

**JOINT FAO/WHO FOOD STANDARDS PROGRAMME****FAO/WHO COORDINATING COMMITTEE FOR NORTH AMERICA AND THE SOUTH WEST
PACIFIC***12th Session, Madang, Papua New Guinea***19 – 22 September 2012****DISCUSSION PAPER ON A HARMONISED APPROACH TO DATE MARKING****(prepared by New Zealand)****Background**

1. At a FAO/WHO sponsored workshop held in Tonga in September 2010 in conjunction with the 11th session of the Coordinating Committee for North America and the South West Pacific (CCNASWP), the date marking of prepackaged foods was identified as an area of food labelling that was of particular concern in the Pacific. The CCNASWP agreed to a proposal from New Zealand to facilitate consideration of a harmonized approach to date marking in the region through the development of a discussion paper for consideration at the next session of the Committee in 2012.

Objective

2. To promote an effective, enforceable and harmonized approach to date marking in the Pacific region based on Codex guidelines to address issues raised by Pacific Island Countries.

Problem Definition

3. Pacific Island countries (PICs) are concerned that pre-packaged food products for sale in their countries are either not date marked, inadequately date marked or the date mark present is not relevant to the product due to freezing. The consequences of this are:

- Food safety may be compromised
- Food quality may be less than ideal
- There may be non-compliant food products for sale
- Foods may be removed from sale unnecessarily

4. Over recent years there has been a move towards a harmonised approach to date marking of prepackaged foods within the Pacific region with most countries now following Codex. However some PICs do not have clearly defined national laws in relation to date marking. In those countries which do have date marking laws, the laws may not be consistent.

5. The issue of date marking of pre-packaged foods in PICs is compounded by the fact that many rely heavily on imported foods. Many of the processed foods, which are a significant part of the diet, are imported. Three major issues arise:

- The date marks of imported food products are often inconsistent with any local requirements.
- If date marked, products are often close to their expiry date. The PICs are concerned that they may be a dumping ground for substandard food products.
- Many meat products are imported frozen, with a date mark that relates to the product prior to it being frozen, and has therefore little relevance to the frozen product. This creates problems for regulators in PICs with regard to the safety and suitability of these products.

6. The PICs are, however, wary of adopting a strict stance towards the date marking of imported foods because they do not wish to jeopardize the security of their food supply. If date marking requirements are seen as too onerous by international food exporters there is a risk that the exporters will withdraw from these relatively small markets rather than comply.

7. Although there has been significant movement towards harmonisation of the regulation of date marking across PICs there does not appear to be a consistent use of terms for date marking across the PICs. A wide range of terms including 'best before', 'expiry date', 'use by', 'production date', 'sell by date' are currently in use. This may lead to misinterpretation of the different date marks and resultant inconsistent enforcement. For example foods with a date mark signifying a loss of quality but not safety may be sold after the expiry of the date, whereas foods with a date mark that signifies the date after which the food is not safe to eat must not be sold after that date. The use of the same term to date mark for both loss of safety and loss of quality creates uncertainty as to whether foods can be sold past their date mark. This is seen as a problem by PICs.

8. While the immediate problem is the impact on the PICs, inconsistent date marking is not just a local issue. Although internationally many countries use Codex Standards and Guidelines to develop their national legislation, the current Codex guidance on date marking does not provide adequate guidance with definitions being identified as being ambiguous. This may be part of the reason why many of the countries exporting foods to the PICs have different date marking requirements and hence different date marks on their food products being imported into PICs. This paper aims to develop options to address the issues raised above. These options look at what is feasible and realistic to undertake in the Pacific context in order to address these issues.

9. To assist with the preparation of this paper, New Zealand circulated a questionnaire about the current date marking requirements among the Pacific Island members of CCNASWP in December 2010. Samoa, Cook Islands, Tonga, Solomon Islands, Federated States of Micronesia (FSM) and USA responded. A copy of the questionnaire is attached as **Annex 3**. The respective answers to the questionnaire are compiled in a table which is attached as **Annex 4**.

Options

10. Note these options are not mutually exclusive. To some extent the options represent a staged approach with option 1 being a less complex version of option 2.

Option 1 – Monitoring date marking for a set period of time and report back to CCNASWP

11. This option would involve either;

Option 1A - Monitoring date marking across all products for a set period of time to identify and record key issues.

Or

Option 1B - Selecting two products identified as being particularly problematic with regards to date marking and monitoring the date marking of these products for a set period of time to identify and record key issues.

Option 2 – A common system for date marking, trialled on two nominated products across all PICs.

12. A proposed system for date marking to be adopted across the Pacific has been developed. This system has been devised to take account of the existing requirements in the Pacific Island nations, harmonise as much as possible with the Codex guidelines on date marking, and the Australia New Zealand Food Standards Code. A harmonised approach to date marking across the Pacific region would ensure a critical mass in respect of requiring compliance. As a combined group, the countries of the region constitute a bigger market. If all the countries of the region have the same requirements it will be simpler for importers to comply. Harmonising as much as is practical for PICs with the current requirements in Australia and New Zealand adds significantly to the creation of a critical mass for the region in terms of a significant export market.

13. The system requires a 'use by' date on foods, which pose a health or safety risk before they visibly spoil and a 'best before' date on products where quality decreases after a certain date. The full details of the proposed system can be found in **Annex 1**.

14. To address the issue (raised by PICs) of too short a shelf life remaining after food is imported, and the potential risk of PICs becoming a 'dumping ground for substandard food products', it is proposed that PICs trial imposing a requirement that a minimum time period/s remain before the date marked expires at the time the food is imported. It is proposed that information be drafted that could be sent to importers in the individual PICs to distribute to their suppliers outlining these proposed requirements. It would be the responsibility of the importer to check that products they import meet the proposed requirements when they receive them. To derive the benefits of consistency and critical mass countries should adopt the same minimum time period/s. The time periods may differ for different food categories but should be applied consistently across the Pacific countries to maximise the benefits of a critical mass.

15. In order to address the issue of date marking on frozen meat being reflective of the fresh shelf life of the product rather than the shelf life of the frozen product information on original (fresh product) shelf life, date of freezing and storage conditions post freezing may be required. This information should be readily available from exporters of the meat. Importers could request this information if they know their order will arrive frozen.

Pilot of proposed harmonised approach

16. To test both the effectiveness of the proposed date marking system and the feasibility of PICs implementing such a system it is suggested that two pre-packaged food products of significant consumer and regulatory interest in the region are chosen and the system applied to these two products and monitored for a set period of time. Based on the outcome of the pilot for these two products the system could be reviewed and decisions made on whether such a system could be usefully rolled out more broadly to cover other / all pre-packaged foods in the region. From feedback provided at the workshop (May 2011) and the responses to the questionnaire, it is proposed that frozen meat and canned fish are the foods proposed for the pilot trial. .

17. The pilot would trial the proposed date marking system on these two foods for a set period of time (to be determined). It is proposed that issues relating to the implementation of the pilot trial be discussed at the pre CCNASWP workshop in September 2012. **Annex 2** list possible issues for discussion.

Development of additional guidance material

18. To facilitate the implementation of a date marking system there may be a need to develop some guidance materials. This guidance material could include information on determining the date of minimum durability, along with issues that arise during the pilot project. Some guidance materials do exist in countries who implement date marking now and this may be able to be used as a basis for guidance materials for date marking across the Pacific.

Determining the date of minimum durability

19. An issue for declaring a date mark is the determination of the date itself. Determining the date is the responsibility of the manufacturer. For imported foods it is assumed that the country of export has the necessary facilities to determine the date. In the case of domestically produced foods there may not be appropriate facilities to test durability. New Zealand has guidance material which may be a useful basis to develop guidance for PICs. Practical issues with respect to available facilities would need to be considered in developing such guidance.

20. Should option 2 be undertaken an evaluation of the pilot project should be considered by the Committee to determine whether the proposed harmonised approach is effective in addressing the issues raised by PICs in relation to date marking and whether the approach should be rolled out to all/other foods.

CCFL discussions

21. At the 40th session of the Codex Committee on Food Labelling (CCFL) New Zealand tabled a conference room document outlining the date marking issues being experienced in PICs and proposing to write a discussion document outlining potential issues with the current Codex provisions relating to date marking and ideas for new work on date marking for CCFL consideration at its 41st session in May 2013. The New Zealand proposal received wide support and was endorsed by the Committee. New Zealand is currently preparing this document. This document will look at the current Codex texts related to date marking (namely the *General Standard for the Labelling of Prepackaged Foods*, specifically the *definitions for use in Date Marking of prepackaged food* and section 4.7 of this Standard) to identify areas where clarity

could be improved to reduce ambiguity. This paper will include the issues raised via CCNASWP by the PICs.

22. It is hoped that the discussion document will result in new work by the CCFL to address the issues raised. Increased clarity and reduced ambiguity in the Codex texts on date marking could assist in greater consistency in interpretation of these texts and therefore more consistency in date marking practices globally.

23. PICs will have the opportunity to participate in this work of the CCFL both at committee and working group levels.

24. Any experiences to come out of implementation of options 1 or 2 of this paper (should they be undertaken) could feed into PICs participation in the CCFL work.

Proposed next steps

25. It is recommended that:

- a. CCNASWP considers the options presented in this paper and indicates their preferred course of action for possible implementation in the PICs;
- b. CCNASWP assists the PIC members of the region to implement the preferred option as a pilot project; and
- c. CCNASWP encourages the PICs to participate in the proposed CCFL work on revision of the Codex date marking provisions.

Annex 1**PROPOSED HARMONISED APPROACH TO DATE MARKING OF FOOD IN THE PACIFIC**

Date marking is the declaration of the period of minimum durability of a food, after the expiry of which the food becomes either unsafe to consume or loses specific qualities.

Definitions

The definitions of the terms used in this proposed system are:

- **“Prepackaged”** means packaged or made up in advance in a container, ready for offer to the consumer, or for catering purposes.
- **“Use-by date”** means the date which signifies the end of the estimated period, if stored in accordance with any stated storage conditions, after which the intact package of food should not be consumed because of health and safety reasons.
- **“Best-before date”** means the date which signifies the end of the period during which the intact package of food, if stored in accordance with any stated storage conditions, will remain fully marketable and will retain any specific qualities for which express or implied claims have been made.

Food products which require date marking

All pre-packaged foods where the food should be consumed before a certain date because of health and safety reasons must be date marked. (Note the exceptions below do not apply when the food should be date marked for health and safety reasons)

All other pre-packaged food requires a date mark except

- Foods with a shelf life of two years or more;
- Fresh fruits and vegetables which have not been peeled, cut or similarly treated;
- Wines, including liqueur wines, sparkling wines, aromatized wines, fruit wines and sparkling fruit wines;
- Beverages containing 10% or more by volume of alcohol;
- Bakers' or pastry cooks' wares which, given the nature of their content, are normally consumed within 24 hours of their manufacture;
- Vinegar;
- Food grade salt;
- Solid sugars;
- Confectionary products consisting of flavoured and /or coloured sugars;
- Chewing gum;
- Food in a small package;
- Individual portions of ice cream or ice confection.

Terminology to be used for date marking

“Use by” where foods must be consumed before a certain date for health and safety reasons. These are foods that become microbiologically unsafe to eat before they visibly spoil (see Appendix 1 for decision tree to determine whether a “use by” date is needed). These foods must be date marked with a “use-by” date

“Best before” on all other pre-packaged food that is required to have a date mark (see above exceptions). These are foods where specific qualities of the food decrease or deteriorate after a certain date but they do not become unsafe to eat before they visibly spoil.

(Note: This differs from the Codex Alimentarius *General Standard for the Labelling of Prepackaged Foods* which uses the words “best before” where the day is indicated and “best before end” in other cases.)

How the date mark should be expressed

The date mark shall be declared by the words “use by” or “best before” as the case may be. The words “use by” or “best before” shall be followed by the date or a reference to where the date is located on the label.

The date mark must consist of at least -

- the day and month for products with a date of minimum durability of three months, or
- the month and year for products with a date of minimum durability of more than three months.

For foods with a shelf life of less than 3 months the date mark shall be in numerical form with the day/month/year (dd/mm/yyyy) in that order. For example a date mark of 13th January 2015 would be expressed as 13/01/2015 or 13/01/15. The month may be expressed in letters e.g. 13 Jan 2015 if this helps avoid consumer confusion.

Where the shelf life is more than 3 months the date mark may be express as the month and year only. For example 01/15, 01/2015 or Jan 2015.

Storage directions

If the food must be stored is a particular way to ensure it lasts to the end of its shelf life the label must declare directions for storage in addition to the date mark. For example if a food must be refrigerated to keep until the end of date marked period, this must be stated on the label.

Note: the date mark applies to the unopened package. Once the food is opened the date mark no longer applies.

Prohibition on sale of food after the ‘use-by’ date

Food must not be sold after its ‘use-by’ date.

Food with an expired ‘best-before’ date, is permitted to be sold provided the food is not spoiled and complies with any other applicable legislation, e.g. it is not damaged, deteriorated or perished to an extent that affects its reasonable intended use, or it is not unsound or unfit for human consumption.

Requirement for a minimum period before the expiry of a date mark when the food is imported.

The date mark on food imported for sale to Pacific Island Countries must not be within **[how long?]** of that food’s date mark. **(Decide on this minimum period and on which foods this should apply to)**

Frozen meat [imported or domestically produced? Or both?] must provide on the label, in addition to the date mark, the date on which the product was frozen. This date must be **[time to be determined]** before date mark on that product. This should help ensure the thawed product has a useful shelf life remaining once the product is thawed.

Responsibility for date marking

It is the responsibility of the supplier of the food to ensure that the food is date marked. In the case of domestically produced foods the supplier is deemed to be the manufacturer. In the case of imported foods the supplier is deemed to be the importer.

Penalty for non-compliance

Food not complying with the date marking requirements shall not be permitted to be sold.

- If a food that is required to be date marked does not have a date mark it is non compliant and cannot be sold.
- If an imported food has a date mark that will expired within **[time to be determined]** at the time it arrives in the country of import it is non compliant and cannot be sold (To avoid dumping of food this should be determined prior to export from the country of manufacture)

Appendix 1 - Determining which foods require a “use-by” date and which foods require a “best-before” date

“Use-by” date:

Foods that may become microbiologically unsafe before the food visibly spoils should be labelled with a “use by” date. Note: foods which spoil before posing a food safety risk do not require a “use by” date as they will look ‘off’ and should not be sold anyway (is it an offence in PICs to sell food that is visibly spoiled?)

Ready to eat chilled foods may need to be labelled with a use by date because they are not further processed before eating to destroy any food poisoning bacteria that may be present.

- may contain food poisoning bacteria that will grow at refrigeration temperatures;
- will support the growth of food poisoning bacteria that may be present to dangerous levels before the food has noticeably spoiled; and
- will not be cooked or otherwise processed to make it safe before being eaten.

The bacteria of concern are those that will grow at refrigeration temperatures. These are:

- *Listeria monocytogenes*;
- strains of *Bacillus cereus* which will grow at refrigeration temperatures;
- strains of *Clostridium botulinum* which will grow at refrigeration temperatures; and
- *Yersinia enterocolitica*.

If you manufacture any chilled ready-to-eat food you must determine if your product could contain any of these bacteria and, if so, whether the product would support bacterial growth.

“Best before” date:

All pre-packaged foods not required to bear a ‘use by’ date should be labelled with a “best before” date except:

- Foods with a shelf life of two years or more;
- Fresh fruits and vegetables which have not been peeled, cut or similarly treated;
- Wines, including liqueur wines, sparkling wines, aromatized wines, fruit wines and sparkling fruit wines;
- Beverages containing 10% or more by volume of alcohol;
- Bakers’ or pastry cooks’ wares which, given the nature of their content, are normally consumed within 24 hours of their manufacture;
- Vinegar;
- Food grade salt;
- Solid sugars;
- Confectionary products consisting of flavoured and /or coloured sugars;
- Chewing gum.
- Food in a small package
- Individual portions of ice cream or ice confection

Annex 2**POSSIBLE FRAMEWORK OF PILOT PROJECT**

It is proposed that the pilot project be voluntary. This will avoid requiring legislation to be available (or developed) to implement a mandatory system before the pilot is implemented, however some of the details need to be checked:

Foods: It is proposed that frozen meat and tinned fish are used for a pilot of the proposed system.

- Are these foods suitable for the pilot project?
- Will they provide the opportunity to assess the effectiveness of the proposed harmonised approach?
- Are they easy to implement the proposed approach on given additional guidance material will not be developed before the pilot is implemented?

Time Frame: We suggest the pilot is implemented as soon as possible after the 2012 session of the CCNASWAP to allow a good trial period prior to assessing the outcome at the 2014 session of the CCNASWAP.

Non-compliance: What action, if any, will be taken in respect of non compliances? How should non compliant foods already in the market place before the commencement of the pilot be handled?

Communication: key parties need to be informed well in advance of pilot to give them time to prepare. How will this be communicated? To who?

Monitoring and follow up: The project will need to be monitored throughout and data collected so that the effectiveness of the proposed system can be evaluated. Systems for monitoring and evaluation will need to be established before the projects starts. Decisions on what data will need collecting and who will do this need to be made.

Annex 3

17 December 2010

From: New Zealand

To: Pacific Island members of CCNASWP

CCNASWP QUESTIONNAIRE RE DATE MARKING

(Reply requested by 21 January 2011)

Background: At the CCNASWP workshop held in Tonga in September 2010 the date marking of food labels was identified as a food labelling area presenting particular problems. National governments have applied a diversity of approaches to date marking of food products and there is no consistency in either the date marking requirements or their enforcement within the region.

Countries are concerned that food products with expired date marks are being offered for sale. The practice of altering the storage conditions of foods prior to sale, for example freezing of baked or chilled goods to preserve freshness for transportation or because they have been over ordered, often invalidates the date mark on the foods. The problem is made more complex because much packaged food available for sale is imported into the countries.

Objective: to promote a harmonised approach to date marking of food across the Pacific region

Purpose of the paper: to identify whether a simple, practical date marking system can be developed for the Pacific region.

Proposal: A pilot study of two staple commodities is proposed to ascertain if a model regime could be implemented and would be effective.

Questions:

1. Name two packaged food products which are widely consumed and are of significant importance to the majority of consumers in your country.
2. Please outline the current requirements, if any, for date marking in your country.

For example:

Does your country have mandatory date marking?

What products does the date marking apply to? What products do not require date marking?

What terminology is used? "Use by" "Best before" "Baked on"?

Is date marking required for health and safety reasons only or also required for quality reasons?

If date marking is used for both safety and quality reasons is the same terminology used for these?

Is there any requirement as to how is the date expressed? E.g. day/ month/ year, month/ year, month/day/year?

Is the month expressed in words or numbers?

Is food permitted to be sold after the expiry of the date marked?

How is the date to be marked decided and who decides this? E.g. manufacturer, retailer, government/authority?

3. Is compliance with any date marking requirements monitored and enforced?
4. Are there any particular problems with date marking in your country?

Annex 4

	Samoa	Cook Islands	Tonga	Solomon Islands	Federated States of Micronesia	Papua New Guinea	Fiji	Kiribati	USA	New Zealand/Australia
1. Name 2 packaged food products widely consumed and of significant importance to the majority of consumers in your country.	Chicken quarters & lamb flaps	Meat and dairy products	Chicken and tin fish, Rice, milk (all types: condensed, baby milk, powdered, liquid)	Instant Noodle, Rice, Canned (Fish & Corned Beef)	Frozen packed chicken leg quarters				Product dating most useful on refrigerated entrees, raw meat and poultry and eggs	
2. I Does your country have mandatory date marking?	No except for recently approved Egg Standard, into force 10.5.11. All other products are imported with date marking.	No still in the process	Yes, as stipulated under Schedule 1 of the Consumer Protection Regulations 2006.	Yes, under Solomon Islands Pure Food (Food Control) Regulations 2010 gazetted Nov 2010	Yes (Food labelling regulation 1994, food labelling law 2006	Mandatory. Food Sanitation Act	Yes, mandatory	No. Has Food Act but no regulations	Federally, only for infant formula. Some states require date marking of certain foods	Yes. Std 1.2.5 ANZ Food Standards Code
II. What products does the date marking apply to?		The standard requires all packaged foods with a shelf life of less than 2 years to be date marked in accordance with the Codex standard	The product labelling standard provided under the Consumer Protection Regulation 2006 applies to all goods other than the sale of fresh produce, gas, electricity, water and communications.	All 'high risk' food products, i.e. dairy products & poultry	Codex Standard - Prepackaged food products	Codex Standard – prepackaged foods	Codex Standard – prepackaged foods		Infant formula	Packaged foods with a best before date of less than 2 years.
III. What products do not require date marking?				Low risk products: fresh fruits & vegetables not peeled, cut or similarly	Fresh fruits and vegetables, wines containing >10% alcohol,					Packaged foods with best before date 2 years or more Small packages

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				treated; wines, beverages containing >10% alcohol, bakers wares normally consumed within 24 hours, vinegar, food grade salt, solid sugars, confectionary products of flavoured coloured sugars, chewing gum	bakery products usually consumed in 24 hours, vinegar, food grade salt, solid sugars, confectionary products of flavoured and/or coloured sugars					except where should be consumed before certain date for health/safety Individual portions ice cream. Unpackaged foods, fresh fruits & vegetables, food made & packaged on premises from which it is sold, Food packaged in presence of purchaser, Food delivered packaged ready for consumption at express order of purchaser, Food sold at fund raising event, Food packaged & displayed in assisted service display cabinet
IV. What terminology is used?	“Use by” for Egg Std.	Use by, best before and expiry date	Used by date, best before date or expiry date	Use by, best before baked on depending on level of risk posed to consumer	Expired date, manufactured date, sell by date, date of packing, date of minimum	Expiry date, use by, best before	Use by, best before	Imported products date marked ‘best before’ ‘use by’ ‘expiry date’, ‘production	Use by	Use by, Best before, baked on, baked for

	Samoa	Cook Islands	Tonga	Solomon Islands	Federated States of Micronesia	Papua New Guinea	Fiji	Kiribati	USA	New Zealand/Australia
					durability, used by date.			date'		
V. Is date marking required for health & safety reasons only or also for quality reasons?	Recognition and emphasis is now on both health and safety reasons.	Best before is used for quality	It is required for health and safety reasons as well as for quality reasons.	Health & safety reasons & for quality reasons	quality				Health & quality reasons	Health & safety reasons, and quality reasons
VI. If date marking is used for both health & safety and quality reasons is the same terminology used?	Not determined yet.	Use by for health reasons and best before for quality and health	Yes	Use by for safety, best before for quality	quality					No. Use by is for health & safety reasons. Best before is for quality reasons. Baked on/for is for bread with shelf life less than 7 days
VII. Is there any requirement as to how the date is expressed?	For Egg Std day/month/year	Yes, in the food regulations yet to be passed. The date in uncoded numerical sequence and the month may be indicated by letters.	No	Yes, date to be in numerical sequence.	Yes. Date shall consist of day and month for products with minimum durability of < 3 months. Month and year for products with minimum durability of > 3 months. Day month year in numerical sequence. Month may be in letters	As in codex. Day/month/year	Month/year	Day/month/year	Month and year	Yes. Day & month for products with best before/ use date by 3 months or less. Month & year for products with date more than 3 months. Express in uncoded numerical and chronological form other than month with may be expressed in letters.
VIII. Is the month	numbers	Words..in present draft	There is no clear provision under	Requirement for month to	Month may be in letters	Month in numbers	Month in numbers or		Do not specify	Month may be expressed in

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expressed in words or numbers?		and it may change.	the legislation to determine how the month should be expressed.	be in words	where use will not confuse consumers		letters			numbers or letters
IX. Is food permitted to be sold after the expiry of the date marked?	No.	No to Use by, and maybe at a given time to best before products.	No	Not state in Regs (is gap) so as in Pure Food Act	Grey area. National law food may not be imported with expiration date passed. State laws may or not allow for sale.	Not permitted			No	Sale not permitted after expiry of Use by date. Permitted after expiry of best before date.
X. How is the date to be marked decided and who decides this?	Government	To follow Stds already set by Codex	The Manufacturer	Manufacturers set manufacturing date requirements for quality reasons	Manufacturer				Manufacturer, packer or distributor based on tests or other information	Code is silent. In practice manufacturer decides based on tests or other information
3. Is compliance with any date marking requirements monitored and enforced?	Egg Std is enforced at border by Customs and domestically by the Ministry of Health.	Yes, it's a routine monitoring and surveillance by health protection officers in the Ministry of Health .	Yes it is monitored and enforced by both the Customs Department at the border and by the Ministry of Labour, commerce & Industries	Domestic manufacturers comply. Imported food products do not. The new set of Imported Food guidelines are still in draft format under the new gazetted Food control Regulation 2010.	Yes at national level				Varies among States	Yes. In NZ enforced by MAF (Food Safety). In Australia – by states & territories.
4. Are there any particular problems with date marking in your	Lack of enforceable legislations due to lack of regulations.	Yes. Foreign labels on products/ language barrier.	There is increasing alleged breach of the product labelling	Expiry dates. Translating the new date marking on the cans/	Lots foods arrive in country already expired. This	Different languages. Act says should be in English			Viewed as quality issues not safety so no particular problem	Some issues with altering date marks where storage conditions

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country?			standards and product safety standards provided under the Consumer Protection Regulation 2006. However, due to limitations in the enforcement capacity of the Ministry, monitor of compliance with the labelling standards are restricted hence posing threat to health and safety of consumers.	packets by inspectors.	is dumping of unsafe and low quality food products. Imported products come in with lots different date marks					changed.