
Food Labelling Requirements for Eggs and Egg Products

January 2009

Food sold in New Zealand must be labelled in accordance with the Australia New Zealand Food Standards Code (FSC) as well as other relevant New Zealand specific legislation. This page sets out the labelling requirements for eggs and egg products and provides information to help egg producers and egg product manufacturers meet New Zealand's food labelling requirements.

For information on New Zealand's food legislation, including a link to the Food Standards Code, visit our website at <http://www.nzfsa.govt.nz>.

Eggs and Egg Products must be Labelled

In general, you must label all packaged eggs and egg products. However, the FSC Standard 1.2.1 allows some exemptions to this rule. You do not have to label the following:

- Eggs sold unpackaged i.e. loose eggs.
- Eggs or egg products packaged in the presence of the purchaser. In other words, if you pack eggs from trays into bags while the consumer is watching, you do not have to label the bags.
- Eggs or egg products sold directly from the farm.
- Eggs or egg products sold at a fundraising event (i.e. funds go to the charity and not to the seller).

Definitions

Best-before date, in relation to a package of food, means the date which signifies the end of the period during which the intact package of food, if stored in accordance with any stated storage conditions, will remain fully marketable and will retain any specific qualities for which express or implied claims have been made.

Egg means the reproductive body in shells obtained from any avian species, the shell being free from visible cracks, faecal matter, soil or other foreign matter.

Egg Products means the content of egg, as part or whole, in liquid, frozen or dried form.

A **package** is any container or wrapper in or by which food intended for sale is wholly or partly encased, covered, enclosed, contained or packaged (Standard 1.1.1).

Packages for whole shell eggs include:

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- Fully enclosed egg cartons; or
 - Open egg trays, both wrapped and unwrapped; or
 - Other packaging e.g. paper bags.

Transportation outer means a package that –

- a. encases any packaged or unpackaged eggs or egg products for the purpose of transportation and distribution; and
- b. is either removed before the eggs or egg products are used or offered for retail sale, or is not taken away by the consumer.

Use-by date, in relation to a package of food, means the date which signifies the end of the estimated period if stored in accordance with any stated storage conditions, after which the intact package of food should not be consumed because of health and safety reasons.

Visible cracks include cracks visible by candling.

Labelling Requirements – Eggs and Egg Products

Labelling requirements for eggs and egg products may differ, depending on whether the eggs and egg products are sold for:

- Retail
- Catering
- Other uses for human consumption (e.g. for further processing)
- Animal consumption

Retail Sale

You must label all trays containing eggs intended for retail sale including those supplied to distributors. This requirement applies whether or not the eggs are wrapped.

If distributors or any other persons remove eggs from their original labelled tray and repack them into new packs or trays, they must fully label these new packs unless the repacking is done in front of the consumer.

General Requirements

See Table 1 below for details of labelling requirements for each sale category listed above.

Table 1: Summary of Labelling Requirements for Eggs and Egg Products

Labelling statements	Eggs			Egg Products		
	Retail	Catering	Other Uses (e.g. for further processing)	Retail	Catering	Other Uses
Name of food: e.g. eggs, dried eggs, frozen egg yolks	Required	Required	Required	Required	Required	Required
Lot identification: A date mark and the premises where the food was packed or prepared is sufficient	Required	Required	Required	Required	Required	Required
Supplier's name & business (street) address in New Zealand or Australia: 'Supplier' includes packer, manufacturer, vendor or importer of the food.	Required	Not required on label if this information is supplied in documents accompanying the eggs	Not required on label if this information is supplied in documents accompanying the eggs	Required	Not required on label if this information is supplied in documents accompanying the egg products	Not required on label if this information is supplied in documents accompanying the egg products

	Eggs			Egg Products		
Labelling statements	Retail	Catering	Other Uses (e.g. for further processing)	Retail	Catering	Other Uses
<p>Date marking and associated statement of storage conditions</p> <p>See Statement of Storage Conditions below for more information</p>	<p>Required 'best before' date and storage conditions</p> <p>NZFSA recommends: - 35 days from date of lay if eggs are held at or below 15°C throughout the supply chain; or - 21 days from date of lay if eggs are held at temperatures higher than 15 °C anywhere in supply chain.</p> <p>* Other shelf lives may be acceptable – see <i>Alternative Shelf-life Claims</i> below</p>	<p>Required 'best before' date and storage conditions</p> <p>NZFSA recommends: - 35 days from date of lay if eggs are held at or below 15°C throughout the supply chain; or - 21 days from date of lay if eggs are held at temperatures higher than 15 °C anywhere in supply chain</p> <p>* Other shelf lives may be acceptable – see <i>Alternative Shelf-life Claims</i> below</p>	<p>Not required on label but if requested suppliers must provide information to enable purchasers to comply with labelling & compositional requirements of the FSC</p>	<p>Required Date marks as below and storage conditions:</p> <ul style="list-style-type: none"> - liquid products require a 'best before' or a 'use by' date; - frozen & dried products require a date mark if shelf-life is less than 2 years. - date mark not required if shelf life longer than 2 years. 	<p>Required Date marks as below and storage conditions:</p> <ul style="list-style-type: none"> - liquid products require a 'best before' or a 'use by' date; - frozen & dried products require a date mark if shelf-life is less than 2 years. - date mark not required if shelf life longer than 2 years. 	<p>Not required on label but if requested suppliers must provide information to enable purchasers to comply with labelling & compositional requirements of the FSC</p>

	Eggs			Egg Products		
Labelling statements	Retail	Catering	Other Uses (e.g. for further processing)	Retail	Catering	Other Uses
Number of contents, net weight or volume This is covered in Weights & Measures Regulations 1999	Required	Not required	Not required	Required	Not required	Not required
Nutrition Information Panel See Standard Nutrition Information Panel Table 2 below for example of standard NIP	Required	Not required on label if this information is supplied in documentation	Not required on label but, if requested, suppliers must provide information to enable purchasers to comply with labelling & compositional requirements of the FSC	Required	Not required on label if this information is supplied in documentation	Not required on label but, if requested, suppliers must provide information to enable purchasers to comply with labelling & compositional requirements of the FSC

Labelling statements	Eggs			Egg Products		
	Retail	Catering	Other Uses (e.g. for further processing)	Retail	Catering	Other Uses
Ingredient list	N/A	N/A	N/A	<p>Required if more than 1 ingredient. For all ingredients list:</p> <ul style="list-style-type: none"> - common name; or - description; or - generic name when specified in the FSC. <p>Use class name of food additives if specified in the FSC, followed by the specific name or code number of the additive.</p>	Not required on label if this information is supplied in documentation	Not required on label but, if requested, suppliers must provide information to enable purchasers to comply with labelling & compositional requirements of the FSC

Labelling statements	Eggs			Egg Products		
	Retail	Catering	Other Uses (e.g. for further processing)	Retail	Catering	Other Uses
“Unpasteurised” statement	N/A	N/A	N/A	Required on the label ¹ Labels on unpasteurised egg products (or foods containing them) must advise / state that the product / food contains unpasteurised egg.	Required on the label ¹ Labels on unpasteurised egg products (or foods containing them) must advise / state that the product / food contains unpasteurised egg.	Required on the label ¹ Labels on unpasteurised egg products (or foods containing them) must advise / state that the product / food contains unpasteurised egg.
‘Not for human consumption’ statement	Eggs or egg products sold for animal consumption or pet food must state ‘not for human consumption’ on the label or on accompanying documentation, if they could be mistaken for food for human consumption.					

¹ Standard 1.2.3 requires unpasteurised egg products to be labelled with an advisory statement that the product is unpasteurised.

Statement of Storage Conditions

The label on a package of food must include a statement of any specific storage conditions required to ensure that the food will keep for the specified period indicated in the use-by or best-before date.

Shelf Life Claims – NZFSA Recommendations

For whole shell eggs, NZFSA recommends a shelf life of 21 or 35 days from date of lay depending on storage conditions throughout the distribution chain. You must therefore provide a clear statement of the storage conditions required to claim the shelf life that appears on their label. The following combinations of shelf life and storage statements are acceptable.

Note: You may claim an alternative shelf-life if you follow the procedures in *Alternative shelf life claims* below the table.

Storage conditions – whole shell eggs	Shelf life claim available from date of lay	Storage statement
1. Egg producers do not store eggs under temperature control	21 days	Not required
2. Egg producers store eggs at 15 degrees C or less but are unsure whether any distributors or retailers will store them at 15 degrees C or less	One statement on label: 21 days	Not required
	or Two statements on label: 21 days 35 days	Not required Store at 15 degrees C or less
3. Egg producers store eggs at 15 degrees C or less and are certain that any distributors or retailers receiving these eggs have the same temperature control facilities	35 days	Store at 15 degrees C or less

Alternative shelf life claims

NZFSA will allow shelf life claims that differ from the options above only if you:

- validate the alternative shelf life period
- document the alternative shelf life in your RMP (either initially or as a significant amendment)
- have the alternative shelf life evaluated by a recognised evaluator
- apply to NZFSA for registration of the RMP or amendment.

Standard Nutrition Information Panel (NIP)

The minimum information required in the NIP (when no nutrition claims are made) is set out in Table 2 below. If you use average quantities or minimum/maximum quantities for the Serving or Quantity per 100g (or 100 ml) information, you must state this on the NIP e.g. “average Quantity per Serving” or “average Quantity per 100 g / 100 ml”.

Table 2: Example of how a Standard NIP should be set out:

NUTRITION INFORMATION		
Servings per package: (insert number of servings)		
Serving size: g (or mL or other units as appropriate)		
	Average Quantity per Serving	Average Quantity per 100g
Energy	kJ (Cal)	kJ (Cal)
Protein	g	g
Fat, total	g	g
– saturated	g	g
Carbohydrate	g	g
– sugars	g	g
Sodium	mg (mmol)	mg (mmol)
(Insert any other nutrient or biologically active substance to be declared)	g, mg, µg (or other units as appropriate)	g, mg, µg (or other units as appropriate)

Claims

You must have evidence to back up any claims made on egg or egg product labels or on accompanying documentation.

Nutrition Claims

A nutrition claim is a claim that states, suggests or implies that food has a general or specific nutritional property, e.g. omega enriched eggs. Before making a nutrition claim:

- a. check that the FSC allows such a claim;
- b. find out what extra information the FSC requires to back-up the claim; and
- c. add this extra information to the minimum requirements in the NIP.

Health Claims

The FSC does not allow you to make health claims for eggs or egg products, except for folate, and then only under specific conditions as set out in the FSC (Standard 1.1.A.2).

False or Misleading Claims

Fair Trading legislation prohibits the use of any false, misleading or deceptive claims.

The Food Act 1981 prohibits the sale of food with false or misleading statements, words, brands, pictures, labels or marks.

Labels must not contain any words or other representations that imply approval of the labelled food or of patronage by a government department, including NZFSA. However you do have the option of including your RMP identifier on labels.

Recycled Packaging for Eggs

You can pack eggs into recycled packaging provided that you comply with the following rules:

- make sure that the packages are visibly clean and undamaged so that they will not contaminate the eggs (Animal Products (Specifications For Products Intended for Human Consumption) Notice 2004); and
- completely remove or deface, any false or misleading information (including any names or contact details of other producers) that is left on the packaging from previous uses.

Labelling of Transportation Outers

The Animal Products (Specifications for Products Intended for Human Consumption) Notice requires that transportation outers are labelled with the animal product name or description, and with storage directions necessary to keep the product fit for intended purpose.

If the animal product is not intended for human consumption you must state this clearly on the transportation outer.

Further Information on the FSC

NZFSA's Publications and Fact Sheets on the Food Standards Code. Those available at the time of printing include:

- NZFSA Food Labelling Guide
- What's on a Food label? Date Marking and Storage Instructions

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- What's on a Food label? Allergen Labelling and Warning/Advisory Statement
 - What's on a Food label? Alcoholic Beverages and Food

Otherwise contact the Public Health Unit at your local District Health Board

OR

New Zealand Food Safety Authority (NZFSA)

Hotline: 0800 NZFSA1 (0800 693 721)

www.nzfsa.govt.nz

Email: info@NZFSA.govt.nz

PO Box 2835

WELLINGTON

PURPOSE of the INFORMATION, and DISCLAIMER

The information contained in this document is provided for the purpose of giving a general understanding of the New Zealand food labelling compositional requirements to both consumers and industry personnel. It is not a professional commentary on the law nor is it provided as a basis of any decision making to be undertaken by the reader. It is general guidance only.

Every effort has been made to ensure that the information contained is accurate; however general information by its very nature cannot cover every specific to the degree of accuracy expected in the provision in professional advice. In addition, the Australia New Zealand Food Standards Code (FSC) will be forever changing and it is not intended to amend this general guidance every time the Australia New Zealand Food Standards Code (FSC) is amended. Amendments to the guidance contained in this document will be restricted to major developments only. Reliance should be placed on the wording of the legislation itself. This is available at the NZFSA website at www.nzfsa.govt.nz or from any government bookshop.

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