

# GUIDELINES

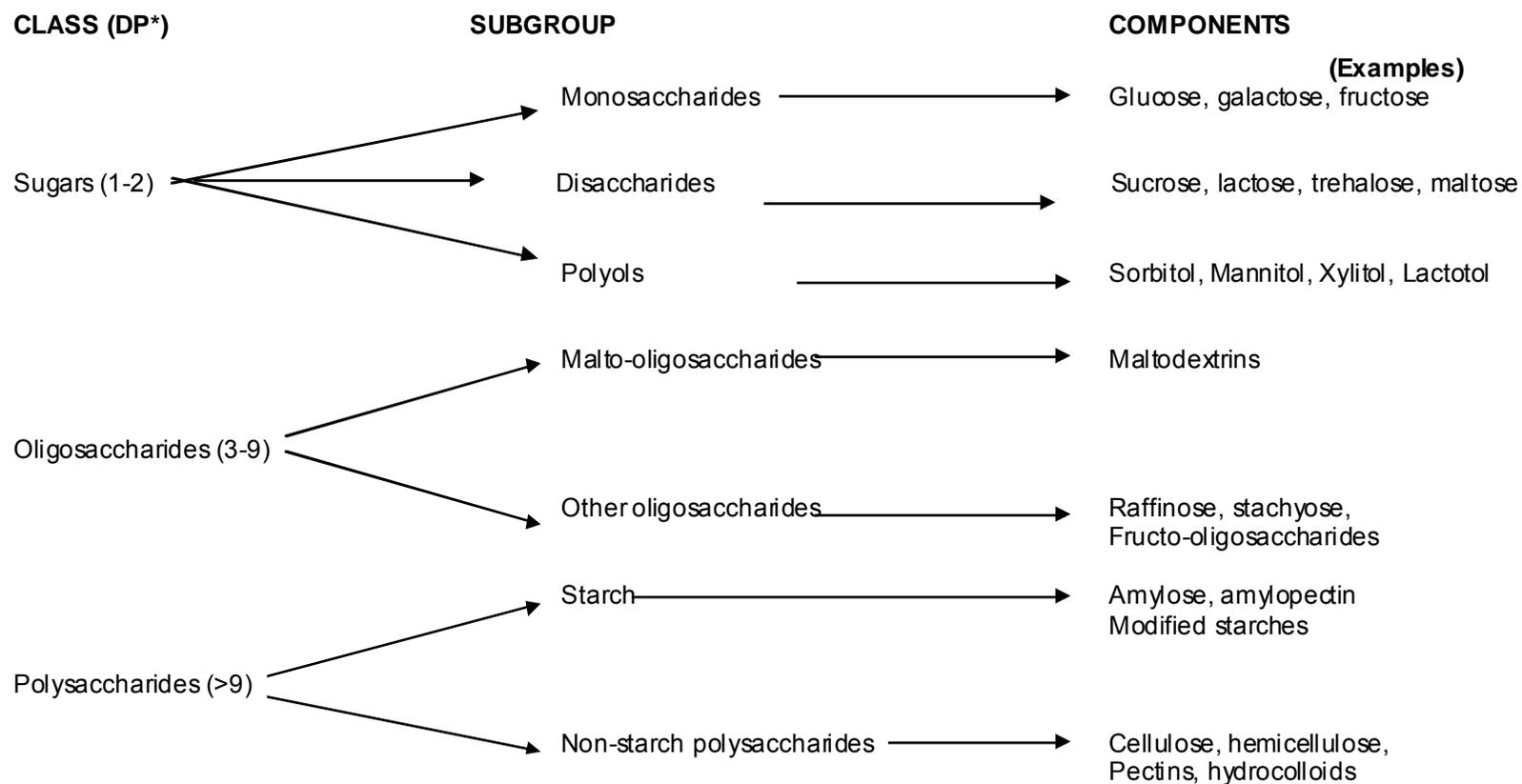
THESE GUIDELINES ARE APPLICABLE TO THE REGULATIONS RELATING THE LABELLING AND ADVERTISING OF FOODSTUFFS (R.146 OF 1 MARCH 2010), FOR COMPLIANCE PURPOSES

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## GUIDELINE 1

### THE MAJOR DIETARY CARBOHYDRATES



**DP\* = Degree of polymerisation**

**References:** Carbohydrates in Human Nutrition (1997): Report of a Joint FAO/WHO Expert Consultation, Rome.

## GUIDELINE 1(Continued)

### THE MAJOR DIETARY CARBOHYDRATES

#### RECOMMENDED METHODS OF ANALYSIS

##### 1. Glycaemic carbohydrate:

For purposes of energy evaluation, a standardised, direct analysis of available carbohydrate (by summation of individual carbohydrates) (FAO, 1997; Southgate, 1976) is preferable to an assessment of available carbohydrate by difference which is done by calculation rather than analysis. Direct analysis allows separation of individual monosaccharides, disaccharides and starch, which is useful in determination of energy values. Direct analysis is considered the only acceptable method for analysis of carbohydrate in foods, especially when any type of carbohydrate claim or carbohydrate related claim is made.

Glycaemic carbohydrates, namely glucose, fructose, galactose, sucrose, lactose, maltose, trehalose, maltodextrins and starch can be determined by adding together all the analytical values.

##### 2. Definition of dietary fiber

The definition of dietary fiber is clearly linked to fruits, vegetables and whole-grain cereals. The established epidemiological support for the health benefits of dietary fiber is based on diets that contain fruits, vegetables and whole-grain cereal foods, which have the characteristic of containing plant cell walls. It is this food component that should form the basis of a dietary fiber definition as it provides a consistent indicator of the plant foods promoted in guidelines, intake of which has been used to establish population reference values for dietary fiber.

The structural polysaccharides are the major part of plant cell walls, and by determining this characteristic component it is possible to indicate the presence of other beneficial substances, such as micronutrients and phytochemicals that are present in the plant. This approach is preferable to the determination of all the individual parts of plant cell wall material, which is both impractical and would not add to the nutritional message that is provided by focusing on the polysaccharides of the plant cell wall. Therefore, lignin and other substances are not included in the definition of dietary fiber when measured for non starch polysaccharides (NSP).

Other carbohydrates share the feature of resisting digestion in the small intestine, but these do not provide a consistent indicator of plant rich diets, and they can be affected by food processing or may be added to food. Until recently, there has not been wide-scale use of fiber-like ingredients as supplements, and the current epidemiological evidence base for dietary fiber rich foods cannot be extrapolated to diets containing

such preparations. To include them within a dietary fiber definition would clearly represent a conflict with reference intake values and health claims, which are derived mainly from these population studies.

The inclusion criteria based on the demonstration of specified physiological properties is neither appropriate nor manageable within a dietary fiber definition. Instead, resistant starch, oligosaccharides and fiber supplements (prebiotics) should be researched and, if shown to be beneficial to health, be promoted in their own right. Considering the variation in chemical and physiological properties involved, the best approach is to validate and if appropriate, establish health claims on an individual basis.

The definition for dietary fiber does not include non digestible oligosaccharides, which have a DP mostly between 3 and 9. This group of carbohydrates, which can be called short chain carbohydrates, have chemical, physical and physiological properties that are distinct from the polysaccharides of the plant cell wall, e.g. water solubility, organoleptic properties, effects on the gut microflora (prebiotic), immune function and calcium absorption making them a unique group of carbohydrates, which should be measured separately. They have not, hitherto, been considered to be part of dietary fiber.

Non-digestibility in the small intestine groups together a wide variety of carbohydrates that includes polyols, oligosaccharides, some starch, non starch polysaccharides, and in many populations, lactose. This detracts from the essential role of dietary fiber as plant cell wall carbohydrate found in whole-grain cereals, fruits and vegetables. Furthermore, each of these various carbohydrates has distinct properties other than non-digestibility, which should be measured and exploited separately from dietary fiber for their own benefits to health. Non-digestibility cannot be measured in the laboratory. Therefore, there is no method that can support such a definition. "Digestibility" has a very different connotation when used to describe the digestible energy of foods. Although there is no formally agreed international definition of digestibility for humans in the field of energy values of food, "digestibility is defined as the proportion of combustible energy that is absorbed over the entire length of the gastrointestinal tract". Patterns of carbohydrate digestibility in the human gut can vary not only amongst different carbohydrates, but also from person to person and, therefore, the term "digestibility" is probably best reserved for total digestion and absorption from the whole gut. Digestion should be seen as an integrated whole gut process. Most nutrients and food components are defined and measured as chemical substances, e.g. fat, protein, vitamins, minerals and not by their alleged functions.

This emphasizes that dietary fiber reflects fruits, vegetables and whole-grain cereal foods. The "carbohydrate polymers which have been obtained from food raw materials by physical, enzymic or chemical means" or "synthetic carbohydrate polymers" were not included, because, again, it was felt that the emphasis should be on the role of dietary fiber reflecting a natural plant-rich, whole food diet. Other sources of non-glycaemic carbohydrates (polyols, oligosaccharides (non- $\alpha$ -glucan), resistant and modified starches, non-starch polysaccharides) would best be served by individual health claims that take into account their specific efficacy and dosage issues.

**TABLE: METHODS OF ANALYSIS FOR DIETARY FIBER AND NOVEL FIBERS**

<b>Recommended method for measuring dietary fiber as NSP as defined in the Regulations Governing the Advertising and Labelling of Foodstuffs.<sup>(2)</sup></b>				
<b>Standard</b>	<b>Component(s) measured</b>	<b>Method</b>	<b>Principle</b>	<b>Type</b>
All foods containing fruit, vegetables and whole-grain cereals	Non-starch polysaccharides (NSP) <sup>(3)</sup>	Englyst H N, Quigley M E, Hudson G J, (1994) Determination of Dietary Fiber as Non-starch Polysaccharides with Gas-Liquid Chromatographic, High-performance Liquid Chromatographic or Spectrophotometric Measurement of Constituent Sugars, Analyst, 119, 1497-1509.	Enzymatic Gas-Liquid Chromatographic method	IV
<b>General methods that do not measure the lower molecular weight fraction (i.e., monomeric units &lt;9)<sup>(2)</sup></b>				
All foods <sup>(1)</sup>	Resistant insoluble and soluble polysaccharides, resistant, lignin and plant cell wall, base on precipitation in 4 parts alcohol and 1 part water. <sup>(4)</sup>	AOAC 985.29	Enzymatic gravimetric	III
All foods <sup>(1)</sup>	Resistant insoluble and soluble polysaccharides, resistant, lignin and plant cell wall, base on	AOAC 991.43	Enzymatic gravimetric	III

	precipitation in 4 parts alcohol and 1 part water. <sup>(4)</sup>			
All foods <sup>(1)</sup>	Resistant insoluble and soluble polysaccharides, resistant, lignin and plant cell wall, base on precipitation in 4 parts alcohol and 1 part water. <sup>(4)</sup>	AOAC 992.16	Enzymatic gravimetric	III
All foods <sup>(1)</sup>	Suitable for foods with less 2% starch	AOAC 993.21	Non-enzymatic gravimetric	III
All foods <sup>(1)</sup>	Quantification of component neutral sugars, uronic acids plus Klason lignin, based on precipitation in 4 parts alcohol and 1 part water. <sup>(4)</sup>	AOAC 994.13	Enzymatic chemical	III
<b>General methods that measure both the higher (monomeric units &gt;9) and the lower molecular weight fraction (monomeric units, &lt;=9) the lower molecular weight fraction (i.e., monomeric units &lt;=9)<sup>(2)</sup></b>				
All foods <sup>(1)</sup>	Resistant insoluble and soluble polysaccharides, resistant malto-dextrins, lignin and plant cell wall, <sup>(3)</sup> based on precipitation in 4 parts alcohol and 1 part water.	AOAC 2001.03	Enzymatic gravimetric and Liquid Chromatography	III
All foods <sup>(1)</sup>	Soluble and insoluble polysaccharides + lignin+ resistant starch + oligosaccharides)	AOAC 2009.01	Enzymatic gravimetric-High-Pressure Liquid Chromatography	III
<b>Methods that measure individual specific components (monomeric units: the whole range for type of components is covered)<sup>(2)</sup></b>				

All foods <sup>(1)</sup>	Insoluble dietary fibers in food and food products	AOAC 991.42	Enzymatic gravimetric	III
All foods <sup>(1)</sup>	(1→3)(1→4) <i>Beta</i> -D-glucans	AOAC 992.28	Enzymatic	III
All foods <sup>(1)</sup>	Soluble dietary fibers in food and food products	AOAC 993.19	Enzymatic gravimetric	III
All foods <sup>(1)</sup>	(1→3)(1→4) <i>Beta</i> -D-glucans	AOAC 995.16	Enzymatic	III
All foods <sup>(1)</sup>	Fructans (oligofructoses, inulin, hydrolyzed inulin, polyfructoses, fructooligosaccharides)	AOAC 997.08	Enzymatic & HPAEC-PAD	III
All foods <sup>(1)</sup>	Fructans (oligofructoses, inulin, hydrolyzed inulin, polyfructoses, fructooligosaccharides)	AOAC 999.03	Enzymatic & colorimetric	III
All foods <sup>(1)</sup>	Polydextrose	AOAC 2000.11	HPAEC-PAD	III
All foods <sup>(1)</sup>	Trans-galacto-oligosaccharides	AOAC 2001.02	HPAEC-PAD	III
All foods <sup>(1)</sup>	Resistant starch (Recommended for RS2 & RS3)	AOAC 2002.02	Enzymatic	III
<b>Other methods<sup>(2)</sup></b>				
All foods <sup>(1)</sup>	Insoluble glucans and mannans of yeast cell wall (for yeast cell wall only)	Eurasyp (European association for speciality yeast products) – LM Bonnano. Biospringer- 2004 – online version: <a href="http://www.eurasyp.org/public/technique.home.screen">http://www.eurasyp.org/public/technique.home.screen</a>	Chemical & HPAEC-PAD	IV
All foods <sup>(1)</sup>	Fructo-oligosaccharides (monomeric units<5)	Ouamé et al. 1999 in <i>Complex Carbohydrates in Foods</i> . Edited by S. Sungsoo, L. Prosky & M. Dreher. Marcel Dekker Inc. New York	HPAEC-PAD	IV

1. Users

2. Two issues are left for national authorities to decide: (a) whether to include monomeric units 3-9 or not in the definition of dietary fiber and (b) which isolated or synthetic compound(s) have physiological benefit (Refer to GL 2-1985).

3. Quantification lost for resistant starch. Refer to specific methods.
4. Quantification lost for inulin, resistant starch

Other methods of analysis as referred to in Alinorm10/33/26 (CCNFSDU Report of 2 to 6 November 2009), Appendix II may be used subject to the requirements of the Regulations, particularly Regulation 51(10).

### **References**

1. Codex Alimentarius Report: CCNFSDU 3 to 7 November 2008: Alinorm 09/32/26, Appendix II (Step 8)
2. Codex Alimentarius Report: CCNFSDU 2 to 6 November 2009: Alinorm 10/33/26, Appendix II (step 8)
3. Nshida C, Martinez Nocito F, Mann J (Guest Editors). Joint FAO/WHO Scientific Update on Carbohydrates in Human Nutrition. European Journal of Clinical Nutrition(Supplement 1) 2007, 61: S19-S39

## GUIDELINE 2

### ALLERGEN RISK ANALYSIS AND ALLERGEN CONTROL POLICY (ACP)

#### ALLERGEN RISK ANALYSIS

The avoidance of the unintentional presence of allergens in food products requires an assessment of the likelihood of allergen cross-contamination throughout the supply chain, from raw materials through to the final product.

The allergen risk analysis should comprise the following four steps:

1. *Risk assessment* – what is the risk of unintentional presence of an allergen(s) in a foodstuff?
2. *Risk management* – can the risk be managed, and how will it be managed?
3. *Risk communication* – how will the risk be communicated?
4. *Risk review* – how is the risk monitored and has the risk changed?

#### GUIDELINES ON THE IMPLEMENTATION OF AN ALLERGEN CONTROL POLICY (ACP)

The following guidelines are proposed as a possible approach to allergen control for food manufacturers. Since many variations on it could achieve acceptable results based on a company's specific needs, these steps should not be considered a definitive protocol but rather an attempt to assist food manufacturers with some guidelines, specifically smaller manufacturers with little or no experience in these matters, to develop their own allergen control policy.

#### **4.1 ALLERGEN RISK ASSESSMENT**

An allergen risk assessment should form part of a food manufacturer's HACCP plan, and should assess whether specific food products intentionally contain an allergenic foodstuff, and whether there is the potential for allergen cross-contamination of other foods produced on the premises.

The first step in allergen control should be to identify all possible allergen sources and possible areas of allergen cross-contamination. These could include:

##### a) Raw materials:

- Ingredients
- Sub-ingredients, e.g. natural flavours, other allergen-derived additives or ingredients
- Reworked ingredients, e.g. peanut-containing biscuit dough re-worked into plain biscuit dough
- Processing aids, e.g. wheat starch
- Packaging materials, e.g. wheat derivative used in packaging material

b) Cross-contact: shared equipment, utensils, work surfaces, staff members.

#### **4.1.1. IDENTIFICATION OF HIDDEN ALLERGENS IN FOODSTUFFS**

##### **Label terminology that may indicate the presence of egg protein**

- \* Albumin
- \* Lysozyme
- \* Binder
- \* Ovalbumin
- \* Coagulant
- \* Ovomucin
- \* Emulsifier
- \* Ovomuoid
- \* Globulin
- \* Ovovitellin
- \* Lecithin
- \* Vitellin
- \* Livetin

##### **Label terminology that may indicate the presence of milk protein**

- \* Artificial butter flavour
- \* High protein flavour
- \* Butter
- \* Lactalbumin
- \* Butter fat
- \* Lactalbumin phosphate
- \* Buttermilk solids
- \* Lactose
- \* Caramel colour
- \* Milk derivate
- \* Caramel flavouring
- \* Casein
- \* Natural flavouring
- \* Caseinate
- \* Rennet casein
- \* Cheese
- \* Sour cream (or solids)
- \* Cream curds

- \* Sour milk solids
- \* De-lactosed whey
- \* Whey or whey powder
- \* Dry milk solids
- \* Whey protein concentrate
- \* Milk solids

**Label terminology that may indicate the presence of soy protein**

- \* Bulking agent
  - \* Emulsifier
  - \* Hydrolysed vegetable protein (HVP)
  - \* Lecithin#\*
  - \* Miso
  - \* MSG\*\*
  - \* Protein
  - \* Protein extended
  - \* Stabiliser
  - \* Textured vegetable protein (TVP)
  - \* Thickener
  - \* Tofu
  - \* Vegetable broth
  - \* Vegetable gum
  - \* Vegetable starch
- # Mostly produced from soy but may be manufactured from egg
- \*\* Sometimes produced from soy or wheat but now mostly by synthetic means

**Label terminology that may indicate the presence of wheat protein**

- \* All-purpose flour
- \* Bleached and unbleached flour
- \* Bulgur (cracked wheat)
- Bran
- \* Couscous
- \* Durum wheat/flour
- \* Enriched flour
- \* Farina
- \* Gelatinised starch# (or pre-gelatinised)
- \* Gluten or Vital gluten
- \* Graham flour
- \* High protein flour

- \* Kamut
- \* Malt
- \* Miller's bran
- \* Modified food starch or modified starch#
- \* Semolina
- \* Spelt
- \* Starch
- \* Vegetable gum#
- \* Vegetable starch#
- \* White flour

# May indicate the presence of soy protein or may be manufactured from cassava (tapioca), maize or rice.

## **4.2. ALLERGEN RISK MANAGEMENT**

### **4.2.1. Allergen control and pre-requisite programs (PRPs)**

When the following protocols are documented for a company's HACCP system, allergens must be kept in mind. This can assist with allergen control policymaking. The following should incorporate allergen control measures:

- Premises and equipment design for easy cleanup
- Sanitation in standard operating procedures
- Sanitation and control during receiving and storage
- Sanitation and control of distribution points
- Separate preparation areas
- Education/staff training
- Traceability protocols

### **4.2.2. Processing procedures**

The company should ensure that the correct processing methods/procedures are followed and should not allow allergen cross-contamination. This can be done by for example, manufacturing an "allergen-free" food and allergen containing food in separate areas of the factory or by making an allergen-containing product last in the production run.

### **4.2.3. Supplier control**

Specification sheets for each ingredient or additive should be drawn up to ensure an appropriate allergen control policy could be implemented.

#### **4.2.4. Supplier information questionnaires**

An allergen questionnaire should be drawn up and sent to all suppliers to complete containing, for example, a request for information on the following:

- Information on ingredients and additives supplied to the company. Do such ingredients contain allergens or additives derived from allergens?
- The allergen content of the raw ingredients/additives the supplier receives/uses.
- Does the supplier have an ACP in place?
- Does the ACP of the supplier consider allergen cross-contamination during:
  - Storage
  - Transport
  - Preparation
  - Cleaning
  - Shared production line or equipment
  - Rework

This is where the product information in terms of ingredients, additives, allergens and traceability, specifically the Supplier Ingredient Information files, as set out in Guideline 6 becomes essential. The information obtained from the questionnaire should be compiled into a Supplier Ingredient Information file for every ingredient or additive used in the manufacturing of a foodstuff by the specific company.

#### **4.2.5. Allergen audit**

An ACP audit, as part of the HACCP study, can identify possible problem areas and their potential severity. An allergen audit can be done in a similar way as a hygiene audit. The Regulations relating to the application of the Hazard Analysis and Critical Control Point System (HACCP system), No R.908 of 27 June 2003, published under the Act, can be used as a guideline, but applying the information to allergens. During an allergen audit all areas of manufacture must be inspected, for example, in the receiving area, it should be ensured that allergen containing foods or ingredients are stored separately or in airtight containers.

### **4.3. ALLERGEN RISK COMMUNICATION**

If a risk of allergen contamination is identified in a food manufacturing facility, this risk needs to be communicated. This communication needs to be directed towards employees (in order to reduce the risk), and to consumers (in order to afford protection from a potential allergic reaction).

#### **4.3.1 Employees**

All employees (including temporary employees and contractors) that handle ingredients, utensils, equipment, packaging and products should be aware of food allergens, the potential of allergen cross-contamination, and the consequences of ingestion by sensitive individuals.

- Procedures on the management of allergens should be available and/or posted wherever there is a risk for allergen cross-contamination
- Allergen awareness and management should form part of basic employee training, and should at least include :
  - Recognition of which ingredients are allergens of concern,
  - Identification of potential allergen cross-contamination situations,
  - Identification of dedicated equipment for the processing of allergenic ingredients,
  - Movement of equipment around the plant, e.g. maintenance tools, trays and utensils,
  - Effective hand washing,
  - Re-work procedures,
  - Waste management procedures,
  - Cleaning procedures.

#### **4.3.2. Communication to the consumer: Labelling and Packaging**

Regulations 43-47 detail the labelling regulations with regards to allergens.

##### **With regards to precautionary labelling:**

(a) Any foodstuff where there is a risk of cross-contamination with a common allergen should be labelled "not suitable for people with (allergen) allergy" in bold, legible letters in the same font as the rest of the letter size used for the list of ingredients, at the end or under the list of ingredients.

(b) In the case where an allergen control program is implemented and/or appropriate testing for the specific common allergens is carried out on a regular basis as referred to in this Guideline, and where allergen cross-contamination is still possible, the foodstuff should be labelled "may contain (allergen)", and may also be labelled with "allergen control program in place", in bold, legible letters in the same font as the rest of the letter size used for the list of ingredients, at the end or under the list of ingredients.

The reasons for the use of precautionary labelling statements as a risk management tool should be documented by the manufacturer/processor/importer.

If necessary, checks must be in place to ensure that the correct labels are placed on products and that they are packaged in the correct containers. There must also be no leaks in the packaging.

#### **4.4. RISK REVIEW**

##### **4.4.1. Allergen testing in the ACP**

Allergen testing is a useful tool for monitoring the effectiveness of the ACP in reducing the risk of allergen cross-contamination. Where a risk of allergen cross-contamination is identified, allergen testing should be part of the ongoing strategy for monitoring the risk of such contamination.

The risk of the unintentional presence of food allergens in a food product can be assessed using validated Enzyme Linked Immunosorbent Assay (ELISA) methods and/or Polymerase Chain Reaction (PCR) methods with the capacity to detect less than 10 mg/kg of a specific allergenic food.

##### **4.4.2. Sampling**

There are currently no guidelines indicating the size of the samples required for allergen testing. If a food manufacturer has testing protocols or sampling procedures in place, they can use these if they prefer. However, companies may consider the following when selecting the sample size:

- The size of the production run and number of batches
- Shared production lines and equipment between products containing allergens and so-called allergen-free products
- Any allergen control programme already in place
- Suspected contamination
- Consumer complaints

##### **4.4.3. Methods of analysis for gluten**

The recommended method for analysis of gluten is the Enzyme-Linked Immunoassay R5 Mendez (ELISA) Method as described in Codex Stan 118/1981, as revised in 2004 onwards.

##### **4.4.4. The role of allergen thresholds**

As individuals with food allergies differ in their degree of sensitivity to specific allergenic foods, attempts have been made to determine threshold doses for the major food allergens. The basic concept of establishing allergen thresholds is that if a Lowest Observed Adverse Effect Level (LOAEL) and No

Observed Adverse Effect Level (NOAEL) are identified, then the food industry could target their processes to achieve these levels.

The US FDA Threshold Working Group (2006) has summarised the available threshold data to report the following LOAELs for some of the common allergens (Table 1):

**Table 1** Summary of Published LOAELs for some common food allergens

<b>Food</b>	<b>Range of LOAEL (mg protein)</b>	<b>LOAEL expressed as ppm for a 100g serving of food</b>
Egg	0.13 – 1.0	1.3 – 10
Milk	0.36 – 3.6	3.6 – 36
Peanut	0.25 – 10	2.5 – 100
Tree Nuts	0.02 – 7.5	0.2 – 75
Fish	1 – 100	10 – 100
Soy	88 – 552	880 – 5520

It is important to note, however, that limited data is available on threshold levels for some common allergens, e.g. soy and fish. It is therefore likely that ongoing research may reduce these thresholds.

## GUIDELINE 3

### RULES ON QUANTITATIVE INGREDIENT DECLARATIONS (QUID)

#### 1. SCOPE OF QUID

The requirement to give QUID declarations will in principle apply to all food, including beverages, which contains more than one ingredient.

#### 2. WHEN QUID DECLARATIONS ARE NOT REQUIRED

(a) A QUID declaration will not apply to constituents which are naturally present in foods and which have not been added as ingredients. Examples are caffeine (in coffee), vitamins and minerals (in fruit juice).

(b) A QUID declaration will not apply to foods, which, although mentioned in the name of a food, have not been used in its manufacture or preparation. Examples are "Cream Crackers" – a customary name used to describe a dry biscuit which never contains cream, or "Lemon Creams" – another customary name used to describe a sweet biscuit which never contains cream or real lemons in any form, or chicken flavour crisps – where the chicken flavour comes from one or more ingredients which are not chicken, or cream of mushroom soup powder – a customary name for a soup powder which contains no cream and either a mushroom flavour and/or a very small amount of real mushroom and which has a smooth texture.

(c) A QUID declaration is not required for an ingredient/category of ingredient which, although it appears in the name of the food, is not likely to influence the customer's choice, because the variation in quantity is either not essential to characterise the food or does not distinguish it from similar foods, e.g., malt whisky or cornflakes.

(d) A QUID declaration is not required for an ingredient/category of ingredients which although it appears in the name of the food, has been used as a typical ingredient but in small quantities (less than 2%) mainly for the purpose of flavouring and of which consumers don't expect a high content of the ingredient(s) because of the nature of the product. An example is "Oxtail soup powder" which contains only a minute amount of dried meat.

(e) Although a QUID declaration is not a mandatory requirement for canned fish and marine products, canned meat, frozen fish and seafood products, agricultural fishery products and agricultural products for which compositional standards already exist under the National Regulator

for Compulsory Specifications Act, 2008 (Act 5 of 2008), and the Agricultural Products Standards Act, 1990 (Act 119 of 1990), and the Liquor Products Act, 1989 (Act No. 60 of 1989), it is nevertheless highly recommended in the interest of transparency in consumer information.

(f) A QUID declaration is not required for canned products, which declare both the drained net weight and the net weight on the label, because the QUID can be calculated from the weight indications already given. Examples include -

- \* a single type of fruit in juice;
- \* a single type of vegetable in water; and
- \* mixtures of vegetables/fruit in water/juice where no ingredient in the mixture significantly predominates by weight.

The exemption does not apply if, on mixed ingredients products, one or more ingredient(s) is / are either emphasised in some way on the label or predominates by weight, because the amount of the ingredient can then not be calculated from the weight indications already given.

(g) In the case of mixtures of fruit or vegetables or nuts, etc, referred to in regulations 16, 17, 19, 20 and 21 where no ingredient in the relevant mixture predominates significantly by weight, a QUID declaration would not be required.

(h) Subject to regulation 17 an additional QUID declaration will not in addition be required for the sweetening agent as a result of the indication "with sweetener(s)" or "sweetened with...".

(i) A QUID declaration will not be required for vitamins and/or minerals that are added to foodstuffs for enrichment or fortification purposes, as their content will be indicated in the nutritional information table.

(j) A QUID declaration will not be required for an ingredient or category of ingredients that is used in small quantities for the sole purpose of flavouring, provided that section 5 of the Act (concerning false or misleading descriptions) is not infringed in any manner. This exemption applies to flavourants, such as quinine in tonic water, which are additives, and garlic and other herbs and spices.

(k) A QUID declaration should not be confused with nutritional information labelling and does not replace the nutritional information table.

(l) A QUID declaration is not required for single ingredient foodstuffs.

(m) A QUID declaration is not required for a foodstuff with more than one ingredient, where the emphasised ingredient is the main ingoing ingredient and appears in the name of the product and

comprises 95% or more of the mixture at the time of manufacture.

### 3. WHEN QUID DECLARATIONS ARE REQUIRED

<p>(a) Where the emphasised ingredient or category of ingredients -</p> <p style="padding-left: 40px;">(i) appears in the name of the food; and</p> <p style="padding-left: 40px;">(ii) is usually associated with that name by the consumer:</p>
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(i) The first part of this provision would require a QUID declaration where the ingredient or category of ingredients appears in the name of the food -

(aa)

The ingredient is included in the name of the food	Examples* would include
	<p>“<u>Chicken</u> and <u>mushroom</u> pie”,</p> <p>“<u>chicken</u> polony”,</p> <p>“<u>olive oil</u> margarine”,</p> <p><u>tomato</u> sauce”, “<u>honey</u> and <u>oats</u> biscuits,</p> <p>“<u>banana</u> loaf”,</p>

\* In the abovementioned examples it is the ingredients underlined which would require quantification.

(bb)

The category of ingredients is included in the name of the food	Examples** are:
	<p>“vegetable/fruit pie”, “nut loaf”</p>

\*\* In the abovementioned examples the QUID declaration need only relate to the total vegetable, fruit or nut content of the product.

(cc) When the name of a compound ingredient appears in the name of the food, it is the compound ingredient, which would require quantification. Examples are “seafood lasagne”

or “biscuits with a cream filling”. If an ingredient of the compound ingredient is also mentioned, e.g., “seafood lasagne with prawns” and “biscuits with a cream filling containing eggs”, it should also be quantified.

(ii) The second part of this provision would require a QUID declaration on products where the ingredient or category of ingredients is usually associated with the name of the food. This is most likely to apply when products are described by the use of customary names without additional descriptive names.

As a guide for deciding which ingredients might usually be associated with a product identified by a customary name alone, it might prove helpful to consider what an appropriate descriptive name for the product might be, were this to be given. QUID should then be applied to the main or prominent ingredients identified, provided they do not qualify for exemption from QUID. For illustrative purposes only the following examples are given:

Product	Example of description	QUID for
“Cottage Pie”	Minced beef topped with mashed potatoes	Minced beef

The intention is not that all ingredients associated by the consumer with a particular product name should require a QUID declaration under this part of this provision, or that each name under which a food is sold is ultimately linked to a specific ingredient requiring a QUID declaration. For example, “cider” would not require a QUID declaration for apples, nor “crisps” a QUID declaration for potato. Although this provision does not impose an automatic obligation to indicate the quantity of meat for “ham”, a QUID declaration will be required for all hams, other processed meats and fresh meats that contain added, injected water, or injected water-additives mixtures. Only a very limited number of products which have been dried or dry-cured and have a meat content significantly in excess of 100% (e.g. Parma ham, Serrano ham, Jambon de Bayonne) will not require a QUID declaration.

(b) Where the ingredient or category of ingredients is emphasised on the labelling in words, pictures or graphics.

(i) This requirement is likely to be triggered when a particular ingredient is given emphasis on the label otherwise than in the name of the food. For example by means of flashes such as

- 
- \* “with extra chicken”
- \* “made with butter”

\* “with real Cheddar cheese”

or by the use of different size, colour and/or style of lettering to refer to particular ingredients anywhere on the label other than in the name of the food.

(ii) When pictorial representation is used to emphasise selectively one or a few ingredients, for example, fish casserole with a prominent picture or illustration of only a selection of the fish ingredients. However, this emphasis provision may not be triggered by the following:

- (aa) When a pictorial representation of a food as offered for sale is given;
- (bb) when a pictorial representation takes the form of a “serving suggestion”;
- (cc) when a pictorial representation is descriptive of the agricultural origin of certain ingredients without emphasising the quantity of the ingredients concerned (e.g., a picture of wheat or hops on a beer label);
- (dd) when a pictorial representation presents all the food ingredients (with the exception of minor ingredients such as seasonings and additives) without emphasising any particular one;
- (ee) in the case of warnings aimed at allergy sufferers (e.g., a warning statement about the presence of nuts in a product); and
- (ff) in the case of a food mix, a pictorial representation of what should be made from the product, having regard to the instruction given.

(c) Ingredients used in concentrated or dehydrated form, which are reconstituted during manufacture.

Regulation 21 permits ingredients used in concentrated or rehydrated form which are reconstituted at the time of manufacture to have their order in the ingredients list determined as if they had been used as “whole” ingredients (e.g., reconstituted dried skimmed milk used in a milk pudding or dairy dessert). This same principle applies to the QUID declaration, which may be based on the weight of the “whole” ingredient.

#### 4. EXPRESSION OF QUANTITY

(a) Foods in general:

- (i) The quantity of an ingredient or category of ingredients should generally be expressed as a percentage. The percentage may be rounded to the nearest whole number, or in those cases where it is below 5%, to the nearest 0,5 decimal place.
- (ii) The percentage should normally be calculated by using the same method as that used for determining the order in the list of ingredients. This means that the weight of an ingredient to be quantified would need to be divided by the total weight of all

of the ingoing ingredients (except the weight of any added water or volatile ingredients lost in processing). For example, the fish content of a “fish finger” would be calculated as follows:

Ingredients	Weight	Formula
		$\frac{70}{112} \times 100 = 62,5 \%$
Fish	70 g	
Batter	20 g	
Crumb	20 g	
Total before frying	110 g	
Frying oil taken up	7 g	
Total mixing bowl	117 g	
Water lost from batter during	-5 g	
frying	112 g	
Total of ingredients		

However, care should be taken to ensure that the figure quoted is that which best represents the amount of the ingredient, or category of ingredients, at the time of use in the preparation of the food. Manufacturers should control process variability in accordance with good manufacturing practice in order to ensure that, as far as is practicable, individual consumers are not misled.

- (iii) QUID declarations should relate to the ingredient as identified in the list of ingredients. Ingredients identified, for example, as “chicken”, “milk”, “egg”, or “banana”, should be quantified as raw/whole, as the names used imply use of the basic food because they carry no indication that they have been processed. Ingredients identified by names, which indicate they have been used other than in their raw/whole form, e.g., “roast chicken”, “skimmed milk”, “crystallised fruit”, should be quantified as used. Dedarations of processed ingredients may be supplemented with “raw equivalent” dedarations since this would help consumers compare similar products which have used ingredients in different forms. Where dedarations for ingredients of compound ingredients are required, these may relate to the ingredient either as a percentage of the compound ingredient or as a percentage of the food. The basis of the declaration should be made clear to the consumer and should be consistent with the method used for ingredient listing.

(b) Foods which lose moisture following heat or other treatment

QUID declarations on products (such as cakes, biscuits, pies and cured meats) the composition of which has been changed by cooking or other treatments involving loss of moisture should be based on the amount of the ingoing ingredient expressed as a percentage of the weight of the final product. For example, the butter content of a “butter cookie” would be calculated as follows:

<b>Ingredients</b>	<b>Weight</b>	<b>Formula</b> <b><math>50 \times 100 =</math></b> <b>29.6%</b> <b>169</b>
Flour	100 g	
Sugar	35 g	
Butter	50 g	
Eggs	10 g	
Total mixing bowl	195 g	
Total after baking	169 g	

Where this calculation would lead to declarations exceeding 100%, the declarations should be replaced with statements giving the amount of the ingredients used to make 100 g/ml of the final product (e.g., “made with X g/ml of Y per 100 g/ml”). Concentrated or dehydrated products intended to be reconstituted before consumption otherwise covered by this provision may alternatively follow the provision described in the paragraph 4 (c) (i) below.

(c) Foods sold in concentrated or dehydrated form which are intended to be reconstituted using water by the consumer before consumption:

- (i) QUID declarations on concentrated or dehydrated products intended to be reconstituted before consumption (including dry mixes for cakes and desserts) may relate to the ingredients in the reconstituted product if the ingredient listing information is also given on this basis. Although the provision applies to products that are intended to be reconstituted by the addition of water, a similar approach may also be used for those products, which are intended to (or which may optionally) be reconstituted by the addition of other liquids (e.g., milk or stock) if the ingredient listing information is also given on this basis.
- (ii) In deciding whether to give ingredient listing and QUID information based either on the dehydrated or reconstituted product, consideration should be given to avoiding

giving QUID and any nutrition labelling information for industry sectors, to ensure that a common practice is adopted for all similar products, to enable consumers to make appropriate comparisons.

## GUIDELINE 4

### 1. LIST OF CATEGORY NAMES UNDER THE AGRICULTURAL PRODUCTS STANDARDS ACT, 1990 (ACT 119 OF 1990) AND THE STANDARDS ACT, 1990 (ACT 29 OF 1993) IN WHICH THE WORD “REDUCED” OR “LIGHT” OR ANY OTHER WORD INDICATIVE OF A COMPARATIVE OR A NUTRIENT CONTENT CLAIM APPEARS, WHICH IS NOT REGARDED AS A COMPARATIVE OR NUTRIENT CONTENT CLAIM

- **Extra** fruit jam
- **Reduced** sugar jam
- **Extra** fruit jelly
- **Reduced** sugar jelly
- **Reduced** sugar marmalade
- **Reduced** oil mayonnaise
- **Reduced oil** salad cream
- **Reduced oil** salad dressing
- **Oil-free** salad dressing
- **Light** tuna (referring to the colour of the meat)

### 2. CALCULATION OF THE COMPARISON WHICH SHALL BE BASED ON A RELATIVE DIFFERENCE OF AT LEAST 25% IN THE ENERGY VALUE OR NUTRIENT CONTENT OR ALCOHOL CONTENT OF AN EQUIVALENT MASS OR VOLUME.

#### Example 1:

Regular food contains 5 grams of fat; “Lite” food contains 3.8 grams of fat.

$$5 \text{ g} - 3.8 \text{ g} = 1.2 \text{ g}$$

$$(1.2 \text{ g} / 5 \text{ g}) \times 100 = 24 \% \text{ difference}$$

Conclusion: A comparative claim is not permitted.

#### Example 2:

Regular food contains 150 kilojoules; “Reduced” food contains 100 kilojoules.

$$150 \text{ kJ} - 100 \text{ kJ} = 50 \text{ kJ}$$

$$(50 \text{ kJ} / 150 \text{ kJ}) \times 100 = 33 \% \text{ difference}$$

Conclusion: A comparative claim is permitted.

## GUIDELINE 5

### SAMPLING PROCEDURE FOR THE PURPOSES OF GENERATING NUTRITION DATA BY ANALYSIS AND VERIFICATION

The best practice process of selecting the sample to be sent for analysis is a **random**<sup>a</sup> one. However, there are two alternative types of sample selection processes that may also be used and that are considered acceptable. The decision to use one of these alternative methods will be based on the belief that they provide data of greater accuracy for the average product in question. The first is when a **representative**<sup>b</sup> sample is taken and the second situation is where a **stratified**<sup>c</sup> sample is used.

Other sampling methods, such as those based on **selective**<sup>d</sup> or **convenience**<sup>e</sup> sampling methods are not acceptable.

#### 1. Definitions

(a) **“Random”** samples are preferred as all products have an equal chance of selection and there is no bias in sampling. Consideration is given to representative and stratified methods of sampling, as it is acknowledged that some circumstances may require this in order to give a more representative average for nutritional data.

(b) **“Representative”** samples result from a sample plan that can be expected to reflect adequately the properties of interest of the parent population. An example would be a flaked cereal with multiple ingredients, such as dried fruit with more than one type of flaked grain, where a formulation-based proportion sample is prepared. This sample would then be representative of the formulated breakfast cereal, which may not always have the exact proportions in every box coming off the production line. This may allow the reporting of data on carbohydrates to reflect the ideal contributions made from ingredients, as opposed to random samples taken where the fruit content was not as per formulation and may give lower sugar values.

(c) **“Stratified”** samples consist of portions taken from identical subparts of the parent population. Within each subpart, however, the samples are taken randomly. An example would be in the analysis of the protein fractions of oats, where there are seasonal variations. The parent population in this case would be the oat crop over the past 12 months, the subparts could be the months making up each of the four seasons. The selection of a sample from each of those four seasons, however, would need to be totally random. This would permit the protein value to accurately reflect the seasonal variation of the product, as opposed to a random sample that may be drawn in one particular season.

(d.) **“Selective”** samples are deliberately chosen by using a sampling plan that screens out materials with certain characteristics and/or selects only material with other relevant characteristics.

(e) **“Convenience”** samples are chosen on the basis of accessibility, expediency, cost, efficiency or other reasons not directly concerned with sampling parameters.

**2. Number of samples required for submission to the analytical laboratory**

(a) For products of relative homogenous composition a minimum of three (3) samples from different batches according to the specific, relevant sampling plan (e.g., random sampling, stratified sampling or representative sampling) shall be taken. An example is e.g., pasta etc.

(b) For more variable non-homogenous products, primary produce or prepared foodstuffs, a minimum of twelve (12) samples from various batches according to the specific, relevant sampling plan (e.g., random sampling, stratified sampling or representative sampling) shall be taken. Examples are margarine, muesli, composite cereals, ready-to-eat meals etc.

(c) Individual samples shall be collected from the final packaging line and stored appropriately (see guidelines under Handling) until the required number of samples have been collected to submit to the laboratory for analysis.

**3. Preparation of composite sample that is used for analysis (to be done by the laboratory)**

The laboratory shall -

- (i.) include in the laboratory analysis report the following information:
  - o Number of samples;
  - o product name;
  - o batch numbers;
  - o barcode if available; and
  - o date of manufacture or a date of durability where a date of manufacture is not available, of each sample submitted;
- (ii.) prepare a composite sample from all the samples for analysis by drawing equal portions (minimum portion is 100 g) from each sample;
- (iii.) analyse the composite sample in duplicate and take the mean of the two analysis figures as the final result: Provided that neither result shall deviate by more than the applicable values as indicated in the Table below:

**Table: Recommended Tolerances for Nutrient Declaration in Nutrition Labelling**

For naturally occurring vitamins	+50 -30% Vit C: +75 -30%
For added vitamins	+75 -20% Vit C: +150 -20%
For naturally occurring minerals	+40 -30%
For added minerals	+50 -20% Sodium: ±20%
Protein Carbohydrate Fat Sugars Fiber Sodium	Protein, Carbohydrates: <10 g/100g: ±2 g ≥10 g/100g: ±25%  Sugars, Fiber: <8 g/100g: ±1,5% ≥8-10 g /100g: ±20%

	$\geq 10 \text{ g}/100\text{g}: \pm 20\%$  Fat: $< 3 \text{ g}/100\text{g}: \pm 1,5 \text{ g}$ $\geq 3 \text{ g and } < 10\text{g}/100\text{g}: \pm 2,5 \text{ g}$ $\geq 10 \text{ g}/100\text{g}: \pm 25\%$  Sodium: $\pm 20\%$
Fatty acids (sum of SFAs, MUFAs, PUFAs)	$\leq 5 \text{ g}/100\text{g}: \pm 1 \text{ g}$ $5 - 40 \text{ g} / 100 \text{ g}: \pm 15\%$ $\geq 40 \text{ g} / 100\text{g}: \pm 8 \text{ g}$
Cholesterol	$\pm 20\%$

#### 4. Handling

All due care shall be taken to ensure the stability of nutrients and to reduce the risk of contamination when selecting samples and sending them to the laboratory for analysis. "All due care" refers to consideration being given to the need for samples to be protected from light, oxygen, temperature, humidity, microbiological spoilage, moisture loss or gain or cross contamination. Not all factors may require action, but they should all be uniformly considered when preparing a sample to go to the laboratory.

#### 5. Verification (claim versus no claim)

##### (a.) Claims

When making a claim, ongoing verification by analysis is required.

(i) An audit system shall be implemented by the manufacturer for all of the quantitative nutritional claims made and quantitative nutritional information required to substantiate these claims. Claims shall be verified by analysis in such a manner that each nutrient concerned shall be analysed every three (3) years.

(ii) However, for a newly introduced product the analysis required for full quantitative verification of all claims shall be completed within 12 months of the product being made available for sale, after which the audit requirement mentioned above shall come into effect.

(iii) When any change in the product formulation is made the procedure in paragraph (i) shall apply.

(iv) Where a claim is made for a range of products which, in terms of nutritional composition, can be expected to be identical (e.g., different flavours of a soft drink with a common base formulation), only a single product from the range would need verification.

##### (b) No claims

Where nutritional information is not obtained from the MRC Food Composition Tables or another reputable international database, the nutritional information for products that do not carry any claims but that indicate such information on the label should be verified every three (3) years.

## GUIDELINE 6

### PRODUCT INFORMATION IN TERMS OF INGREDIENT/ADDITIVES TRACEABILITY

Use the TAB key to work through this document electronically. Click once in the check box (or hit the 'space' bar) for the cross to appear  or to insert text.

#### PRODUCT & CONTACT DETAILS

<b>Customer's Product Name</b>		<b>Customer's Product Code</b>	
<b>Supplier's Product Name</b>		<b>Supplier's Product Code</b>	

Status	<input type="checkbox"/> Existing Product	<input type="checkbox"/> New Product
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#### Supplier Information

Company Name	
Trading Name	
Business Address	
Postal Address	
Technical Contact Person	
Position Title	
Phone	
Fax	
Cell phone (mobile)	
Email	

#### Manufacturer(s) or Producer(s) Information

*(Complete only when manufacturer or producer is different to supplier, e.g. bought from distributor or agent. List all alternative sources or suppliers.)*

<b>Company Name</b>	<b>Site of Manufacture or production (City &amp; Country)</b>

#### Clarity / explanation

Additive numbers refer to the reference number as per Codex and/or European Union and/or FSANZ – all use the same reference number except the EU includes an E prefix.

#### Checklist

- All sections of questionnaire complete
- Page 2 has been signed and dated**
- Supplier Test Results (COA) attached – if applicable (Refer Page 15)
- Current Halaal Certificate attached – if applicable (Refer Page 11)
- Current Kosher Certificate attached – if applicable (Refer Page 11)
- Other associated documents as requested by the customer attached (Refer customer's covering letter or request)
  
- MSC / Other

- Organic certification
- Hygiene Audit (or equivalent, e.g. FSIS/BRC/M&S/Global GAP)
- HACCP / Food Safety Certification

Supplier Declaration and Warranty

The Supplier –

- Certifies that this product complies with all relevant South African legislation;
- Acknowledges that the Customer, and Supply Chain Customers of the Customer, will rely on the accuracy of the Product Information for food quality, safety and labelling purposes, and that errors or omissions in the above information may cause significant loss and damage;
- Certifies that the Product information contained herein is true and accurate to the following degree-
  - o That the Product Information in relation to ingredients that it buys in from a third party relies in good faith on Product Information provided by that third party and attached to this declaration;
  - o That the information is unconditionally true and accurate in relation to all other substances and processes;
- Agrees that all Product it supplies to the Customer will conform with the Product Information unless otherwise agreed to in writing and in advance by the Customer;
- Will immediately inform the Customer (and confirm in writing as soon as possible) if it becomes aware of any error or omission in the Product Information;
- Will inform the Customer in writing and in advance of any change to the Product Information provided herein; and
- Acknowledges that the Customer may provide the Product Information to third parties.

Click on the "COMPANY NAME" field to continue inserting information

<b>Company Name</b> (Signed for and on behalf of)	
<b>Name (please print)</b>	
<b>Job Title</b>	
<b>Authorised Signature</b>	
<b>Date</b>	

Click on the field name '2.1 PRODUCT DESCRIPTION' to continue to table through the document

Customer Internal Use Only	
<b>Internal Product Code / Description</b>	
<b>Internal Supplier Code / Description</b>	
<b>Version No.</b>	

Approved	<input type="checkbox"/> Yes <input type="checkbox"/> No
Additional Information Required	
Received and Reviewed by	
Date	
Signature	

**PRODUCT INFORMATION & INGREDIENTS**

**Product Description**

Physical and technological description

Legal Description / Suggested Labelling Description

**Ingredient Declaration including QUID**

*(Full list of ingredients including food additives in descending order, including percentage labelling of characterising components or ingredients [QUID declaration], and full break down of compound ingredients. Ensure all relevant information such as additive numbers are included.)*

**Processing Aids**

*(Full list of processing aids used in the manufacture of this product and not declared in the ingredient listing – e.g. carriers / anti foam / divider oil / etc.)*

**Country of Origin**

Statement (Select 1 option only)		Insert Country Below		Specify % Imported Ingredients	Specify Country / IES of Imported Ingredients
<input type="checkbox"/>	Produce of				
<input type="checkbox"/>	Made in				
<input type="checkbox"/>	Made in		From local and imported		

			ingredients		
<input type="checkbox"/>	Other – specify				

**Component country of origin**

*(List all ingredients in descending order and Indicate all countries from which ingredient can be sourced)*

Ingredient	Country of origin

**allergen & compositional information**

**Mandatory Advisory or Warning Statements and Declarations**

*(A Yes response triggers an advisory or warning statement.)*

Food / Component	Present Yes / No
Aspartame	
Glutamates (MSG)	
Tartrazine	
Phytosterol esters / stanols	
More than 10 % of final product irradiated	
Herbal and botanical extracts <i>If 'yes' please specify</i>	
Isomaltulose	
Polyols, Isomalts, Polydextrose (Lactitol, Maltitol, Maltitol syrup, Mannitol, Xylitol, Erythritol, Isomalt, Polydextrose, Sorbitol). <i>If 'yes' please specify type/s and levels</i>	
<b>Type</b>	<b>Level (g/100g)</b>

**Mandatory Declaration of certain substances**

*Please insert YES **OR** NO to indicate if the product contains any ingredient, additive or processing aid which has been derived from the food source.*

*All responses trigger additional information. Ensure Cross Contact Details are complete.*

<b>Food</b>	<b>Yes*/</b>		<b>Cross Contact Details</b>
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	No	*If Yes, additional information must be inserted where prompted	Present on same line Yes/No	Present in same Facility Yes/No
Cereals containing gluten & their products namely, wheat, rye, barley, oats, spelt & their hybridised strains		Specify name of cereal and type of derivative/s:		
		Has the product been rendered gluten free by processing (no detectable gluten)? Yes / No		
		Has the product been rendered free of all wheat proteins by processing? Yes / No		
Crustacea & crustacea products (shrimp, prawn, crab, lobster and crawfish or crayfish)		Specify name (common & scientific) of Crustacea and type of derivative/s:		

Food	Yes*/ No	*If Yes, additional information must be inserted where prompted	Cross Contact Details	
			Present on same line Yes/No	Present in same Facility Yes/No
Molluscs & mollusc products ( abalone or perlemoen, calamari, clams, cockles, mussels, oysters, scallops, whelks, winkles)		Specify name (common & scientific) of Molluscs and type of derivative/s:		
Egg & egg products		Specify type of egg derivative/s:		
Fish & fish products (Including fish oils)		Specify name (common & scientific) of fish and type of derivative/s:		
Milk & milk products		Specify type of milk derivative/s:		
Peanuts & peanut products (including peanut oil)		Specify type of peanut derivative/s:		
Soybeans & their products (including soybean oils)		Specify type of soybean derivative/s:		
Tree nuts & their products (excluding coconut & pine nut)		Specify name/s of tree nuts and type of derivative/s:		

Sulphites		Total level of sulphites in product (mg/kg):			
		Total level of added sulphites in product (mg/kg):			
		Specify type of added sulphite/s and additive number/s			

### Allergen Cross Contact

Has your company addressed the issue of cross contact from allergen causing components?

<input type="checkbox"/> Yes	<p>How is cross contact of allergens avoided?</p> <p><input type="checkbox"/> validated cleaning procedures swabs/visual/Elisa <span style="margin-left: 200px;"><input type="checkbox"/> production scheduling</span></p> <p><input type="checkbox"/> control of personnel movement in factory <span style="margin-left: 50px;"><input type="checkbox"/> staff training</span></p> <p><input type="checkbox"/> documented procedures and controls <span style="margin-left: 150px;"><input type="checkbox"/> isolated storage of allergens</span></p> <p><input type="checkbox"/> other</p>
<input type="checkbox"/> No	<p>Does your company handle, process or have onsite any allergen causing components?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p>If YES by what date do you plan to have addressed the issue of allergen cross contact within your manufacturing premises?</p>

### Additional Consumer Information Requirements

Indicate if the product contains or is manufactured from any of the following

Food / Component	Yes* /No	*If YES additional information must be inserted where prompted
Beef (or bovine)		Specify type/s of beef (or bovine) derivative/s:
		Does the cattle feed exclude animal derived products?
		Is growth hormones used?
		Specify country/ies of origin:
Chicken		Specify type/s of chicken derivative/s:
		Does the chicken feed exclude animal derived products?
		Is routine antibiotics used as a growth promoter during the chicken production?

Food / Component		Yes* /No	*If YES additional information must be inserted where prompted	
			Specify source of chicken products (i.e. country and city):	
Pork			Specify type/s of pork derivative/s:	
			Does the pig feed exclude animal derived products?	
			Specify country/ies of origin:	
Gelatine			Specify name, type & Halaal status:	
Eggs			Liquid egg <input type="checkbox"/>	Shell egg <input type="checkbox"/>
			Free range <input type="checkbox"/>	Barn / cage <input type="checkbox"/>
			Pasteurised <input type="checkbox"/>	Other
Fruit and vegetables			Used unpeeled <input type="checkbox"/> Waxed <input type="checkbox"/>	
Milk and milk products			Is rBST used to produce the milk?	
Antioxidants	Added BHA			
	Added BHT			
	Added TBHQ			
	Other Antioxidants		Specify Antioxidant/s:	
Flavour Enhancers			Specify flavour enhancer/s and additive number/s:	
Alcohol (Residual)			Specify level % v/v:	
Added Fats & Oils	Animal		Specify type of fats & oils:	
			If applicable specify the name of any process used to alter the fatty acid composition:	
	Vegetable		Specify types of fats & oils:	
			If applicable specify the name of any process used to alter the fatty acid composition:	
Allium Genus (Onion, garlic, spring onion, leek, chives etc.)			Specify name and type of derivative/s:	
Sweeteners (intense, non-nutritive)			Specify types of intense sweetener/s and additive number/s:	
Preservatives			Specify type/s of preservative/s, additive number/s and level/s in mg/kg:	
Seeds (sunflower, poppy, cottonseed, etc.)			Specify name and type of derivative/s:	
Yeast & Yeast Products (including yeast extracts)			Specify type of yeast product/s:	
Herbs			Specify name of herb/s:	
			Irradiated <input type="checkbox"/>	

Food / Component	Yes* /No	*If YES additional information must be inserted where prompted	
		<input type="checkbox"/> Herb	<input type="checkbox"/> Herb oil / extracts/ oleoresins
Spices		Specify name of spice/s:	
		Irradiated <input type="checkbox"/>	
		<input type="checkbox"/> Spice	<input type="checkbox"/> Spice oil / extracts/ oleoresins
Hydrolysed Vegetable Proteins		Specify type/s of protein sources (e.g. maize or soya):	
Added Flavourants (If the product is a flavour, answer YES)		Specify type of flavour/s:	
		<input type="checkbox"/> Natural <input type="checkbox"/> Natural Identical <input type="checkbox"/> Artificial	
Added Colourants (If the product is a colour, answer YES)		Specify Type/s	Specify Name and Additive number/s
		<input type="checkbox"/> Natural	
		<input type="checkbox"/> Artificial	
		<input type="checkbox"/> Azo dye	
		<input type="checkbox"/> Not Defined	
Added Salt (If the product is salt, answer YES)		Specify type of salt (e.g. sea, mined, etc.)	
		Is salt iodated according to SA legal requirements?	
Added Sugar (If the product is sugar, answer YES)		Specify type of sugar	
Honey & Honey products		Specify type/s of honey or honey derivative/s:	
		<input type="checkbox"/> Badger Friendly	<input type="checkbox"/> Irradiated
		<input type="checkbox"/> Antibiotics used	
		Country of origin?	

### NUTRITION INFORMATION & DIETARY SUITABILITY

Nutrition Information – Nutrients highlighted in **BOLD** must be completed.

Nutrient	Average Quantity per 100	<input type="checkbox"/> mL SG =	<input type="checkbox"/> g
Moisture	g		
Total Ash	g		
<b>Energy</b>	kJ		
<b>Protein</b>	g		
<b>Carbohydrate</b>	g		
• <b>Sugars</b>	g		

Nutrient	Average Quantity per 100	<input type="checkbox"/> mL SG =	<input type="checkbox"/> g
<b>Fat, total</b>	g		
• <b>Saturated</b>	g		
• <b>Monounsaturated</b>	g		
• <b>Polyunsaturated</b>	g		
• <b>Trans fatty acids</b>	g		
<b>Cholesterol</b>	mg		
<b>Dietary fibre, total</b>	g		
<b>Sodium</b>	mg		
Vitamins – insert information on additional vitamins	mg		
Minerals – insert information on additional minerals	mg		
Insert any other nutrient or biologically active substance	mg		

Nutrition Information based on – *mark boxes as appropriate*

<input type="checkbox"/> 100 g Drained Product	<input type="checkbox"/> 100 g Un-drained Product	<input type="checkbox"/> 100 g De-glazed weight
<input type="checkbox"/> Not Applicable		

<input type="checkbox"/> 100 g Uncooked Product	<input type="checkbox"/> 100 g Product cooked / reconstituted in accordance with directions
<input type="checkbox"/> Not Applicable	

Rehydration Rate:
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Carbohydrate has been determined by:

<input type="checkbox"/> Difference	<input type="checkbox"/> Available Carbohydrate	<input type="checkbox"/> Other – Specify
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Data Source

<input type="checkbox"/> Analysed – i.e. Laboratory Tested	Lab Name	Accreditation
Date Tested		
<input type="checkbox"/> Reference tables – e.g. MRC Food Finder, USDA <b>Please specify the source</b>		

Dietary Suitability

	Yes* / No	* If YES, additional information must be inserted where prompted
Vegan Suitable (NO meat, milk, eggs, honey)		
Lacto Vegetarian Suitable		

	Yes* / No	* If YES, additional information must be inserted where prompted
(contains milk)		
Ovo Vegetarian Suitable (contains egg)		
Ovo Lacto Vegetarian Suitable (contains milk and egg)		
Halaal Suitable		Is this product Halaal certified? <input type="checkbox"/> Yes – attach copy of valid certification <input type="checkbox"/> No
Kosher Suitable		Is this product Kosher certified? <input type="checkbox"/> Yes – attach copy of valid certification <input type="checkbox"/> No
Organic Certified		Is this product Organic certified? <input type="checkbox"/> Yes – attach copy of valid certification <input type="checkbox"/> No
Hindu Suitable (contains NO beef)		Is product certified? <input type="checkbox"/> Yes – attach copy of valid certification <input type="checkbox"/> No

**OTHER**

**Food Irradiation / Sterilisation / Microbial reduction steps**

Has this product or any of its components been treated with:	Yes* / No	* If YES, additional information must be inserted where prompted
Microbial reduction heating		Specify time and temperature:
Steam Sterilisation		Specify treated ingredient/s:
Ionising Radiation		Specify treated ingredient/s:
Ethylene Oxide		Specify treated ingredient/s:
Other fumigants or sterilants		Specify fumigant/s or sterilant/s:
		Specify treated ingredients:

**Contaminants & Residues (Pesticides / Heavy metals / Veterinary residues / Marine biotoxins, etc.)**

<b>This product complies with:</b>	<b>Yes / No</b>
R.246 of 11 February 1994: <i>Regulations governing the maximum limits for <b>pesticide residues</b> that may be present in foodstuffs</i>	
R.1809 of 3 July 1992: <i>Regulations governing the maximum limits for <b>veterinary medicine and stock remedy residues</b> that may be present in foodstuffs</i>	
R.500 of 30 April 2004: <i>Regulations relating to Maximum Levels for <b>Metals</b> in Foodstuffs</i>	
R.491 of 27 May 2005: <i>Regulations relating to <b>Marine Biotoxins</b></i>	
R.1145 of 8 October 2004: <i>Regulations governing tolerances for <b>fungus-produced toxins</b> in foodstuffs (mycotoxins)</i>	
R.911 of 28 September 2001: <i>Regulations governing <b>certain solvents</b> in foodstuffs (benzene and methanol)</i>	

**Food Produced using Gene Technology**

**Q1** Are there any ingredients in this product (including food additives, processing aids and enzymes) which contain or have been derived from genetically modified material or have been produced using the application either directly or indirectly of genetically modified substrates or genetically modified organisms?

- Yes       May contain       No – Go to Section 6

**Q2** Does this product require labelling in accordance with R.25 of 16 January 2004: *Regulations relating to the Labelling of Foodstuffs obtained through Certain Techniques of Genetic Modification?*

- Yes       No

**Q3** This product:

- Does not contain genetically modified novel DNA and/or novel protein
- Contains or  May contain genetically modified novel DNA and/or novel protein exempt from labelling
- Contains or  May contain genetically modified novel DNA and/or novel protein which requires labelling

**Q4** Do any of the genetically modified components of this product have altered characteristics?

- Yes       No

If 'YES' list the GM components and altered characteristics:

<b>GM Component</b>	<b>Altered Characteristics</b>

**Q5 The genetically modified components of this product are classified as (*select appropriate box*):**

- Genetically modified food – containing novel DNA and/or novel protein
- Genetically modified food – highly refined to remove novel DNA and/or novel protein
- Genetically modified food additives or processing aids where novel DNA and/or novel protein is present
- Genetically modified food additives or processing aids where novel DNA and/or novel protein is not present
- Enzymes originating from genetically modified organisms where no novel DNA and/or novel protein is present
- Other – specify

**PREPARATION, STORAGE PACKAGING & CODING INFORMATION**

**Storage & Transportation**

<b>Recommended Storage Conditions</b>	Unopened	
	Opened	
<b>Shelf Life</b>	Unopened	
	Opened	
<b>Recommended Transportation Requirements</b>		

**Packaging**

<b>Pack Size – Net Weight or Net Volume</b>	
<b>Target Fill Weight (<i>If applicable</i>)</b>	
<b>Drained Weight (<i>If applicable</i>)</b>	
<b>Deglazed</b>	

Packaging	Unit	Agent or distributor ( <i>If applicable</i> )
Pack Type		
Sealing Method		
Tamper Evidence		
General packaging Requirements		

Is product double bagged? <input type="checkbox"/>
What is the colour and micron of the inner bag?
Are potential foreign objects such as staples avoided in packaging? <input type="checkbox"/>
Does the packaging indicate recycling symbols? <input type="checkbox"/>

### Coding

General Coding Requirements:		
Coding	Unit	Agent or distributor ( <i>If applicable</i> )
Barcode	EAN:	TUN:
Type of Code (best before date, use by date, date packed, Julian code, baked on code etc.)		
Method of Coding (sticker, embossed, inkjet, stamped etc.)		
Format of Code ( <i>Insert an example of the product code</i> )		
Translation of Code		
If in contact with Food, is coding ink Food grade?		

### COMMENTS / ADDITIONAL INFORMATION

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### SPECIFICATIONS

Test methods must quote AOAC methods or recognised independent or international standards. Where a supplier's internal test method is quoted, the method must be attached.

**Physical Specifications**

*(Examples may include particle size, shape, specific gravity, metal detection, foreign matter tolerances, physical defect tolerances etc. as appropriate for the product)*

Test / Parameter	Specification	Test Method

**Chemical Specifications**

*(Examples may include Salt, acid, pH, histamine, moisture, brix, Aw, pesticide compliance etc. as appropriate for the product)*

Test / Parameter	Specification	Test Method

**Microbiological Specifications**

*(Examples may include standard plate count, yeasts & moulds, coliforms, salmonella, listeria, etc as appropriate for the product)*

Test / Parameter	Specification	Test Method

## **GUIDELINE 7**

### **MISLEADING STATEMENTS**

The document of the United Kingdom on criteria for the use of the terms such as fresh; pure; natural; etc. in food labeling shall apply, as revised July 2008 (or the latest update thereof), and available at:

<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/freshpurenaturalguidancenote>

## GUIDELINE 8

### ADDITIVES AND OTHER INGREDIENTS DERIVED FROM NON-VEGETARIAN ORIGIN

INS = International Numbering System

- Bone phosphate (INS 542)
- Bees wax for use on confectionary and chocolate panning (INS 901);  
Canthaxanthin, a colourant (INS 161g) or may be synthesized
- Gelatine
- Honey
- L-Cysteine may be derived from human hair
- Cochineal (INS 120), or Carmine of Cochineal Carminicigo derived from the insect *Dactilopius coccus*
- Glycerine/glycerol, (may be derived from animal fats or from vegetable origin INS 422);
- Lactic acid esters of mono- and di-glycerides of fatty acids prepared from esters of glycerol (INS 472b)
- Mono- and di-glycerides of fatty acids may have a synthetic or animal source (INS 471)
- Quinoline Yellow (INS 104) may be derived from non-vegetarian source;
- Rennet, and pepsin
- Roe or caviar (fish eggs)
- Shellac (INS 904) (a substance obtained from the resin produced by the Lac insect which is mainly found in India; the secretions are dried before use on confectionary, chocolate panning , ice creams and edible ices)
- Sucrose esters of fatty acids prepared from glycerol and sucrose (INS 473)
- Sucroglycerides prepared by reaction of sucrose and natural triglycerides from palm oil lard et cetera (INS 474)
- Polyglycerol esters of fatty acids (INS 475)
- Vitamin D<sub>3</sub> may be derived from lanolin produced from sheep's wool.