

Standard 1.2.4

Labelling of Ingredients

Purpose

This Standard sets out specific requirements for the labelling and naming of ingredients and compound ingredients.

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1 Interpretation

In this Standard -

compound ingredient means an ingredient of a food which is itself made from two or more ingredients.

ingredient means any substance, including a food additive, used in the preparation, manufacture or handling of a food.

2 Requirement for statement of ingredients

The label on a package of food must include a statement of ingredients unless-

- (a) the food is labelled with the name of the food which would otherwise be those ingredients listed in the ingredient list; or
- (b) the food is an alcoholic beverage standardised in Part 2.7 of this Code; or
- (c) the food is contained in a small package; or
- (d) the food is liquid milk and milk products and cream and cream products sold in glass bottles with no label other than that on the foil cap.

Editorial note:

Clause 4 of Standard 1.2.3 requires the presence of certain substances in food (which are listed in the Table to the clause) to always be declared in the label, for example, egg and egg products. Therefore, the exemptions listed in clause 2 of this Standard do not apply in relation to those substances.

“INGREDIENTS”, “INGREDIENTS IN DESCENDING ORDER”, “MADE FROM”, “CONSISTS OF” or “CONTAINS” or words to that effect may be used as a heading to the statement of ingredients.

3 All ingredients to be listed in a statement of ingredients

A statement of ingredients must list every ingredient in the food unless the ingredient is -

- (a) an ingredient of a flavouring as defined in Schedule 5 of Standard 1.3.1; or
- (b) a volatile ingredient which is completely removed during manufacture; or
- (c) added water where –
 - (i) the water is added to reconstitute dehydrated or concentrated ingredients;
 - (ii) the water forms part of broth, brine or syrup which is declared in the ingredient list or is part of the name of the food; or
 - (iii) the water constitutes less than 5% of the final food; or
- (d) a substance used as a processing aid in accordance with Standard 1.3.3.

4 Ingredients to be listed by common, descriptive or generic name

Ingredients must be declared in the statement of ingredients using -

- (a) the common name of the ingredient; or
- (b) a name that describes the true nature of the ingredient; or
- (c) where applicable, a generic name set out in the Table to this clause.

Editorial note:

The term ‘common name’ does not have a technical meaning for the purposes of paragraph 4(a), and should be given its ordinary meaning.

The names of ingredients should be sufficiently detailed and accurate to ensure they are not false, misleading or deceptive, or likely to mislead or deceive. The generic names listed in the Table to Clause 5 may be accompanied by a suitable word or words to further specify the ingredient for example, cheese powder, poultry meat fillets, dried vegetables.

Table to Clause 4

Generic name	Conditions for Use
cereals	Where the cereal is wheat, rye, barley, oats or spelt then the specific name of the cereal must be declared.
cheese	No specific condition set
cocoa butter	No specific condition set
crystallised fruit	No specific condition set
fats or oils	<ol style="list-style-type: none"> 1. Must be qualified as to whether the source is animal or vegetable 2. Where the source of vegetable oil is peanut, soy bean or sesame the specific source name must be declared 3. In the case of dairy products, including icecream, the source of animal fats or oils must be specifically declared
fish	If crustacea, the specific name of the crustacea must be declared
fruit	No specific condition set
gum base	No specific condition set
herbs	No specific condition set
meat	No specific condition set
milk protein	No specific condition set
milk solids	No specific condition set
nuts	The specific name of the nut must be declared
poultry meat	No specific condition set
spices	No specific condition set
starch	Where the source of the starch is wheat, rye, barley, oats or spelt then the specific name of the cereal must be declared. The name 'starch' may be used for any unmodified starch or any starch which has been modified by either physical means or enzymes
sugar	<ol style="list-style-type: none"> 1. May be used to describe; white sugar, white refined sugar, caster sugar, castor sugar, loaf sugar, or cube sugar, icing sugar, coffee sugar, coffee crystals, raw sugar 2. The word 'sugars' must not be used in a statement of ingredients
vegetables	No specific condition set

Editorial note:

'Milk solids' may be used to describe milk powder, skim milk powder, dried milk products standardised in this Code and/or any two or more of the following ingredients: whey, whey powder, whey proteins, lactose, caseinates, milk proteins and milk fat.

5 Ingredients to be listed in descending order of ingoing weight

- (1) Ingredients must be declared in the statement of ingredients in descending order of ingoing weight, except -
- (a) where a dehydrated or concentrated ingredient is reconstituted during preparation, manufacture or handling of the food, in which case, the position of that ingredient in the statement of ingredients may be determined by the weight of the ingredient before concentration or dehydration; and/or
 - (b) where any dehydrated or concentrated food is intended to be reconstituted in accordance with directions, in which case, the ingredients may be stated in descending order of proportion by weight in the reconstituted product, provided it is clear that the ingredients are being declared in order of their weight when reconstituted; and/or
 - (c) added water and volatile ingredients, which must be declared in accordance with subclause 5(2); and/or
 - (d) compound ingredients, which must be declared in accordance with clause 6.

Editorial note:

The statement of ingredients may be headed, for example, by the words "ingredients when reconstituted" to make it clear that the ingredients are being declared in order of their weight when reconstituted.

- (2) Added water or a volatile ingredient must be declared in the statement of ingredients immediately following the ingredient with the closest higher ingoing weight but shall be calculated in accordance with the ingoing weight of the added water or volatile ingredient minus the amount of that ingredient that is removed and/or used for reconstitution of dehydrated or concentrated ingredients during preparation, manufacture or handling of the food.

6 Declaration of compound ingredients

- (1) A compound ingredient must be declared in the statement of ingredients either-
- (a) except in the case of food standardised in Standard 2.9.2, by declaring the compound ingredient by name in its appropriate place in the statement of ingredients, and listing its ingredients in accordance with subclause (2); or
 - (b) by declaring all of the ingredients of the compound ingredient separately as if they were individual ingredients of the final food.

Editorial note:

For example, the statement of ingredients for canned spaghetti might read

‘spaghetti (flour, egg, water), meat, sugar, water’

under option (a) or

‘flour, meat, egg, sugar, water’

under option (b).

(2) Except in the case of an alcoholic beverage specified in Part 2.7 of this Code, those ingredients of a compound ingredient must be declared by listing them in brackets after the name of the compound ingredient, in descending order of ingoing weight in the compound ingredient as specified in the Table to this clause.

Table to clause 6

Amount of compound ingredient in the food	Ingredients of the compound ingredient to be included in the statement of ingredients
5% or more	all ingredients
less than 5%	subject to clause 4 of Standard 1.2.3, all food additives in the compound ingredient where the food additive is performing a technological function in the final food

Editorial note:

Determining when a food additive is performing a technological function in a food may be difficult at times and will depend on the nature of the compound ingredient which contains the additive and the food in which the compound ingredient is used. In this regard, manufacturers should consider what the critical factors are in the final food (eg. shelf life, colour, texture) and determine whether the food additives added via compound ingredients are functioning in such a way as to affect these critical factors. If they are, then it is likely that the food additives are performing a technological function in the final food and should therefore be declared.

Some food additives, added as part of the compound ingredients, may not be performing a technological function in the final food because of some processing. For example, a preservative in apple pulp will not necessarily be performing a technological function once the apple pulp has been added to a pie and then baked. Likewise, lecithin in milk powder which is then incorporated into a cake mix is not likely to be performing a function in the cake. Manufacturers need to consider this when designing labels.

Manufacturers could obtain information from ingredient suppliers or food additive manufacturers about whether a food additive may or may not be performing a technological function in the final food. This type of information would also be valuable should a manufacturer be asked to substantiate why a particular additive is or is not being declared in an ingredient list.

7 Declaration of alternative ingredients

Where the composition of a food may be subject to minor variations by the substitution of an ingredient which performs a similar function, the statement of ingredients may list both ingredients in a way which makes it clear that alternative or substitute ingredients are being declared.

Editorial note:

For example the statement of ingredients for a biscuit may read; flour, safflower oil or sunflower oil, sugar, water.

8 Declaration of food additives

- (1) Food additives must be declared in accordance with the ingredient labelling requirements of this Standard.
- (2) Where an additive must be declared and can be classified in one of the classes of additives listed in Schedule 1 of this Standard the additive must be declared by the name of that class followed by the additive's specific name or code number in brackets, as indicated in Schedule 2 of this Standard.
- (3) Subclause (2) does not apply to the declaration of the optional class name 'enzyme'.

- (4) Where a food additive is capable of being classified in more than one class, the most appropriate class name must be used.
- (5) A food additive that cannot be classified in one of the classes specified in Schedule 1 must be declared in the statement of ingredients by use of its prescribed name.
- (6) Subject to subclause (9), where a flavouring is added to or used in a food as an ingredient it must be declared in the statement of ingredients by either -
- (a) the word 'flavouring' or 'flavour'; or
 - (b) a more specific name or description of the flavouring.
- (7) Where L-glutamic acid, monosodium glutamate, monopotassium L-glutamate, calcium di-L-glutamate, monoammonium L-glutamate, magnesium di-L-glutamate, disodium guanylate, disodium inosinate, and disodium 5'-ribonucleotides are added to a food as a flavouring, their presence must be specifically declared by their name or code number.
- (8) Where the composition of a food may be subject to minor variations by the substitution of an additive which performs a similar function, the statement of ingredients may list both additives in a way which makes it clear that alternative or substitute additives are being declared.
- (9) Where caffeine is added to a food it must be declared in the ingredient list as caffeine.

Editorial note:

For the purposes of subclause 8(3), enzymes need only be declared by the class name 'enzyme' and not by specifically declaring the name of the enzyme.

An example for subclause 8(8) is where a manufacturer chooses to use preservative X for 6 months of the year and preservative Y for the rest of the year, one label may indicate that either preservative was used in the preparation, manufacture or handling of the food eg. preservative (X or Y) where X and Y may be expressed as either the additive's specific name or code number, if any.

Manufacturers may use additional words to qualify class names or food additives, subject to the following -

In Australia, the provisions of the State and Territory Food and Health Acts, State and Territory Fair Trading Acts, and *Trade Practices Act 1974* as they relate to false, misleading or deceptive conduct and/or representations; and

In New Zealand, the *Food Act 1981* and the *Fair Trading Act 1986*, as they relate to false, misleading or deceptive conduct and/or representations.

9 Declaration of vitamins and minerals

Where a vitamin or mineral is added to a food, the vitamin or mineral may be declared in accordance with clause 8 of this Standard using the class name 'vitamin' or 'mineral'.

Schedule 1

Prescribed	Optional
Acid	Antifoaming Agent
Acidity Regulator	Emulsifying Salt
Alkali	Enzyme
Anticaking Agent	Mineral Salt
Antioxidant	Modified Starch
Bulking Agent	Vegetable Gum
Colour	
Emulsifier	
Firming Agent	
Flavour Enhancer	
Foaming Agent	
Gelling Agent	
Glazing Agent	
Humectant	
Preservative	
Raising Agent	
Stabiliser	
Sweetener	
Thickener	