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CITY OF GREATER GEELONG

HEALTH SERVICES

FOOD LABELLING

FOR

FOOD BUSINESSES

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Why do I need to label my food?

Food labels can provide a wide range of information to help consumers make food choices.

Food labels also help to protect public health and safety by displaying information such as dates, ingredients, certain allergens, instructions for storage, preparation as well as advisory and warning statements.

In Australia, food businesses must ensure that food labels conform to the national Food Standards Code Australia and New Zealand (FSANZ).

Other laws also apply:

- Australian Consumer Law,
- National Trade Measurement Regulations 2009 and
- Commerce (Trade Descriptions) Act.

Everything said about food on the label is subject to Australian Consumer Law, which prohibits false, misleading or deceptive representations.

All food labels must contain the following information:

- Name and/or description of the food
- Identification of the 'Batch' number (food recall information)
- Name and Australian street address of the supplier of food (food recall information)
- List of ingredients
- Date mark
- Nutrition Information Panel (NIP)
- Country of origin of the food
- Warning and advisory statements.

Under the Food Act it is an offence not to meet labelling requirements. Failure to do so can lead to Council issuing fines or taking legal action.

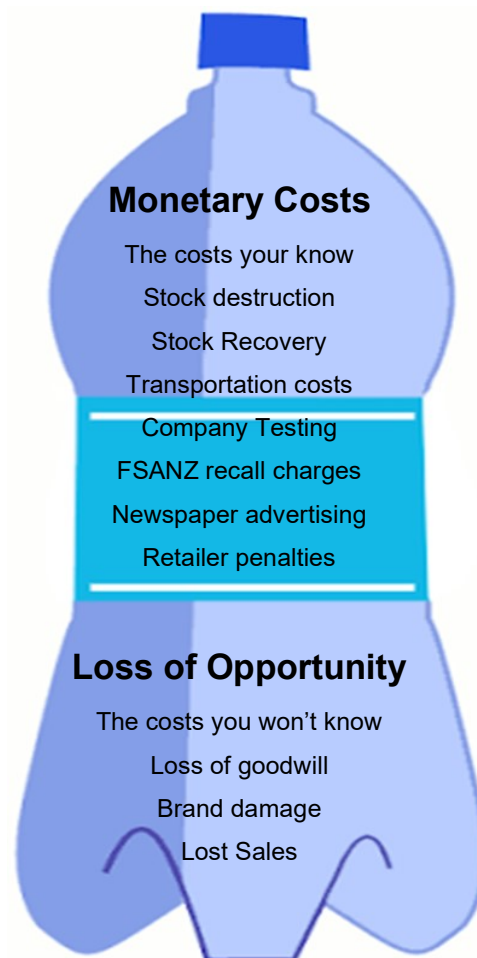
Why do I need to label my food (cont)?

In 2015 there was a Consumer Label Survey conducted, some of the highlights of the report were:

- 67% of Australians somewhat agree or strongly agree that they trust food labels – this means **33% of consumers that don't trust food labelling**,
- Approximately 75% are interested in the ingredients list, nutritional panel and health claims – especially with first time purchases.

The full report can be found at [Consumer Label Survey 2015](#).

The true cost of labelling recalls to businesses



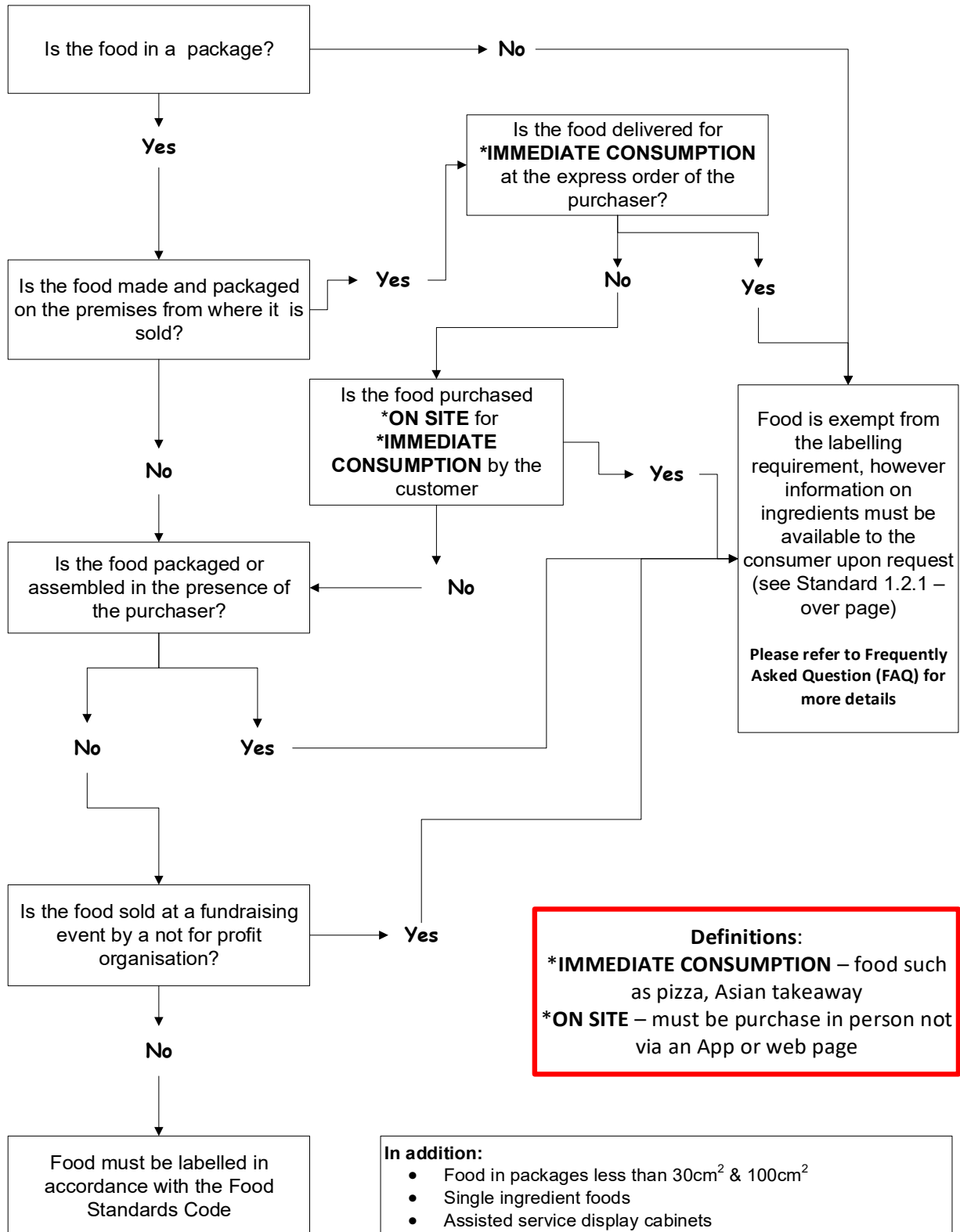
In 2020 - 49% of food recalls by Food Standards Australia were due to incorrect labelling.

Of those recalls, 96% were due to incorrect mandatory/warning declarations or advisory statements.

Food Recalls are an expensive and time-consuming process which can impact any business.

Do I need to label my food?

Detailed information can be located at the [Food Standards Australia and New Zealand \(FSANZ\) website](https://www.foodstandards.gov.au/).



Definitions:
 *IMMEDIATE CONSUMPTION – food such as pizza, Asian takeaway
 *ON SITE – must be purchase in person not via an App or web page

In addition:

- Food in packages less than 30cm² & 100cm²
- Single ingredient foods
- Assisted service display cabinets

are exempt from **some** labelling requirement but certain information **must** be available to the customer.

Please contact the Environmental Health Unit at Council, on 5272 4411 if you have any questions.

Detailed Information for Labelling

Work through the information over the next few pages to assist you in producing a compliant label.

A checklist summary with just the headings can be used with each product that requires labels. You can use this checklist to tick off each aspect of the labelling to ensure you have complied with all the requirements. (Appendix 1)

We recommend that labelling is submitted to a laboratory that specialises in food analysis and label production for approval. (Appendix 7)

<p>Standard 1.2.1</p>	<p>Exempt from labelling</p>
	<p>Exempt from labelling due to:</p> <ul style="list-style-type: none"> • Food is made and packaged on the premises from which it is sold • Food is packaged in the presence of the purchaser • Food is packaged and displayed in an assisted service display cabinet* <p>NOTE: can you be sure this is how it will always be sold in all outlets?</p> <ul style="list-style-type: none"> • Is delivered packaged and ready for immediate consumption at the express order of the purchaser; eg: pizza and take away meals <p>Even though product may be exempt, information on ingredients must be available to the consumer on request, therefore it is good practice to ensure that a list of all ingredients and allergens are provided to your customers to refer to.</p> <p>Please refer to (Frequently Asked Questions) FAQ for more details</p> <p>* Standard 1.2.1 defines an assisted service display cabinet as an enclosed or semi-enclosed display cabinet which requires a person to serve the food as requested by the purchaser.</p>
<p>1.2.2</p>	<p>Food Identification Requirements – Name of Product/Batch/Contact details</p>
	<p>Name of the product - Food must be labelled with an accurate description that indicates the true nature of the food, e.g. 'Strawberry Yoghurt' should contain strawberries. If the yoghurt contained strawberry flavouring rather than real strawberries the label should indicate it is 'Strawberry Flavoured Yoghurt'</p> <div data-bbox="1036 1318 1430 1587" data-label="Image"> </div> <div data-bbox="375 1570 889 1686" data-label="Image"> </div> <div data-bbox="914 1650 1276 1713" data-label="Text"> <p>Lot/Batch Identification -(Date marking may suffice)</p> </div> <div data-bbox="383 1738 867 1944" data-label="Image"> </div> <div data-bbox="889 1776 1373 1902" data-label="Text"> <p>Name and address of packer, manufacturer, vendor or importer (PO Box Number/Email/Facebook are NOT sufficient).</p> </div>

Standard
[1.2.3](#)

Mandatory Warning & Advisory Statements & Declarations

These must be at least 3mm in size

There are various ingredients that require a **warning** statement on the label. For example: Royal Jelly, bee pollen, quinine, infant food & formula, kava, guarana or extracts of guarana etc

Please refer to [Food Standards Code](#) to check if any of your ingredients fall into these categories and the specific wording that must be used.

Mandatory advisory statements

Certain food groups fall into this category such as foods that may have a laxative effect, GM Foods, formulated caffeinated beverages, formulated meal replacement etc...

Please refer to [Food Standards Code](#) to check if any of your ingredients fall into this category; there are examples of wording that can be used

Mandatory Declarations:

A declaration is required where the food contains:

- Wheat / gluten,
- peanuts,
- fish,
- shellfish/crustacea,
- mollusc
- milk,
- tree nuts and products,
- soy,
- sulphites,
- lupin,
- egg,
- sesame seeds
- Cereals containing Gluten – you must declare gluten as a separate declaration from the following cereals - wheat, barley, rye, oats, malt, brewer's yeast, wheaten corn flour, oatmeal, semolina, cous cous and spelt.
- If the gluten is from wheat, then “wheat” must be declared as well as “gluten”
- If gluten is present from the oats then you need only declare gluten in the mandatory declaration, but in the ingredients list it must be “oats (gluten)”

Wheat/gluten Examples:

Ingredients
barley, water, sugar, capsicum
Contains: gluten

Ingredients
wheat flour, water, sugar, capsicum
Contains: wheat, gluten

Ingredients
spelt (**wheat**), water, sugar,
tomato
Contains: wheat, gluten

Ingredients
oats, water, sugar, capsicum
Contains: gluten

Standard
[1.2.3](#)

Mandatory Warning & Advisory Statements & Declarations (continued)

Crustacea and their products – on label to appear as “crustacean”

Ingredients
prawns (crustacean), lemon, chilli
Contains: crustacean

Ingredients
egg yolk, sugar, flavouring
Contains: egg

Egg and egg products - on label to appear as “egg”

Fish and fish products - on label to appear as “fish”

Ingredients
hoki (fish), lemon, onion, chilli
Contains: fish

Mollusc – must be identified separately as “mollusc”

Ingredients
oysters (mollusc), bacon, chilli
Contains: mollusc

Milk and milk products are from all animals that produce milk eg: cows, goats, sheep, camel - on label it must appear as “milk”

Ingredients
Milk solids(milk), onion, carrot
Contains: milk

Ingredients
Goat milk, sugar, tomato
Contains: milk

Ingredients
Peanut oil, chilli, onion, tomato
Contains: peanut

Peanut & Peanut products:

Ingredients
coconut, pecans, almonds
Contains: pecan, almond

Tree Nuts & products

There are 9 tree nuts that require declaring; (almonds, Brazil nuts, cashews, hazelnuts, macadamias, pecans, pine nuts, pistachios and walnuts) all must be individually named you cannot write ‘tree nuts’ in the ingredient list or mandatory declaration

Ingredients
sesame oil, onion, tomato, chilli
Contains: sesame

Sesame Seeds and their products

Soy/Soya/Soybean and their products - on label to appear as “soy”

Ingredients
soybeans
Contains: soy

Ingredients
lupin flour
Contains: lupin

Lupin.

Standard
[1.2.3](#)
CONT

Mandatory Warning & Advisory Statements & Declarations (continued)

Sulphites are **naturally occurring minerals** that have a long history of use in foods.

They naturally occur in some foods but are widely used as a food additive to prevent microbial spoilage and preserve colour. Cordials, dried fruit, sausages and wine are some of the foods that commonly contain sulphites.

The following are the numbers/names associated with sulphites

- 220 sulphur dioxide
- 221 sodium sulphite
- 222 sodium bisulphite
- 223 sodium metabisulphite
- 224 potassium metabisulphite
- 225 potassium sulphite
- 226 calcium sulphite
- 227 calcium bisulphite
- 228 potassium bisulphite

Sulphite where present in food at concentration of 10mg/kg or more must be declared as an allergen

Examples of Sulphite declarations –

Ingredients
Dried Apricot, Preservative (220)
(sulphites)
Contains: sulphites

Ingredients
Preservative (sodium metabisulphite)
(sulphites) Contains: sulphites

Ingredients
Desiccated Coconut (Coconut,
Colour Stabiliser (223) (sulphites))
Contains: sulphites

Sulphites need to be listed in the ingredients list regardless of quantity present, this includes if it is part of a

compound ingredient or processing aid (e.g. in wine), but do not need to be declared as an allergen if less than 10mg/kg

Example label where sulphite **does not** need to be declared as an allergen

Ingredients
Sugar, vegetable oil, water, sugar syrup, salt,
preservative (221) thickener, flavours, colours

Does not need to be in bold just listed as an ingredient

Mandatory Warning & Advisory Statements & Declarations (continued)

Mandatory Declarations including the New Plain English Allergen Labelling example

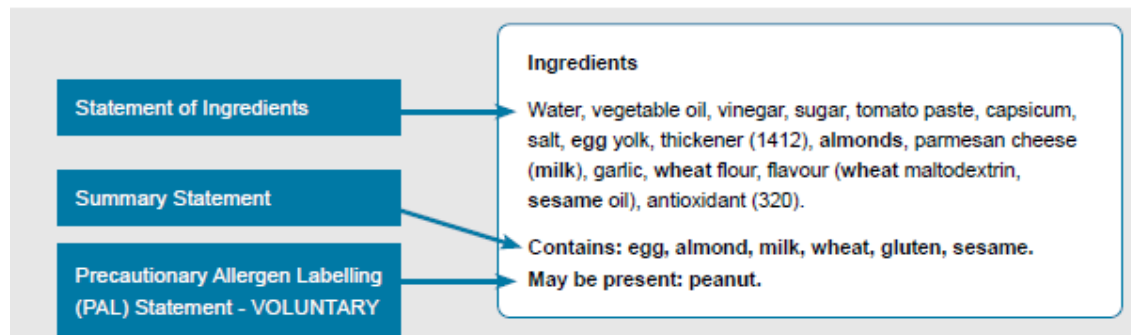
Allergens in bold in the ingredients list.

Separate allergen declaration in bold.

Optional precautionary allergen warning



Further example:



From 25 February 2024 allergens must be declared in 2 places on food labels:

- In the ingredients list:
 - Highlighted in bold print, and
 - The type of flour/nut specified
- And
- In a distinctly separate summary statement starting with the word – Contains. This must be able to be viewed in the same area as the ingredients listing. That is, below or to the side of the ingredients list.

Standard
[1.2.3](#)
CONT

Mandatory Warning & Advisory Statements & Declarations (continued)

Ingredient lists, allergens and summary statements must be the same font and in bold print. The font for these must be no smaller than any other print on the label.

Example:

Contains: egg, almond, soy, wheat, gluten & sesame (must specify the type of flour)

See Appendix 2 for further examples of how to declare in mandatory declarations and ingredients lists.

If you have used the [VITAL tool](#) to assess possible contamination use may be present, otherwise use may contain.

Advisory Statements (e.g. May contain...

This statement is used when there is a possibility that the product may have been contaminated with one of the declared allergens (as above) but you are not claiming it is ...free of the specified allergens.

Advisory Statements and Declarations

There are various ingredients that require an advisory statement on the label. For example: Royal Jelly, bee pollen, quinine, guarana or extracts of guarana etc.

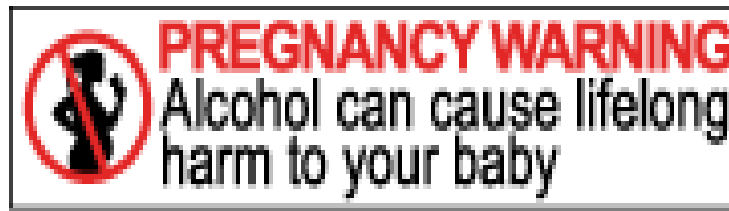
Please refer to [Food Standards Code](#) to check if any of your ingredients fall into these categories. These allergens **must** be declared in the ingredients list.

Mandatory Pregnancy Warning for Alcohol

Businesses have three (3) years from 31 July 2020 to implement these requirements.

Further information is available on the Food Standards Website, including:

- Design elements of the label and downloadable labels
- Further Q & A on Code requirements for pregnancy warnings label



Example of Wine labelling is at Appendix 5 – More information is available at [Wine Australia](#).

Standard
[1.2.4](#)

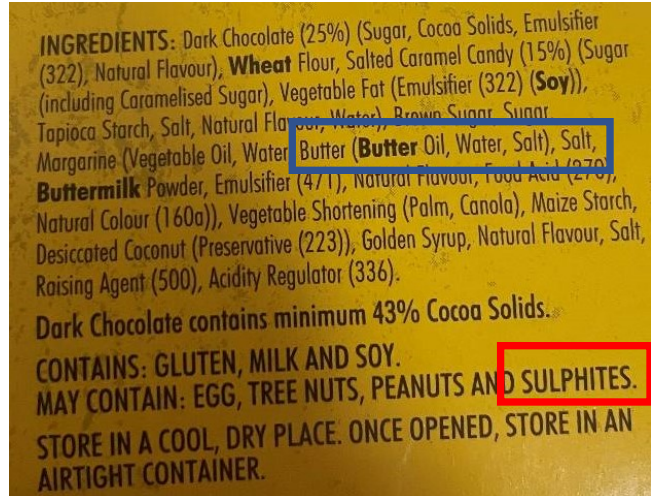
Statement of ingredients

- All labels must include a list of ingredients
- This list must be in order of weight of product going into the food (highest to lowest)

All ingredients listed in order of Weight

Compound Ingredients broken down into individual ingredients

Declaration of additives



- Common name or name that describes the true nature of ingredient to be used (Not a trade name e.g. Milo).

Compound Ingredients

- Where the compound ingredient (a food with more than one ingredient in it) is over 5% of the total product then all ingredients to be declared e.g. Chocolate (Milk Powder, cocoa, Emulsifier (475))
- Where the compound ingredient is less than 5% of the total product only the additives need to be declared.

Declaration of Additives

- Declare in the format “Class name” & name or number following e.g. Preservative (200) or Preservative (Sorbic Acid).

<p>Standard 1.2.5</p>	<p>Date Marking</p>
	<p>Date Marking is required if shelf life is under 2 years</p> <ul style="list-style-type: none"> • Best Before Best Before is generally used for shelf stable products that require no refrigeration/heating prior to being sold. Format for less than 3 months – day, month and year Format for more than 3 months – month and year For foods when the best before is more than 2 years – no date marking is required. • Use By Use by is generally used for products that require refrigeration/heating prior to being sold. Food must not be sold past its Use By for health and safety reasons – lab testing may be required to ascertain this date. • Produced /Made on This is only applicable to bread products that have a shelf life of less than 7 days.
<p>Standard 1.2.6</p>	<p>Directions for Use and Storage</p>
	<p>Required for products that require date marking</p> <ul style="list-style-type: none"> • Include directions for use and/or storage where necessary for reasons of health or safety. <p>Examples of directions: Keep refrigerated below 5 degrees Once opened keep refrigerated and consume within 3 days Cooking/reheating information Once open store in airtight container</p>
<p>Standard 1.2.7</p>	<p>Gluten and Allergen Claims</p>
	<p>A claim to the effect that a food is Gluten Free must not be made in relation to a food unless the food contains NO DETECTABLE GLUTEN.</p> <p>A claim to the effect that a food has a Low Gluten content must not be made unless the food contain no more than 20mg gluten per 100g of the food</p> <p>If claiming gluten free or low gluten then the amount of gluten needs to be included in the Nutritional Ingredients Panel (NIP) refer to section 1.2.8 and Appendix 3</p> <p>If making allergen claims e.g. dairy free, nut free etc. we recommend that this is confirmed by testing.</p> <p>You cannot claim it is nut free, dairy free, gluten free etc.... and then say for example 'Made in a facility or on equipment that also uses...' This can cause confusion – the product is either free of the allergen or you cannot make the claim on your label.</p>

<p>Standard 1.2.8</p>	<p>Nutrition, Health and Related Claims</p>
	<p>Health Claims refer to the relationship between a food and its health benefits. They are only permitted on foods that meet the Nutrient Profiling Scoring Criteria (NPSC)</p> <p>Nutrition Claims are claims about the content of certain nutrients or substances in food such as 'low in fat'</p> <p>This is a complex area and notification to FSANZ may be required and/or would require registering with the appropriate board.</p> <p>We strongly recommend that you read:</p> <ul style="list-style-type: none"> • FSANZ Nutrition, health and related claims Standard 1.2.7 and Standard 1.2.8 • FSANZ Truth in Labelling • Therapeutic Good Administration Labelling and Packaging <p>The label on a package of food must include a nutrition information panel unless specifically exempt see Page 15 for these exemptions. See next page for an example of a NIP.</p> <p>Where a nutrition claim is made in relation to the food a NIP must be included on the label of a packaged food regardless if exempt from labelling.</p> <p>A NIP must include the following particulars and be set out in the following format unless otherwise prescribed in the Food Standards Code – ensure you use the Australian version.</p>
<p>Standard 1.2.8</p>	<p>Basic claims and what they mean</p>
	<ul style="list-style-type: none"> • Reduced fat: the reduced fat version of a food must not contain more than 75% of the total fat content of the regular product. • Low fat: the food must contain 3g or less of total fat per 100g of the food, or 1.5g total fat per 100ml of liquid food. • Fat free: the food must contain 0.15g or less of total fat per 100g. • Reduced in saturated fat: the food must contain 75% or less of the saturated fat content of the regular food product. • Cholesterol free: the food must contain no more than 3mg of cholesterol per 100ml of the food. • Low in sugar: the food must contain no more than 5g of total sugars per 100g of the food, or no more than 2.5g of total sugars per 100g of liquid food. • High in fibre: the food must contain at least 3g of dietary fibre per serve. • Low in salt: the food must contain no more than 120mg of sodium per 100g of the food. • Reduced salt: the food must not contain more than 75% of the sodium content of the regular food product.

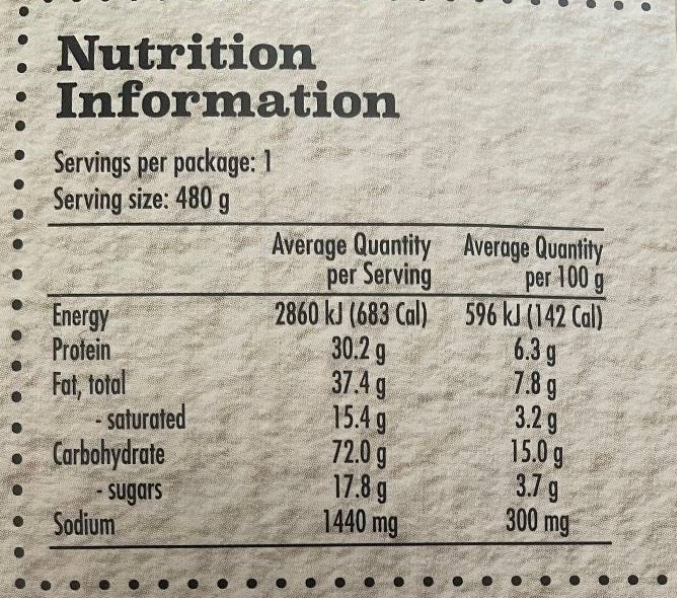
Standard
[1.2.8](#)

Nutritional Information Panel (NIP)

Where a nutrition claim is made in relation to the food a NIP must be included on the label of a packaged food regardless if exempt from labelling.

Example of a NIP:

A NIP must include the following particulars and be set out in the following format unless otherwise prescribed in the Food Standards Code – ensure you use the Australian version.



	Average Quantity per Serving	Average Quantity per 100 g
Energy	2860 kJ (683 Cal)	596 kJ (142 Cal)
Protein	30.2 g	6.3 g
Fat, total	37.4 g	7.8 g
- saturated	15.4 g	3.2 g
Carbohydrate	72.0 g	15.0 g
- sugars	17.8 g	3.7 g
Sodium	1440 mg	300 mg

Refer to the Food Standards Code 1.2.8 for other specific details in relation to nutritional panels.

The nutritional information can be determined from several sources

- [Nutrition Panel Calculator](#) (NPC)
- Food composition tables/data bases
- Laboratory analysis
- Other software.

If claiming Gluten Free or low gluten then the amount of Gluten needs to be included in the NIP, this can be located below the protein information or at the bottom of the NIP. See examples in Appendix 3.

Note: The NPC has limitations when the preparation of your food involves **boiling** or **frying**, especially where the water or oil is not completely absorbed by the food. The NPC also has limitations when the preparation of your food involves **baking** with yeast (fermentation), **fermentation** (with other bacteria e.g. yoghurt) and other certain processes.

In these circumstances we would recommend that you contact a laboratory that specialises in food analysis and label production.

Exemptions – **excludes the nutritional information panel only** – still to comply with all other labelling requirements

- Small Packaging (less than 100cm² surface area)
- Sandwiches, wraps etc.
- Herbs and spices
- Instant Coffee.

Standard	Legibility Requirements
Summary – covered in various Standards	<p>The information contained in the label must be:-</p> <ul style="list-style-type: none"> • Legible – easy to read • prominent • in English • Mandatory Warning/Advisory statements/declarations must be in a size type not less than 3mm or not less than 1.5mm for small packages (under 30cm squared).
1.2.10	<h3>Characterising Ingredients and Components</h3>
	<p>Percentage of the characterising ingredient to be detailed in the ingredient listing e.g. Blueberry Muffins The characterising ingredient is Blueberry So the ingredients list would be: wheat flour, sugar, butter, eggs, blueberries (8%).</p> <div data-bbox="388 852 841 1199" data-label="Image"> </div> <p style="color: red; text-align: right;">Characterising Ingredients</p> <p>% of ingredient shown in ingredients list</p> <div data-bbox="558 1304 1252 1881" data-label="Image"> </div>

Standard	Country of Origin requirement
Previously 1.2.11 Now governed by Australian Consumer Law	<p>Current businesses moving towards using the kangaroo logo must include the following information in the interim:</p> <ul style="list-style-type: none"> • Packaged food must state the country where the food was made or processed. • If the product is made in Australia and some of the ingredients are imported then a statement that the food is made of local and imported ingredients must be included <p>This labelling is applicable for products made up to and including 30th June 2018, any product made on or after 1st July 2018 must adhere to the new Country of Origin Requirements on next page.</p> <p>Refer to the separate information on Country of Origin requirements</p>
Standard	Weight of packaged Food
Not regulated by the Food Standards Code but by National Trade Measurement Regulations 2009	<ul style="list-style-type: none"> • A statement of content of weight (or volume, if liquid) must be contained with the label attached to the package in accordance with Trade Measurement requirements • Metric units to be used • Must be on the main display face on a plain background with a 2mm clearance around it • For further information refer to the trade measurement information on the National Measurement Institute Website. <p>Remember this is for the weight of the food not including the packaging (net weight).</p>
Standard	Health Star Rating
Not regulated by the Food Standards Code	<p>This is optional</p> <p>For further information on this refer the Health Star Rating website.</p>

Country of Origin Labelling (CoOL) Requirements

Why the change?

The changes aim to make it clear to consumers where food is actually produced instead of reflecting the location where it is ultimately packaged.

What next?

- Assess if a **priority** or **non priority food**, then follow the flow chart on Page 19 for compliance.
- We recommend that the [Country of Origin Labelling \(CoOL\) online tool](#) is used.
- We recommend that you download the Country of Origin Food Labelling Style Guide and watch the video which is available [on this link](#).

Non Priority Food	Priority Food
<ul style="list-style-type: none">a) seasonings;b) confectionery;c) biscuits and snack food - does not include cakes, muesli barsd) bottled water;e) soft drinks and sports drinks;f) tea and coffee;g) alcoholic beverages. <p>For further definition of these foods refer to Federal Register of Legislation Country of Origin Food Labelling Information Standard 2016</p>	All other food and drinks not on the non priority food list

When a Country of Origin Label is not required

The new Information Standard covers all food for retail sale in Australia.

According to the new Information Standard you will not need a standard mark OR a country of origin statement for the following food product types:

- foods sold in restaurants, cafes, take-away shops or schools
- foods sold at fund-raisers
- foods sold in the same premises in which they have been made and packed (for example: a bakery that sell their food products exclusively at the shop-front of the facilities where the products were made and packed).

Am I required to keep any records about the claims I make?

Yes. If you make a country of origin claim you should be able to substantiate it.

The Standard requires that businesses keep records supporting a country of origin claim for 12 months after the sale of the food item.

This obligation does not apply to an unpackaged single ingredient food from a single country (e.g. fish or cuts of meat).

Records could include information regarding:

- the proportion of Australian ingredients
- traceability information
- contact details of who you received food products from or who products were supplied to
- dates of transactions
- batch or lot identification
- volume or quantity of products and
- relevant production records.

You will be required to provide this information to the ACCC or another Australian Consumer Law regulator upon request.

For more information refer to the [ACCC website](#)

Examples of Country of Origin Labels

The percentages can be altered to suit your product as you use the [Online Label Tool](#)

By following the questions it will generate the label you require and this can then be reproduced in colour or mono/landscape or portrait for your product.

Product made in another country,
then repacked in Australia



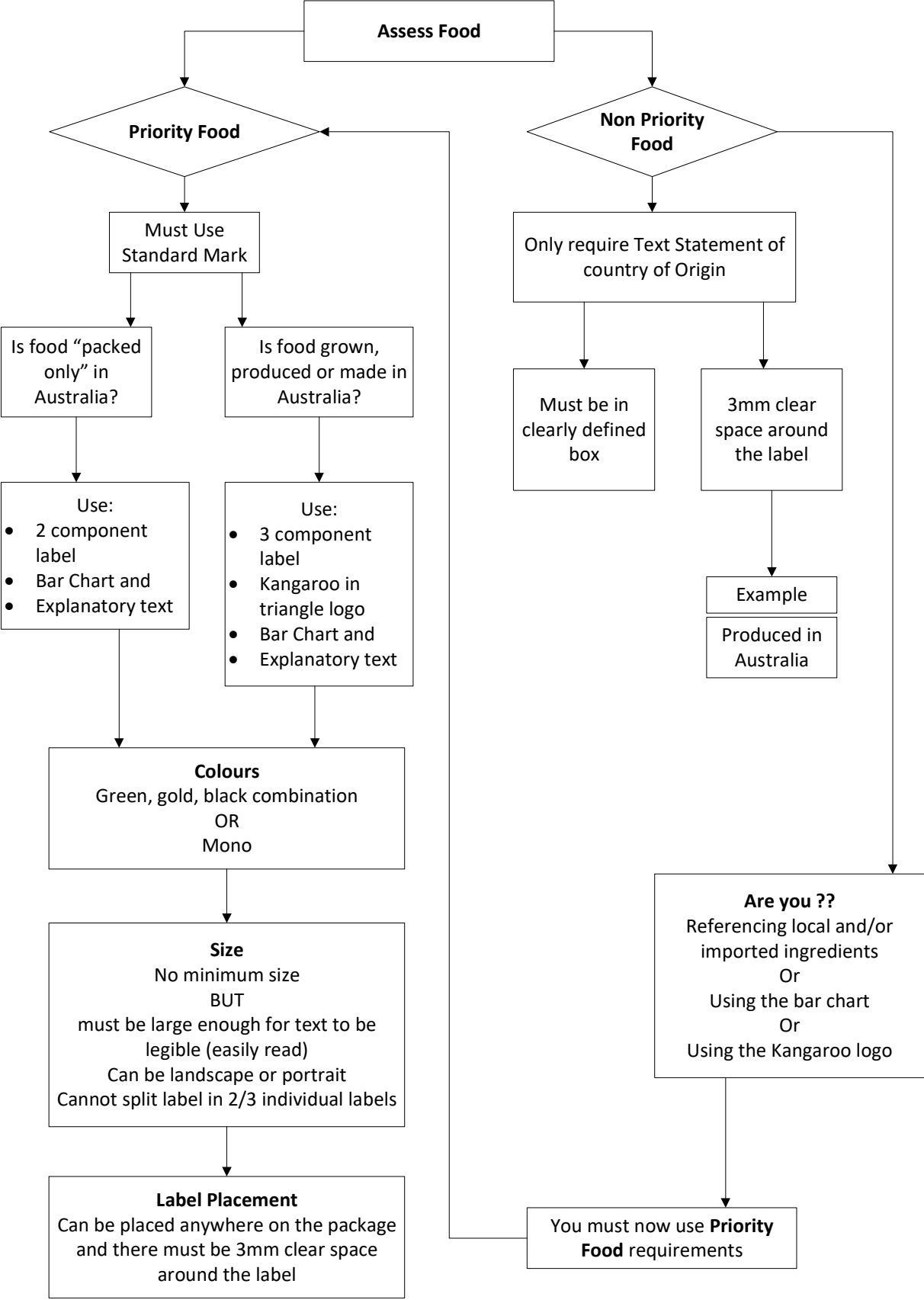
Made and produced in Australia
with all Australian ingredients

Where you are using a mix of Australian and overseas ingredients
but the amount of Australian ingredients is constant –
e.g: sugar/tomatoes are constantly Australian not sometimes
overseas sugar/tomatoes – if you have to substitute due to
seasonal variances then you will need to use **the last label
shown**



Where ingredients origin may vary
due to seasonal variances
or other influencing factors

Country of Origin Labelling (CoOL) – flow chart



Where can I get more information?

Environmental Health Unit at City of Greater Geelong

on ☎ (03) 5272 4411

or via email at contactus@geelongcity.vic.gov.au

References & Further Information

- [FSANZ](#)
- Food Act 1984
- [Food Safety Victoria](#)
- [NSW food authority – labelling](#)
- [Australian National Measure Institute](#)
- [Australian Competition and Consumer Commission \(ACCC\)](#)
- [Dairy Technical Services Food Laboratory \(DTS\)](#)
- [Food Labels what do they mean poster](#)
- [A guide to complying with the Nutrition, Health and Related Claims Standard of the Australia New Zealand Food Standards Code.](#)
- [ACCC - Country of Origin information](#)
- [Business Victoria – Country of Origin Information](#)

Helpful Hints

- Have a look at a similar product in the supermarket – choose the main brands to see how the label includes the information and the format of the label
- It is essential that all food labels be rechecked regularly since the composition may change.

Frequently asked questions (FAQ)

Do I need a label– the ingredients are available on my website / online?

All packaged food must bear the label unless exempt under the Food Standards Code [1.2.1-6](#)

I make items in one of my cafes and sell at other cafes I own; do I need to label as I make the product?

Yes, if the product is for retail sale then it must be labelled when sold from a place it is not made at. If you are for example making a sauce that is packaged but used in cooking at one of your other cafes – this does not require full labelling – will still require storage information including use by / best before dates and allergens, and the site must have access to the ingredients list.

I make packaged meals where the people order directly from me and either pick them up or I deliver them. Do I need to label the meals?

Yes, if the food is not for immediate consumption (e.g. pizzas, takeaway Chinese etc.) it will require full labelling. Even if your ingredients and other information are available on the ordering page you are still required to label the product.

Do I need to do individual Nutritional Information Panels (NIP) for each of the items?

No, the NIP needs to reflect the average of the package - please call us to discuss this further. Remember a full list of ingredients and allergens is required for all the items in the pack.

I repackage foods to sell in my store (e.g. yoghurts, slices, lollies). I have brought them from someone else, do I need to label as I package them on site?

Yes, you need to comply with full labelling as they were made somewhere else. Your supplier should provide ingredient lists and NIPs for their product. Under the Food Standards Code, a purchaser can request from the supplier the information needed to comply with labelling requirements.

I run my food business from home and only produce small amounts., Do I need to do all the aspects of labelling, as surely it is only for large businesses, given how complicated it is?

Yes, all food businesses, whether small or large, must to comply with the regulations.

How do I work out my best before or use by date?

We recommend that labelling is submitted to a laboratory that specialises in food analysis and shelf life testing. (Appendix 7)

Making a guess on your food expiry dates using similar dates to products found in a supermarket is not a good idea; as the quality of their materials and production processes may differ substantially from yours. In order to arrive at an accurate food expiry date, it is essential to analyse your production process from your raw materials, manufacturing steps and storage of materials during the process.

Do I need to declare alcohol in food or drinks?

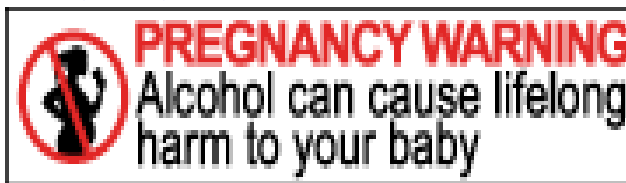
If alcohol is added to your food, you need to include a statement of the alcohol content where food (including an alcoholic beverage) contains more than 1.15% alcohol by volume

What are the labelling requirements for alcohol?

If you require further information around alcohol content and labelling, please refer to Food Standards 2.7.1

Please note as well as a Food Act Registration you may be required to hold a liquor license as well. For more information contact the www.vcglr.vic.gov.au

Pregnancy Warnings to be included on alcohol



Frequently asked questions - continued

I make hampers/grazing Boxes – do I need to label these?

Yes, hampers / grazing boxes have specific labelling requirements which are complex, please call us to discuss further.



The following are guidelines for hampers/grazing boxes

- Name and address of the business must be on the hamper / grazing box
- Storage & use by dates must be on the pre-packaged food, if the hamper is for sale in a retail environment requirement to put the earliest use by/ best before date on the outer wrapping.
- Pre-packaged items purchased from another supplier require full labelling
- Items that are packaged by yourself and may not be for immediate consumption to comply with full labelling

Additional guidelines for grazing boxes

Items that are presented in the grazing box with the intention of immediate consumption and at the express order of the purchaser do not require full labelling, however the following information should be supplied with the grazing box –

- Allergen declaration – Contains: XXXXX. May Contain: XXXXX
- Specific Storage Requirements.
- A full list of ingredients should be available to the customer on request for any of the unpackaged items/packaged items for immediate consumption.
- There are other items that need to be declared for unpackaged foods in hampers such as fermented meats, foods containing kava, irradiated items / gene technology – we will discuss with you if required



Remember to ensure the customer has ample opportunity to advise of allergies prior to purchase.

What if I need to recall my product, how do I do this?

The FSANZ has useful information on the [Food Industry Recall Protocol](#) including a [Food Recall Plan Template](#).

Food recalls do not just affect large businesses but also small businesses – you may have missed declaring an allergen on your product, or used an ingredient that is subject to recall, there are numerous reasons for food recalls and you need to be prepared for this.

Frequently asked questions - continued

I make a product that requires additional foods added to it prior to consuming (like a cake mix). How do I show this in the labelling?

Your ingredient list is to show only ingredients that are in the package.

In the Nutritional Information Panel (NIP)

- If the additional ingredient is water for dehydrated/concentrated food, then the water as an ingredient needs to be included when calculating the NIP
- If the product can be eaten directly without the additional ingredients being added – e.g. milk for cereal then you can have the standard NIP for the ingredients and you can add an extra column if you wish showing the product with an added ingredient – need to state what the added ingredient is for this column e.g. when served with 125ml skimmed milk
- If the product requires additional ingredients adding prior to being consumed for example butter, egg, milk etc. the NIP needs to reflect the finished product as it would be eaten – for example the NIP would have an addition phrase such as ‘when prepared according to directions using whole milk and polyunsaturated margarine’, ‘when prepared as directed using vegetable oil and full cream milk’

I sell some of my food that I make on site in packages from the fridges & shelves in store, that is not for immediate consumption. For example - main meals, biscuits, jams etc. Do I need to label?

The simple answer is no it does not need to be fully labelled, but there are some requirements

Labelling information must be on display where the food is being sold **or** on the food container

- the name of the food
- mandatory declaration (e.g. the presence of allergens)
- directions for use and storage (e.g. keep refrigerated, heat to piping hot, consume within 3 days of purchase)
- [advisory or warning statements or declarations](#) (e.g. royal jelly, infant formula products, supplementary sports foods, caffeine, bee pollen)
- Health claims if made

Labelling information must be available if the customer requests, this can be provided verbally, in writing upon request, or provided to the purchaser in some other way

- Full list of ingredients, including compound ingredients
- nutrition information panel (NIP)
- characterising ingredients %
- Country of Origin

Talk to us if your food is, or contains:

- irradiated food
- genetically modified food
- fermented/manufactured meat
- kava root
- raw egg
- other items listed in the [Food Standards Code 1.2.1-9](#)

Remember

Food labels are an important source of information for your customers, including what is in the food they buy, where it has come from, and how best to store it.

Appendix 1 - Checklist summary

You can use this checklist for each product that requires labelling and tick off each part to ensure you have complied with all the requirements

Product Name		Date
Standard	Description of what required	Completed/ Not required
1.2.1	Exempt from labelling <i>You will still need to produce an accurate list of ingredients including the compound ingredients breakdown for your products for your customers and allergens warnings on request</i>	<input type="checkbox"/>
1.2.2	Food Identification Requirements	<input type="checkbox"/>
1.2.3	Mandatory Warning & Advisory Statements & Declarations	<input type="checkbox"/>
1.2.4	Statement of ingredients	<input type="checkbox"/>
1.2.5	Date Marking	<input type="checkbox"/>
1.2.6	Directions for Use and Storage	<input type="checkbox"/>
1.2.7	Nutrition, Health and related claims	<input type="checkbox"/>
1.2.8	Nutritional Information Panel (NIP)	<input type="checkbox"/>
Summary	Legibility Requirements	<input type="checkbox"/>
1.2.10	Characterising Ingredients and Components	<input type="checkbox"/>
1.2.11	Country of Origin requirement	<input type="checkbox"/>
National Trade Measurement Regulations 2009	Weight of packaged Food	<input type="checkbox"/>
Optional	Health Star Rating	<input type="checkbox"/>

Appendix 2 – Examples of ingredient lists, mandatory allergen declaration and precautionary advisory allergen

It is recommended

- that all ingredients are in lower case
- May be present is used when the VITAL assessment tool has been used for assessing the possible cross contact of ingredients
- May contain is used when the VITAL assessment tool has not been used
- A colon: is used at the end of the phrases – Contains, May be present and May contain

Some more examples of labels:

Ingredients
water, vegetable oil, vinegar, sugar,
tomato paste, capsicum, salt, **egg** yolk,
almonds, parmesan cheese (**milk**), garlic,
wheat flour
Contains: egg, almond, milk, wheat,
gluten
May be present: peanut

Ingredients
water, vegetable oil, vinegar, sugar, tomato
paste, capsicum, salt, **egg** yolk, **almonds**,
parmesan cheese (**milk**), garlic, **wheat** flour
Contains: egg, almond, milk, wheat, gluten
May contain: peanut

Ingredients
water, vegetable oil, vinegar, sugar, tomato paste,
capsicum, salt, **egg** yolk, **almonds**, parmesan cheese
(**milk**), garlic, **wheat** flour
Contains: egg, almond, milk, wheat, gluten
May contain: peanut, sesame, hazelnut,
macadamia, almond, cashews, pine nuts, walnuts

Ingredients
water, vegetable oil, vinegar, sugar, tomato
paste, capsicum, salt, **egg** yolk, **almonds**,
parmesan cheese (**milk**), garlic, **wheat** flour
Contains: egg, almond, milk, wheat, gluten
May contain: peanut, sesame, tree nuts

Appendix 3 - Samples of correct gluten free labelling in NIP


SERVING SIZE: 30g (2 biscuits) SERVINGS PER PACK: 12

	Per serve	Per 100g
Energy (kJ)	474	1580
(Cal)	113	378
Protein, Total (g)	3.7	12.3
Gluten (g)	Not detected	Not detected
Fat, Total (g)	1.1	3.6
Saturated Fat (g)	0.2	0.6
Trans Fat (g)	0.0	0.0
Polyunsaturated Fat (g)	0.5	1.6
Monounsaturated Fat (g)	0.4	1.4
Carbohydrate, Total (g)	20.9	69.7
Sugars (g)	0.7	2.2
Dietary Fibre (g)	2.0	6.8
Sodium (mg)	70	235

SERVING SIZE:30g (2 biscuits) SERVINGS PER PACK: 12

	Per serve	Per 100g
Energy (kJ)	474	1580
(Cal)	113	378
Protein, Total (g)	3.7	12.3
Fat, Total (g)	1.1	3.6
Saturated Fat (g)	0.2	0.6
Trans Fat (g)	0.0	0.0
Polyunsaturated Fat (g)	0.5	1.6
Monounsaturated Fat (g)	0.4	1.4
Carbohydrate, Total (g)	20.9	69.7
Sugars (g)	0.7	2.2
Gluten	0	0

Appendix 4 - Example of a complete label

Apple Slice Cake																																		
Ingredients Allergens must be displayed in bold print Type of tree nut must be specified	Flour (wheat) , Sugar, Eggs , Vegetable Oil, Full Cream Milk , Apples (8%) Chocolate (Milk Powder , Cocoa, Emulsifier (475)), Almonds																																	
	<table border="1"> <thead> <tr> <th colspan="3">NUTRITION INFORMATION</th> </tr> </thead> <tbody> <tr> <td>Servings per package:</td> <td colspan="2">4.00</td> </tr> <tr> <td>Serving size:</td> <td colspan="2">33.00 g</td> </tr> <tr> <td></td> <td>Average Quantity per Serving</td> <td>Average Quantity per 100 g</td> </tr> <tr> <td>Energy</td> <td>474 kJ</td> <td>1440 kJ</td> </tr> <tr> <td>Protein</td> <td>2.8 g</td> <td>8.6 g</td> </tr> <tr> <td>Fat, total</td> <td>3.1 g</td> <td>9.5 g</td> </tr> <tr> <td>- saturated</td> <td>1.6 g</td> <td>4.8 g</td> </tr> <tr> <td>Carbohydrate</td> <td>17.9 g</td> <td>54.4 g</td> </tr> <tr> <td>- sugars</td> <td>8.0 g</td> <td>24.2 g</td> </tr> <tr> <td>Sodium</td> <td>15 mg</td> <td>45 mg</td> </tr> </tbody> </table>	NUTRITION INFORMATION			Servings per package:	4.00		Serving size:	33.00 g			Average Quantity per Serving	Average Quantity per 100 g	Energy	474 kJ	1440 kJ	Protein	2.8 g	8.6 g	Fat, total	3.1 g	9.5 g	- saturated	1.6 g	4.8 g	Carbohydrate	17.9 g	54.4 g	- sugars	8.0 g	24.2 g	Sodium	15 mg	45 mg
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Carbohydrate	17.9 g	54.4 g																																
- sugars	8.0 g	24.2 g																																
Sodium	15 mg	45 mg																																
Total Weight	132g																																	
Contains This is required on all food labels with allergens by 25/2/2024, must be in bold and be printed in the same type face and size of type as the declarations in the statement of ingredients	milk, egg, wheat, gluten, almonds (must specify type of tree nut) May contain traces of peanuts and tree nuts (do not need to specify type of tree nut in <i>may contain statement</i>)																																	
Best Before	08.07.22																																	
Storage	Store in fridge below 5 degrees, once opened consume within 3 days																																	
Batch	080717																																	
Contact	City of Greater Geelong 100 Brougham Street Geelong 3220 Tel 5272 5272																																	
	 <p>Made in Australia - ingredient sources vary - average 80% Australian ingredients - Call 5272 5272 for details</p>																																	

Appendix 5 – Example of Wine Label

More information at Wine Australia

BRAND NAME
Optional. Brand names should not mislead as to the origin, age or identity of the wine.

COUNTRY OF ORIGIN
Mandatory for domestic stock. Wording is not defined, for example, 'Wine of Australia' or 'Product of Australia'.

NAME OF FOOD
Mandatory. Must convey the true nature of the food, e.g. 'wine' or 'Pinot Noir'.

ALCOHOL CONTENT
Mandatory. Must show percentage of alcohol by volume. Tolerances vary between products.

VOLUME
Mandatory. Must be 3.3mm in height. May be presented on the front or back label.

PREGNANCY WARNING
Mandatory from 31 July 2023. Approved image must be displayed within a black border on white background with clear space of 3mm. Size requirements apply.

GEOGRAPHICAL INDICATION
Optional. Must be 85% if claimed. Up to three GIs may be claimed and must total 95% (with min 5% from each GI) and be listed in descending order.

VARIETY
Optional. Must be 85% if claimed. Multiple variety claims must total 85% and be listed in descending order.

VINTAGE
Optional. The harvest year. Must be 85% if claimed. Multiple vintage claims must total 100%.

STANDARD DRINKS
Mandatory. Labels must declare number of standard drinks. 'Contains approx XX standard drinks' or logo acceptable.

LOT IDENTIFICATION
Mandatory, although the form is not prescribed.

ALLERGENS
Mandatory. Sulphites above 10 mg/kg and milk and egg must be declared. Format is not prescribed.

NAME AND ADDRESS
Mandatory. The name and street address of vendor, manufacturer, packer or importer.

Appendix 6 - Allergies and Intolerances

Education and Training for the food service industry

This is a growing area and all food manufacturers large and small, along with food service industry personnel need to be aware of the serious nature of allergens and intolerances.

The links below provide some useful information, along with the final link being to a newspaper article on a recent death due to incorrect labelling and lack of knowledge around ingredients in foods.

- [Allergen Bureau Website](#)
- [Australian Food and Grocery Council](#)
- [Coeliac Australia](#)
- [Food Allergy Training](#) – free online course to assist proprietors and staff to gain knowledge about food allergens and to develop best practice procedures for making their food business safe for customers with allergies
- [National Allergy Strategy](#)
- [Newspaper article in relation to food allergen deaths](#)
- [NSW Government – Be prepared, be allergy aware](#)

Appendix 7 - List of Laboratories offering labelling and/or shelf life testing services

Business Name	Web link	Address	Phone/email
ACS Laboratories	https://www.acslab.com.au/services/nutritional/	37 Stubbs St Kensington 3031	Phone: 03 9220 0115 Email: info@acslab.com.au
Agrifood Technology	https://www.agrifood.com.au/index.php/services/food-feed-nutrition	Werribee Laboratory 260 Princes Highway, Werribee, 3030	Phone: 1800 801 312 Email: lab.vic@agrifood.com.au
ALS - Environmental Services	https://www.alsglobal.com/industries/food/consulting-audit-and-training	16 Crown St, South Geelong 3220	Phone: 03 5246 9403
AML	http://www.amlaustralia.com.au/food-water-testing/	Entrance 3, Geelong University Hospital, Bellerine Street, Geelong, 3220	Phone: 1300 724 961
BVAQ	https://www.bvaq.com/	Head Office and National Chemistry Centre Units 3 and 8, 63-71 Boundary Rd North Melbourne 3051	Phone: 03 8371 7600 Email: sales.au@bvaq.com
Food Legal	https://foodlegal.com.au/	Level 6, 313 Latrobe Street, Melbourne 3000	Phone: 03 9606 0022
Nav Labs	http://navlabs.com.au/	4/6 Neville Avenue, Laverton 3028.	Phone: 03 9369 3313 Mob: 0411 717 838
OMIC Australia	http://omicaustralia.com.au/laboratory-services/food-chemistry/	302 Arden Street, North Melbourne 3051	Phone: 03 8327-1000 Email: info@omicaustralia.com.au
SGS Agriculture and Food Australia	https://www.sgs.com.au/en-gb/agriculture-food/food/nutrition-and-composition-analysis	10/585 Blackburn Road Notting Hill, 3168	Phone: 03 9574 3200
Symbio Labs	https://www.symbiolabs.com.au/category/food-and-nutrition/	Unit 36, 640 – 680 Geelong Rd, Brooklyn, 3012	Phone: 1300 703 166

Please note: Council in no way endorses the use of any particular laboratory and advise that each Business should conduct their own research into the lab they would like to use.

Appendix 8 - List of Related Websites

Name of Authority	Hyperlink
Australian Competition and Consumers Commission (ACCC)	https://www.accc.gov.au/publications/country-of-origin-food-labelling
Consumer Label Survey	http://www.foodstandards.gov.au/publications/Pages/consumer-labelsurvey2015.aspx
Country of Origin Labelling	https://industry.gov.au/industry/IndustrySectors/FoodManufacturingIndustry/Pages/Country-of-Origin-Labelling.aspx
Country of Origin Labelling Tool	http://www.originlabeltool.business.gov.au/
Food Safety Victoria	https://www2.health.vic.gov.au/public-health/food-safety
Food Standards Australia and New Zealand	http://www.foodstandards.gov.au/code/Pages/default.aspx
Health Star Rating	http://healthstarrating.gov.au/internet/healthstarrating/publishing.nsf/content/home
Mandatory Warning and Advisory Statement Link	https://www.foodstandards.gov.au/code/userguide/Documents/Guide%20to%201.2.3%20-%20Warning%20and%20Advisory%20Statements.pdf
National Measurement Institute	http://www.measurement.gov.au/Publications/trademeasurement/Documents/Guide-to-the-Sale-of-Pre-packaged-Goods.pdf
New South Wales Food Authority	http://www.foodauthority.nsw.gov.au/foodsafetyandyou/food-labelling
Nutritional Panel Calculator	https://www.foodstandards.gov.au/business/labelling/nutrition-panel-calculator
Therapeutic Good Administration Labelling and Packaging	https://www.tga.gov.au/labelling-packaging
Truth in Labelling	http://www.foodstandards.gov.au/consumer/labelling/truth/Pages/default.aspx

Appendix 9 - List of Allergy Related Websites

Name	Hyperlink
Allergen Bureau	http://www.allergenbureau.net/
Australian Food and Grocery Council	https://www.afgc.org.au/wp-content/uploads/AFGC-Allergen-Management-and-Labelling-Guide.pdf
Coeliac Australia	https://www.coeliac.org.au/
Food Allergy Training	https://foodallergytraining.org.au/
Food Industry Guide to Allergen Management and Labelling 2021-Industry Best Practice	https://allergenbureau.net/wp-content/uploads/2021/04/FIGAML_April_2021_F1.pdf
National Allergy Strategy	https://www.nationalallergystrategy.org.au/
Newspaper article in relation to food allergen deaths	http://allergenbureau.net/coroner-reports-two-melbourne-food-allergy-deaths/
NSW Government Allergen Info	http://www.foodauthority.nsw.gov.au/Documents/retail/be_prepared_be_allergy_aware.pdf
VITAL (Voluntary Incidental Trace Allergen Labelling)	https://vital.allergenbureau.net/