



Information for Food Sold Online: Understanding and Defining the Problem

A policy paper prepared by the Food Regulation
Standing Committee

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Contents

Executive summary	3
Purpose	5
Introduction	5
Trans-Tasman regulatory context	6
Australia New Zealand Food Standards Code labelling requirements	6
Policy guidelines related to labelling.....	7
Information major retailers are providing for food online.....	7
International regulatory context	8
Codex Alimentarius	8
Regulations in other select countries	9
Recommendations and next steps.....	10
References	12
Appendix 1: Stocktake of information provided for selected products sold online.....	14
New Zealand retailers	14
Australian retailers	16
Appendix 2: Specific Codex labelling provisions which should be provided for foods sold online	18

Executive summary

This trans-Tasman food regulation system policy paper explores the current situation for information provided for food sold online to help understand the issues and identify the potential problem.

The scope of this project is limited to food products required to bear a label in the Australia New Zealand Food Standards Code.

Increasingly consumers in Australia and New Zealand are shopping for food online. Recent estimates indicate that 11% of Australian consumers and 13% of New Zealand consumers mainly shop for their groceries online, with a higher proportion shopping online occasionally.

The Australia New Zealand Food Standards Code sets out the labelling and information requirements for a food that is required to bear a label for retail sale. It does not provide requirements for information to be provided when these foods are sold online. Therefore, consumers shopping online for food may not have access to information they need to make safe and informed choices.

Food Standards Australia New Zealand (FSANZ) heard in response to their 2025 call for information on nutrition labelling that academic, public health, consumer and government submitters recognised that consumers not having access to nutrition labelling information when shopping online was a concern and could hinder their ability to make informed choices.

Most of the major retailers in Australia (Woolworths and Coles) and New Zealand (New World, Woolworths and Pak'n'save) offer online food shopping. These major retailers currently provide most of the information required on a food label when selling food online. However, there are some inconsistencies, and consumers may not always have access to all the relevant information they would find on the physical label to inform their purchase decisions, such as storage instructions, Health Star Rating and supplier information. There are also many smaller retailers who sell food online.

In 2024, Codex Alimentarius adopted a new *Guideline on the Provision of Food Information for Pre-packaged Foods to be Offered via E-commerce* (CXG 104-2024). This outlines that most information required on the physical label of prepackaged food shall also be provided online. This information is required in the European Union and the United Kingdom.

Currently there are five policy guidelines or statements specific to food labelling on the trans-Tasman food regulation website. These all relate to specific labelling situations (such as menu board labelling) or labelling elements (such as nutrition labelling). None of these provide guidance on information that should be provided by those selling food online.

Based on this evidence the Food Regulation Standing Committee (FRSC) considers proposing the following problem statement for information for food sold online:

Consumers shopping for food online that is required to bear a label in Australia and New Zealand do not have consistent access to the same information as those shopping at a physical store. This is inconsistent with guidance from Codex Alimentarius and may limit the ability of consumers to make safe and informed choices when shopping for these foods online.

Information for Food Sold Online: Understanding and Defining the Problem

Consumers not having access to nutrition labelling information when shopping online was raised as a concern by submitters to FSANZ's 2025 call for information on nutrition labelling. There is no policy guideline in Australia or New Zealand on what information should be provided by sellers when food required to bear a label is sold online to inform FSANZ's consideration.

The FRSC recommend that work on information for food sold online is progressed through the Food Regulation Policy Framework. If the work is agreed to by Food Ministers, the next steps are to describe the desired outcome and consult with stakeholders on options to achieve this.

Purpose

The purpose of this paper is to understand the current situation around information provided for food sold online and identify any issues.

In 2024 the Food Ministers' Meeting (FMM) agreed to four new strategic outcomes for the trans-Tasman Food Regulation System from 2025-2028:

- Safe, suitable food
- Healthy food supply
- Informed, empowered consumers
- Thriving food economies

Information for food sold online was raised as a potential new work item for the Food Regulation Standing Committee (FRSC) that could contribute to strategic outcome 3 and 4.

The scope of this project is focused on information available to the consumer purchasing food online when they do not have access to the physical label to inform their purchasing decision. This is limited to food products required to bear a label in the Australia New Zealand Food Standards Code. Information accessed by consumers using technology via a reference on the food label (such as QR codes) is also out of scope.

Introduction

Increasingly consumers in Australia and New Zealand are shopping for food online. The COVID-19 pandemic drastically reshaped consumer behaviour including driving an increase in purchasing food online.

In 2024 the New Zealand Commerce Commission released their first annual grocery report (Commerce Commission New Zealand, 2024). This reported that in 2019 online sales accounted for 2.91% of total sales from regulated grocery retailers in New Zealand (comprised of the major supermarket chains), this increased to 6.76% in 2022 and in 2023 accounted for 6.15% of their total sales. In Australia, the Australian Bureau of Statistics reported that online food shopping in Australia rose from \$1,393 million in February 2020 to \$2,088 million in February 2021 and in February 2025 accounted for \$3,181 million (Australian Bureau of Statistics, 2025).

A 2024 online survey of 1000 New Zealand and 1000 Australian consumers conducted by the Interactive Advertising Bureau reported that 78% of New Zealand and 83% of Australian online shoppers are shopping online every month. Of these, 42% and 49% respectively are shopping for groceries (Interactive Advertising Bureau, 2024).

A 2023 online survey of 1602 New Zealand consumers found that 13% of these consumers reported that in the typical week their household gets food from online supermarkets and 30% reported their household purchased food from online supermarkets in the last 12 months (New Zealand Food Safety, 2024).

A 2022 online survey of 2500 Australian consumers found that 47.9% of these consumers reported shopping online for food at least some of the time, with 11.5% reporting mainly buying their groceries online (Appinio and Spryker, 2022).

With the growing number of consumers shopping for food online it is important that these consumers have the information they need to make safe and informed purchasing decisions, similar to the information they would find on the physical label of the food.

Food Standards Australia New Zealand (FSANZ) heard in response to their 2025 call for information on nutrition labelling that academic, public health, consumer and government submitters suggested both the nutrition information panel (NIP) and Health Star Rating (HSR) must be readily available when purchasing food, including online (FSANZ, 2025). Many recognised not having access to this information when shopping online was a concern and hindered consumers' ability to make informed food choices.

Trans-Tasman regulatory context

Australia New Zealand Food Standards Code labelling requirements

The Australia New Zealand Food Standards Code (Food Standards Australia New Zealand, 2025) outlines the labelling requirements for food for retail sale in Australia and New Zealand. This includes which foods are required to bear a label and the information required on this label. This does not include what information should be provided by sellers online when food required to bear a label is sold online.

Under the Food Standards Code, when a food for retail sale is required to bear a label, the following information must be provided legibly and in English as part of or attached to the package:

- A lot/batch identification
- Name that gives an accurate description of the food
- Name and physical address of the New Zealand or Australian supplier¹
- Ingredients list
- Nutrition information panel
- Information on characterising ingredients where applicable
- A date mark for foods with a shelf life of less than 2 years
- Any specific food storage instructions/directions for use if required to keep the food until its date mark
- Allergen declaration where applicable
- Warning and advisory statements where applicable
- Statement that the food has been irradiated or genetically modified if applicable.

The label can also include the following:

¹ The supplier can be the packer, manufacturer, vendor or importer of the food

- Health Star Rating
- Nutrition content claims and health claims (if certain conditions are met).

There are additional labelling requirements for certain foods such as alcohol and special purpose foods.

Foods are exempt from having such a label in certain situations (see Section 1.2.1-6 of the Food Standards Code). This includes when food is delivered packaged, ready for consumption, at the express order of the purchaser.

There are also some food labelling requirements outside of the Food Standards Code that will need to be considered as part of this work. Most food sold in Australia must be labelled with its country of origin, outlined under Australian Consumer Law (Australian Competition and Consumer Commission, n.d.). In New Zealand certain fresh, frozen and thawed food must disclose the country of origin under New Zealand consumer law (Commerce Commission New Zealand, 2024). In New Zealand the Weights and Measures Regulations 1999 also require retailers to provide the net contents of food products (Ministry of Business, Innovation and Employment, 1999).

Policy guidelines related to labelling

Currently there are five policy guidelines or statements specific to food labelling on the trans-Tasman Food Regulation website². None of these provide guidance on information that should be provided for food sold online. These all relate to specific labelling situations (such as menu board labelling) or labelling elements (such as nutrition labelling, claims, front-of-pack labelling, and food produced using new technologies).

The most relevant policy guideline is on food labelling to support consumers to make informed healthy choices. This focusses on nutrition labelling aspects and not general labelling. However, it outlines Ministers' expectations that food labels provide adequate information to enable consumers to make informed food choices to support healthy dietary patterns recommended in the Dietary Guidelines. This policy guideline focuses on the physical food label but also states that this guideline should be taken into account when considering regulations for off label information. It is also intended to be used in conjunction with other specific food labelling guidelines where relevant.

Information major retailers are providing for food online

All the major grocery retailers in Australia (Woolworths and Coles) and New Zealand (New World, Woolworths and Pak'n'save) offer online shopping, except for Aldi in Australia. Additionally, groceries can be purchased through third-party applications such as Milkrun, Uber Eats, and Doordash. There are also many smaller retailers who offer online food shopping.

² [Policy guideline on food labelling to support consumers to make informed healthy choices](#); [Policy guideline on menu labelling](#); [Policy guideline on nutrition, health and related claims](#) ; [Policy guideline on the labelling of food produced using new technologies](#). [Policy statement on front-of-pack labelling](#)

A small stocktake of commonly purchased household foods to identify the information provided for food sold online by the major grocery retailers in Australia and New Zealand can be found at Appendix 1. In this stocktake four grocery items were examined at each retailer (soft drink, frozen pizza, milk and bread), where possible the same product was examined at each retailer. Overall, most information required to be on the physical label was provided on the online page except for date marking information and lot identification (this is expected as these vary by individual product).

A product image was provided for all observed products, for some products this showed all sides of the package whilst for others this showed just the front of pack. The back of pack information on the images was not legible for some products, however often this information was also provided on the product page.

In New Zealand, the supplier address, storage instructions and Health Star Rating, when used on the product, were often not provided. There was one product where the nutrition information was not provided.

In Australia there were some products where the supplier address was not provided and one product where the storage instructions and Health Star Rating, when used on the product, were not provided.

This stocktake did not include smaller retailers or verify whether the information provided online matched that on the physical label. Many of the retailers provided a disclaimer that this information is subject to change and encourage consumers to also check the physical label.

There are also many smaller retailers selling food products online. These were not assessed as part of this stocktake.

International regulatory context

Codex Alimentarius

In 2024, Codex Alimentarius adopted a new *Guideline on the Provision of Food Information for Pre-packaged Foods to be Offered via E-commerce* (CXG 104-2024) (Codex Alimentarius, 2024), developed by the Codex Committee on Food Labelling. The purpose of this guideline is to ensure consumers buying pre-packaged foods online have the information needed to make informed choices, similar to the information they would find on the physical label of the food.

This short guideline outlines that information required on the physical label of prepackaged food shall also be provided on the online product information page prior to the point of sale. There is an exception for lot identification and date marking as these relate to an individual product and cannot be practically provided on a generic product information page. This information still needs to be provided on the physical label, along with all required label information, when the product is delivered to the consumer. There is an option to provide a voluntary statement to inform the consumer about the relationship between the date mark and the shipping date or point of delivery.

The guidelines require a statement on the product information e-page to the effect that the consumer should check the label information on the physical product before consuming. The

information provided on the product e-page should be legible, in a language suitable to the consumer and be accessible to the consumer without a charge.

The guidelines state that labelling exemptions for small units do not apply to these products when they are sold online. This is because the space limitations of a small package don't apply when information is provided online.

More information on the specific Codex labelling provisions on information which should be provided for foods sold online is provided at Appendix 2.

Regulations in other select countries

outlines regulations for information for food sold online in the European Union, the United Kingdom, Canada and the United States of America.

Table 1: Other countries regulations for information for food sold online

Country	Regulations related to information for food sold online
European Union (European Parliament, 2011)	Regulation (EU) No 1169/2011 mandates that all mandatory food information, except for information on date marking, be available before purchase when food is sold online. This shall either appear on the webpage or through other appropriate means without extra cost to the consumer.
United Kingdom (Department for Environment, Food & Rural Affairs and Food Standards Agency, 2015)	Those selling food products online must make the required information available, for free, to the customer before they buy (except the durability and freezing dates) and when it is delivered to them. If the food will be sold non pre-packed to the final consumer, all the information required for non pre-packed foods must be provided. If the food will be sold pre-packed to the final consumer, all information required for pre-packed food must be provided.
United States of America (Department of Health And Human Services Food and Drug Administration , 2023)	The US Food and Drug Administration (FDA) mandates certain food labelling information on packaging, however currently online grocery retailers aren't legally required to reproduce that information on their website when selling food online. In 2007 the FDA recommended in a "dear manufacturer" letter that the nutrition information presented online be similar to FDA's Nutrition Facts label requirements and that any claims made about food online should be consistent with FDA's current laws and regulations. In April 2023 the FDA issued a request for information to learn more about the content, format and accuracy of food labelling information provided through online grocery shopping platforms.

Country	Regulations related to information for food sold online
Canada (Government of Canada, 2023)	Canada's Food and Drug Regulations and the Safe Food for Canadians Regulations set out the mandatory information required on the physical label of most prepackaged foods and some non-packaged foods. The Safe Food for Canadians Act has broad prohibitions against false and misleading labelling that apply to food advertised or sold in Canada, including through e-commerce. There are no other requirements for what information should be provided for food sold online. In 2022 the Canadian government consulted on the development of voluntary guidance for providing information for foods sold to consumers through e-commerce.

Recommendations and next steps

There is currently no guidance or requirements in Australia or New Zealand on what information should be provided by sellers for food sold online. This could mean that the increasing number of consumers shopping for food online do not have access to the information available to them in a physical store to make safe and informed purchasing decisions.

There is an opportunity for the FRSC to provide guidance on what information should be provided by sellers for food sold online to ensure consumers can make safe and informed choices. This also provides an opportunity to ensure food regulations are fit for purpose into the future reflecting how consumers purchase their foods, set clear expectations for industry and seek alignment with international guidance from Codex Alimentarius.

Particularly as FSANZ has received feedback from stakeholders that not having access to nutrition labelling information when shopping online is a concern, provision of policy guidance on the information that should be provided by sellers for foods sold online is timely to inform FSANZ's consideration of this.

It is therefore recommended that work on information for food sold online is progressed through the Food Regulation Policy Framework. Based on the evidence summarised in this paper, the following problem statement is proposed by the Food Regulation Standing Committee for agreement by the Food Ministers Meeting to proceed through Gateway 1:

Consumers shopping for food online that is required to bear a label in Australia and New Zealand do not have consistent access to the same information as those shopping at a physical store. This is inconsistent with guidance from Codex Alimentarius and may limit the ability of consumers to make safe and informed choices when shopping for these foods online.

Consumers not having access to nutrition labelling information when shopping online was raised as a concern by submitters to FSANZ's 2025 call for information on nutrition labelling. There is no policy guideline in Australia or New Zealand on what information should be provided by sellers when food required to bear a label is sold online to inform FSANZ's consideration.

Information for Food Sold Online: Understanding and Defining the Problem

If it is agreed to progress this work through the Food Regulatory Framework, the next steps are to describe the desired outcome and develop options to achieve this. These will be outlined in a consultation paper seeking stakeholder views.

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Information for Food Sold Online: Understanding and Defining the Problem

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Appendix 1: Stocktake of information provided for selected products sold online

New Zealand retailers

	Image	Name	Supplier address	Net contents	Ingredients list	NIP	Storage instructions	Where applicable			
								Characterising ingredient	Warning or advisory statements	HSR	Claims
Woolworths New Zealand											
Soft drink	☑	☑	☒	☑	☑	☑	☒	N/A	☑	☑	N/A
Frozen pizza	☑	☑	☑ From image	☑	☑	☑	☑ from image	☑	☑	☑	N/A
Milk	☑	☑	☒ Not readable on image	☑	☑	☑	☒ Not readable on image	N/A	☑	☑	☑
Bread	☑ FOP only	☑	☒	☑	☑	☒	☒	N/A	☑	☑	☑
Pak n Save New Zealand											

Information for Food Sold Online: Understanding and Defining the Problem

	Image	Name	Supplier address	Net contents	Ingredients list	NIP	Storage instructions	Where applicable			
								Characterising ingredient	Warning or advisory statements	HSR	Claims
Soft drink	✓	✓	✗	✓	✓ From image	✓ From image	✗	N/A	✓ From image	✗	N/A
Frozen pizza	✓	✓	✓ From image	✓	✓	✓	✓ From image	✓	✓	✓ From image	N/A
Milk	✓ FOP only	✓	✗	✓	✓	✓	✗	N/A	✓	✓ From image	✓
Bread	✓ FOP only	✓	✗	✓	✓	✓	✗	N/A	✓	✗	✓
New World New Zealand											
Soft drink	✓	✓	✗	✓	✓ From image	✓ From image	✗	N/A	✓ From image	✗	N/A
Frozen pizza	✓	✓	✓ From image	✓	✓ From image	✓	✗	✓ From image	✓ From image	✓ From image	N/A

Information for Food Sold Online: Understanding and Defining the Problem

	Image	Name	Supplier address	Net contents	Ingredients list	NIP	Storage instructions	Where applicable			
								Characterising ingredient	Warning or advisory statements	HSR	Claims
Milk	☑ FOP only	☑	☒	☑	☑	☑	☒	N/A	☑	☑ From image	☑
Bread	☑ FOP only	☑	☒	☑	☑	☑	☒	N/A	☑	☒	☑

Australian retailers

	Image	Name	Supplier address	Net contents	Ingredients list	NIP	Storage instructions	Where applicable			
								Characterising ingredient	Warning or advisory statements	HSR	Claims
Woolworths Australia											
Soft drink	☑	☑	☒	☑	☑	☑	☒	N/A	☑	☑	N/A
Frozen pizza	☑	☑	☑ From image	☑	☑	☑	☑	☑	☑	☑	N/A

Information for Food Sold Online: Understanding and Defining the Problem

Milk	☒ FOP only	☒	☒ From image	☒	☒	☒	☒	N/A	☒	☒	N/A
Bread	☒	☒	☒ From image	☒	☒	☒	☒	N/A	☒	☒	☒
Coles Australia											
Soft drink	☒	☒	☒	☒	☒	☒	☒	N/A	☒	☒	N/A
Frozen pizza	☒	☒	☒ From image	☒	☒	☒	☒	☒	☒	☒ From image	N/A
Milk	☒	☒	☒ From image	☒	☒	☒	☒	N/A	☒	☒ From image	☒
Bread	☒	☒	☒ From image	☒	☒	☒	☒	N/A	☒	☒ From image	☒

Note:

- At each retailer one product was examined for each product category.
- the date marking information and lot identification was not provided for any product observed in Australia or New Zealand

Appendix 2: Specific Codex labelling provisions which should be provided for foods sold online

Text from the Guidelines on the Provision of Food Information for Pre-packaged Foods to be Offered via E-commerce (Codex Alimentarius, 2024)	Specific codex labelling aspects referenced
The general principles in Section 3 of the General standard for the labelling of pre-packaged foods are applicable to food information shown on the product information e-page of the pre-packaged food that is being offered for sale.	• 3.1 Pre-packaged food shall not be described or presented on any label or in any labelling in a manner that is false, misleading or deceptive or is likely to create an erroneous impression regarding its character in any respect. • 3.2 Pre-packaged food shall not be described or presented on any label or in any labelling by words, pictorial or other devices which refer to or are suggestive either directly or indirectly, of any other product with which such food might be confused, or in such a manner as to lead the purchaser or consumer to suppose that the food is connected with such other product.
The food information required to be provided on the label of a pre-packaged food or in associated labelling, shall be provided on the product information e-page of the pre-packaged food prior to the point of e-commerce sale, except to the extent otherwise expressly provided in these guidelines, or any other Codex text. This includes the following food information indicated in: • Section 4 and Section 5 of the General standard for the labelling of pre-packaged foods except information required by 4.6 and 4.7.1.	Following labelling sections apply: • Name of the food (4.1) • List of ingredients, including allergy declarations (4.2) • Net contents and drained weight (4.3) • Name and address (4.4) • Country of origin (4.5) • Storage instructions (4.7.2) • Quantitative ingredients declaration (5.1) • Irradiated food labelling (5.2) Following labelling sections do not apply: • Lot identification (4.6) • Date mark (4.7.1)

Text from the Guidelines on the Provision of Food Information for Pre-packaged Foods to be Offered via E-commerce (Codex Alimentarius, 2024)	Specific codex labelling aspects referenced
Section 3 of the Guidelines on nutrition labelling (CXG 2-1985)	Following labelling sections apply: Nutrient declaration (section 3).
Any other relevant Codex text	For example: General guidelines on Claims (CXG 1-1979), Guidelines for use of nutrition and health claims (CXG 23-1997), General Guidelines for Use of the Term “Halal” (CXG 24-1997) and commodity texts which include specific labelling requirements.