

Australia



Legal framework

When it comes to exporting foodstuffs to Australia, it is necessary to examine carefully the local food standards.

Most product categories are regulated by specific standards. For example, **meat products**, **cereal** based foodstuffs and **mineral water** are governed by meticulous rules.

Furthermore, general regulations contain punctual guidelines regarding food labeling, such as the compulsory nutritional facts table, which differs from European, USA and Canadian standards.

Australian legislation is also rigorous with regard to the information about the country of origin as well as the local importer of the product.

Scientific framework

Nutrition labeling is mandatory and it is regulated by a specific section of the Food Standards Code (Standard 1.2.8 - Nutrition Information Requirements). This section has been recently updated and the changes will apply from 1st March 2016. The updates are not referred to formal and substantial presentation of nutritional information, but mainly consist of the addition of details and clarifications to the text previously in force.

In the field of Food Safety, the Food Standards Code contains specific sections dedicated to the hygienic characteristics of foods, such as microbiological limits, maximum residue levels (MRLs), limits for chemical and biological contaminants. These sections of the Code have been recently updated with application from 1 March 2016.

Linguistic framework

The official language for food labels is English. English is spoken in the Commonwealth of Australia but some indigenous Australians still speak in their native languages. A considerable proportion of first- and second-generation migrants are bilingual. The English language belongs to the Germanic group of the Indo-European family of languages. The spoken and written language differs according to the geographical area.

by
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Brazil



Legal framework

Brazil belongs to Mercosur (Southern Common Market), namely a trade union of some South American countries, whose goal is the realization of a common market.

Mercosur has issued various regulations in the food sector, such as the **labeling of prepackaged foodstuffs and mandatory nutrition labeling**, which have a remarkable complexity and differ from European and U.S. legislation on this matter.

In addition to these common provisions, Brazil also has a variety of domestic food standards, such as those that regulate the industry sector of pasta, flour and various other product sectors.

A careful analysis of the regulations of Mercosur and of the local law is therefore essential for exporting food products to Brazil.

Scientific framework

Brazil is regulated both by rules shared by the countries belonging to the Mercosur and by national standards. Nutrition labeling is mandatory. The technical standard

regarding the correct presentation of nutrition information is complex and articulated: it provides precise rules for the definition of "portion", for the energy calculation and the rounding of nutritional values, as well as the use of defined tables for the formal presentation of nutrients.

As to food safety, Brazil has national standards dedicated to chemical contaminants, microbiological contaminants and pesticide residues.

Linguistic framework

The official language for food labels is Portuguese.

The Portuguese (**português**) language belongs to the Romance language family.

On 2009 the **Acordo ortográfico da língua portuguesa** (Portuguese Language Orthographic Agreement) officially entered into force in Portugal and Brazil.

This agreement states **new orthographic rules** for the nations whose official language is Portuguese and which make part of the Community of Portuguese-Speaking Countries (CPLP): Brazil, Portugal, Angola, Mozambique, Cape Verde, Guinea-Bissau, São Tome and Principe and East Timor.

The reformed Portuguese orthography has enlarged the alphabet including foreign letters, has eliminated some capitalizations at the beginning of the words, as well as the mute consonants. The agreement eliminates most acute accents, and establishes guidelines for the use of hyphens and dieresis. Despite the orthographic changes every country keeps its own phonetic peculiarities.

Following the entry into force of the agreement, a transitional period for the implementation of the changes was established. In Brazil the implementation of the changes became mandatory starting from 1 January 2016.

by
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Canada



Legal framework

The Canadian market has a legal framework substantially different from the food regulations of USA and the European Union. Therefore, a food product that fulfills the requirements to be exported to the USA not necessarily complies with Canadian regulations. Even if the product is successfully marketed in the United Kingdom or France with a label written in English and French, it could encounter problems to be sold in Canada.

Canadian food regulations are a “middle way” between US and EU legislation.

The nutrition facts table is regulated in a way similar, but not identical, to the US, while the regulations regarding the indication of the ingredients are closer, but still not equivalent, to those applied in the European Union.

Therefore, exporting to Canada requires a completely different process than exporting to France and the UK or the US.

For example, the legal denomination of **pasta** in Canada differs from the wording established by USA legislation and from the denomination used in the United Kingdom and France.

There are also specific regulations for some product categories, such as **foodstuffs enriched with vitamins and minerals**, which have to follow precise and meticulous rules.

Scientific framework

Mandatory nutrition information to be inserted on the label, the rules for the use of nutritional claims and those on the declaration of functional/health claims were published for the first time in 2003 in the *Food and Drugs Act*.

In 2015 the Canadian Authorities opened a period of public consultation in order to update the current legislation. The proposed amendments to the regulation include the update of labeling in general, the introduction of new requirements for the Nutrition Facts Table (including portions) and the review of the conditions of use of claims. Following the future definitive publication in the Official Gazette a transitional period of five years is expected for the compliance of labels to new principles.

Food safety is ensured by specific rules such as the *Pest Control Products Act* for the maximum residues of pesticides and the standards established by the *Canadian Food Inspection Agency* for various types of contaminants such as mycotoxins, accidental contamination, etc.

Linguistic framework

As established in the Federal law *Loi sur les langues officielles* (in force since 1988), Canada has **two official languages**: English and French. French is the first language in Quebec and in some zones of New Brunswick, Manitoba, Yukon and Ontario. Three quarters of the Canadian population speak English as their first language. Some cities, like the Capital Ottawa, are bilingual.

The labeling texts of foodstuffs must be written in English and French. **Any information or claim written in either English or French must also appear in the other language.**

French is a Romance language of the Indo-European family. French is written with the 26 letters of the Latin alphabet, with two ligatures, <œ> and <æ>, and diacritics, such as: à â ç è é ê ë ì î ï ô ù û ü. There are many orthographic rules and the grammar has a lot of verbal moods and tenses.

The English language belongs to the Germanic group of the Indo-European family of languages. The spoken and written languages differ according to the geographical area. The most important varieties are British and American English. Canadian English is part of American English but keeps some features of British orthography and vocabulary and has a significant French influence.

by
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China



Legal framework

Generally speaking, the Chinese food law system is quite complex and composite, there are nonetheless several fields where the lack of regulations constitutes a substantial problem. For example, some ingredients are not recognised even though they have been in use in Europe for a long time. The Chinese government pays a lot of attention to the international collaboration on the standardization of food products, so the legislative system is quite transparent and it is very helpful for the interpretation and application of the Chinese food law and regulations.

Due to the constant high-developed Chinese economy and the continuous growth of imported food, Chinese food law system is undergoing a period of deep transformation. Therefore, the companies exporting the food products to China have to **keep controlling the changes constantly**.

Scientific framework

Nutrition labeling became mandatory on 1 January 2013, after the publication of the relative standard in October 2011. The standard defines the mandatory and optional requirements for nutrition information that have to be inserted on the label, rounding rules of nutrients and different graphic formats for nutrition tables. It also establishes allowed nutritional claims and their conditions of use.

Food safety is also guaranteed by many “vertical” standards for specific product categories, as well as general standards (pesticides, heavy metals, radioactivity, etc.).

Linguistic framework

In China, the official language for the labelling of food products is **Chinese mandarin, so called simplified Chinese**, while in Taiwan and Hong Kong the situation is different. In Hong Kong, the official languages are English and Chinese mandarin, but Hongkongese speak in Cantonese and write in English and traditional Chinese, which is quite similar to the classic Chinese characters. The differences between traditional and modern Chinese manifest both on the written characters and on the usage of the words. However, the traditional Chinese used in the Hong Kong area is slightly different from the one in Taiwan area, because in the first one there are many colloquial Cantonese words and old geographic names in their written language that do not exist in Chinese mandarin.

Chinese language has two independent systems, written and spoken language. As for spoken language, Chinese is a tonal language with a large number of homophonic words and compound words; as for the written part, Chinese is very analytical. Chinese characters are structured in six different ways. Most of them consist of two fragments, phonetic and semantic ones, and often the semantic part is Chinese radical. The number of radicals is limited, so even though there are almost 90,000 Chinese characters, most of them share the same radical. This means that among them there are some connections and some common meanings. Among all these characters, there are about 2500 basic vocabulary and 1000 secondary common characters.

by
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Japan



Legal framework

When it comes to exporting foodstuffs to Japan, it is necessary to examine all local food standards carefully. The national food code which contains all food regulations is the "Food Sanitation Law".

Most food products are governed by specific laws according to the product category involved. This is the case of **fish products and cereal-based** foodstuffs, especially soy products.

The allowed food additives are listed in the rules under each product category and there are substances which are forbidden in Japan but are allowed in the European Union.

Moreover, general food laws contain detailed indications about food labeling, including the exact position of the mandatory wordings that must appear on the packaging.

Scientific framework

Starting from April 1st, 2015 Japan introduced the mandatory nutritional information and fixed a 5-year period to enable everyone to comply with new rules. To date, there are no specific rounding rules of nutritional values or methods to define portions. The Ministry of Health, Labor and Welfare also set the rules to use nutritional claims such as "contains ...", "rich in ...", while functional claims / health benefits have to be notified and approved by the Ministry.

As for food security, the Ministry of Health, Labor and Welfare is in charge of setting and updating all limits established for pesticide residues, traces of radioactivity, contamination of heavy metals and microbiological limits.

Linguistic framework

The official language for food labels is Japanese. It is composed of a mixture of two syllabary alphabets and ideograms. The syllabary alphabets are composed of 45 syllables each: the Hiragana syllabary is used for prefixes and suffixes, while the syllabary Katakana is stricter and primarily used to write foreign words, plant and animal names, and for emphasis. Another peculiarity of Japanese language is its large quantity of homophones, onomatopoeias, foreign words and implied subjects.

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South Korea



Legal framework

When it comes to exporting foodstuffs to South Korea, it is necessary to examine local food standards carefully.

The national food code contains all food regulations. Most food products are governed by specific laws according to the product category involved. The **allowed food additives** are listed in the rules under each product category and there are substances which are forbidden in South Korea but are allowed in the European Union.

As for labeling, there are detailed regulations on the mandatory wordings that must appear on the packaging.

Scientific framework

It is a very complex and constantly evolving regulatory system. In fact, relevant amendments are published frequently and all this further complicates the legal framework and its applicability. Nutrition labeling is compulsory only for certain product categories, such as bread and bakery products, oils and fats, beverages, jams and chocolate, as well as for products for which claims are quoted on labels, and for particular food categories such as foods for special medical purposes. The standard also provides rounding rules, standardized tabular formats, methods of portion expression and claims statement.

The Korean Ministry of Agriculture is the authority in charge of food safety. Health parameters for chemical contaminants, microbiological contaminants, maximum limits for residues of plant protection products and veterinary drugs are defined by specific rules.

Linguistic framework

The official language for food labels is **Korean**. Due to the strong cultural influence of China, the Korean language contains many Chinese words. Korean is an agglutinative language, namely nouns are obtained by linking a single stem and prefixes and suffixes in order to express different grammatical categories.

by
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Russia



Legal framework

Exporting foodstuffs to Russia is very complex. Russian legal system contains specific rules for almost every product category.

Food regulations are meticulous and rigorous, most of them are “legacy” provisions of Soviet Union law and, therefore, are not in line with European legislation. However, in the last few years a process of revision of national standards has been implemented together with the publication of supranational standards by the Eurasian Economic Commission (EEC) – Customs Union, which to date includes Russia, Belarus, Kazakhstan, Armenia and Kyrgyzstan.

Moreover, **the sanitary regulations are detailed and severe**, with hygiene and sanitary aspects that impose strict limits to bacteria in food.

Another factor to consider is the protectionism with regard to imported products; Russian authorities control meticulously the products entering into the market.

Scientific framework

Nutrition labeling is mandatory and it is regulated by a standard of the Customs Union. The rule of 2011 came into force on 1 July 2013 and the transitional period for adapting to the new rules ended on 15 February 2015. It sets mandatory nutrition information, how to present information and rounding rules for nutrients.

It also provides nutritional claims and their conditions of use.

Food Safety is now guaranteed by specific and rigorous parameters established by a technical regulation of the Customs Union. This regulation combines all the legal limits in force (excluding pesticides) for the safety of foodstuffs. Food Safety is regulated also by single “vertical” standards relating to specific product categories (e.g.: olive oil).

Linguistic framework

The official language for food labels is **Russian**.

The Russian language (русский язык) is an Indo-European language, belonging to the East Slavic family. This is the largest native language in Russia and many of the former Soviet republics.

Russian is written using a modified version of the **Cyrillic alphabet**. It contains 6 vowels and a rich consonant system; the consonants typically come in plain vs. palatalized pairs, which are traditionally called hard and soft. There are **six cases** in Russian: nominative, genitive, dative, accusative, instrumental, and prepositional. The first fourth cases are the same as in Latin and the instrumental and prepositional cases are typical of Slavic languages. The **verbs** are conjugated in two moods: indicative and imperative; and three tenses: past, present and future. Most verbs come in pairs, one with imperfective or continuous connotation, the other with perfective or completed action.

by
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Slovenia



Legal framework

Even though Slovenia has been part of the European Union for a long time, its internal laws still contain many "legacy" provisions of Soviet Union law that were inherited when it was dissolved.

It follows that the level of standardization with European Community regulations and respect for the free circulation of goods must often take into account the surviving national food regulations that still discipline most product categories.

Therefore, a company that wants to export to Slovenia, must first study its national regulations in addition to European law.

Scientific framework

As an EU member, Slovenia applies the EU Regulation No. 1169/2011 establishing that nutrition information are mandatory for all foods, with exceptions for certain categories such as unprocessed products, coffee and spices. The deadline for adapting to EU rules is 12th December 2016 for products that do not state claims and for products that currently do not show

nutritional information on the label. Although to date the European Commission has not defined precise rounding rules or special methods for the expression of the portion, the publication of official acts that clearly define these aspects is expected shortly. However, the Directorate General for Health and Food Safety in 2012 published interpretive guidelines of the European regulation regarding tolerances and rounding of data.

The safety and hygiene of food is regulated at European level uniformly: specific regulations and directives establish the maximum limits of chemical contaminants, microbiological contamination, veterinary drugs and heavy metals. However, there are national differences that should always be taken into account, especially when the European rules leave space for interpretation or specific references are absent.

Linguistic framework

The official language for food labels is Slovene.

The Slovene language is a South Slavic language but has many characteristics of Northern Slavic languages; this is the reason why it is considered a link between both linguistic groups. The most similar languages to Slovene are Serbo-Croatian and Slovak. There is a large amount of German loanwords, which are remnants of the German reign.

Nouns, adjectives and pronouns are declined into **six cases** (nominative, genitive, dative, accusative, locative, and instrumental). Slovenian nouns are divided into 3 genders (masculine, feminine, and neuter), and three numbers singular, plural and dual; the latter being used when referring to two people or things.

by
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United Arab Emirates



Legal framework

The food legal system in the UAE follows the principles of the common legislation of the Gulf countries, whose technical regulations are called "Gulf Standards".

There are regulations not only on labeling and advertising, but also on several specific food products, such as **pasta, coffee, and meat**.

As regulations on both these products are more complex and detailed than in most of European countries, it is recommended to carry out a careful legal analysis before exporting them.

In addition to the common legislation of Gulf countries, United Arab Emirates has domestic regulations, such as those on the

maximum durability of some food products.

These regulations are stricter than both Gulf Standards and EU food law.

It is therefore important to know such regulations in order to avoid customs blocks due to a shelf life that exceeds the allowed one.

Alcohol is strictly forbidden in supermarkets. However, it is widely available at many restaurants and bars in Dubai and in most tourist hotels.

Consumption of pork is strictly forbidden in Islam, meaning that pig meat in all its forms is illegal in many Islamic countries. Nevertheless, a number of supermarkets in Dubai have areas dedicated to pork and the products are signposted as being for "Non-Muslims only".

Scientific framework

The nutrition declaration became mandatory in 2012, the year of publication and entry into force of the "Gulf Standard GSO Requirements for nutritional labeling" that defines the mandatory and optional rules for presentation and realization of nutrition information. Another Gulf standard of 2013 defines the nutritional and health claims admitted, as well as the conditions for their use.

Food safety is guaranteed by "horizontal" and "vertical" standards related to specific food categories. Finally, "Halal" certification is mandatory for products of animal origin and food containing ingredients of animal origin.

Linguistic framework

The official language of food labels is Arabic.

The Arabic language belongs to the Semitic group.

The Arabic alphabet contains 28 letters that change their graphic layout according to the position in the word (isolated, initial, middle, end). There are short and long vowels. The short form is usually omitted, but it can be indicated by lines or signs over the consonant.

There are no capital letters and no distinction between cursive and block capital. Both adjectives and nouns have declension. There are three cases - nominative, accusative and genitive. Arabic is written

from right to left. For this reason, it is difficult to manage electronic texts for the graphic realization of products labels.

Arabic language can be divided into two versions

Modern Arabic and Classical Arabic. Classical Arabic is the official language

and it is the language of the Quran. Classical Arabic does not change and it is the only way for one to learn Arabic language academically. It is used in formal situations, news, newspaper, books, academic researches and study books. As classical Arabic is most used in written context, Modern Arabic is used in the daily spoken contexts

by
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USA



Legal framework

The food legislation of the United States market is profoundly different from Europe's and, for this reason, is extremely difficult and complex to deal with.

There is a Code of Federal Regulations with a huge general part on labeling, in addition to numerous standards for individual product categories.

Labeling standards are especially complex, in particular as regards the obligatory format of the **nutrition facts table**, which is radically different from the European one; and then there are regulations for weights and measures and the appearance of the label that define minimum character heights and the obligatory positioning of certain texts in determined **visual fields**.

There are many "vertical" standards that range from **alimentary paste** (macaroni products) to tomato derivatives and affect many typical exports.

Therefore, it is essential that companies study the law before exporting to the United States.

Finally, it should be kept in mind that the United States is a federation in which each federated state enacts its own internal laws that often require authorizations for several categories of in-coming products, such as, for example, **mineral water**.

However, there are also obligatory entry procedures for food products at a federal level, such as the registration required by the Bioterrorism Act or the obligatory registration of canned vegetables and their plants of origin in a database.

Scientific framework

The USA were the first country to make in 1993 the declaration of nutritional table on the label mandatory, thus defining rules and formats clearly. Today, after more than twenty years from its first publication, the *US Food and Drug Administration* proposed a significant revision of the legislation. The process of updating started in March 2014 and the deadline for public comments on the draft law was extended several times.

Many innovations may be introduced with the new standard, in particular:

1. the declaration of "added sugars" in the nutritional table
2. the updating of portions to make them more adherent to the amount of food actually consumed during a meal
3. the declaration of potassium and vitamin D in the nutritional table, while the declaration of vitamin A and vitamin C will become optional
4. the revision of the graphic format for the nutrition table

It is expected that the final version of the law will be published during 2016 and that there will be a long transitional period for the compliance of labels to new provisions.

The provisions of the Code of Federal Regulations (CFR), the US Food and Drug Administration (FDA) and the Environmental Protection Agency (EPA) guarantee sanitary aspects. They cover all aspects related to food safety, such as maximum limits allowed for chemical contaminants, mycotoxins, limits of pesticides, as well as levels of alert (Action Levels) for some substances which are not covered by specific rules.

Linguistic framework

The official language for food labels is American English.

The most significant differences between American and British English are the pronunciation (American r is stronger) and the vocabulary. Spelling, intonation and accents have no substantial differences.

Some examples of **differences between spelling and vocabulary** with regard to food products are:

Spelling

American E.	British E.
Color	Colour
Flavor	Flavour
Specialty	Speciality
Favorite	Favourite

Vocabulary

American E.	British E.
Candy	Sweet
Chicory	Endive
Cookie	Biscuit
French fries	Chips
Zucchini	Courgette

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