



# **Beverage labelling issues**

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# Outline of talk

- NZJA logo



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Signifies NZJA manufacturers who comply with an industry code of practice.

Use on all products which contain minimum 5% juice

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# Added Vitamin C claims for juices

- Added as Antioxidant or Vitamin?
  - cannot add antioxidant to a juice
- for a juice MUST be in ingredient list as:
  - Vitamin (Vitamin C)
  - Vitamin (ascorbic acid)
  - Vitamin (300)
- this does not constitute a claim
  - but, Vit C claim expected on the label
- if claim, must have Vitamin C in NIP
- recommend Vitamin C level  $\geq$  label claim at best before date

# Added Vitamin C to fruit drinks

- CAN be added and claimed as Vitamin C ONLY if:
  - the drink meets the requirement in Standard 1.3.2, namely:
    - is a fruit or vegetable juice
    - fruit and/or vegetable drink with  $\geq 25\%$  juice
    - fruit cordial or fruit cordial base
- no other drink can ADD Vitamin C, except as an antioxidant

# Added Vitamin C to fruit drinks

- CAN be added as an antioxidant
  - MUST be identified in ingredient list as:
    - Antioxidant (ascorbic acid)
    - Antioxidant (300)
- cannot use the words “Vitamin C” on the label if it is added as an antioxidant

# Vitamin C claims

- It is possible to claim natural Vitamin C
  - cannot be topped up with added Vitamin C unless specifically allowed (1.3.2)
- Maximum **CLAIM** for Vitamin C in fruit juice:
  - 500mg per 200ml for blackcurrant
  - 400mg per 200ml for guava
  - 120 mg per 200ml for other fruit juice
- it doesn't matter how much is actually present



# Vitamin C claims

- Where a food contains more than 1 ingredient, maximum claim is limited to proportion of ingredient
- 5% blackcurrant in 95% apple juice:
  - blackcurrant  $500\text{mg}/200\text{ml} \times 5\% = 25\text{mg}$
  - apple juice  $120\text{mg}/200\text{ml} \times 95\% = 114\text{mg}$
  - therefore, claim can be  $139\text{mg}/200\text{ml}$

# Vitamin C claims

- Where a food contains more than 1 ingredient, maximum claim is limited to proportion of ingredient
- 25% orange juice in water (fruit drink):
  - orange juice  $120\text{mg}/200\text{ml} \times 25\% = 30\text{mg}$
  - therefore, max. claim can be  $30\text{mg}/200\text{ml}$

# Vitamin C claims

- claims on consumer products sold as concentrates must be calculated on the drink diluted ready to drink.
- 25% orange juice cordial in water:
  - say, requires dilution 1:1 before drinking
  - orange juice  $120\text{mg}/200\text{ml} \times 12.5\% = 15\text{mg}$
  - therefore, max. claim can be  $15\text{mg}/200\text{ml}$  in the diluted drink, ready to consume
  - the product has to contain  $15\text{mg} \times 2 = 30\text{mg}/200\text{ml}$  Vitamin C in the cordial as sold, but cannot claim this level

# Vitamin C claims summary

- can add and claim Vitamin C to juices over 25% fruit juice content and claim Vitamin C
- maximum claim reduced with reducing fruit juice content
- for concentrates, only claim max. Vitamin C for the product as diluted ready to consume

# Vitamin C claims

.... more ...

- can claim NATURAL levels of Vitamin C if:
  - they are a claimable food
  - means a food with at least 90% by weight of:
    - primary foods or
    - foods listed in Table to clause 3 of Std 1.3.2
  
    - mixture of primary foods and/or
    - water and/or
    - foods listed in Table to clause 3 of Std 1.3.2  
(except fatty products such as butter, etc)

# Vitamin C claims

.... more ...

- can claim NATURAL levels of Vitamin C if:
  - they are a claimable food
  - reference size (200ml) contains
    - $\geq 10\%$  of RDI [for presence]
    - $\geq 25\%$  of RDI [for good source]
- note: RDI for Vitamin C (Std 1.1.1) is 40mg

# Vitamin C claims .... example ...

- 5% fruit drink can claim Vitamin C
  - provided it is natural (not added)
  - maximum claim is  $120 \text{ mg}/200\text{ml} \times 5\% = 6\text{mg}$
  - 10% of RDI is  $4\text{mg}/200\text{ml}$ 
    - minimum claim is  $4\text{mg} / 200\text{ml}$
- So a 5% fruit drink can claim between 4 and 6 mg Vitamin C per 200ml drink – no more, no less – and none of that can be added.
- Can add ascorbic acid as an antioxidant, but cant claim it as Vitamin C.

# Final word on Vitamin C

- Food Standards say NIP must be average values
- Commerce Commission indicates anything less than label claim is unacceptable / misleading
- Recommendation: use label claim as a **MINIMUM AT EXPIRY DATE**
  - remember Vitamin C is lost during storage in many juices
  - compensate at packing for losses during storage