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Technical Summary: Labelling compliance

Producing a compliant food product label is about more than just listing the ingredients and completing the nutrition information panel.

Increasingly, the regulatory spotlight is falling on manufacturers that fail to comply with the requirements laid out in the food standards code (FSC) and enforced by the states and territories.

Chapter one of the FSC outlines the general labeling and information requirements that are relevant for all foods, as well as more specific requirements which apply in different circumstances.

There are 12 requirements outlined in standard 1.2.1, section 8; *Information required on food that is required to have a label.*



The full list of general requirements and references to the specific Standards containing further

information regarding each requirement are listed below:

- Name of the food (Standard 1.2.2-2);
- Lot identification (Standard 1.2.2-3);
- Name and address of the supplier (Standard 1.2.2-4);
- Advisory statements, warning statements and declarations

- (Standards 1.2.3-2, 1.2.3-3 and 1.2.3-4)
- e) A statement of ingredients (Standard 1.2.2-4);
- f) Date marking information (Standard 1.2.5-3);
- g) Storage conditions and directions for use (Standard 1.2.6-2);
- h) Information relating to nutrition, health and related claims (Standard 1.2.7-26 [4]);
- i) Nutrition information (Standard 1.2.8);
- j) Information about characterizing ingredients and characterizing components (standard 1.2.10-3); long
- k) Information relating to foods produced using gene technology (standard 1.5.2-4);
- l) Information relating to irradiation of food (standard 1.5.3-9);

In addition to the requirements laid out in the Food Standards Code, the Country of Origin Labeling (CoOL) requirements were introduced on the 1st of July 2016 under the Australian Consumer Law (and enforced nationally by the ACCC).

The CoOL requirements have been mandatory for all food businesses since the 1st July 2018.

The labelling requirements include a graphical representation of quantities of

products that have been grown/produced or packed in Australia compared to percentages of imported ingredients.

The associated graphic contains a kangaroo and a bar chart, if the ingredients or major processing came from Australia and a compliant label will look something like this:



For products substantially coming from outside Australia, the kangaroo logo cannot be used, with only the bar chart being available if the product was packed in Australia.

The categories in full are:

- a) Grown in Australia – for food where 100% of the ingredients are Australian grown
- b) Product of Australia – for food where 100% of the ingredients are Australian and all major processing has been undertaken in Australia
- c) Made in Australia – for food products where major processing has been undertaken in Australia (over and above slicing, canning, reconstitution and repacking activities)
- d) Packed in Australia – can only feature a bar chart which shows the percentage of Australian ingredients

- e) Product of “XXXX” – all imported foods produced, made, grown or packed outside Australia are shown with their country of origin on the label

CoOL compliance information:

a), b) and c) above are all able to use the kangaroo logo in addition to the bar chart.

d) can only use the bar chart logo

e) cannot use either the kangaroo or the bar chart

ALS offers support to help ensure that your labelling is compliant with the ANZ Food Standards Code.

For a comprehensive labelling compliance review and report, contact Nick Cork at the email address below.

Use the code “LabCom19” to access this service for only AUD150 per label (normally AUD500).*

If you have any other questions, please contact Nick Cork MAIFST:

M – 0476 830 459
E – nick.cork@alsglobal.com

* Offer only available to Premium Focus on Food Members as part of their membership benefits