Guidance for Developing Good Operating Practice Procedures: Product Information (Labelling and Composition)

August 2011

Amendment 1

Background

The Australia New Zealand Food Standards Code (the Code) includes standards for labelling and composition of foods sold in or imported into New Zealand. The purpose of the Code is to protect public health and safety, give consumers better information and minimise deceptive practices.

MAF has developed separate guides to assist food businesses to understand the labelling requirements in the Code. You should also refer to separate good operating practice guidance for Allergen Management where it is appropriate.

*The Fair Trading Act (198*6) prohibits false or misleading representation of food. It covers such issues as country of origin representations (where such information has been included on a food label) and health and nutrition claims. Refer to the Commerce Commission website for more information on fair trading.

1 Purpose / Scope

Write up your purpose and scope for Product Information (labelling and composition).

Example: To ensure that each product meets the regulatory requirements for labelling and composition.

See also:

- Incoming Materials;
- Allergen Management;
- Identification and Traceability.

These topics have been covered individually in other guidance documents..

2 Authorities and Responsibilities

Write up who is responsible for Product Information (labelling and composition). Think about managers, supervisors and other people as may be necessary.

Example: The business operator has the overall responsibility for product labelling and composition. Specific staff responsibilities are assigned as follows: [include specific details against a job title or role] e.g.:

- Product Development Manager ensures new products comply with the labelling and composition requirements.

3 Control Measures

Write up how you ensure you comply with the Food Standards Code requirements for product labelling and composition.

Consider at least the following points:

- how you ensure the accuracy of the ingredients list and nutritional information panel on labels of finished product;
- if a food is exempt from the requirement to have a food label, how you ensure you are able to supply the customer with certain information upon request (including information about potential allergens); and
- how you ensure specific compositional requirements are met (e.g. minimum meat content in meat pies; any food additives are as permitted; and that contaminant levels are not exceeded), e.g.:
  - re-checking these every time you change a product specification, ingredient(s), packaging or labelling; and
  - keeping up-to-date with any changes to the requirements in the Code (e.g. by subscribing to the notification service offered by FSANZ).

4 Monitoring

Write up how you check the Product Labelling and Composition requirements are being met.

Consider the following checks:

- check compliance of labelling against relevant Food Standards Code standards (e.g. use the MAF Labelling Guide [PDF (2 MB PDF)] and Summary Checklist [PDF (219 KB PDF)], carry out periodic in-house checks of product labels, check that the current version of the Food Standards Code is used).
- check composition requirements against relevant Food Standards Code standards (e.g. product and laboratory testing, formulation worksheets, etc.);
- monitor product labelling and composition complaints (refer to separate guidance for Complaints, Non-conforming Product, Corrective Action and Recall).

5 Corrective Action

Write up how you correct any problems that monitoring identifies, or that you otherwise become aware of.

Include how you cover the following:

1. Defining the extent of the problem (i.e. what has happened, why and when it happened, how it happened and whether any product is affected);
2. Restoring control (i.e. the action needed immediately to stop more product becoming affected and to fix problem);
3. Handling affected product (e.g. put affected product on hold until you decide what to do with it (see separate guidance on Complaints, Non-conforming Product, Corrective Action and Recall); follow-up and respond to customer complaints); and
4. Prevent re-occurrence (e.g. using information gained from the problem to identify better ways to do things; develop better procedures; improve checking systems; provide better staff training, etc.).

6 Documentation and Record Keeping

Determine what records you need to keep for this procedure. These will help you to introduce and maintain consistent good practices, and to demonstrate to your verifier (auditor) that you are sufficiently controlling those factors that can impact on the safety and suitability of the food.

Assess any records you already have, and introduce any additional records you need for the monitoring and corrective action activities you specify in your procedure. When monitoring, you may have an option to either:

- record every check; or
- indicate that checks have regularly been carried out (e.g. throughout a week) and only record the results of a specific check where something went wrong. In these instances, always make a record of what you did to put things right (the corrective action).

Keep blank record forms handy for staff to use and let people know where they are. Keep completed record forms together where they can be found easily for your regular internal verification checks.

For your general programme requirements refer to the guidance document on the appropriate risk-based programme or plan which can be found on the Food Safety website.