



# Guidance Document

## Understanding the Labelling Requirements for Eggs and Egg Products

## Title

Guidance Document: Understanding the Labelling Requirements for Eggs and Egg Products

## About this document

Food sold in New Zealand must be labelled in accordance with the Australia New Zealand Food Standards Code as well as other relevant New Zealand legislation. This guidance document explains the labelling requirements for table eggs and egg products and provides information to help egg producers and manufacturers meet New Zealand's food labelling requirements.

## Document history

Version	Version Date	Section Changed	Change(s) Description
1	February 2009	All	New format and branding. Updated wording where necessary to align with changes to the Australia and New Zealand Food Standards Code.
2	April 2018	7.1 Eggs	Updated shelf life for eggs to be 35 days at room temperature as a result of new scientific evidence.

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<b>Contents</b>	<b>Page</b>
<b>1 Purpose</b>	<b>4</b>
<b>2 Background</b>	<b>4</b>
<b>3 Definitions</b>	<b>4</b>
<b>4 How to interpret this document</b>	<b>5</b>
<b>5 When do eggs need to be labelled?</b>	<b>6</b>
<b>6 Labelling requirements</b>	<b>6</b>
<b>7 Best-before date and statement of storage conditions</b>	<b>10</b>
7.1 Table Eggs	10
7.2 Egg products	10
<b>8 Standard Nutrition Information Panel (NIP)</b>	<b>10</b>
<b>9 Claims made on labels</b>	<b>11</b>
9.1 Nutrition content claims	11
9.2 Health claims	11
9.3 False or misleading claims	12
<b>10 Reused or recycled packaging for eggs</b>	<b>12</b>
<b>11 Re-packaging eggs</b>	<b>12</b>
<b>12 Labelling of transportation outer</b>	<b>12</b>

# 1 Purpose

This guidance document explains the labelling requirements for table eggs and egg products and provides information to help egg producers and manufacturers to meet New Zealand's food labelling requirements.

# 2 Background

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 legislation.

The relevant legislation is listed below:

- [Australia New Zealand Food Standards Code \(FSC\)](#);
- [Animal Products Act 1999](#);
- [Animal Products Regulations 2000](#);
- [Animal Products Notice: Specifications for Products Intended for Human Consumption signed 1<sup>st</sup> March 2016 \(HC Spec\)](#);
- [Food Act 2014](#); and
- [Weights and Measures Regulations 1999](#).

# 3 Definitions

(1) In this guidance document, unless the context otherwise requires:

**average quantity** (of a substance in a food) means the average, for such foods from that producer or manufacturer, of:

- a) where a serving or reference amount is specified - the amount of the substance that such a serving or reference amount contains; or
- b) otherwise - the proportion of that substance in the food, expressed as a percentage [FSC 1.1.2]

**best-before date** (for a food for sale) means the date up to which the food for sale will remain fully marketable and will retain any specific qualities for which express or implied claims have been made, if the food for sale:

- a) remains in an intact package during its storage; and
- b) is stored in accordance with any storage conditions applicable under Standard 1.2.6 [FSC 1.1.2]

**egg product** means a product primarily made from all or a portion of the content of an egg, and includes an egg processed in the shell [HC Spec 1.2(1)]

**MPI** means the Ministry for Primary Industries

**NIP** means Nutrition Information Panel

**package** (or packaging) means any container or wrapper in or by which food intended for sale is wholly or partly encased, covered, enclosed, contained or packaged [FSC 1.1.2]. Packages for table eggs include:

- a) fully enclosed egg cartons; or
- b) open egg trays; or
- c) other packaging e.g. paper bags

**RMP** means a risk management programme

**table egg** means a raw egg destined to be sold to the end consumer in its shell [HC Spec 1.2(1)]. In this document, eggs mean table eggs

**transportation outer** means a package, other than a transportation unit, that:

- a) encases any packaged 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 of the product [HC Spec 1.2(1)]

**use-by date** (for a food for sale) means the date after which it is estimated that the food for sale should not be consumed because of health or safety reasons, if the food for sale:

- a) remains in an intact package during its storage; and
- b) is stored in accordance with any storage conditions applicable under Standard 1.2.6 [FSC Standard 1.1.2]

- (2) Any terms or expression used in this Code that is defined in the Act or Regulations made under the Act and used, but not defined, in this guide has the same meaning as in the Act or Regulations.

## 4 How to interpret this document

General requirements and guidance information are differentiated in this document.

A regulatory requirement is identified by having a citation at the end of the relevant sentence or clause and the specific legislation from which the requirement is derived. The word “**must**” is often used to indicate its mandatory status. For example, any processing of table eggs that could compromise the integrity of the shell must be minimised [HC Spec 13.40(2)].

In many cases the mandatory requirements have been paraphrased or reworded using egg examples for context. Operators should refer to the cited legislation for the actual wording of the legal requirement.

Guidance information, indicated by “**should**”, provides explanatory information, examples or options for achieving a particular outcome or requirement. Operators may use alternative methods or measures to those set out in the guidance information provided they do not in any way compromise good operating practices and the achievement of the requirements.

## 5 When do eggs need to be labelled?

In general you must label all packaged eggs and egg products. However, the FSC 1.2.1 allows for some exemptions to this rule. These exemptions apply if you:

- sell eggs unpackaged i.e. loose eggs;
- sell eggs that are packaged in the presence of the purchaser. In other words, if you pack eggs from trays into bags while the consumer is watching;
- sell eggs directly from the farm where they were laid to the consumer; or
- sell eggs at a fundraising event i.e. the funds go to the charity and not to the seller.

You can find more information about the exemptions in [FSC 1.2.1—6](#).

You must provide the following information if a customer asks for it, even if you are exempt from labelling your eggs:

- the name of the food;
- directions for storage; and
- nutrition information (if you are making a claim about the eggs) [FSC 1.2.1—9].

You can write this information on a poster and place it with or near the eggs, or inform customers who ask. You need to make sure the information provided is accurate for the eggs sold.

## 6 Labelling requirements

Eggs and egg products have different labelling requirements depending on the purpose for which they are sold e.g. human consumption for retail, catering or further processing.

Labelling requirements are further explained in Table 1 Labelling of Eggs for Retail, Catering and Other Uses (Eggs that are Not Exempt from Labelling) and Table 2 Labelling of Eggs Products for Retail, Catering and Other Uses (Eggs that are Not Exempt from Labelling).

**Table 1: Labelling of eggs for retail, catering and other uses (eggs that are not exempt from labelling)**

Labelling statements	Eggs for retail	Eggs for catering	Eggs for other uses e.g. further processing
<b>Name of food</b> [FSC 1.2.2—2] e.g. eggs	Required [FSC 1.2.1—8]	Required [FSC 1.2.1—15]	Required [FSC 1.2.1—20]
<b>Lot identification</b> [FSC 1.2.2—3] A date mark and the premises where the eggs were packed is sufficient	Required [FSC 1.2.1—8]	Required [FSC 1.2.1—15]	Required [FSC 1.2.1—20]
<b>Supplier’s name and business (street) address in New Zealand or Australia</b> [FSC 1.2.2—4] ‘Supplier’ includes producer, packer, or vendor	Required [FSC 1.2.1—8]	Not required on the label if this information is supplied in documents accompanying the eggs [FSC 1.2.1—16]	Not required on the label if this information is supplied in documents accompanying the eggs [FSC 1.2.1—20]
<b>Date marking and associated statement of storage conditions</b> [FSC 1.2.5—3 and 1.2.6—2] See <a href="#">Section 7.1 Best-before Date and Statement of Storage Conditions for Eggs</a> for details	Required [FSC 1.2.1—8]	Required [FSC 1.2.1—15]	Not required on label but if requested, suppliers must provide information to enable purchasers to comply with labelling and compositional requirements of the FSC [FSC 1.2.1—21]
<b>Nutrition Information Panel</b> [FSC 1.2.8] See <a href="#">Table 4: Standard Nutrition Information Panel</a> for an example of a standard NIP	Required [FSC 1.2.1—8]	Not required on the label if this information is supplied in documents accompanying the eggs [FSC 1.2.1—15]	Not required on label but if requested, suppliers must provide information to enable purchasers to comply with labelling and compositional requirements of the FSC [FSC 1.2.1—21]
<b>Number of contents, net weight or volume</b>	Refer to the <a href="#">Weights and Measures Regulations 1999</a>		

**Table 2: Labelling of egg products for retail, catering and other uses (eggs that are not exempt from labelling)**

Labelling statements	Retail egg products	Catering egg products	Egg products for other uses
<b>Name of food</b> [FSC 1.2.2—2] e.g. pasteurised eggs, dried eggs, frozen egg yolks	Required [FSC 1.2.1—8]	Required [FSC 1.2.1—15]	Required [FSC 1.2.1—20]
<b>Lot identification</b> [FSC 1.2.2—3] A date mark and the premises where the egg products were packed or prepared is sufficient	Required [FSC 1.2.1—8]	Required [FSC 1.2.1—15]	Required [FSC 1.2.1—20]
<b>Supplier’s name and business (street) address in New Zealand or Australia</b> [FSC 1.2.2—4] ‘Supplier’ includes packer, manufacturer, vendor or importer of the food	Required [FSC 1.2.1—8]	Not required on the label if this information is supplied in documents accompanying the egg product [FSC 1.2.1—16]	Not required on the label if this information is supplied in documents accompanying the egg product [FSC 1.2.1—20]
<b>Date marking and associated statement of storage conditions</b> [FSC 1.2.5—3 and 1.2.6—2] See <a href="#">Section 7.2 Best-before Date and Statement of Storage Conditions for Egg Products</a> for details	Required [FSC 1.2.1—8]	Required [FSC 1.2.1—15]	Not required on label but if requested, suppliers must provide information to enable purchasers to comply with labelling and compositional requirements of the FSC [FSC 1.2.1—21]
<b>Nutrition Information Panel</b> [FSC 1.2.8] See <a href="#">Table 4: Standard Nutrition Information Panel</a> for an example of a standard NIP	Required [FSC 1.2.1—8]	Not required on the label if this information is supplied in documents accompanying the egg product [FSC 1.2.1—16]	Not required on label but if requested, suppliers must provide information to enable purchasers to comply with labelling and compositional requirements of the FSC [FSC 1.2.1—21]



Labelling statements	Retail egg products	Catering egg products	Egg products for other uses
<b>Ingredient list [FSC 1.2.4—4]</b>	Required if more than one ingredient. For all ingredients list: <ul style="list-style-type: none"> <li>• common name; or</li> <li>• description; or</li> <li>• generic name when specified in the FSC.</li> </ul> Use class name of food additives if specified in the FSC, followed by the specific name or code number of the additive [FSC 1.2.1—8]	Not required on the label if this information is supplied in documents accompanying the egg product [FSC 1.2.1—16]	Not required on label but if requested, suppliers must provide information to enable purchasers to comply with labelling and compositional requirements of the FSC [FSC 1.2.1—21]
<b>‘Unpasteurised’ statement</b>	Unpasteurised egg products cannot be sold at retail [HC spec 13.43(2)]	Label on unpasteurised egg products (or food containing them) must advise/state that the product/food contains unpasteurised egg [FSC 1.2.3—2 S9—2]	Label on unpasteurised egg products (or food containing them) must advise/state that the product/food contains unpasteurised egg [FSC 1.2.3—2 S9—2]
<b>Number of contents, net weight or volume</b>	Refer to the <a href="#">Weights and Measures Regulations 1999</a>		

## 7 Best-before date and statement of storage conditions

### 7.1 Table Eggs

MPI recommends a shelf life for clean un-cracked table eggs of 35 days from the date of lay.

The label must include the best-before date and a statement of any storage conditions required to ensure that the eggs will keep for the period indicated [FSC 1.2.6—2]. Examples are given in Table 3 Acceptable Egg Shelf life and Storage Statements.

**Table 3: Acceptable egg shelf life and storage statements**

Storage conditions for eggs	Shelf life claim from date of lay	Storage statement on egg packaging
Eggs are stored at room temperature	35 days	Not required

MPI allows the use of shelf life claims that differ from the options above. If the operator has evidence to show the alternative shelf life period will result in safe and suitable eggs and this is documented in the registered RMP. Operators should consider the temperature that the eggs will be stored at throughout the distribution chain.

For further information refer to [Guidance Document: How to Determine the Shelf Life of Food](#).

### 7.2 Egg products

The label must include a clear statement of any specific storage conditions required to ensure that the food will keep until the use-by or best-before date that appears on the label [FSC 1.2.6—2].

If your product has a shelf life of more than 2 years (e.g. frozen or dried products), a date mark will not be required [FSC 1.2.5—3].

## 8 Standard Nutrition Information Panel (NIP)

The minimum information required in the NIP (when no nutrition content claims or health claims are made) is set out in Table 4 Example of a Standard NIP (Based on One Dozen Size 6 Eggs). The quantities for the 'per serving' or 'quantity per 100 g (or 100 mL)' information must be stated as average quantities. You must state this on the NIP e.g. "average quantity per serving" or "average quantity per 100 g / 100 mL" [FSC 1.2.8—6].

**Table 4: Example of a Standard NIP (based on one dozen size 6 eggs):**

NUTRITION INFORMATION		
Servings per package: 12		
Serving size: 46 g		
	Average quantity per serving	Average quantity per 100 g
Energy	274 kJ	596 kJ
Protein	5.9 g	12.8 g
Fat, total	4.6 g	10.1 g
—saturated	1.4 g	3.1 g
Carbohydrate	0.1 g	0.3 g
—sugars	0.1 g	0.3 g
Sodium	61 mg	133 mg
(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)

## 9 Claims made on labels

You must have supporting evidence for any claims made on egg or egg product labels or on any accompanying documentation [FSC 1.2.7].

More information on nutrition content and health claims can be found on the Australia New Zealand Food Standards website: [Getting your claims right](#).

### 9.1 Nutrition content claims

A nutrition content claim is a claim that states, suggests or implies that food has a general or specific nutritional property e.g. omega-3 enriched eggs. Before making a nutrition content claim:

- check that the FSC allows such a claim and all the conditions to make such a claim have been met; and
- add this extra information to the minimum requirements in the NIP.

### 9.2 Health claims

A health claim is a claim that states, suggests or implies that food (or a property of food) has, or may have an effect on the human body, e.g. protein contributes to the maintenance of muscle mass. Before making a health claim:

- check that the FSC allows such a claim and all the conditions to make such a claim have been met; and
- add this extra information to the minimum requirements in the NIP.

## 9.3 False or misleading claims

Fair Trading Act prohibits the use of any false, misleading or deceptive claims or other representations.

The [Food Act 2014](#) requires all food to be safe and suitable. The suitability of food is dependent on composition, labelling, identification, and condition of the food. The [Food Act 2014](#) prohibits the sale of food with false or misleading claims.

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

## 10 Reused or recycled packaging for eggs

You can pack eggs into reused or recycled packaging provided you:

- ensure that the packaging is visibly clean and undamaged so that it will not contaminate the eggs [HC Spec 7.2(5)]; 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 [HC Spec 8.4(3)].

## 11 Re-packaging eggs

If you, your distributors or any other persons re-package eggs e.g. from bulk trays into cartons, new packs must be fully labelled unless they are exempt from the labelling requirements [FSC 1.2.1—6].

If re-packaging eggs, you need to:

- handle the eggs hygienically and discard any cracked eggs;
- ensure you do not use make up a full pack of eggs unless they are from the same supplier and have the same information (e.g. best-before dates). This ensures that eggs can be accurately traced if there is a food safety problem or complaint; and
- ensure the packaging is visibly clean and undamaged to avoid contamination of the eggs.

If you are using recycled egg packaging refer to [Section 10 Reused or Recycled Packaging for Eggs](#).

## 12 Labelling of transportation outer

If you use transportation outer, it will need to be labelled with:

- a name or description e.g. eggs or egg product;
- storage directions; and
- lot identification (this requirement is optional if lot identification is on the retail packaging) [HC Spec 8.2(3)].

You can be exempt if you can demonstrate prior to completion of process, there are systems in place to ensure traceability is maintained if the eggs or egg products is transferred:

- between sites of a single company or subsidiaries of a parent company; or
- between subsidiaries of a parent company and the parent company [HC Spec 8.2(2)].

If eggs or egg products are to be sold for petfood, the label on the transportation outer must clearly state it is not intended for human consumption [HC Spec 8.2(4)]. Alternatively this information can be provided on accompanying documentation [HC Spec 8.3(1)].