wine, that country must also be named on the label as a source of ingredients used in the manufacture of the wine product.</p> <p><i>[the above requirements are included in Standard 1.1A.3, Clause 11].</i></p> <p>NOTE: (1) New Zealand Wine and Wine Products must also comply with the NZ Geographical Indications Act 1995 (which applies to anything which suggests or identifies the particular country, locality or region where the wine originated) and the Wine Act 2003, and the Regulations, Specifications and Notices made under that Act (these contain provisions that regulate the making, supply and export of wine in New Zealand).</p> <p>(2) Standard 1.1A.3 is a Transitional Standard that will only apply for up to 2 years from the commencement of Standard 1.2.11 in the FSC with respect to Country of Origin labelling.</p>	<i>Not Applicable.</i>
Standard 2.7.5	Spirits (Refer to the definition in Appendix 1).	<p>NOTE: The Clause 4 of Standard 1.2.3 requirement (refer to Section 7 of this labelling guide) to declare the presence of gluten-containing cereal products does not apply to Spirits (as defined in Appendix 1).</p> <p>Refer to Appendix 1 for the meaning of the term Geographical Indication in relation to Spirits.</p> <p>A geographical indication must not be used in relation to a spirit, even where the true origin of the spirit is indicated or the geographical indication is used in translation or accompanied by expressions such as 'kind', 'type', 'style', 'imitation' or the like, unless the spirit has been produced in the country, locality or region indicated.</p> <p>A spirit lawfully exported under a geographical indication, but bottled other than in the territory, locality or region indicated by the geographical indication must not be sold under that geographical indication –</p> <p>(a) unless the concentration of alcohol by volume in the spirit is at a level permitted under the laws for that geographical indication of the territory, locality or region indicated by that geographical indication; OR</p> <p>(b) if any other distinctive quality or characteristic of the spirit is such as to mislead or deceive the public as to the nature of the product identified by the geographical indication.</p> <p><i>(eg, 'Scotch' Whisky bottled in New Zealand must have the same percentage (%) alcohol as Whisky sold in Scotland. ie, 40% alc/vol minimum).</i></p>	Compositional and labelling requirements are the same as for fully labelled as described in Column 3 at left.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
SUGARS AND HONEY (Standard 2.8.2):			
Standard 2.8.2 Clause 3	Honey (Refer to the definition in Appendix 1). This is a Prescribed NAME.	Include the prescribed name: 'Honey' as the Name of the Food on the label. Do not use any other word or words instead to describe this food.	If the product is labelled voluntarily , use the prescribed name: 'Honey' As the Name of the Food.
INFANT FORMULA PRODUCTS (Standard 2.9.1):			
Standard 2.9.1	Infant Formula (Refer to the definition in Appendix 1). This is a Prescribed NAME. REFER TO STANDARD 2.9.1 IN THE FSC.	Include the prescribed name: 'Infant Formula' as the Name of the Food on the label. <i>Due to the special dietary needs and food safety sensitivity of the population for whom this food is intended (ie, infants, younger than 4 – 6 months of age) you must consult Standard 2.9.1 in the FSC to determine the labelling and compositional requirements.</i> NOTE: A food must not be represented as an infant formula product UNLESS it complies with all the relevant requirements of Standard 2.9.1.	NOTE: A food must not be represented as an infant formula product UNLESS it complies with all the relevant requirements of Standard 2.9.1.
Standard 2.9.1	Follow-on Formula (Refer to the definition in Appendix 1). This is a Prescribed NAME. REFER TO STANDARD 2.9.1 IN THE FSC.	Include the prescribed name: 'Follow-on Formula' as the Name of the Food on the label. <i>Due to the special dietary needs and food safety sensitivity of the population for whom this food is intended (ie, infants, aged from 6 months of age) you must consult Standard 2.9.1 in the FSC to determine the labelling and compositional requirements.</i> NOTE: A food must not be represented as an infant formula product UNLESS it complies with all the relevant requirements of Standard 2.9.1.	NOTE: A food must not be represented as an infant formula product UNLESS it complies with all the relevant requirements of Standard 2.9.1.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.9.1	<p>Infant Formula Products for Special Dietary Use (eg, those formulated for premature or low birthweight infants; those for metabolic, immunological renal, hepatic and malabsorptive conditions [eg, lactose intolerance], and those for specific dietary use based upon protein substitutes).</p> <p>Refer also to Infant Formula and Follow-on Formula above – NOTE: All the requirements for Infant Formula and Follow-on Formula products that are not inconsistent with the requirements of Division 3 of Standard 2.9.1 will also apply to Infant Formula Products for Special Dietary Use.</p>	<p><i>Due to the special dietary needs and food safety sensitivity of the population for whom this food is intended (as described at left) you must consult Standard 2.9.1 in the FSC (especially Division 3) to determine the labelling and compositional requirements.</i></p> <p><i>NOTE: A food must not be represented as an infant formula product UNLESS it complies with all the relevant requirements of Standard 2.9.1.</i></p>	<p>NOTE: A food must not be represented as an infant formula product UNLESS it complies with all the relevant requirements of Standard 2.9.1.</p>
FOODS FOR INFANTS (Standard 2.9.2):			
Standard 2.9.2	Foods for Infants (Refer to the definition in Appendix 1).	<p><i>Due to the special dietary needs and food safety sensitivity of the population for whom this food is intended (infants) you must consult Standard 2.9.2 in the FSC to determine the labelling and compositional requirements.</i></p>	Not Applicable.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
FORMULATED MEAL REPLACEMENTS AND FORMULATED SUPPLEMENTARY FOODS (Standard 2.9.3):			
Standard 2.9.3 Division 2: Clause 3	Formulated Meal Replacement (Refer to the definition in Appendix 1). This is a Prescribed NAME.	<p>Refer to Standard 2.9.3, Division 2 in the FSC for the compositional requirements for these foods.</p> <p>Include the prescribed name: ‘Formulated meal replacement’ as the Name of the Food on the label.</p> <p>In addition to the Standard NIP information (as described in Section 11 of this labelling guide), include in the Nutrition Information Panel the following information:</p> <ul style="list-style-type: none"> A declaration of the average quantities of the following vitamins and minerals present in the food (whether added or not): Vitamin A, Thiamin, Riboflavin, Niacin, Folate, Vitamin B₆, Vitamin B₁₂, Vitamin C, Vitamin D, Vitamin E, Calcium, Iodine, Iron, Magnesium, Phosphorus, Zinc, <p>AND,</p> <ul style="list-style-type: none"> A declaration of the average quantities of the following vitamins and minerals present in the food when they have been ADDED to the food: Biotin, Pantothenic acid, Vitamin K, Chromium: inorganic, Chromium: organic, Copper: inorganic, Copper: organic, Manganese: inorganic, Manganese: organic, Molybdenum: inorganic, Molybdenum: organic, Selenium: inorganic, Selenium: organic. <p><i>[the vitamin and mineral declarations described above would not in themselves be considered to be nutrition claims since they are requirements prescribed by the FSC].</i></p> <p>NOTE: A claim as to the presence in a formulated meal replacement of one of the vitamins or minerals listed above may be made on the label provided that –</p> <p>(a) no less than 10% of the RDI or ESADDI of that vitamin or mineral is present in a serving of the food; AND</p> <p>(b) where a vitamin or mineral has been added to the food, the claimed quantity of that vitamin or mineral in a serving does not exceed the quantity set out in Column 3 of Table 1 or Table 2 in the Schedule to Standard 2.9.3 (Refer to Standard 2.9.3 in the FSC for these Tables).</p> <p>ALSO, The label of the formulated meal replacement must also include words to the effect that the product must not be used as a total diet replacement.</p>	Not Applicable.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.9.3 Division 3: Clause 5	Formulated Supplementary Food (Refer to the definition in Appendix 1). This is a Prescribed NAME.	<p>Refer to Standard 2.9.3, Division 3 in the FSC for the compositional requirements for these foods.</p> <p>Include the prescribed name: 'Formulated supplementary food' as the Name of the Food on the label.</p> <p>In addition to the Standard NIP information (as described in Section 11 of this labelling guide), include in the Nutrition Information Panel the following information:</p> <ul style="list-style-type: none"> A declaration of the average quantities of the following vitamins and minerals present in the food when they have been ADDED to the food: Vitamin A, Thiamin, Riboflavin, Niacin, Folate, Vitamin B₆, Vitamin B₁₂, Vitamin C, Vitamin D, Vitamin E, Calcium, Iodine, Iron, Magnesium, Phosphorus, Zinc. <i>[the vitamin and mineral declaration described above would not in itself be considered to be a nutrition claim since it is a requirement prescribed by the FSC].</i> <p>NOTE: A claim as to the presence in a formulated supplementary food of one of the vitamins or minerals listed above may be made on the label provided that –</p> <p>(a) no less than 10% of the RDI of the vitamin or mineral listed above is present in a serving of the food; AND</p> <p>(b) no less than 10% of the ESADDI of the vitamin or mineral is present in a serving of the food; AND</p> <p>(c) where a vitamin or mineral has been added to the food, the claimed quantity of that vitamin or mineral in a serving of the food does not exceed the quantity set out in Column 5 of Table 3. (Refer to the Schedule attached to Standard 2.9.3 in the FSC for this Table).</p> <p>The label on a package of formulated supplementary food must include a description of the role of the food as a supplement to a normal diet to address situations where intakes of energy and nutrients may not be adequate to meet an individual's requirements.</p>	Not Applicable.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.9.3 Division 4 Clause 7	Formulated Supplementary Food for Young Children (Refer to the definition in Appendix 1). This is a Prescribed NAME.	<p>Refer to Standard 2.9.3, Division 4 in the FSC for the compositional requirements for these foods.</p> <p>Include the prescribed name: ‘Formulated supplementary food for young children’ as the Name of the Food on the label.</p> <p>In addition to the Standard NIP information (as described in Section 11 of this labelling guide), include in the Nutrition Information Panel the following information:</p> <ul style="list-style-type: none"> A declaration of the average quantities of the following vitamins and minerals present in the food when they have been ADDED to the food: Vitamin A, Thiamin, Riboflavin, Niacin, Folate, Vitamin B₆, Vitamin B₁₂, Vitamin C, Vitamin D, Vitamin E, Calcium, Iodine, Iron, Magnesium, Phosphorus, Zinc. <i>[the vitamin and mineral declaration described above would not in itself be considered to be a nutrition claim since it is a requirement prescribed by the FSC].</i> <p>NOTE: A claim as to the presence in a formulated supplementary food for young children of one of the vitamins or minerals listed above may be made on the label provided that –</p> <p>(a) no less than 10% of the RDI of the vitamin or mineral listed above is present in a serving of the food; AND</p> <p>(b) no less than 10% of the ESADDI of the vitamin or mineral is present in a serving of the food; AND</p> <p>(c) where a vitamin or mineral has been added to the food, the claimed quantity of that vitamin or mineral in a serving of the food does not exceed the quantity set out in Column 3 of Table 3. (Refer to the Schedule attached to Standard 2.9.3 in the FSC for this Table).</p> <p>The label on a package of formulated supplementary food for young children must include a description of the role of the food as a supplement to a normal diet to address situations where intakes of energy and nutrients may not be adequate to meet an individual’s requirements.</p>	Not Applicable.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
FORMULATED SUPPLEMENTARY SPORTS FOODS (Standard 2.9.4):			
Standard 2.9.4 Division 1	Formulated Supplementary Sports Foods (Refer to the definition in Appendix 1). This is a Prescribed NAME.	<p><i>Refer to Standard 2.9.4, Division 1 in the FSC for the compositional requirements for these foods.</i></p> <p>Include the prescribed name:</p> <p>'Formulated supplementary sports food'</p> <p>as the Name of the Food on the label.</p> <p>Include on the label –</p> <p>(1) statements to the effect that –</p> <p>(a) the food is not a sole source of nutrition and should be consumed in conjunction with a nutritious diet; AND</p> <p>(b) the food should be used in conjunction with an appropriate physical training or exercise program; AND</p> <p>(2) (a) directions stating the recommended quantity and frequency of intake of the food; and</p> <p>(b) a statement of the recommended consumption in one day; and</p> <p>(c) a nutrition information panel in accordance with Standard 1.2.8 of the FSC (refer to Section 11 of this labelling guide); AND</p> <p>(3) the warning statement – 'Not suitable for children under 15 years of age or pregnant women: Should only be used under medical or dietetic supervision' <i>[This statement must be in type size of at least 3mm high and use the exact words shown]; AND</i></p> <p>(4) If the formulated supplementary sports food contains added phenylalanine then the label must include, the warning statement – 'Phenylketonurics: Contains phenylalanine'. <i>[This statement must be in type size of at least 3mm high and use the exact words shown].</i></p> <p>Regarding Ingredient claims –</p> <p>(1) If the label refers to the presence of a particular ingredient, other than –</p> <p>(a) vitamins or minerals; OR (b) in a statement required elsewhere by the FSC [eg, <i>ingredient names required in the Ingredient Listing</i>]; the label must also include a statement of the amount by weight (expressed per 100g of the food or as a percentage) of the ingredient in the food either – (c) immediately after the statement referring to the presence of the ingredient; OR (d) immediately following the name of that ingredient in the statement of ingredients UNLESS the Nutrition Information Panel lists the particular ingredient and the average quantity by weight of the ingredient in – (a) a serving of the food; AND (b) per 100g or 100mL of the food.</p> <p>[CONTINUED PAGE 16]</p>	<p>You must label the product as follows:</p> <p>Include the prescribed name:</p> <p>'Formulated supplementary sports food'</p> <p>as the Name of the Food on the label.</p> <p>Include on the label –</p> <p>(1) statements to the effect that –</p> <p>(a) the food is not a sole source of nutrition and should be consumed in conjunction with a nutritious diet; AND</p> <p>(b) the food should be used in conjunction with an appropriate physical training or exercise program; AND</p> <p>(2) (a) directions stating the recommended quantity and frequency of intake of the food; and</p> <p>(b) a statement of the recommended consumption in one day; and</p> <p>(c) a nutrition information panel in accordance with Standard 1.2.8 of the FSC (refer to Section 11 of this labelling guide); AND</p> <p>[CONTINUED PAGE 16]</p>

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
	Formulated Supplementary Sports Foods [CONTINUED]	<p>Regarding Vitamin and Mineral claims –</p> <p>(1) you must not include on the label a claim as to the presence of a vitamin or mineral unless – (a) the reference is required elsewhere by the FSC; OR (b) the reference is specifically permitted by Clause 5 of Standard 2.9.4 in the FSC; AND</p> <p>(2) You may only claim on the label the presence of a vitamin or mineral in the food if –</p> <p>(a) the food contains –</p> <p>(i) at least 10% of the recommended dietary intake for that vitamin or mineral in a serving of that food or, in relation to a food which requires dilution or preparation according to directions, the quantity of the food which when diluted or prepared produces a normal serving; OR (ii) at least 10% of the amount specified in Column 3 of the Schedule to Standard 2.9.4 [refer to Standard 2.9.4 in the FSC for this schedule] for that vitamin or mineral in a normal serving of that food, or in relation to a food which requires dilution or preparation according to directions, the quantity of the food which when diluted or prepared produces a normal serving; AND</p> <p>(b) the amount claimed does not exceed the amount specified in Column 2 of the Table to paragraph 2(a) of Standard 2.9.4 in the FSC [refer to Standard 2.9.4 in the FSC for this Table]; AND</p> <p>(c) the label on the package of the food includes a statement in accordance with Clause 9 of Standard 1.3.2 [refer to Standard 1.3.2 in the FSC for these requirements].</p> <p>Lastly, unless specific permission is given above, the label on a package of formulated supplementary sports food must not include an express or implied representation that relates to any property or proposed use of the food to enhanced athletic performance or beneficial physiological effects.</p>	<p>(3) the warning statement – ‘Not suitable for children under 15 years of age or pregnant women: Should only be used under medical or dietetic supervision’ [This statement must be in type size of at least 3mm high and use the exact words shown]; AND</p> <p>(4) If the formulated supplementary sports food contains added phenylalanine then the label must include, the warning statement – ‘Phenylketonurics: Contains phenylalanine’. [This statement must be in type size of at least 3mm high and use the exact words shown].</p>
Standard 2.9.4 Division 2	High Carbohydrate Formulated Supplementary Sports Food (Refer also to the requirements for Formulated Supplementary Sport Food in the section above in this table).	<p>Refer to Standard 2.9.4, Division 2 in the FSC for the compositional requirements for these foods.</p> <p>Include on the label statements to the effect that –</p> <p>(a) if used during exercise, the food should be consumed in accordance with directions, to avoid the possibility of gastro-intestinal upset; AND</p> <p>(b) the food must be consumed with an appropriate fluid intake.</p> <p>You MAY also include on the label statements to the effect that –</p> <p>(a) the product is useful either before, during and/or after sustained strenuous exercise; AND</p> <p>(b) appropriate usage may assist in the provision of energy in the form of carbohydrates.</p>	Not Applicable.

Column 1 FSC Reference	Column 2 Type of food [or type of food ingredient]	Column 3 Instructions for when the food is required to be fully labelled	Column 4 Instructions for when the food is exempt from being fully labelled
Standard 2.9.4 Division 2	Protein Energy Formulated Supplementary Sports Food (Refer also to the requirements for Formulated Supplementary Sport Food section above in this table).	<p>Refer to Standard 2.9.4, Division 2 in the FSC for the compositional requirements for these foods.</p> <p>Include on the label a statement to the effect that the food must be consumed with an appropriate fluid intake.</p> <p>You MAY also include on the label statements to the effect that –</p> <ul style="list-style-type: none"> (a) the product may assist in providing a low-bulk diet as may be required during training; AND (b) the product may assist in supplementing the diet with a high energy source as may be required during training; AND (c) usage as directed may assist in the development of muscle bulk; AND (d) the product is useful either before, during and/or after sustained strenuous exercise. 	Not Applicable.
Standard 2.9.4 Division 2	Energy Formulated Supplementary Sports Food (Refer also to the requirements for Formulated Supplementary Sport Food section above in this table).	<p>Refer to Standard 2.9.4, Division 2 in the FSC for the compositional requirements for these foods.</p> <p>Include on the label statements to the effect that –</p> <ul style="list-style-type: none"> (a) if used during exercise, the food should be consumed in accordance with directions, to avoid the possibility of gastro-intestinal upset; AND (b) the food must be consumed with an appropriate fluid intake. <p>Also, if more than 30% of the energy yield of the energy supplement is derived from fat, the label must include a statement to the effect that the product is a high fat food and should be used for special fat loading strategies rather than everyday use.</p> <p>You may also include on the label statements to the effect that –</p> <ul style="list-style-type: none"> (a) the product may assist in supplementing the diet with an energy source as may be required during training; AND (b) the product is useful either before, during and/or after sustained strenuous exercise. 	Not Applicable.
SALT AND SALT PRODUCTS (Standard 2.10.2):			
Standard 2.10.2	Sodium Salt Mixture or Salt Substitute (Refer to the definition in Appendix 1).	<p>The label on a package of reduced sodium salt mixture or salt substitute –</p> <ul style="list-style-type: none"> (a) MUST declare the Sodium and Potassium content, expressed per 100g; AND (b) may include a declaration of the percentage reduction of sodium in the reduced sodium salt mixture or salt substitute, relative to salt. <p>NOTE:</p> <ul style="list-style-type: none"> 1) The details outlined above do not constitute a nutrition claim for the purposes of Standard 1.2.8 of the FSC (refer to Section 11 of this labelling guide). 2) Where a claim is made in relation to the sodium content of foods to which reduced sodium salt mixtures or salt substitutes have been added, a nutrition information panel in accordance with Standard 1.2.8 (Refer to Section 11 of this guide) is required on the label of such foods. 	Not Applicable.



Food Identification Labelling and Legibility Requirements

– Standards 1.2.2 and 1.2.9

Version Control May 2009

Key to Section 6

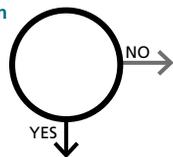
Where
to start



Record



Question



Signals the end
of the flowchart
(may also include
an instruction)

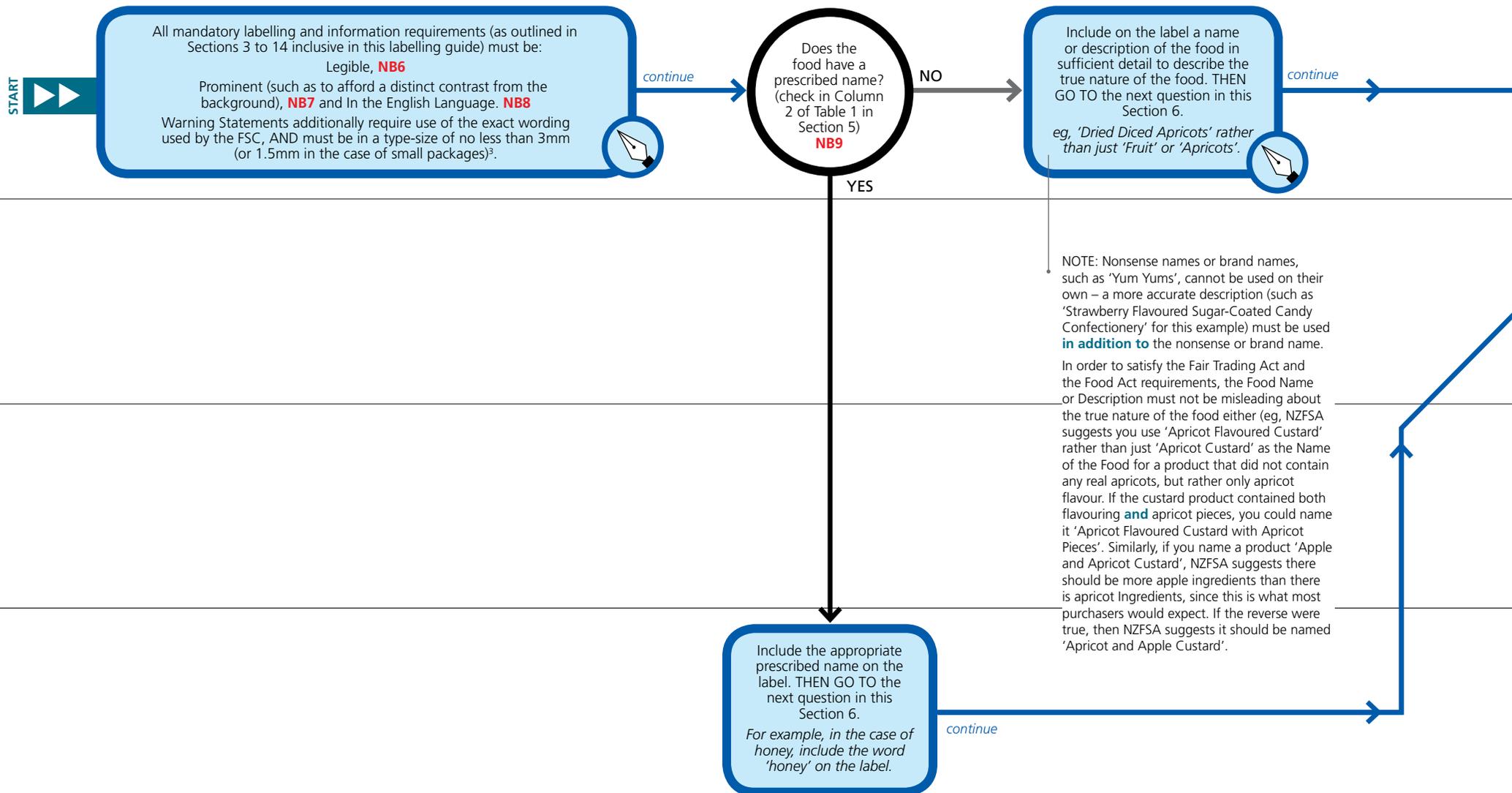


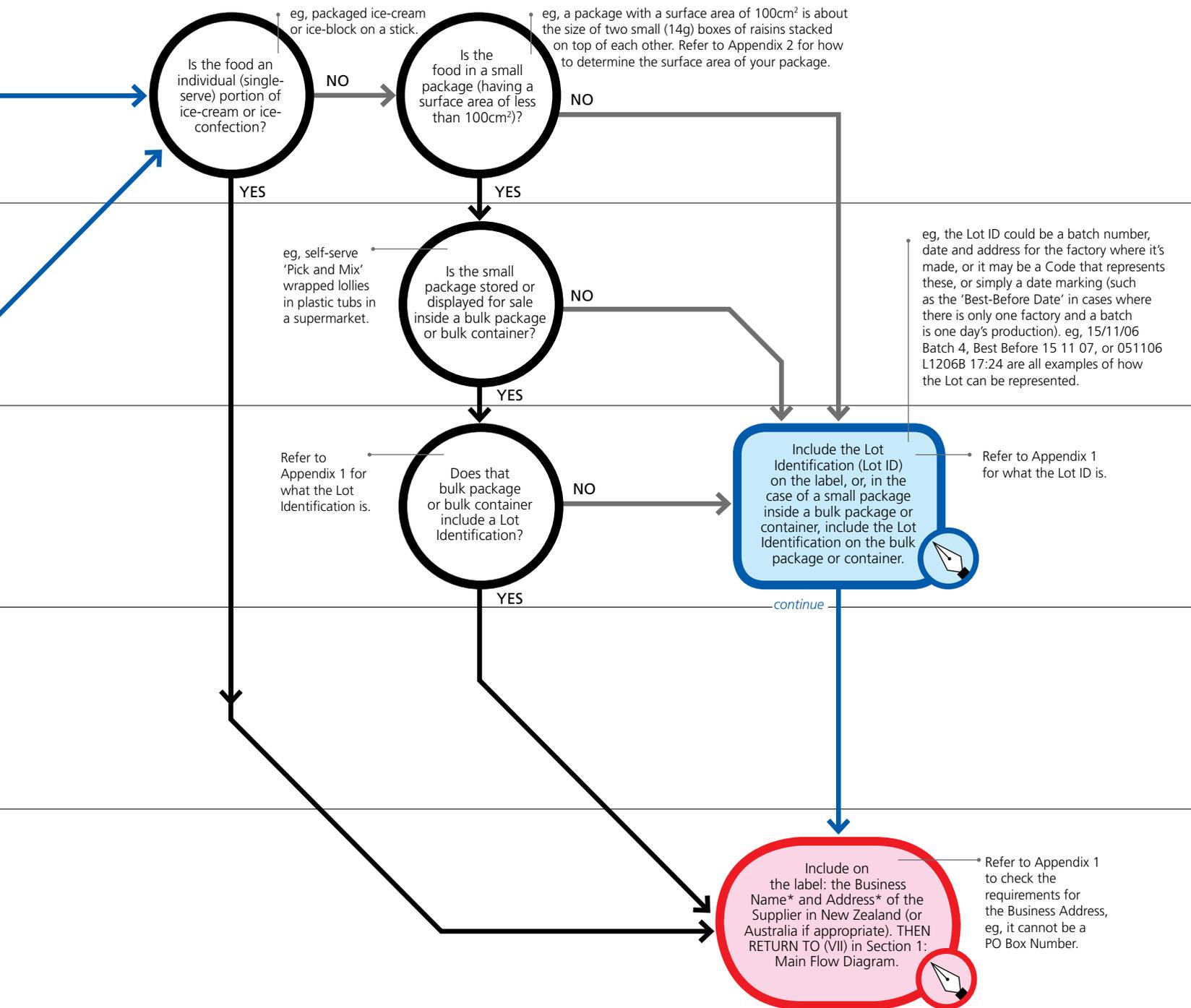
Instruction



Reference to a
Supplementary
note elsewhere
on the page
eg. NB5

NBx





NB6³
NOTE:
The required labelling should be impossible to remove or at least shouldn't rub off or fade to the point that it's not easily readable. This also extends to Date Markings and Lot Identification, which are not normally pre-printed on the packaging. Words should be easy to read.
Thought should be given to the conditions under which the food will be presented for sale (for example, consider the available lighting. Will it be up on a high shelf? Will it be coated by ice crystals in a freezer display cabinet? etc). The eyesight of the likely purchasers of the product should also be considered, including allowing for individuals with poor eyesight (short or long-sighted) and common colour blindness disabilities such as not being able to distinguish between green type on a red background and vice versa.

NB7³
Words must be easily distinguishable from graphics and decorations or logos. The labelling should also be noticeable or 'stand-out' from the background colour. Ideally, required information should be placed on the package such that it falls within the same field of vision (eg, together on the front panel of a product pack) when it is presented for sale.

NB8³
Languages other than English are allowed on labels, but they must not negate or contradict the required information in English.

NB9
There are very few prescribed names for foods in the FSC.
As at May 2009 'Prescribed Names' in the FSC are:

- Honey
- Fermented Comminuted Processed Meat (various as outlined in Standard 2.2.1 of the FSC depending on if it is heat treated or not or cooked or not, eg, 'Fermented Processed Meat – Not Heat Treated')
- Fermented Comminuted Manufactured Meat (various as outlined in Standard 2.2.1 depending on if heat treated or not or cooked or not)
- Infant Formula
- Follow-on Formula
- Formulated Meal Replacement
- Formulated Supplementary Food
- Formulated Supplementary Food for Young Children
- Formulated Supplementary Sports Food
- Diacylglycerol Oil [this is a Novel Food – Refer to Standard 1.5.1 in the FSC]

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Warning and Advisory Statements and Declarations

– Standard 1.2.3

Version Control July 2007

Key to Section 7

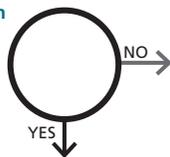
Where to start



Record



Question



Signals the end of the flowchart (may also include an instruction)



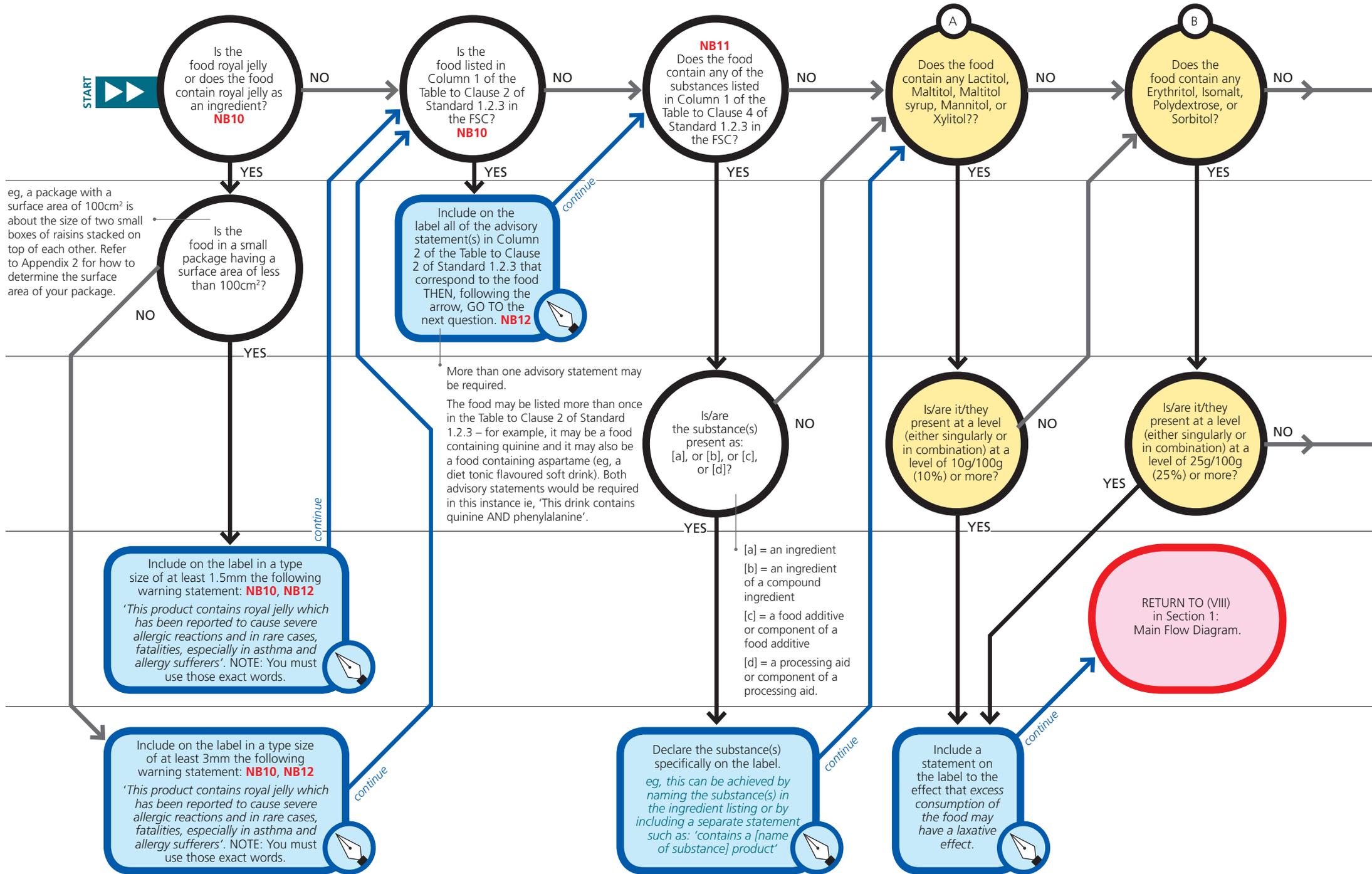
Instruction

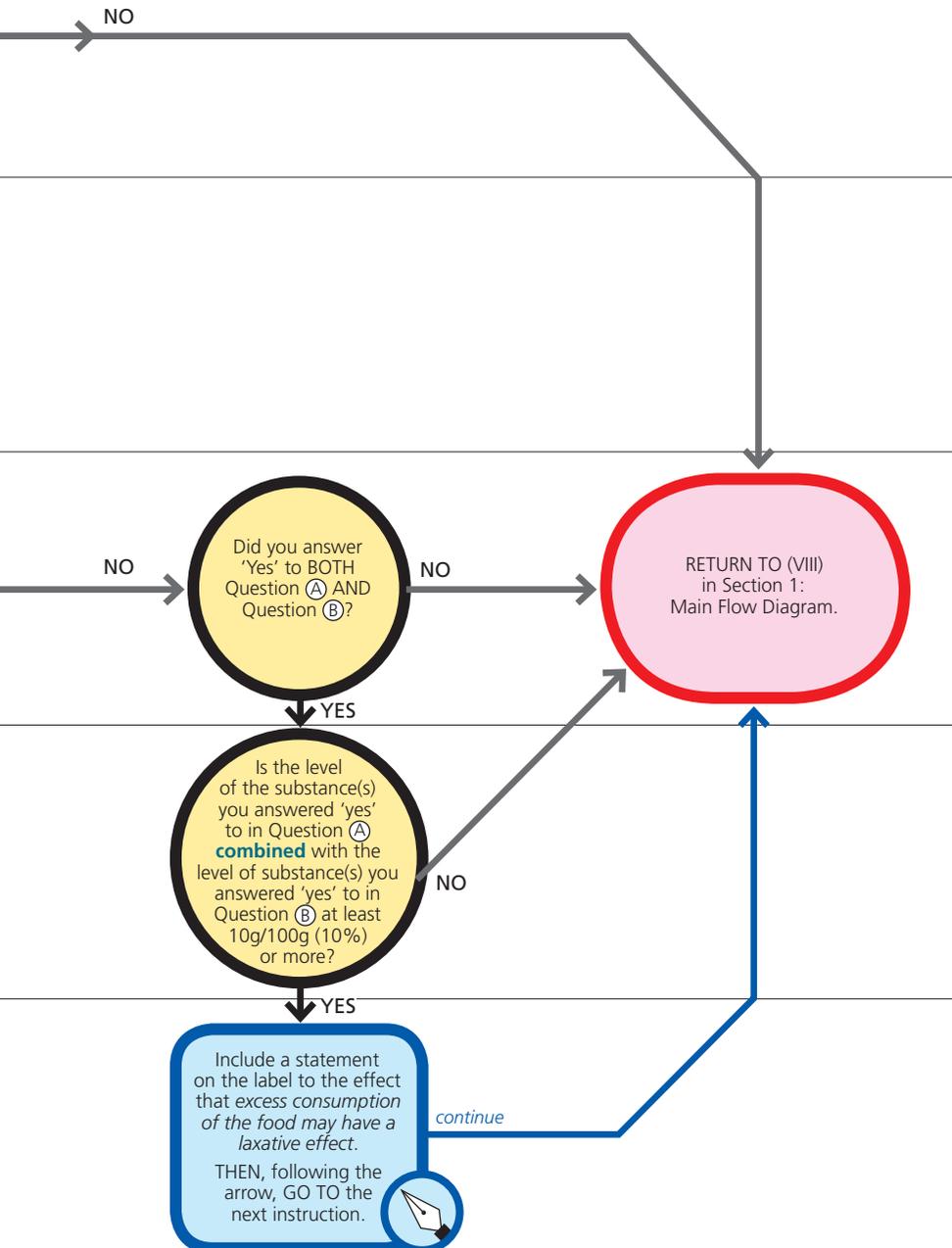


Questions related to food containing polyols, isomalt or polydextrose



Reference to a Supplementary note elsewhere on the page eg, NB10 **NBx**





ADDITIONAL NOTES – IMPORTANT

NB10

In addition to the generally applied Warning and Advisory Statements and Declarations covered in this Section 7 Flowchart, there may also be Warning and Advisory Statements and Declarations that apply specifically to certain foods. You must refer to Section 5 to check whether or not your food product, or any of its ingredients, is one of these foods.

NB11

(1) Even minute traces of one of these food allergens can trigger a life-threatening allergic reaction, so to ensure food safety it is imperative that they are declared on your label.

The presence of these food allergens* and intolerance substances* are often not obvious in foods – they can be hidden.

* (ie, the gluten-containing cereals wheat, rye, barley, oats, spelt and their hybridised strains, crustacea, egg, fish, milk, peanuts and soybeans, tree nuts and sesame seeds, and the products of all these [except for gluten-containing cereal products present in beer and spirits as standardised in Standards 2.7.2 and 2.7.5 respectively of the FSC], and added sulphites in concentrations of 10mg/kg or more) [Refer to the Table to Clause 4 of Standard 1.2.3 in the FSC itself]. For example¹¹:

- Wine may contain products of **fish** (isinglass), **egg** (albumin) and **milk** (caseinates) since these are often used as processing aids in fining/clarifying the wine.
- Icing sugar normally contains a small amount of **wheat** starch.
- Antioxidant (306) [tocopherols] is usually derived from **soybeans**.
- Emulsifier (322) [lecithin] is usually derived from **soybeans**, and sometimes from **eggs**
- Flavours and Flavourings often contain at least one of the allergens.
- Maltodextrin is made by the hydrolysis (splitting) of starch, which is often derived from a gluten-containing cereal such as **wheat**. Also, enzymes derived from malted **barley** or malted **wheat** are often used to perform the hydrolysis.
- **Soybean** or **peanut** oil may be used as lubricants on the processing line (eg, conveyor belts) used for any food product.
- Many ingredients contain (at high levels) **added sulphites**, which have additive code numbers from 220 to 228 inclusive. They are often used as preservatives or colour fixatives, eg, desiccated coconut, glucose syrup, processed and/or dried fruit/vegetables and similar foods, may all contain these **sulphite** additives. They may just be listed in your supplier's ingredient listing as 'Preservative' followed by their code number in brackets, eg, 'Preservative (221)'. However, you would need to declare the presence of added sulphites specifically if they are present at 10mg/kg (= 10ppm) or more in your food product, eg, you would declare 'Preservative (221)' as 'Preservative (sodium sulphite), or include a statement such as '**contains added sulphites**' on your label.

There are numerous other examples, that are not mentioned here, **so it is essential that you always check for the presence of the allergens and intolerance substances with your ingredient suppliers**. Sending a questionnaire (that lists all the substances in Column 1 of the Table to Clause 4 of Standard 1.2.3 of the FSC) to all your suppliers is a good way to check this. Checking is particularly important for imported foods, since many countries do not have compulsory allergen labelling. It is also very important that you make it clear to your suppliers that there are no lower threshold limits or exemptions, because in some countries there are (eg, the European Union exempts wheat-based maltodextrin, but the FSC requires ANY product of wheat to be declared. The FSC also requires an allergen declaration even when only traces of the allergen are present and irrespective of whether or not allergen proteins can be detected).

The 'AFGC Guide to Allergen Management and Labelling' Publication available from the AFGC website provides guidance for the food industry in allergen management and labelling: www.afgc.org.au

(2) Since the presence of undeclared food allergens is a food safety issue (allergic reactions can be life-threatening), NZFSA will generally require you to recall your food product if it contains products of any of the substances listed in Column 1 of the Table to Clause 4 of Standard 1.2.3 if they are not declared on the label.

NB12

Warning Statements require that you use on your label the **exact wording** as shown in the FSC and a minimum type-size of 3mm (or 1.5mm in the case of small packages) is also specified for Warning Statements (the *type-size* is the measurement from the base to the top of a letter or numeral). You may choose your own wording for **Advisory Statements**, provided the meaning is the same as specified in the FSC, and there is no minimum print-size for Advisory Statements, provided the Statement is Prominent, Legible and in English (refer to the legibility Requirements in Section 6: Food Labelling and Legibility Requirements).

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Statement of Ingredients

– Standard 1.2.4

Version Control July 2007

Key to Section 8

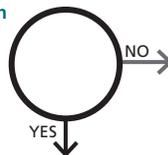
Where to start



Record



Question



Signals the end of the flowchart in the applicable part (may also include an instruction)



Instruction



Reference to a Supplementary note elsewhere on the page eg, NB13

NBX

Background

Most packaged foods require a Statement of Ingredients (the Ingredient Listing). The Statement of Ingredients provides consumers with valuable information about the food and allows them to make an informed choice when buying food.

Standard 1.2.4 of the FSC specifies the labelling provisions for a Statement of Ingredients.

The FSC defines an ingredient as *'any substance, including a food additive, used in the preparation, manufacture or handling of a food.'*

This Section is divided into four Parts:

- Part 0 explains how to use the other Parts (Part 1, Part 2 and Part 3) in order to compile the Ingredient Listing, if required, for your food.
- Part 1 helps to determine if an Ingredient Listing is required on the food product's label (in most cases an ingredient listing will be required but there are some exceptions).
- Part 2 helps to determine the ingredients that need to be included in the Ingredient Listing on the food product's label.
- Part 3 explains how each ingredient is to be declared in the Ingredient Listing.

How to put together an Ingredient Listing using Section 8:

1. Read all instructions carefully.
2. Check that each ingredient used to make the food product is PERMITTED by the FSC. (Refer to Appendix 3 for how to check whether each of your ingredients is permitted in the food product).
3. Start at Page 1 of the Section 8, Part 1: 'Does my Food Product Require an Ingredient Listing?' flowchart. Work through this flowchart to decide if an Ingredient Listing is required for the product. NOTE: Foods which are exempt from being fully labelled (refer to Section 3) also do not need to have an Ingredient Listing.
4. If the product does NOT need an Ingredient Listing return to (XI) in Section 1: 'Main Flow Diagram', and continue from there.
5. If the product does need an Ingredient Listing proceed as follows:

6. **WRITE THE RECIPE AS A LIST:** Include a full description of each ingredient and the quantity used (this must be the **weight** used – not the volume so for each liquid ingredient the weight not the volume must be used. NOTE: For a specified quantity of liquid, weight and volume are generally NOT the same, eg, 10 Litres of Soy sauce will weigh 12.17kg and NOT 10 Kilograms). Be consistent with units used to record the quantity ie, use either ALL kg or ALL g. Do not use a mixture of both.

Remember the FSC defines an ingredient as *'any substance, including a food additive, used in the preparation, manufacture or handling of a food.'*

7. **GROUP IDENTICAL INGREDIENTS:** Next group any identical ingredients together and combine their weights into a total weight.

Consideration should also be given to ingredients that can be grouped together using a FSC Generic Name (refer to the Section 8, Part 3 flowchart, and step 15 below, about these).

8. **REARRANGE INGREDIENTS INTO DESCENDING ORDER OF IN-GOING WEIGHT¹²:** Once you have grouped all identical ingredients together, so that each ingredient is listed ONLY ONCE in the recipe, rearrange the ingredients and their corresponding weight used into descending order of weight (ie, write the ingredient used in the largest quantity first, followed by the ingredient used in the next-largest quantity and so on, finishing with the ingredient used in the least amount). This is the order to be used when compiling your label's Ingredient List.

We will refer to this as your **RECIPE LIST**.

9. **COMPOUND INGREDIENTS:** Some of the ingredients may be 'compound ingredients' (the FSC defines 'compound ingredients' as being *comprised of two or more ingredients which includes additives*). It is not always obvious that your ingredient is a compound ingredient, so always check with the ingredient supplier (eg, chocolate, peanut butter, canned corn kernels, baking powder, beef stock powder, breadcrumbs, cheese, margarine, icing sugar [*usually contains added wheat starch*], and even table salt [*this contains anticaking agent*] are all compound ingredients since they all contain at least two ingredients).

For the purposes of compiling the product's Ingredient Listing, make sure that each compound ingredient used has its own Ingredient Listing.

There are two options for how the ingredients of compound ingredients can be declared in the ingredient listing. You can either:

(a) Declare the compound ingredient by its name in its appropriate place in the Ingredient Listing, and list its ingredients in brackets immediately after the name of the compound ingredient, in descending order of ingoing weight, or

(b) Declare ALL OF THE INGREDIENTS of the compound ingredient SEPARATELY as if they were individual ingredients of the food.

However, compound ingredients in 'Food for Infants' must be declared using option (b).

10. **DEHYDRATED AND CONCENTRATED INGREDIENTS:** If the product uses a dehydrated (dried) or concentrated ingredient, and added water is one of the ingredients used to reconstitute the dehydrated or concentrated ingredient there are two ways to list the dehydrated or concentrated ingredient–
- (a) list the reconstituted ingredient in its appropriate place in the ingredient list (the amount of water required to reconstitute the ingredient would then be included in this weight). In this case you would precede the name of the ingredient in the recipe list with the word ‘reconstituted’ (or one of equivalent meaning), OR:
- (b) list the dehydrated or concentrated ingredient in its appropriate place in the recipe list (do NOT include the weight of the water added to reconstitute). In this case the word ‘dried’, ‘dehydrated’ or ‘concentrated’ (as appropriate) would be included in the name of the ingredient (eg, dried apple).
11. **ALTERNATIVE INGREDIENTS:** If an ingredient (including additives) is regularly substituted by a similar ingredient, both ingredients may be listed in the Ingredient Listing, but it must be made clear that they’re alternatives (eg, ‘Mango or Papaya Juice’). Both ingredients must be listed in order to comply with Fair Trading legislation and the Food Act.
12. **CALCULATE THE TOTAL RECIPE WEIGHT AND PERCENTAGES:** Divide the weight of each ingredient by the total recipe weight, then multiply this value by 100:

ie,

$$\frac{\text{Ingoing Weight of Ingredients in Question}}{\text{Total Weight of ALL Ingredients}} \times 100\%$$

13. **DETERMINE EVAPORATIVE LOSSES OF VOLATILE INGREDIENTS:** If the production process involves a cooking or heating process that causes some of the volatile ingredients (like water and alcohol) to be lost by evaporation, this will affect the order in which the volatile ingredient occurs in the ingredient list. The amount that remains in the final food after the cooking or heating process determines the descending order position. Refer to Appendix 4 for how to determine this amount.
14. **DO ALL THE INGREDIENTS NEED TO BE DECLARED IN THE INGREDIENT LISTING?**
- Using the flowchart in Section 8, Part 2: check through all the ingredients in the recipe noting the ones that must be included in the Ingredient Listing. NOTE: You must check each ingredient separately (*including ingredients of compound ingredients*). Use the Section 15 Checklist to record all instructions as you work through the PART 2 flowchart.

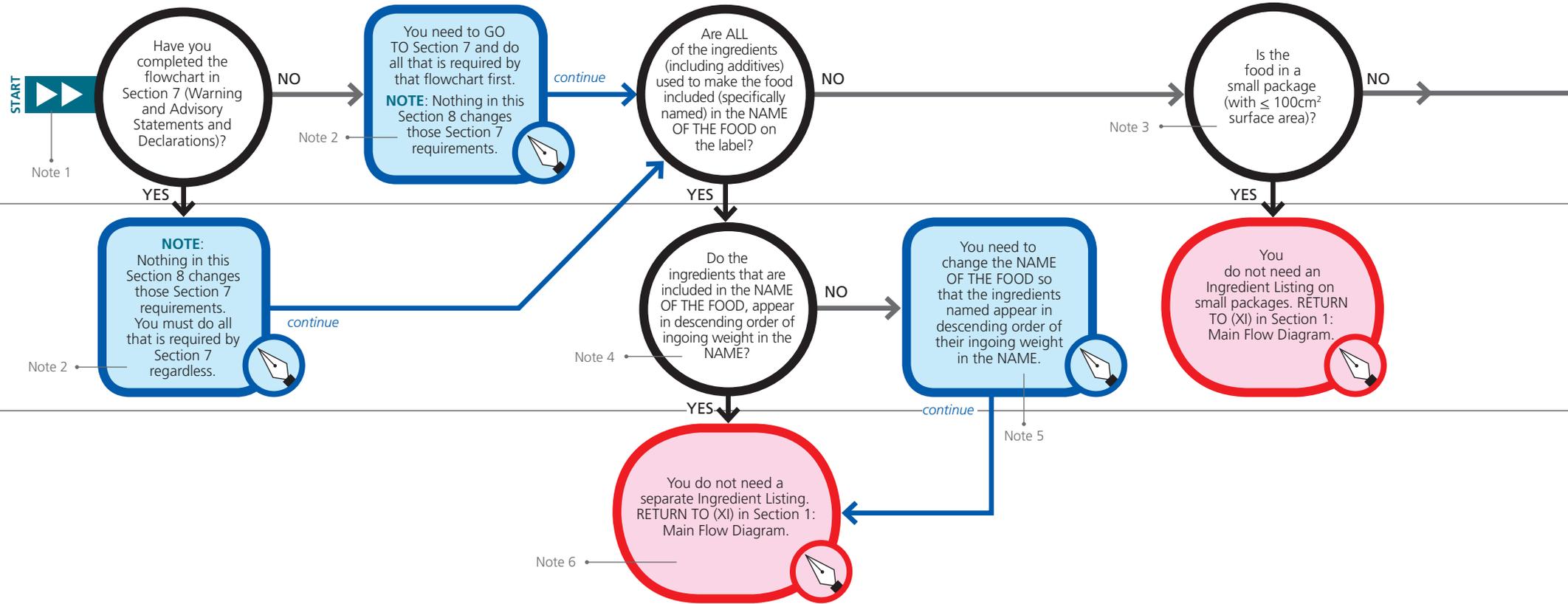
15. **DECLARING INGREDIENTS IN THE INGREDIENT LISTING:** Check each ingredient in turn from the ingredients in the Ingredient List using the Section 8, Part 3: flowchart. Make any appropriate changes to how you declare (or describe) each ingredient in your ‘descending order’ Draft Ingredient Listing accordingly. The final result is the Ingredient Listing or ‘Statement of Ingredients’ that you need to include on your food product’s Label. Record the Statement of Ingredients in the Section 15 Checklist as you work through this flowchart. The ingredients can be listed in descending order one beneath the other (in a vertical list – top to bottom) on the product’s label, or the ingredients can be listed in their descending order across the label (left to right).

If some ingredients are grouped together into a Generic Name, the ‘descending order’ position of the grouped ingredients will probably need to be altered as the in-going weights will be summed together to determine the new ‘descending order’ position.

16. Remember to RECORD all decisions and instructions on the Section 15 Checklist, as you work through all four parts of this Section 5. Refer to Appendix 5 for examples of how to compile the Ingredient Listing.

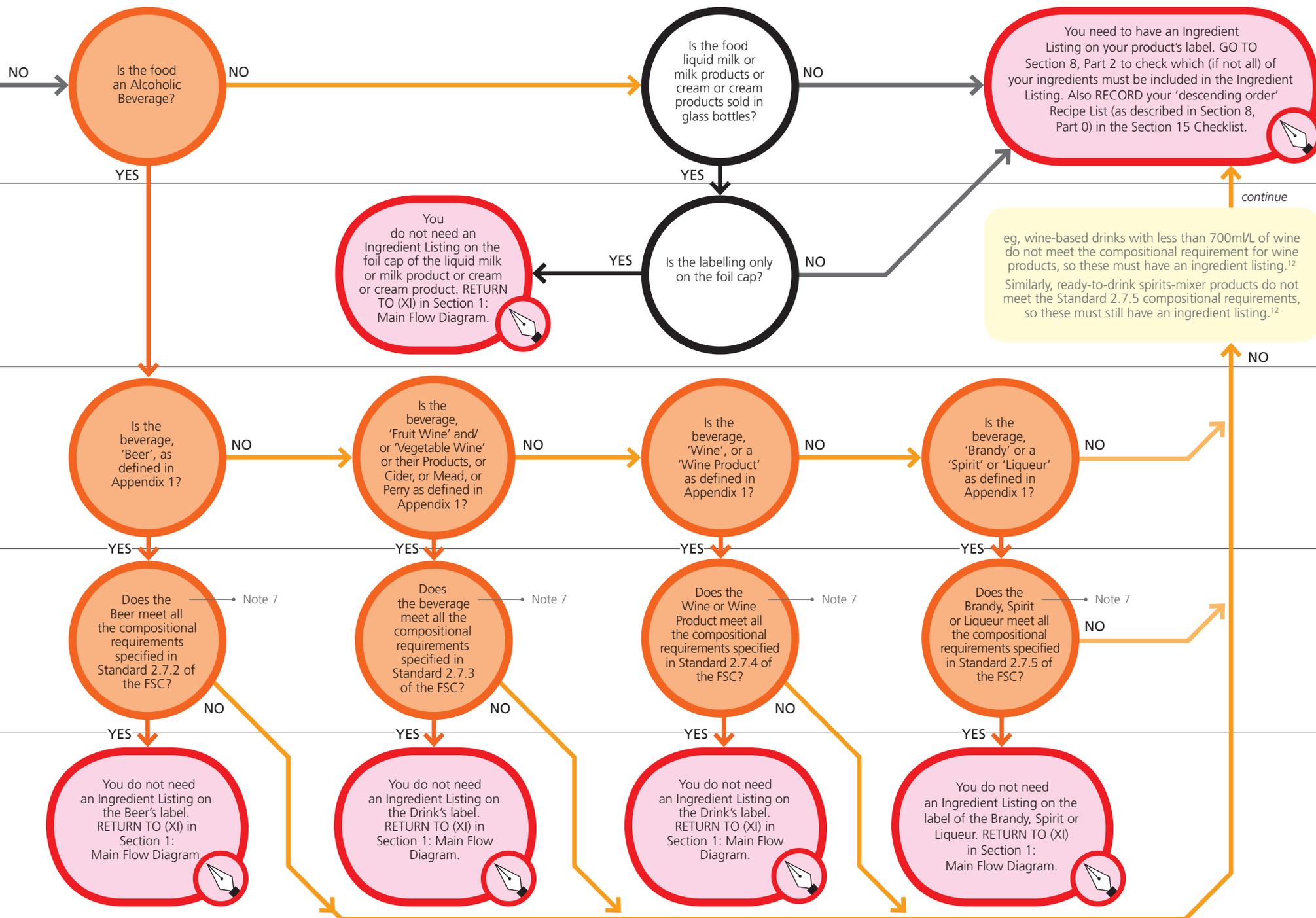
Special Case – Dehydrated or Concentrated Food Products intended to be Reconstituted before Consumption

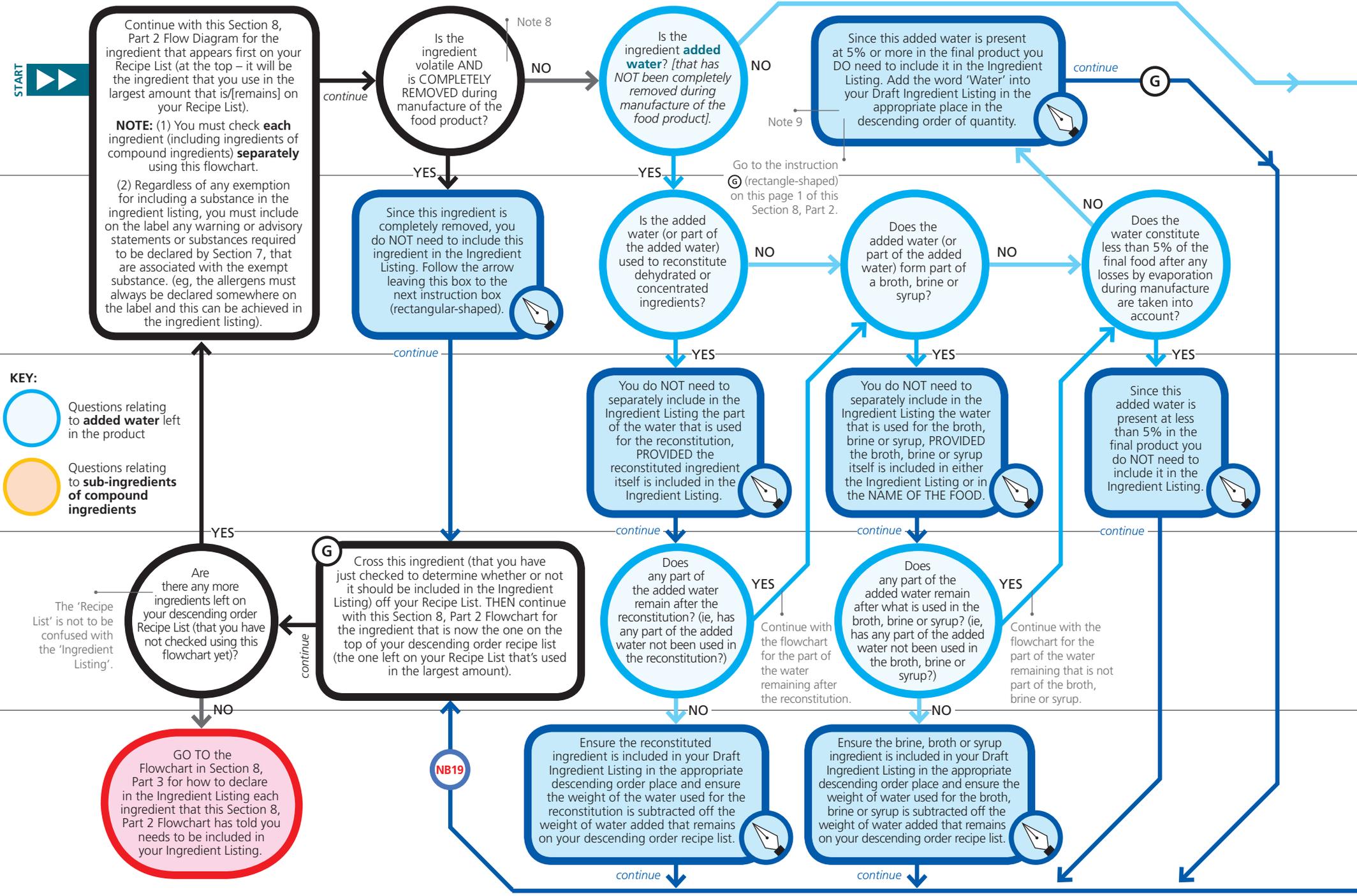
Where a dehydrated or concentrated food is intended to be reconstituted, by following directions on the label, the ingredients may be listed in the Ingredient Listing in descending order of their proportion by weight in the reconstituted (ready-to-eat or ready-to-drink) product. However, you must make it clear that the Ingredient Listing is for the reconstituted product. For example, you could start the ingredient listing with words such as: ‘Ingredients when Reconstituted’ or ‘The Ready-to-drink beverage contains’ or similar explanation.

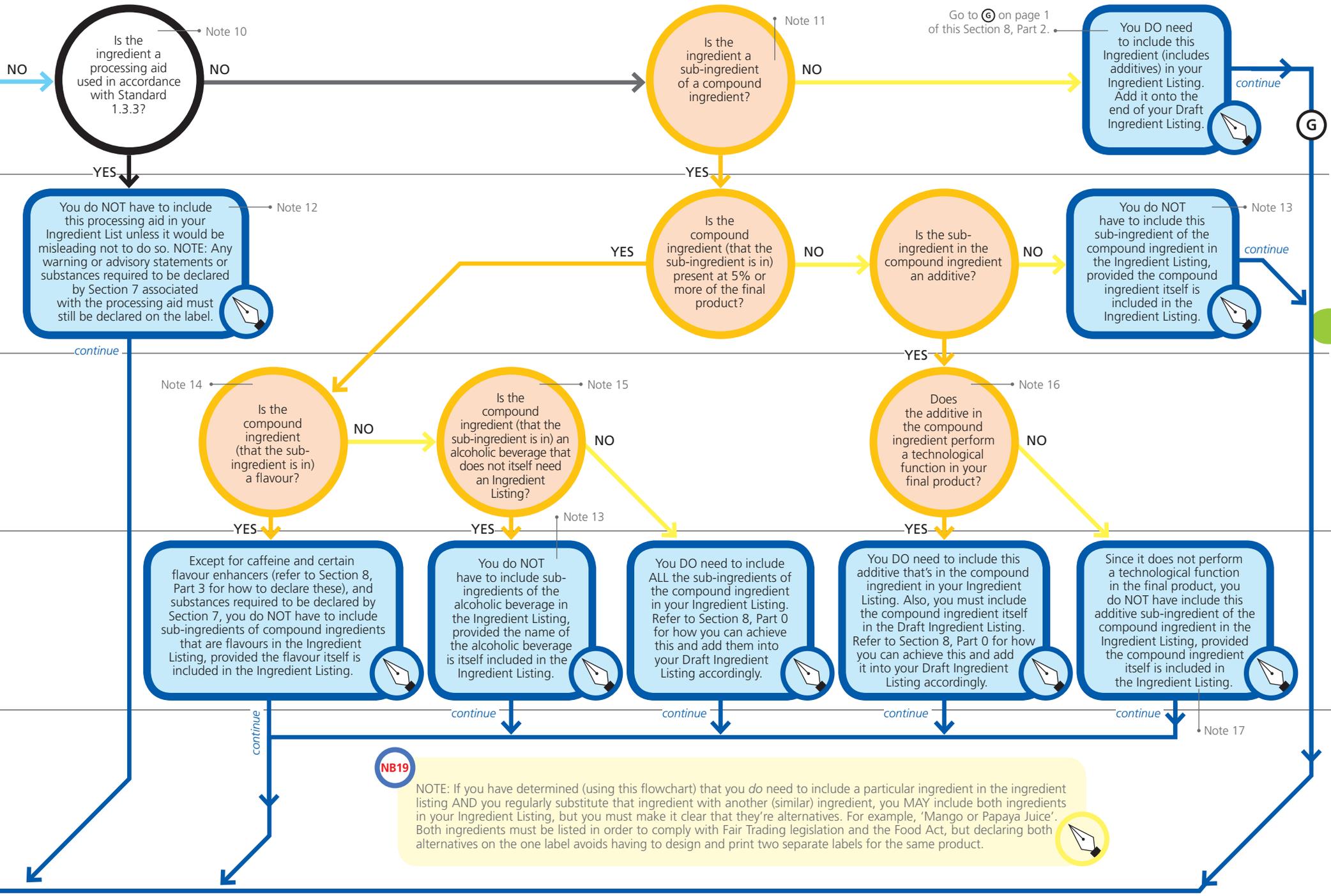


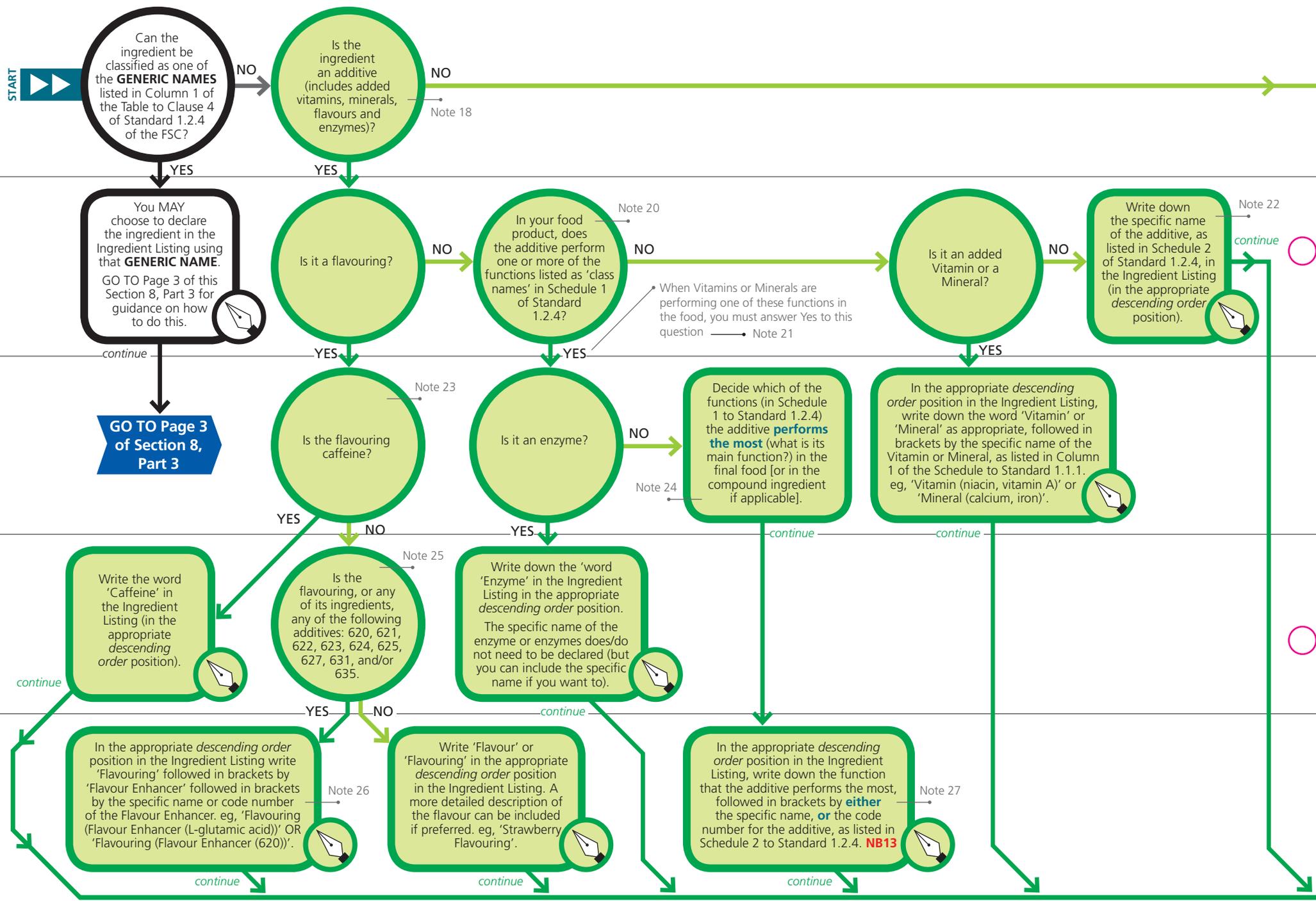
KEY:

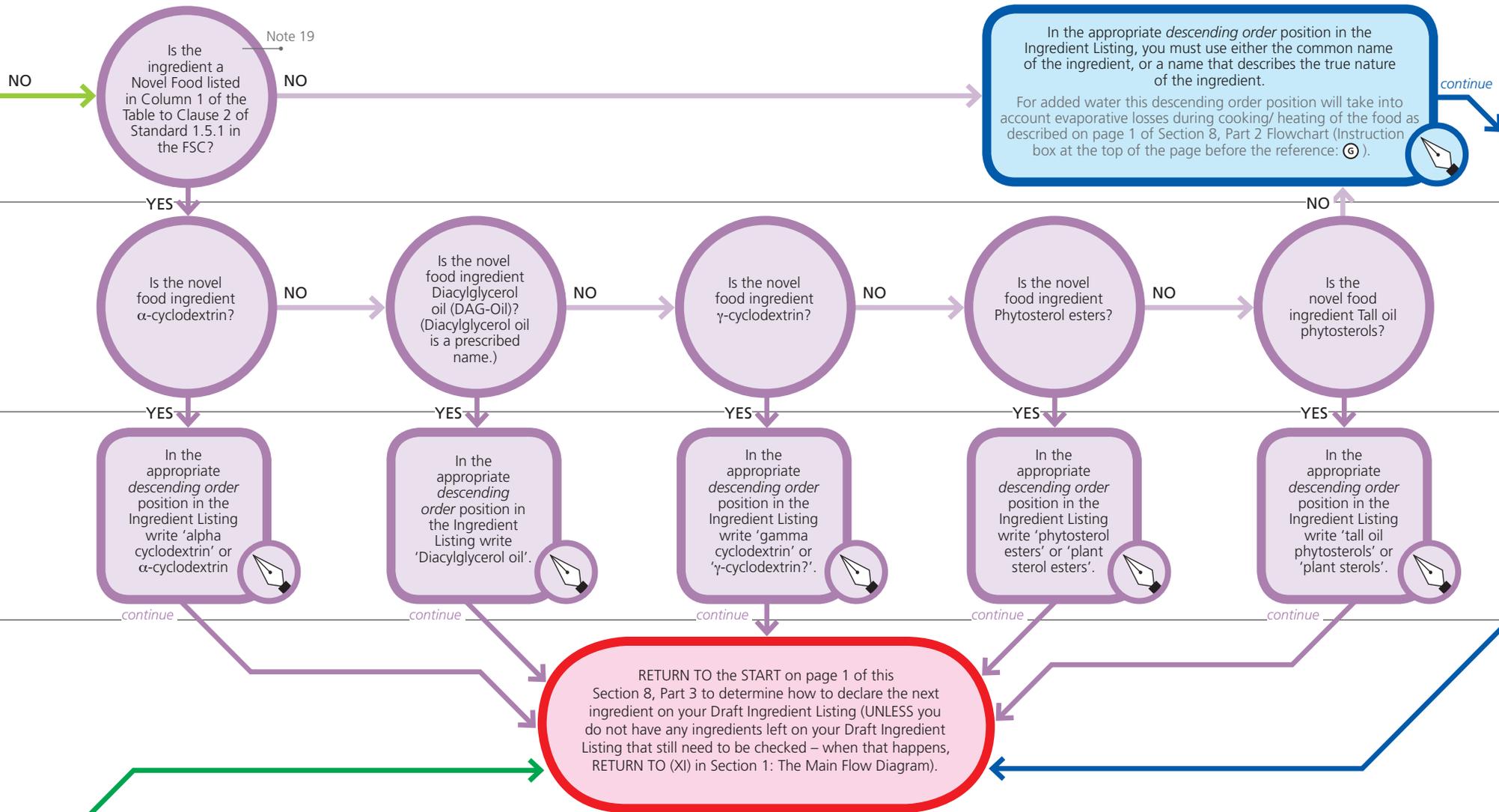
 Questions relating to alcoholic beverages











NB13

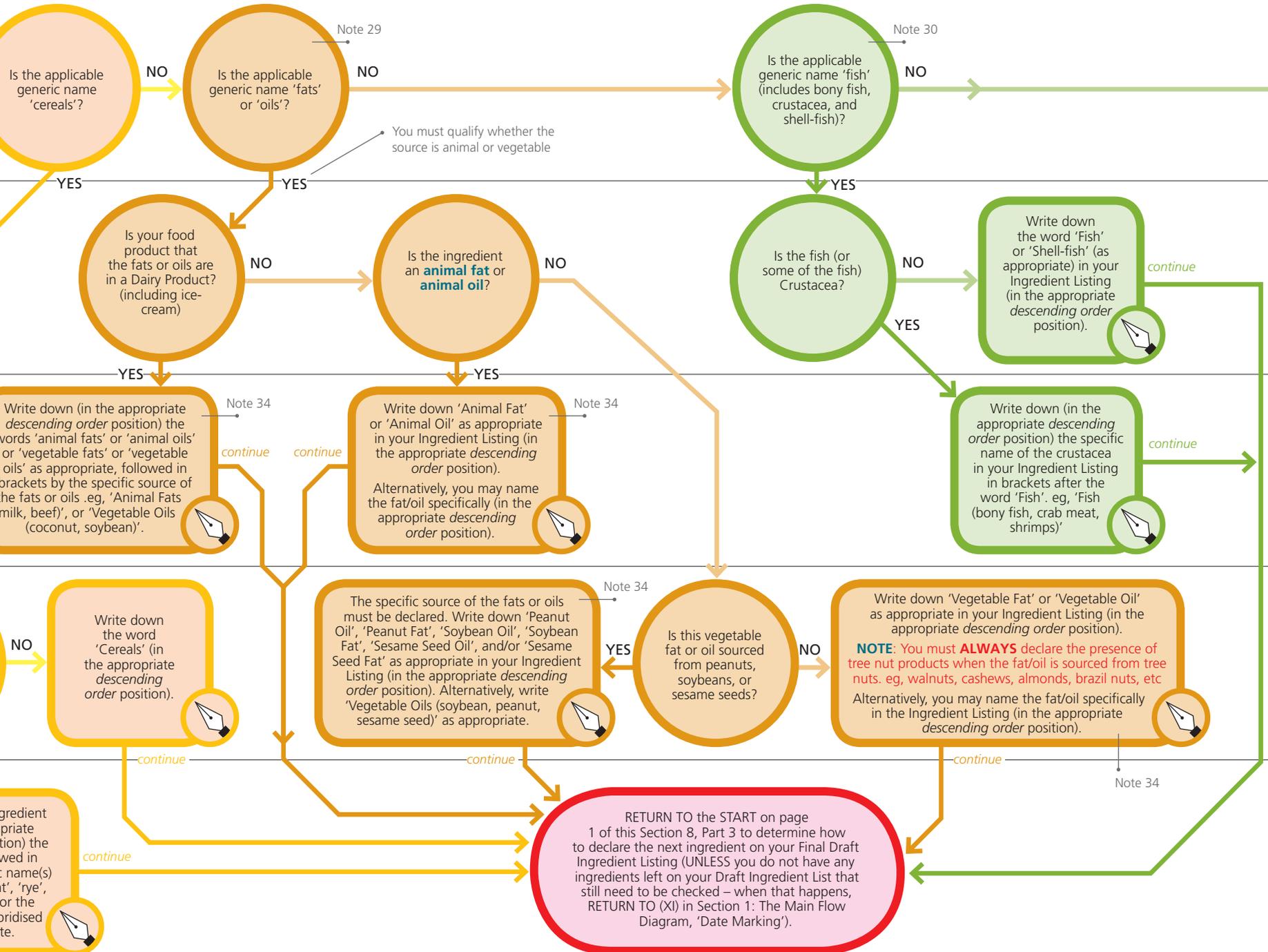
NOTE: When the Sulphite additives (with additive code numbers from 220 to 228 inclusive), such as Sulphur dioxide (220), Sodium metabisulphite (223) or Potassium sulphite (225) for example, are added to foods, such that 10mg/kg or more is present in the final food product, then the presence of added sulphites needs to be declared specifically on the label. This is because sulphites are a food intolerance substance that is required by Clause 4 of Standard 1.2.3 of the FSC to always be declared (when the levels are 10mg/kg or more) [refer back to Section 7 regarding this] eg, in the case of the above examples when they act as preservatives in the food, this could be achieved by declaring the additive in the Ingredient Listing as either:
 Example 1: 'Preservative (sulphur dioxide)' or 'Preservative (220) [added sulphite]' RATHER THAN as just 'Preservative (220)'
 Example 2: 'Preservative (sodium metabisulphite)' or 'Preservative (223) [added sulphite]' RATHER THAN as just 'Preservative (223)'
 Example 3: 'Preservative (potassium sulphite)' or 'Preservative (225) [added sulphite]' RATHER THAN as just 'Preservative (225)'

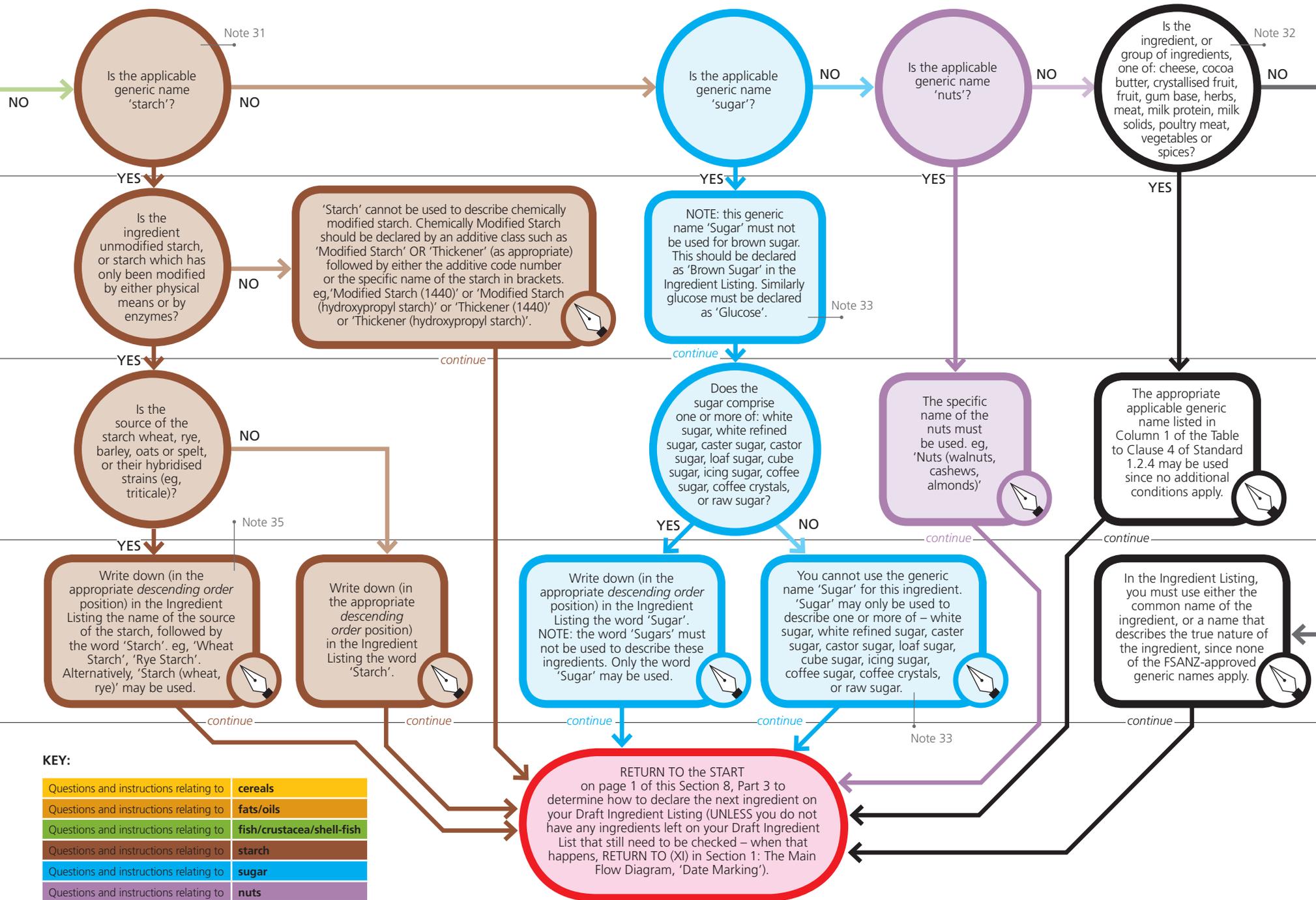
KEY:

-  Questions and instructions relating to 'additives', including flavours, vitamins/minerals and enzymes
-  Questions and instructions relating to 'Novel Food', ingredients

FROM Page 1
of Section 8,
Part 3

Note 28
[IMPORTANT]





KEY:

Questions and instructions relating to	cereals
Questions and instructions relating to	fats/oils
Questions and instructions relating to	fish/crustacea/shell-fish
Questions and instructions relating to	starch
Questions and instructions relating to	sugar
Questions and instructions relating to	nuts

- 1) Ensure you have read ALL of Section 8, Part 0 FIRST.
- 2) eg, you would still need to declare any allergens (substances listed in the Table to Clause 4 of Standard 1.2.3 of the FSC) on the label even when an Ingredient Listing is not required.
- 3) Refer to Appendix 2 for how to determine the surface area of your package.
- 4) Descending order of ingoing weight means that the ingredients are listed in decreasing order of their weight, starting with the ingredient present in the largest amount and ending with the ingredient used in the smallest amount.
- 5) In most cases it would be misleading if ingredients, included in the NAME OF THE FOOD, were not in descending order, since that is probably what most purchasers would expect. ie, they would expect there to be more of the ingredient that's mentioned first in the NAME OF THE FOOD. eg, if the product were named 'Apple and Apricot Puree' there must be more apple puree than there is apricot puree in the product. You would not be able to name the product 'Apricot and Apple Puree' if there is more apple puree than there is apricot puree.¹³
- 6) Since the ingredient listing would be identical to the NAME OF THE FOOD, the duplication would be futile. eg, if the FOOD NAME is Apple Juice and the product is 100% pure apple juice with nothing else added. However, if an additive, such as citric acid, was added, then the apple juice would need an ingredient listing.¹²
- 7) There are still some other labelling requirements that are specific to these products. Refer to Section 5 for what these are.
- 8) eg, added water or alcohol, where none is left in the final product. Refer to Appendix 4 for how to determine if water or volatile ingredients are completely removed or not.
- 9) Refer to Appendix 4 for how to determine the correct position in the Ingredient Listing for the added water.
- 10) Processing aids can be a food (including water) or an additive that performs a technological purpose during the manufacture of the product, but does NOT perform a technological function in the final product. eg, water used to pump fresh peas around a factory during processing but that is drained off just prior to freezing the peas. Another example of a processing aid is an anticaking agent added to a dry ingredient so it can be conveyed to a mixer for making into a sauce product. It would not have an anticaking effect in the final liquid sauce product. However, if an anticaking agent is used in a dry powder soup mix product it would still prevent anticaking in the actual product, so it would not be a processing aid but rather would be classed as an additive in this case.¹⁴
NOTE: You must check that the processing aid is approved for use in your food for that application. Refer to Appendix 3 for guidance on how to determine if your processing aid is approved for use in your food product.
- 11) Refer to Step 9 in Section 8, Part 0. NOTE: 'Sub-ingredients' in this labelling guide refers to the ingredients which make up the compound ingredient. Refer to Appendix 1 for the definition of a 'compound ingredient'.
- 12) eg, the allergens must be declared, and the presence of raw egg or raw milk or aspartame, etc would require advisory statements (refer back to Section 7). GM content (novel DNA/Protein) in the processing aid, must also be declared if it remains present in the food product. (refer to Section 13).

- 13) NOTE: Any warning or advisory statements or substances required to be declared by Section 7 associated with the sub-ingredient must still be declared on the label. eg, the allergens.
- 14) Refer to Appendix 1 for what defines a flavour or flavouring, eg, none of vinegar, salt and sugar can be classed as flavours since they have exclusively either a sour, salt or sweet taste.
NOTE: One of the requirements to qualify as a 'flavour' is that it must be used in SMALL amounts.
- 15) In order to answer this question you must check any alcoholic beverage used against the Section 8, Part 1 Flowchart as though the alcoholic beverage is itself a product, rather than an ingredient. If Section 8, Part 1 determines that the alcoholic beverage DOES need an ingredient listing, then the answer to this question will be 'no'. The answer will also be 'no' if the compound ingredient is NOT an alcoholic beverage.
- 16) Your supplier of this compound ingredient may be able to help advise you on this.
- 17) NOTE: This exemption from declaring the additive does not apply to substances (such as the allergens) required to be declared by Section 7 that are associated with the additive. eg, if the preservative, Sulphur dioxide (additive code number 220), were present at 10mg/kg or more in the final food product, the presence of added sulphites would need to be declared specifically on the label, regardless of whether or not it performs a technological function in the final product. ie, by including, on the label, a statement such as: 'Contains added sulphites' OR 'Preservative (Sulphur dioxide)' [rather than 'Preservative (220)'].
- 18) NOTE: Added Vitamins, Minerals, Flavourings and Enzymes are all considered to be additives for the purpose of this flowchart. Some spices may also be classed as additives too, eg, when turmeric is acting as a colour it must be declared as an additive. In this case, it would be declared as either 'Colour (turmeric)' or 'Colour (100)'.
The Schedule to Standard 1.1.1 in the FSC lists all the vitamins and minerals. Schedule 2 to Standard 1.2.4 in the FSC lists all the food additives together with their code numbers (except for 'flavouring' and 'enzyme').
- 19) Refer to Appendix 1 for the meaning of 'Novel Food'.
NOTE: Use of any Novel Food ingredient must comply with the corresponding conditions in Column 2 of the Table to Clause 2 of Standard 1.5.1 in the FSC.
- 20) Check both the 'prescribed' AND 'optional' class names.
[When Vitamins or Minerals are performing one of these functions in the food, you must answer Yes to this question – see Note 21.]
Food additives are grouped into classes according to their function. The additives have specific code numbers assigned to them. eg, most of the additives that perform a 'preservative' function have code numbers between 200 and 283 inclusive. The NZFSA booklet "Identifying Food Additives" provides guidance on which additives perform each technological function. This booklet is available from the NZFSA website: www.nzfsa.govt.nz.

Sometimes the additive you are using will not perform ANY of the functions listed in Schedule 1 of Standard 1.2.4 of the FSC in your food. Schedule 5 to Standard 1.3.1 of the FSC lists ALL the technological functions that additives are allowed to perform in foods. Schedule 1 to Standard 1.2.4 of the FSC contains just a sub-set of these functions. If your additive is not performing any of the Schedule 1 to Standard 1.2.4 functions, then your answer to this question must be 'No'.

- 21) eg, Vitamin C (ascorbic acid) usually acts as an antioxidant, acid or acidity regulator in foods. It cannot be declared as a vitamin when it is performing one of these functions – it must be declared as an additive, eg, if it were being used as an antioxidant, declare it as either 'antioxidant (ascorbic acid)' or 'antioxidant (300)'.
- 22) The specific name of the additive is used because it does not perform ANY of the functions listed in Schedule 1 of Standard 1.2.4 in your food.
eg, when desiccated coconut is produced, sodium metabisulphite, which is also a commonly used preservative, is added to the fresh coconut to make it retain its natural white colour when dried. In this instance, the sodium metabisulphite is acting as a colour fixative rather than as a preservative (In this case, the drying step does the preserving, not the additive). This is a permitted use of the additive, since 'Colour Fixative' is listed in Schedule 5 to Standard 1.3.1. However, there is no 'Colour Fixative' class name listed in Schedule 1 to Standard 1.2.4, so it cannot be declared using 'Colour Fixative' in the Ingredient Listing. In this case, the additive would simply be declared as 'Sodium Metabisulphite' in the desiccated coconut's Ingredient Listing. [Also, added sulphites must always be declared – refer to **NB13** on the flowchart].
Another example is additives that act as 'propellants' that are used in food products such as aerosol cream or non-stick cooking spray (eg, carbon dioxide and butane). Since the class name 'Propellant' is not included in Schedule 1 to Standard 1.2.4 of the FSC, propellants must be listed in the Ingredient Listing by their specific name (eg, carbon dioxide) – rather than using the class name 'Propellant' followed by the code number or name in brackets.¹⁵
- 23) NOTE: Caffeine is only permitted to be added to Kola-type Drinks and to Formulated Caffeinated Beverages.
- 24) Some additives may perform more than one technological function in a particular food – you must choose the one that is the most appropriate. Your additive's supplier should be able to provide you with information regarding which of the technological functions your additive is performing in your food product.
Also, the Editorial Note (not legally binding) after Schedule 1 to Standard 1.2.4 in the FSC explains that: *'wherever possible the prescribed class names listed in Schedule 1, rather than the optional class names, should be used for declaring food additives in the Ingredient List.*
Permission to use the optional class names... has been retained to allow the continued use of internationally accepted food labelling practices.'
- 25) These code numbers represent flavour enhancers as follows: L-glutamic acid (620), monosodium L-glutamate (621), monopotassium L-glutamate (622), calcium di-L-glutamate (623), monoammonium L-glutamate (624), magnesium di-L-glutamate (625), disodium guanylate (627), disodium inosinate (631), and disodium 5-ribonucleotides (635).

- 26) If the Flavour Enhancer is the ONLY Flavouring Ingredient, then the word 'flavouring' can be deleted. eg, you just need: 'Flavour Enhancer (620)'.
- 27) The code number may be preceded by the letter 'E' – refer to the definition of 'code number' in Appendix 1.
- Examples:
'Colour (160a)', or 'Colour (E160a)', or 'Colour (annatto extracts)'; 'Thickener (1440)', or 'Modified Starch (1440)', or 'Modified Starch (hydroxypropyl starch)'; or 'Colour (160a, 100)', or 'Colour (annatto extracts, turmeric)'; 'Emulsifier (**Soybean** Lecithin)', or 'Emulsifier (322) [from **Soybeans**]'.
[Refer to **NB13** also]
- 28) NOTE: (1) Compound Ingredients that have a Generic Name and are present at 5% or more of the final food must still have all their constituent sub-ingredients declared. eg, 'Cheese (**milk**, cultures, salt, rennet)'. Similarly, Compound Ingredients having a Generic Name, that are present at less than 5% of the final food, must still declare any additives that perform a technological function in the final product, eg, for glacé cherries used as a decoration on top of an iced cake: 'Crystallised Fruit (preservative (202, 223), colour (124), flavour)' [in this application the additives in the glacé cherries would still fulfil their technological purpose when sitting on top of the cake, just as they would if they were still in their pack].
(2) Also, any allergens present in a generic-named ingredient **must always** be declared – refer to Section 7).
- 29) Refer also to the question on page 2 of this Section 8, Part 3, '*Is the ingredient a Novel Food listed in Column 1 of the Table to Clause 2 of Standard 1.5.1 in the FSC?*'. ie, 'Diacylglycerol oil' must be declared specifically in the Ingredient Listing.
- 30) **IMPORTANT:** Refer to the definition of 'Fish' in Appendix 1, under the words or Terms Specific to Standard 2.2.3.
- 31) NOTE: The generic name 'Starch' may only be used for any unmodified starch or any starch which has been modified by either physical means or enzymes. 'Starch' **cannot** be used to describe chemically modified starch. Chemically Modified Starch should be declared by an additive class such as 'Modified Starch' OR 'Thickener' (as appropriate) followed by either the additive code number or the specific name of the starch in brackets. eg, 'Modified Starch (1440)' or 'Modified Starch (hydroxypropyl starch)' or 'Thickener (1440)' or 'Thickener (hydroxypropyl starch)'.
- 32) Spices such as Saffron and Turmeric may act as a colour. If this was the case, you could not declare them using the generic name 'Spices', but rather would need to declare them as 'Colour (164)' or 'Colour (saffron)'; and 'Colour (100)' or 'Colour (turmeric)'.
- 33) eg, brown sugar, glucose, and fructose, must be declared specifically.
- 34) You must also refer to the Section 5 product-specific requirements for fats and oils, eg, if the fat or oil is hydrogenated or partially hydrogenated you will need to specify this if the fat/oil is named specifically. eg, 'Partially Hydrogenated Soybean Oil' or 'Soybean Oil (partially hydrogenated)'.
- 35) The specific source of these starches must be named.

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Date Marking – Standard 1.2.5

Version Control July 2007

Key to Section 9

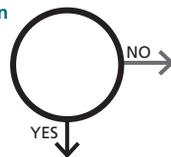
Where to start



Record



Question



Signals the end of the flowchart (may also include an instruction)

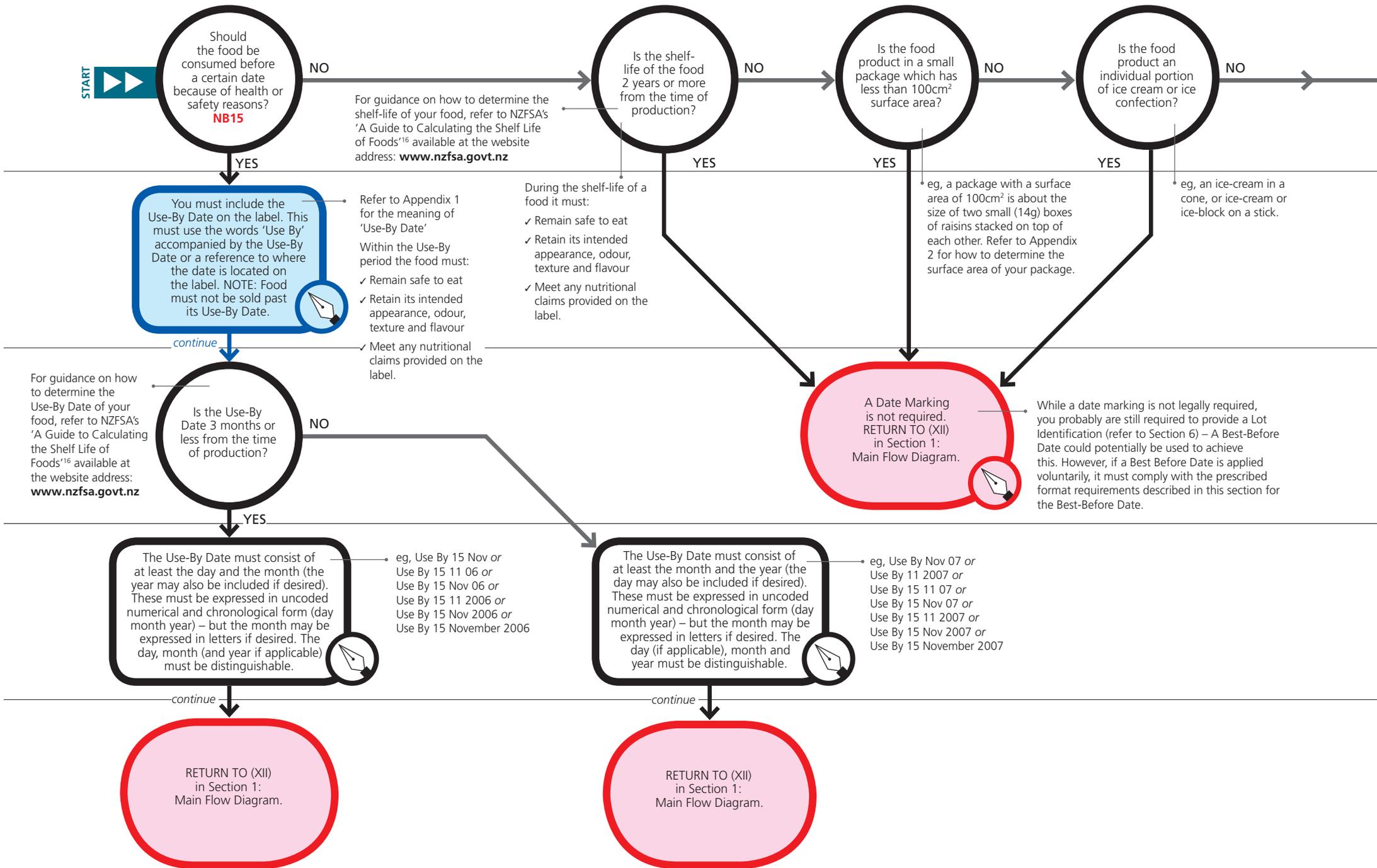


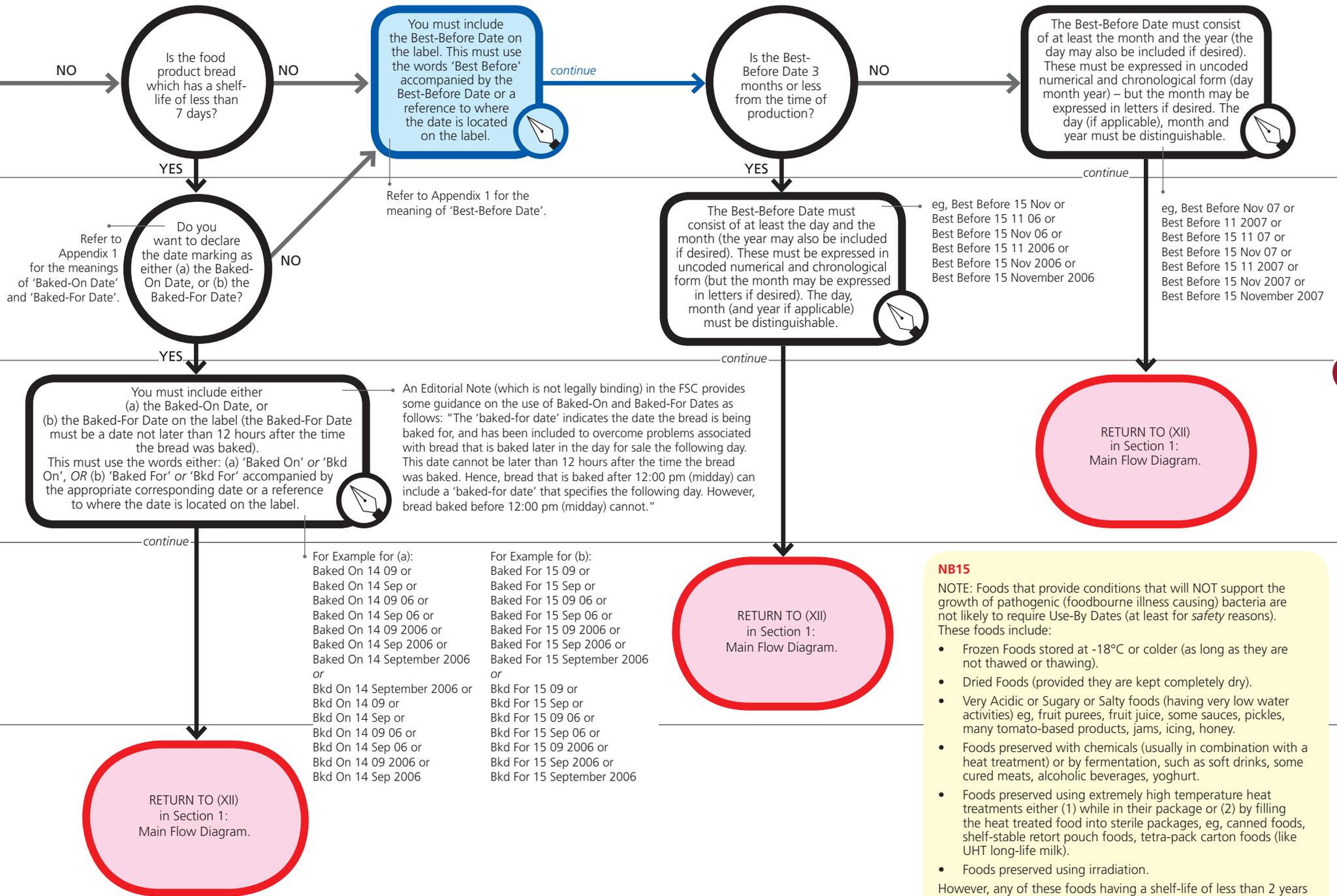
Instruction



Reference to a Supplementary note elsewhere on the page eg, NB15

NBx





NB15

NOTE: Foods that provide conditions that will NOT support the growth of pathogenic (foodborne illness causing) bacteria are not likely to require Use-By Dates (at least for safety reasons). These foods include:

- Frozen Foods stored at -18°C or colder (as long as they are not thawed or thawing).
- Dried Foods (provided they are kept completely dry).
- Very Acidic or Sugary or Salty foods (having very low water activities) eg, fruit purees, fruit juice, some sauces, pickles, many tomato-based products, jams, icing, honey.
- Foods preserved with chemicals (usually in combination with a heat treatment) or by fermentation, such as soft drinks, some cured meats, alcoholic beverages, yoghurt.
- Foods preserved using extremely high temperature heat treatments either (1) while in their package or (2) by filling the heat treated food into sterile packages, eg, canned foods, shelf-stable retort pouch foods, tetra-pack carton foods (like UHT long-life milk).
- Foods preserved using irradiation.

However, any of these foods having a shelf-life of less than 2 years will require Best-Before Dates, unless they're specifically exempted.

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Storage Directions and Directions for Use and Storage

– Standards 1.2.5 and 1.2.6

Version Control July 2007

Key to Section 10

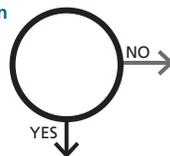
Where
to start



Record



Question

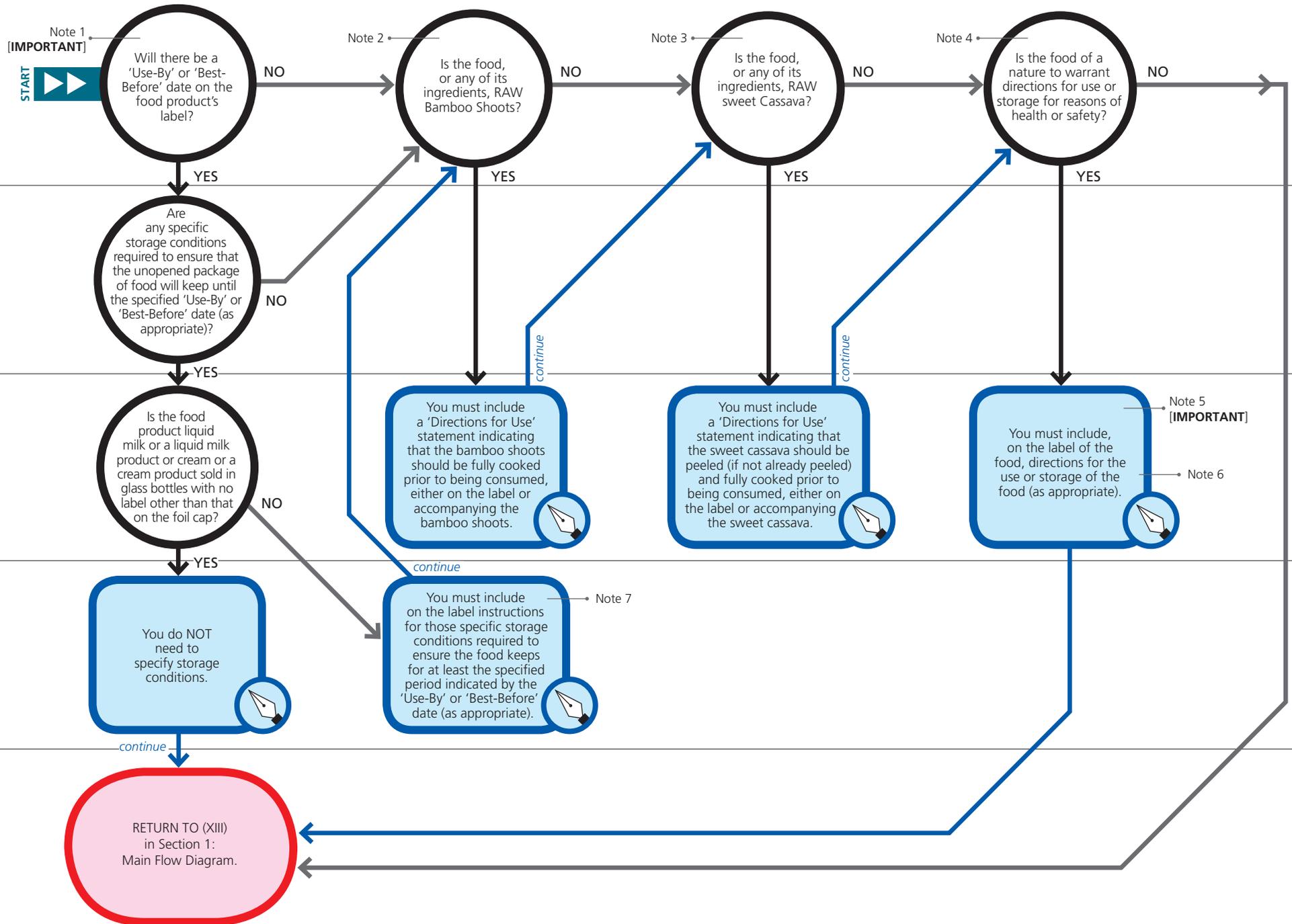


Signals the end
of the flowchart
(may also include
an instruction)



Instruction





- 1) Refer to the flowchart in Section 9 first to determine if a 'Use-By' or 'Best-Before' date is required.
Even if Section 9 indicates that a 'Use-By' or 'Best-Before' date is not required and you decide to include one of these voluntarily on your label, you should answer yes to this question.
- 2) Note that fully processed products, eg, canned product, would not be considered 'raw' since they have been thoroughly heat treated.
- 3) Note that fully processed products, eg, cassava/tapioca flour, tapioca pudding, cassava chips, would not be considered 'raw' since they have been thoroughly heat treated.
- 4) EXAMPLES: Raw foods which must be cooked before they can be consumed safely. Foods designed for immune-sensitive populations like infants and the elderly, which require especially hygienic handling. Chilled perishable foods which could become microbiologically unsafe if they are not stored correctly (eg, cooked chilled ready-to-eat products such as prepared meals, or cold cuts of meat). Foods which have to be thoroughly reheated before they can be consumed safely. Low-acid canned foods that lose their sterility once opened.
- 5) NOTE: Product-Specific Use and/or Storage Instructions may be required for certain foods – refer to Section 5 of this labelling guide to check whether your food product is one of these foods.
- 6) EXAMPLES: Cooking instructions for raw meat products, and partially-cooked fish and meat, eg, meat patties.
For Infant Formula Products, instructions to ensure the correct dilution and correct quantities are fed to the infant, as well as instructions for how to prepare the feeds hygienically, would be required.
Storage Instructions for Frozen Foods which may become microbiologically unsafe if thawing occurs. eg, 'Keep FROZEN at -18°C or Colder. Thaw overnight in the refrigerator (4°C). Once thawed, keep refrigerated, do not re-freeze and use within 4 days.'
- 7) *eg, for chocolate biscuits* – 'STORE unopened in a cool, dry place, away from direct sunlight'.
eg, for a frozen product – 'Keep FROZEN at -18°C or Colder.' *OR for perishable products, which would spoil quickly if not chilled, like fresh meat, fish, dairy products, and other pasteurized products* – 'STORE in the Fridge at 4°C or colder'.

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Nutrition Information Panel (NIP)

– Standard 1.2.8

Version Control July 2007

Key to Section 11

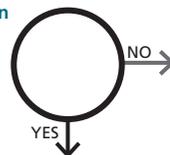
Where to start



Record



Question



Signals the end of the flowchart in the applicable part (may also include an instruction)



Instruction



Relates to small packages



Reference to a Supplementary note elsewhere on the page eg, NB16

NBX

Background

Most packaged foods require a Nutrition Information Panel (NIP), but there are *some* exceptions (these are covered in Section 11, Part 1). However, when a Nutrition Claim is made for an exempt food, the exemption is revoked and a Nutrition Information Panel is then required. The meaning of **Nutrition Claim** is given in Appendix 1. The Nutrition Information Panel provides consumers with valuable information about the nutritional value of the food and allows them to make comparisons between similar foods. For this reason, the format for the Nutrition Information Panel is prescribed by the FSC. This means that the units that must be used in the NIP (eg, kJ, g, mg) are all defined in the FSC, and the NIP must appear on your food product's label in exactly the same format as shown in the FSC (ie, with Energy and the nutrients listed in the same order, same placement of other wording and borders). Refer to Appendix 6 in this labelling guide for the various formats required depending on the type of Nutrition Claim made *[if any]*. Standard 1.2.8 of the FSC specifies the labelling provisions for Nutrition Information Panels. Standard 1.3.2 also covers labelling requirements for when nutrition claims for Vitamins or Minerals are made. Standard 2.6.2 specifies some additional nutrition and composition labelling requirements for Electrolyte Drinks and Electrolyte Drink Bases. Standard 2.6.4 does the same for Formulated Caffeinated Beverages. Standards 2.9.1 and 2.9.2 outline the specific nutrition information labelling requirements for Infant Formula Products and Foods for Infants respectively. Standard 2.9.3 details the particulars of additional nutrition and composition information labelling requirements that apply to Formulated Meal Replacements and Formulated Supplementary Foods. Similarly, Standard 2.9.4 sets out those additional information requirements for Formulated Supplementary Sports Foods, including when a vitamin or mineral claim is made. [NOTE: The specific NIP requirements covered by the Transitional Standard 1.1A.6 for Special Purpose Foods are outside the scope of this Labelling Guide].

This Section 11 is divided into Three Parts (including this Part 0):

- This Part (Part 0) explains how to use the other Parts (Part 1 and Part 2) in order to compile the Nutrition Information Panel, if required, for your food.
- Part 1 helps you to determine whether or not you need to have a Nutrition Information Panel on your food product's label (in most cases you will, but some foods, such as single ingredient foods comprising only one of: fruit, vegetables, meat, poultry, or fish, do not require a Nutrition Information Panel). [NOTE: If you make a nutrition claim about your food (including on a label or in an advertisement), you will need a NIP regardless of any exemptions that might otherwise apply].
- Part 2 helps you to determine which nutrients and/or biologically active substances need to be included in your Nutrition Information Panel and also the other information required, such as energy (in kJ), serving size, and number of servings (see next sub-section).

You will also need to refer to Appendix 6 to determine the FORMAT for your Nutrition Information Panel.

What Information is required in a NIP?

The minimum information required in the NIP (when no nutrition claims are made) is as follows:

- **Energy**¹ (in kJ or **both** kJ and kcal) – the average quantity per serving, and the average quantity per 100g (or per 100mL for liquid foods²)
- **Protein**¹ (in g) – the average quantity per serving, and the average quantity per 100g (or per 100mL for liquid foods²)
- **Total fat**¹ (in g) – the average quantity per serving, and the average quantity per 100g (or per 100mL for liquid foods²)
- **Saturated fat**¹ (in g) – the average quantity per serving, and the average quantity per 100g (or per 100mL for liquid foods²)
- **Carbohydrate**¹ (in g) – the average quantity per serving, and the average quantity per 100g (or per 100mL for liquid foods²)
- **Sugars**¹ (in g) – the average quantity per serving, and the average quantity per 100g (or per 100mL for liquid foods²)
- **Sodium**¹ (in mg or **both** mg and millimoles) – the average quantity per serving, and the average quantity per 100g (or per 100mL for liquid foods²)

- **Total Number of Servings** in the pack, **OR Number of Servings per kg** (or other units as appropriate) for **variable**³ weight or volume packages³, and
- The Average **Serving Size** (in g for solids or semi-solid foods, or in mL for liquid foods²).

FOOTNOTES:

1. Refer to Appendix 1 for definitions of all of these Nutrients and the term, **Energy**.
2. Examples of liquid foods include beverages, thin sauces and vegetable oils.
3. For example, the retail marinated meat and marinated poultry packs in the chiller-cabinet at supermarkets are typically variable weight packages.

This minimum information required (when nutrition claims are NOT made) will be referred to in this labelling guide as the **Standard NIP** and the format required for this information, as it must appear on food labels, is shown by Example (A) in Appendix 6 of this labelling guide.

Notice that all the values must be averages, and you need to indicate this somehow in your NIP. For example, you could include the abbreviation **Ave** before the word **Quantity** in both the **Per Serving** and **Per 100g (or Per 100mL)** columns (as is shown in the examples in Appendix 6), or you could use an asterisk (*) with a footnote below the NIP explaining that all values are averages. **However, there is one exception to this.** For certain edible oils and edible oil spread products (including margarine), when a claim is made in relation to their polyunsaturated or monounsaturated fatty acid content, the fatty acid components (eg, trans, polyunsaturated, monounsaturated fats) may be expressed as minimums or maximums rather than as averages (however, the total fat content must still be expressed as an average quantity).

The Serving Size must be Realistic

The Average Serving Size must be realistic for the type of food in question. Otherwise the nutrition information would be misleading and so would not comply with Fair Trading Legislation or the Food Act. For example, 100g of spaghetti bolognese (under 1/2 cup) would not be acceptable as the serving size since most people would expect a serving to be much more than that. 350g would be a more realistic serving size in this case. Similarly, a serving size amounting to four potato crisps for a small (typically single-serve) bag of potato crisps is unrealistic. Likewise, a serving size of 100mL for

beverages or soups would not be realistic, since most people would expect the serving size for these to equate to one glass or one metric cup (250mL). It is preferable to have a **whole numeral** number of servings per package (eg, 2.5 serves is confusing and probably not realistic – you should make it either 2 serves or 3 serves and adjust the serving size accordingly).

Also, if your serving size happens to be 100g (or 100mL as appropriate), you still need to have BOTH the **Ave Quantity Per Serving** AND **Ave Quantity Per 100g (or 100mL if appropriate)** columns in the NIP. Just having the **Ave Quantity Per 100g (or 100mL if appropriate)** column is NOT sufficient since the two-column format is prescribed.

An Extended Nutrition Information Panel is generally required if a Nutrition Claim is Made

Refer to Appendix 1 for the meaning of the term **Nutrition Claim**. Certain Nutrition Claims made on food labels or in advertising, trigger the need for additional nutrition information to be provided in the NIP. Examples of the extended information required for various Nutrition Claim scenarios are provided by the examples shown in (B) to (L) inclusive in Appendix 6. The Flowchart in Section 11, Part 2 will direct you to the correct example or examples depending on the claim or claims made. If more than one type of nutrition claim is made, you must combine the formats shown in all the examples corresponding to the claims, without repeating any of the nutrients, nutritive substances (eg, vitamins and minerals) or biologically active substances in the NIP. That is, each nutrient, nutritive substance or biologically active substance must appear only once in the NIP. This is why, apart from the last instruction boxes (oval-shaped), there is an arrow leaving from every instruction box (rectangular-shaped) that explains what needs to be included in the NIP for one type of claim or case, directing you to the next question (circle-shaped) which is asking about another type of claim or case. Consequently, **it is important that you continue on with the Section 11, Part 2 flowchart (in the direction of the arrows), whenever there is an arrow leaving from the box that you are at.**

Also, see next sub-section: **Am I allowed to make a Nutrition Claim?**

Am I allowed to make a Nutrition Claim?

For most Nutrition Claims certain conditions must be met before the claim is permitted by the FSC. These conditions are outlined in the Table in Appendix 7, together with some typical examples of claims of that type. It should also be noted that, in order to comply with Fair Trading Legislation or the Food Act, the claim must be valid. ie, you must be able to substantiate all claims associated with your food product with supporting evidence such as laboratory test results and/or reputable scientific literature. In addition, **claims should not be misleading**. For example, they should not suggest or imply that your food product has superior nutritional value to competitor's products that have equivalent nutritional value (for example, a claim should not suggest that one brand of Oat Bran is high in fibre, eg, 'XYZ High Fibre Oat Bran', when most competitor's brands of Oat Bran would similarly be high in fibre, since such a claim may suggest otherwise. A better way of stating this would be 'Oat Bran is a high fibre food', since it makes it clear that the whole class of Oat Bran foods are high in fibre). Another example is that you shouldn't imply that a food has certain nutritional benefits when it does not (for example, a claim such as '90% fat free', while it may be accurate for the food in question, may imply that the food is low in fat, when in fact it contains 10% fat and would generally not be considered to be a low-fat food. Foods having less than 3% fat are more likely to be thought of as being low in fat. Similarly, 'high fibre' type claims should not be made unless the food contains at least 3g of dietary fibre per serving). Further guidance on when Nutrition Claims may be appropriate can be obtained from the repealed '**New Zealand Food Regulations 1984**' [see your local Public Health Unit for access to a copy] or the '**Code of Practice on Nutrient Claims on Food Labels and in Advertisements**' (Jan 1995), which was developed for the Australian Food Industry as a means of voluntarily self-regulating Nutrition Claims. This document, which is not legally binding, is available from the FSANZ website (via a link from our website: www.nzfsa.govt.nz).

How do I obtain the Nutrition Composition Values required for my Product's NIP?

The nutrition information can be obtained in several ways, including:

- By laboratory testing representative samples of the food and averaging the results. This is probably the most product-specific method, but is also usually the most costly. In addition, it has to be redone if the recipe changes. It is important to check the FSC definitions of the various nutrients and the energy factors etc and specify these to the laboratory when requesting laboratory analysis, since testing methods and calculations used by laboratories can vary (eg, some laboratories do not include the energy contributed by dietary fibre in their calculation of Energy, whereas the FSC requires that this contribution be included).
- By performing manual calculations based on the food product's recipe (proportion of each ingredient in the food product) and laboratory analysis nutrition data for each ingredient (including additives) used. You also need to know the weight of water or volatile ingredients lost by evaporation during heating for cooked products (this will be the difference between the product's weight before and after cooking). Many ingredients have been analysed already with the nutrition information available from published databases. This method generally costs less than laboratory testing of samples, and is more flexible (if the recipe changes just recalculate), but results may not be as representative (product-specific) as laboratory testing results. If this method is chosen it can be helpful to set up a spreadsheet to handle the calculations. Alternatively, FSANZ provide a free on-line NIP Calculator that can be used to perform the calculations automatically. However, you should be aware that the FSANZ NIP Calculator uses Australian Nutrition data and while you can print-out the results, you are not able to save your work electronically (so you must start over if you change your recipe). The New Zealand Crop and Food Research Institute have published nutrition data for many New Zealand food products and food ingredients available from their website: www.crop.cri.nz

If you are not familiar with the methods described above, you could employ the expertise of Food Technology/Labeling Consultants to assist with obtaining the nutrition information for your food products. Various software packages have also been developed that are designed to calculate the nutrition information of food products.

How should the Values in the Nutrition Information Panel be Expressed?

- 1. When the Average Energy is Less than 40kJ:** If the average Energy value is less than 40kJ (either per Serving or per 100g or per 100mL (as appropriate) of the food), it may be expressed as 'LESS THAN 40kJ' in the NIP, but not as '< 40kJ'. Alternatively, you can state the actual average value, eg, '39kJ'.
- 2. When the Average Sodium or Potassium[#] is Less than 5mg:** If the average quantity of Sodium or Potassium[#] in a serving of the food or in 100g or 100mL (as appropriate) of the food is less than 5mg, then the average quantity may be expressed as 'LESS THAN 5mg', but not as '< 5mg'. 'LESS THAN 1mg' would not be acceptable either in the case of Sodium or Potassium (even if it were true).
- 3. When the Average Quantity of Other Nutrients is Less than 1g:** If the average quantity of the protein, fat, sub-group fatty acids, carbohydrates, sugars or dietary fibre[#] in a serving or per 100g or 100mL (as appropriate) of the food is less than 1g, that average quantity may be expressed as 'LESS THAN 1g' in the NIP. However, this does not mean it can be expressed as '< 1g' and 'LESS THAN 0.1g' is not acceptable either, even if the value is less than 0.1g. That is, if the average value was say, 0.02g, you would need to declare it as either 'LESS THAN 1g', or as 0.02g – it cannot be declared as 'LESS THAN 0.1g'.
- 4. The values in the NIP must be expressed to not more than three significant figures.** You can think of this as meaning no more than 3 non-zero digits for values that are more than 1, and no more than 3 decimal places for values less than 1. For example, 1348kJ of Energy must be expressed as 1350kJ. 1344kJ would be declared as 1340kJ. Similarly, 0.0012g of protein would be declared as

0.001g in the NIP. 1.283g needs to be declared as 1.28g (but could also be rounded further to be declared as 1.3g or even 1g) and so on. Another example is that 0.0037g of protein would be declared as 0.004g. That is, you must round the values up (if the next digit to the right is 5 or more) or down (if the next digit to the right is 4 or less) as appropriate to obtain no more than 3 significant figures.

#NOTE: Unless Potassium or Dietary Fibre were specifically required by a standard in the FSC to be declared in the NIP, they would be considered to be nutrition claims (ie, if they were voluntarily included in the NIP).

How to put together a Nutrition Information Panel using this Section 11:

1. Read all instructions carefully.
- 2. HOW TO USE THE FLOWCHART IN PART 1: 'Does My Food PRODUCT Require a Nutrition Information Panel (NIP)?':**
After first reading this Section 11, Part 0: 'Introduction' completely, start at Page 1 of the Section 11, Part 1: 'Does my Food Product Require a Nutrition Information Panel (NIP)?' flowchart at the place indicated by the word **START**. Working through this flowchart (following the direction indicated by the arrows) you will be able to decide if you need to have a NIP on your product. NOTE: Foods which are exempt from being fully labelled (refer to Section 3) also do not need to have a NIP, UNLESS a Nutrition Claim is made (Section 4 explains what needs to happen in that situation).
3. If the Section 11, Part 1 Flowchart tells you that you **DO NEED** a NIP for your product, then proceed to the start of the Section 11, Part 2 Flowchart.

If the Section 11, Part 1 Flowchart tells you that you do **NOT** need a NIP for your product, you can skip the remaining Section 11, Part 2 and simply return to (XV) in Section 1: The Main Flow Diagram, and continue from there.

If your product is in a small package, having a surface area of less than 100 cm² AND you intend to make a Nutrition Claim, you do not need the full NIP. However, since a claim is made, some nutrition information will still be required on the label of the small package. Section 11, Part 1 will help you to determine what these requirements are.

4. HOW TO USE THE FLOWCHART IN PART 2: 'What does the NIP on my Product's Label need to include?':

Start at Page 1 of the Section 11, Part 2: 'What does the NIP on my Product's Label need to include?' flowchart at the place indicated by the word **START**. Working through this flowchart (following the direction indicated by the arrows) you will be able to decide what food components need to be declared in the NIP. The flowchart will direct you the appropriate example format in Appendix 6. **Remember that the format is prescribed, so your NIP should be in exactly the same format as indicated by the appropriate example.**

5. When you have completed all the above steps, compile the appropriate NIP (if applicable) and record it in the Section 15 Checklist, and then return to (XV) in Section 1: The Main Flow Diagram, and continue from there.

Special Cases

(i) Dehydrated or concentrated food products intended to be reconstituted with water before consumption

Where a dehydrated or concentrated food is intended to be reconstituted with water, by following directions on the label, the NIP values MUST be for the reconstituted (ready-to-eat or ready-to-drink) product. This is mandatory. For example, soup powders or concentrates, beverage powders, jelly crystals, juice concentrates, etc. You should also make it clear that the NIP values are for the reconstituted product in order to comply with Fair Trading Legislation or the Food Act (ie, the form of the food represented by the NIP values should not be ambiguous or misleading). For example, you could title the NIP with words such as: **Nutrition Information when Reconstituted** or **Nutrition Information for the Ready-to-drink Beverage** or similar explanation.

(ii) Food that must be drained before consumption

The label on a package of food with directions indicating that the food should be drained before consumption (eg, capers or olives bottled in brine or oil), MUST clearly indicate that the NIP values relate to the drained food. This can be achieved, for example, by the addition of a title to the NIP with words such as: **Nutrition Information when Drained** or by use of asterisks (*) and a footnote stating that the Nutrition Information Values relate to the drained food.

(iii) Food that is to be prepared or consumed with other food

The label on a package of food intended to be prepared or consumed with at least one other food (eg, breakfast cereals designed to be eaten with milk, instant dessert powders intended to be mixed with milk and allowed to set before being consumed, etc), may include an additional column at the right-hand side of the panel specifying all the relevant particulars, as shown in the example below for the breakfast cereal, rice bubbles: *[Please note that the values in the first two columns on the left-hand side must be for the product itself (ie, for the rice bubbles in this example). It is only the third column that is optional]*

NUTRITION INFORMATION						
Servings per package: 9						
Serving size: 50g						
	Ave Quantity per Serving		Ave Quantity per 100g		Ave Quantity per Serving with ½ cup (125mL) of whole milk added	
Energy	802	kJ	1600	kJ	1140	kJ
Protein	2.7	g	5.4	g	7.0	g
Fat, total	0.2	g	0.3	g	4.5	g
– saturated	0.1	g	0.2	g	2.8	g
Carbohydrate	43.9	g	87.7	g	49.6	g
– sugars	18.3	g	36.5	g	24.0	g
Dietary Fibre [if included]	0.6	g				
Sodium	282	mg	564	mg	338	mg

(iv) Voluntary inclusion of Percentage Daily Intake Information

Information relating to the percentage daily intake of the nutrients set out in the NIP (including dietary fibre if included in the NIP) may be included in the panel provided the following matters are included in the NIP:

- The percentage daily intake of energy, fat, saturated fatty acids, carbohydrate, sugars, protein and sodium (and dietary fibre if included) *[Please note that you can't just include the %DI values for a single or few nutrient(s). ie, it must be either ALL of them, OR NONE of them], and*
- The statement: – **'*Percentage daily intakes are based on an average adult diet of 8700kJ. Your daily intakes may be higher or lower depending upon your energy needs.'**

As shown in the following example:

NUTRITION INFORMATION						
Servings per package: 9						
Serving size: 50g						
	Ave Quantity per Serving		% Daily Intake* (per Serving)		Ave Quantity per 100g	
Energy	802	kJ	9.2	%	1600	kJ
Protein	2.7	g	5.4	%	5.4	g
Fat, total	0.2	g	0.3	%	0.3	g
– saturated	0.1	g	0.4	%	0.2	g
Carbohydrate	43.9	g	14.2	%	87.7	g
– sugars	18.3	g	20.3	%	36.5	g
Dietary Fibre [if included]	0.6	g	2.0	%	1.2	g
Sodium	282	mg	12.3	%	564	mg
(insert any other nutrient or biologically active substance to be declared) ~		g, mg, µg (or other units as appropriate)		%		g, mg, µg (or other units as appropriate)
* Percentage Daily Intakes are based on an average adult diet of 8700kJ. Your daily intakes may be higher or lower depending on your energy needs.						

~Delete the row marked with this symbol (~) if it does not apply.

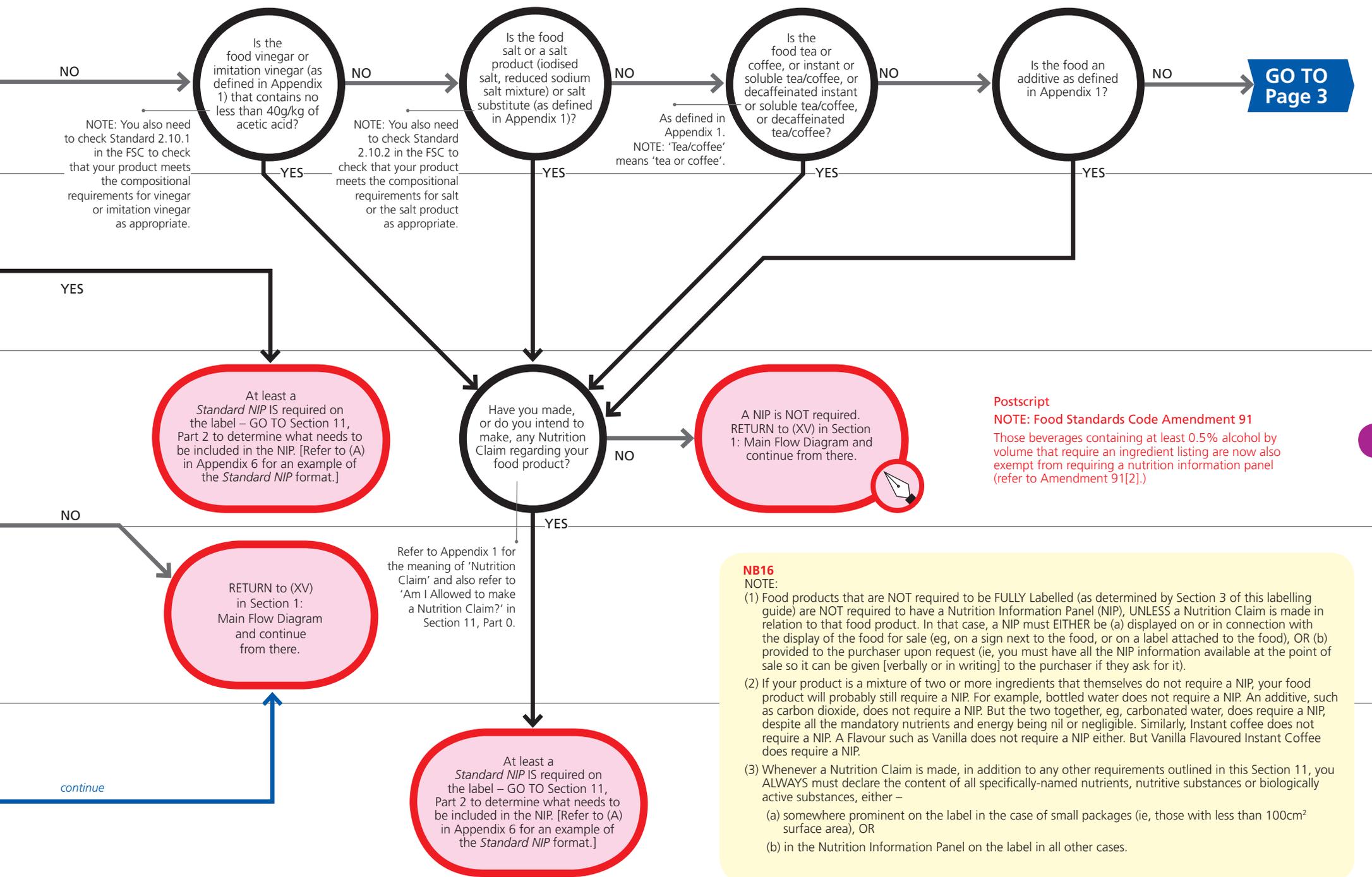
NOTE: The percentage daily intakes of the food components listed in Column 1 of the Table below, that are included in the Nutrition Information Panel, must be calculated using the corresponding reference value specified in Column 2 in the table below:

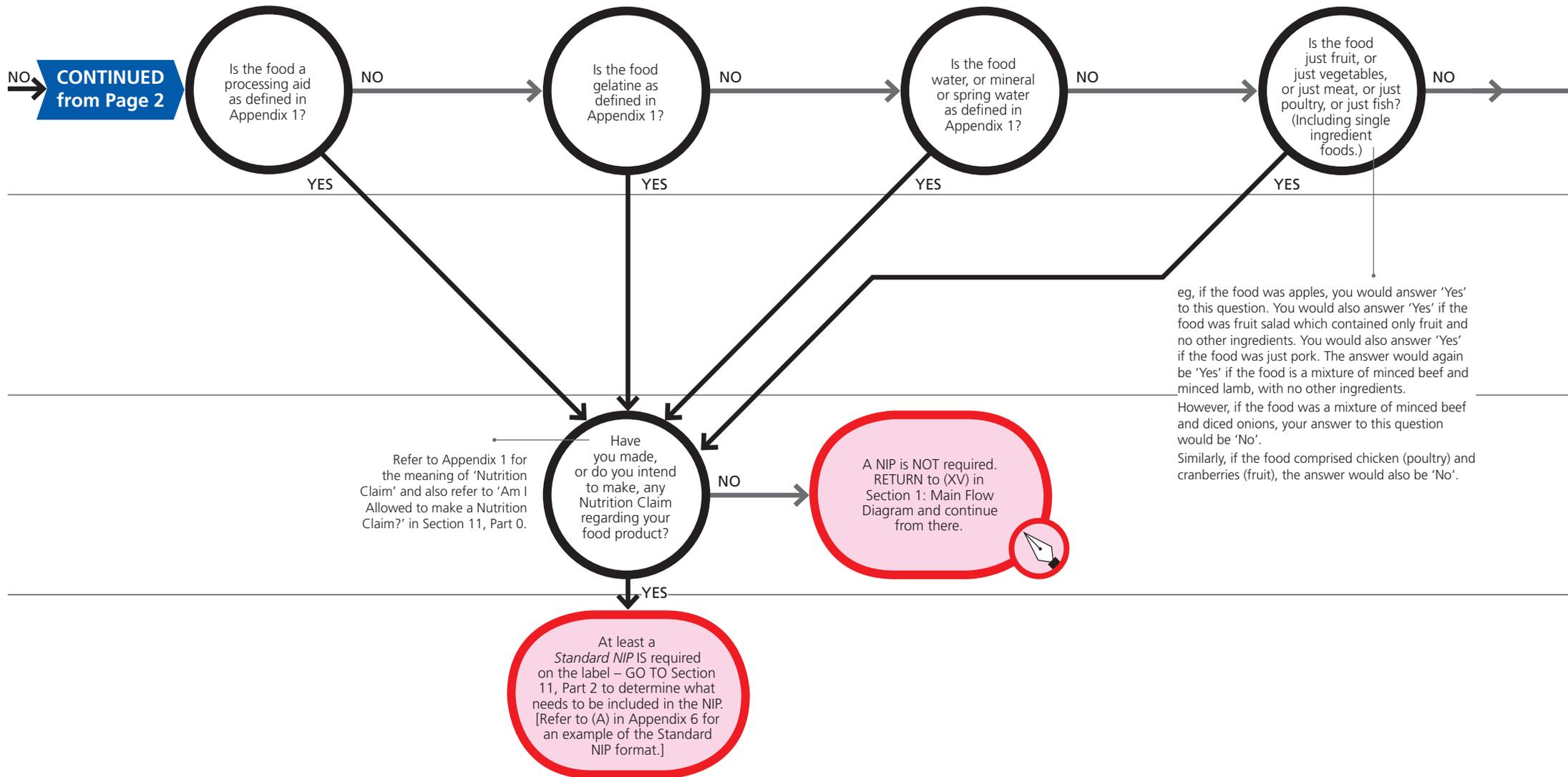
Current Reference Values as at July 2007

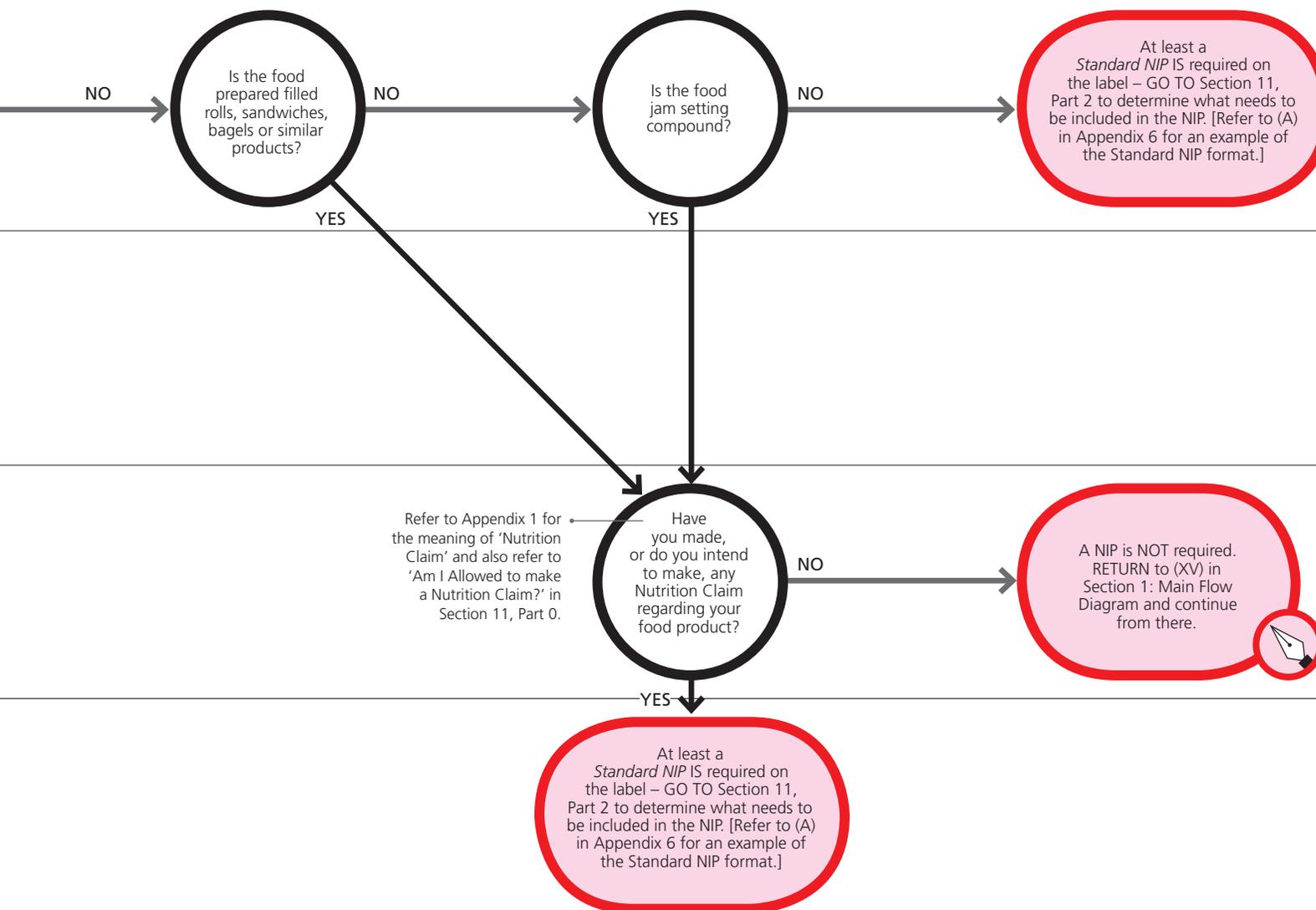
Column 1	Column 2
Food Component	Reference Value
Energy	8700kJ
Protein	50g
Fat	70g
Saturated fatty acids	24g
Carbohydrate	310g
Sugars	90g
Dietary fibre (if included)	30g
Sodium	2300mg

For example,

$$\begin{aligned}
 \% \text{ DI in a Serving for the Protein in the Rice Bubbles example above} &= \frac{\text{Weight of Protein (g) in a Serving}}{\text{Reference Value for Protein (g)}} \times 100\% \\
 &= \frac{2.7}{50} \times 100\% \\
 &= 5.4 \%
 \end{aligned}$$







START

From either the Section 4 or the Section 11, Part 1 Flowchart you have determined that a NIP is required. You will at least need to include all the Standard NIP Information, as explained in Section 11, Part 0. Use this flowchart to identify the full nutrition information requirements for your product, which will depend on:

- (a) food type, AND
- (b) carbohydrate requirements, AND
- (c) any Nutrition Claim(s) made.

Refer to (A) in Appendix 6 for an example of the Standard NIP format.

You will need to subtract the **unavailable carbohydrate** if it has been **ADDED** to your food or has been **quantified**. 'Quantified' means determined/ identified, eg, by laboratory testing or calculation.

Refer to the definition of 'Carbohydrate' in Appendix 1 for what calculating 'Carbohydrate by Difference' means.

If you answered, 'No', this means you will instead use 'Available Carbohydrate' as defined in Appendix 1.

'Quantified' means determined/ identified, eg, by laboratory testing or calculation.

Will you calculate the Carbohydrate quantity that will appear in your NIP as 'Carbohydrate by Difference'?

Are any of the food components, [a], [b], [c], [d], [e], [f], [g], [h], [i], and/or [j] [shown in **NB18**], present, either singly or in combination at 5g per 100g or more?

Will any Unavailable Carbohydrate, except for Dietary Fibre, be subtracted in the Calculation of 'Carbohydrate by Difference'?

Have any of the food components, [a], [b], [c], [d], [e], [f], [g], [h], [i], and/or [j] [**NB18**] that are present, been quantified OR added to the food?

In addition to the Standard NIP information as described in (A) of Appendix 6, you need to include the average amount (in g) of the appropriate components (ie, [a], [b], [c], [d], [e], [f], [g], [h], [i], and/or [j]) that are present in a serving of the food, and also the amount (in g) present in either 100g of the food (for solid- and semi-solid-type foods) or 100mL of the food (for liquid-type foods) as appropriate, as shown in the example (H) in Appendix 6.

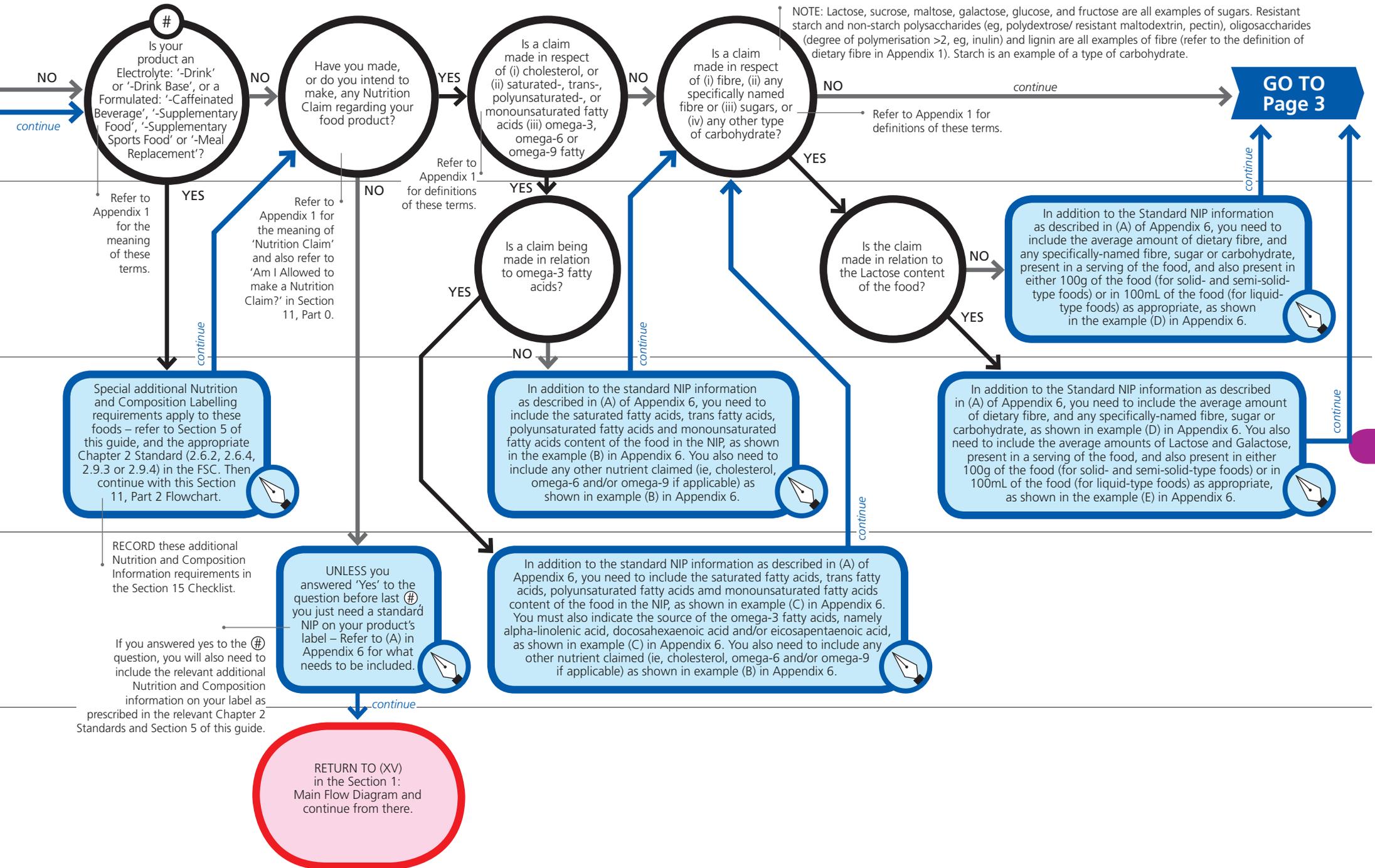
In addition to the Standard NIP information as described in (A) of Appendix 6, you need to include the average amount of Unavailable Carbohydrate that has been subtracted in the Calculation of 'Carbohydrate by Difference' (in g) present in a serving of the food, and also present in either 100g of the food (for solid- and semi-solid-type foods) or 100mL of the food (for liquid-type foods) as appropriate, as shown in the example (F) in Appendix 6.

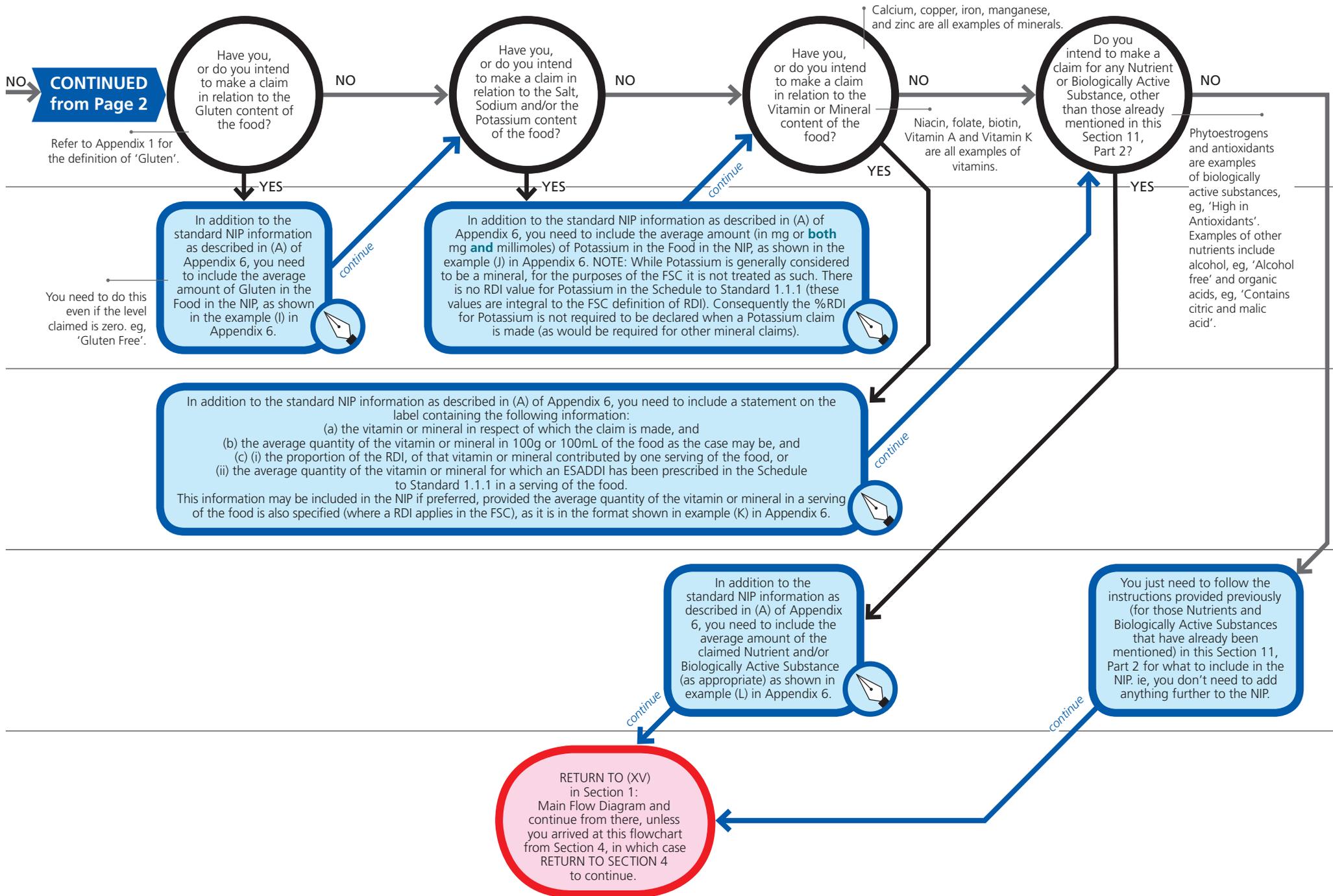
Are any of the food components, [a], [b], [c], [d], [e], [f], [g], [h], [i], and/or [j] [shown in **NB18**], present, either singly or in combination at 5g per 100g or more?

Have any of the components, [a] – [j] inclusive [**NB18**], present at 5g per 100g or more, been subtracted in the calculation of 'Carbohydrate by Difference'?

In addition to the Standard NIP information as described in (A) of Appendix 6, you need to include the average amount (in g) of the appropriate components subtracted in the calculation of 'Carbohydrate by Difference' (ie, [a], [b], [c], [d], [e], [f], [g], [h], [i], and/or [j]) that are present in a serving of the food, and also the average amount (in g) present in either 100g of the food (for solid- and semi-solid-type foods) or 100mL of the food (for liquid-type foods) as appropriate, as shown in the example (G) in Appendix 6.

- NB18**
- [a] Erythritol,
 - [b] Glycerol,
 - [c] Isomalt,
 - [d] Lactitol,
 - [e] Maltitol,
 - [f] Mannitol,
 - [g] Polydextrose,
 - [h] Sorbitol,
 - [i] D-Tagatose,
 - [j] Xylitol







Percentage Labelling – Standard 1.2.10

Background

Percentage labelling requires the proportion of 'characterising components' and 'characterising ingredients' contained in a food to be declared (normally expressed as a percentage (%)). Refer below for definitions of the terms 'characterising component' and 'characterising ingredient':

Characterising Component:

means a component of a food that –

- (a) is mentioned in the name of a food, or
- (b) is usually associated with the name of a food by the consumer, or
- (c) is emphasised on the label of a food in words, pictures or graphics.

Two examples of characterising components of food are milkfat in ice cream and cocoa solids in chocolate.

Characterising Ingredient:

means an ingredient or category of ingredients that –

- (a) is mentioned in the name of a food, or
- (b) is usually associated with the name of a food by the consumer, or
- (c) is emphasised on the label of a food in words, pictures or graphics, but does not include –
 - (d) an ingredient or a category of ingredients which is used in small quantities for the purposes of a flavouring, or
 - (e) an ingredient that is the sole ingredient of a food, or
 - (f) a category of ingredients that comprises the whole of the food, or
 - (g) an ingredient or category of ingredients which, while mentioned in the name of the food, is not such as to govern the choice of the consumer, because the variation in the quantity is not essential to characterise the food, or does not distinguish the food from similar foods.

eg, the apple in an apple pie is a characterising ingredient.

Notice that this does not mean the percentage of ALL components or ingredients is required (unless they are all 'characterising ingredients or components', which is unlikely). A component is different from an ingredient – refer to Appendix 1 for a description of what a **component** or an **ingredient** is.

Percentage labelling is required for most foods (including unpackaged foods and foods made and packaged on the premises from which they are sold), but there are a few exceptions. The purpose of percentage labelling is to reduce the need for prescriptive product-specific compositional standards, while still providing sufficient information to allow consumers to make an informed buying choice.

In this Section you must:

1. Follow the instructions provided below to determine which of your product's ingredients and/or components are characterising ingredients and/or components.
2. Calculate the proportion of these, using the methods shown, as either (a) in the case of declaring this in the Nutrition Information Panel: the average amount in g per 100g [or g per 100mL as appropriate] of the product, and average amount in g per g of serving size, OR (b) the percentage (%) of the product, in all other cases.
3. Record the results in the Section 15 Checklist. Also include the characterising percentages for your product under the other relevant Sections in the Section 15 Checklist according to where on the label they will be declared, such as the:
 - (i) Name of the Food section,
 - (ii) Ingredient Listing section, or
 - (iii) Nutrition Information Panel section, as appropriate.

When is Percentage Labelling Required?

- **When the Ingredient (or Category of Ingredients) or Component is Mentioned in the Name of the Food.** eg, the raspberries in '**Raspberry** Jam', the apple and apricot fruit pieces and/or juice in '**Apple** and **Apricot** Custard', and the beef in '**Beef** Stroganoff' are all examples of **ingredients** mentioned in the name of the food (*but the apple and apricot flavours in 'Apple and Apricot Flavoured Custard' are not characterising ingredients despite being mentioned in the name of the food, since they are only flavours used in small quantity. Refer to the exemption described in the paragraph: 'Ingredients or Category of Ingredients that are only Used in Small Quantities for Flavouring Purposes' on page 2*). A 'Category of Ingredients' is one of the generic names in the Table to Clause 4 of Standard 1.2.4 of the FSC (eg, cereals, meat, fish, vegetables). The fruit and the nuts in a '**Fruit** and **Nut** Muesli Bar' are both examples of a '*category of ingredients*' mentioned in the name of a food. The **cocoa solids** in a product named, 'High **Cocoa Solids** Premium Dark Cooking Chocolate', would be an example of a component mentioned in the name of the food.

- **When the Ingredient (or Category of Ingredients) or Component is Usually Associated with the Name of the Food by the Consumer** [ie, *expectation in his/her mind*]. This is normally the highest value **ingredient** or **component**. eg, the meat *ingredients* in 'Sausages'; cheese, salami, vegetables and tomato *ingredients* in 'Traditional Pizza'; meat, tomato, and pasta *ingredients* in 'Spaghetti Bolognese'; vegetables in a 'Spring Roll'; milk fat *component* in 'Ice-cream'; or cocoa solids *component* in 'Chocolate'. For the Tropical Sauce Product used as an example in Appendix 5, ALL the ingredients of Tropical Origin would be characterising ingredients (ie, the Coconut Cream, Mango Puree, Pineapple Juice and Mango Juice – refer to the Ingredient Listing Examples in Appendix 5, to see what the actual percentages (%) are). A good way to determine the ingredients or components *usually associated with the name of the food* is to consider what an appropriate description of the product might be¹⁸ (eg, a description suitable for a restaurant menu).

FOR EXAMPLE:

Product	Description	Characterising Ingredient or Component
Traditional Pizza ^{9, 18}	Melted mozzarella cheese, salami slices and sliced vegetables (mushroom, onion, capsicum) in a spicy tomato-based sauce over a crispy dough base.	Mozzarella cheese, salami, vegetables and tomato ingredients
Spaghetti Bolognese	Spicy garlic tomato-based minced meat sauce over a bed of spaghetti pasta.	Tomato ingredients (tomato paste, puree and pieces), meat, and pasta
Spring Rolls ^{9, 18, 19}	Shredded vegetables (carrots, cabbage, bean sprouts, spring onion) inside a deep-fried pastry case.	Vegetables
Tropical Sauce (example from Appendix 5)	A sweet-savoury cooked blend of coconut cream and tropical fruit (mango) puree and juices (pineapple, mango).	Coconut cream, mango puree, fruit juices (pineapple, mango).

- **When the Ingredient (or Category of Ingredients) or Component is Emphasised on the Label in Words, Pictures or Graphics.**

eg, statements on the label like: **"with real cream"**

where cream would be the characterising ingredient, or



where mushrooms would be the characterising ingredient. The use of a different size, colour and/or style of lettering to refer to particular ingredients or components anywhere on the label would also make them characterising ingredients or components. A picture being used to selectively emphasise one or a few ingredients or components would also make them characterising ingredients or components, eg, a drawing of a large coconut palm tree on a tropical sauce product to emphasise the coconut cream ingredient. If the picture on the label represented all the food ingredients (with the exception of minor ones like seasonings and additives), without emphasising any particular one, then they would NOT be characterising ingredients¹⁹.

NOTE: Statements that are only included on the label to comply with other FSC requirements are not considered to emphasise an ingredient or component. eg, the advisory statement, 'Contains Quinine', is required to be included on the label of a product that contains quinine, such as a tonic drink. Consequently, the percentage of quinine in the tonic drink is not required to be declared since the 'Contains Quinine' statement is not considered to be 'emphasis' (as it happens the quinine would also be exempt on the basis that it is an *ingredient used in small quantity for the purpose of a flavouring* – see below).

When is the Percentage Ingredient Labelling Not Required?

- **Ingredients or Category of Ingredients that are only Used in Small Quantities for Flavouring Purposes.** eg, the garlic in garlic bread would not be characterising since only a small amount is used to produce the flavour. Consequently, the percentage garlic does not need to be declared on the label. Similarly the basil and garlic in a 'Basil and Garlic Tomato Pasta Sauce' would not be characterising. However, the basil in 'Basil Pesto' *would be* characterising since it is the main ingredient (hence is not used in small quantities). Flavouring additives such as Vanilla Essence or Banana Flavour would not be considered to be characterising either, even in the case where these flavourings are mentioned in the name of the food. Likewise, as mentioned already, the 'Apple and Apricot Flavoured Custard' would not need to declare any characterising ingredient percentages. Ingredients used *for the purposes of a flavouring*, that are not flavour additives themselves would typically include herbs or spices or other ingredients that have a strong flavour (eg, garlic, cinnamon, and other herbs/spices, sweet chilli sauce and similar foods). The FSC does NOT define an exact level for 'small quantity', but as a guide you could perhaps use about 5% or less of the ingoing-weight as a rule of thumb, depending on your type of product.
- **Single-Category-of-Ingredient or Sole-Ingredient Foods.** eg, when the product comprises just meat, or just fish, or is 'Mixed Vegetables' (with no other ingredients), or is of one fruit '100% Pure Apple Juice'.

- **Ingredients or Category of Ingredients that, while Mentioned in the Name of the Food, would Not Govern the Choice of the Consumer, because the Variation in the Quantity is Not Essential to Characterise the Food, or does Not Distinguish the Food from Similar Foods.** eg, the percentage of potato in potato crisps would not influence the consumer to buy one brand of potato crisps over another, because the difference in potato content between brands are likely to be negligible. Consequently, the percentage potato would not need to be declared on the label, UNLESS it was much lower than normal (eg, if other cheaper ingredients were included to 'extend' the potato).^{18,19} Similarly, the percentage wheat flour in bread is not likely to affect the consumer's choice of bread product, so would not need to be declared. The dough base in Traditional Pizza, or the pastry case of Spring Rolls are also examples.
- **Ingredients Already Declared as a Characterising Component.** eg: cream *ingredient* in ice cream, where the percentage milkfat *component* is declared, or the cocoa *ingredients*, such as cocoa mass/liquor and cocoa butter, in chocolate, where the percentage cocoa solids *component* is declared. In those cases, the percentage cream, and the percentages of cocoa mass/liquor and cocoa butter would NOT need to be declared as well.
- **Foods for Catering Purposes.**
(Refer to Appendix 1 for a definition of 'Food for Catering Purposes').
- **Food in Small Packages, having a Surface Area of Less than 100cm².**
(Refer to Appendix 2 for how to determine the surface area of a package).
- **Prepared Filled Rolls, Sandwiches, Bagels and Similar Products.**
- **Infant Formula Products as Defined in Standard 2.9.1 in the FSC (including complying with compositional requirements).**
- **Alcoholic Beverages as Defined in Standards 2.7.2 to 2.7.5 inclusive in the FSC (including complying with compositional requirements), OR Beverages Containing at least 0.5% Alcohol by Volume that are NOT Defined in Standards 2.7.2 to 2.7.5 inclusive.**
- **Cured and/or Dried Meat Flesh in Whole Cuts or Pieces (Refer to Appendix 1 for the definition of these products).** eg, percentage characterising ingredients or components are not required for products such as dry-cured ham or bacon (or those having a relatively high meat content)¹⁸. Chemically preserved meat products, such as salted/pickled pork, that do NOT meet the minimum percentage meat compositional requirements (eg, those using non-meat 'fillers' and 'extenders') CANNOT be called Cured Meat, so their percentage meat must be declared. They would not be exempt from the percentage labelling requirements.
- **Food Packaged in the Presence of the Purchaser** such as food weighed and packed in front of the purchaser at the supermarket deli-counter, or food packed by the purchaser. *NOTE: These foods are also exempt from being FULLY Labelled (refer to Sections 3 and 4 in this Guide).*

- **Food Delivered Packaged and Ready for Immediate Consumption at the Express Order of the Purchaser.** eg, delivered take-away food such as pizza. *NOTE: These foods are also exempt from being FULLY Labelled.*
- **Food Sold at Fund-Raising Events.** Such as a school gala. *NOTE: These foods are also exempt from being FULLY Labelled.*

Percentage Labelling: Method of Calculation

To calculate the percentage of characterising ingredients or components, divide the ingoing weight of the characterising ingredient(s) or component by the total weight of all ingoing ingredients and multiply this value by 100. However, do not include in the weight of the ingoing ingredients any added water or volatiles lost during manufacture. Be careful to keep all the weight units the same (ie, don't mix g with kg for example).

ie,

$$\% \text{ Characterising 'Ingredient'} = \frac{\text{Characterising Ingredient Ingoing Weight (g)}}{\left(\text{Total Ingoing Weight of ALL Ingredients (g)} - \left(\text{Weight of Added Water (or Volatile Ingredients) lost during Manufacture (g)} \right) \right)} \times 100\%$$

$$\% \text{ Characterising 'Category of Ingredients'} = \frac{\text{Characterising 'Category of Ingredients' Ingoing Weight (g)}}{\left(\text{Total Ingoing Weight of ALL Ingredients (g)} - \left(\text{Weight of Added Water (or Volatile Ingredients) lost during Manufacture (g)} \right) \right)} \times 100\%$$

$$\% \text{ Characterising 'Component'} = \frac{\text{Characterising Component Weight in the Ingoing Ingredients (g)}}{\left(\text{Total Ingoing Weight of ALL Ingredients (g)} - \left(\text{Weight of Added Water (or Volatile Ingredients) lost during Manufacture (g)} \right) \right)} \times 100\%$$

eg, for the Tropical Sauce Product used as an example in Appendix 5, you would calculate the characterising percentage of the Coconut Cream ingredient as:

$$\% \text{ Characterising Ingredient (Coconut Cream)} = \frac{42\text{g}}{106.75\text{g} - 6.75\text{g}} \times 100\%$$

$$\Rightarrow \% \text{ Coconut Cream} = \frac{42\text{g}}{100\text{g}} \times 100\%$$

$$\% \text{ Coconut Cream} = 42\%$$

Similarly, to calculate the characterising percentage of the fruit juice category of ingredients (the Pineapple Juice AND the Mango Juice):

$$\% \text{ Characterising Category of Ingredients (Fruit Juice)} = \frac{(2\text{g} + 1.5\text{g})}{106.75\text{g} - 6.75\text{g}} \times 100\%$$

$$\% \text{ Characterising Category of Ingredients (Fruit Juice)} = \frac{3.5\text{g}}{100\text{g}} \times 100\%$$

$$\% \text{ Characterising Category of Ingredients (Fruit Juice)} = 3.5\%$$

Notice that in both of the previous examples, the 'Total Ingoing Weight of ALL Ingredients – Weight of Added Water (or Volatile Ingredients) lost during Manufacture' is the same as the final 'Cooked Weight' of the Product (100g in this case).

Special Cases

Where the Characterising Ingredient loses Moisture

If the ingredient itself loses moisture (during cooking or heating all of the added water is lost and then more is lost from the moisture-containing ingredients), you may divide the final weight of the characterising ingredient (after the water is lost from it) by the total final cooked weight X 100. Consult the 'Calculations based on final weight of ingredient in final weight of food' section in Attachment 1 of the FSA NZ Percentage Labelling User Guide¹⁸ for how to do this calculation.

Concentrated or Dehydrated Ingredients

If you are using a concentrated or dehydrated ingredient (or category of ingredients), which is reconstituted [*usually with water*] during manufacture, you may use either the **reconstituted** ingoing weight of the ingredient, or the dried/concentrated weight, in the calculation of the characterising percentage, but you must make this clear on the label. eg, for 12.51kg of an Apple Pie Filling Product, comprising 2kg dried apple, 10kg *added* water, plus 0.5kg of starch and 0.01kg spices, where 7kg of water is required to reconstitute the dried apple back to the same moisture content of fresh apple (ie, 2kg dried apple + 7kg water = 9kg reconstituted apple), you could declare the characterising apple ingredient as either:

Reconstituted Dried Apple (9kg ÷ 12.51kg X 100) = 71.92% or rounded to 72%.

OR

Dried Apple (2kg ÷ 12.51kg X 100) = 15.99% or rounded to 16%.

Concentrated or Dehydrated Food Products Requiring Reconstitution

For the characterising percentage in a food that requires reconstitution before consumption, you may use the percentage for the food either as reconstituted (rather than as sold), or as concentrated/dried product (as sold), but again you must clarify this on the label.

How Should the Characterising Proportions be Declared on the Label?

The characterising proportion must be labelled as either a percentage, or in the case where it is declared in the Nutrition Information Panel, an average quantity.

Characterising Ingredients MAY be rounded to nearest whole number, or where it is below 5%, to the nearest ½%, eg, 0.5%, 1.0%, 1.5%, 2.0%, 2.5%, and so on (but it is not compulsory). However, the rounding must only be done in whole number or ½ percent intervals (as appropriate), you cannot have 0.3% or 2.8% for example.

Characterising Components MUST be rounded to nearest whole number, or where it is below 5%, to the nearest ½%, eg, 0.5%, 1.0%, 1.5%, 2.0%, 2.5%, and so on (this *is* compulsory). However, the rounding must only be done in whole number or ½ percent intervals (as appropriate) ie, you cannot have 0.2% or 3.7% either for example.

NOTE: Use decimals rather than fractions, ie, 0.5% not ½%.

You can declare the characterising percentages anywhere on the label, provided it is a prominent position (to comply with the legibility requirements of Standard 1.2.9 in the FSC). It is usually a good idea to put the percentages either close to the Name of the Food on the label, or close to the Ingredient Listing on the label. For characterising ingredients, you could declare the percentages within the Ingredient Listing itself. However, if you choose this option, the percentages must appear immediately after the corresponding ingredient in the Ingredient Listing. For example, for the Tropical Sauce Product (see Appendix 5):

INGREDIENTS: Coconut Cream (42%), Water, Soy Sauce (water, hydrolysed vegetable protein, salt, stabiliser (412, 415), flavour enhancer (621), acid (330), preservative (211)), Mango Puree (8%), Fruit Juice (3.5%), Salt, Emulsifier (322).

Contains Soybean Products.

Notice that in the above example, Soybeans are emphasised using **bold lettering**. This is to comply with the mandatory declaration of allergens requirement of the FSC as well as the legibility requirements (to be prominent and legible). Consequently, the 'Soybean Products' (*Soy Sauce and the Lecithin Emulsifier (322)*) are not considered to be 'emphasised' by the bold type so their percentages are not required to be declared.

Alternatively, for the Tropical Sauce Product example you could include a separate statement on the label such as:

'Contains Coconut Cream 42%, Mango Puree 8% and Fruit Juice 3.5%'.

Another option, in cases where the characterising ingredient (or component) is mentioned in the name of the food, is to declare the percentage immediately after the name of the corresponding ingredient name in the Name of the Food itself. For example:

'Apple (23%) and Apricot (16%) Custard'.

Since characterising components are not normally specified in the ingredient listing (or name of the food either usually), you would declare them either in the Nutrition Information Panel, or in a separate statement on the label.

eg, for **'Ice-cream'**, you would include on the label a statement such as:

Contains 20% Milk-fat.

Similarly, for **'Chocolate'**, you would include on the label a statement such as:

Contains 35% Cocoa Solids.

When declaring the characterising proportion in the Nutrition Information Panel you must use the **average** quantity. However, you can declare either the **minimum** or **actual** (ie, average) proportion when declaring the percentage elsewhere on the label, provided you clarify which is used. For example, if minimum percentages were used in the Tropical Sauce Product, you could either insert the word 'minimum' after each percentage, eg:

INGREDIENTS: Coconut Cream (41% minimum), Water, Soy Sauce (water, hydrolysed vegetable protein, salt, stabiliser (412, 415), flavour enhancer (621), acid (330), preservative (211)), Mango Puree (7% minimum), Fruit Juice (3% minimum), Salt, Emulsifier (322). **Contains Soybean Products.**

OR, you could put an asterisk (*) after each percentage and include a footnote to the ingredient listing explaining that they are all minimums, eg:

INGREDIENTS: Coconut Cream (41%)*, Water, Soy Sauce (water, hydrolysed vegetable protein, salt, stabiliser (412, 415), flavour enhancer (621), acid (330), preservative (211)), Mango Puree (7%)*, Fruit Juice (3%)*, Salt, Emulsifier (322).

Contains Soybean Products.

*** All percentages are minimums.**

Notice that the minimum percentages will normally be lower than the average percentages, UNLESS the portion-control during addition of ingredients is [unusually] extremely precise, rather than slightly variable.

Please note that some products can contain both characterising Ingredients and characterising components. For example, for a 'Fruit and Nut Milk Chocolate' product, you would need to declare: the % Fruit, the % Nuts, the % Milk Solids, and the % Cocoa Solids¹⁸ – the former two being characterising **ingredients**, and the latter two being characterising **components**.

Remember to RECORD all of your Characterising Ingredients and/or Components, together with their corresponding percentages (or average quantities when declared in the Nutrition Information Panel) in the Section 15 Checklist.

Once you have completed this Section, return to XVI in Section 1: Main flow Diagram (or in the case of food products exempt from being fully labelled, return to Section 4) to continue.



Genetically Modified Food Declarations

– Standard 1.5.2

Version Control July 2007

Key to Section 13

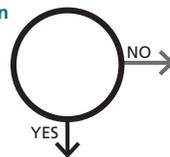
Where to start



Record



Question



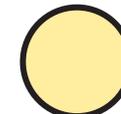
Signals the end of the flowchart (may also include an instruction)



Instruction

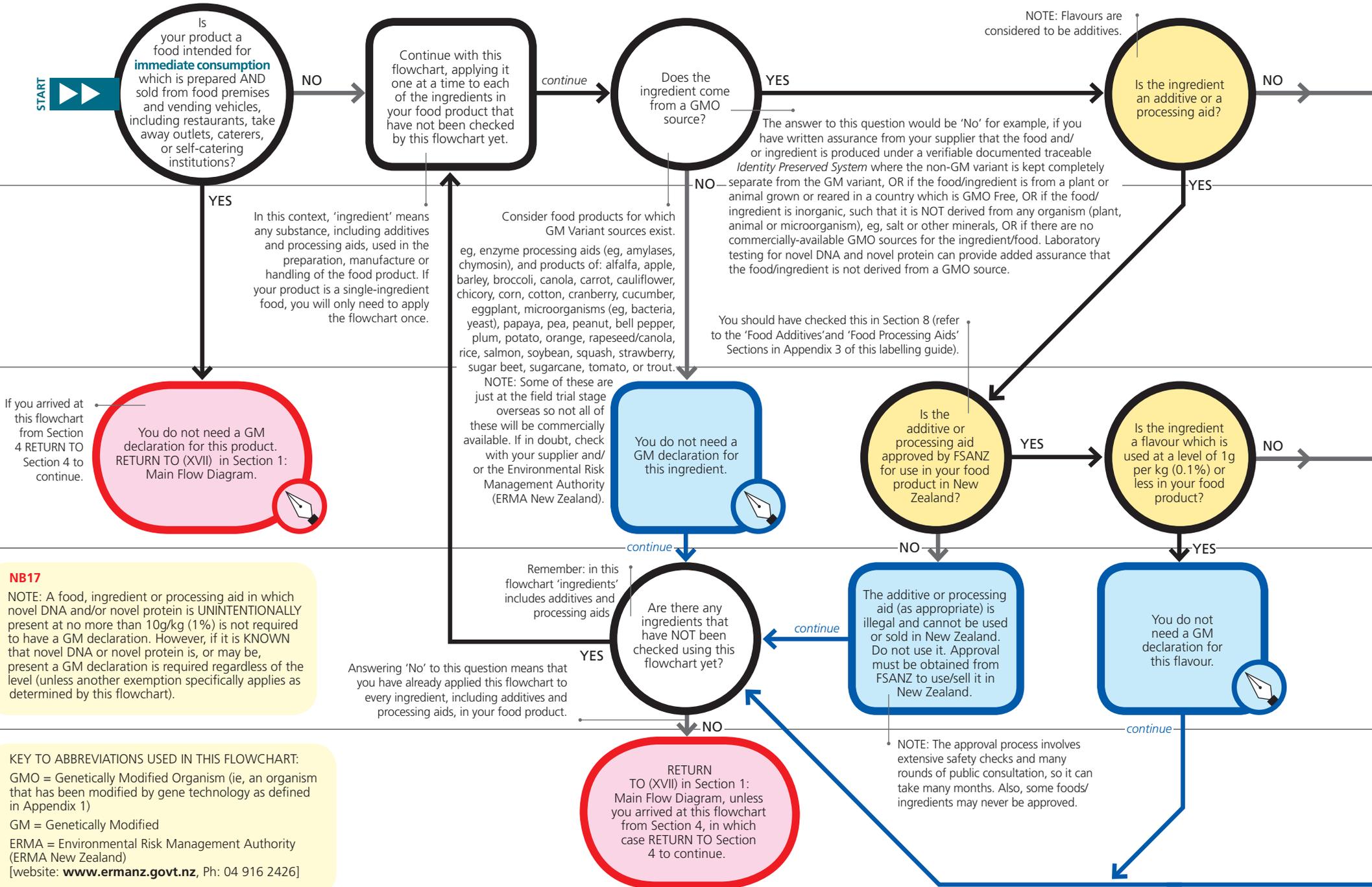


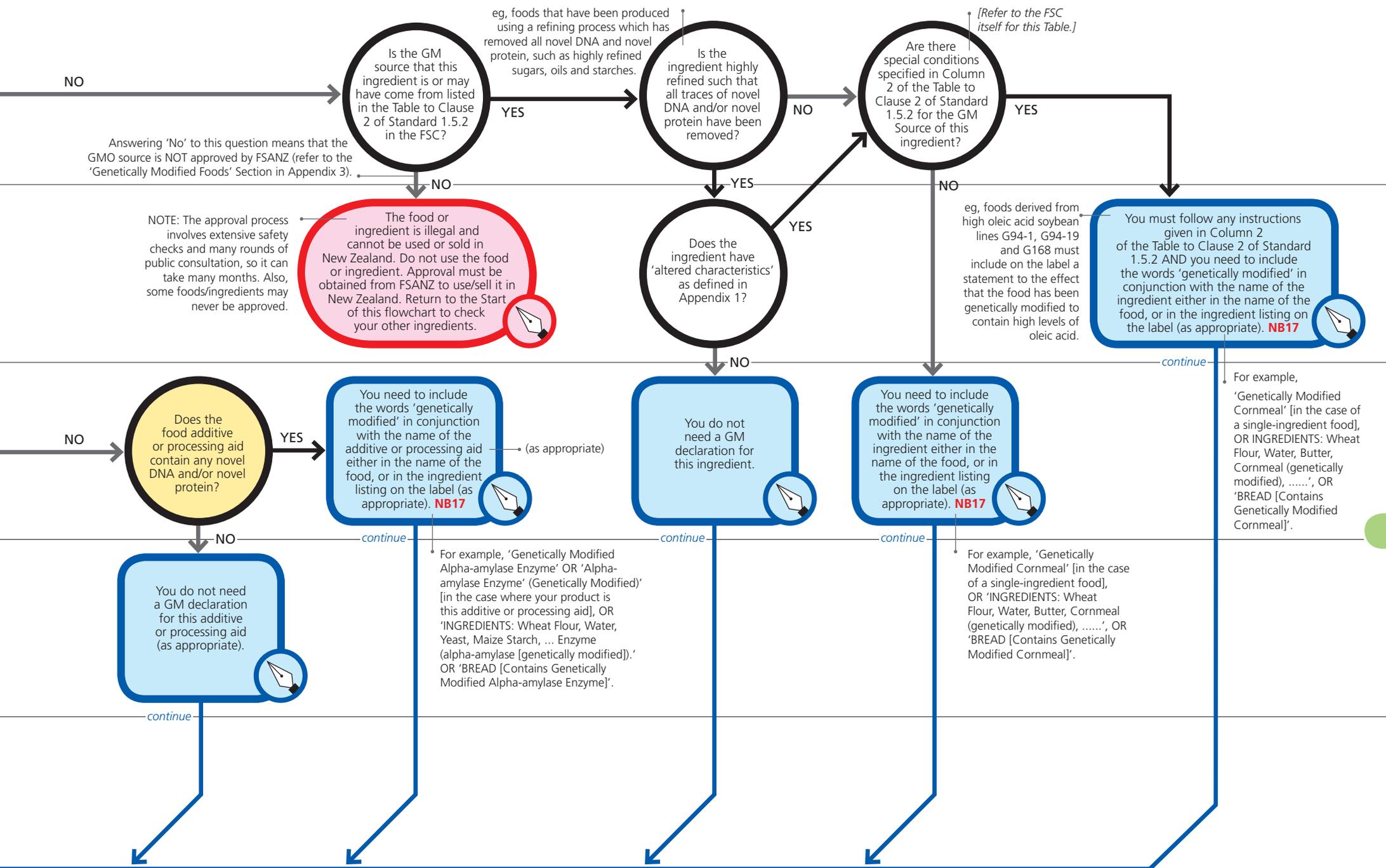
Questions relating to additives and processing aids



Reference to a Supplementary note elsewhere on the page eg, NB17

NBx





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Irradiated Food Declarations

– Standard 1.5.3

Version Control July 2007

Key to Section 14

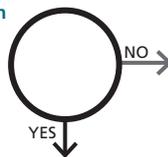
Where
to start



Record



Question



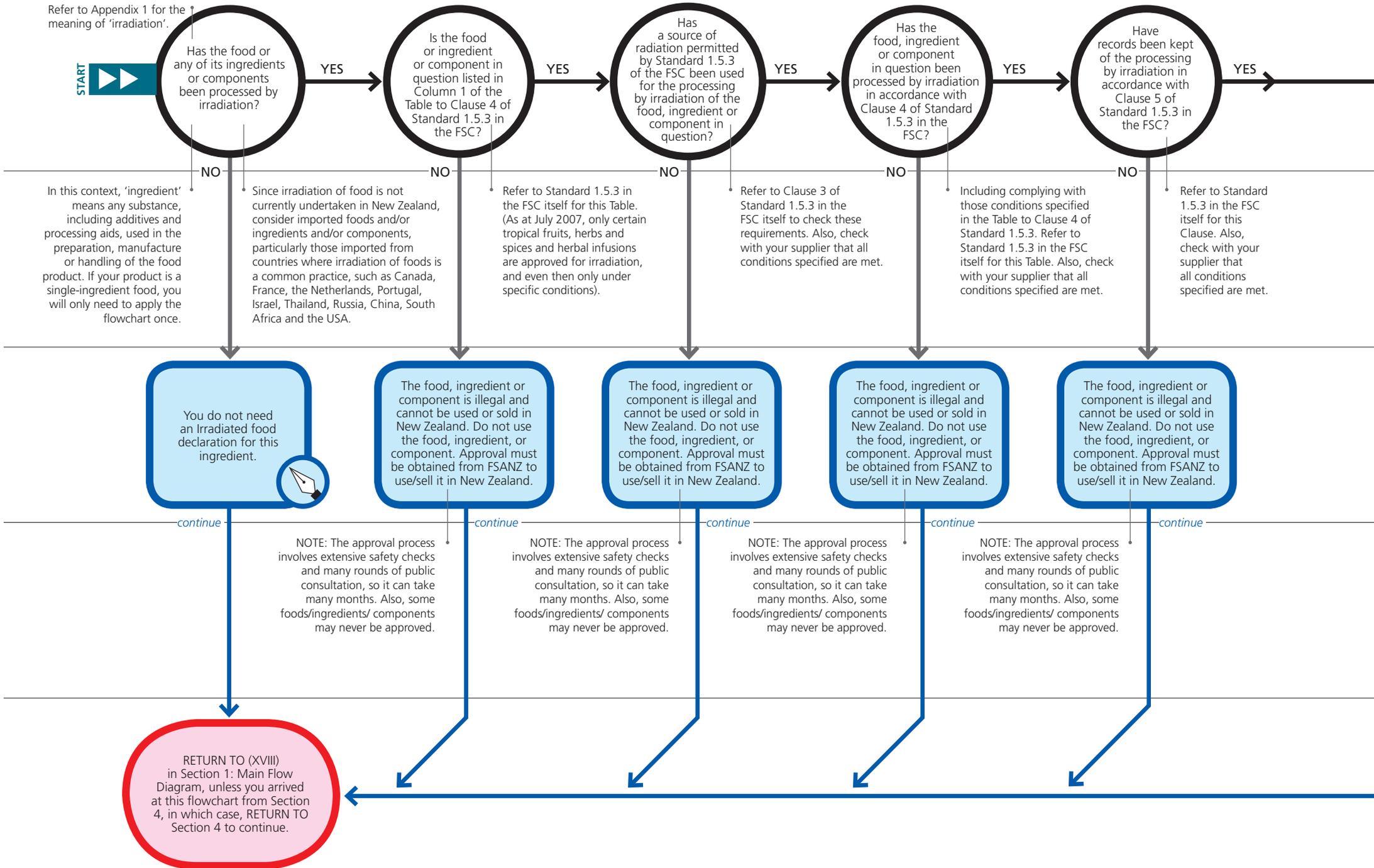
Signals the end
of the flowchart
(may also include
an instruction)

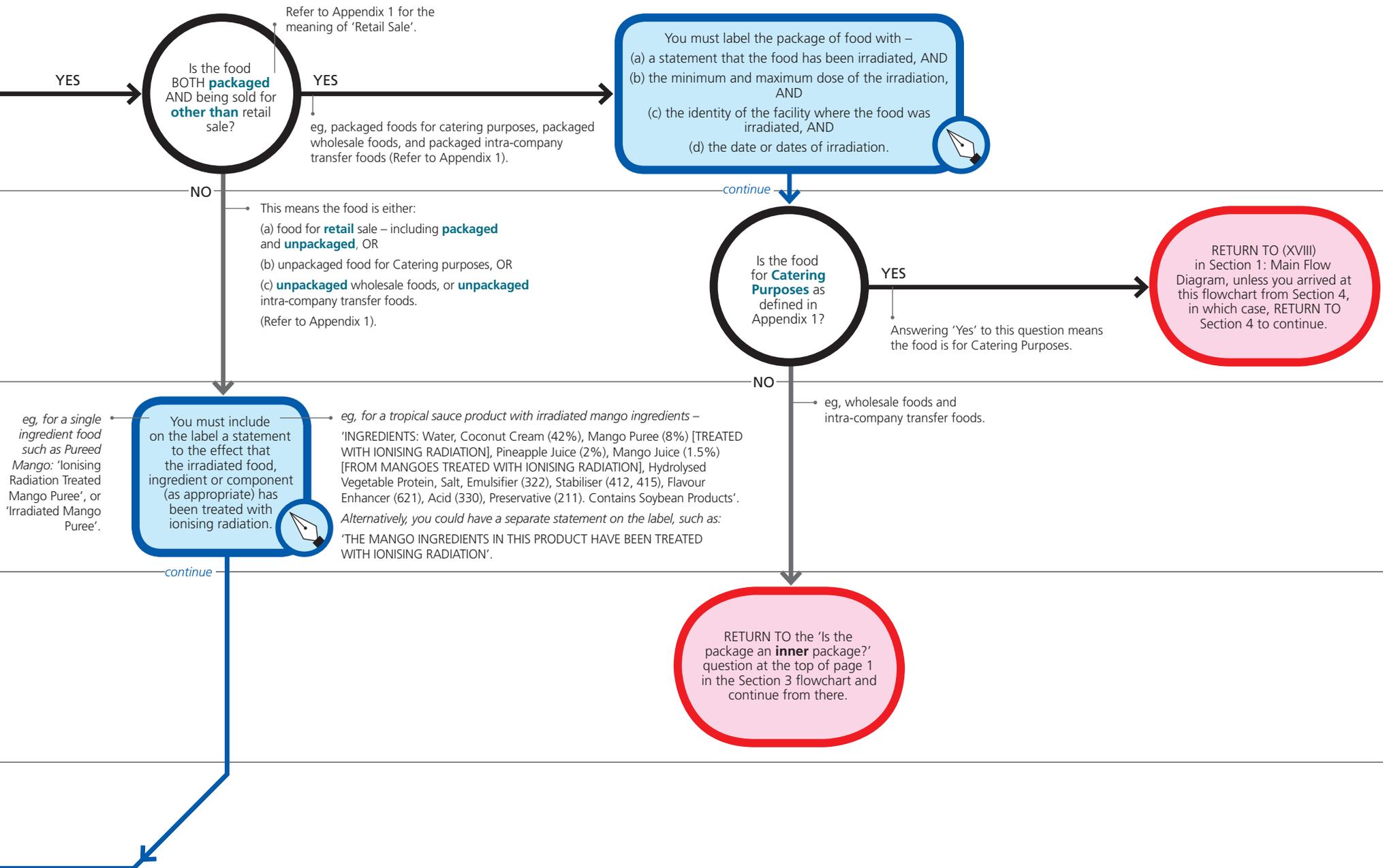


Instruction



Refer to Appendix 1 for the meaning of 'irradiation'.





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FOOD SAFETY CONCERNS

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Summary Checklist

A separate Checklist is to be completed for each product, market and layer of packaging. User adds text to shaded cells and can add extra rows as required.

Section 4: Product exempt from Full Labelling [CONTINUED]

Warning Statements required and type-size requirements
(eg, the warning statement for royal jelly)

Substances for Mandatory Declaration
(ie, food allergens/intolerance substances present, refer to Section 7 later in this checklist)

Advisory Statement required for high levels of polyols and/or polydextrose if applicable
(eg, lactitol, maltitol, maltitol syrup, polydextrose, isomalt)

Is a Nutrition Claim Made?
YES NO (circle one)

If YES, Nutrition Information is required (refer to Section 11 later in this checklist and complete the Nutrition Information Panel or the nutrition declarations required in the case of small packages)

Characterising Percentages (%)
[List the relevant ingredients and/or components with their %]

'Genetically Modified' declarations required

'Treated with Ionising Radiation' declarations required
(or Irradiation Information required in the case of packaged foods for other than retail sale)

Section 5: Product-Specific Labelling Requirements

Does this product, or any of its ingredients, have any Product-Specific Labelling requirements? (Is food of this type, or any of its ingredients, listed in the Table in Section 5 of this Guide?)

YES NO (circle one)

If YES, what are they?

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Section 6: Food Identification and Legibility [NOTE: This is mandatory in almost all cases]

Will all labelling and information requirements (*in all sections*) meet the legibility criteria?

YES NO (circle one)

If NO, what changes are required?

Does this product have a Prescribed Name?

YES NO (circle one)

If YES, what is the Prescribed Name?

If NO, what Name will be used?

Does this product need Lot Identification? (NZFSA suggests this in any case)

YES NO (circle one)

If YES, what Lot ID will be used?

If NO, why not?

Does this product need the Supplier's Business Name and Address on the Label? (NZFSA suggests this in any case)

YES NO (circle one)

If YES, what Name and Address will be used?

If NO, why not?

Section 7: Warning and Advisory Statements and Mandatory Declarations of Certain Substances

WARNING STATEMENTS

Is this food Royal Jelly, or does it contain Royal Jelly as an ingredient?

YES NO (circle one)

If YES, include the Warning Statement required.

The warning statement must use the exact words given in the Section 7 flowchart and the type size must be at least 3mm, or in the case of small packages 1.5mm.

ADVISORY STATEMENTS: Indicate whether each ingredient contains any of the Substances below [refer to the Table to Clause 2 of Standard 1.2.3 in the FSC also].

List the Ingredients used in this product (including additives and processing aids).

	Cereal-based beverages, containing, $\leq 2.5\%$ m/m fat and $\leq 3\%$ m/m protein, or $\leq 3\%$ m/m protein only	Food is, or contains Bee Pollen/Propolis (Specify which)	Evaporated milks, dried milks and equivalent products made from soy or cereals with $\leq 2.5\%$ m/m fat when reconstituted for consumption	Food containing Aspartame or aipartame-accesulphame salt (Specify which)	Evaporated and dried cereal products containing $\leq 2.5\%$ m/m fat and $\leq 3\%$ m/m protein, or $\leq 3\%$ m/m protein only, when reconstituted for consumption	Food containing Guarana or extracts of guarana	Food containing added phytosterol esters	Food containing added tall oil phyosterols	Food is, or contains Kola beverage containing added caffeine	Milk, and beverages made from soy or cereals, where these foods contain no more than 2.5% m/m fat	Unpasteurised egg products	Unpasteurised milk and unpasteurised liquid milk products	Food containing Quinine
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO

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Section 7: Warning and Advisory Statements and Mandatory Declarations of Certain Substances [CONTINUED]

POLYOLS/POLYDEXTRROSE ADVISORY STATEMENT

Indicate the levels of any of the substances below that are present in the product.

	(A)					(B)			
	Lactitol	Maltitol	Maltitol syrup	Mannitol	Xylitol	Erythritol	Isomalt	Polydextrose	Sorbitol
PRESENT:	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO	YES / NO
LEVEL (g/100g):									
Total combined of (A)						g/100g			
TOTAL combined of (B)						g/100g			
TOTAL COMBINED of (A) + (B):						g/100g			
THRESHOLD LEVEL IN PRODUCT EXCEEDED?:	Is Total (A) present either singularly or in combination at more than 10g/100g (10%)? YES NO (circle one)					Is Total (B) present either singularly or in combination at more than 25g/100g (25%)? YES NO (circle one)			
THRESHOLD LEVEL IN PRODUCT EXCEEDED?:	Is Total (A) and (B) present either singularly or in combination at more than 10g/100g (10%)? YES NO (circle one)								

If any of the Polyols, Maltitol Syrup, Isomalt or Polydextrose above are present at more than the threshold limits shown, include below the Advisory Statement to the effect that excess consumption of the food may have a laxative effect:

A separate Checklist is to be completed for each product, market and layer of packaging. User adds text to shaded cells and can add extra rows as required.

Section 11: Nutrition Information Panel (NIP)

PART 1:

Does the product need a NIP or Nutrition Information? YES NO (circle one)

If NO, why not? (and go to Section 12 in this checklist)

Has this product been Lab Tested to provide Nutrition Information? YES NO (circle one)

Is the Nutrition Information for this product Calculated? YES NO (circle one) If YES, describe the source of the Nutrition Information used for each Ingredient below.

List the Ingredients used in this product:

Source of Nutrition Information:

What Calculator or Laboratory was used to determine the Nutrition Information?

--

Describe any Nutrition Claims made about this product:

Describe the Conditions or Composition Requirements associated with this claim (refer to Appendix 7):

PART 2:

Describe the Nutrition Information Required and how this must be presented (eg, declarations for the label of small packages, nutrients to be included in the Nutrition Information Panel on labels for other foods, Special requirements for Special Purpose Foods such as Infant Formula Products).

ALTERNATIVELY, compile the NIP that satisfies all the Nutrition Information Requirements (see next page).

A separate Checklist is to be completed for each product, market and layer of packaging. User adds text to shaded cells and can add extra rows as required.

Section 11: Nutrition Information Panel (NIP) [CONTINUED]

Fill in this table showing the NIP values for this product (or change to a different format if making Nutrition Claims, the NIP is for a liquid food, or where special additional requirements apply, eg, Infant Formula Products).

NUTRITION INFORMATION				
Servings per package:				
Serving size:				
	Ave Quantity per Serving		Ave Quantity per 100g	
Energy		kJ		kJ
Protein		g		g
Fat, total		g		g
- saturated		g		g
Carbohydrate		g		g
- sugars		g		g
Sodium		mg		mg

Section 12: Percentage (%) Labelling – Characterising Ingredients/Components

Do any Ingredients or Components in this product need to be percentage Labelled?

YES NO (circle one) If YES, which Ingredients/Components [specify below] and why?
If NO, why not?

	present at		%
	present at		%
	present at		%

What percentage should be used for the Characterising Ingredients/Components?
Ingredient or Component 1 [Name it]
Ingredient or Component 2 [Name it]
Ingredient or Component 3 [Name it]

Section 13: Genetically Modified Food Declarations

Do any Ingredients in this product require a GM Declaration?

YES NO (circle one) If YES, which Ingredients and why?
Show GM Declarations required.
If NO, why not?

Do any additional GM Labelling or information requirements apply? (eg, GM foods with altered characteristics such as soybeans genetically modified to contain high levels of oleic acid)

YES NO (circle one) If YES, what are they? [Describe]
Show additional GM Labelling/information required.

Section 14: Irradiated Food Declarations

Are any 'Treated with Ionising Radiation' declarations required?

YES NO (circle one) If YES, which Ingredients and why?
Show 'Treated with Ionising Radiation' statement required.
If NO, why not?

A separate Checklist is to be completed for each product, market and layer of packaging. User adds text to shaded cells and can add extra rows as required.

SUMMARY OF LABELLING AND INFORMATION REQUIREMENTS FOR THIS PRODUCT

INFORMATION TO APPEAR ON LABEL

COMMENTS

Product Identification Requirements (Section 6)

Name of Food

[Include underneath any characterising percentage (Section 12) and GM/Irradiated Food Declarations (Sections 13/14) required]

Lot ID Format

Supplier Business Name and Address

Quantity Marking (Section 2)

Date Marking Type and Format (Section 9)

Storage Instructions (Section 10)

Directions for Use (Section 10)

[Including cooking instructions if applicable]

Product-Specific Requirements (Section 5)

Warning Statements and Advisory Statements (Section 7)

Statement of Ingredients (Section 8)

[Show final Ingredient Listing and include characterising percentage, substances requiring mandatory declaration (eg, allergens), and GM and Irradiated Food Declarations if applicable EITHER within the Ingredient Listing, OR beneath it (as appropriate)]

Nutrition Information Panel (NIP)

INGREDIENTS:

NUTRITION INFORMATION		
Servings per package:		
Serving size: g		
	Ave Quantity per serving	Ave Quantity per 100g
Energy	kJ	kJ
Protein	g	g
Fat, total	g	g
- saturated	g	g
Carbohydrates	g	g
- sugars	g	g
Sodium	mg	mg

Are all legibility requirements met? (Section 6)

Legible?

Prominent?

In English?



Appendices

WORDS OR TERMS USED THROUGHOUT THIS LABELLING GUIDE, IN RELATION TO THE AUSTRALIA NEW ZEALAND FOOD STANDARDS CODE:

Act:

means the Act, as amended or, as the case may be, Ordinance of a State, Territory, External Territory, Commonwealth or New Zealand, under the authority of which the FSC is enforced [for New Zealand this is the Food Act 1981].

Additive:

[Refer to the definition given for Standard 1.3.1 below.]

ANZS:

means a joint Australia New Zealand Standard published by Standards Australia.

AOAC:

means the publication entitled **Official Methods of Analysis of AOAC International** published by AOAC International, Maryland, USA, and includes earlier editions of this publication under its previous name.

AS:

means an Australian Standard published by Standards Australia.

Australian Approved Name:

means a name included in the **Herbal Substances AAN List of the Australian Approved Names List**.

Australian Approved Names List:

means the list of names or terms included in the document entitled **Australian Approved Names for Pharmaceutical Substances** published by the Therapeutic Goods Administration in its edition **TGA Approved Terminology for Medicines** dated 6 March 2001.

Average Quantity:

in relation to a substance in a food is the quantity determined from one or more of the following –

- (a) the manufacturer's analysis of the food, or
- (b) calculation from the actual or average quantity of nutrients in the ingredients used, or
- (c) calculation from generally accepted data,

which best represents the quantity of the substance that the food contains, allowing for seasonal variability and other known factors that could cause actual values to vary.

Editorial note: The substances referred to in the definition of 'average quantity' are, for example, sodium, potassium, fatty acids, amino acids and vitamins and minerals.

Bulk Cargo Container:

means an article of transport equipment, being a lift van, movable tank, or other similar structure –

- (a) of a permanent character and accordingly strong enough to be suitable for repeated use, and
 - (b) specifically designed to facilitate the carriage of goods by one or more modes of transport, without immediate repacking, and
 - (c) fitted with devices permitting its ready handling and its transfer from one mode of transport to another, and
 - (d) so designed as to be easy to fill and empty, and
 - (e) having an internal volume of one cubic metre or more, [NOTE: An internal volume of 1 cubic metre is equivalent to an internal volume of 1,000 Litres] and
 - (f) includes the normal accessories and equipment of the container, when imported with the container and used exclusively with it, and
 - (g) shipping container or aircraft cargo container, but does not include –
 - (h) any vehicle, or any ordinary packing case, crate, box, or other similar article used for packing.
-

Business Address:

means a description of the location of the premises from which the business in question is being operated, but cannot be a Post Office Box or other type of postal address (eg, *Rural Delivery Number*).

[It does not have to be the processing site address, eg, it could be the head office. It must be a physical location in NEW ZEALAND (or Australia if appropriate). It must be a physical street address comprising the street or road number, street or road name, suburb and city]²¹.

Category of Ingredients:

means ingredients declared in the statement of ingredients using a generic name set out in the Table to Clause 4 of Standard 1.2.4 in the FSC. eg, *cereals, fats or oils, fish, fruit, herbs, meat, spices, vegetables*.

Chocolate:

means the confectionery product characterised by the presence of cocoa bean derivatives –

- (a) prepared from a minimum of 200g/kg of cocoa bean derivatives, and
 - (b) which contains no more than 50g/kg of edible oils, other than cocoa butter or dairy fats.
-

Claim:

means any statement, representation, information, design, words or reference in relation to a food which is not mandatory in the FSC.

Editorial note: A claim may be made for example, on the label on a package of food or in an advertisement. [eg, Billboard, TV, Radio, Newspaper Advertisements or Internet Website information (particularly when the website address is included on the label).]

[Refer also to the definitions for Health Claim (see below) and Nutrition Claim (see the definitions under the Standard 1.2.8 Section below).]

Cocoa:

means the powdered product prepared from cocoa beans from which a portion of the fat may have been removed, with or without the addition of salt and/or spices.

Code:

means the **Australia New Zealand Food Standards Code [FSC]** used by the Minister under the Food Act.

Code Number:

used in relation to a food additive, means either –

(a) the number set out in the Schedules to Standard 1.3.1 in the FSC in relation to that food additive, or

(b) the number referred to in (a) preceded by the letter 'E'.

eg, 100 = the colour, curcumins (also known as turmeric in Schedule 2 to Standard 1.2.4 in the FSC),

300 = the antioxidant or acidity regulator, ascorbic acid,

621 = the flavour enhancer, Monosodium glutamate, L- (also known as MSG in Schedule 2 to Standard 1.2.4 in the FSC).

Coffee:

means the product prepared by roasting and/or grinding of coffee beans.

Commonwealth:

means the Commonwealth of Australia.

Component:

means any substance including a food additive used in the preparation of an ingredient and present in the final product in a primary or modified form.

eg, sulphur dioxide is used in the treatment of animal hides to be used for gelatine manufacture.

Since the gelatine will contain some residual sulphur dioxide as a result of this processing, the residual sulphur dioxide is a component of the gelatine. [Refer also to the definition given under the Standard 1.2.4 Section below.]

Decaffeinated Coffee:

means coffee from which most of the caffeine has been removed and which contains no more than 1g/kg of anhydrous caffeine on a dry basis.

Decaffeinated Soluble Coffee or Instant Coffee and Decaffeinated Soluble or Instant Tea:

means soluble or instant coffee or soluble or instant tea from which most of the caffeine has been removed and which contains no more than 3g/kg of anhydrous caffeine on a dry basis.

Decaffeinated Tea:

means tea from which most of the caffeine has been removed and which contains no more than 4g/kg of anhydrous caffeine on a dry basis.

ESADDI:

means, for a vitamin or mineral in Column 1 of the Schedule to Standard 1.1.1 of the FSC, the Estimated Safe and Adequate Daily Dietary Intake, specified for that vitamin or mineral –

(a) in Column 3, and

(b) in Column 4 for children aged one to three years,

calculated and expressed in the form specified in Column 2.

[Refer also to the definition in Standard 2.9.2 (see below).]

Flavour or Flavouring:

means intense preparations which are added to foods to impart taste and/or odour, which are used in small amounts and are not intended to be consumed alone, but do not include herbs, spices and substances which have an exclusively sweet, sour or salt taste (excluding herbs and spices and intense sweeteners).

Freshness Layer:

means the layer of packaging used to keep the product fresh. This layer is always inside another layer of packaging. The outer layer of packaging is the one the consumer sees. An example is the bag containing cereal inside the cardboard box.

FSANZ: [\[Abbreviation for the purposes of this Labelling Guide\]](#)

is an abbreviation for Food Standards Australia New Zealand.

FSC: *[Abbreviation for the purposes of this Labelling Guide]*

is an abbreviation for the Australia New Zealand Food Standards Code up to and including Amendment No. 107 as at May 2009 (time of writing this labelling guide. You will need to check any Amendments subsequent to No. 107 for labelling requirements).

Fund Raising Events:

Fund raising event organisers should be aware that there may be New Zealand legislative requirements that need to be complied with in order to conduct the event.

Gelatine:

means a protein product prepared from animal skin, bone or other collagenous material, or any combination thereof.

Handling of Food

includes the making, manufacturing, producing, collecting, extracting, processing, storing, transporting, delivering, preparing, treating, preserving, packing, cooking, thawing, serving or displaying of food.

Health Claim: *[Term developed for the purposes of this Labelling Guide based on the FSC Transitional Standard 1.1A.2]*

Means:

- (a) a claim where the word 'health' or any words of similar import are used in conjunction with the name of the food, and/or
- (b) any word, statement, claim, express or implied, or design that directly or by implication could be interpreted as advice of a medical nature from any person, and/or
- (c) a claim which references any disease or physiological condition.

NOTES: (1) Health Claims are currently under review by FSANZ. In the meantime, the transitional provisions mean that Health claims are generally prohibited unless they are specifically permitted by the FSC.

(2) Health Claims are distinctly different from Nutrition Claims. Refer also to the definitions for Claim (see above), and Nutrition Claim (see under the Standard 1.2.8 section below). [Refer to the Transitional Standard 1.1A.2 in the FSC.]

Instant Coffee or Soluble Coffee:

means the dried soluble solids prepared or extracted from the water extraction of coffee.

Instant Tea or Soluble Tea:

means dried soluble solids obtained from the water extraction of tea.

Label:

means any tag, brand, mark or statement in writing or any representation or design or descriptive matter on or attached to or used in connection with or accompanying any food or package.

Lot:

means a quantity of food which is prepared or packed under essentially the same conditions usually –

(a) from a particular preparation or packing unit, and

(b) during a particular time ordinarily not exceeding 24 hours.

[eg, a batch of canned fruit puree removed from a retort (pressure cooker for heat treating the puree in its cans).]

Lot Identification: *(Also referred to as Lot ID in this Labelling Guide)*

means information which indicates, in a clearly identifiable form, the –

(a) premises where the food was packed or prepared, and

(b) lot of the food in question (*where lot means a quantity of food which is prepared or packed under essentially the same conditions usually – (a) from a particular preparation or packing unit, and (b) during a particular time ordinarily not exceeding 24 hours.*)

[For example, the Date Marking such as the Best Before date and the Supplier's Name and Business Address can serve as the Lot Identification when a full day's production represents one batch and there is only one manufacturing premise (located at the business address).]

Nutrition Information Panel or Panel:

means a panel which complies with the requirements of Division 2 of Standard 1.2.8 of the FSC. *[Refer to Section 11 of this Labelling Guide to determine these requirements for your product.]*

Nutritive Substance:

means a substance not normally consumed as a food in itself and not normally used as an ingredient of food, but which, after extraction and/or refinement, or synthesis, is intentionally added to a food to achieve a nutritional purpose, and includes vitamins, minerals, amino acids, electrolytes and nucleotides.

NZS:

means a New Zealand Standard published by Standards New Zealand.

Package:

means any container or wrapper in or by which food intended for sale is wholly or partly encased, covered, enclosed, contained or packaged and, in the case of food carried or sold or intended to be carried and sold in more than one package, includes every such package, but does not include –

- (a) bulk cargo containers, or
- (b) pallet overwraps, or
- (c) crates and packages which do not obscure the labels on the food, or
- (d) transportation vehicles; or
- (e) a vending machine; or
- (f) a hamper; or
- (g) food served on a covered plate, cup, tray or other food container in prisons, hospitals or other similar institutions listed in the Table to clause 8 of Standard 1.2.1.

The package is normally the container or wrapper that is taken away by the purchaser of the food.

*NOTE: In the context of the FSC a package is different from a transportation outer – refer also to the definition for Transportation Outer under the **Words or Terms Specific to Standard 1.2.1** section below.*

Peanut Butter:

means a peanut based spread containing no less than 850g/kg [85%] of peanuts.

Permitted Form:

means a form of a vitamin or mineral specified in Column 2 of the Schedule to Standard 1.1.1 of the FSC.

Portion Pack

means a portion of food in a smaller package. There will always be more than one portion pack in each retail pack. An example is a small bag of chippies packed in a larger bag containing many of the smaller bags.” Note: a Portion Pack can also be a Freshness Layer.

Prescribed Name:

means a name by which a food is defined or described in a standard of the FSC, and is declared in the FSC to be a prescribed name. *[Refer to Column 2 in the Table in Section 5 of this Labelling Guide to see which foods have prescribed names, eg, **honey** is a prescribed name.]*

Processing Aid:

[Refer to the definition given for Standard 1.3.3 below.]

RDI:

means, for a vitamin or mineral in Column 1 of the Schedule to Standard 1.1.1 in the FSC, the Recommended Dietary Intake, specified for that vitamin or mineral –

- (a) in Column 3, and
- (b) in Column 4 for children aged one to three years, calculated and expressed in the form specified in Column 2. *[Refer also to the definition in Standard 2.9.2 (see below).]*

Relevant Authority:

means the authority responsible for the enforcement of the FSC. *[New Zealand Food Safety Authority (NZFSA) in the case of New Zealand.]*

Retail Layer

means the layer of packaging that the consumer sees when purchasing or transferring the product. For example it's the layer that contains marketing information, it's not the layer used to transport the product to the retailer – this is the Transportation Outer.

Size of Type:

in relation to legibility requirements, means the measurement from the base to the top of a letter or numeral.

State:

means a State of the Commonwealth of Australia.

Statement of Ingredients:

means a statement as required in Standard 1.2.4 in the FSC. It is also referred to as an Ingredient Listing in this Labelling Guide (refer also to the definition in the Standard 1.2.4 section below).

Supplier:

means the packer, manufacturer, vendor or importer of the food in question.

Sweet Cassava:

means those varieties of cassava roots grown from ***Manihot esculenta Crantz*** of the ***Euphorbiaceae*** family that contain less than 50mg per kg of hydrogen cyanide (fresh weight basis).

*Editorial note: Sweet cassava may also be known by other common names including **manioc**, **mandioca**, **tapioca**, **aipim** and **yucca**.*

Tea:

means the product made from the leaves and leaf buds of one or more of varieties and cultivars of *Camelia sinensis* (L.) O. Kuntz.

Territory:

means a Territory of the Commonwealth of Australia.

Vitamin or Mineral:

[Refer to the definition given for Nutritive Substances above, eg, Vitamin A, Thiamin, Riboflavin, Niacin, Folate, Vitamin B6, Vitamin B12, Vitamin C, Vitamin D, and Vitamin E are all Vitamins. Calcium, Iodine, Iron, Magnesium, Phosphorus, and Zinc are all minerals.]

Warning Statement:

means a statement required to be expressed in the text as so prescribed in the FSC, in –

- (a) Clause 3 of Standard 1.2.3, and [Refer to the Section 7 flowchart]
- (b) Clause 3 of Standard 2.6.3, and [Refer to the Section 5 table in this Labelling Guide]
- (c) Subclauses 14(1), 14(3) and 26(1) of Standard 2.9.1, and [Refer to the Section 5 table in this Labelling Guide]
- (d) Paragraph 5(3)(c) and Subclause 6(2) of Standard 2.9.2, and [Refer to the Section 5 table in this Labelling Guide]
- (e) Subclauses 3(3) and 3(4) of Standard 2.9.4. [Refer to the Section 5 table in this Labelling Guide]

WORDS OR TERMS SPECIFIC TO STANDARD 1.2.1 IN THE FSC AND/OR SECTIONS 3,4,5,6,7,8,9,10,11 AND 12 OF THIS LABELLING GUIDE:**Assisted Service Display Cabinet:**

means an enclosed or semi-enclosed display cabinet which requires a person to serve the food as requested by the purchaser.

Foods for Catering Purposes:

includes food supplied to catering establishments, restaurants, canteens, schools, hospitals, and institutions where food is prepared or offered for immediate consumption.

Hamper

means a decorative basket, box or receptacle containing any number of separately identifiable food items.

Intra Company Transfer:

means a transfer of food between elements of a single company, between subsidiaries of a parent company or between subsidiaries of a parent company and the parent company. [eg, transferring a tonne of flour from a Food Company's Flourmill to a Bread Bakery owned by the same Food Company.]

Food for Retail Sale:

means food for sale to the public and includes food prior to retail sale which is –

- (a) manufactured or otherwise prepared, or distributed, transported or stored; and
- (b) not intended for further processing, packaging or labelling.

Small package:

means a package with a surface area of less than 100cm². [Refer to Appendix 2 of this Labelling Guide.]

Transportation Outer:

means a container or wrapper which encases packaged or unpackaged foods for the purpose of transportation and distribution and which is removed before the food is used or offered for retail sale or which is not taken away by the purchaser of the food. [eg, **the outer cardboard carton** containing a dozen large cans of baked beans delivered to a supermarket. The outer cardboard carton is generally discarded and only the cans themselves are displayed for sale on the supermarket shelf, or where the cans are displayed for sale in the carton, the purchaser does not normally take the carton away.]

NOTE: In the context of the FSC a **transportation outer** is different from a **package** – refer also to the definition for Package under the **Words or Terms Used Throughout this Labelling Guide** section above.

WORDS OR TERMS SPECIFIC TO STANDARD 1.2.2 IN THE FSC AND/OR SECTIONS 5, 6 AND 8 OF THIS LABELLING GUIDE:**Bulk Container:** [Term developed for the purposes of this Labelling Guide]

means any crate, box, carton, bin, vessel or other thing in which more than one item of a packaged or unpackaged food is placed to be displayed for sale, but which is not taken away by the customer, eg, plastic bulk bins of nuts, grains or dried fruit, in a retail supermarket.

Name of the Food: [Term developed for the purposes of this Labelling Guide]

means either –

- (a) the prescribed name of the food, where the name of a food is declared in the FSC to be a prescribed name, or

(b) in any other case, a name or a description of the food sufficient to indicate the true nature of the food.

[NOTE: The definitions of certain foods as set out in Chapter 2 of the FSC are not necessarily the name of the food.]

WORDS OR TERMS SPECIFIC TO STANDARD 1.2.4 IN THE FSC AND/OR SECTIONS 5, 7, 8 AND 12 AND APPENDICES 3, 4 AND 5 OF THIS LABELLING GUIDE:

Component: [Definition developed for the purposes of this Labelling Guide – based on the Editorial Note after Clause 1 of Standard 1.2.10 in the FSC]

in the context of percentage labelling, means a naturally present constituent of the food (or food ingredient), which is not added to the food (like ingredients are). eg, the caffeine in coffee, pollen residue in honey (these are not characterising components), the milk fat in ice-cream, and the cocoa solids in chocolate (these are characterising components), are all examples of components.

*[Refer also to the definition given under the section above for **Words and Terms used Throughout this Labelling Guide.**]*

Compound Ingredient:

means an ingredient of a food which is itself made from two or more ingredients.

Ingredient:

means any substance, including a food additive, used in the preparation, manufacture or handling of a food.

Sub-Ingredients: [Term developed for the purposes of this Labelling Guide]

means those individual ingredients (including additives) that collectively make up a compound ingredient, eg, the sub-ingredients of chocolate are usually sugar, cocoa mass, cocoa butter, whole milk powder, emulsifier (soybean lecithin) and flavour.

Recipe List: [Term developed for the purposes of this Labelling Guide]

means the list of all the ingredients (including additives and processing aids) used in a particular food product which is arranged in descending order of in-going weight.

Draft Ingredient Listing or Ingredient Listing Draft: [Term developed for the purposes of this Labelling Guide]

means the **work in progress** list that develops as you compile the **Statement of Ingredients** for a particular product, using the procedures outlined in Section 8 of this Labelling Guide.

Final Draft Ingredient Listing or Final Ingredient Listing Draft:

[Term developed for the purposes of this Labelling Guide]

means the Draft Ingredient Listing that you finish up with after completing all the procedures outlined in Section 8: Parts 0, 1, and 2 instructions and flowcharts in this Labelling Guide. It will be very similar to the **Statement of Ingredients** that needs to appear on the label of most packaged foods (except where specific exemptions apply as determined in the Section 8, Part 1 flowchart), but the ingredients will not necessarily be declared in a format that complies with the FSC requirements.

Generic Name:

The names listed in the Table to Clause 4 of Standard 1.2.4 in the FSC that may be used to describe certain ingredients in the Ingredient Listing (some conditions apply), eg, cereals, cheese, cocoa butter, crystallised fruit, fats or oils, fish, fruit, gum base.

Ingredient Listing or Statement of Ingredients: [Term developed for the purposes of this Labelling Guide]

means the completed list of ingredients in the correct format as it should appear on the label of a particular food product of yours. It will be the result of you completing all the procedures outlined in Section 8: Parts 0, 1, 2, AND 3 of this Labelling Guide (instructions and flowcharts).

Novel Food:

[Refer to the definition given for Standard 1.5.1 below.]

Technological Function:

[Refer to the definition given for Standard 1.3.1 below.]

T: [Abbreviation for the purposes of this Labelling Guide]

= Total weight (ie, the batch weight) of ingoing ingredients (kg) – [added water (kg) + added volatile ingredients (kg)].

U: [Abbreviation for the purposes of this Labelling Guide]

= Final weight of the heated or cooked food product (kg).

V: [Abbreviation for the purposes of this Labelling Guide]

= U – T

= the amount of added water and/or added volatile ingredients remaining in the cooked or heated food product.

NOTE: If V is zero or less (ie, a negative value) it means ALL the added water and volatile ingredients have been completely removed by evaporation. However, if V is more than zero (ie, a positive value), then some of the added water and/or volatile ingredients remain in the final cooked/heated food product.

W %: [Abbreviation for the purposes of this Labelling Guide]

= V ÷ U x 100

= the percentage (%) of added water and/or volatile ingredients remaining in the final heated or cooked product.

WORDS OR TERMS SPECIFIC TO STANDARDS 1.2.5 AND 1.2.6 IN THE FSC AND/OR SECTIONS 9 AND 10 OF THIS LABELLING GUIDE:

Baked-For Date:

in relation to bread, means a date not later than 12 hours after the time the bread was baked.

Baked-On Date:

in relation to bread, means the date on which the bread was baked.

Best-Before Date:

in relation to a package of food, means the date which signifies the end of the period during which the intact package of food, if stored in accordance with any stated storage conditions, will remain fully marketable and will retain any specific qualities for which express or implied claims have been made.

Use-By Date:

in relation to a package of food, means the date which signifies the end of the estimated period if stored in accordance with any stated storage conditions, after which the intact package of food should not be consumed because of health and safety reasons.

Use or Storage:

includes use and storage.

WORDS OR TERMS SPECIFIC TO STANDARD 1.2.8 IN THE FSC AND/OR SECTION 11 OF THIS LABELLING GUIDE:

Average Energy Content:

means the energy content of a food determined by multiplying the average amount of each food component per 100 grams of the food by the energy factor for that food component and summing the amounts calculated for each using the following formula –

Average energy (kJ/100 g) = $\sum W_i F_i$ ie, $W_1 \times F_1 + W_2 \times F_2 + W_3 \times F_3 + W_4 \times F_4 + \dots$ etc

Where W_i means the average weight of the food component (g/100g food), and F_i means the energy factor assigned to that food component (kJ/g).

The energy factors assigned to each food component are shown in the table below:

Food Component [Weight (in g) per 100g of the Food = W]	Energy Factor (kJ/g) [F]
Protein	17
Fat	37
Carbohydrate (excluding unavailable carbohydrate)	17
Unavailable carbohydrate (including dietary fibre)	8
Alcohol	29
Erythritol	1
Glycerol	18
Isomalt	11
Lactitol	11
Maltitol	13
Mannitol	9
Organic acids	13
Polydextrose	5
Sorbitol*	14
D-Tagatose	11
Xylitol	14

* Energy factor for sorbitol taken as an average of calculated range determined with or without ingestion of other foods.

[For example, if 100g of a particular food contained, on average:

10g of protein,
 3g of fat,
 50g of Carbohydrate,
 4g of dietary fibre,
 2g of citric acid (which is an organic acid),
 30g of moisture (ie, water which has no energy content), and
 1g Ash (ie, a measure of mineral content which has no energy content), and no other food components,

then the Average Energy Content would be:

$10 \times 17 + 3 \times 37 + 50 \times 17 + 4 \times 8 + 2 \times 13 = 170 + 111 + 850 + 32 + 26 = 1189\text{kJ}$,
 which after rounding, would be expressed as 1190kJ per 100g in the Nutrition Information Panel, since only three significant figures are permitted.]

Biologically Active Substance:

means a substance, other than a nutrient, with which health effects are associated.

Editorial note: Examples of biologically active substances are phytoestrogens. Antioxidants are also examples of biologically active substances.

Carbohydrate:

means –

(a) **carbohydrate by difference**, calculated by subtracting from 100, the average quantity expressed as a percentage of water, protein, fat, dietary fibre, ash, alcohol, and if quantified or added to the food, any other unavailable carbohydrate and the substances listed in column 1 of Table 2 to subclause 2(2), or

(b) **available carbohydrate**, calculated by summing the average quantity of total available sugars and starch, and if quantified or added to the food, any available oligosaccharides, glycogen and maltodextrins.

Dietary Fibre:

means that fraction of the edible part of plants or their extracts, or synthetic analogues that –

(a) are resistant to the digestion and absorption in the small intestine, usually with complete or partial fermentation in the large intestine, and

(b) promote one or more of the following beneficial physiological effects –

- (i) laxation,
- (ii) reduction in blood cholesterol,
- (iii) modulation of blood glucose,

and includes polysaccharides, oligosaccharides (degree of polymerisation >2) and lignins.

Energy Factor:

means the metabolisable energy (ME) of the food component calculated according to the following formula, expressed in kilojoules per gram of food component, rounded to the nearest whole number –

$$\text{ME} = \text{GE} - \text{FE} - \text{UE} - \text{GaE} - \text{SE}$$

Where –

ME means metabolisable energy

GE means gross energy (as measured by bomb calorimetry)

FE means energy lost in faeces

UE means energy lost in urine

GaE means the energy lost in gases produced by fermentation in the large intestine

SE means the energy content of waste products lost from surface areas

Energy factors in relation to the food components are listed in the Table shown above in the **Average Energy Content** definition in this Glossary.

Fat:

means total fat.

Gluten:

means the main protein in wheat, rye, oats, barley, triticale and spelt relevant to the medical conditions, Coeliac disease and Dermatitis herpetiformis.

Monounsaturated Fatty Acids:

means the total of cis-monounsaturated fatty acids and declared as monounsaturated fat.

NIP: [Abbreviation for the purposes of this Labelling Guide]

is the abbreviation used for Nutrition Information Panel in this Labelling Guide.

Standard NIP: [Term developed for the purposes of this Labelling Guide]

the minimum nutrition information required (when nutrition claims are NOT made) as shown by example (A) in Appendix 6 of this Labelling Guide.

Nutrition Claim:

means a representation that states, suggests or implies that a food has a nutritional property whether general or specific and whether expressed affirmatively or negatively, and includes a reference to –

- (a) energy, or
 - (b) salt, sodium or potassium, or
 - (c) amino acids, carbohydrate, cholesterol, fat, fatty acids, fibre, protein, starch or sugars, or
 - (d) vitamins or minerals, or
 - (e) any other nutrient, or
 - (f) a biologically active substance,
- but does not include –
- (g) a reference in a statement of ingredients, a prescribed name, or any other prescribed information, or
 - (h) the provision of particulars relating to a nutrient or energy that is required by Clause 5 of Standard 1.2.8 in the FSC, or
 - (i) a reference in the commonly accepted name of a food, or
 - (j) a reference to a quantitative or qualitative declaration of certain nutrients, ingredients or energy in the label where that declaration is required otherwise by the Act or the FSC, or
 - (k) a reference to a reduction in alcohol content.

Editorial note: 'Sweetened', 'salted' and 'calcium enriched' are examples of nutrition claims that are expressed affirmatively. Examples of nutrition claims that are expressed negatively are 'unsweetened', 'no added sugar' and 'low in fat'.

Examples of a reference in a commonly accepted name of a food are 'sweet corn', 'sweet potato' and 'sweetbread'.

A reference to a nutrient that is not required by Clause 5 in a nutrition information panel is a nutrition claim and, depending upon the nutrient claimed, may trigger the need for particulars of further nutrients to be included in the panel.

NOTE: **Nutrition Claims** are distinct from **Health Claims**. Refer to the definition of **Health Claims** in the Words or Terms Used Throughout this Labelling Guide section above.

Polyunsaturated Fatty Acids:

means the total of polyunsaturated fatty acids with cis-cis-methylene interrupted double bonds acids and declared as polyunsaturated fat.

Saturated Fatty Acids:

means the total of fatty acids containing no double bonds acids and declared as saturated fat.

Sugars:

means monosaccharides and disaccharides.

Trans Fatty Acids:

means the total of unsaturated fatty acids where one or more of the double bonds are in the trans configuration acids and declared as trans fat.

Unit Quantity:

means, in the case of a solid or semi-solid food, 100 grams or, in the case of a beverage or other liquid food, 100 millilitres.

WORDS OR TERMS SPECIFIC TO STANDARD 1.2.10 IN THE FSC AND/OR SECTION 12 OF THIS LABELLING GUIDE:**Characterising Component:**

means a component of a food that –

- (a) is mentioned in the name of a food, or
- (b) is usually associated with the name of a food by the consumer, or
- (c) is emphasised on the label of a food in words, pictures or graphics.

Editorial note: Two examples of characterising components of food are milkfat in ice cream and cocoa solids in chocolate. [Refer also to the definition of component given under the Standard 1.2.4 heading above.]

Characterising Ingredient:

means an ingredient or category of ingredients that –

- (a) is mentioned in the name of a food, or
- (b) is usually associated with the name of a food by the consumer, or
- (c) is emphasised on the label of a food in words, pictures or graphics, but does not include –
- (d) an ingredient or a category of ingredients which is used in small quantities for the purposes of a flavouring, or
- (e) an ingredient that is the sole ingredient of a food, or
- (f) a category of ingredients that comprises the whole of the food, or
- (g) an ingredient or category of ingredients which, while mentioned in the name of the food, is not such as to govern the choice of the consumer, because the variation in the quantity is not essential to characterise the food, or does not distinguish the food from similar foods.

eg, the apple in an apple pie is a characterising ingredient. [Refer also to the definition of ingredient given under the Standard 1.2.4 heading above.]

WORDS OR TERMS SPECIFIC TO STANDARD 1.3.1 (FOOD ADDITIVES) IN THE FSC AND/OR SECTIONS 7 AND 8 AND/OR APPENDIX 3 OF THIS LABELLING GUIDE:

Food Additive: [Based on the **Purpose** Section in Standard 1.3.1]

means any substance not normally consumed as a food in itself and not normally used as an ingredient of food, but which is intentionally added to a food to achieve one or more of the technological functions specified in Schedule 5 to Standard 1.3.1 in the FSC. It or its by-products may remain in the food. Food additives are distinguishable from processing aids (see the Standard 1.3.3 definition below) and vitamins and minerals added to food for nutritional purposes (see the Vitamins and Minerals definition in the **Words or Terms Used Throughout this Labelling Guide** section above).

Maximum Permitted Level: [Definition developed for the purposes of this Labelling Guide – based on the definition given in Standard 1.3.1 in the FSC and Clause 3 of Standard 1.3.1 in the FSC]

in relation to additives, means the maximum amount of additive which may be present in the food as set out in relation to that food in Schedule 1 to Standard 1.3.1 of the FSC. The proportion of additive used must also not exceed the maximum level necessary to achieve one or more technological functions under conditions of Good Manufacturing Practice (GMP).

Editorial note: The Codex Alimentarius Commission Procedural Manual sets out the following relevant criteria for use in assessing compliance with Good Manufacturing Practice [GMP]:

- (a) the quantity of additive added to food shall be limited to the lowest possible level necessary to accomplish its desired effect,*
- (b) the quantity of the additive that becomes a component of food as a result of its use in the manufacture, processing or packaging of a food and which is not intended to accomplish any physical, or other technical effect in the finished food itself, is reduced to the extent reasonably possible, and*
- (c) the additive is prepared and handled in the same way as a food ingredient.*

The manner in which a food is intended to be presented (eg, by the use of such quality descriptors as natural, pure, or traditional) may affect the type and level of food additives that could be used in accordance with GMP. Similarly, the type and level of food additives used may affect the way in which a food may be presented.

Processed Food:

means food which has undergone any treatment resulting in a substantial change in the original state of the food.

Editorial note: This definition of 'processed food' is used to determine some additive permissions. Processes such as dividing, parting, severing, boning, mincing, skinning, paring, peeling, grinding, cutting, cleaning, trimming, deep-freezing or freezing, milling or husking, packing or unpacking are not considered to result in a substantial change to the original state of the food.

Technological Function:

means a function set out in Schedule 5 to Standard 1.3.1 of the FSC, but does not include the addition of a food additive to a single ingredient food that is not required by the FSC to be labelled where a single process is applied and the food is presented in a manner which suggests that the organoleptic qualities have not been altered, other than through the process.

Editorial note: When prawns are cooked, they generally turn red in colour. If a red food colour was also added to cooked prawns, consumers may be misled into believing that the red quality was attributable to the cooking process, and not the addition of a red food colour.

Food that has been smoked generally has a 'smoky' taste. If a smoke flavouring substance was also added to a smoked food, consumers may be misled into believing that the smoke taste was attributable to the smoking process, and not the addition of a smoke flavouring substance.

Examples of Technological Functions include acidity regulator, colouring, colour fixative, emulsifier, flavour enhancer, raising agent.

WORDS OR TERMS SPECIFIC TO STANDARD 1.3.2 (VITAMINS AND MINERALS) IN THE FSC AND/OR SECTION 11 AND APPENDIX 3 OF THIS LABELLING GUIDE:**Claimable Food:**

means a food which consists of at least 90% by weight of –

- (a) (i) primary foods, or
 - (ii) foods listed in the Table to Clause 3 of Standard 1.3.2 in the FSC, or
- (b) (i) a mixture of primary foods, and/or
 - (ii) water, and/or,
 - (iii) foods listed in the Table to Clause 3 of Standard 1.3.2 in the FSC excluding butter, cream and cream products, edible oils, edible oil spreads and margarine.

eg, boiled potatoes would be a claimable food since they are more than 90% potato, but potato crisps are not a claimable food, since they comprise more than 10% added fat (used in frying), so are less than 90% potato (a primary food – see below).

Primary Food:

means fruit, vegetables, grains, legumes, meat, milk, eggs, nuts, seeds and fish.

Reference Quantity:

means –

(a) in relation to a food specified in the Table to Clause 3 of Standard 1.3.2 in the FSC, either the quantity specified in that Table for that food or, in relation to a food which requires dilution or reconstitution according to directions, the quantity of the food which when diluted or reconstituted produces the quantity specified in Column 2 of the Table, or

(b) in relation to all other claimable foods, either a normal serving or, in relation to a food which requires dilution, reconstitution, draining or preparation according to directions, the quantity of the food which when diluted, reconstituted, drained or prepared produces a normal serving.

WORDS OR TERMS SPECIFIC TO STANDARD 1.3.3 IN THE FSC AND/OR SECTIONS 7 AND 8 AND/OR APPENDIX 3 OF THIS LABELLING GUIDE:**EC [Number]:**

(Enzyme Commission number) means the number which the Enzyme Commission uses to classify the principal enzyme activity.

GMP:

means Good Manufacturing Practice.

*[Refer to the **Maximum Permitted Level** definition in relation to Standard 1.3.1 (Additives) above.]*

Maximum Permitted Level:

means the maximum amount of the processing aid which may be present in the food as specified in the Tables to Clauses 3 to 18 in the FSC.

Processing Aid:

means a substance listed in Tables in Clauses 3 to 18 of Standard 1.3.3 in the FSC, where –

(a) the substance is used in the processing of raw materials, foods or ingredients, to fulfil a technological purpose relating to treatment or processing, but does not perform a technological function in the final food, and

(b) the substance is used in the course of manufacture of a food at the lowest level necessary to achieve a function in the processing of that food, irrespective of any maximum permitted level specified.

[Refer to the FSC itself for the Tables mentioned above.]

WORDS OR TERMS SPECIFIC TO STANDARD 1.5.1 IN THE FSC AND/OR SECTION 8 AND/OR APPENDIX 3 OF THIS LABELLING GUIDE:

Non-Traditional Food:

means a food which does not have a history of significant human consumption by the broad community in Australia or New Zealand. *eg, Stevia, which is an intensely sweet herb, has been used extensively overseas as a natural sweetener, but has not had widespread use in New Zealand or Australia.*³⁰

Novel Food:

means a non-traditional food [see above] for which there is insufficient knowledge in the broad community to enable safe use in the form or context in which it is presented, taking into account –

- (a) the composition or structure of the product, or
- (b) levels of undesirable substances in the product, or
- (c) known potential for adverse effects in humans, or
- (d) traditional preparation and cooking methods, or
- (e) patterns and levels of consumption of the product.

NOTE: **Novel** in this context is different from the meaning in Standard 1.5.2 of the FSC (Food Produced Using Gene Technology).

Editorial note: Novel food includes novel foods used as ingredients in another food.

WORDS OR TERMS SPECIFIC TO STANDARD 1.5.2 IN THE FSC AND/OR SECTIONS 8 AND 13 OF THIS LABELLING GUIDE AND/OR APPENDIX 3 OF THIS LABELLING GUIDE:

A Food Produced Using Gene Technology:

means a food which has been derived or developed from an organism which has been modified by gene technology.

Editorial note: This definition does not include a food derived from an animal or other organism which has been fed food produced using gene technology, unless the animal or organism itself is a product of gene technology. [eg, bees may collect pollen from GM crops, but honey derived from bees is not considered to be a food produced using Gene Technology, unless the bees themselves are genetically modified. Similarly poultry meat from chickens fed food derived from GM soybean variants is not considered to be GM, unless the chickens themselves have been genetically modified.]

NOTE: *However, while these products derived from animals/organisms that have been fed GM food (but are not themselves GM) do not have to be GM labelled, it would be misleading to label products made from these animals/organisms as being GM free.*

Altered Characteristics:

means any of the matters specified in paragraphs 7(a), (b), (c) or (d) of Standard 1.5.2 in the FSC. That is –

- (a) the genetic modification has resulted in one or more significant composition or nutritional parameters having values outside the normal range of values for existing counterpart food not produced using gene technology,
- (b) the level of anti-nutritional factors or natural toxicants are significantly different in comparison to the existing counterpart food not produced using gene technology,
- (c) the food produced using gene technology contains a new factor known to cause an allergic response in particular sections of the population,
- (d) the intended use of the food produced using gene technology is different to the existing counterpart food not produced using gene technology.

eg, the High Oleic Acid Soybean Lines G94-1, G94-19 and G168 have been genetically modified to contain higher than normal levels of the monounsaturated fatty acid, oleic acid in comparison to normal non-GM counterpart soybeans. Therefore a significant nutritional parameter has a value outside the normal range of values for an existing counterpart food not produced using gene technology (see (a) above).

Conventional Breeding:

means all methods used to produce plants, excluding techniques that use gene technology.
NOTE: Producing plants from cuttings and grafting is not considered to use gene technology.

Gene Technology:

means recombinant DNA techniques that alter the heritable genetic material of living cells or organisms. *eg, inserting a bacterial gene into a soybean plant cell.*

Genetically Modified Food:

means food that is, or contains as an ingredient, including a processing aid, a food produced using gene technology which –

(a) contains novel DNA and/or novel protein, or

(b) has altered characteristics,

but does not include –

(c) highly refined food, other than that with altered characteristics, where the effect of the refining process is to remove novel DNA and/or novel protein,

(d) a processing aid or food additive, except where novel DNA and/or novel protein from the processing aid or food additive remains present in the food to which it has been added,

(e) flavours present in the food in a concentration no more than 1g/kg, or

(f) a food, ingredient, or processing aid in which genetically modified food is unintentionally present in a quantity of no more than 10g/kg [1%] per ingredient.

NOTE: This exemption would not apply if you KNOW there is sometimes GM Cross-Transfer to your food, even if the level of contamination is less than 1%, eg, if the same silos are used to store both non-GM and GM grains with no cleaning in between.

Line:

means –

(a) a plant, the genetic material of which includes a transformation event or events, or

(b) any plant, descended from the plant referred to in paragraph (a), that is the result of conventional breeding of that plant with –

(i) any other plant that does not contain a transformation event or events, or

(ii) any other plant that contains a transformation event or events, whether expressed as a line or event, that is listed in Column 1 of the Table to Clause 2 of Standard 1.5.2 in the FSC, but shall not be taken to mean any plant derived solely as a result of conventional breeding.

Novel DNA and/or Novel Protein:

means DNA or a protein which, as a result of the use of gene technology, is different in chemical sequence or structure from DNA or protein present in counterpart food which has not been produced using gene technology.

NOTE: Novel in this context is different from the meaning in Standard 1.5.1 of the FSC (Novel Foods).

Transformation Event:

means a unique genetic modification arising from the use of gene technology.

WORDS OR TERMS SPECIFIC TO STANDARD 1.5.3 IN THE FSC AND/OR SECTIONS 8 AND 14 AND/OR APPENDIX 3 OF THIS LABELLING GUIDE:

Irradiation:

means the processing of food by subjecting it to the action of ionising radiation, but does not include ionising radiation imparted to food by measuring or inspection instruments, **and 'irradiate' and 'irradiated' have corresponding meanings.**

Re-Irradiate:

does not include the irradiation of food –

(a) prepared from materials that have been irradiated at low dose levels (not exceeding in any case 1kGy) and are irradiated again, or

(b) which contains less than 50g/kg of irradiated ingredients, or

(c) where the required full dose of ionising radiation is applied to the food in divided doses for a specific technological reason, provided that the cumulative maximum radiation dose absorbed by the food does not exceed that specified in the Table to Clause 4 of Standard 1.5.3 in the FSC.

Technological Need:

in relation to the irradiation of food, refers to the minimum dose of ionising irradiation required to ensure the safety or quality of the food, provided the process is performed in accordance with good manufacturing practice, and includes the extension of shelf life, the destruction of certain bacteriological contamination or pest disinfestation.

WORDS OR TERMS SPECIFIC TO STANDARD 2.1.1 IN THE FSC AND/OR SECTIONS 5, 6 AND 8 OF THIS LABELLING GUIDE:

Bread:

means the product made by baking a yeast-leavened dough prepared from one or more cereal flours or meals and water.

Flour Products:

means the cooked or uncooked products, other than bread, of one or more flours, meals or cereals.

Flours or Meals:

means the products of grinding or milling of cereals, legumes or other seeds.

Wholegrain:

means the intact grain or the dehulled, ground, milled, cracked or flaked grain where the constituents – endosperm, germ and bran – are present in such proportions that represent the typical ratio of those fractions occurring in the whole cereal, and includes wholemeal.

Wholemeal:

means the product containing all the milled constituents of the grain in such proportions that it represents the typical ratio of those fractions occurring in the whole cereal.

WORDS OR TERMS SPECIFIC TO STANDARD 2.2.1 IN THE FSC AND/OR SECTIONS 0, 5, 6 AND 8 OF THIS LABELLING GUIDE:

Cured and/or Dried Meat Flesh in Whole Cuts or Pieces:

means meat flesh including any attached bone containing no less than 160g/kg [16%] meat protein on a fat free basis. *It is a category of processed meat, eg, dry cured hams or ham pumped with little or no water and non-meat extenders.*²²

Manufactured Meat:

means processed meat containing no less than 660g/kg of meat. *[A category of processed meat which has at least 66% by weight meat and so relatively little amounts of other ingredients, eg, honey glazed high quality ham.]*²²

Meat:

means the whole or part of the carcass of any buffalo, camel, cattle, deer, goat, hare, pig, poultry, rabbit or sheep, slaughtered other than in a wild state, but does not include –

- (a) the whole or part of the carcass of any other animal unless permitted for human consumption under a law of a State, Territory or New Zealand, or
- (b) avian eggs, or foetuses or part of foetuses.

*Editorial note: This definition of meat does not include eggs or fish, as such foods are regulated in Standards 2.2.2 and 2.2.3 respectively. The generic Standards in Chapter 1 of the FSC apply to foods in Chapter 2, Food Product Standards. In particular, it should be noted that Clause 3 of Standard 1.2.4 (regarding **all ingredients to be listed in a statement of ingredients**) applies to meat and meat products.*

Meat Flesh:

means the skeletal muscle of any slaughtered animal, and any attached –

- (a) animal rind, and
- (b) fat, and
- (c) connective tissue, and
- (d) nerve, and
- (e) blood, and
- (f) blood vessels, and
- (g) skin, in the case of poultry.

Meat Pie:

means a pie containing no less than 250g/kg [25%] of meat.

Offal:

means those parts of the carcass such as blood, brain, heart, kidney, liver, pancreas, spleen, thymus, tongue and tripe, but excludes meat flesh, bone and bone marrow.

Processed Meat:

means a meat product containing no less than 300g/kg [30%] meat, where meat either singly or in combination with other ingredients or additives, has undergone a method of processing other than boning, slicing, dicing, mincing or freezing, [for example, the addition of other ingredients or smoking, drying, salting, curing, fermenting, pickling, forming and cooking]²² and includes manufactured meat and cured and/or dried meat flesh in whole cuts or pieces. eg, sausages, ham, prosciutto²². *NOTE: Meat products containing other ingredients such that they comprise less than 30% meat, eg, terrines, rissoles, hamburger patties, are considered to be mixed foods, rather than processed meats.*²²

Sausage:

means meat that is minced, or comminuted meat or a combination thereof, which may be combined with other foods, encased or formed into discrete units, but does not include meat formed or joined into the semblance of cuts of meat. [Sausages are a category of processed meats and specific compositional requirements apply. Refer to Clause 3 of Standard 2.2.1 in the FSC itself.]²²

WORDS OR TERMS SPECIFIC TO STANDARD 2.2.2 IN THE FSC AND/OR SECTIONS 5, 6, 7 AND 8 OF THIS LABELLING GUIDE:

Egg:

means the reproductive body in shells obtained from any avian species, the shell being free from visible cracks, faecal matter, soil or other foreign matter.

Egg Products:

means the content of egg, as part or whole, in liquid, frozen or dried form.

Visible Cracks:

includes cracks visible by candling.

WORDS OR TERMS SPECIFIC TO STANDARD 2.2.3 IN THE FSC AND/OR SECTION 5, 6, 7 AND 8 OF THIS LABELLING GUIDE:

Fish:

means any of the cold-blooded aquatic vertebrates and aquatic invertebrates including shellfish, but does not include amphibians and reptiles.

Editorial note: Standard 2.2.3 does not define specific names for fish.

In New Zealand, guidance on the specific naming of fish may be found in the following publications:

(1) *Scientific names of fish, approved under Clause 32 of the **Animal Products (Specifications for Products Intended for Human Consumption) Notice 2000**, and*

(2) *the **Authorised Fish Names Circular (1995)** issued by the New Zealand Fishing Industry Agreed Implementation Standards pursuant to Regulation 19 of the Fish Export Processing Regulations 1995, and*

(3) *the Commerce Commission's booklet titled **Food Labelling, Promotion and Marketing – A Guide for Manufacturers, Importers and Retailers (1998)**.*

WORDS OR TERMS SPECIFIC TO STANDARD 2.3.1 IN THE FSC AND/OR SECTIONS 5, 6, AND 8 OF THIS LABELLING GUIDE:

Fruit and Vegetables:

means fruit, vegetables, nuts, spices, herbs, fungi, legumes and seeds.

Peeled and/or Cut Fruit and Vegetables:

means fruit and vegetables that are peeled and/or cut, whether or not they have been surface treated.

Surface Treated Fruit and Vegetables:

means fruit and vegetables harvested, washed and treated with permitted processing aids and food additives.

WORDS OR TERMS SPECIFIC TO STANDARD 2.3.2 IN THE FSC AND/OR SECTIONS 0, 5, 6 AND 8 OF THIS LABELLING GUIDE:

Jam:

means the product prepared by processing one or more of the following –

- (a) fruit, and
- (b) sugars or honey, and
- (c) fruit juice, and
- (d) concentrated fruit juice, and
- (e) water extracts of fruit,

and includes conserve, but excludes marmalade.

WORDS OR TERMS SPECIFIC TO STANDARD 2.4.1 IN THE FSC AND/OR SECTIONS 5, 6 AND 8 OF THIS LABELLING GUIDE:

Edible Oils:

mean the triglycerides and/or diglycerides of fatty acids of plant or animal origin.

Editorial note: All edible fats are included in the definition of edible oils. 'Plant' includes aquatic plants and 'animal' includes aquatic animals. This Standard does not define specific names for edible oils. Guidance on the specific naming of oils may be found in Codex Alimentarius 1983 Volume 8 – Fats, Oils and Related Products and the Agreement to Monitor Olive Oils and Olive Pomace Oils in Australia issued by the Australian Olive Oil Association.

WORDS OR TERMS SPECIFIC TO STANDARD 2.4.2 IN THE FSC AND/OR SECTIONS 5, 6 AND 8 OF THIS LABELLING GUIDE:

Edible Oil Spreads:

means a spreadable food composed of edible oils and water in the form of an emulsion of the type water-in-oil.

Margarine:

means an edible oil spread containing no less than 800g/kg of edible oils.

WORDS OR TERMS SPECIFIC TO STANDARDS 2.5.1, 2.5.2, 2.5.3, 2.5.4, 2.5.5, 2.5.6 AND 2.5.7 IN THE FSC AND/OR SECTIONS 5, 6, 7 AND 8 OF THIS LABELLING GUIDE:

Butter:

means a product derived exclusively from milk and products obtained from milk, principally in the form of an emulsion of the type water-in-oil.

Cheese:

means the ripened or unripened solid or semi-solid milk product which may be coated and is obtained by one or both of the following processes –

- (a) coagulating wholly or partly milk, and/or materials obtained from milk, through the action of rennet or other suitable coagulating agents, partially draining the whey which results from such coagulation, or
 - (b) processing techniques involving concentration or coagulation of milk and/or materials obtained from milk which give an end-product with similar physical, chemical and organoleptic characteristics as the product described in paragraph (a).
-

Components of Milk Products:

mean the components of the specified milk products listed in Column 1 of the Schedule to Standard 2.5.7 in the FSC in unbolded type.

Condensed Milks:

mean either, milk products obtained by the partial removal of water from milk with the addition of sugars, or milk products of the same composition obtained by any other process.

Cream:

means a milk product comparatively rich in fat, in the form of an emulsion of fat-in-skim milk, which can be obtained by separation from milk.

Dried Milks:

mean powdered milk products obtained by the partial removal of water from milk.

Evaporated Milks:

mean either, milk products obtained by the partial removal of water from milk by heat or milk products of the same composition obtained by any other process.

Fermented Milk:

means a milk product obtained by fermentation of milk and/or products derived from milk, where the fermentation involves the action of micro-organisms and results in coagulation and a reduction in pH.

Ice cream:

means a sweet frozen food made from cream or milk products or both, and other foods, and is generally aerated.

Milk:

means the mammary secretion of milking animals, obtained from one or more milkings for consumption as liquid milk or for further processing but excludes colostrum.

Processed Cheese:

means a product manufactured from cheese and products obtained from milk, which is heated and melted, with or without added emulsifying salts, to form a homogeneous mass.

Skim Milk:

means milk from which milkfat has been removed.

Yoghurt:

means a fermented milk where the fermentation has been carried out with lactic acid producing micro-organisms.

WORDS OR TERMS SPECIFIC TO STANDARD 2.6.1 IN THE FSC AND/OR SECTIONS 5, 6 AND 8 OF THIS LABELLING GUIDE:**Fruit Juice or Vegetable Juice:**

means the liquid portion, with or without pulp, obtained from –

(a) fruit or vegetables respectively, and

(b) in the case of citrus fruit, other than lime, the endocarp only of the fruit,

and includes products that have been concentrated and later reconstituted with water to a concentration consistent with that of the undiluted juice from which it was made.

Juice Blend:

means juice made from a blend of more than one juice.

WORDS OR TERMS SPECIFIC TO STANDARD 2.6.2 IN THE FSC AND/OR SECTIONS 5, 6 AND 8 OF THIS LABELLING GUIDE:**Brewed Soft Drink:**

means the product prepared by a fermentation process from water with fruit and/or vegetable extractives or fruit and/or vegetable infusions, and sugar, *eg, ginger beer*.

Electrolyte Drink:

means a drink formulated and represented as suitable for the rapid replacement of fluid, carbohydrates, electrolytes and minerals.

Electrolyte Drink Base:

means a solid or liquid which when made up, makes an electrolyte drink.

Formulated Beverage:

means a non-carbonated, water-based flavoured beverage that contains added vitamins and/or minerals, prepared from one or more of the following –

- | | |
|-----------------------------------|-----------------------------------|
| (a) water, and | (b) fruit juice, and |
| (c) fruit purée, and | (d) concentrated fruit juice, and |
| (e) concentrated fruit purée, and | (f) comminuted fruit, and |
| (g) orange peel extract, and | (h) mineral water, and |
| (i) sugars. | |

Fruit Drink:

means a product prepared from one or more of the following –

- | | |
|-----------------------------------|-----------------------------------|
| (a) fruit juice, and | (b) fruit purée, and |
| (c) concentrated fruit juice, and | (d) concentrated fruit purée, and |
| (e) comminuted fruit, and | (f) orange peel extract, and |
| (g) water, and | (h) mineralised water, and |
| (i) sugars. | |

Mineral Water or Spring Water

means ground water obtained from subterranean water-bearing strata that, in its natural state, contains soluble matter.

Non-Alcoholic Beverage:

means –

- (a) packaged water, or
- (b) a water-based beverage which may or may not contain other foods, except for alcoholic beverages, or
- (c) electrolyte drinks.

WORDS OR TERMS SPECIFIC TO STANDARD 2.6.3 IN THE FSC AND/OR SECTIONS 5, 6, 7, 8 AND 11 OF THIS LABELLING GUIDE:**Cold Water Extraction:**

means the aqueous suspension of kava using cold water only and excludes the use of any organic solvent.

Kava:

means –

- (a) a beverage obtained by cold water extraction, or
- (b) the dried or fresh form, of the peeled root and/or peeled rootstock, but excluding any root peelings and any of the aerial parts, of plants of the species *Piper methysticum*.

WORDS OR TERMS SPECIFIC TO STANDARD 2.6.4 IN THE FSC AND/OR SECTIONS 5, 6, 7, 8 AND 11 OF THIS LABELLING GUIDE:**Caffeine:**

means all caffeine present from whatever source in a formulated caffeinated beverage.

Formulated Caffeinated Beverage:

means a non-alcoholic water-based flavoured beverage which contains caffeine and may contain carbohydrates, amino acids, vitamins and other substances, including other foods, for the purpose of enhancing mental performance.

One Day Quantity:

in relation to formulated caffeinated beverage, means the maximum amount of that food that should be consumed in one day in accordance with the directions specified in the label.

WORDS OR TERMS SPECIFIC TO STANDARDS 2.7.1, 2.7.2, 2.7.3, 2.7.4 AND 2.7.5 IN THE FSC AND/OR SECTIONS 5, 6, 7, 8 AND 11 OF THIS LABELLING GUIDE:**A Reference to Beer:**

includes a reference to 'ale', 'lager', 'pilsener', 'porter' and 'stout'.

Beer:

means the product, characterised by the presence of hops or preparations of hops, prepared by the yeast fermentation of an aqueous extract of malted or unmalted cereals, or both.

Brandy:

means a spirit obtained from the distillation of wine, or fermented preparations of grapes or grape product.

Cider:

means the fruit wine prepared from the juice or must of apples and no more than 25% of the juice or must of pears.

Fruit Wine and/or Vegetable Wine:

means the product prepared from the complete or partial fermentation of fruit, vegetable, grains and/or cereals or preparations of those foods, other than that produced solely from grapes.

Fruit Wine and/or Vegetable Wine Product:

means a food containing no less than 700mL/L of fruit wine and/or vegetable wine, which has been formulated, processed, modified or mixed with other foods such that it is not a fruit wine and/or vegetable wine.

Geographical Indication:

means an indication, whether express or implied –

- (a) which identifies a spirit as originating in a particular country, locality or region, and
- (b) where a given quality, reputation or other characteristic of the spirit is essentially attributable to its origin in that particular country, locality or region.

Liqueur:

means a spirit flavoured or mixed with other foods, which contains more than 15% alcohol by volume, measured at 20°C.

Mead:

means the product prepared from the complete or partial fermentation of honey.

Perry:

means the fruit wine prepared from the juice or must of pears and no more than 25% of the juice or must of apples.

Spirit:

means a potable alcoholic distillate, including whisky, brandy, rum, gin, vodka and tequila, which, unless otherwise required by Standard 2.7.5 in the FSC, contains at least 37% alcohol by volume, produced by distillation of fermented liquor derived from food sources, so as to have the taste, aroma and other characteristics generally attributable to that particular spirit.

Standard Drink:

means the amount of a beverage which contains 10 grams of ethanol, measured at 20°C.

Wine:

means the product of the complete or partial fermentation of fresh grapes, or a mixture of that product and products derived solely from grapes.

Wine Product:

means a food containing no less than 700mL/L of wine as defined in this Standard, which has been formulated, processed, modified or mixed with other foods such that is not wine.

WORDS OR TERMS SPECIFIC TO STANDARD 2.8.1 IN THE FSC AND/OR SECTIONS 5, 6, 8 AND 11 OF THIS LABELLING GUIDE:**Icing:**

means a mixture of sugar and other foods for use as a coating and includes frosting, plastic icing and icing gel.

Sugars:

means –

- (a) hexose monosaccharides and disaccharides, including dextrose, fructose, sucrose and lactose, or
- (b) starch hydrolysate, or
- (c) glucose syrups, maltodextrin and similar products, or

- (d) products derived at a sugar refinery, including brown sugar and molasses, or
 - (e) icing sugar, or
 - (f) invert sugar, or
 - (g) fruit sugar syrup,
- derived from any source, but does not include –
- (h) malt or malt extracts, or
 - (i) sorbitol, mannitol, glycerol, xylitol, polydextrose, isomalt, maltitol, maltitol syrup or lactitol.

Editorial note: For the labelling of sugar as an ingredient refer to the Table to Clause 4 in Standard 1.2.4. The Table prohibits the use of the word 'sugars' in a statement of ingredients.

White Sugar:

means purified crystallised sucrose.

WORDS OR TERMS SPECIFIC TO STANDARD 2.8.2 IN THE FSC AND/OR SECTIONS 5, 6 AND 8 OF THIS LABELLING GUIDE:**Honey:**

means the natural sweet substance produced by honey bees from the nectar of blossoms or from secretions of living parts of plants or excretions of plant sucking insects on the living parts of plants, which honey bees collect, transform and combine with specific substances of their own, store and leave in the honey comb to ripen and mature.

NOTE: This is a prescribed name.

WORDS OR TERMS SPECIFIC TO STANDARDS 2.9.1 AND 2.9.2 IN THE FSC AND/OR SECTION 5, 6, 8 AND 11 OF THIS LABELLING GUIDE:**Follow-on Formula:**

means an infant formula product represented as either a breastmilk substitute or replacement for infant formula and which constitutes the principal liquid source of nourishment in a progressively diversified diet for infants aged from six months.

NOTE: This is a prescribed name.

Infant:

means a person under the age of 12 months.

Infant Formula:

means an infant formula product represented as a breast milk substitute for infants and which satisfies the nutritional requirements of infants aged up to four to six months.

NOTE: This is a prescribed name.

Editorial note: A reference to infant formula product may include a reference to infant formula but the converse does not apply.

Infant Formula Product:

means a product based on milk or other edible food constituents of animal or plant origin which is nutritionally adequate to serve as the principal liquid source of nourishment for infants.

Editorial note: The intent of this definition is to limit the addition of ingredients to infant formula product to ingredients that would be considered to be foods. The addition of an ingredient that is not considered to be a food is prohibited unless specifically permitted elsewhere in Standard 2.9.1 in the FSC.

Standard 1.5.1 contains prohibitions and restrictions relating to novel foods and novel food ingredients. Nothing contained in Standard 2.9.1 in the FSC permits infant formula products to contain novel foods or novel food ingredients that are not permitted in Standard 1.5.1.

Lactose Free Formula and Low Lactose Formula:

means infant formula products which satisfy the needs of lactose intolerant infants.

Medium Chain Triglycerides:

means triacylglycerols which contain predominantly the saturated fatty acids designated by 8:0 and 10:0.

Pre-Term Formula:

means an infant formula product specifically formulated to satisfy particular needs of infants born prematurely or of low birthweight.

Protein Substitute:

means L-amino acids and/or the hydrolysate of one or more of the proteins on which infant formula product is normally based.

Soy-Based Formula:

means an infant formula product in which soy protein isolate is the sole source of protein.

WORDS OR TERMS SPECIFIC TO STANDARD 2.9.2 IN THE FSC AND/OR SECTIONS 5, 6, 8 AND 11 OF THIS LABELLING GUIDE:**Cereal-Based Food:**

means a food for infants that is based on cereal.

ESADDI:

means, for a vitamin or mineral in Column 1 of Table 3 to Clause 8 of Standard 2.9.2 in the FSC, the estimated safe and adequate daily dietary intake specified for that vitamin or mineral in Column 2. *[Refer to the FSC itself for this Table.]*

Food for Infants:

means a food that is intended and/or represented for use as a source of nourishment for infants, but does not include –

- (a) infant formula products, and
- (b) formulated meal replacements, and
- (c) formulated supplementary foods, and
- (d) unprocessed fruit and vegetables.

Fruit-Based Food:

means a food for infants that is based on fruit. Infant means a person up to the age of 12 months.

Infant Formula Product:

means an infant formula product as defined in Standard 2.9.1 *[see above]*.

RDI:

means, for a vitamin or mineral in Column 1 of Table 2 to Clause 8 of Standard 2.9.2 in the FSC, the recommended dietary intake specified in relation to that vitamin or mineral in Column 2 calculated and expressed in the form specified in the Table.

Sugars:

includes honey.

Editorial note: Sugars is defined in Standard 2.8.1 [see above].

WORDS OR TERMS SPECIFIC TO STANDARD 2.9.3 IN THE FSC AND/OR SECTIONS 5, 6, 8 AND 11 OF THIS LABELLING GUIDE:

Formulated Meal Replacement:

means a single food or pre-packaged selection of foods that is sold as a replacement for one or more of the daily meals but not as a total diet replacement.

NOTE: This is a prescribed name.

Formulated Supplementary Food:

means a food specifically designed as a supplement to a normal diet to address situations where intakes of energy and nutrients may not be adequate to meet an individual's requirements.

NOTE: This is a prescribed name.

Formulated Supplementary Food for Young Children:

means a formulated supplementary food for children aged one to three years.

NOTE: This is a prescribed name.

Permitted Form:

means the form of vitamin or mineral specified in Column 2 of the Schedule to Standard 1.1.1 and in the case of formulated meal replacements, those listed in Column 2 of the Schedule to Standard 2.9.4.

Serving:

means a quantity of the food which constitutes one normal serving when prepared according to manufacturer's directions or when the food requires no further preparation before consumption, and in the case of a formulated meal replacement is equivalent to one meal.

Editorial note: Recommended Dietary Intake (RDI) and Estimated Safe and Adequate Daily Dietary Intake (ESADDI) are defined in Standard 1.1.1 for the purposes of this Standard [see above].

WORDS OR TERMS SPECIFIC TO STANDARD 2.9.4 IN THE FSC AND/OR SECTIONS 5, 6, 8 AND 11 OF THIS LABELLING GUIDE:

Formulated Supplementary Sports Food:

means a food or mixture of foods specifically formulated to assist sports people in achieving specific nutritional or performance goals.

NOTE: This is a prescribed name.

One-Day Quantity:

in relation to formulated supplementary sports food, means the amount of that food which is to be consumed in one day in accordance with directions specified in the label.

WORDS OR TERMS SPECIFIC TO STANDARD 2.10.1 IN THE FSC AND/OR SECTIONS 5, 6, 8 AND 11 OF THIS LABELLING GUIDE:

Vinegar:

means the sour liquid prepared by acetous fermentation, with or without alcoholic fermentation, of any suitable foodstuff.

Imitation Vinegar:

means the product prepared by mixing water and acetic acid.

WORDS OR TERMS SPECIFIC TO STANDARD 2.10.2 IN THE FSC AND/OR SECTION 5, 6, 8 AND 11 OF THIS LABELLING GUIDE:

Iodised Salt:

means a mixture of salt and –

- (a) potassium iodide or potassium iodate, or
- (b) sodium iodide or sodium iodate.

Reduced Sodium Salt Mixture:

means a product prepared from a mixture of sodium chloride and potassium chloride.

Salt:

means the crystalline product consisting predominantly of sodium chloride, that is obtained from the sea, underground rock salt deposits or from natural brine.

Salt Substitute:

means a food made as a substitute for salt consisting of permitted food additives.

Introduction

A number of standards in the FSC require that you determine the surface area of your food package. For example, inner packages having less than 30cm² surface area are exempt from the requirement to declare the allergens and food intolerance substances that are present. In addition, there are several standards which exempt small packages from some of the labelling requirements. The FSC defines a 'Small Package' as a package with a surface area of less than 100cm². This may sound relatively large, if you were to picture measuring 100cm in a straight line. However, area is not measured in a straight line, but rather is the product of two straight-line measurements multiplied together. For example, the area of a square piece of paper with 10cm sides = 10cm x 10cm = 100cm². This is only about the size of a piece of memo paper. If your product could be wrapped up inside one of those, it can probably be classified as a 'small package' under the FSC. As another example, the surface area of two children's small cardboard raisin packets (of approximately Net Weight 14g each) stacked one on top of the other, is about 90cm².

What is the Surface Area of a Package?

The surface area of a 3-dimensional object (such as a package of food) can be thought of as the total 'amount' of all the shapes that cover the object. The units for this measurement are distance squared (for example, cm²). In the context of the FSC the surface area of a package is the sum of the surface area of each **externally visible face** of the assembled package. This just means that non-visible or concealed areas, such as over-lapping areas underneath seams on the package or the twisted areas for a twist-wrapped food for example, are not included as part of the total surface area.

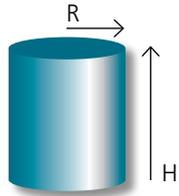
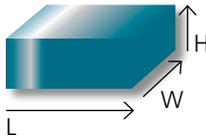
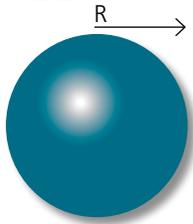
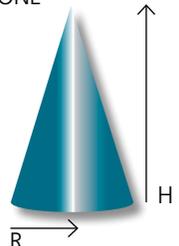
How is the Surface Area Calculated?

The easiest way to determine the surface area of your package is to take one of your filled finished product packages and:

1. Decide what 3-dimensional shape it is. For example, is it a cube (where all sides are of the same length), or is it a rectangular box or is it a cylinder (such as a can)?
2. Then use the appropriate mathematical formula as follows to calculate the total surface area of the package. Remember not to include any concealed areas of the wrapper or container:

Be careful! Units matter. Use cm for all measurements.

Surface Area Formulas:

Package Shape	Surface Area Formula
<p>CYLINDER</p> 	<p>Surface Area = Circle End Area x 2 + Curved Side Area</p> <p>Surface Area = $[(\pi \times R \times R) \times 2] + [2 \times \pi \times R \times H]$</p> <p>Where $R = \text{Radius of the End Circle}$, $\pi = 3.142$, and $H = \text{Height}$</p> <p>For example, if the radius is 3.75cm, and the height is 11cm:</p> <p>Surface Area = $[(3.142 \times 3.75 \times 3.75) \times 2] + [2 \times 3.142 \times 3.75 \times 11]$ = $[44.184 \times 2] + 94.26 = 88.369 + 259.215$ => Surface Area = 347.584cm² which is about the size of a standard 400g net sized can.</p>
<p>RECTANGULAR BOX</p> 	<p>Surface Area = End Area x 2 + Top (or bottom) Area x 2 + Side Area x 2</p> <p>Surface Area = $[(H \times W) \times 2] + [(W \times L) \times 2] + [(H \times L) \times 2]$</p> <p>Where $H = \text{Height}$, $W = \text{Width}$, and $L = \text{Length}$</p> <p>For example, if the height is 3cm, width is 4cm, and length is 5cm:</p> <p>Surface area = $[(3 \times 4) \times 2] + [(4 \times 5) \times 2] + [(3 \times 5) \times 2]$ = $[12 \times 2] + [20 \times 2] + [15 \times 2]$ = $24 + 40 + 30 = 94\text{cm}^2$ which is just a little under the size of a 'small package' in the context of the FSC.</p> <p>In the special case of a cube, where the length of all the sides of the box is the same:</p> <p>Surface area = $L \times L \times 6$, where $L = \text{Length of the sides}$.</p>
<p>SPHERE</p> 	<p>Surface Area = $4 \times \pi \times R \times R$</p> <p>Where $R = \text{Radius}$, and $\pi = 3.142$</p>
<p>CONE</p> 	<p>Surface Area = $\pi \times R \times \sqrt{[(R \times R) + (H \times H)]}$</p> <p>Where $\pi = 3.142$, $R = \text{Radius}$, and $H = \text{Height}$</p> <p>and $\sqrt{\quad} = \text{square root (for which you will need a calculator)}$.</p>

Introduction

Certain types of food (including food ingredients) are required to undergo safety assessment before they can be approved by FSANZ for use in foods for sale in New Zealand and Australia. These include:

- Novel Foods (as defined in the Glossary in Appendix 1)
- Genetically Modified Foods (as defined in the Glossary in Appendix 1)
- Irradiated Foods (as defined in the Glossary in Appendix 1 – see 'Irradiation')
- Food Additives (as defined in the Glossary in Appendix 1)
- Food Processing Aids (as defined in the Glossary in Appendix 1).

So UNLESS the above-mentioned foods/substances have been specifically approved by FSANZ for use in your type of food product, they cannot be used in your food product.

In addition, Nutritive Substances, which includes Vitamins and Minerals, Amino Acids, Electrolytes and Nucleotides, are not permitted to be added to foods UNLESS they have specifically been permitted by the FSC.

Finally, certain species of Plants and Fungi are not allowed to be added to food or offered for sale as food. The use of certain other species of Plants and Fungi in foods is restricted.

Novel Foods

What is a Novel Food?

Refer to the Glossary in Appendix 1 for an explanation of Novel Foods.

Novel Foods must be Approved for Use

The use of Novel Foods in New Zealand is prohibited, unless specific permission is given by listing the novel food in Column 1 of the Table to Clause 2 of Standard 1.5.1 in the FSC. *[Refer to the FSC itself for this Table.]* An example of a novel food that is not approved for use in New Zealand/Australia is Stevia. Stevia is a leafy green, intensely sweet herb which originated from Paraguay in South America. It's been used widely for centuries in that region. More recently it's been used extensively in Japan, since the late 1960s when certain artificial sweeteners were banned. Stevia plant extracts are a natural alternative to low calorie artificial sweeteners such as Aspartame. The extracts aren't metabolised by the body and are excreted so they are effectively calorie-free. But according to the FSC definition, Stevia is a novel food, since despite being consumed in other regions, there's no history of the broad community in Australia or New Zealand using Stevia. There may also be issues with 'known potential for adverse effects in humans'. Consequently, currently there's no permission for Stevia to be sold as a novel food or novel food ingredient under Standard 1.5.1 (or any approval as an additive for that matter) – so Stevia can't legally be sold as a food, or ingredient in a food, in New Zealand.²⁸

Even most Novel Foods that are approved (in the Table to Clause 2 of Standard 1.5.1), have conditions which must be met before they can be used in foods in New Zealand. These conditions are listed alongside the corresponding Column 1 name of the novel food, in Column 2 of the Table to Clause 2 of Standard 1.5.1 (eg, 'Diacylglycerol oil' is a prescribed name and it must be declared in the Ingredient Listing as 'Diacylglycerol oil'). Consequently, if your food, or any of its ingredients, is/are a little unusual, such that they would be considered to be Novel Foods or Novel Ingredients under the FSC, it is important to check them against the Table to Clause 2 of Standard 1.5.1 in the FSC. Novel foods or Ingredients that are NOT included in this Table are not allowed to be used. *NOTE: Contact the FSANZ advice line for assistance in determining if a food is 'novel': Email: advice@foodstandards.govt.nz, Phone: 0800 441 571.*

Genetically Modified Foods

What is a Genetically Modified (GM) Food?

Refer to Appendix 1 for the definition of what a Genetically Modified Food is. Notice that the definition for food produced using gene technology does NOT include food derived from an animal (or other organism) which has been fed Genetically Modified Food (UNLESS the organism itself has been Genetically Modified). You should consider the possibility that products derived from any of the following crops may be genetically modified (since Genetically Modified variants for these crops are commercially available): canola, chicory, cotton, corn, flax/linseed, lucerne, melon, papaya, potato, rice, soybean, squash, sugar beet, and tomato. So, obviously you would need to check with your supplier as to whether any products of those crops are genetically modified or not (please note that not all of these GM Crops are approved for use in New Zealand as at the time of preparing this guide).

GM Foods must be Approved for Use and Labelled

Genetically Modified Foods which have been approved for use in New Zealand are listed in Column 1 of the Table to Clause 2 of Standard 1.5.2 in the FSC. *[Refer to the FSC for this Table.]* Genetically Modified Foods or GM ingredients that are not listed in this Table are not allowed to be used in foods in New Zealand. Labelling of food, or ingredients with the words 'Genetically Modified' is required where novel DNA and/or novel protein is present in the final food, and/or where the food has 'altered characteristics' (such as different nutritional value, composition, end use, etc) as a result of the Genetic Modification. Please note that the word 'novel' in this context of GM Foods differs in meaning from that in 'Novel Foods' (refer to Appendix 1 for the meaning of 'Novel DNA/Protein' in the GM Foods context). Extra labelling is also required for Genetically Modified Food that has 'altered characteristics' (eg, foods comprising or containing GM Soybean Lines *[Crops]* developed to have high oleic fatty acid content must include a statement to the effect that the food's been 'genetically modified to contain high levels of oleic acid'). The 'Special Conditions' such as this are listed in Column 2 of the Table to Clause 2 of Standard 1.5.2 in the FSC.

[Refer to Section 13 for when and how to label Genetically Modified Foods, or foods containing them as ingredients.]

Irradiated Foods

What is an Irradiated Food?

Refer to Appendix 1 for the definition of what irradiation in relation to food means. Notice that 'irradiate' and 'irradiated' are equivalent to 'irradiation'.

Irradiated Foods must be Approved for Use and Labelled

Herbs and spices and herbal infusions (but not teas) and certain tropical fruits may be subjected to ionising radiation under specified conditions (mainly for pest disinfection, microbiological decontamination or to control sprouting). [Refer to the Table to Clause 4 of Standard 1.5.3 in the FSC for a list of these specific foods and conditions.] If a food, or an ingredient of a food, is not listed in Column 1 of the Table to Clause 4 of Standard 1.5.3 it is NOT allowed to undergo irradiation.

If your food product is or contains imported herbs, spices, herbal infusions and/or tropical fruits you would need to check whether or not they have undergone irradiation. This is especially important if they are from countries where irradiation of food is a common practice, such as Canada, France, the Netherlands, Portugal, Israel, Thailand, Russia, China, South Africa and the USA.

Labelling of irradiated foods or irradiated ingredients is mandatory. For example, a statement that the food has been 'TREATED WITH IONISING RADIATION' must be included on the label next to the name of the food, or the name of the ingredient (including generic names, eg, herbs and spices) in the Ingredient Listing (as appropriate) eg, 'Black Pepper (TREATED WITH IONISING RADIATION)', or 'Spices (TREATED WITH IONISING RADIATION)'. [Refer to Section 14 for how to label irradiated foods, or how to label foods containing irradiated ingredients or components.]

Food Additives

What is a Food Additive?

Food Additives are probably best defined by the Purpose Section of Standard 1.3.1, which regulates the use of Food Additives in foods: '*PURPOSE: A food additive is any substance not normally consumed as a food in itself and not normally used as an ingredient of food, but which is intentionally added to a food to achieve one or more technological functions specified in Schedule 5 [to Standard 1.3.1]. It or its by-products may remain in the [final] food. Food additives are distinguishable from processing aids (see Standard 1.3.3 [in the FSC]) and vitamins and minerals added to food for nutritional purposes (see Standard 1.3.2 [in the FSC]).*'

A Food Additive can only be used in your food product when it has been specifically permitted by Schedule 1 to Standard 1.3.1 of the FSC to be in that type of food. Also, Food Additives are only allowed to be added to food according to Good Manufacturing Practice, and in order to perform a technological function that is specified in Schedule 5 to Standard 1.3.1 in the FSC. [Refer to the FSC itself for this Schedule.] You cannot use a food additive to perform a technological function that is NOT listed in Schedule 5 to Standard 1.3.1. In the context of the FSC, 'Good Manufacturing Practice' just means that you must:

- (a) *only use the lowest possible level of additive needed to accomplish its desired effect (the technological function), and*
- (b) *the quantity of the additive that becomes a component of food as a result of its use in the manufacturing, processing or packaging of a food and which is not intended to accomplish any physical, or other technical effect in the food itself, is reduced to the extent reasonably possible, and,*
- (c) *the additive must be prepared and handled in the same way as a food ingredient (including meeting all the Identity and Purity requirements of Standard 1.3.4 of the FSC and being of food-grade quality).*²⁶

How do I Check that a Food Additive is Permitted to be Used in My Type of Food Product?^{25,26}

Firstly, check that the technological function that you want the additive to fulfil in your food product is included in Schedule 5 to Standard 1.3.1. If its technological function is not included in that schedule, you cannot use the additive in your food product.

There are four other Schedules to Standard 1.3.1 in the FSC – in general terms:

- Schedule 1 (refer to Standard 1.3.1 in the FSC for this Schedule) specifies the various maximum limits for additives that might be harmful if consumed in excessive amounts. For example, most of the preservatives like benzoic acid (210) and sodium metabisulphite (223) have specific limits in Schedule 1.

- Schedule 2 (refer to Standard 1.3.1 in the FSC for this Schedule) lists most of those additives that are not really so critical to food safety if consumed in large amounts. Many of the Schedule 2 additives are derived from natural sources, eg, the emulsifier, lecithin, which is commonly found in eggs and soybeans. When Additives listed in Schedule 2 are permitted to be used, no specific maximum levels are set, except that they must be used in accordance with GMP (so only the minimum level needed to achieve the desired effect can be used). It is important not to confuse this Schedule 2 to Standard 1.3.1 with the Schedule 2 to Standard 1.2.4. While they appear remarkably similar, Schedule 2 to Standard 1.2.4 lists ALL of the additives, whereas Schedule 2 to Standard 1.3.1 lists only those additives that are not so critical to food safety from a 'permissions' perspective. Consequently, the Schedule 2 in Standard 1.3.1 is only a *SUBSET* of the Schedule 2 in Standard 1.2.4. The purpose of Schedule 2 in Standard 1.2.4 is to provide a list of all the additive code numbers and their specific prescribed names (for Ingredient Listing purposes), whereas the purpose of Schedule 2 in Standard 1.3.1 is to indicate permissions for use in the specific food types as specified in Schedule 1 to Standard 1.3.1, for the additives listed.
- Schedule 3 (refer to Standard 1.3.1 in the FSC for this Schedule) lists the colours, many of which are derived from natural sources, that are not really critical to food safety if consumed in large amounts, eg, curcumins [*turmeric*] (100) and caramel II (150b). When Colours listed in Schedule 3 are permitted to be used, no *specific* maximum levels are set, except that they must be used in accordance with GMP (so only the minimum level needed to achieve the desired colour effect can be used).
- Schedule 4 (refer to Standard 1.3.1 in the FSC for this Schedule) specifies maximum limits for the chemical-dye-type colours, such as Sunset Yellow FCF (110) and Brown HT (155), which again might be harmful if consumed in excessive amounts. When colours in Schedule 4 are permitted to be used, the maximum limits are 290mg per kg in processed foods, and 70mg per Litre in beverages (other than those beverages that have limits specified in Schedule 1).

Schedule 1 to Standard 1.3.1 in the FSC lists the maximum amount of additive that may be present in a particular type of food (a 'Food Category'). [*Refer to Attachment 1 in the FSANZ User Guide for Food Additives for examples of foods covered by each of the food categories shown in Schedule 1 to Standard 1.3.1.*]²⁵

If permission is not given to use the additive in your type of food product by Schedule 1 of Standard 1.3.1, then that additive is NOT allowed to be used in your food product. However, notice that, in Schedule 1, some of the processed food types have an asterisk (*) next to them. This asterisk denotes that the additives listed in Schedules 2, 3 and 4 of Standard 1.3.1 are also permitted, at the corresponding level specified in each of those Schedules. In Schedule 1, the additive permissions in Foods are arranged in a **hierarchy** based on the primary commodity they are derived from and the processing they've undergone. For example, some of the Categories for fruits and vegetables are:

4. FRUITS AND VEGETABLES (including fungi, nuts, seeds, herbs and spices)

4.1 Unprocessed fruits and vegetables

4.2 Frozen unprocessed fruits and vegetables

4.3 Processed fruits and vegetables*

4.3.1 Dried fruits and vegetables*: – [*including* desiccated coconut as a sub-title]

4.3.2 Fruit and vegetables in vinegar, oil, brine or alcohol*

Categories 4.1, 4.2 and 4.3 are sub-categories of Category 4. Categories 4.3.1 and 4.3.2 are sub-categories of sub-category 4.3.

When the use of an additive is permitted in a general (higher order) Category, it is automatically permitted in ALL its sub-categories, UNLESS otherwise stated (eg, as a comment in the 'Qualifications' Column in the Schedule). Similarly, when an additive is permitted in a sub-category, its use is also allowed in any further sub-categories and in individually-named foods mentioned in a sub-category (such as desiccated coconut in the above example). For example, additive permissions listed for Category 4 in the above example also apply to Categories 4.1, 4.2 and 4.3. Permissions given for Categories 4.3, will also apply to sub-categories 4.3.1 and 4.3.2. Permissions given in sub-category 4.3.1 will also apply to Desiccated Coconut, and so on.

Permissions may be specified for a lower Category – such permissions amend the permissions coming from the next higher category above, but only in respect of the food additives listed under that lower category. The permissions for all other food additives specified for the higher category flow on to the next lower category in the usual way.^{25,27}

For example, to ascertain the food additives that are permitted to be added to desiccated coconut, and at what level²⁵:

Step 1 – Refer to Schedule 1 to Standard 1.3.1 in the FSC. Ascertain where desiccated coconut is located. Desiccated coconut is a sub-category of 4.3.1, which in turn is a sub-category of 4.3, which in turn is a sub-category of 4.

Step 2 – Again referring to Schedule 1 to Standard 1.3.1 in the FSC, identify what is allowable for each category, starting at the highest order category, ie, Category 4 – FRUITS AND VEGETABLES (including fungi, nuts, seeds, herbs and spices).

No food additives are allowed for this main category because none is specified. Clause 2 of Standard 1.3.1 says '*Unless expressly permitted in this standard, food additives must not be added to food.*'

Step 3 – In Schedule 1 to Standard 1.3.1 in the FSC, identify what is allowed for Category 4.3 – Processed Fruits and Vegetables. The asterisk (*) next to this Category Title indicates that food additives in Schedules 2, 3 and 4 are permitted. In the ‘Qualifications’ Column of Schedule 1, and corresponding to the 20mg/kg in the ‘Max Permitted Level’ Column under this Category 4.3, it states ‘ginger only’. This means that additive numbers, 220, 221, 222, 223, 224, 225 and 228, are permitted (according to GMP), but for GINGER ONLY, and are limited to the maximum level specified of 20mg/kg.

Step 4 – Identify what is allowed for Category 4.3.1 – Dried Fruit and Vegetables* in Schedule 1 to Standard 1.3.1 in the FSC. The asterisk (*) indicates that food additives in Schedules 2, 3 and 4 are permitted. Also food additive numbers 200, 201, 202, 203, 220, 221, 222, 223, 224, 225, and 228 are permitted to the levels specified: 1000mg/kg for the 1st 4 additives, 3000mg/kg for the remaining seven.

Step 5 – Identify what is allowed for desiccated coconut that is a Sub-category for 4.3.1. Food additive numbers 220, 221, 222, 223, 224, 225 and 228 are allowed, but to levels different from those allowed for the next higher Category 4.3.1, ie, only 50mg/kg of 220, 221, 222, 223, 224, 225 and 228 are permitted rather than the 3000mg/kg allowed for other Dried Fruits and Vegetables.

Result: The food additives permitted, and their corresponding maximum levels, for desiccated coconut are as follows:

- Food additives listed in Schedule 2 according to GMP
- Food additives listed in Schedule 3 according to GMP
- Food additives listed in Schedule 4 (up to 290mg/kg)
- Food additive numbers: 200, 201, 202, and 203 are permitted to the level (1000mg/kg) specified under category 4.3.1.
- Food additive numbers: 220, 221, 222, 223, 224, 225 and 228 to levels specified (50mg/kg) for the desiccated coconut sub-category under category 4.3.1.

Carry-over of Food Additives²⁵

Additive permissions for a ‘Mixed Food’ are covered under Category 20 of Schedule 1 to Standard 1.3.1 in the FSC. A ‘Mixed Food’ is one that is prepared using two or more commodity food ingredients, including water. A cake, sauce, mince pie and breakfast muesli are all examples of mixed foods. When the foods used as ingredients in a mixed food are allowed to contain food additives, these can be carried over into the mixed food. It’s not practical to give specific food additive permissions for all mixed foods since there are an almost infinite number of combinations of ingredients and possibilities. Consequently, the FSC permits a mixed food to contain the food additives permitted in the individual food category for each ingredient used, at levels in proportion with the amount of that individual food ingredient present in the final mixed food. For example, in breakfast muesli, additives permitted for the dried fruit pieces would therefore be allowed in the breakfast muesli, as would additives permitted for the dry cereals (such as rolled oats, bran and rye flakes) or those permitted for the nut pieces. This is provided the additive levels in each of the individual ingredients do not exceed their specified limits.

Maximum Levels Apply to the Final Food

Unless specified otherwise, the maximum level of additive permitted refers to the maximum amount that can be present in (1) the final food (as sold) OR (2) where there are directions for preparation on the label, when prepared according to those directions. An example of (1) above is desiccated coconut, where the maximum level of sulphites permitted would apply to the dried coconut (finished product), rather than to the fresh coconut (in-process raw material) to which they’re added during processing. An example of (2) above is dried soup mix, where the additive permissions would apply to the ready-to-drink soup, as made up with hot water according to label directions, and not to the levels in the dry powder form as sold.

Special Case of Two or more Additives Performing the Same Technological Function

To check additive permissions, when two or more additives are used in combination to achieve the same technological function in the food they are added to, you must divide the quantity of each additive added by its maximum permitted level for the food in question. The sum of the fractions calculated in this way is not allowed to exceed 1. If the sum of the fractions does exceed 1, the additives are present at too high a level, which is not allowed.

The editorial note (which is not legally binding) after Clause 6 in Standard 1.3.1 in the FSC provides the following example²⁷:

A food can have a maximum amount of 40mg/kg of Preservative X or 20mg/kg of Preservative Y. Some of the permitted combinations of the two preservatives are:

Preservative X [M]	Quantity for Preservative X [N = M/40]	Preservative Y [P]	Quantity for Preservative Y [Q= P/20]	Sum of Quantities [Sum = N + Q]
40mg/kg	1	nil	0	1
30mg/kg	0.75	5mg/kg	0.25	1
20mg/kg	0.5	10mg/kg	0.5	1
10mg/kg	0.25	15mg/kg	0.75	1
nil	0	20mg/kg	1	1

You can calculate the maximum amount of a second additive (Additive II) you are using to achieve the same technological function as another additive (Additive I), that you are already using in the same food product, as follows:

$$\text{Maximum amount of Additive II you can use} = \frac{\text{Maximum Level of Additive II permitted} \times \text{Amount of Additive I being used}}{\text{Max Level of Additive I permitted}}$$

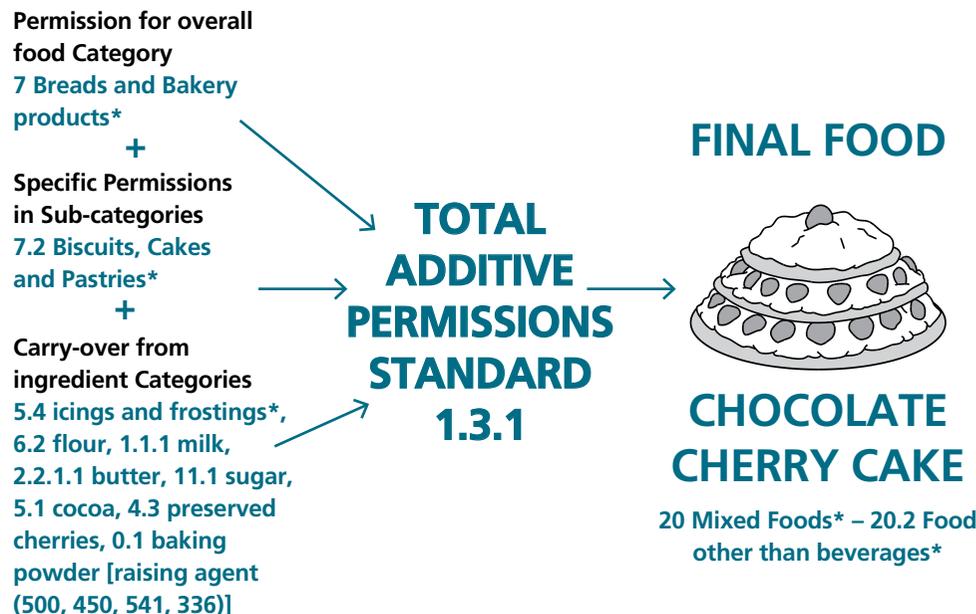
eg, using one of the editorial note examples, where Additive I = Preservative X, and Additive II = Preservative Y:

$$\text{Maximum amount of Preservative Y you can use} = \frac{\text{Maximum Level of Preservative Y permitted} \times \text{Amount of Preservative X being used}}{\text{Max Level of Preservative X permitted}}$$

$$\begin{aligned} \text{Maximum amount of Preservative Y you can use} &= 20 - \frac{30 \times 20}{40} \\ &= 20 - 600/40 \\ &= 20 - 15 \\ &= 5 \text{ mg/kg} \end{aligned}$$

So if you are already using 30mg/kg of Preservative X, then you can use no more than 5mg/kg of Preservative Y as well.

To summarise, the permission to use additives is determined as depicted below, using **chocolate cherry cake** as an example⁵:



Vitamins and Minerals

What are Vitamins and Minerals?

Vitamins and Minerals are not food additives in the FSC, but rather are defined as NUTRITIVE SUBSTANCES.

How do I Check that a Vitamin or Mineral is Permitted to be Used in My Type of Food Product?

Permissions to add and associated labelling requirements for Vitamins and Minerals are regulated by Standard 1.3.2 of the FSC as well as some food-specific requirements in the Chapter 2 Standards (eg, Formulated Meal Replacements [refer to Section 5 of this labelling guide]) of the FSC. Consequently, except for the following uses of Vitamins and Minerals specified in the FSC, no permission is given to add Vitamins and Minerals to foods:

- foods listed in Column 1 of the Table to Clause 3 of Standard 1.3.2 in the FSC, are allowed the vitamins/minerals specified in Column 3 of the Table up to the maximum permitted levels specified in Column 5 of the Table (NOTE: The maximum permitted level is the sum of both the ADDED and NATURALLY OCCURRING Vitamins/Minerals to/in the food),
- special purpose foods as specified in the Part 2.9 Standards of the FSC (eg, Infant Formula Products in Standard 2.9.1) [refer to Section 5],
- the addition of Iodine to certain Salt products (as specified in Standard 2.10.2 in the FSC),
- the addition of Thiamin to flour for Bread making (as specified in Standard 2.1.1 in the FSC),
- the addition of Vitamin D to Table Edible Oil Spreads and Margarine (as specified in Standard 2.4.2 in the FSC),
- the addition of Vitamins to Formulated Caffeinated Beverages (as specified in Standard 2.6.4 in the FSC) [refer to Section 5 of this labelling guide].

In addition, Vitamins and Minerals can only be added (in the circumstances outlined above) if they are in the permitted forms listed in Column 2 of the Schedule to Standard 1.1.1 [refer to Standard 1.1.1 in the FSC itself for this Schedule.]

Am I permitted to make a Nutrition Claim about a Vitamin or Mineral in my Food Product?

There are restrictions on the claims that can be made about the presence of Vitamins and Minerals in a food (whether Added or Naturally Occurring) [refer to Standard 1.3.2 in the FSC itself for the requirements if you are intending to make a Vitamin and/or Mineral Nutrition Claim.] For example, in order to make a Vitamin/Mineral Nutrition claim, your food product must be a 'Claimable Food' (as defined in the Glossary in Appendix 1 – see the note below) and it must meet a certain minimum percentage of the Recommended Dietary Intakes (% RDIs) or Estimated Safe and Adequate Daily Dietary Intakes (ESADDIs) requirements (eg, a minimum of 10% must be achieved for a PRESENCE claim [eg, 'contains Vitamin C'] and 25% for a 'GOOD SOURCE' claim [eg, 'rich in Vitamin C']). In addition, if a Vitamin and/or Mineral nutrition claim is made, certain nutrition information must be declared on the label, including the %RDI in a serving. This can be achieved as an entry in the Nutrition Information Panel (refer to Section 11).

NOTE: A 'CLAIMABLE FOOD' is a food which consists of at least 90% by weight of: (a) (i) primary foods, or (ii) foods listed in the Table to Clause 3 of Standard 1.3.2 in the FSC, or (b) (i) a mixture of primary foods, and/or (ii) water, and/or, (iii) foods listed in the Table to Clause 3 of Standard 1.3.2 in the FSC, excluding butter, cream and cream products, edible oils, edible oil spreads and margarine, where 'PRIMARY FOOD' means fruit, vegetables, grains, legumes, meat, milk, eggs, nuts, seeds and fish.

Prohibited and Restricted Plants and Fungi

Standard 1.4.4 of the FSC regulates Plants and Fungi. Schedule 1 to Standard 1.4.4 in the FSC lists the species of plants and fungi that must NOT be added to food or offered for sale as food, eg, the herb Borage. You need to check any plant/fungi-source ingredients you intend to use in your food product against that Schedule. Similarly, Schedule 2 to Standard 1.4.4 lists those plant and fungi species for which use is restricted, and it details what those restrictions are, so you must check all your plant/fungi-based ingredients against that Schedule also. eg, with St John's Wort there is a limit to the amount of natural toxicant hypericin allowed to be present (as specified in Clause 4 to Standard 1.4.1 Contaminants and Natural Toxicants (that maximum level is 2mg/kg)).

Food Processing Aids

What is a Processing Aid?

Processing Aids are defined in Standard 1.3.3 of the FSC as substances used in the processing of raw materials, foods or ingredients, to fulfil a technological purpose relating to treatment or processing, but do NOT PERFORM A TECHNOLOGICAL FUNCTION IN THE FINAL FOOD.

How do I Check that a Processing Aid is Permitted to be Used in My Type of Food Product?

Standard 1.3.3 of the FSC regulates the use of processing aids. Unless permission is given in this standard, processing aids must not be added to food. Also, in the course of manufacture of a food, processing aids must be used at the lowest level necessary to achieve a function in the processing of that food, irrespective of any maximum permitted level specified in Standard 1.3.3.

The following substances may be used in the course of manufacture of any food at a level necessary to achieve a function in the processing of that food:

- (a) foods, including water, and
- (b) food additives listed in Schedule 2 of Standard 1.3.1 in the FSC, and
- (c) processing aids specified in the Table to Clause 3 of Standard 1.3.3 in the FSC.

Various other substances are permitted to be used for specific purposes in Clauses 4 to 18 of Standard 1.3.3 in the FSC. For example, permitted antifoam agents are listed in the table to Clause 4 of Standard 1.3.3. Many of the processing aids have specific maximum permitted levels, although some are listed to be used according to GMP. Refer to the Tables to Clause 4 to 18 inclusive of Standard 1.3.3 in the FSC to check that any other substances you intend to use as processing aids are allowed, and also to check the maximum permitted levels at which they may be used.

NOTE: While Processing Aids would not normally be declared on the label, any of the allergens present in the Processing Aid, that are required by Clause 4 of Standard 1.2.3 in the FSC to be declared (refer to Section 7), must ALWAYS be included on the label. For example, consider gelatine. If you check the Additive permissions in Schedule 1 to Standard 1.3.1 (which is covered by sub-section 8.5 Animal Protein Products) you'll see that sulphur dioxide (220) is not allowed to be used as an additive in gelatine. Consequently, you can't use sulphur dioxide as an 'Additive' in gelatine. But in Standard 1.3.3 (Processing Aids), according to the Table to Clause 14 which lists 'Permitted processing aids with miscellaneous functions', sulphur dioxide is allowed to be used in the treatment of beef hides for use in gelatine and collagen manufacture, so it can be used as a 'Processing Aid' for that purpose. According to the Table to Clause 14 of Standard 1.3.3, the sulphur dioxide is allowed to be present in the final gelatine product at up to 750mg/kg. Since in the FSC sulphur dioxide can be considered to be an 'added sulphite which is present at more than 10mg/kg', its presence must still be declared on the label to comply with the mandatory declaration of certain substances requirements of Clause 4 of Standard 1.2.3 (refer to Section 7).

How to Calculate the Weight of Added Water or Volatile Ingredients in a Final (Cooked or Heated) Food Product¹²

Before calculating the amount of added water or volatile ingredient, first check using the flowchart in Section 8, Part 2, to determine if one of the exemptions from declaring it can be used. There is no point in doing this calculation if one of the exemptions applies.

- Step 1: Add up the weights of all the ingredients that are used to make a batch of the food. Do not include the weight of added water in this calculation unless the added water is used to reconstitute ingredients during manufacture, and do not include the weight of volatile ingredients (eg, alcohol). This total weight is 'T'.
- Step 2: Determine the weight of the final cooked or heated food that is being produced in the batch (by weighing it). This weight is 'U'.
- Step 3: Calculate the amount of added water or volatile ingredient remaining in the cooked or heated food by subtracting 'T' from 'U',

This weight is 'V',

$$\text{ie, } V = U - T.$$

If 'V' is zero or less (ie, a negative value), then added water or the volatile ingredient does not need to be declared in the Ingredient Listing since it is all lost during manufacture. If 'V' is more than zero[#] (ie, a positive value) then some added water or volatile ingredient remains in the final cooked or heated food.

- Step 4: Added water need only be declared if it is 5% or more of the final cooked or heated food. To work this out do the following calculation:

$$\frac{V}{U} \times 100 = W \%$$

If 'W' is less than 5, then the added water need not be declared in the Ingredient Listing.

NOTE: Where the value of V is greater than zero and the calculation includes both added water and added volatile ingredient, manufacturers need to determine how much of V is contributed by the added water and how much by the added volatile ingredient. In many cases the added volatile ingredient is known to be completely evaporated so V would be due to added water only. Where some added volatile ingredient remains, manufacturers should determine how much of the volatile ingredient remains and declare it and the added water accordingly.

How to Determine the Correct Descending Order Position of the Added Water or Volatile Ingredient in the Ingredient Listing¹²

If 'W' is 5 or greater then the added water will need to be declared and the weight 'V' should be used to determine the order of this declaration in the Ingredient Listing. Hence, 'Water' would be declared immediately before the ingredient that has the next highest weight less than 'V', and immediately after the ingredient that has the next lowest weight more than 'V'.

Ingredient Listing Example

Here is the Recipe List for a hypothetical Tropical Sauce Product as an example of compiling the Ingredient Listing:

Ingredients	In-going Weight (kg)	Percentage of Total In-going Weight	Percentage in Final (Cooked) Product
Water	43.000	40.28%	36.25%
Coconut cream, fresh, no water	42.000	39.34%	42.00%
Soy Sauce (water, hydrolysed vegetable protein, salt, stabiliser (412, 415), flavour enhancer (MSG), acid (330), sodium benzoate) [Volume = 7.395 L]	9.000	8.43%	9.00%
Mango, flesh, fresh, puréed	8.000	7.49%	8.00%
Juice, Pineapple, fresh	2.000	1.87%	2.00%
Juice, Mango, fresh	1.500	1.41%	1.50%
Salt (salt, anticaking agent (536))	1.000	0.94%	1.00%
Lecithin [from Soybeans, NOT egg]	0.250	0.23%	0.25%
TOTAL WEIGHT (in-going) OF UNCOOKED PRODUCT [Refer to Appendix 4]	106.750	100%	
*[T] Weight of uncooked product LESS the Weight of ADDED Water [Or Volatile Ingredients if applicable] (106.75 – 43 = 63.75)	63.75		
*[U] WEIGHT OF PRODUCT AFTER COOKING	100.000		100%
Therefore, water lost by evaporation during cooking [106.75kg – 100kg]	6.750		
*[V] Amount of the Originally Added Water [or Volatile Ingredients if applicable] remaining after cooking [43kg – 6.75kg] (and the corresponding percentage (%) of the cooked product weight *[W])	36.250		(36.25%) *[W]

* Refer to Appendix 1, and also to Appendix 4 of this Labelling Guide for what these letters represent for the purposes of this example.

The Ingredient Listing of the hypothetical Tropical Sauce Product could look like this:

INGREDIENTS: Coconut Cream (42%), Water, Soy Sauce (water, hydrolysed vegetable protein, salt, stabiliser (412, 415), flavour enhancer (621), acid (330), preservative (211)), Mango Puree (8%), Fruit Juice (3.5%), Salt, Emulsifier (322).

Contains Soybean Products.

OR an alternative Ingredient Listing for this product could be:

INGREDIENTS: Coconut Cream (42%), Water, Soy Sauce (water, hydrolysed vegetable protein, salt, stabiliser (guar gum, xanthan gum), flavour enhancer (MSG), acid (citric acid), preservative (sodium benzoate)) **[soybean product]**, Mango Puree (8%), Pineapple Juice (2%), Mango Juice (1.5%), Salt, Emulsifier (**soybean** lecithin).

NOTES:

- The ingredients have been listed across the page (left to right across the label), with each ingredient separated by a comma. It would also be acceptable to list the ingredients one beneath the other down the page (top to bottom down the label) without commas.
- It has been assumed that any evaporative water loss occurs from the added water first, before any is lost from other water- or moisture-containing ingredients. We can calculate from the difference in weights before and after cooking that 6.75kg of water must have been lost by evaporation, so that in the final cooked product only 36.25kg of the 43kg of water added originally remains. The added water position in the descending order is determined by how much of it remains in the final (cooked) product (refer to Appendix 4 for how to determine this). Consequently, the water must follow the coconut cream in the ingredient listing since there is more coconut cream than 'remaining' added water in the final product.
- Otherwise, all other ingredients are listed in descending order of the in-going weight (the before-cooking weight). For example, the fact that 'Soy Sauce' appears before 'Mango Puree' in the ingredient listing means there was more soy sauce used than there was mango puree used to make the sauce.
- The presence of soybean products has been highlighted in the Ingredient Listing. This is because soybeans are one of the allergens that must be declared – refer back to Section 7. Despite Sub-clause 8 (2) of Standard 1.2.4 of the FSC (and the instructions in Section 8, Part 3 of this labelling guide) requiring that the soybean lecithin must be declared as either 'Emulsifier (322)' or 'Emulsifier (lecithin)', it can be declared as 'Emulsifier (soybean lecithin)' in order to satisfy the requirements of Clause 4 of Standard 1.2.3 of the FSC regarding the mandatory declaration of certain allergens, such as soybean products. This is allowed because Clause 12 of Standard 1.1.1 of the FSC regarding 'Modification of Prescribed Statements' effectively states that 'a statement or information which is required by this Code [FSC] or the relevant Act to be included in a label or advertisement for food, may include words which modify that statement or information provided that those words do not contradict, or detract from the intended effect of, the required statement or information.'

- The percentages (%) of some of the ingredients has been provided in the ingredient Listing. The reason for this is that they are Characterising Ingredients. This will be explained later in Section 12.
- In the soy sauce compound ingredient, the sodium benzoate additive would be acting as a preservative, so it must be declared as either: 'preservative (sodium benzoate)' or 'preservative (211)'.
- Since the soy sauce compound ingredient is present at more than 5% in the final (cooked) product, ALL of its constituent sub-ingredients must be included in the ingredient listing. For the above example, it had been understood that the producer of the Tropical Sauce Product purchases the soy sauce from a supplier who is not willing to part with their recipe of the soy sauce. Consequently, the sub-ingredients of the soy sauce are included in brackets after the words 'soy sauce' in the Ingredient Listing. Had the producer made the soy sauce first themselves (or if the supplier had told the producer the relative amounts of each ingredient in the soy sauce), the ingredient Listing could have been written like this (as another alternative):

INGREDIENTS: Water, Coconut Cream (42%), Mango Puree (8%), Pineapple Juice (2%), Mango Juice (1.5%), Hydrolysed Vegetable Protein, Salt, Emulsifier (322), Stabiliser (412, 415), Flavour Enhancer (621), Acid (330), Preservative (211).

Contains Soybean Products.

[For the purposes of this last example, the hypothetical soy sauce recipe is:

6.75kg Water, 1.25kg Hydrolysed Vegetable Protein, 0.25kg Salt, 0.2kg Stabiliser (412, 415), 0.2kg Flavour Enhancer (MSG), 0.18kg Acid (330), and 0.17kg Sodium Benzoate.]

Notice that, in this last example: (1) all the sub-ingredients of the soy sauce have now been listed separately, as if they were themselves added separately to produce the product, and (2) the water in the soy sauce has been included with the other added water, which has changed the position of the water in the ingredient listing (since with the extra water from the added soy sauce, the total added water ends up being more than the 42kg of coconut cream present in the final cooked product (even after taking into consideration the amount of water that is evaporated off during cooking)). Similarly, the salt in the soy sauce has been added to the salt added separately, but the extra salt from the soy sauce was not sufficient to change the 'descending order' position of the salt (however, the total weight of the salt is the same as the weight of the hydrolysed vegetable protein (HVP), so the order of the HVP and salt could be swapped if preferred). Please note that if you chose to declare the soy sauce this way, ALL the sub-ingredients must be declared regardless of the level of soy sauce in the product (ie, ALL the soy sauce's sub-ingredients must be declared even when the level is less than the 5%).

Further Examples

Below are two examples. Sample (a) in each example shows an Ingredient Listing that would NOT be compliant with the FSC requirements. Sample (b) shows how the incorrect, Sample (a), Ingredient Listing should have been written. These examples are only provided for the purpose of illustrating common errors made when compiling ingredient listings, and how to fix them.

INGREDIENT LISTING 1

(a) Lemon Flavoured Pikelets – **Wrong Way:**

X Flavour, Sugar, Salt, Egg, Milk, Oils, Self-Raising Flour.

NOTES:

Sample (a):

- It should be obvious that ingredients are not listed in descending order of ingoing weight – for example, it is very unlikely that there will be more flavour or salt, than there is self-raising flour. The Ingredient Listing order needs to be re-arranged into descending order.
- Self-Raising Flour is a compound ingredient, which in this case is present at considerably more than 5%. It comprises wheat flour and the baking powder additives, with code numbers 341, 450 and 500. Consequently, ALL of the self-raising flour's sub-ingredients must be included in the Ingredient Listing. Even if it were present at less than 5%, at least the additives must be declared since they would perform a technological function in the product (they are 'raising agents', which '*liberate gas and increase the volume of the food [pikelets]*' according to the Schedule 5 to Standard 1.3.1 in the FSC).
- Salt is also a compound ingredient, since it contains anticaking agent, but we know from the recipe that it is present at less than 5% in the cooked pikelets. Consequently, the anticaking agent does not need to be declared, since it does not perform an 'anticaking' effect in the cooked pikelets.
- Oils is a generic ingredient name, which is allowed, but subject to certain conditions, eg, you must at least specify whether the source is animal or vegetable. Another condition is that where the source is peanut, soybean or sesame seeds, the source name must be declared specifically. We know from the recipe that it is a blend of peanut oil and olive oil, so at least the peanut source name must be declared specifically, eg, 'Vegetable Oils (peanut, olive)'.

- Since 'Wheat' products is one of the gluten-containing cereal products that must be declared on all labels, it would be wise to specify that wheat is the source of the self-raising flour within the ingredient listing, or at least close to the ingredient listing (it must be prominent to comply with legibility requirements). However, the presence of a wheat product could be included anywhere on the label (provided legibility requirements are met). NOTE: 'Wheat Flour' is not 'Starch' (a common misconception), so it CANNOT be declared by the generic ingredient name, 'Starch', so the conditions for generic-named starch (of declaring that the source as being wheat ie, 'Wheat Starch') do not apply to wheat flour. But in any case, you must declare the presence of this wheat product (wheat flour) somewhere on the label, so if you just had 'flour' in the Ingredient Listing, you would need a statement such as 'Contains a wheat product' on the label too. Declaring the flour as 'wheat flour' within the Ingredient Listing is probably the less onerous option. It also ensures that the true nature of the ingredient is described.

INGREDIENT LISTING 1

(b) Lemon Flavoured Pikelets – **Right Way**:

- ✓ Self-Raising Flour (**wheat** flour, raising agent (341, 450, 500)), **Milk, Egg, Peanut** Oil, Sugar, Olive Oil, Salt, Flavour (contains a **soybean** product).

NOTES:

Sample (b):

- Ingredients are now listed in the correct descending order.
- All the sub-ingredients of the Self-Raising Flour are declared, since the self-raising wheat flour is present at more than 5%.
- Note that the additives, Calcium phosphate, monobasic (341), and Potassium pyrophosphate (450) are also minerals (and they are both acids too). However, they cannot be declared as minerals in this instance, since their **primary function** is to react with the Sodium bicarbonate (500) additive when wet to release carbon dioxide gas that produces the leavening effect, which is a 'raising agent' function. In addition, Potassium pyrophosphate is not one of the forms (specified in the FSC) that the mineral, phosphorous, is allowed to be added as. Similarly, although the 341 and 450 additives are both 'acids' they cannot be declared as 'acid' or even 'acidity regulator' since despite performing these functions in some other foods, that is not their **primary function** in this food (self-raising flour). The 341 and 450 must be declared as raising agents, along with the Sodium bicarbonate (500) additive, since that is their **primary function** in this particular food. The additive, sodium bicarbonate (500), is also an alkali. Again, it cannot be declared as an alkali, or even an acidity regulator, since **that is not its primary function in this food**. Please note that it would not be sufficient to declare the Self-Rising Flour as just '*Self-Raising Flour (wheat flour, baking powder)*' either, since the baking powder is basically made up of three additives for which rules apply as to how they can be declared in the Ingredient Listing (as described above). In addition, there are several different types of baking powder, comprising different mixtures of various acids and alkalis.

- The peanut oil is declared specifically (but the olive oil may be declared as just vegetable oil). You could also have achieved this by declaring the Oils as 'Vegetable Oils (peanut oil, olive oil)' – this would obviously alter the 'descending order' position of the oils too.
- We have shown that the source of the self-raising flour is wheat, to satisfy the mandatory allergen/intolerance substance declaration requirements of Clause 4 of Standard 1.2.3 of the FSC and also to describe the true nature of the ingredient. It is a good habit to always declare the source of the flour (eg, wheat, soybean, rice).
- While the **bold type** is not strictly required, all the allergens have been highlighted with bold type to benefit food allergy-sufferers.
- Notice that in this example, the flavour was known to contain a soybean product as one of its ingredients. While the other sub-ingredients of the flavour do not need to be declared, soybean products are one of the allergens which must be declared on the label.
- The 'Flavour' could have been declared as 'Flavouring' or 'Lemon Flavour' or 'Lemon Flavouring' if preferred (although, the presence of a **soybean** product would also need to be declared, in all of these cases).

INGREDIENT LISTING 2

(a) Apple Pie – **Wrong Way**:

- ✗ **Apple Filling**: water, dried apples with added vitamin c and sulphur dioxide, sugar, starch, spice, **Pastry**: flour, margarine, water, salt, turmeric, **Glaze**.

NOTES:

Sample (a):

- The Apple Filling and Pastry are compound ingredients, which in this case are present at considerably more than 5%. Consequently, ALL of their sub-ingredients must be included in the Ingredient Listing. The sub-ingredients must be enclosed in brackets. Similarly, the dried apple and margarine ingredients are compound ingredients present at more than 5% of the pie so all their sub-ingredients must be declared too.
- Salt is also a compound ingredient, since it contains anticaking agent, but we know from the recipe that it is present at less than 5% in the pie. Consequently, the anticaking agent does not need to be declared, since it does not perform an 'anticaking' effect in the finished pie.

- Although Ascorbic acid is also known as Vitamin C, the vitamin c in the dried apple is an additive which performs a technological function in the dried apple. The vitamin c (ascorbic acid) is actually acting as an antioxidant, so it must be declared as an antioxidant since that is its primary purpose in the dried apple ingredient. Similarly, the sulphur dioxide is acting as a preservative. Consequently, these additives must be declared as antioxidant and preservative respectively, followed by either their specific name or code number in brackets (see sample (b) below for how to declare them correctly). Similarly, despite turmeric also being a spice, the primary purpose of the turmeric is to act as a colour in the pastry, so it must be declared as a colour, rather than as 'turmeric' or as 'spice'.
- Since ingredients must be declared by either their common name, or a name that describes their true nature, or a generic name may be used (if one exists), some of the ingredients require a more detailed description so that their true nature is described so that consumers are not being misled, eg, 'dried apple slices' rather than just 'apple', 'corn starch' is preferable to just 'starch', 'wheat flour' rather than just 'flour', and 'Glaze [egg yolk]' rather than just 'Glaze'.
- Some of the ingredients are derived from the allergens that must be declared on the label. While these do not have to be declared in the ingredient listing specifically, it is a good idea to do so. This is where allergy-sufferers are likely to look first.

INGREDIENT LISTING 2

(b) Apple Pie – **Right Way A:**

- ✓ Apple Filling (50% of Pie): [water, dried apple slices (apple (14% of Filling or 7% of Pie), antioxidant (ascorbic acid), preservative (**sulphur dioxide**)), sugar, corn starch, spice],
Pastry (49% of Pie): [**wheat flour**, margarine (hydrogenated **soybean oil**, water, salt, emulsifier (**soybean** lecithin)), water, salt, colour (turmeric)], Glaze: [**egg yolk**].

NOTES:

Sample (b):

- The reason for the percentages (%) being included will be explained in Section 12.
- Notice that for additives [*in the appropriate descending order position*] the primary technological function class is declared first, and then the additives can be declared by either their specific name or their code number (see Alternative Right Way example) in brackets immediately after the technological function class. The applicable functions 'antioxidant', 'preservative', and 'colour' are all included in Schedule 1 to Standard 1.2.4 in the FSC. Consequently they must be used to declare the additives in this product.

- In this case the corn starch is not a modified starch, so it can be declared as 'corn starch'. 'Starch' is one of the generic ingredient names listed in the Table to Clause 4 of Standard 1.2.4 in the FSC. One of the conditions for using the generic name 'starch' that is specified in the Table is that the specific name of the cereal source must be declared where it is wheat, rye, barley, oats or spelt, or their hybridised strains. The source in this case is corn, which is not one of those listed as required to be declared specifically. However, including 'corn' as the source of the starch ensures that the true nature of the ingredient is described and it is also helpful for allergy-sufferers.
- The sulphur dioxide is present at more than 10mg/kg (10ppm) in the pie, so its presence (as a substance listed in the Table to Clause 4 of Standard 1.2.4 in the FSC which requires mandatory declaration) is required on the label. This can be achieved by declaring it specifically as sulphur dioxide [*as shown*] in the ingredient listing, or by including a separate statement on the label that added sulphites are present. It has been highlighted in bold type to assist asthma/ allergy-sufferers. The presence of other substances requiring mandatory declaration, namely wheat, soybean and egg products, is also highlighted.

OR:

INGREDIENT LISTING 2

(b) Apple Pie – **Alternative Right Way B:**

- ✓ APPLE FILLING (50% of Pie) [water, dried apple slices (apple (14% of Filling or 7% of Pie), antioxidant (300), preservative (220)), sugar, corn starch, spice], PASTRY (49% of Pie) [wheat flour, margarine (hydrogenated soybean oil, water, salt, emulsifier (322), water, salt, colour (100)), GLAZE [egg yolk]. Contains wheat, soybean and egg products and added sulphites.

NOTES REGARDING THE EXAMPLES IN THIS APPENDIX 6:

- The inclusion of the energy in calories (Cal) is optional rather than mandatory, and

$$\text{Energy in calories} = \text{Energy in kilojoules} \div 4.18$$

But the inclusion of energy in kJ is mandatory, regardless of whether or not the energy in calories is included.

- Sodium may be declared in either milligrams (mg), or BOTH mg and millimoles (mmol).
- Sub-group nutrients must be declared underneath the corresponding nutrient and indented slightly from it (eg, since gluten is a protein, gluten is a sub-group nutrient of protein, and must be declared as shown in example (I)). Similarly, sugars are sub-group nutrients of carbohydrate, so they must be declared as shown in example (A)). Except for Carbohydrate, when a nutrient has a sub-group nutrient beneath it, the nutrient must have the word 'total' immediately after it, eg, as shown for Protein in example (I).
- Sub-sub group nutrients must be declared underneath the corresponding sub-group nutrient and indented slightly from it, eg, since omega-6 fatty acids are polyunsaturated fatty acids, omega-6 is a sub-sub-group nutrient of the sub-group nutrient, polyunsaturated fatty acids, so omega-6 fatty acids must be declared as shown in example (B). Similarly, lactose and galactose are sugars, so are sub-sub-group nutrients of the sub-group nutrient, sugars, so lactose and galactose must be declared as shown in example (E)).
- Nutrients or biologically active substances that are not sub-groups of any of the other nutrients in the Nutrition Information Panel (NIP) must be declared at the bottom of the NIP, below the 'Sodium' entry, as shown in example (L).
- The NIP examples shown here are intended to depict the format required for nutrition claims made for various nutrients. If more than one nutrient is claimed, you must combine the formats shown in the corresponding examples for the claims of all those nutrients, without repeating any of the nutrients or biologically active substances in the NIP (ie, each nutrient, nutritive substance (eg, vitamins and minerals) or biologically active substance must appear only once in the NIP).
- Each nutrient, nutritive substance or biologically active substance must be in a separate row of the NIP.

(A) Standard NIP Format – the minimum nutrition information required (when nutrition claims are NOT made).

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg

(B) Format when claims are made in respect of one or more of the following: cholesterol, saturated fatty acids, trans fatty acids, polyunsaturated fatty acids, monounsaturated fatty acids, omega-6 fatty acids, omega-9 fatty acids (also refer to example (C) for omega-3 claims).

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
– trans	g	g
– polyunsaturated	g	g
– omega-6	g	g
– monounsaturated	g	g
– omega-9	g	g
Cholesterol	mg	mg
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
(insert any other nutrient or biologically active substance to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

NOTES: If an Omega-6 claim is not being made, the 'omega-6' row must be deleted.

If an Omega-9 claim is not being made, the 'omega-9' row must be deleted.

If a Cholesterol claim is not being made, the 'Cholesterol' row must be deleted.

~Delete the row marked with this symbol (~) if it does not apply.

(C) Format for when claims are made in respect of omega-3 fatty acids.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
– trans	g	g
– polyunsaturated	g	g
– omega-3	g	g
– alpha-linolenic acid	g	g
– docosahexaenoic acid	g	g
– eicosapentaenoic acid	g	g
– monounsaturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
(insert any other nutrient or biologically active substance to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

~Delete the row marked with this symbol (~) if it does not apply.

(D) Format when claims are made in respect of one or more of the following: fibre, any specifically named fibre, sugars, any other type of carbohydrate (also refer to example (E) for lactose claims).

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
– (insert any types of sugar to be declared) #	g	g
– (insert any other types of carbohydrate to be declared) #	g	g
Dietary fibre, total	g	g
– (insert any specifically named fibre to be declared) #	g	g
Sodium	mg	mg
(insert any other nutrient or biologically active substance to be declared) #	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

#Delete any of the rows marked with this symbol (#) that do not apply.

(E) Format for when claims are made in relation to the lactose content of the food.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
– lactose	g	g
– galactose	g	g
– (insert any types of sugar to be declared) #	g	g
– (insert any other types of carbohydrate to be declared) #	g	g
Dietary fibre, total	g	g
– (insert any specifically named fibre to be declared) #	g	g
Sodium	mg	mg
(insert any other nutrient or biologically active substance to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

~#Delete the row marked with these symbols (~ or #) if they do not apply.

(F) Format when carbohydrate has been calculated by difference, and unavailable carbohydrate (other than dietary fibre) has been subtracted in the calculation of 'carbohydrate by difference'.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
(insert the appropriate Unavailable Carbohydrate to be declared)	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)
(insert any other nutrient or biologically active substance to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

~Delete the row marked with this symbol (~) if it does not apply.

(G) Format when any of the following components are present at more than 5g per 100g of the food, and have been subtracted in the calculation of ‘carbohydrate by difference’: erythritol, glycerol, isomalt, lactitol, maltitol, mannitol, polydextrose, sorbitol, D-tagatose, xylitol.

(H) Format when carbohydrate has been determined as ‘available carbohydrate’ AND any of the following components are present at more than 5g per 100g of the food, AND have been quantified or added to the food (eg, as ingredients including additives): erythritol, glycerol, isomalt, lactitol, maltitol, mannitol, polydextrose, sorbitol, D-tagatose, xylitol.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
Erythritol #	g	g
Glycerol #	g	g
Isomalt #	g	g
Lactitol #	g	g
Maltitol #	g	g
Mannitol #	g	g
Polydextrose #	g	g
Sorbitol #	g	g
D-Tagatose #	g	g
Xylitol #	g	g
(insert any other nutrient or biologically active substance to be declared) #	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

#Delete any of the rows marked with this symbol (#) that do not apply.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
Erythritol #	g	g
Glycerol #	g	g
Isomalt #	g	g
Lactitol #	g	g
Maltitol #	g	g
Mannitol #	g	g
Polydextrose #	g	g
Sorbitol #	g	g
D-Tagatose #	g	g
Xylitol #	g	g
(insert any other nutrient or biologically active substance to be declared) #	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

#Delete any of the rows marked with this symbol (#) that do not apply.

(I) Format when a claim is made in relation to the gluten content of the food (including 'Gluten Free' claims, where the values shown will be 0g (zero)).

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein, total	g	g
– gluten	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
(insert any other nutrient or biologically active substance to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

~Delete the row marked with this symbol (~) if it does not apply.

(J) Format when a claim is made in relation to the salt, sodium and/or the potassium content of the food.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
Potassium	mg	mg
(insert any other nutrient or biologically active substance to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

~Delete the row marked with this symbol (~) if it does not apply.

(K) Format when a claim in relation to the vitamin or mineral content of the food is made.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
(insert the vitamin to be declared [eg, Vitamin C])	g, mg or µg (% RDI*) (or other units as appropriate)	g, mg or µg (or other units as appropriate)
(insert the mineral to be declared [eg, Manganese])	g, mg or µg (% RDI*) (or other units as appropriate)	g, mg or µg (or other units as appropriate)
(insert any other nutrient or biologically active substance to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

* RDI = Recommended dietary intake

~Delete the row marked with this symbol (~) if it does not apply.

NOTE: Allow one row per vitamin, and allow one row per mineral i.e. you must use a separate row for each vitamin or mineral claimed.

(L) The minimum nutrition information required when a nutrition claim is made for any other nutrient, or biologically active substance that is not mentioned in the previous examples (b) to (k) inclusive.

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Ave Quantity per Serving	Ave Quantity per 100g (or 100mL)
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg	mg
(insert any other nutrient [eg, alcohol, organic acids such as citric acid, etc] or biologically active substance [eg, antioxidants] to be declared) ~	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

~If a nutrition claim is NOT being made, delete the row marked with this symbol (~), since it does not apply.

Conditions for Making Certain Nutrition Claims

NOTES:

- (i) Product-specific conditions apply to the following foods (the appropriate FSC Standard must be consulted for these foods):
 - Electrolyte Drinks and Electrolyte Drink Bases covered by Standard 2.6.2
 - Formulated Caffeinated Beverages covered by Standard 2.6.4
 - Infant Formula Products and Foods for Infants covered by Standards 2.9.1 and 2.9.2 respectively
 - Formulated Meal Replacements and Formulated Supplementary Foods covered by Standard 2.9.3
 - Formulated Supplementary Sports Foods covered by Standard 2.9.4.

Refer to Appendix 1 for definitions of these foods.

- (ii) When nutrition claims are made, at the very least you must always have the **Standard NIP** information as shown in example (A) in Appendix 6, AND you must include in the NIP declarations of the claimed nutrient, nutritive substance or biologically active substance. This is required irrespective of any additional requirements outlined in the following table. Except that, in the case of small packages (ie, those with less than 100cm² surface area), when nutrition claims are made, as a bare minimum you must include on the label the average quantity of the claimed nutrient, nutritive substance and/or biologically active substance present in 100g (or 100mL if appropriate) of the food [the panel format is not necessary for small packages, but may used to present the information on the label if desired]. All of these requirements apply irrespective of any additional requirements outlined in the table below.

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
Claims in respect of fibre, any specifically named fibre, sugars and/ or any other type of carbohydrate.	<ul style="list-style-type: none"> • ‘High Fibre’ or ‘Good Source of Fibre’ • ‘Contains Fibre’ • ‘Good Source of Inulin’ [NOTE: <i>Inulin is a type of dietary fibre.</i>] • ‘High Glucose’ [NOTE: <i>Glucose is a type of sugar.</i>] • ‘Low Lactose’ or ‘Lactose Free’ [NOTE: <i>Lactose is a type of sugar.</i>] • ‘Low in Sugar’ • ‘No Added Sugar’ [NOTE: <i>This Claim could breach the Fair Trading Legislation or the Food Act if there is any naturally occurring sugar, or where sugar is present as a component of an ingredient, or where the food contains any added honey, malt, malt extract or maltose.²⁹</i>] • ‘Unsweetened’ or ‘Sweetened’ [NOTE: <i>The ‘Unsweetened’ Claim could breach the Fair Trading Legislation or the Food Act if there is any added honey, malt, malt extract or maltose, added artificial sweetening substance and/or added sorbitol, mannitol, glycerol, xylitol, hydrogenated glucose syrup or isomalt.²⁹</i>] • Voluntarily including dietary fibre, or a particular type of sugar, carbohydrate or fibre in the Nutrition Information Panel [when this has not been specifically required, eg, required because of certain other claims made] 	<p><i>[Also refer below to claims to the effect that the food is low lactose, reduced lactose or lactose free.]</i></p> <p>The Nutrition Information Panel [in addition to the Standard NIP information] must include declarations of the presence or absence of dietary fibre and declarations of the specifically named fibre, sugar and/or other type of carbohydrate claimed [refer to Section 11, Part 2 and Appendix 6.]</p> <p>In the case of small packages (having a surface area of less than 100cm²), the label must include declarations of the average quantity of energy, carbohydrate, sugars and dietary fibre present in 100g or 100mL (as appropriate) of the food, and the average quantity of the specifically named fibre, sugar and/or other type of carbohydrate claimed (as mentioned in NOTE (ii) opposite.)</p> <p><i>[Refer to Clauses 5 and 8 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims in relation to the polyunsaturated or monounsaturated fatty acid content of foods.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • ‘High in Polyunsaturated Fats’ • ‘Good Source of Polyunsaturated Fatty Acids’ • ‘Good Source of Monounsaturated Fat’ • ‘Good Sources of Omega-3 and Omega-6 Polyunsaturated Fats’ <i>[Also See Omega-3/6 Claims below]</i> • Voluntarily including the polyunsaturated and/or monounsaturated fatty acid content in the Nutrition Information Panel <i>[when this has not been specifically required, eg, required because of certain other claims made]</i> 	<p>(a) the total of saturated fatty acids and trans fatty acids must comprise no more than 28% of the total fatty acid content of the food, and</p> <p>(b) the fatty acid in respect of which the nutrition claim is made must comprise no less than 40% of the total fatty acid content of the food.</p> <p>AND</p> <p>The Nutrition Information Panel <i>[in addition to the Standard NIP information]</i> (or label in the case of small packages (ie, those with less than 100cm² surface area)) must include declarations of the saturated fatty acids, trans fatty acids, polyunsaturated fatty acids and monounsaturated fatty acids content of the food <i>[refer to Section 11, Part 2 and Appendix 6.]</i></p> <p><i>[Refer to Clause 12 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims using the word ‘omega’ in relation to the omega fatty acid content of the food.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • ‘Contains Omega-9 fats’ • ‘Rich Source of Omega-3 fats’ <i>[Also See Omega-3 Claims below]</i> • ‘Good Source of Omega-3 and Omega-6 Polyunsaturated Fats’ <i>[Also See Omega-3/6 Claims below]</i> • ‘Now You Can Get More of the Omega-3 and Omega-6 Fats’ <i>[Also See Omega-3/6 Claims below]</i> • Voluntarily including the omega-3, omega-6 or omega-9 fatty acid content in the Nutrition Information Panel <i>[when this has not been specifically required, eg, required because of certain other claims made]</i> <i>[Also See Omega-3/6/9 Claims below]</i> 	<p>The word ‘omega’ must be qualified by the type of omega fatty acid present and this qualification must appear immediately after the word ‘omega’. For example, ‘Omega-3’, ‘Omega-6’ and/or ‘Omega-9’.</p> <p><i>[Refer to Clause 13 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples (NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)	Conditions or Compositional Requirements	Claim Type	Examples (NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)	Conditions or Compositional Requirements
<p>Claims in relation to the Omega-3 fatty acid content of foods.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • ‘Contains Omega-3 fatty acids’ • ‘Source of Omega-3 fats’ • Voluntarily including the omega-3 fatty acid content in the Nutrition Information Panel <i>[when this has not been specifically required, eg, required because of certain other claims made]</i> 	<p>Unless the food is fish or a fish product that has no added saturated fatty acids, either:</p> <p>(a) the total of saturated fatty acids and trans fatty acids must be no more than 28% of the total fatty acid content of the food, or</p> <p>(b) the food must contain no more than 5g of saturated fatty acids and trans fatty acids per 100g of the food.</p> <p>AND</p> <p>The food must contain no less than either:</p> <p>(a) 200mg alpha-linolenic acid per serving, or</p> <p>(b) 30mg total eicosapentaenoic acid and docosahexaenoic acid per serving.</p> <p>AND</p> <p>Declarations in the Nutrition Information Panel <i>[in addition to the Standard NIP information]</i> must indicate the source and content of the Omega-3 fatty acids <i>[refer to Section 11, Part 2 and Appendix 6.]</i></p> <p>AND</p> <p>The Nutrition Information Panel (or label in the case of small packages (ie, those with less than 100cm² surface area)) must include declarations of the saturated fatty acids, trans fatty acids, polyunsaturated fatty acids, monounsaturated fatty acids and Omega-3 content of the food <i>[refer to Section 11, Part 2 and Appendix 6.]</i></p> <p><i>[Refer to Clause 13 of Standard 1.2.8 in the FSC.]</i></p>	<p>Claims that the food is a ‘good source’ of Omega-3 fatty acids, or words of similar meaning.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • ‘Now You can get More of the Omega-3 Fats’ • ‘Rich Source of Omega-3 Fats’ • ‘Good Source of Omega-3 and Omega-6 Polyunsaturated Fats’ • ‘High in Omega-3’ 	<p>Unless the food is fish or a fish product that has no added saturated fatty acids, either:</p> <p>(a) the total of saturated fatty acids and trans fatty acids must be no more than 28% of the total fatty acid content of the food, or</p> <p>(b) the food must contain no more than 5g of saturated fatty acids and trans fatty acids per 100g of the food.</p> <p>AND</p> <p>The food must contain no less than 60mg total eicosapentaenoic acid and docosahexaenoic acid per serving.</p> <p>AND</p> <p>Declarations in the Nutrition Information Panel <i>[in addition to the Standard NIP information]</i> must indicate the source and content of the Omega-3 fatty acids <i>[refer to Section 11, Part 2 and Appendix 6.]</i></p> <p>AND</p> <p>The Nutrition Information Panel (or label in the case of small packages (ie, those with less than 100cm² surface area)) must include declarations of the saturated fatty acids, trans fatty acids, polyunsaturated fatty acids, monounsaturated fatty acids and Omega-3 content of the food <i>[refer to Section 11, Part 2 and Appendix 6.]</i></p> <p><i>[Refer to Clause 13 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims in relation to the Omega-6 or Omega-9 fatty acid content of the food.</p>	<ul style="list-style-type: none"> • 'Contains Omega-6 and Omega-9 Fats' • 'Good Source of Omega-6 Polyunsaturated Fats' • 'Good Source of Omega-9 Monounsaturated Fats' • 'High in Omega-3 and Omega-6' <i>[Also See Omega-3 Claims above]</i> • Voluntarily including the Omega-6 and/ or Omega-9 fatty acid content in the Nutrition Information Panel <i>[when this has not been specifically required, eg, required because of certain other claims made]</i> 	<p>(a) The total of saturated fatty acids and trans fatty acids content of the food must be no more than 28 per cent of the total fatty acid content of the food, and</p> <p>(b) the fatty acid in respect of which the nutrition claim is made must comprise no less than 40 per cent of the total fatty acid content of the food.</p> <p>AND</p> <p>The Nutrition Information Panel <i>[in addition to the Standard NIP information] (or label in the case of small packages (ie, those with less than 100cm² surface area)) must include declarations of the saturated fatty acids, trans fatty acids, polyunsaturated fatty acids and monounsaturated fatty acids content of the food and also the Omega-6 and/or Omega-9 (as appropriate) content [refer to Section 11, Part 2 and Appendix 6.]</i></p> <p><i>[Refer to Clause 13 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Low joule claims in relation to the food.</p>	<ul style="list-style-type: none"> • <i>Use of terms such as 'Diet', 'Light', 'Lite', 'Low Energy'</i> • 'Low Cal' • 'Low Calorie' • 'Low in Kilojoules' • 'Low Joule' • 'Low Energy' • 'Low in Energy' 	<p>The average energy content of the food must be no more than:</p> <p>(a) 80kJ per 100mL in the case of beverages or other liquid foods, and</p> <p>(b) 170kJ per 100g in the case of solid or semi-solid foods.</p> <p><i>NOTE: Where a food is to be prepared as directed on the label, the average energy content of the food must be calculated for the food as prepared.</i></p> <p><i>[Refer to Clause 14 of Standard 1.2.8 in the FSC.]</i></p> <p>Obviously, the Energy content will be included in the Standard NIP information and, in the case of small packages (ie, those with less than 100cm² surface area) the average quantity of Energy per 100g (or 100mL as appropriate) must be declared on the label.</p>

Claim Type	Examples (NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)	Conditions or Compositional Requirements	Claim Type	Examples (NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)	Conditions or Compositional Requirements
<p>Claim to the effect that the food is low lactose.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • 'Low Lactose Formulation' • 'Low Lactose' 	<p>The food must contain no more than 0.3g of lactose per 100g of the food.</p> <p>The lactose and galactose content must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information]</i>. <i>[Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p>For small packages (ie, those with less than 100cm² surface area) the requirements are the same as those described above for small packages when fibre, sugars and other type of carbohydrate claims are made.</p> <p>Also refer to claims in respect of sugars above (dietary fibre must be declared also).</p> <p><i>[Refer to Clause 15 of Standard 1.2.8 in the FSC.]</i></p>	<p>Claim to the effect that the food is lactose free.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • 'Lactose Free' • 'Contains No Lactose' 	<p>The food must contain no detectable lactose. <i>NOTE: In addition to this FSC requirement, the food would also have to be completely free from lactose in order to comply with Fair Trading legislation.</i></p> <p>The lactose and galactose content must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information]</i>. <i>[Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p>For small packages (ie, those with less than 100cm² surface area) the requirements are the same as those described above for small packages when fibre, sugars and other type of carbohydrate claims are made.</p> <p>Also refer to claims in respect of sugars above (dietary fibre must be declared also).</p> <p><i>[Refer to Clause 15 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
Claim to the effect that the food is lactose reduced.	<ul style="list-style-type: none"> • '25% Lactose Reduced' • 'Contains 30% Less Lactose than Standard...' • 'Half the Lactose of Normal...' 	<p>The claim must be accompanied by a declaration of the proportion by which the lactose content of the food has been reduced, eg, '25% lactose reduced'.</p> <p>The lactose and galactose content must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information]</i>. <i>[Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p>For small packages (ie, those with less than 100cm² surface area) the requirements are the same as those described above for small packages when fibre, sugars and other type of carbohydrate claims are made.</p> <p>Also refer to claims in respect of sugars above (dietary fibre must be declared also).</p> <p><i>[Refer to Clause 15 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
Claim in relation to the gluten content of the food. <i>(also, see below)</i>	<ul style="list-style-type: none"> • 'High Gluten Flour for Bread Baking' • 'Gluten Free' • Voluntarily including the gluten content in the Nutrition Information Panel <i>[when this has not been specifically required, eg, required because of certain other claims made]</i> 	<p>The claim must be specifically permitted by the FSC. <i>NOTE: Gluten presence and high gluten content claims are permitted. [Refer to Clause 16 of Standard 1.2.8 in the FSC.]</i></p> <p>The gluten content must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information]</i> (or on the label in the case of small packages (ie, with less than 100cm² surface area)). <i>[Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p><i>NOTE: For 'Gluten Free' claims the average gluten content quantity would be 0g per Serving and 0g per 100g of the food.</i></p>

Claim Type	Examples (NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)	Conditions or Compositional Requirements	Claim Type	Examples (NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)	Conditions or Compositional Requirements
<p>Claim to the effect that the food is gluten free.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • 'Gluten Free' 	<p>The food must contain:</p> <p>(a) no detectable gluten, and</p> <p>(b) no –</p> <p style="padding-left: 20px;">(i) oats or their products, or</p> <p style="padding-left: 20px;">(ii) cereals containing gluten that have been malted, or their products.</p> <p><i>NOTE: In addition to these FSC requirements, the food would also have to be completely free from Gluten in order to comply with Fair Trading legislation.</i></p> <p>The gluten content must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information] (or on the label in the case of small packages (ie, with less than 100cm² surface area)).</i></p> <p><i>NOTE: The average gluten content quantity would be 0g per Serving and 0g per 100g of the food. [Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p><i>[Refer to Clause 16 of Standard 1.2.8 in the FSC.]</i></p>	<p>Claim to the effect that the food is low gluten.</p>	<ul style="list-style-type: none"> • 'Low Gluten' 	<p>The food must contain no more than 20mg gluten per 100g of the food.</p> <p>The gluten content must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information] (or on the label in the case of small packages (ie, with less than 100cm² surface area)). [Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p><i>[Refer to Clause 16 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims in relation to the salt, sodium and/ or potassium content of the food. <i>(also, see below)</i></p>	<ul style="list-style-type: none"> • ‘Low Sodium’ • ‘Low Salt’ • ‘Low Potassium’ • ‘Salted’ • ‘No Added Salt’ <i>NOTE: This Claim could breach the Fair Trading Legislation or the Food Act if there is any naturally occurring salt or sodium, or where salt or sodium is present as a component of an ingredient.²⁹</i> • Voluntarily including the potassium content in the Nutrition Information Panel <i>[when this has not been specifically required, eg, required because of certain other claims made]</i> 	<p>Both the potassium and sodium content of the food must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information]. [Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p>In the case of small packages (ie, with less than 100cm² surface area), the sodium and/or potassium content (as appropriate) per 100g (or 100mL if appropriate) must be declared on the label. <i>[Refer to Clause 17 of Standard 1.2.8 in the FSC.]</i></p> <p>Also, refer to vitamin/mineral claims below.</p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims to the effect that the food is low in salt or sodium content. <i>(also, see below)</i></p>	<ul style="list-style-type: none"> • ‘Low Sodium’ • ‘Low Salt’ • ‘Very Low Salt’ • ‘Very Low Sodium’ • ‘Unsalted’ • ‘Not Salted’ • ‘No Added Salt’* • ‘Salt Free’* <p><i>*NOTE: These Claims could breach the Fair Trading Legislation or the Food Act if there is any naturally occurring salt or sodium, or where salt or sodium is present as a component of an ingredient.²⁹</i></p>	<p>The food must contain no more than 120mg of sodium per 100g of the food, AND Both the sodium and potassium content of the food must be included in the Nutrition Information Panel <i>[in addition to the Standard NIP information]. [Refer to Section 11, Part 2 and Appendix 6.]</i></p> <p>In the case of small packages (ie, with less than 100cm² surface area), the sodium content per 100g (or 100mL if appropriate) must be declared on the label. <i>[Refer to Clause 17 of Standard 1.2.8 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims in relation to the vitamin and/or mineral content of the food.</p> <p><i>(also, see below)</i></p>	<ul style="list-style-type: none"> • 'High Calcium' • 'Contains Vitamin C' • 'Contains Iron which is Important in a Balanced Diet' • 'Source of Calcium and Zinc' • Voluntarily including a vitamin or mineral in the Nutrition Information Panel <i>[when this has not been specifically required, eg, required because of certain other claims made]</i> 	<p>In the case of claims in relation to the presence of vitamins/minerals, the food must be a 'claimable food' as defined in Appendix 1 and a serving of the food must contain at least 10% of the RDI or ESADDI (refer to Appendix 1 for the meaning of these terms), where an RDI and/or ESADDI has been established for that vitamin or mineral in the FSC.</p> <p>AND</p> <p>In addition to the Standard NIP (for packages that are not small), the label must include a statement containing the following information:</p> <p>(a) the serving size of the food, and</p> <p>(b) the number of servings per package of the food, and</p> <p>(c) the vitamin or mineral in respect of which the claim is made, and</p> <p>(d) the average quantity of the vitamin or mineral in 100g or 100mL of the food (as applicable), and</p> <p>(e) (i) the proportion of the RDI, of that vitamin or mineral contributed by one serving of the food, OR</p> <p>(ii) the average quantity of the vitamin or mineral for which an ESADDI exists in the Schedule to Standard 1.1.1 (in the FSC) in a serving of the food.</p> <p>(All this can be achieved by including the percentage (%) RDI in the Per Serving column of the NIP as shown in example (k) in Appendix 6). Alternatively, where an ESADDI has been prescribed in the FSC, the % RDI must be omitted from the example (k) in Appendix 6).</p> <p><i>[Refer to Clauses 4 to 9 inclusive of Standard 1.3.2 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims to the effect that the food is a good source of a vitamin and/or a mineral.</p>	<ul style="list-style-type: none"> • 'Rich in Vitamin C' • 'Good Source of Iron' • 'Good Source of Folate' 	<p>The food must be a 'claimable food' as defined in Appendix 1 and a serving of the food must contain at least 25% of the RDI or ESADDI (refer to Appendix 1 for the meaning of these terms), where an RDI and/or ESADDI has been established for that vitamin or mineral in the FSC.</p> <p>AND</p> <p>In addition to the Standard NIP (for packages that are not small), the label must include a statement containing the following information:</p> <p>(a) the serving size of the food, and</p> <p>(b) the number of servings per package of the food, and</p> <p>(c) the vitamin or mineral in respect of which the claim is made, and</p> <p>(d) the average quantity of the vitamin or mineral in 100g or 100mL of the food (as applicable), and</p> <p>(e) (i) the proportion of the RDI, of that vitamin or mineral contributed by one serving of the food, OR</p> <p>(ii) the average quantity of the vitamin or mineral for which an ESADDI exists in the Schedule to Standard 1.1.1 (in the FSC) in a serving of the food.</p> <p>(All this can be achieved by including the percentage (%) RDI in the Per Serving column of the NIP as shown in example (k) in Appendix 6. Alternatively, where an ESADDI has been prescribed in the FSC, the % RDI must be omitted from the example (k) in Appendix 6).</p> <p><i>[Refer to Clauses 4 to 9 inclusive of Standard 1.3.2 in the FSC.]</i></p>

Claim Type	Examples <small>(NOTE: These are just examples to illustrate claims of that type and claims are not limited to just those shown.)</small>	Conditions or Compositional Requirements
<p>Claims on Small packages to the effect that the food is fat-free or sugar-free.</p>	<ul style="list-style-type: none"> • 'No Sugar'* • 'Sugar-free'* <p><i>*NOTE: These Claims could breach the Fair Trading Legislation or the Food Act if there is any naturally occurring sugar, or where sugar is present as a component of an ingredient, or where the food contains any added honey, malt, malt extract or maltose²⁹.</i></p> <ul style="list-style-type: none"> • 'Fat-free' <p><i>NOTE: This claim could breach the Fair Trading Legislation or the Food Act if there is any naturally occurring fat.</i></p> <ul style="list-style-type: none"> • '98% Fat-Free' 	<p>For the 'Sugar-free'/'No Sugar' type claims the requirements are the same as those described above for small packages when fibre, sugars or other type of carbohydrate claims are made.</p> <p>The average quantity of Energy per 100g (or 100mL if appropriate) of the food must be declared on the label.</p>

1. NZFSA Website: www.nzfsa.govt.nz – used as general reference material.
2. FSANZ Website www.foodstandards.govt.nz – used as general reference material.
3. FSANZ User Guide: Legibility Requirements, July 2001.
4. Examples based on The Australian Trade Measurement (Pre-packed Articles) Regulations 1990 requirements for weight measures and volume measures.
5. Diagram from FSANZ, FSC Road-show Presentation, May 2002.
6. Example from FSANZ, Proposal P246, Labelling Omnibus Amendments To The Australia New Zealand Food Standards Code Final Assessment Report, Section 4.2 Issue 2 – Labelling of ‘Individual portion packs’, 26 June 2002.
7. Example from FSANZ, FSC Road-show Presentation, May 2002.
8. Example from FSANZ User Guide: Information Requirements for Foods Exempt from Bearing a Label, July 2001
9. Example from FSANZ, FSC Road-show Presentation, May 2002.
10. FSANZ User Guide: Information Requirements for Foods Exempt from Bearing a Label, July 2001.
11. Some examples from Allergy NZ Allergen Labelling Card Guides for various particular Food Allergies, showing Allergy-sufferers what words to watch out for on Food Labels and hidden sources of allergens.
12. FSANZ User Guide: Labelling of Ingredients, July 2001.
13. FSANZ User Guide: Representations About Food, August 2002.
14. The anticaking agent example is from the Website of the UK Institute of Food Science and Technology from the ‘Definitions of Some Words and Terms in Relation to Food Products and Processes’ link.
15. NZFSA: Identifying Food Additives Booklet, November 2002.
16. Examples from FSANZ User Guide: Date Marking, July 2001.
17. NZFSA Information Booklet for the Food Industry, Guide to Calculating the Shelf-life of Foods, February 2005
18. FSANZ User Guide: Percentage Labelling, July 2001.
19. UK MAFF Joint Food Safety and Standards Group Guidance Notes on Quantitative Ingredient Declarations (QUID) for the ‘Food Labelling (Amendment) Regulations 1998 and 1999’, June 1999.
20. Some of the content of Section 12 is based on the FSANZ, FSC Road-show Presentation, May 2002.
21. Examples from FSANZ User Guide: Overview of Food Labelling, July 2001
22. From FSANZ User Guide: Meat and Meat Products, July 2001
23. All Editorial Notes in the Glossary are Copied from the FSC.
24. FSANZ Fact Sheet: Surface Area of a Small Package, November 2002.
25. FSANZ User Guide: Food Additives, July 2001
26. Codex Alimentarius ‘General Standard for Food Additives’ Codex Standard 192-1995 (Rev. 5-2004).
27. Editorial Note in Standard 1.3.1 in the Australia New Zealand Food Standards Code.
28. Based on the Article ‘Clarification on Stevia from FSANZ’ published in the New Zealand Institute of Food Science and Technology Food New Zealand Journal, November/December Issue 2003.
29. FSANZ (formerly ANZFA) Code of Practice: Nutrient Claims in Food Labels and in Advertisements, January 1995.
30. FSANZ (formerly National Food Authority) Guide to Meeting the New Standard Drink Labelling Requirement for Alcoholic Beverages, April 1995.
31. Commerce Commission ‘Food Labelling, Promotion and Marketing’ A guide for manufacturers, importers and retailers to the Fair Trading Act, January 2000.



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FOOD SAFETY CONCERNS

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