

R3337 Readiness Gap-Assessment Checklist

Score every SKU against the draft regulations: warning-label exposure, claims at risk, marketing restrictions.

The draft R3337 regulations: published for public comment in 2023 and expected to replace R146 of 2010: represent the biggest change to South African food labelling in a generation. They are not yet law, but the direction is clear: front-of-pack warning labels, restrictions on marketing to children, and stricter claims. Score every SKU now, while there is still time to reformulate instead of relabel.

Portfolio exposure assessment

	Assessment item	Reference / note
■	Nutrient profile completed for every SKU: added sugar, sodium and saturated fat per 100 g/ml	Draft R3337
■	SKUs mapped against the proposed warning-label thresholds (products exceeding limits will carry warning triangles)	Draft R3337
■	Artificial sweetener content flagged (proposed warning-label trigger)	Draft R3337
■	Warning-label exposure quantified: how many SKUs, what % of revenue	Strategic
■	Reformulation vs relabelling decision made per triggering SKU, with costs	Strategic

Marketing & claims exposure

	Assessment item	Reference / note
■	Child-directed marketing audit: cartoon characters, toys, competitions, school marketing on triggering products	Draft R3337
■	All current claims re-screened against the stricter draft criteria (nutrition, health, gluten-free)	Draft R3337
■	Products carrying warning labels checked for claims that would become prohibited alongside warnings	Draft R3337
■	Pack redesign brief prepared: space for warning triangles on principal display panel	Design
■	Digital assets (website, e-commerce, social) included in the claims re-screen	R146/draft R3337

Organisational readiness

	Readiness action	Reference / note
■	Regulatory watch assigned: someone accountable for tracking final publication and transition periods	Governance
■	Budget provision made for artwork changes across the portfolio	Finance

	Readiness action	Reference / note
■	NPD pipeline screened so new launches are R3337-ready by design	NPD
■	Key suppliers and co-manufacturers briefed on coming changes	Procurement
■	Board/exco briefed with a costed transition roadmap	Governance

ASC runs portfolio-wide R3337 gap assessments: SKU-level exposure, warning-label mock-ups, reformulation options and a costed transition roadmap your board can act on.

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.