Ministry for Regulation
Te Manatū Waeture

Summary of Engagement Report

Product Labelling Regulatory Review

Contents

Executive Summary

On 21 July 2025, Cabinet agreed that the Ministry for Regulation (the Ministry) will undertake a review of regulations relating to product labelling in 2025 (the Review) [CAB-25-MIN-0234.01 refers]. Following Cabinet approval, the Ministry undertook targeted engagement with businesses and industry groups to understand perspectives on product labelling pain points across import, export, and domestic sectors, and across a range of product types. The purpose of this engagement was to inform the terms of reference.

Key themes from the engagement are highlighted below to provide an overview of product labelling across several categories using detailed stakeholder feedback.

Summary of what's working well

Seamless Trade Agreement
The Trans-Tasman Mutual Recognition Arrangement enables smooth trade between New Zealand and Australia.

Clear Regulatory Guidance
FSANZ and MPI provide clear, practical guidance documents aiding subject matter experts (SMEs) in understanding labelling requirements effectively.

Effective Labelling Components
Nutrition Information Panels and ingredient statements are well understood and effectively communicate product details to consumers.

Summary of cross-sector issues

Regulatory Complexity and Fragmentation
Multiple agencies set overlapping labelling requirements and offer unclear guidance, resulting in duplication, confusion, and inefficiency. Enforcement is not always consistent.

Cost of Compliance
Label change costs are high, creating significant operational burdens for businesses. Frequent label changes, relabelling and testing are expensive.

SME Compliance Challenges
SMEs face disproportionate compliance costs and lack technical support for navigating regulations effectively.

International Alignment
There is a lack of and/or limited alignment with major trading partners.

Digital Labelling Enablement
Industry wants regulatory clarity on when digital formats are acceptable. Current rules limit the use of QR codes and e-labels, restricting digital labelling benefits for mandatory information.

Summary of sector specific issues

Food & Beverages
Strict regulations cause over-labelling and re-labelling. Rapid implementation timelines for labelling changes increase operational burdens and costs, reduce flexibility, and impact on innovation and costs. There are export challenges and international misalignment.

Hazardous Substances & Chemicals
Different regulatory interpretations of Global Harmonisation Standards (GHS7) by HSNO and HSWA create confusion and compliance challenges for hazardous substances. There is also inconsistent enforcement, Safety Data Sheet authorship issues, multi-regulator confusion and issues relating to alternative pathway processes, especially affecting domestic products and creating compliance risks.

Dietary Supplements
Export restrictions and fragmented regulations complicate operations in the supplements sector.

Over the Counter (OTC)Medicines
OTC regulations create barriers to harmonisation with other countries, particularly Australia.

Access and Alignment with International Standards
Businesses struggle to obtain updated standards; there are outdated domestic regulations and limited access to Standards NZ. Compliance suffers due to misaligned standards, especially for small businesses.

Summary of sector specific issues cont.

Cosmetics and therapeutic goods
Regulatory definition differences cause confusion and increase compliance challenges. The Agricultural Compounds and Veterinary Medicines (ACVM) Act requires some therapeutic products to be registered as veterinary medicines, limiting importation options, cross-border barriers, and duplication of labels.

Other Products: Frequent changes (ACVM), misaligned standards (clothing, organics), traceability issues (building products).

Summary of improvement suggestions

Harmonisation Across Jurisdiction
Aligning labelling frameworks with trusted trading partners reduces duplication and facilitates international trade.

Digital Innovation in Labelling
Implementing QR codes and e-labelling improves consumer access and reduces packaging waste.

Proportional Regulatory Requirements
Applying proportional rules for minor changes and low-risk products streamlines compliance efforts.

Support and Transparency
Stakeholders want longer transition periods, SME support, and improved governance to enhance implementation and trust.

Acknowledgement and Privacy

The Ministry would like to express gratitude to all the stakeholders, experts and others who took the time and spent resources to make submissions or to meet with the Product Labelling Review team. The Ministry has removed names and other identifying details from the information presented in this Summary of Engagement (this report).

Where there was a small number of stakeholders in a particular category, we have been mindful to ensure comments cannot be attributable to a particular party. If you have concerns with how submissions have been reflected, please contact us at: reviews@regulation.govt.nz.

Additionally, if you submitted and would like a copy of the personal information we hold about you, or want to correct that information, please make a Privacy Act request in writing to: privacy.officer@regulation.govt.nz.

The Ministry's guide to making Privacy Act requests can be found here.

Context and Purpose

This report presents a summary of the quantitative and qualitative information received by the Product Labelling Regulatory Review (the Review) during engagement. It is a synthesis of stakeholders' views and opinions, and therefore will not fully reflect the views of any one submission, nor has it been fact-checked.

This summary is also not the Ministry's view on any product labelling regulatory system. The information received through this engagement process is currently being analysed alongside other evidence to inform the Ministry's findings and recommendations.

Our engagement approach

We targeted around 120 stakeholders, including importers, exporters, manufacturers, retailers, packaging and labelling businesses, industry groups and representative bodies.

These stakeholders were selected based on their:

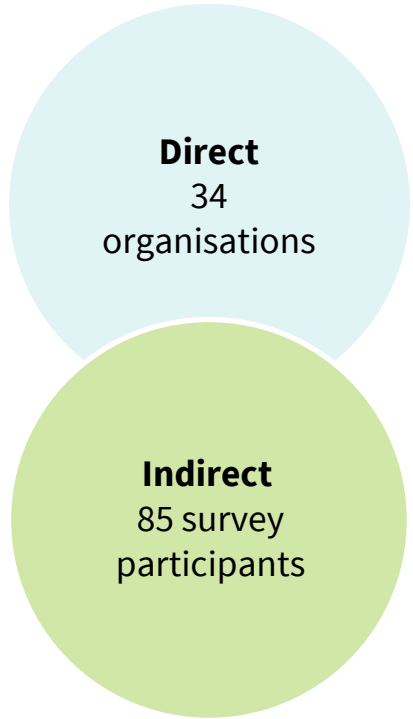
- particular interest in the topic of the review
- insights and knowledge to share about problems or opportunities
- well-established business networks.

Engagement activities included:

- **Direct: Targeted meetings** with a smaller groups of stakeholders who had specific expertise or experience relevant to the review.
- **Indirect: An online questionnaire**, distributed to stakeholders who were asked to complete and share with their networks. The questionnaire was passed onto other organisations not targeted, through this process. This approach was designed to reach small and medium-sized businesses as well as larger players. We note that where we refer to "submitters" in this document, we are referring solely to those who completed the questionnaire.

The findings from engagement informed our advice on potential focus areas and next steps for the review.

Part 2 of this report provides information about the demographic profiles of entities which responded to the questionnaire to provide context regarding the perspective of the feedback.

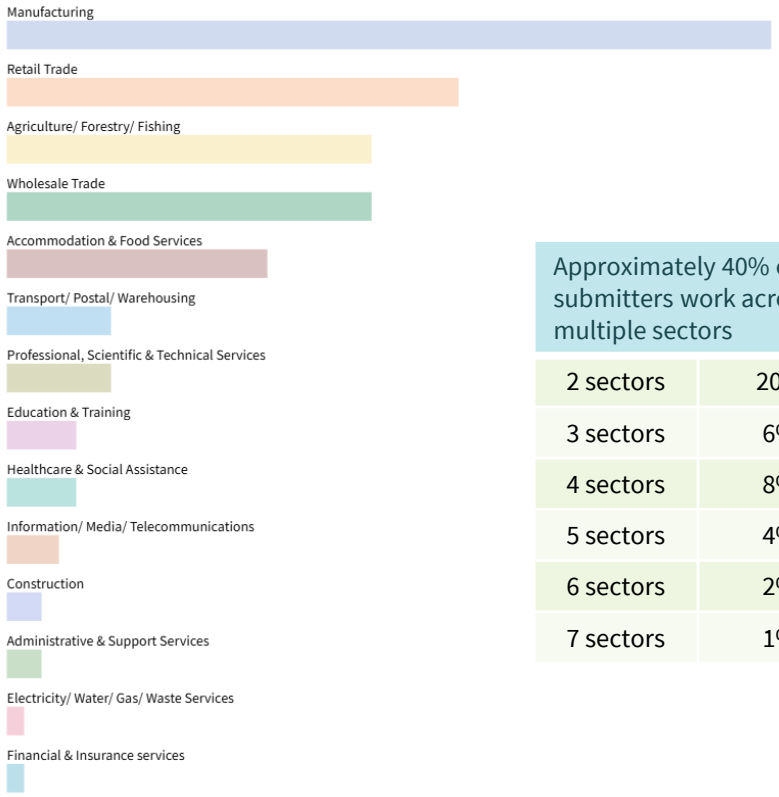


Part 2:

About the Survey Respondents

Who responded to the online questionnaire?

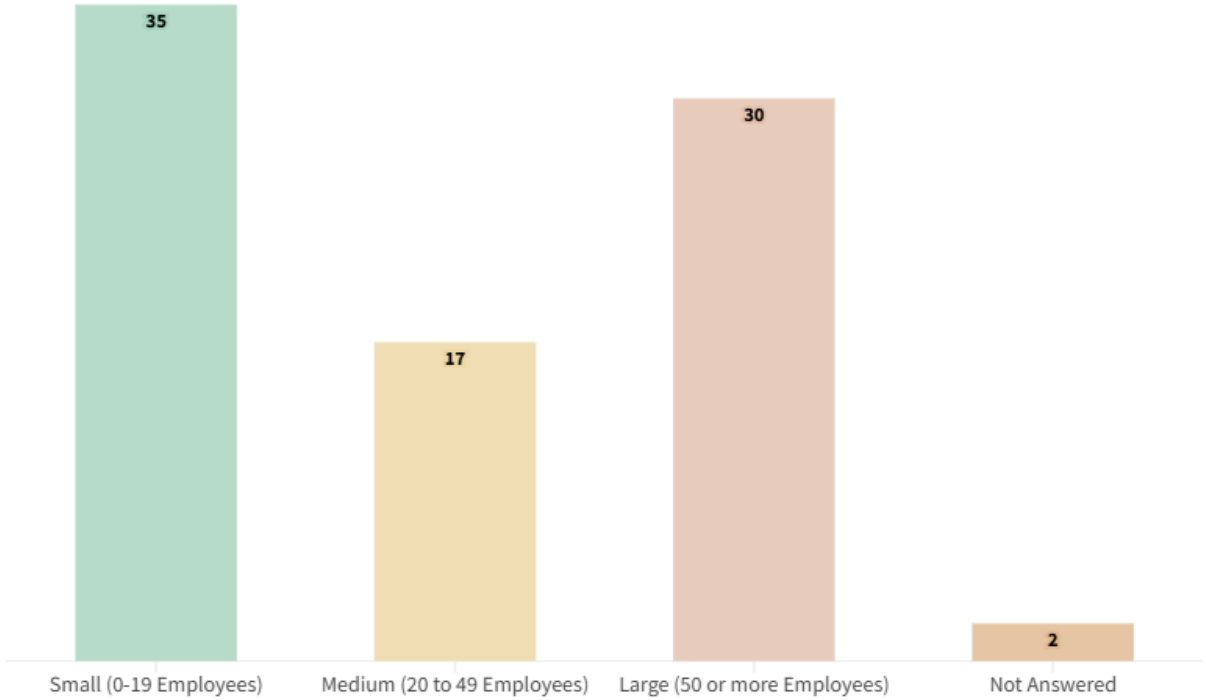
The top two sectors we heard from were manufacturing and retail



Approximately 40% of all submitters work across multiple sectors	
2 sectors	20%
3 sectors	6%
4 sectors	8%
5 sectors	4%
6 sectors	2%
7 sectors	1%

Note: Sector classifications follow the high-level ANZSIC codes.
Introduction | Australian Bureau of Statistics

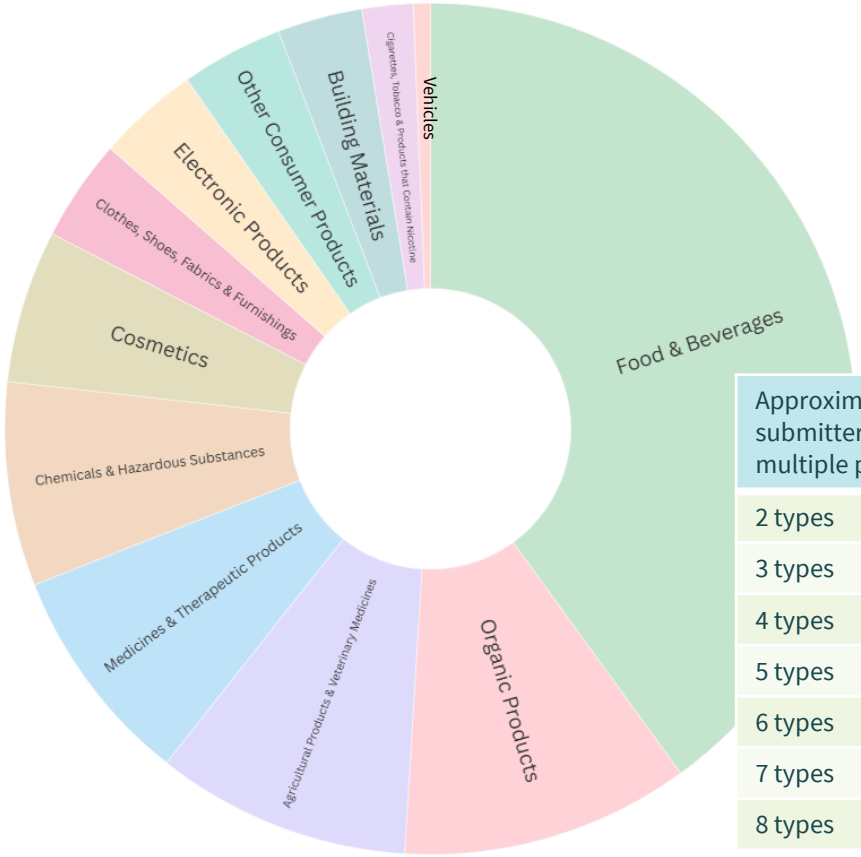
A range of business sizes responded to the survey



Note: Business size groupings are based on the StatsNZ business demography designations.
StatsNZ business demography package

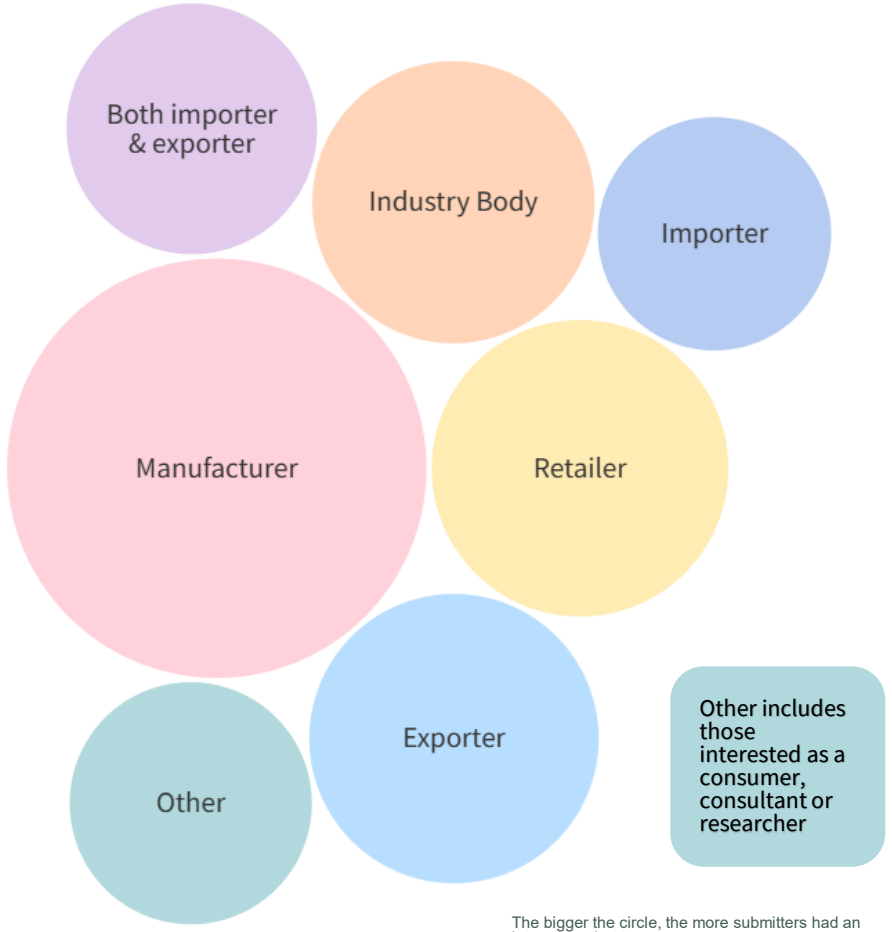
What did submitters tell us about their businesses?

Most submitters' businesses sold food and beverage…



Approximately 40% of all submitters handle multiple product types	
2 types	16%
3 types	7%
4 types	2%
5 types	1%
6 types	11%
7 types	0%
8 types	1%

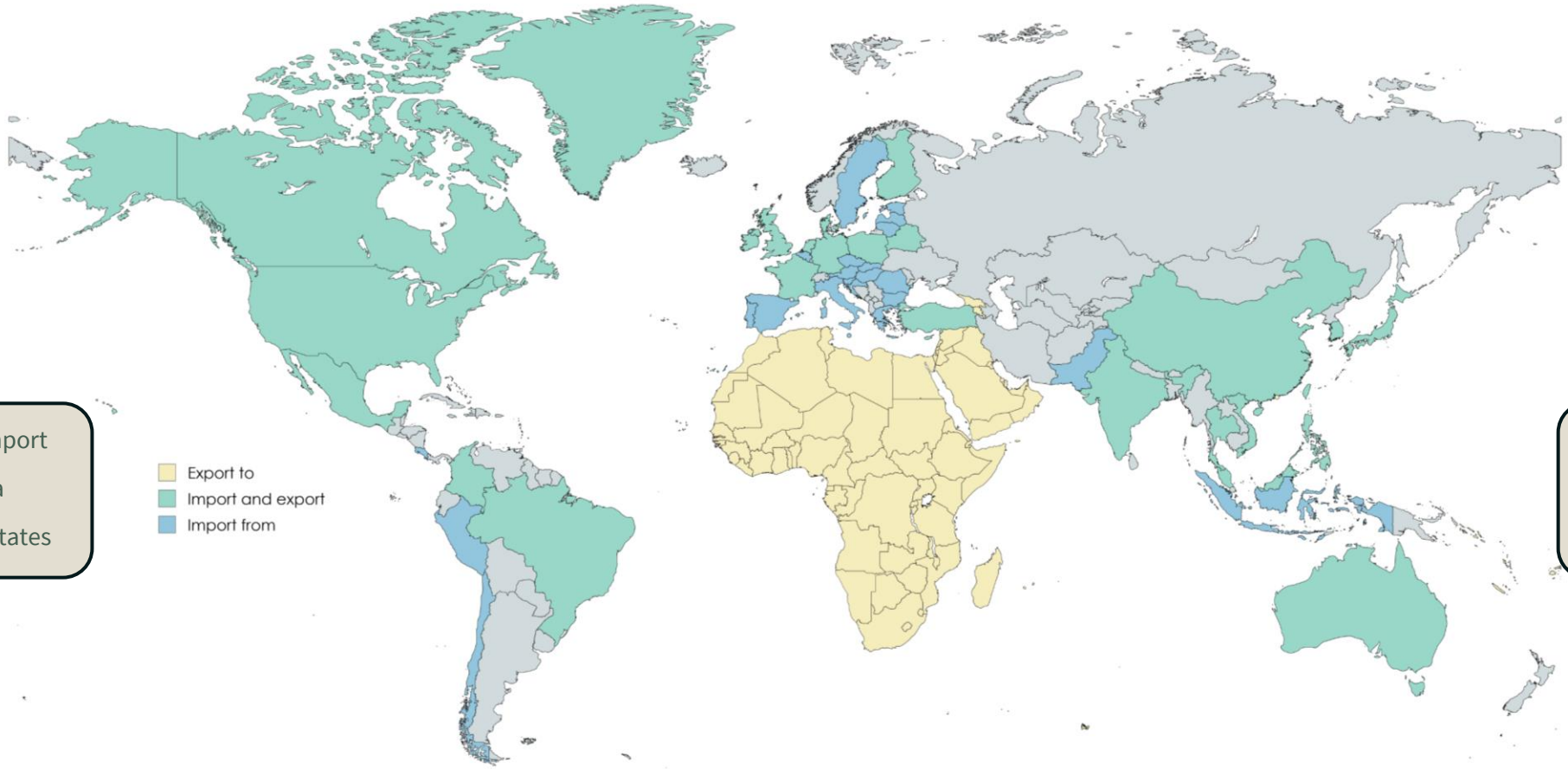
And were interested as a manufacturer of products



The bigger the circle, the more submitters had an interest as that type.

Where are submitters importing from and exporting to?

Top three import regions:
Australia
China
The United States



Top three export regions:
Australia
The United States
The United Kingdom

Our submitters generally import and export to the same top countries as other New Zealand businesses.*

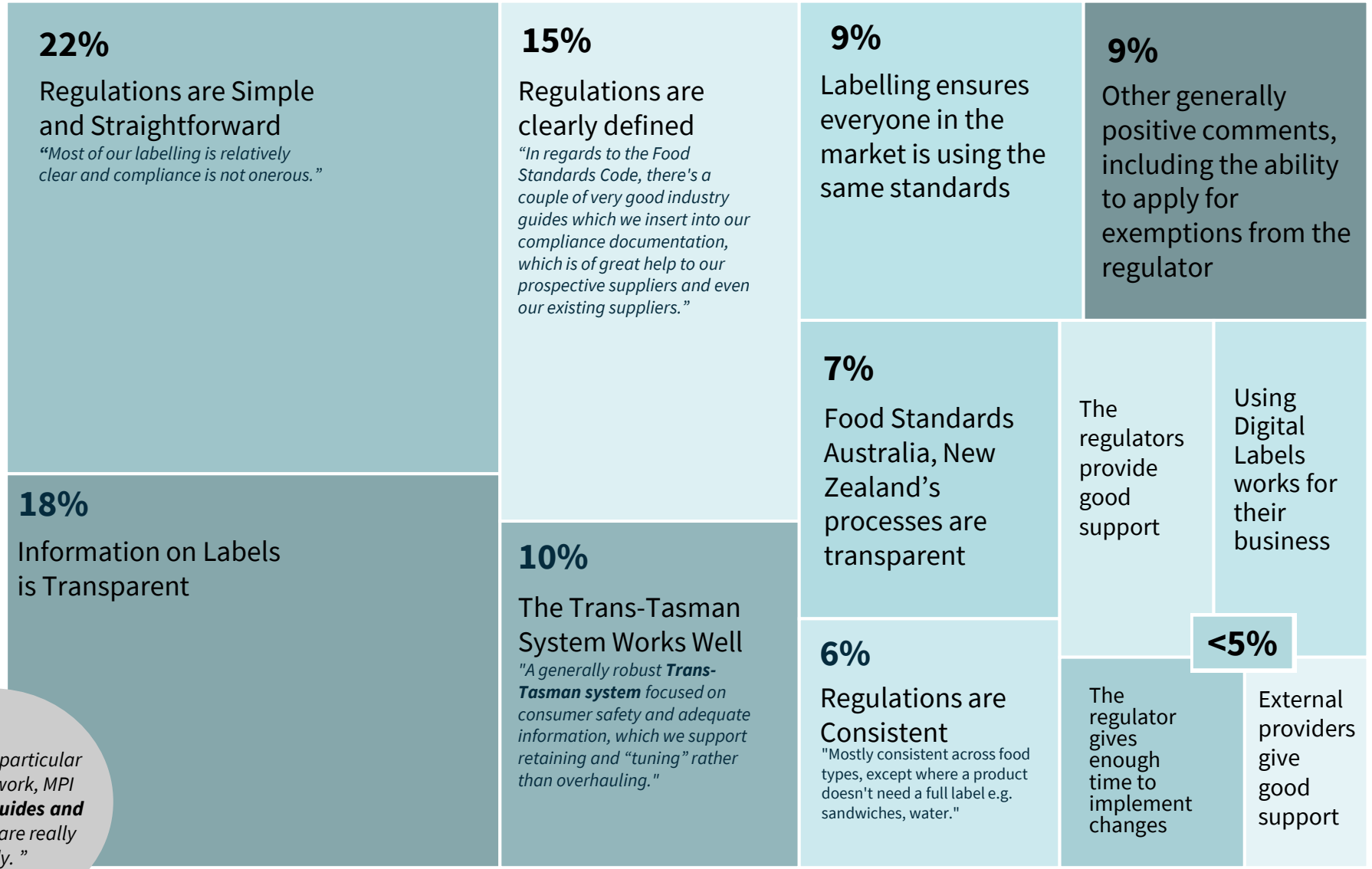
*International trade: June 2025 quarter | Stats NZ: https://www.stats.govt.nz/information-releases/international-trade-june-2025-quarter/

Part 3:

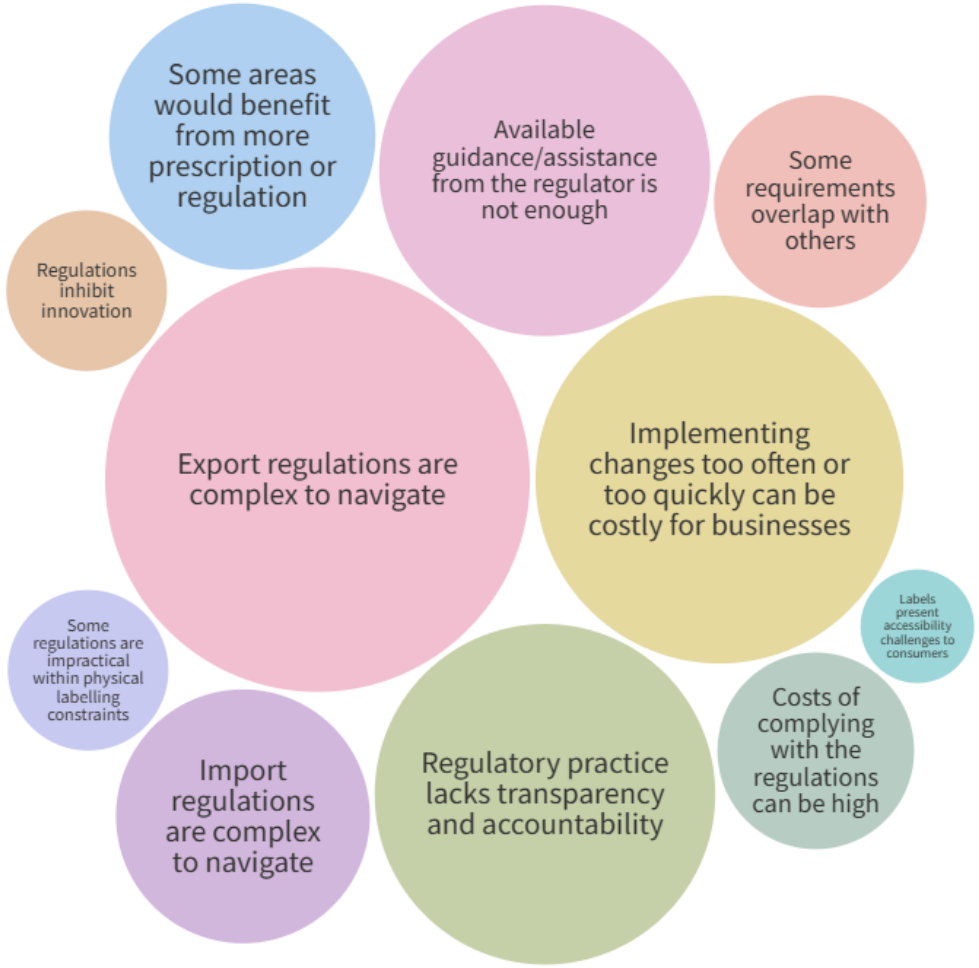
General themes

Examples of positive feedback about current labelling practices

There is no broad agreement on what works well within the same sector or industry, and no one group had a universal experience with their regulator.



Key regulatory challenges raised by stakeholders



The bigger the circle, the more submitters raised it.

We heard that New Zealand's market size creates challenges.

Differing regulations from other markets can mean that production runs specific to local requirements are not large enough to be viable.

Harmonisation with regulations in countries we import from or export to, can make this easier for local businesses, but presents different challenges and may not have the flexibility to take our unique needs into account.

Stakeholders told us that regulatory changes often mean products require new labels, which can be expensive, although they said it is possible to mitigate these costs by, for example, batching changes to implement and providing sufficient lead time to use existing stock before relabelling.

A primary concern of companies who deal with international markets was the variety of regulations from other countries with which they had to know.

Stakeholders discussed support they receive

The majority of stakeholders access support through:

- Their regulators
- Industry associations
- Private consultants

But it also comes from market representatives, standard-setting bodies, certification organisations, and local councils.

In some cases, where stakeholders felt they were insufficiently supported by the regulator or where the guidance was unclear, they hire private consultants to ensure they complied with regulations.

In other cases, stakeholders are supported by supplementary material from industry bodies who provide additional guidance or interpretive support.

"Where required, we have engaged with external consultants for advice, which incurs a cost. However, not all advice provided has been accurate or the most up-to-date requirements, adding to our frustration."

"FSANZ consultation processes are reasonably robust even if we do not agree with the outcome at times!"

"Our membership rely on the association - we produce a comprehensive labelling guideline. And that's something that's well received by the membership and we're here to help out. We're advising all the time about changes of interpretation [in relation to] labelling and packaging."

"MfE owns the ecolabel but currently provides no advice to consumers about how to identify genuinely environmentally preferable goods and services or avoid greenwashing."

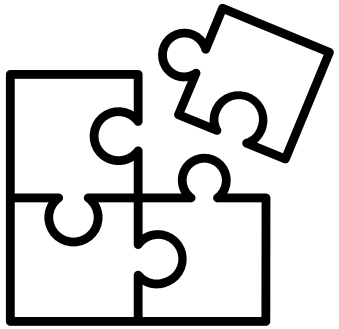
Positive themes about regulator support includes:

- Their responsiveness and willingness to engage
- Approachability and support of queries
- Website guidance the regulators provide is helpful

Some ways the regulator could improve includes:

- More consultation with industry on changes
- Better guidance (for example, on things like environmental labelling) to help reduce the need for private consultants
- Clarity on the best points of contact
- Greater cross-agency coordination to ensure consistent advice
- Better enforcement actions against non-compliances

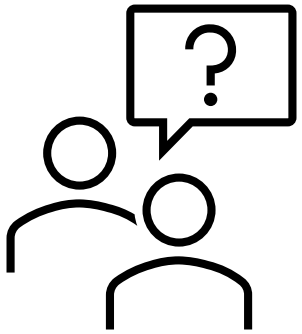
Barriers to entry, innovation, and expansion



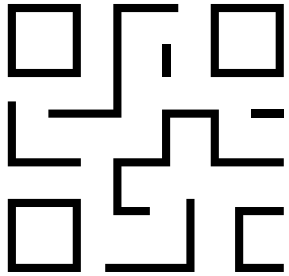
50% of submitters say aligning with international standards would help their business and have concerns if import/export standards were to change.

“Aligning New Zealand’s product labelling standards with those of our key export markets would directly benefit my business by reducing the risk of using a product that later blocks access to certain countries.”

"Unique NZ requirements would be challenging to comply with, as all medical devices supplied into NZ are imported. These medical devices comply with global harmonisation labelling requirements.”



Smaller businesses often have less capability to manage regulatory compliance and must hire in the knowledge – things like simpler rules and more import/export assistance from government agencies would help them expand more easily.



Stakeholders want to be enabled to use digital innovation, especially in the form of QR codes and 2D barcodes.

“In our view, digital labelling enables product information to be updated in real-time reducing business administrative burdens;

reduces the sole reliance on physical labelling encouraging business efficiency, industry productivity, sustainability and innovation;

supports export growth by enabling businesses to flexibly meet overseas regulatory requirements;

facilitates increased product information being available to consumers at any time enhancing consumer trust and transparency;

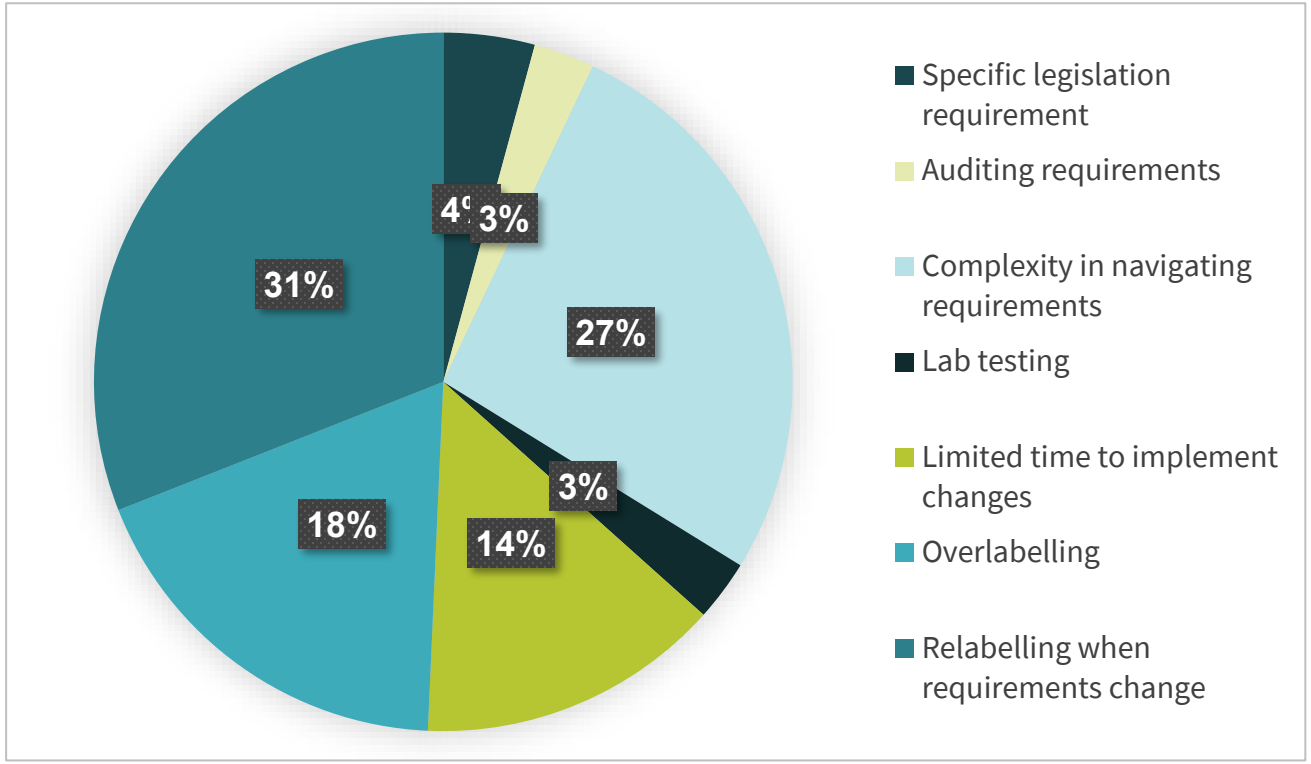
and enables the digital display of product information supporting consumer accessibility, such as for those with low vision.”

What submitters say adds to their compliance costs

Over 65% of all submitters consider labelling regulations impose unnecessary compliance costs for their business. Costs can be felt differently depending on the business

- 70% of small businesses said costs were unnecessary compared to 50% for large businesses
- Some respondents recognised the costs that compliance imposes, but believed they were necessary

Below are some of the reasons impacting costs:



Several sectors raised concerns that some imported products including online overseas purchases do not always comply with local regulation. As compliance is not effectively monitored and enforced, those who do not comply pay less to do business than those who do pay the costs associated with compliance. Stakeholders indicated that this creates an uneven playing field.

Transparency and Accessibility – ensuring suppliers and consumers get the information they need from product labels

Stakeholders report that product labelling provides crucial information to their customers and are interested in creating a level playing field with label claims to maintain trust – in some cases, through additional regulation or regulatory definitions.

Stakeholders want label claims to be transparent and consistent with regards to:

- Product durability/stability
- Health
- Environmental sustainability
- Nutrition contents (including allergens and sources, e.g. plant-based) on food labels
- Country of origin
- Definition of terms

Accessibility is important to stakeholders:

- Labels have finite space – technology like QR codes can help expand the amount of information available to consumers and make it easier to update.
- However, labels must consider those with additional needs, e.g. those with severe allergies, people who are vision-impaired or people with less access to technology.

Part 4:

Sector Specific Product Labelling Themes

Food and Beverages (alcoholic and non-alcoholic) products have specific labelling challenges

We heard that the content of the labels, the often very limited space, and some of what is mandatory present a challenge.

- Some elements (like allergen labelling) must remain on the physical product.
- Physical address requirements can be problematic for growing businesses that need to move to new premises.
- Customers want clear information about where products originate, their pricing and the nutritional value.
- Nutritional labelling is more rigorous in NZ and it can slow/limit imports.
- Stakeholders note a lack of enforcement against non-compliant businesses, creating an uneven playing field.
- It is sometimes unclear how the regulations should translate practically into a label.
- Label requirements on exported products are often different and challenging to meet.
- Markets do not always have the same definitions for some label terms, e.g. environmental, organics, vegan, halal.

Food Standards Australia and New Zealand's role was discussed at length.

FSANZ is responsible for developing and reviewing standards in the Australia New Zealand Food Standards Code. MPI is responsible for enforcing compliance with the Code. The Code is given legal effect in New Zealand by a mechanism set out in the Food Act 2014.

Stakeholders talked about their reviews, decision-making processes, and timeframes. They were positive about the way they consult with industry, including meetings, webinars, and formal submissions. Stakeholders also mentioned that their cost modelling and consultation papers provide useful insights.

They detailed concerns about how the Australia New Zealand Food Standards Code is implemented.

- Time and cost involved in implementing any changes can be significant, especially if they are too frequent.
- Requirements may be harmonised but the enforcement approach is not.
- Minor technical breaches that don't impact customer health and safety can take significant time and cost to fix.
- Complaint-based enforcement raises issues relating to competition. They also want more clarity when issues they raise won't be investigated.
- It is hard for some businesses to understand what is required due to complexity and/or the way it is communicated.

Positive feedback:

Some stakeholders didn't want any changes made to the systems.

The Trans-Tasman agreement allows for products to flow between Australia and New Zealand seamlessly.

Changes stakeholders asked for:

Stakeholders want the ability to include industry or private certifications on the label.

They want the regulator to take measures to help them minimise cost and waste, including faster export exemptions from domestic requirements and long lead times for changes.

Stakeholders mentioned international trends in food labelling including the use of QR codes, increased nutrition and ingredient labelling and environmental labelling.

"Food labelling primarily becomes a challenge when business wants to send one product to multiple countries. Food labelling regulations globally are diverse and increasing in complexity. It is important to recognise that this isn't always related to labelling, it can also reflect the market specific product standards that have knock on effects to labelling."

Chemicals and hazardous substance products have specific labelling challenges

Varying interpretations of Globally Harmonised System of Classification and Labelling of Chemicals (GHS) in different jurisdictions are problematic.

Although the system is meant to be harmonised, there are some local differences in interpretation or requirements that mean additional work must be done on a label before the product can be used locally. For example:

- an icon which is mandatory in New Zealand but not in Australia
- differing disposal rules within New Zealand to other jurisdictions

A lack of clarity on some aspects of safety data sheets (SDS) can result in inaccurate labelling on their products.

Stakeholders raised two issues around SDSs:

- The way chemicals are classified in New Zealand is different to other jurisdictions and that can affect the end label
- No rules about who can author an SDS means that you could potentially author your own, and as a result classify your own products

The volume of mandatory information does not leave much space for product information.

Similar to other products, there is a limit to what will fit on a label, which means labels must carefully balance the mandatory information with how they wish to market their products, or with comprehensive use instructions. It could have flow-on effects to how the products are used (or cause misuse).

There is complexity in navigating the requirements between several regulators in this space. The EPA, WorkSafe, and MBIE all have a role.

- WorkSafe labelling rules haven't been updated to reflect GHS, causing confusion
- The Hazardous Substances and New Organisms Act requires labels to follow GHS, but Health and Safety at Work Act can require extra label information that isn't part of GHS, leading to duplication and inconsistent labelling.

"[They] generally follow patterns established by other global authorities and key trading partners. Again, we would not like to see this regulatory policy process jeopardized by the product labelling review."

"…you could get something that comes from Asia that's labelled [for] the UK thinking it's labelled up as GHS7, but then it comes into New Zealand and we have to relabel it because we've got some tiny differences - probably the one that comes to mind is disposal."

"One [issue] is the SDS and how we classify chemicals over here, which seems to be quite out of whack with the good data you get from Europe. Which can be very frustrating because then that means you can get classification differences which then impact upon your labelling."

Dietary Supplements and Over-the-counter Medicines have specific labelling challenges

Dietary Supplements

Stakeholders raised that Dietary Supplement Regulations are outdated. Current regulations mean that supplements exported overseas must first meet domestic requirements to the therapeutic claims on the labels or obtain an exemption from these requirements.

If a supplement contains vitamins or minerals exceeding the recommended daily intake, it may trigger the supplement to be a medicine and fall under Medsafe. This could mean reformulation, manufacturing and redoing the labels in order to sell in New Zealand.

Stakeholders discussed the current export exemption work in this area and concerns the product labelling review may impact/stall this.

We heard that harmonising with other countries requirements may help. However, there were also concerns that harmonisation could be difficult because each country has unique requirements. For example:

- United States – active ingredients in proprietary blends don't need to be declared
- Australia – not permitted to declare non-active ingredients
- NZ– must declare non-active ingredients either by class or by name.

Over-the-counter (OTC) Medicines

Harmonisation was a key issue raised by stakeholders. We heard that, similar to dietary supplements, the OTC regulations create barriers to harmonisation with other countries, particularly Australia.

Feedback states that New Zealand is missing out on updated products, in some cases relying on those more than 30-40 years old, in part because labelling processes required to bring in newer products are too onerous for suppliers.

We heard that different regulatory classifications, labelling requirements, and the prohibition on therapeutic claims mean that businesses cannot sell an Australian-labelled product in New Zealand. The differences create a duplication burden, forcing businesses to develop and print two separate sets of labels, one for Australia and one for New Zealand. Stakeholders told us that even minor formulation changes, such as vitamin or mineral content adjustments or redesign, can trigger the need for new labels in the New Zealand market, causing delays and slow market expansion. This also impacts if a medicine can be sold over the counter or if it must be provided through a prescription.

"Harmonisation is not necessarily the answer and really what we've got to do is fix the export issue. First, export exemptions so that all dietary supplements can make the health benefit claims and meet all of the other labelling requirements for the importing countries."

"[Newer products] are not commercially viable because our market (…) is too small and at the end of a very long supply chain. (…) New Zealand consumers are missing out because the labelling requirements in combination with our market size mean that some products aren't commercially viable."

Other products have specific labelling challenges

Agricultural products and veterinary medicines (ACVM)

Stakeholders said the speed and frequency of changes to ACVM regulations can complicate labelling, especially for smaller businesses.

They said that agrichemical harmonisation with Australia specifically would produce some benefits, although they also recognise there may be good reasons for not doing so.

Stakeholders also shared that under the ACVM Act, if a product advertises or implies that it treats disease, then it must be registered as a veterinary medicine. This is a long and expensive process resulting in some suppliers choosing not to sell that product in New Zealand. New Zealand appears to be an outlier here.

Electronics

Although some stakeholders said that they deal in electronic products, feedback did not indicate any issues relating to labelling for this product type.

Organic Products

Organic products are largely found in the food and beverage markets, however they can be present elsewhere, like in textiles.

Stakeholders mentioned that organic standards are not the same in all markets. There are both private and regulated standards for certain products which can further confuse both supplier and customer.

Stakeholders mentioned that if the standard is too difficult to meet or too different internationally vs domestically, it can prevent growers or suppliers from entering a market.

"Many of our growers support the requirement for a robust organic standard as the market is currently crowded with up to five different private certification schemes. Our organic growers support one label backed by government regulation."

Clothes, Shoes, Fabric and Furnishings

Stakeholders shared that current requirements for labelling fibre content, country of origin, and product care are useful, and required internationally as well – although there is some misalignment of standards.

Stakeholders mentioned that some requirements feel disproportionate to the level of risk they are designed to address, such as the font size required for care symbols. Any mistakes can be costly to remedy.

They also said that standards aren't written in plain English which makes it difficult for non-technical specialists to understand.

Stakeholders shared that retailers selling clothes/furnishings in New Zealand have to provide accurate labels, but some overseas sellers don't comply – disadvantaging local businesses.

Other products have specific labelling challenges (cont)

Building Products

The feedback on labels for building products focused on the durability of the information on the labels and the accessibility of that information to those using the materials in construction. They highlighted the importance of label information in the traceability of materials in case they fail – without labels, it is impossible to address faulty products.

"It is not durable. Many cases where treatment labels are removed and there is no ability to trace back to where the timber was treated(…)"

Stakeholders discussed how some technological improvements could benefit labels on building products, but the audience for the information affects what format is most desirable.

For customers, a QR code which goes straight to the relevant information can be helpful, but builders may need to see all information on the physical label and are not incentivised to use their phones to ensure they have the right product when they are on the job site.

Cigarettes, Tobacco and Products that Contain Nicotine

We did not engage with any tobacco companies, however the survey was passed onto one organisation who responded.

Generally, stakeholder feedback indicated:

- Regulatory bodies provide conflicting advice
- Complexity in accommodating dual-language and market-specific claims
- Difficulty managing label variations for small productions being exported to multiple countries

Stakeholders also discussed how "active" ingredients are measured and labelled in vaping products.

"Current Ministry guidance permits two different strength metrics. Allowing both created inconsistent labelling which confuses customers and frustrates enforcement. It can also materially misstate the amount of active nicotine."

Cosmetics

Stakeholders only had minor comments on cosmetic products – some stakeholders did not agree on whether change was necessary and some suggested the potential for future changes.

"There is scope in the future to look at how to adopt digital labels but there could be added within existing regulation as/when needed to maintain international alignment."

They highlighted that the approach to sunscreens differs between Australia and New Zealand because it is considered a therapeutic product within New Zealand, and subject to more stringent efficacy requirements.

Part 5:

Cross-sector improvements suggested in engagement

Stakeholders suggested ways to reduce compliance costs

Ensure there is a **clear need for any changes** *"let's not fix what isn't broken"*

*"Adoption of an **e-labeling** regime would streamline implementation and significantly reduce costs while improving consumers' access to up-to-date information."*

Provide **extended implementation times** when regulations are updated. This would reduce waste and lower costs.

Eliminate unnecessary physical labels...and replace with relevant information managed electronically

*"Explicit **recognition of GS1 Digital Links, QR Codes** and other smart packaging technologies as valid carriers of regulatory information"*

Stakeholders discussed the benefits and hurdles to digital labelling

There are regulatory barriers to using digital labelling for mandatory requirements

Domestically

- Stakeholders shared that many businesses lack confidence because no product labelling regulations currently permit mandatory information to be provided electronically (for example, via a QR code or 2D barcode). However, the Australian and New Zealand Food and Grocery Councils recently launched Smart Facts* – a voluntary QR code pilot for interested businesses.
- Stakeholders mentioned that businesses are often required to maintain physical labels and can only supplement them with digital formats, resulting in a dual barrier. This increases costs and complexity.
- There remains some confusion in sectors such as medical devices about whether QR codes can legally be used alongside physical labels.
- Some stakeholders shared that it would be more beneficial to use QR codes on building products because of their flexibility.
- Accessibility is a concern in this area. Not everyone has or wants constant access to a smart phone and work is needed to ensure accessibility for the disabled community.

Internationally

- Some regulators are beginning to allow electronic provision of mandatory product labelling requirements.
- The EU and US are increasingly accepting QR codes as primary carriers of regulatory information.
- The EU is introducing digital product passports.
- New Zealand exporters may face challenges if we don't keep up with the technological advancements.

Some stakeholders suggested harmonising the approach to digital labels across countries or products.

Digital labels may not be appropriate for all products or for some requirements

We heard from stakeholders that for some products, information accessibility takes priority, such as allergen information.

*Introducing SmartFacts® to Aotearoa New Zealand market » GS1 New Zealand

Stakeholders shared possible benefits of digital labelling including

- More space for information on labels
- Easier to implement changes for different markets
- Reduced cost in printing
- Increased access to international markets

"Under the Food Standards Code mandatory information must be on a label and there's no provision for that to be via an electronic label. So there has been some uptake - people may use QR code for marketing information but they won't be bearing the mandatory regulatory information in New Zealand. I can't speak for other sectors, other frameworks, but certainly for us it's purely a regulatory barrier. And if that was lifted then I think there would be strong business uptake."

"I can't see a builder find the way to get his phone to scan a QR code to see if he's got the right bit the timber to go on the house. He wants to see the words and the letters, and what he is used to. I know it's change and we all have to come into the a changed world, but I think its better if its labelled and not something else."

Next steps

The diagram below sets out the next steps for the Product Labelling Review.