

## LABELLING



### **The importance of labelling and its impact on food safety.**

**Food products must portray all ingredients and allergens. If we are supplied with products that contain allergens that were not declared (e.g. nuts), and a customer becomes ill, we could be held liable, along with the supplier! It is critical that suppliers adhere to Regulations (R146) relating to the labelling and advertising of foodstuffs under the Foodstuffs, Cosmetics and Disinfectants Act, 1972 (Act 54 of 1972).**

The Regulations were gazetted on R. 146 on the 1 March 2010 but was enforced on the 1 March 2011.

The regulations aim to promote best practice regarding the provision of information to consumers and help consumers to make more informed food choices.

The R. 146 impacts the retailer as you sell foods produced instore as well as bought-in pre-packed foods. The labelling requirements for foods made instore are different to the labelling requirements for bought-in, pre-packed products. According to the law, you as a retailer, have an obligation to ensure that both types of products comply with the regulations.

It is written that any person that manufactures, imports, packs, supplies, distributes and sells any pre-packed foodstuff, must comply with the labelling regulations. Review your Direct Suppliers' products with respect to labelling, as well as their facility food safety standards.

Therefore, before listing products that you are going to sell in the supplier's original packaging, it is your responsibility to ensure that the following is displayed on the product:

- The product name.
- The manufacturer/company/distributor or importer's name and physical address (a telephone number alone is not sufficient!).
- An ingredient list (if the product has more than one ingredient).
- Special storage conditions, where applicable.
- Instructions for use, where applicable.
- The net contents of the container i.e. weight or volume specifications that comply with the Trade Metrology Act (Act 77 of 1973).
- A date of durability. All processed foods must be labelled with a sell-by date.
- All details must be clearly visible and legible.

It is important to review your Direct Suppliers' products with respect to labelling, as well as ensuring their facility meets our minimum standard requirements. (The Labelling Regulations are available on the Dept of Health website [www.doh.gov.za](http://www.doh.gov.za) and the Trade Metrology Act is available from the SABS website ([www.sabs.co.za](http://www.sabs.co.za)))

This document deals with extracts from R. 146 that are relevant to products made and sold in-store from your service departments.

**This document is a guideline, it is your responsibility to familiarise yourself with the complete regulation and to comply with the requirements.**

### General

There are several prohibited statements with regards to labelling and advertising your food products. (R.146, Page 2 - 21 regulation 13):

#### Prohibited statements

13. The following information or declarations shall not be reflected on a label or advertisement of a foodstuff:

- (a) words, pictorial representations, marks, logos or descriptions which create an impression that such a foodstuff is supported, endorsed, complies with or has been manufactured in accordance with recommendations by-
  - (i) health practitioner, individually or through any professional or consumer advisory organisation consisting of one or more of the aforementioned health practitioners;
  - (ii) organisations, associations, foundations and other entities (excluding religious certifying organisations or any Fauna and Flora related certifying and endorsing bodies), unless approved by the Director-General and which can provide proof of the fact that they are involved in generic health promotion which is supported by evidence-based nutrition, and that the directions of the organisation, association or foundation do not contradict the requirements of these regulations in terms of nutrition claims and the criteria thereof;

- (b) an endorsement or testimonial of an individual in the form of a picture, written or verbal statement or in any other form, when the individual's endorsement or testimonial imply a nutrition claim;
- (c) an endorsement of a manufacturer or seller in the form of a logo, mark, symbol, written or verbal statement or any other manner of communication with regard the nutritional, or safety properties of the foodstuff brought to the attention of the public, unless it is valid according to the provisions of these regulations and appropriate substantiation can be provided to an inspector within 2 working days;
- (d) the words "health" or "healthy" or other words or symbols implying that the foodstuff in and of itself or a substance of the foodstuff has health-giving properties in any manner including the name or trade name, except in the case of the fortification logo for food vehicles as determined by regulations made under the Act and regulation 51(2);
- (e) the words "wholesome" or "nutritious" or any other words with a similar meaning in any manner including the name and trade name;
- (f) a claim that a foodstuff provides complete or balanced nutrition in any manner including the name and trade name;

There are a few descriptive words as outlined below that are only allowed to be used under special circumstances (R.146, Page 28 – 29 regulation 47):

#### **Misleading descriptions**

47. (1) Any word, statement, phrase, logo or pictorial representation which implies a message of being healthy or healthier or additive-free or veterinary medicine-free or which indicates the more humane treatment/rearing of food animals, such as, but not limited to, "grain fed", "grassfed", "Karoo lamb", "natural lamb", "country reared", "free range", "pure", "organic", which are linked to specific protocols which are registered with the Department of Agriculture or regulations in terms of the Agricultural Products Standards Act, 1990 (Act 119 of 1990) or National Regulator for Compulsory Specifications Act, 2008 (Act 5 of 2008), will be permitted on the prepackaged labelling and advertising of these products.

(2) In the case of foodstuffs that are not regulated in terms of the Agricultural Products Standards Act, 1990 (Act 119 of 1990) or National Regulator for Compulsory Specifications Act, 2008 (Act 5 of 2008), statements to the effect of being "fresh", "natural", "nature's", "pure", "traditional", "original", "authentic", "real", "genuine", "home made", "farmhouse", "hand-made", "selected",

**Use of the word “Fresh”:**

The word fresh can be used to describe fruit salad that is made only from fresh fruit.

- Expressions such as “freshly cooked”, “freshly prepared”, “freshly baked”, “freshly picked” should have no other connotation than the immediacy of the action being described. Where such expressions are used, it is recommended they be accompanied by an indication (e.g. of the date or time or period – “freshly prepared this morning”) of when the action being described took place.” (R. 146, Page 11, Regulation 31)
- Use of “oven fresh”, “garden fresh”, “ocean fresh” should be avoided as they have emotive appeal but no real meaning.
- Food that has been vacuum packed to retain its freshness should not be described as “freshly packed”. (R. 146, Page 12, Regulation 32)
- Fresh pasta is different to dried pasta in having a much higher moisture content and a shorter cooking time. Fresh pasta is traditionally considered as a short shelf life product (although chilling and vacuum packing may extend the shelf life). The term “fresh” can be used to differentiate a fresh pasta product from dried pasta. (R. 146, Page 13, Regulation 45)
- The term “fresh” should only be used in relation to frozen or processed foods if its use is clear from the context. For example: “frozen from fresh” should only be used to indicate a food was fresh (i.e. recently made or harvested) when it underwent freezing; “made with fresh ingredients” should be used only where the intended meaning is that no processed ingredients (i.e. ingredients that have been dried, freeze-dried, frozen, concentrated, powdered, smoked, canned, etc) were used; “made with fresh X” should only be used where X is the name of an ingredient that has not been processed and the food does not also contain processed equivalents of the same ingredient. For example, a food described as “made with fresh tomatoes” should not also contain canned tomatoes. (R. 146, Page 14, Regulation 47)
- For chilled convenience foods, unless the product complies with the appropriate criteria for use of the term “fresh” (or it is suggested otherwise in this Guidance), the term should not be used to describe foods when indicating a moderate shelf life under refrigerated conditions (e.g. for such products as chilled soups and sauces). (R.146, Page 14, Regulation 50).

**Use of the word “selected”:**

- Avoid the use of the term “selected”.

**Use of the word “home-made”:**

- To accommodate the production of meals and dishes on commercial catering premises, the term “home-made” should be restricted to the preparation of the recipe on the premises, from primary ingredients, in a way that reflects a typical domestic situation. This should not be achieved simply by the assembly of wholly pre-prepared elements, or simple reconstitution from dry base mixes, but must involve some degree of fundamental culinary preparation. As in domestic preparation, it would be legitimate for caterers to use partly-prepared ingredients that are available for domestic use; typical examples could include the use of pre-prepared raw pastry, bakery bread in desserts or stock cubes in sauces. (R. 146, Page 25, Regulation 84)

**Use of the words “premium”, “finest”, “quality” and “best”:**

- **“Recommended criteria for the use of the terms “premium”; “finest”; “quality”; and “best”**

Consumer research indicates that these terms were each seen as ways in which manufacturers differentiate their ranges of products to indicate the one that is ‘top of the range’. It would be advantageous if manufacturers and retailers could help consumers to understand why a claim of high level of overall quality is justified and why the particular term is used.

(R. 146, Page 27, Regulation 94).



Other descriptive words that can only be used under special circumstances:

If you intend using any of the following descriptions: natural, nature's, pure, traditional, original, authentic, real, genuine, farm-house or hand-made please refer to guideline 7 for qualifying criteria.

### Previously Frozen Products:

Food products that are purchased frozen and then thawed for sale shall not be labelled "fresh" and shall indicate the words "previously frozen".

(R. 146, Page 29, Regulation 47 (4))

- (4) Food products that were frozen and then thawed for subsequent sale-
- (a) shall not be labelled "fresh"; and
  - (b) shall indicate the words "**PREVIOUSLY FROZEN**"-
    - (i) on the label of pre-packaged foodstuffs in bold upper-case letters not less than 3 mm in height; or
    - (ii) on a poster placed in close vicinity of where the foodstuff is offered for sale, in clear view of and easily legible to the consumer, in black, bold letters of which the size is suitable for easy legibility on a poster, where such foodstuffs are not pre-packaged but exhibited for sale in bulk.

### Examples:

- a cake that is purchased frozen and thawed to be sold cannot be labelled "fresh" and shall indicate the words previously frozen as stated above.
- Raw chicken that is purchased frozen and thawed to be sold as raw chicken may not be labelled as "fresh" chicken and shall indicate the words previously frozen as stated above:
- Frozen lasagne that is thawed and cooked/heated and sold as a Hot Deli product may not be labelled "fresh" but **does not need** to state that the product was previously frozen.
- A frozen chicken that is thawed and roasted cannot be labelled as "fresh" but **does not need** to state that the product was previously frozen.

### Vegetarian Claims

Our suggestion is that stores refrain from making vegetarian claims as you will need to specify the category of vegetarian as outlined below.

#### Vegetarian claims

48. (1) Claims that a foodstuff is suitable for vegetarians shall specify the category of vegetarian by adding one or a combination of the following prefixes to the word "vegetarian":

- (a) "Lacto (milk)" – means milk and milk products are included but products in which animal rennet is used during preparation are excluded.
- (b) "Ovo (egg)" – means unfertilised eggs (preferably free-range) and egg products are included.
- (c) "Honey" – means honey is included.
- (d) "Strict vegetarian" or "vegan" means ingredients of multicellular plant, fungal, algal and bacterial origin are included but all ingredients and additives derived from animal origin are excluded.

(2) When a foodstuff is manufactured for the "strict vegetarian" or "vegan" market and a claim in respect of "strict vegetarian" or "vegan" is made on the label and it is not possible to conclude from the name of the ingredient or additive that they are derived from non-vegetarian origin, any additive (refer to Annexure 1) or ingredient (refer to Guideline 9) derived from non-vegetarian origin which is added to the foodstuff shall be declared as "non-vegetarian origin" or in words that specify the source in parenthesis after the name of the additive or ingredient.

**Nutrient content claims:**

- Do not make any claims relating to the nutrient content of products such as: low fat, fat free, sugar free, no added sugar, rich-in, diabetic, high fibre, low sodium, low GI etc unless you have proof following laboratory analysis in accordance with the requirements of the regulations and the levels of the nutrient comply with the legislation for the claim being made.
- Please refer to the FCD Act for specific details regarding claims.

**Naming of products**

- “Care should be taken when marketing terms are included in business names, trademarks and fancy names (a fancy name that includes a marketing term could be for example “Original Chicken Dinosaurs”, where the true name would be “Formed minced chicken and cereal in breadcrumbs”), as it is possible for these to create a false impression for a consumer.” (R. 146, Page 8, Regulation 17).

**Pictures and Illustrations**

Care should be taken when images are used in labelling and advertising to ensure that they are representative of the product being sold. Please see below:

**Pictorial representation**

34. The pictorial representation on the label or any advertisement of a foodstuff may not be presented in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding the contents of the container or its character, origin, composition, quality, nutritive value, nature or other properties in any respect.

Care should also be taken to ensure that background illustrations and pictures do not mislead the consumer as to the type, quality or origin of the product, e.g. kitchen scenes may lead a consumer to believing a product is hand-made.

**Date Marking: (FCD Act page 19 & 20, item 12)**

All food products sold, manufactured, distributed or donated (with the exception of unpeeled, unsliced fresh fruit and vegetables, biltong and dried sausage that has not been pre-packed and unprocessed meat and poultry that has not been pre-packed) must have a “sell by” and/or use-by and/or best before date on the label.

Ready-to-eat flour confectionary is exempted from a date of durability but must indicate a **date of manufacture** in the direct vicinity where the product is displayed OR on the label. The **date of manufacture** is not the same as a “packed date”. (R. 146, page 50, Annexure 4)

Date order for all date marking - when only numbers are used, the date must be in the order: “Day-Month-Year”. (DD-MM-YY)

**Date marking**

12. (1) No person shall import, manufacture, sell, distribute or donate a foodstuff unless a date marking is clearly indicated on the label or container of such foodstuff, except those foodstuffs indicated in Annexure 4.
- (2) The date shall be preceded by appropriate words “best before” and/or “use by”, and/or “sell by”, depending on the nature of the product; Provided that abbreviations shall not be permitted, except “BB” for “best before”, but the preceding words shall be written out in full.
- (3) The date marking may not be removed or altered by any person.

## Use of the word Organic or Organic Claims

What is organic?

Organic farming is nothing new, it's simply the return to farming methods that were in use before the introduction of modern chemicals (pesticides and fertilizers). Organic farming did not make use of chemical fertilizers, pesticides, herbicides or other additives such as hormones and antibiotics. There is no current legislation regulating the organics industry in South Africa. The proposed draft regulations have just been tabled and it is hoped that it will be enacted before the end of this year.



What is “Certified Organic”?

Organic farmers must work according to organic principles for a period of three years before they can be certified organic. The farmers are monitored frequently during this conversion period from conventional farming to organic. During the second year of this conversion process, produce from these farms can be labelled ‘organic in conversion’.

Certified organic products guarantee that growers have abided by the strict guidelines of an organic certifying body. A product can only be labelled “certified organic” if the product meets these certifying standards.

Certification Bodies for Organic Foods:

- Ecocert
- SGS
- BDOCA
- BCS
- Control Union
- Soil Association

If the product doesn't have any of these names/logos on the packaging, then it cannot be a certified organic product. It is recommended that you keep a copy of the certificate should customers or other bodies query the authenticity of the certification. Please note that certification is valid for one year, so please check that the certificate is currently valid! Please also note that certification is in respect of a specific category of products, e.g. Carrots, and so a general farm certification is not acceptable. As mentioned, above all, organically certified product must carry the logo of the accredited certification body on the packaging.

\*\* Please request a copy of the organic certification and keep on file

### Service department specific requirements

Our interpretation is that the regulations require the following in our fresh departments:

#### Deli (Hot and Cold)

- That for every product you prepare and sell (including salads sold from the salad bar, pies, samoosas and products pre-packed in store such as sandwiches) you have information on the list of ingredients, including allergens available at the point of sale upon request. This information can be kept in a file behind the Deli counter.
- (R. 146, Page 41 and 42. Exemption 3 (h) and (i)) The ingredients do not have to be displayed on each product.
- The information on the list of ingredients and allergens needs to be set out according to a specific format.

### Deli Cold Meats:

This refers to whole loaves that are displayed in the counter and sliced and sold in quantities as requested by the customer. Where there is enough space on the price ticketing used in the cabinet the ingredients and allergens can be displayed on the price ticketing. In cases where the price ticketing is too small, the list of ingredients and allergens should be kept in a file behind the counter.

It is recommended that a poster be displayed saying:

"For information on the list of ingredients and possible allergens in displayed products, please inquire at the Deli Counter."

### Bulk wrapped cheese

Bulk cheese that is cut and wrapped in store must have a label with the ingredient list and allergens on each block of cheese. The requirements are below:

#### LABELLING

The outer packaging of the dairy product known as cheese is cut and packed in the retail trade, the container or wrapper must be marked with the following particulars:

- (a) The class designation and if applicable the additions to the class designation in letters of the same type, size, colour and font, prominently on the main panel in letter size of at least 2mm for lower case vowels.
- (b) The additional on the main panel, where applicable.
- (c) The name and address of the manufacturer, packer, importer or seller of that dairy product or imitation dairy product: Provided that in the case where it is not possible to use the physical address a postal address with a telephone number may be used.
- (d) The nett and/or drained mass, or volume whichever one is applicable, of the dairy product or imitation dairy product packed therein as required in terms of the Trade Metrology Act, 1973 (Act No. 77 of 1973): Provided the height of the mass or volume indications shall comply with the requirements as set out in the Trade Metrology Act, 1973 (Act No. 77 of 1973).
- (e) The ingredient list, in the manner prescribed in the regulations published under the Foodstuffs, Cosmetics and Disinfectants Act, 1972 (Act No. 54 of 1972).
- (f) The "best before" or "use by" or "sell by" date and the batch code or batch number in the manner prescribed in the regulations published under the Foodstuffs, Cosmetics and Disinfectants Act, 1972 (Act No. 54 of 1972).
- (g) The country of origin, which shall be declared as follows:
  - (i) "Product of (name of country)" if all the main ingredients, processing and labour used to make the foodstuff are from one specific country; or
  - (ii) "Produced in (name of country)", "Processed in (name of country)", "Manufactured in (name of country)", "Made in (name of country)" or similar words when a foodstuff is processed in a second country changes its nature:
  - (iii) Provided that the words "Packed in (name of country)" may be used in addition to the requirement of sub-paragraph (i) or (ii) above.

The above mentioned are the minimum mandatory requirements.



Class Designation

Ingredients list

Name and address of the manufacturer

"Best before" or "use by" or "sell by" date

Batch code

Nett and/or drained weight or volume



### Bakery

For **every product you prepare and sell** you have information on the list of **ingredients, including allergens** available at the point of sale upon request. This information can be kept in a file behind the Bakery counter. (R. 146, Page 41, exemption 3(d) and (j))

Remember also that: ready-to-eat flour confectionary must indicate a **date of manufacture** in the direct vicinity where the product is displayed **or on the label**. The date of manufacture is not the same as a "packed date". (R. 146, Page 50, Annexure 4)

Terms such as "freshly baked", "baked in store" and "oven fresh" may mislead consumers into believing that they are being offered products that have been freshly produced on site from basic raw materials. Some stores sell bread made from part-baked products that have been packed in an inert atmosphere or frozen off-site then "baked off" at in-store bakeries. (R. 146, Page 13, Regulation 46) e.g. frozen croissants, frozen rolls.

When imitation cream is used in products it can no longer be referred to as "**fresh cream**" but **must** be renamed as "imitation cream" or "dessert topping". **Buttercream** icing should be renamed as "**icing**" or "**frosting**" e.g. Imitation cream donuts/donut with dessert topping or/and chocolate cake with chocolate icing.

### Butchery

**Unprocessed meat that has not been pre-packed:** exempted from any labelling requirements.

**Unprocessed meat that has been pre-packed:** should be packed in such a way that the purchaser is able to identify the contents of the package. The product needs to have an indication of the type of animal, fish/bird.

**Raw processed meats that have been manufactured in-store and pre-packed in-store or sold loose from a display counter: e.g. sausages, boerewors, marinated ribs and kebabs, spiced meat products:** requires information on the list of ingredients including allergens which must be available at the point of sale upon request. For meat that is injected with brine the in-going percentage of water and percentage of meat need to be available at the POS on request. (R. 146, Page 24, Regulation 26).

For meat that is mixed with any other ingredients to create a new product e.g. Boerewors, sausages, bangers, burger patties, meat balls, meat loaf, ground beef, beef olives etc. The in-going percentage of meat and water needs to be available with the information on the list of ingredients at the POS on request.

### Minced Meat:

Minced meat and processed meat can only be labelled as lean if it can be proven through laboratory analysis that it contains less than 10% total fat.

Minced meat and processed meat can only be labelled as **extra lean** if it can be proven through laboratory analysis that it contains less than 5% total fat. (R. 146, Page 36, Regulation 14)

### Use of the term "Fresh" in Butchery:

- Virtually all carcase meat is chilled following slaughter, principally as a hygiene measure. The term "fresh" is traditionally used to differentiate raw meat from that which has been (chemically) preserved. It would serve no purpose to disqualify chilled meat from use of the term "fresh". Use of the term "fresh" in these circumstances is acceptable.
- Meat that has been previously frozen, but which is sold thawed would not be considered by the average consumer to be "fresh". The term "fresh" should not be used in these circumstances. The product must say "previously frozen".

### Fruit and Vegetables:

Fresh, unprocessed (have not been peeled, cut or similarly treated) fruit and vegetables which have not been mixed are exempted from the requirements regarding labelling (except when a nutrition claim is made).

In the case of processed fruit and vegetables that have been mixed you are required to have information on the list of ingredients, including allergens available at the point of sale on request.

### Use of the word “Fresh” in Fruit and Vegetables:

- The term “fresh” is now used generically to indicate that fruit and vegetables have not been processed (e.g. canned, pickled, preserved or frozen), rather than that they have been recently harvested. This is acceptable provided it is not used in such a way as to imply the product has been recently harvested (e.g. “fresh from the farm”; “freshly picked”) if this is not the case (see paragraph 31 above).
- The term “fresh” may be used to describe fruit and vegetables that have been washed and/or trimmed, provided that an indication that they have been washed and/or trimmed is also present. However, in the case of prepared fruit or vegetables, e.g. “fruit salad” that could be described as “fresh”, then if it was obvious from its appearance for that product that fruit for example had been trimmed, peeled and cut then such indication would not be necessary, and it would be assumed that it had been washed.
- Chill temperatures and other controlled atmospheres are used in the food production chain for the delayed ripening and/or extended storage of fruit and vegetables. The use of the term “fresh” is acceptable in these circumstances.

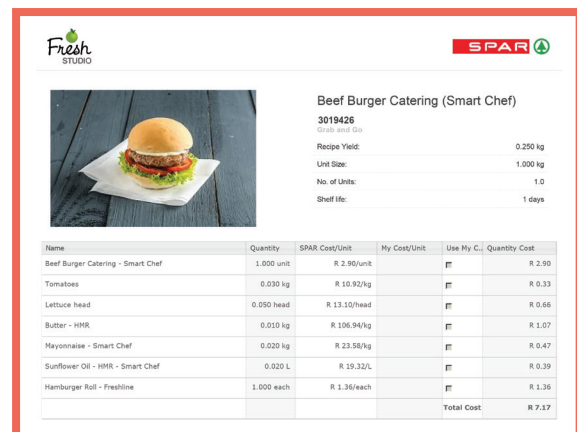
### Compiling your information on the list of ingredients:

Ensure that you have your recipe written down.

The recipe should be a standardised recipe that does not change.

The recipe should include the brand of ingredients that are being used.

It is vitally important that you do not differ from the recipe or substitute products with other brands as this will affect the ingredient statement.



Name	Quantity	SPAR Cost/Unit	My Cost/Unit	Use My C.	Quantity Cost
Beef Burger Catering - Smart Chef	1.000 unit	R 2.90/unit		<input checked="" type="checkbox"/>	R 2.90
Tomatoes	0.030 kg	R 10.92/kg		<input checked="" type="checkbox"/>	R 0.33
Lettuce head	0.050 head	R 13.10/head		<input checked="" type="checkbox"/>	R 0.66
Butter - HMR	0.010 kg	R 106.94/kg		<input checked="" type="checkbox"/>	R 1.07
Mayonnaise - Smart Chef	0.020 kg	R 23.56/kg		<input checked="" type="checkbox"/>	R 0.47
Sunflower Oil - HMR - Smart Chef	0.020 L	R 19.32/L		<input checked="" type="checkbox"/>	R 0.39
Hamburger Roll - Freshline	1.000 each	R 1.36/each		<input checked="" type="checkbox"/>	R 1.36
					<b>Total Cost: R 7.17</b>

Your recipe should reflect the in-going mass of all ingredients.

Ensure that you have recorded the quantity of water as well. Water needs to appear in the list of ingredients in the right order.

- Convert all the ingredient quantities to a mass in kilograms or grams. E.g. if your recipe uses a cup of milk, record the mass of a cup of milk (excluding the weight of the container). (Make use of the conversion table on Fresh Studio)
- Write down all the ingredients in the recipe in order of descending (biggest to smallest) mass. The name used for an ingredient in a list of ingredients should be the name used for such ingredient when independently sold as a foodstuff.
- Identify the compound ingredients. A compound ingredient is an ingredient that is made up of more than one ingredient. An example of a compound ingredient is mayonnaise as it consists of: eggs, oil, vinegar, herbs, spices etc.

4. For all compound ingredients, list the in-going ingredients in brackets after the name of the compound ingredient, e.g. mayonnaise (eggs, oil, vinegar, herbs and spices). You should copy this information off the label of the product exactly as it appears.
5. Oil needs to be listed as vegetable oil and then in brackets the specific type e.g. palm or sunflower as follows: vegetable oil (sunflower).
6. In the above mayonnaise example, the ingredient statement would read as follows: mayonnaise (eggs, vegetable oil (sunflower), vinegar, herbs and spices).
7. Identify all the common allergens in the product and record these under a separate heading called "Allergens".
8. Wherever wheat, rye, barley, oats and rye appear, the word gluten needs to appear in brackets after the ingredient name e.g. wheat flour (gluten).
9. When making a product that uses seasonal ingredients which may change from time to time e.g. stir-fry. The names of the ingredients other than the main ingredient shall appear consecutively but not in descending order of mass and shall be preceded by the expression "and/or" e.g. red pepper and/or green pepper and/or yellow pepper.
10. Where a product consists of/or contains mixed fruit, nuts or vegetables and no specific fruit, nut or vegetable predominates in mass, those ingredients may be listed in any order if:
  - a. In the case of a foodstuff which consists entirely of such mixture, the heading of the list of ingredients is accompanied by the words "in variable proportions" and
  - b. In the case of a foodstuff which contains such mixture, that part of the list where the names of the said ingredients appear is accompanied by the words "in variable proportions" e.g. mixed fruit (raisins, sultanas, cherries) in variable proportions.
11. In the case of a recipe that consists of a single ingredient e.g. steamed butternut with no seasoning, our suggestion is that the single ingredient is still declared in a list e.g. Ingredient Statement: Butternut Allergens: contains: None

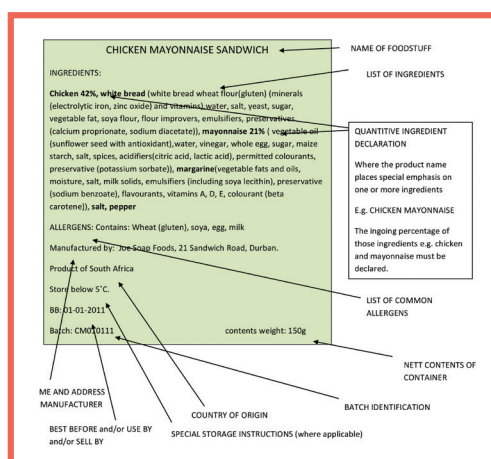
Suppliers of **pre-packed products** are required in terms of the legislation to put certain information on the labels of these products. When purchasing from direct suppliers it is your responsibility to ensure that the labels comply with the legislation.



### Information required on the label of a bought-in pre-packed product

2. No person shall manufacture, import, sell or offer any pre-packaged foodstuff for sale, unless the foodstuff container, or the bulk stock from which it is taken is labelled in accordance with these regulations.

The label below is an example showing the information that is required:



**CHICKEN MAYONNAISE SANDWICH** ← NAME OF FOODSTUFF

**INGREDIENTS:** ← LIST OF INGREDIENTS

**Chicken 42%, white bread** (white bread wheat flour (gluten) (minerals (electrolytic iron, zinc oxide) and vitamins), water, salt, yeast, sugar, vegetable fat, soya flour, flour improvers, emulsifiers, preservatives, (calcium propionate, sodium diacetate)), **mayonnaise 21%** (vegetable oil (sunflower seed with antioxidant), water, vinegar, whole egg, sugar, maize starch, salt, spices, acidifiers (citric acid, lactic acid), permitted colourants, preservative (potassium sorbate)), **margarine** (vegetable fats and oils, moisture, salt, milk solids, emulsifiers (including soya lechitin), preservative (sodium benzoate), flavourants, vitamins A, D, E, colourant (beta carotene)), **salt, pepper**

**ALLERGENS:** Contains: Wheat (gluten), soya, egg, milk

Manufactured by: Joe Soap Foods, 21 Sandwich Road, Durban.

Product of South Africa

Store below 5°C.

BB: 01-01-2011

Batch: CM070111

contents weight: 150g

**QUANTITATIVE INGREDIENT DECLARATION**

Where the product name places special emphasis on one or more ingredients

E.g. CHICKEN MAYONNAISE

The ingoing percentage of those ingredients e.g. chicken and mayonnaise must be declared.

**LIST OF COMMON ALLERGENS**

**NETT CONTENTS OF CONTAINER**

**BATCH IDENTIFICATION**

**ME AND ADDRESS MANUFACTURER**

**COUNTRY OF ORIGIN**

**BEST BEFORE AND/OR USE BY and/or SELL BY**

**SPECIAL STORAGE INSTRUCTIONS (where applicable)**