ASC FOOD SAFETY CONSULTANTS

Leading with Science. Ensuring Food Safety.

Health & Nutrition Claims: Quick-Reference Guide

What you can and can't say on a South African food label: with the wording traps that trigger enforcement.

On a South African label, every word is either compliant, risky or prohibited. This quick-reference guide summarises the boundaries under R146 of 2010: and flags where the draft R3337 regulations will tighten them. It follows the same Permissible / Modify / High-risk logic our consultants use in formal claims assessments.

The golden rules

- A label (or advert: the rules apply to both) may not be false, misleading or deceptive, directly or by implication.
- A foodstuff may never claim to treat, prevent or cure a disease or condition.
- Nutrition content claims ('low fat', 'high in fibre', 'sugar-free') are only lawful when the product meets the prescribed compositional criteria: and the nutritional information table becomes mandatory the moment any claim is made.
- If you cannot substantiate it with analysis or documentation, do not print it.
- Words, pictures and implications all count. A picture of berries on a product with no berries is a claim.

Quick-reference table

Claim / wording	Status	Why / what to do instead
'Low fat', 'fat-free', 'high in protein', 'source of fibre'	CONDITIONAL	Lawful only if the product meets the compositional criteria in the claim tables: verify by analysis, then keep the substantiation file.
'Sugar-free' / 'no added sugar'	CONDITIONAL	Distinct definitions with distinct criteria. Verify which one you actually meet; draft R3337 tightens sweetener-related messaging.
'Gluten-free'	CONDITIONAL	Requires analytical substantiation; draft R3337 proposes stricter validation.
'Boosts immunity', 'detox', 'burns fat'	HIGH-RISK	Function/therapeutic-style claims without a permitted basis. Replace with permitted nutrient-content statements where criteria are met.
'Treats colds', 'prevents diabetes', 'anti-inflammatory'	PROHIBITED	Medicinal claims on a foodstuff: never permissible; may also trigger SAHPRA scrutiny.
'Natural', 'pure', 'farm fresh', 'artisanal'	HIGH-RISK	Undefined puffery that regulators and competitors challenge as misleading; use precise, provable statements.
'Energy', 'vitality' taglines	MODIFY	Risk of implied functional benefit; assess against ingredient levels and reposition wording where unsupported.
Comparative claims ('30% less sugar than…')	CONDITIONAL	Must be accurate, complete, verifiable and against a clearly identified comparator.
Endorsement / association logos	CONDITIONAL	Only with current written authorisation from the endorsing body.
Star ratings, 'healthy choice' style badges	HIGH-RISK	Unregulated schemes may mislead; draft R3337 restricts positive-signalling on triggering products.

Before you print: the five-question claim test

	Question	Reference / note
☐	Is the claim on the permitted list / does the product meet the compositional criteria?	R146 claim tables
☐	Can we hand an inspector the substantiation file today (lab results, calculations, references)?	Substantiation
☐	Is the claim consistent across label, website, e-commerce and social media?	R146 applies to advertising
☐	Would the claim survive the draft R3337 criteria as well?	Future-proofing
☐	Has someone independent of marketing signed it off?	Governance

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.