South African Food Label Compliance Checklist

The 60-point first-pass screen our consultants use: R146, APS Act, Legal Metrology and draft R3337 readiness.

Use this 60-point checklist as a first-pass screen of any food label destined for the South African market. It reflects the checks our consultants run under R146 of 2010, the Agricultural Product Standards Act, the Legal Metrology Act read with SANS 289 and related regulations: plus readiness flags for the draft R3337 regulations.

Section A: Mandatory information

	Requirement	Reference / note
■	Name of the food is present, accurate and not misleading (true descriptive name, not only a brand name)	R146 reg. 12–13
■	Ingredient list present, headed 'Ingredients', in descending order of mass (m/m) at time of manufacture	R146 reg. 18
■	Compound ingredients broken down or exempt (<25% and permitted)	R146 reg. 18
■	Added water declared where required	R146 reg. 18
■	All additives declared by class name and name/INS number as required	R146 reg. 18
■	Net quantity declared in metric units, correct position and minimum size	Legal Metrology Act; SANS 289:2022
■	Name and full physical address of manufacturer/importer/seller present	R146 reg. 20
■	Country of origin declared ('Product of…', 'Produced in…' as applicable)	R146 reg. 36
■	Date marking present, correct format and correct type (best before / use by / sell by)	R146 reg. 26–29
■	Special storage instructions provided where the product requires them	R146 reg. 30
■	Batch / lot identification present and traceable	R146 reg. 25
■	Instructions for use present where the food requires preparation	R146

Section B: Allergen declarations

	Requirement	Reference / note
■	All common allergens present in the product are declared: egg, cow's milk, crustaceans & molluscs, fish, peanuts, soybeans, tree nuts, and gluten-containing cereals (wheat, rye, barley, oats, spelt/kamut)	R146 reg. 43–44
■	Allergens declared by common name within or alongside the ingredient list	R146 reg. 43
■	Precautionary 'may contain' statement used only where a documented risk assessment supports it	R146; GMP
■	Undeclared allergen risk assessed for rework, shared lines and supplier changes	HACCP / FSMS

	Requirement	Reference / note
■	'Gluten-free' or similar claims substantiated by analysis	R146; draft R3337 tightens

Section C: Nutritional information & claims

	Requirement	Reference / note
■	Nutritional information table present where required (mandatory when any claim is made)	R146 reg. 48–51
■	Format: per 100 g/ml plus per single serving; correct nutrient order	R146
■	NRV percentages calculated correctly against current Nutrient Reference Values	R146
■	Values verified by lab analysis or documented, defensible calculation	R146
■	Every nutrition claim ('low fat', 'high in protein', 'sugar-free') meets the compositional criteria	R146 claim tables
■	No prohibited claims: treats/prevents/cures a disease; 'slimming'; misleading health language	R146 reg. 7; FCD Act
■	Endorsement logos and schemes used only with authorisation	R146
■	Comparative claims substantiated and not misleading	R146
■	Marketing copy, website and e-commerce listings consistent with the label	R146 (applies to advertising)

Section D: Format & legibility

	Requirement	Reference / note
■	All mandatory information in English (additional official languages optional)	R146
■	Minimum font sizes met; adequate contrast against background	R146 reg. 14
■	Mandatory particulars not obscured by graphics, folds or seams	R146
■	Pictures/illustrations do not mislead as to nature, origin or composition	R146 reg. 10
■	'Serving suggestion' qualifier used where imagery shows items not in the pack	R146

Section E: Product-specific & import checks

	Requirement	Reference / note
■	Product-specific standards checked (e.g. dairy, meat, fruit juice, honey grading & marking)	APS Act 119 of 1990 (DALRRD)
■	Compulsory specifications met for regulated products (e.g. canned fish/meat)	NRCS VC specs
■	Category regulations checked (e.g. soft drinks R.1769/1985 as amended; sweeteners R.733 of 2012)	DoH
■	Added caffeine above 150 mg/L: mandatory warning and declaration present	R.1769 as amended
■	Imported labels fully localised (not merely over-stickered, unless compliant)	R146; Port Health practice
■	Import permits in place where required (DALRRD / ITAC); documentation pack ready for Port Health	Import control
■	GMO declaration made where thresholds are met	Consumer Protection Act regs

Section F: Draft R3337 readiness flags (not yet law: prepare now)

	Readiness action	Reference / note
■	Product profiled for added sugar, sodium and saturated fat against proposed warning-label thresholds	Draft R3337
■	Pack design has space reserved for front-of-pack warning triangles if triggered	Draft R3337
■	Marketing reviewed for child-directed elements (characters, toys, appeals) on triggering products	Draft R3337
■	Claims portfolio re-screened against stricter draft criteria	Draft R3337
■	Reformulation options costed vs relabelling for triggering SKUs	Strategic
■	Regulatory watch in place for final publication and transition periods	ASC advisory

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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.