



Labelling issues for native plant foods and similar products

John Faragher, The Patch, Victoria.
Robert Premier, Department of Primary Industries, Knoxfield, Victoria.
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Legislative requirements

The Food Standards Code, published by Food Standards Australia and New Zealand (FSANZ), spells out labelling standards and the states have adopted these standards. The Food Standards Code requires that most foods are labelled with the following:

- Name
- Lot
- Supplier details
- Ingredients (all ingredients including food additives)
- Date marking, usually "best before" date
- Directions for use, if needed for health and safety
- Nutrition information panel
- Percentage composition, at least for the key and characterising ingredients, including the ingredients used in the product name (e.g. bush tomato in bush tomato chutney)
- Country of origin

Some things are exempt from these labelling requirements:

- Food not in a package, but unpackaged fresh and processed fruit and vegetables must be labelled to show which country they come from, including Australia
- Food in an inner package not designed for sale without an outer package
- Food made and packed at the point of sale
- Food packaged in the presence of the purchaser
- Whole or cut fresh fruit and vegetables (except sprouting seeds) in packages that do not obscure the fruit or vegetable (but country-of-origin labelling may be introduced)
- Food delivered packaged and ready for consumption at the express order of the purchaser
- Food sold at a fund raising event

Labelling requirements change so we advise that you check specific requirements with FSANZ, local council or the state food authority (or health department).

Even if you are not required by legislation to label the products it might be in your interests to do so.

Nutrition information panels

These must provide information on the amount of energy, protein, fat (total and saturated), carbohydrate, sugar and sodium in the food. It can also provide information on other nutrients (e.g. fibre and vitamins). The information required for nutrition information panels can be obtained from analyses or from databases such as the FSANZ NUTTAB database and the FSANZ Nutrition Panel calculator (details below). The nutrient values may need to be calculated from the known proportion of individual ingredients in the final product. Some data can be obtained from native food books (e.g. Tables of Composition of Australian Aboriginal Foods, 1993).

Some products currently do not require nutrition information panels, provided no nutrient content claims are made (see below):

- Packages smaller than 100 square centimetres in surface area
- Fruit, vegetables, meat or fish that comprise a single ingredient
- A herb, a spice, a herbal infusion
- Additives and processing aids

Products supplied to a major client such as a supermarket will need to comply with specific labelling requirements. These usually follow standard requirements, but may require additional information and laboratory analysis to determine nutrition information.

If a nutrient content claim is made on the label, indicating the presence or absence of a nutrient, energy content or biologically active substance (e.g. fibre, vitamins or *trans*-fatty acid content), then the content must be listed in the nutrition information panel.



Health claims will probably be allowed in future and these can be either general or high-level claims. An example of a general claim is that a food high in calcium might carry a claim 'Calcium is good for strong bones and teeth, when consumed as part of a healthy diet containing a variety of foods'. High-level claims refer to an effect on a serious disease or condition. All claims will need to be substantiated by scientific evidence and the levels of the claimed active ingredients will need to be given on labels.

Labelling as part of marketing

Labels must provide the information that customers want!

A label is a very powerful marketing tool. Marketing experts recommend that the native plant food industry have recognisable brands that guarantee to deliver high-quality food. These brands can be regional brands and they can be the brands of collective marketing groups. Use of the brand could be restricted to those who comply with a certain code of practice.

Labels can have information on them that show:

- That the product meets certain quality or safety standards
- The product is organic (with the logo of the certifying body)
- The product meets the requirements of an environmental management system
- The botanical name of the main ingredients in the product (highly recommended)
- Interesting information about the contents, the source of the products and the way the products can be used
- Attractive expressions such as "Kakadu Clean Cuisine", "Gourmet Product of Australia", "Australian Native Cuisine", "This food is produced in a clean environment"
- That the product contains no GM ingredients

Statements on labels need to be truthful and need to be able to be proven.

Further information

Web sites:

- FSANZ Food Standards Code Part 1.2 Labelling and other information requirements:
www.foodstandards.gov.au/thecode/foodstandardscode.cfm#_one
- Nutrient database NUTTAB 2006:
www.foodstandards.gov.au/monitoringandsurveillance/nuttab2006/
- Nutrition panel calculator:
www.foodstandards.gov.au/thecode/nutritionpanelcalculator/index.cfm
- Australian Native Food Industries Limited:
www.cse.csiro.au/research/nativefoods/development/board.htm
- Names of Australian plants: www.anbg.gov.au/acra/
- CSIRO's native plant food site:
www.cse.csiro.au/research/nativefoods/

- Overview of food labelling, 2001, FSANZ Fact sheet:
www.foodstandards.gov.au/newsroom/factsheets/industryfactsheetsfsc/overviewoffoodlabell1436.cfm
- Food labels-what do they mean? FSANZ poster:
www.foodstandards.gov.au/_srcfiles/final%20FSANZPosterV2.pdf
- Country of origin labelling, 2005, FSANZ Fact sheet:
www.foodstandards.gov.au/newsroom/factsheets/factsheets2005/countryoforiginlabel3022.cfm
- New nutrition information requirements on food labels, FSANZ fact sheet:
www.foodstandards.gov.au/newsroom/factsheets/industryfactsheetsfsc/nutritioninformation1615.cfm
- Nutrition and health and related claims, FSANZ Fact sheet:
www.foodstandards.gov.au/newsroom/factsheets/factsheets2007/nutritionandhealthre3551.cfm

Other publications:

- All FSANZ information on the Internet is available as a printed copy. See Contacts below.
- Tables of Composition of Australian Aboriginal Foods, 1993, by J. Brand-Miller, K.W. James, and P.M.A. Maggiore, Aboriginal Studies Press, Canberra.
- State food authorities, usually within health departments, publish guides to labelling, but the requirements are essentially those of the FSANZ Standards described above.

Contacts:

- Your local council's Environmental Health Officer
- State food authorities, usually within health departments
- Food Standards Australia and New Zealand (FSANZ)
Phone: (02) 6271 2222,
e-mail:info@foodstandards.gov.au
- Robert Premier, Department of Primary Industries, Knoxfield, Victoria. Private Bag 15 Ferntree Gully Delivery Centre, Victoria 3156. Phone (03) 9210 9225
- John Faragher, 10 Portman Rd., The Patch, Victoria 3792. Phone (03) 9752 0768

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