

Allergen Labelling Checklist for South Africa

Identify, declare, qualify and verify: the allergen controls to complete before any label goes to print.

Undeclared allergens are the single most common cause of food recalls. Work through this checklist for every product, every recipe change and every supplier change: before printing.

Step 1: Identify

	Requirement	Reference / note
■	Full recipe reviewed against the South African common-allergen list: egg, cow's milk, crustaceans & molluscs, fish, peanuts, soybeans, tree nuts, gluten-containing cereals (wheat, rye, barley, oats, spelt/kamut)	R146 reg. 43–44
■	Hidden sources checked: flavourings, hydrolysed proteins, lecithin, starches, carriers, processing aids	Supplier specs
■	Supplier specifications and CoAs current for every raw material	FSMS
■	Rework and carry-over mapped for allergen content	HACCP

Step 2: Declare

	Requirement	Reference / note
■	Every allergen present declared by its common name (e.g. 'soya', 'milk', 'wheat gluten')	R146 reg. 43
■	Declared within the ingredient list and/or in a clearly worded 'Contains:' statement	R146
■	Allergen wording consistent across all pack sizes and languages	QA
■	Uncertain ingredient status? Held for verification, not assumed	GMP

Step 3: Precautionary ('may contain') statements

	Requirement	Reference / note
■	'May contain' used only where a documented cross-contact risk assessment supports it	R146; GMP
■	Not used as a substitute for cleaning validation and scheduling controls	FSMS
■	Shared-line and shared-facility risks assessed and recorded	HACCP
■	Statement wording precise (name the allergen: not 'may contain traces of allergens')	Best practice

Step 4: Verify & maintain

	Requirement	Reference / note
■	Free-from claims ('gluten-free', 'dairy-free') supported by laboratory analysis	R146; draft R3337 tightens
■	Label vs recipe reconciliation signed off after every reformulation	Change control
■	Artwork approval workflow includes an allergen sign-off step	QA
■	Annual allergen review scheduled; staff trained on allergen control	R638; FSMS

Need this done for you? Send your label artwork to info@ascfoodsafety.com for a professional compliance review: redlined report, corrected wording and a formal compliance letter. 48-hour express option available. ascfoodsafety.com/labelling-and-regulatory-advisory

This document is a general guide based on South African legislation current at the time of publication (July 2026) and does not constitute legal advice or a compliance certificate. Regulations change: including the pending replacement of R146 of 2010 by the draft R3337 regulations. Always obtain product-specific professional advice. © ASC Food Safety Consultants.