1. **LABELLING & CLAIMS**

# Section 7.1 Labelling Overview

1. For each new product a labelling review shall be completed to ensure the labelling is correct and in accordance with the relevant regulatory requirements.
2. All product labelling shall be reviewed to verify the ingredient labelling aligns with the product formulation. This shall be carried out by the manager and form part of the internal verification.
3. Products where the label carries a claim shall have validated documentation to support the claim. This shall include PIF on raw materials and final product test reports. The product shall be re-validated should there be a change of ingredient.
4. A review of labelling shall be conducted:

* when any relevant regulations change
* when a new product is being developed
* if there is a change in product recipe or allergen status
* when there is a change in raw material
* when a regulatory non-compliance has been raised e.g. during external verification audit
* if new ingredients are introduced
* if there is evidence for new or emerging hazards

It is the responsibilities of the operator to ensure all obsolete packaging is not used.

**DISCLAIMER**

*Information in this document is prepared by the Brewers’ Guild of New Zealand for use by its members only. Material may not be published or reproduced without permission of the Guild. This document represents the Guild’s interpretation of the regulatory labelling requirements as of February 2024, principally those outlined in the ANZ Food Standards Code. All due care and attention has been exercised in the preparation of this document. However, labelling regulations will change over time, and interpretations may differ. This document is not intended as legal advice and members rely upon it at their own risk. The Guild and their officers, employees, contractors or agents disclaim any liability of any kind for any inaccuracy error, omission or other flaw in the information contained in this document, and for any loss and/or damage that may arise from reliance on the information presented.*

# Section 7.2 Food Standards Code

All alcoholic drink labels need: accurate name or description, amount of alcohol, pregnancy warning label, net contents, allergen and advisory statements (if applicable), Best Before date (if applicable), storage instructions (if applicable), number of standard drinks, business name and physical address, lot/batch ID, and nutrition information panel (only if you make a nutrition content claim).

Most labelling requirements for food and beverages are noted in the Australia New Zealand Food Standards Code. Key standards for most relevance are noted as follows:

Related standards:

* Standard 1.1.2 - Definitions used throughout the Code
* Standard 1.2.2 - Information Requirements – food identification
* Standard 1.2.3 - Standard 1.2.3 – Information requirements – warning statements, advisory statements and declarations
* Standard 1.2.4 – Information requirements – statement of ingredients
* Standard 1.2.5 – Information requirements – date marking of food for sale
* Standard 1.2.7 - Nutrition, health and related claims
* Standard 1.2.8 - Nutrition information requirements
* Standard 1.3.1 - Food additives
* Standard 1.3.3 - Processing aids
* Standard 2.6.2 – Non-alcoholic beverages and brewed soft drinks
* Standard 2.7.1 - Labelling of alcoholic beverages and food containing alcohol
* Standard 2.7.2 - Beer
* Standard 2.7.5 – Spirits

These standards are for use in relation to products sold in New Zealand and Australia only. All other export markets have their own set of rules, and it is important to ensure that you research and/or obtain advice on the rules for each particular market.

It is useful to consult with your local distributor or importer in foreign markets as this will help to ensure that they are satisfied that the label meets the requirements of their market and that they carry some responsibility for the content of the label.

# Section 7.3 Labelling Requirements

The required labelling should be impossible to remove or at least shouldn’t rub off or fade to the point that it’s not easily readable. This also extends to Date Markings and Lot Identification, which are not normally pre-printed on the packaging. Words should be easy to read.

Words must be easily distinguishable from graphics and decorations or logos. The labelling should also be noticeable or ‘stand-out’ from the background colour. Ideally, required information should be placed on the package such that it falls within the same field of vision (e.g., together on the front panel of a product pack) when it is presented for sale.

The label must:

* be easy to read,
* be written in English\*
* be true.

\*Languages other than English are allowed on labels, but they must not negate or contradict the required information in English.

7.3.1 Brand Name (Recommended)

It is typically a requirement of retailers that the brand name appears on the front of the label.

7.3.2 Product Description (Mandatory – Standard 1.2.2)

In order to satisfy the Fair Trading Act and the Food Act requirements, the Food Name or Description must not be misleading about the true nature of the food. For beer there must be a reference to beer, lager, stout, porter, pilsner, ale etc (the list of beer styles listed in Standard 1.2.2 is not designed to be an exhaustive list) on the label i.e., “Blue Monster” is not adequate; there needs to be a description which indicates the true nature of the product. This does not need to be on the front of the label. Where abbreviations are used, e.g., IPA to ensure that it meets these requirements the product should be named in full, in addition to the abbreviation i.e., Indian Pale Ale (IPA may not be sufficient to a non-beer drinking consumer). This can be on the back of the label.

Include info on other fermented alcoholic beverages e.g. alcoholic ginger beer, alcoholic kombucha, mead, plus the mixed products e.g. braggot etc

7.3.3 Volume Statement (Mandatory)

The net contents in millilitres (mL or ml), centilitres (cL or cl) or litres (L or l) must be in text that is 2 mm or bigger and be near the name of the alcoholic drink.

There should be a space between the numerical value and the unit of measurement e.g., “330 ml”

7.3.4 Ingredients (Standard 1.2.4)

You don't need an ingredient list on beer, spirits (e.g., brandy), cider, fruit wine and vegetable wine, fruit wine products and vegetable wine products, liqueur, mead, perry/pear cider, wine and wine products.

If you choose to include an ingredient list then it should follow the Food Standards Code requirements, including being in descending order, and include allergens if present.

**Permitted ingredients**

Food Additives

Food additives can be added to drinks. Check Schedules 15 and 16 of the Code for what is allowed and at what level.

Items 14.2 and 14.3 in Schedule 15 list the food additives that can be used in alcoholic drinks. The details for Additives permitted at good manufacturing practice (GMP; means using the smallest amount necessary to achieve the desired effect), Colourings permitted at GMP and Colourings permitted to a maximum level (to a combined quantity of 290 mg/kg) are in Schedule 16 of the Code.

If your food additive isn't in one of the Schedules, you can't use it to make your drink.

Flavourings

Flavourings are a type of food additive. A flavouring is an intense preparation – e.g., something that’s made in a lab or factory, not something that’s made in a standard kitchen. Check that a flavouring is allowed in Schedule 15 of the Code. ‘Flavourings’ will appear as ‘Permitted flavouring substances’ or ‘Additives permitted at GMP’ e.g. under item 14.2.1, beer is allowed to contain 'Permitted flavouring substances'.

Processing Aids

Processing aids may be used to make your drink. Check Standard 1.3.3, Schedule 16 (S16–2 for food additives permitted at GMP) and Schedule 18 of the Code.

Herbs

Herbs consist of leaves, flowers, stems and roots from a variety of herbaceous plants, used in relatively small amounts as condiments to flavour foods or beverages. They are used either in fresh or naturally dried form. Herbs are fully exposed to pesticides applied during the growing season. There may be registered post-harvest treatments for dried herbs.

Herbs: Angelica; Balm leaves (Melissa officinalis); Basil; Bay leaves; Burnet, great (Banguisorba officinalis); Burnet, salad; Burning bush (Dictamnus albus); Catmint; Celery leaves; Chives; Curry leaves; Dill (Anethum graveolens); Fennel; Hops; Horehound; Hyssop; Kaffir lime leaves; Lavender; Lemon balm; Lemon grass; Lemon verbena; Lovage; Marigold flowers (Calendula officinalis); Marjoram; Mints; Nasturtium leaves (Tropaeolum majus L.); Parsley; Rosemary; Rue (Ruta graveolens); Sage; Sassafras leaves; Savoury, summer, winter; Sorrel; Sweet cicely; Tansy; Tarragon; Thyme; Winter cress; Wintergreen leaves (Gaultheria procumbens L.); Woodruff (Asperula odorata); Wormwoods (Artemisia spp.).

Spices

Spices consist of the aromatic seeds, roots, berries or other fruits from a variety of plants, which are used in relatively small quantities to flavour foods. Spices are exposed in varying degrees to pesticides applied during the growing season. There may be registered post-harvest treatments for dried spices.

Spices: Angelica seed; Anise seed; Calamus root; Caper buds; Caraway seed; Cardamom seed; Cassia buds; Celery seed; Cinnamon bark; Cloves; Coriander, seed; Cumin seed; Dill seed; Elecampane root; Fennel seed; Fenugreek seed; Galangal, rhizomes; Ginger, root; Grains of paradise; Juniper berry; Liquorice root; Lovage seed; Mace; Nasturtium pods; Nutmeg; Pepper, black, white; Pepper, long; Pimento, fruit; Tonka bean; Turmeric, root; Vanilla, beans.

Plants & Fungi

Prohibited plants and fungi listed in schedules to Standard 1.4.4 cannot be added. The list of prohibited plants and fungi is too long to include in this document, but includes things such as tobacco, male fern, hemp and karaka kernel. If you are contemplating an “indigenous beer” please check Standard 1.4.4 first.

Do we need to include novel foods here….

7.3.5 Alcohol Content (Mandatory - Standard 2.7.1)

For an alcoholic beverage that contains more than 1.15% alcohol by volume the alcohol content must be expressed in mL/100g, mL/100mL or as the percentage of alcohol by volume. The alcohol content must be expressed in words to the effect ‘CONTAINS NOT MORE THAN X% ALCOHOL BY VOLUME’.

We recommend alc./vol. as this layout in lower case is accepted worldwide (except USA which is fl.oz.) and is the only format accepted in Canada.

Labelling of beer must be accurate to within +/- 0.3% alcohol by volume. Spirits, liqueurs and all other alcoholic beverages containing more than 1.15% alcohol by volume must be accurate to within +/- 0.5% alcohol by volume.

NOTE: Decimal values must be represented with a decimal point and NOT a European decimal comma.

7.3.6 Standard Drinks Statement (Mandatory - Standard 2.7.1)

It is mandatory to declare the number of standard drinks for a beverage that contains more than 0.5% alcohol by volume, measured at 20°C.

The statement must be accurate to:

1. for a food for sale containing 10 or less standard drinks—the first decimal place
2. for a food for sale containing more than 10 standard drinks—the nearest whole number of standard drinks.

To calculate the Number of Standard Drinks – use the following formula:

Volume of container (in Litres\*) x % alcohol by volume (in ml/100ml) x 0.789\*\* = The number of standard drinks.

\* e.g., a 750mL bottle is 0.75 Litres.

\*\* The specific gravity of ethanol [alcohol] is 0.789

7.3.7 Country of Origin (Mandatory in Australia Only)

This is mandatory in Australia only. New Zealand products that are legally labelled in the New Zealand market may be sold in Australia.

A PDF of the Australian requirements can be read at:

Australian Competition & Consumer Commission – [www.accc.gov.au](http://www.accc.gov.au)

Australia New Zealand Food Standards Code – [www.foodstandards.gov.au/food-standards-code](http://www.foodstandards.gov.au/food-standards-code)

NOTE: The country of origin statement claimed on the label shall match what is claimed on the multi-pack and the carton.

7.3.8 Name and Address of Supplier (Mandatory)

The label must contain the name and business address of the “supplier”. The “supplier” may be the brewery or contract brewery, packer, vendor or importer. It is permitted to include more than one set of details e.g. brewery and importer details, but there must be a physical address. It is recommended to also put a website or contact phone number or email address. The supplier named on the label is presumed to be responsible for the product and will be the first party contacted if there is an issue under the Food Act 2014.

7.3.9 10c Refund Statement (Mandatory in Australia)

It is a requirement in the state of South Australia and/or the Northern Territory that the individual beverage container display the 10c refund statement:

REFUND AT SA/NT COLLECTION DEPOTS10c IN STATE/TERRITORY OF PURCHASE

The numeric “10” must have a minimum text height of 3mm and the smallest letter in the wording must be a minimum text height of 1.5mm.

A minimum 3mm “free space” boundary around the refund marking is recommended. This should go on the bottle/can only and not the outer packaging.

7.3.10 Best Before Date (Mandatory)

The label must include its best-before date (unless the best-before date of the beer is two years or more). The best-before date must use the words ‘Best Before’ accompanied by the date, or a reference to where the date is located in the label.

For example, “FOR BEST BEFORE, SEE BOTTLE NECK”. The form of date is prescribed, examples of acceptable date formats are:

If the best-before date is not more than 3 months from the date it is applied:

1. The day and month, in that order e.g., ‘14 12’ or ‘14 12 2024’.
2. If the month is expressed in letters—the day and the month, in any order e.g., ‘14 Dec’ or’14 Dec 2024’.

If the best-before date or a use-by date is more than 3 months from the date it is applied—the month and the year, in that order e.g., ‘Dec 2024’ or ’12 2024’ or ’14 12 2024’ or ’14 Dec 2024’.

7.3.11. Pregnancy Warning (Mandatory - Standard 2.7.1)

A prescribed alcoholic beverage that has more than one layer of packaging must display a pregnancy warning label on the outer package and either the individual unit; or each individual unit—if the packaging includes more than one individual unit. A pregnancy warning label is not required to be on the outer package if a pregnancy warning label on an individual unit is clearly discernible and not obscured by the outer package.

The pregnancy warning label format (warning pictogram or warning mark), colours and sizing is determined by the packaging type and volume of alcohol container.

To download the labels and for further information (including required sizes), visit: [www.foodstandards.gov.au/business/labelling/pregnancy-warning-labels/pregnancy-warning-labels-downloadable-files](http://www.foodstandards.gov.au/business/labelling/pregnancy-warning-labels/pregnancy-warning-labels-downloadable-files)

Pregnancy warning pictogram; silhouette of a pregnant woman holding a wine glass within a circle with a strike-through.

A black and white symbol with text

Description automatically generated

Used for –

* an alcoholic beverage/individual unit with a volume not over 200 ml.
* Outer package of a prescribed alcoholic beverage with a volume not over 200 ml and packaging that includes only one individual unit.

Pregnancy warning mark comprises the pregnancy warning pictogram, the signal words 'Pregnancy Warning', and the statement 'Alcohol can cause lifelong harm to your baby' all within a border.

A white sign with black text

Description automatically generated

Used in varying sizes for alcoholic beverage/individual unit with a volume over 200ml (3 different sizes based on the volume of the alcoholic beverage package).

An optional alternative label for outer package of an alcoholic beverage that includes more than one individual unit in the package that is made of corrugated cardboard and has an outside liner made of kraft, recycled or white paper; and printed on using a post-print (flexographic) printing process.

A sign with black text

Description automatically generated

Refer [www.foodstandards.govt.nz/business/labelling/pregnancy-warning-labels](http://www.foodstandards.govt.nz/business/labelling/pregnancy-warning-labels) for specific details.

7.3.12 Lot Code (Mandatory)

Lot/batch identification shall appear on packaging to identify the production source and time and is a critical factor in the event of product recall.

Lot identification shall detail, in a clearly identifiable form, the premises where the food was packed or prepared, and the Lot of the food in question. Where a manufacturer has multiple production lines, or uses a limited production line for multiple food/beverage operations, the best-before dates are not considered to indicate lot identification. Otherwise it is acceptable to state: Lot Code: See Best Before Date.

The lot code should be indelible, and in a suitable contrasting colour to the background.

7.3.13 Barcode (Recommended)

It is recommended to use an EAN-13 barcodes with the minimum GS1 standards listed below:

• 80% magnification

• Adequate light margins either side of the bars

• Truncation not acceptable

For more information on barcodes contact [www.gs1.co.nz](http://www.gs1.co.nz)

The Guild recommends you request that your printing company get the label GS1 tested prior to printing.

7.3.14 Drinkwise Logo (Australia) Or Cheers! Logo (NZ) (Recommended)

Although it is not mandatory to have an icon displayed on a label, it is preferred to have it included if space permits. For full instructions on how to use these logos visit the links below:

DRINKWISE [www.drinkwise.org.au](http://www.drinkwise.org.au)

CHEERS! [www.cheers.org.nz](http://www.cheers.org.nz)

The Guild is a signatory to the Cheers! Initiative and encourages breweries to use the Cheers! logo as a way of driving consumers towards the [www.cheers.org.nz](http://www.cheers.org.nz) website where useful information on safe and responsible drinking can be found. To apply to use the Cheers! logo please visit [www.cheers.org.nz](http://www.cheers.org.nz)

7.3.15 Recycle Logo (Recommended)

If the container is made of recyclable materials, for example glass or aluminium, it is recommended that the labelling display a recycle symbol. The Packaging Pac.NZ has a useful guide: [www.packaging.org.nz/attachments/docs/labelling-page.pdf](http://www.packaging.org.nz/attachments/docs/labelling-page.pdf)

7.3.16 Allergens (Mandatory – Standard 1.2.3)

Allergens must be declared if they are present in the product whether as an ingredient, part of a compound ingredient, an additive, a processing aid or component of these. Refer also FSP section 3.4 (Allergen Management).

Exemptions\*\*

Beer and spirits are exempt from declaring gluten and/or wheat (if the cereal or its hybridised strain is present in beer or spirits). Other specific exemptions from allergy declarations are - alcohol distilled from wheat, glucose syrups made from wheat which have removed as much gluten as possible and there’s no more than 20 mg/kg of gluten, fish when isinglass is used as a clarifying agent in beer or wine, milk when alcohol is distilled from whey.

Note that for beer and spirits where no ingredients list is required, if any allergens are present, the required allergen name must be used on the label (e.g., lactose must be declared as ‘milk’, and Preservative (220) must be declared as ‘sulphites’), but no "contains statement" or specific formatting (e.g., bold text) need to be used.

Common food allergens and/or substances capable of causing an intolerance, must be declared\*\* on food labels. These are:

* Cereals containing gluten\*\* and their products (e.g., *wheat, rye, barley, oats*)
* Wheat\*\*
* Egg
* Fish
* Milk (includes milk from cows, deer, goats, sheep, buffalo) (e.g., *lactose*)
* Crustaceans (e.g., *crab, crayfish, lobster, scampi, shrimp, prawns*)
* Molluscs (e.g., *clams, cockles, cuttlefish, kina, mussels, octopus, oysters, periwinkles, pipi, paua, sea snails, scallops, squid, tuatua*)
* Soy
* Sesame
* Peanuts
* Lupin
* Added sulphites in concentrations of 10mg/kg or more\*
* Tree nuts (declare the specific nut, as below)
  + Almonds
  + Brazil nuts
  + Cashews
  + Hazelnuts
  + Macadamias
  + Pecans
  + Pine nuts
  + Pistachios
  + Walnuts

\*It must be stated on the label if sulphites are present in concentrations of 10mg/kg or more. The required allergen name must be used on the label (i.e., ‘sulphites’). While no "contains statement" or specific formatting (e.g., bold text) need to be used it is recommended to declare this using the statement on the label – ‘Contains sulphites’.

Other than beer and spirits (for gluten and wheat) if you have these ingredients in your products, you must declare them as allergens on your label unless they are not present in the finished product. You may choose to have the finished product tested and if there is no detectable trace of the allergens then they will not need to be declared.

7.3.17 Gluten Free or Low Gluten Claims (Mandatory - Std 1.2.7 & Schedule 4)

To claim *Gluten Free*, the food must not contain:

1. detectable gluten; or
2. oats or oat products; or
3. cereals containing gluten that have been malted, or products of such cereals.

To claim *Low Gluten*, the food must contain no more than 20 mg gluten/100g of the food.

Note 1 part per million, or ppm = 1 mg/kg or 0.1 mg/100g.

Currently, it's not possible to test down to zero ppm of gluten. Typically, laboratories can detect gluten down to 2.5 or 3 ppm, and report this as either gluten < 2.5 mg/kg, or < 3 mg/kg. As this is the most sensitive limit of detection (LOD) or limit of quantification (LOQ), these results are considered to meet the requirement of no detectable gluten (however these limits may lower as gluten testing technology improves).

A product which contains oats or oat products and / or cereals containing gluten that have been malted, or products of such cereals cannot claim to be gluten free. However, the product can claim to be low gluten if it contains less than 20 mg of gluten/100g (<200 mg/kg).

A Nutrition Information Panel (NIP) is required for a ‘gluten free’ and/or ‘low gluten’ claim.

7.3.18 Must Comply with Advertising Standards Authority (ASA) Code (Mandatory)

Labels shall not link alcohol with daring, aggressive, unruly, irresponsible or anti-social behaviour, nor suggest any association with, acceptance of, or allusion to, tobacco, illicit drugs or volatile substances such as glue and petrol; explosives and weaponry. Alcohol advertising and promotions shall not be directed at minors nor have strong or evident appeal to minors in particular such as the use of heroes or heroines. They shall not use designs, motifs, or cartoon characters that have strong or evident appeal to minors i.e. using buzzy bee or the Red Baron on a label or advertising could be deemed to be appealing to minors.

A sparkling wine claimed “Bottled Happiness”. They had to change their packaging as ASA upheld that implied that liquor will create a desirable change in mood. A label featuring sword fighting would not comply as it is weaponry. For more information see <http://www.asa.co.nz/codes/codes/code-for-advertising-and-promotion-of-alcohol/>

If you are unsure about whether a label (or advertising/website etc. breaches the Code we recommend you get approval by the Liquor Advertising Pre-vetting System (LAPS). There is a nominal charge for this service. See www.anza.co.nz/pre-vetting.

7.3.19 Irresponsible Promotion of Alcohol (Mandatory - S237 Sale and Supply of Alcohol Act)

A person commits an offence if, in the course of carrying on a business, that person does anything that encourages people, or is likely to encourage people, to consume alcohol to an excessive extent, whether on licensed premises or at any other place. This section can potentially apply to labelling so you need to take into account if anything on the label could be deemed to be encouraging people to drink to an excessive extent.

7.3.20 Nutrition Information Panel (NIP)

A Nutrition Information Panel (NIP) is not mandatory for alcoholic beverages. Consumers are becoming more interested in ingredients and NIP of products so while neither of these are mandatory, it is worth thinking about whether to include this sort of information on your website.

If you produce non-alcoholic beverages, it is mandatory to include a NIP. In limited circumstances e.g., for an inner package that is not for individual sale, if there is limited space on the bottle label, the NIP can be printed on the outer packaging only.

Where claims are made a Nutrition Information Panel is required to be used (e.g., gluten free or energy / carbohydrate claim, see below)

7.3.21 Nutrition, Health and Related Claims (Mandatory- Std 1.2.7 & S4)

A nutrition content or health claim cannot be made for a beverage that contains more than 1.15% alcohol by volume, except for nutrition content claims about energy content, carbohydrate content or gluten content. The requirements for reduced energy (calories) claims (e.g., ‘Low’, ‘Reduced or Light/Lite’ or Diet), carbohydrate (reduced or light/lite and gluten (free, or low) can be found in Schedule 4 of the Food Standards Code.

It should be noted that FSANZ is currently (February 2024) considering two proposals, that will change these requirements.

P1049 - Carbohydrate and sugar claims on alcoholic beverages.

The purpose of this proposal is to clarify requirements in the Australia New Zealand Food Standards Code with respect to claims about carbohydrate content and the components of carbohydrate (such as sugar) in relation to food that contains more than 1.15% alcohol by volume (ABV), including alcoholic beverages.

P1059 - Energy labelling on alcoholic beverages

FSANZ has assessed Proposal P1059 to consider amending the Food Standards Code to require the declaration of energy (kilojoule) content information, in a prescribed format, on the label of packaged alcoholic beverages.  ​

Health claims cannot be made on websites or other publicity material (i.e., “drinking a glass of red wine a day is good for you” can be written by a journalist in an article but you cannot make this type of claim on your own website).

7.3.22 Low/Reduced Alcohol Content Statements (Mandatory- Std 1.2.7 & 2.7.1)

To be described as Low alcohol, beer must contain 1.15 percent alcohol by volume or less. The Australia New Zealand Food Standards Code prohibits any product containing more than 1.15% alcohol from being represented as a low alcohol beverage.

The label on a package of a beverage containing more than 0.5% alcohol by volume must not include the words ‘non intoxicating’ or words of similar meaning.

The Advertising Standards Authority Code for Advertising and Promotion of Alcohol defines “light” or “lite” as containing a maximum of 2.5% alcohol by volume. However, in the absence of any explicit restriction, it is assumed that relative or comparative claims (e.g. “lower” or “reduced” alcohol) are currently permitted in relation to a product’s alcohol content. Although outside the nutrition claim framework producers may choose to follow a similar approach by ensuring that they include the identity of the reference product and the difference between the alcohol content in the claimed beer and the reference beer.

7.3.23 Fair Trading Act 1986

All information on beer and other alcoholic beverage packaging (as well as any other material used to present or describe an alcoholic beverage) is subject to the Fair Trading Act 1986, which prohibits misleading or deceptive conduct in trade, conduct that is liable to mislead in respect of goods, and false or misleading representations as to quality, grade, composition, style or nature of products. i.e. you cannot say “brewed according to the Bavarian Purity Laws” if you are adding sugar.

Section 12A of the Fair Trading Act was amended in 2013 and now requires substantiation of representations made in trade. A representation is unsubstantiated if the person making the representation does not, when the representation is made, have reasonable grounds for the representation, irrespective of whether the representation is false or misleading.

7.3.24 Environmental, Sustainability and Organic Claims

The Commerce Commission requires that “Businesses making environmental claims - including statements about sustainability, recycling, carbon neutrality, energy efficiency, use of natural products or impact on animals and the natural environment - should ensure those claims are accurate, scientifically sound and substantiated.” The Guild recommendation is that all such claims should be substantiated by current full certification to an appropriate third-party scheme as substantiation is now an explicit legal requirement under Section 12 of The Fair Trading Act.

Refer to: <https://comcom.govt.nz/business/dealing-with-typical-situations/making-accurate-claims>

7.3.25 Multi-Packs

If a multi-pack is to be sold as a single retail unit, then it should meet all of the requirements above. If there is a possibility that the multi-pack will be split and individual packages sold separately, then these should be fully labelled as well. The labels on the outer and inner packaging must always be consistent.

It is recommended that the volume statement be present on the front label of the multi-pack and be in the same direction as the branding. The unit of measure should be represented in mL or L.

The total quantity of all the packages in the outer package; or the number of the packages contained in the outer package and the quantity of each of those packages be marked – that is in addition to the marking on each individual package.

If the pack is a mixed pack containing beers with different alcohol contents, the range should be shown, for example as 4.3% - 4.8 alc./vol.

It is mandatory to declare the number of standard drinks a beer contains. This can be in the form of a statement “EACH BOTTLE CONTAINS APPROXIMATELY X.X STANDARD DRINKS” or the standard drinks beer glass symbol with the multi-pack quantity preceding it, for example: 6 x “the beer glass symbol” with the correct number inserted. It is recommended that this symbol has a minimum height requirement of 14 mm and have a 3mm clear zone.

6 xMINIMUMHEIGHT14mm - If the pack is a mixed pack containing beers with different alcohol contents it should list all the different standard drinks contained in the pack.

7.3.26 Carton/Shipper

Outer packaging does not require full labelling if it is for transportation and distribution only and is intended to be removed before the product is offered for retail sale. However, it does need to carry:

* the product name
* the lot identification
* the supplier details
* the quantity details.

Other information is permitted but not required. Recommended information e.g. barcode, recycling info and gross weight may also be used as appropriate.

It is recommended that the unit of measure must be represented in mL or L. For example: 4 x 6 x 330mL. It is recommended that the text height of the smallest character be a minimum text height of 5mm.

If the pack is a mixed pack containing beers with different alcohol contents, the range should be shown for example as 4.3% - 4.8 alc./vol.

It is mandatory to declare the number of standard drinks a beer contains. This can be in the form of a statement “EACH BOTTLE CONTAINS APPROXIMATELY X.X STANDARD DRINKS” or the standard drinks beer glass symbol with the carton quantity preceding it, for example: 24 x “the beer glass symbol” with the correct number inserted. This symbol has a minimum height requirement of 14 mm and must have a 3mm clear zone).

Most distribution networks are able to scan ITF-14, GS1-128 and EAN-13 barcode symbologies. However, only EAN-13 barcodes will allow retail carton sales in all retail outlets. It is therefore recommended that EAN-13 barcodes be used on cartons/shippers. The acceptable magnification range for an EAN-13 barcode is 150% minimum up to 200% maximum. We strongly recommend 200% for all printed cartons. The recommended positioning on case 19mm from the right hand side and 32mm from the base.

If the carton is made of recyclable materials, for example cardboard, the Guild recommends that the carton displays a recycle symbol.

# Section 7.4 Logos

Please log in to the Guild website <http://brewersguild.org.nz> and go to the members area to download copies of the logos referred to in this document.