



SOUTH AFRICAN ASSOCIATION OF THE FLAVOUR & FRAGRANCE INDUSTRY

GUIDELINES FOR BUSINESS TO BUSINESS LABELLING OF FLAVOURINGS IN SOUTH AFRICA v.2.1

September 2020

(See page 4 for list of changes to previous versions)

This document is intended to help all flavouring manufacturers and food business operators to better understand the requirements of the 'Regulations relating to the Labelling and Advertising of Foodstuffs Regulations R146 of 1st March 2010' as far as flavourings are concerned. It has been produced to provide informal, non-binding advice on the new Regulations and should be read in conjunction with the legislation itself. Every effort has been made to ensure that these Guidelines are as helpful as possible. However, it is ultimately the responsibility of the individual businesses to ensure their compliance with the law. This guide is a "living" document and will be updated on a regular basis. If you have further questions, please do not hesitate to contact SAAFFI on info@saaffi.co.za

DEFINITIONS

Business to Business, or B2B. This is the labelling of a flavouring and/or flavour supplied to a manufacturer of a food or beverage product.

Compound Ingredient means any ingredient which itself is composed of two or more ingredients.

Flavours are the experience given by the sum of the characteristics of any material taken into the mouth. It is perceived principally by the senses of taste and smell, but also includes the brain's interpretations of sensations from tactile and thermo receptors in the mouth.

Flavourings are products that are added to food to impart, modify, or enhance the flavour of food. Flavourings do not include substances that have an exclusively sweet, sour, or salty taste (e.g. sugar, vinegar, and table salt). Flavourings may consist of flavouring substances, natural flavouring complexes, thermal process flavourings or smoke flavourings and mixtures of them and may contain non-flavouring food

Ingredients. They are not intended to be consumed as such.

Label. For the purpose of these guidelines, the general term “label” refers to the Product Label (the printed label) that is affixed to the packaging of the flavouring, as well as trade documents that are used to transmit information, such as Certificates of Analysis (CoA), Technical Data Sheets (TDS) and Safety Data Sheets(SDS), as well as transportation documents.

Product Name is the name agreed upon between a flavouring manufacturer and its customer. It is possible to have several different names for the same product.

Product Number is the commercial reference number assigned to a flavouring by its creator/manufacturer, and is unique to that Flavouring/Bill of Material/Recipe.

Technical Data Sheet (TDS). As soon as a flavouring has been approved for use by a manufacturer of foodstuffs, its TDS is drawn up and sent to the customer.

PRODUCT LABEL

As a general rule, the Product Label should carry information that is needed by a customer's warehouse/production to ensure efficient and safe storage and handling of the flavouring.

The Product Label must conform to the legal requirements of South Africa, as well as any other country to which the flavouring is being exported.

Where flavourings not intended for sale to the final consumer are sold singly or mixed with each other and/or with other food ingredients and/or with other substances added to them for technological purposes, their packaging shall bear the following information:

- (a) the sales description, which will include the word 'flavouring';
- (b) the statement either “For use in foodstuffs” and/or “For industrial use, not for retail sale”;
- (c) if necessary, the special conditions for storage and/or use (hazard warnings);
- (d) a mark identifying the batch or lot;
- (e) Common Allergens present in the product;
- (f) the name, address, & phone number of the manufacturer, packager or seller;
- (g) the net quantity;
- (h) a date of minimum durability or use-by-date;
- (i) whether kosher and/or halaal (if applicable);
- (j) if necessary, disposal instructions;

TECHNICAL DATA SHEET (TDS)

The Product Data Sheet should include all relevant information about the flavouring to enable the customer to conform to his legal requirements and to handle consumer enquiries about the flavouring.

The TDS is to be identified with the Product Number, the Product Name, including, where applicable, any reference number specific to the customer.

For South Africa, the following is required:

Under 'Product Characteristics':

Appearance/Sensory (Colour, form, sensory test information)

Chemical/Physical properties (Water content, particle size, bulk density)

Microbiological properties

Shelf-life details

Storage conditions (How, at what temperature & flash point)

Under 'Ingredients':

Apart from flavouring substances that are grouped together under the general term 'Flavouring Substances', all other ingredients and additives are to be listed in descending order of weight;

Should the flavouring contain other ingredients and/or additives, which add aspects, other than flavour, to the foodstuff, it is to be regarded as a 'Compound Ingredient'. In such cases, the other additives/ingredients are to be declared in the ingredient listing on the label of the final product, and therefore need to be listed in the TDS.

(It is strongly recommended that suppliers of such flavourings draw the attention of their customer to this fact).

In cases where a flavouring contains preservatives and/or antioxidants to protect the flavouring, these additives are to be mentioned in the TDS. However, where the quantity is minimal and the carry-over to the foodstuff is negligible, and has no technical effect on the foodstuff, there is no need to mention them on the label of the foodstuff.

Under 'Allergen Information':

The common allergen group needs to be listed and an indication given whether it is present in the flavouring or not.

At present, only the 8 common allergens need to be listed. However, information about 'uncommon allergens' should be available at short notice, in case a request is received. Therefore it is advisable to add this information to the TDS.

Under 'Nutritional information':

Energetic value

Protein

Carbohydrates

Fat content

SAFETY DATA SHEET (SDS)

The MSDS covers many different health and safety aspects. At this stage there are few prescriptive requirements in South Africa.

The MSDS is to be identified with the Product Number, the Product Name, including, where applicable, any reference number specific to the customer, followed by the contact details of the local supplier and an emergency contact number.

The following aspects could be considered:

Identification of substance and its intended use

Hazards identification

Information on ingredients

First aid, Fire-fighting, Accidental release measures

Handling & Storage

Exposure controls & Personal protection

Physical & Chemical properties

Stability & Reactivity

Toxicological, Ecological information

Disposal considerations

Transport information

Regulatory information

Other information

Changes in V.2.0 compared to version dated March 2011:

Page 1: Deletion of "This could be supplied direct or indirect through and agent" as being superfluous.

Page 2: Deletion of the definition for "Flavouring Substances" as being out of place in this document.

Page 2: "(the sticky label)" changed to "(the printed label)".

Page 2: Deletion of "Material" and "M" with respect to the Safety Data Sheet in the definition of "Label".

Page 2: Deletion of the definition for "Non-flavouring food ingredients" as being out of place in this document.

Page 4: The change of Material Safety Data Sheet (MSDS) to "Safety Data Sheet (SDS)"

Changes in V.2.1 compared to V.2.0

Indicating the changes between V.2.0 and the version dated March 2011.

Page 4: Removing the "M" in "MSDS" x2.