Moving to the USA, labelling of chocolate confectionery falls under the jurisdiction of the country's Food and Drug Administration (FDA). From this organisation a guidance document is available, which specifically states when the use of the term "chocolate" (rather than "chocolate flavouring") can be used on a label. According to the same document, the label of a non-standardised food which contains no artificial flavour or natural flavour derived from a source other than cacao beans can also be regarded as "chocolate". This is assuming the product meets one of the following two conditions:

- The product bears as its only source of chocolate flavouring an ingredient which complies with one of the standards of identity for cacao products;
- The product is flavoured with cocoa and the food is one that consumers have long recognised as containing cocoa as the characterising chocolate flavouring ingredient and is one that consumers do not expect to contain a chocolate ingredient.

The FDA supplies a standard of identity for many different varieties of chocolate and chocolate ingredients. These are divided into the following types: chocolate liquor, sweet chocolate, milk chocolate, buttermilk chocolate, skim milk chocolate, mixed dairy product chocolate, bittersweet chocolate and white chocolate. For each of these, the FDA lays down requirements regarding the formulation of the chocolate itself (e.g. milk and sugar content), as well as restrictions regarding what ingredients may be added to the product.

In addition to the varieties mentioned above, the FDA also permits certain food products which consumers might reasonably expect to be either chocolate flavoured or made with chocolate to carry the label "chocolate". Typical examples include chocolate milk, chocolate cake, chocolate pudding and chocolate biscuits/cookies.

At the time of writing, FDA regulations do not include a standard of identity for dark chocolate. This is despite the fact that similar standards exist for both milk and white chocolate, the latter of which came into effect during 2002 following extensive pressure from the Chocolate Manufacturers Association. The fact that dark chocolate is not as yet covered by FDA standards has led to petitioning, on the basis that products may carry the label "dark chocolate" even though they do not use real dark chocolate ingredients. Such products, it has been alleged, are likely to be made from vegetable fats such as palm oil, which may in turn mislead consumers over their supposed health benefits.

Similar classifications exist in Canada, where administration and enforcement of food labelling is carried out by the Canadian Food Inspection Agency. As is the case in the USA, chocolate products are segmented into categories such as milk chocolate, sweet chocolate, white chocolate and bittersweet chocolate, all of which carry stipulations regarding the quantity of key ingredients which must be used. However, the Canadian regulatory situation differs from its USA neighbour, in that cocoa butter substitutes are not permitted in the manufacture of chocolate confectionery. Canadian regulations also prohibit the use of certain

artificial sweeteners in chocolate, examples of which include aspartame, sucralose and sorbitol.

In Japan, the regulation of chocolate confectionery has been the responsibility of the Japanese Fair Trade Commission since the early 1970s. This organisation classifies six types of "chocolate materials", which are used in the manufacture of four varieties of "chocolate products". The chocolate materials, according to the Commission, include the following types: pure chocolate material, pure milk chocolate material, chocolate material, milk chocolate material, quasi-chocolate material and quasi-milk chocolate material. Each of these materials is required to contain specific percentages of key ingredients such as cocoa, milk and so on. Chocolate products as defined by the Commission include chocolate, chocolate sweet, quasi chocolate and quasi chocolate sweet.

Elsewhere in the Asia-Pacific region, food labelling in the Australasian countries is governed by Food Standards Australia New Zealand, which describes itself as a bi-Government agency and administers the Food Standards Code for both countries. As far as chocolate is concerned, the Australia New Zealand Food Standards Code defines it as "a confectionery product characterised by the presence of cocoa bean derivatives". Furthermore, the product must be prepared from a minimum of 200 g per kg of cocoa bean derivatives and must contain no more than 50 g per kg of edible oils, other than cocoa butter or dairy fats.

Conclusions

Arguably the greatest challenge facing the world's chocolate industry is the pressure it is currently facing from the healthy eating trend. This has been one of the main underlying reasons why growth rates in consumption have tailed off in parts of the world, while health concerns from consumers have also resulted in many of the industry's leading players reformulating their chocolate confectionery products to lower calories, as well as sugar and saturated fat levels.

It seems unlikely that the pressure upon the industry to help address escalating obesity rates will abate any time soon. In the UK, for instance, Mondelez International, Mars and Nestlé were signatories to a Government pledge to cut five billion calories from the nation's diet in 2012. This target is likely to come under strong scrutiny from the media and the health lobby, although it does provide an example of how seriously chocolate confectionery manufacturers are taking their responsibility to help people eat more healthily.

Although chocolate producers have been extremely active as far as product reformulation is concerned, it is questionable how much further action is possible on their part. Reductions in sugar usually have profound implications on chocolate confectionery products in terms of both taste and texture, while manufacturers are also hampered by the fact that global demand for reduced-sugar and/or sugar-free chocolate remains extremely limited. Thus far, the latter