



Ministry for Primary Industries  
Manatū Ahu Matua



# Food Labelling Guide

Version Control June 2013



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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.

This *Food Labelling Guide* was developed by the New Zealand Food Safety Authority (NZFSA). Since then the NZFSA and MAF were amalgamated and subsequently renamed as Ministry for Primary Industries (MPI).

**[www.foodsafety.govt.nz](http://www.foodsafety.govt.nz)**

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

Check website for latest version: [www.foodsafety.govt.nz](http://www.foodsafety.govt.nz)

Issue Date	Section	Description	Food Standards Code
June 2013	Section 0	Introduction	
June 2013	Section 1	Main Flow Diagram – Labelling Overview	
June 2013	Section 2	Quantity Marking Requirements – Weights and Measures Regulations 1999 and Amendments Flowchart	
June 2013	Section 3	Do I need to Fully Label my Food Product? – Flowchart	Standard 1.2.1
June 2013	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	
June 2013	B	Food for catering purposes – Flowchart	
June 2013	Section 5	Does my Food Product or any of its Ingredients have Product-Specific Labelling Requirements? – Table	Chapter 2 Standards
June 2013	Section 6	Food Identification Labelling and Legibility Requirements – Flowchart	Standards 1.2.2 & 1.2.9
June 2013	Section 7	Warning and Advisory Statements and Declarations – Flowchart	Standard 1.2.3
June 2013	Section 8 Part 0	Statement of Ingredients – Introduction	Standard 1.2.4
June 2013	Part 1	Statement of Ingredients – Does my Food Product Require an Ingredient Listing? – Flowchart	Standard 1.2.4
June 2013	Part 2	Statement of Ingredients – Does this Ingredient Need to be Included in my Food Product's Ingredient Listing? – Flowchart	Standard 1.2.4
June 2013	Part 3	Statement of Ingredients – How should I Declare this Ingredient in my Ingredient Listing? – Flowchart	Standard 1.2.4
June 2013	Section 9	Date Marking – Flowchart	Standard 1.2.5
June 2013	Section 10	Storage Directions and Directions for Use and Storage – Flowchart	Standards 1.2.5 & 1.2.6
June 2013	Section 11 Part 0	Nutrition Information Panel (NIP) – Introduction	Standard 1.2.8
June 2013	Part 1	Nutrition Information Panel – Does my Food Product Require a Nutrition Information Panel (NIP)? – Flowchart	Standard 1.2.8
June 2013	Part 2	Nutrition Information Panel (NIP) – What does the NIP on my Product's Label need to Include? – Flowchart	Standard 1.2.8
June 2013	Section 12	Percentage Labelling	Standard 1.2.10
June 2013	Section 13	Genetically Modified Food Declarations – Flowchart	Standard 1.5.2
June 2013	Section 14	Irradiated Food Declarations – Flowchart	Standard 1.5.3
June 2013	Section 15	Summary Checklist	
June 2013	Appendix 1	Glossary	
June 2013	Appendix 2	Determining the Surface Area of a Package	
June 2013	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)	
June 2013	Appendix 4	How To Determine the Correct 'Descending Order' Position of Added Water and Other Volatile Ingredients in Cooked or Heated Foods	
June 2013	Appendix 5	Ingredient Listing Examples	
June 2013	Appendix 6	Nutrition Information Panel (NIP) Formats	
June 2013	Appendix 7	Conditions for Making Certain Nutrition Claims	
June 2013		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, e.g. 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.foodsafety.govt.nz](http://www.foodsafety.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 (e.g. print size and placement) requirements.
4. Complete instructions and answer questions encountered and follow the yes / no direction **indicated by the arrows** accordingly (i.e. 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 i.e. 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 MPI 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 (e.g. **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. MPI suggests you make changes to the checklist to suit your unique situation (e.g. 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 (e.g. sold retail via supermarket chain, wholesale, or intra-company transfer – refer to the definitions in Appendix 1) i.e. 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 labelling<sup>31</sup>. Refer to our website ([www.foodsafety.govt.nz](http://www.foodsafety.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

Ministry for Primary Industries:

- Factsheets.
- Information Booklet for the Food Industry, *Guide to Calculating the Shelf-life of Foods*, February 2005.
- *Identifying Food Additives* Booklet February 2013.

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](http://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](http://www.consumer-ministry.govt.nz)

Commerce Commission:

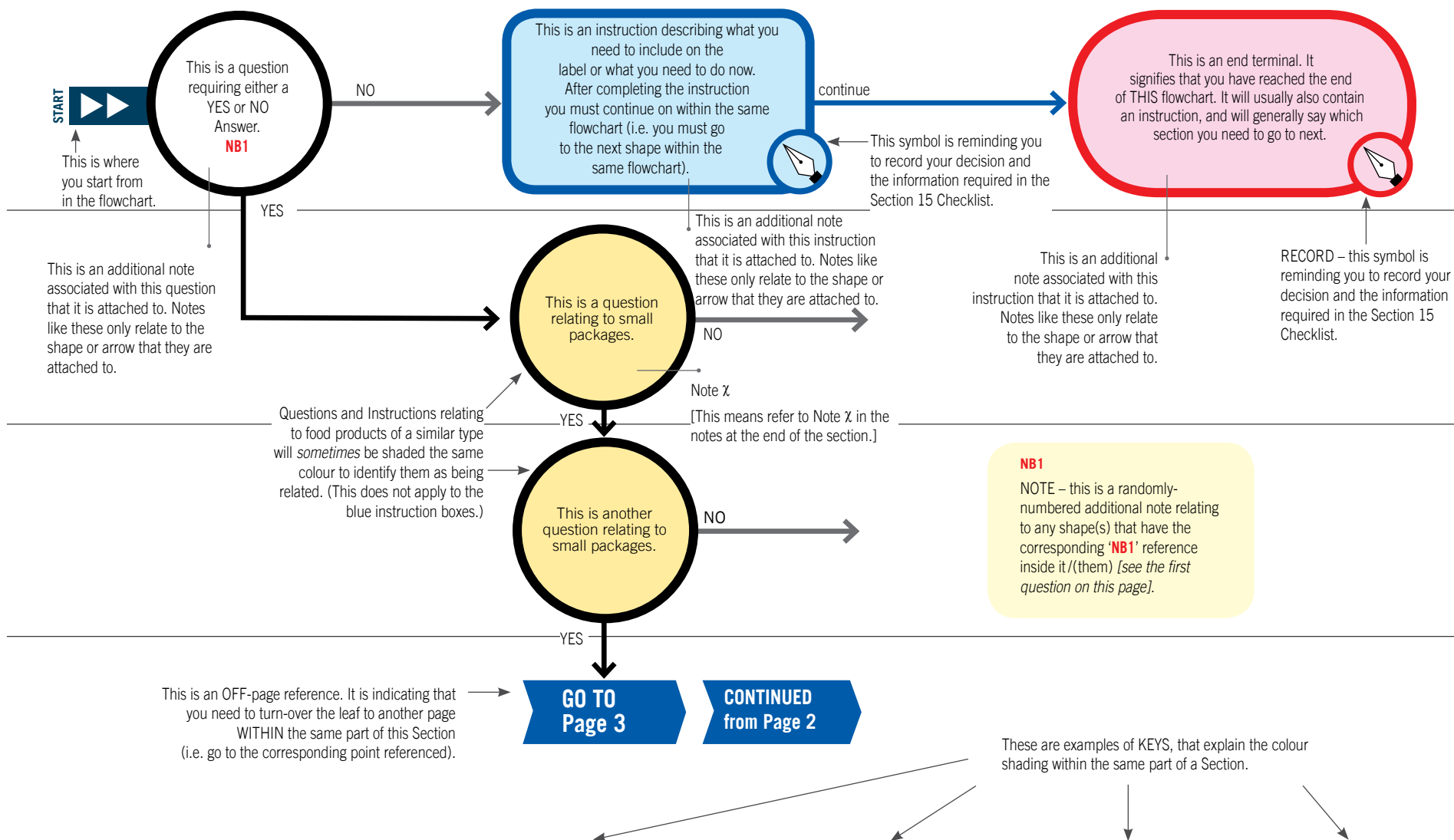
- 'Food Labelling, Promotion and Marketing' January 2000 guide for manufacturers, importers and retailers on the Fair Trading Act (at the time of printing this Labelling Guide the document was under review and is likely to be updated).
  - 'Place of Origin' March 1999 guide for importers, manufacturers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

Environmental Protection Authority (New Zealand EPA)

Ph: 04 916 2426

[www.epa.govt.nz](http://www.epa.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
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