

PRINCIPAL FOOD LABELLING REQUIREMENTS

1. The table below specifies the main food labelling requirements, together with the most commonly used voluntary information provided by manufacturers and retailers.

Mandatory	Voluntary
Name	Vegetarian/vegan labelling
List of ingredients	Assurance scheme
Quantity of certain ingredients (QUID) e.g. "Chicken (10%)"	Nutrition information (if no claims are made)
Net quantity (Weights and measures)	May contain ("may contain traces of nut)
Date of minimum durability ('best before' or 'use by' date)	Special offer competitions e.g. Marketing offers 3 for 2 etc.
The name and address of the manufacturer/packer/seller	Method of Slaughter (Halal and shechita slaughter)
Place of origin (if failure to do so might mislead)	Animal Welfare (free range etc)
Instructions for use (if failure to do so might mislead)	Nutrition Signposting
Allergen information (in the ingredient list)	Brand information
Alcoholic strength by volume (drinks over 1.2% only)	Marketing Claims such as "No artificial additives" (similar claims)
Quinine labelling	Environmental impact e.g. dolphin friendly.
High caffeine content warning (drinks containing over 150 mg/l of caffeine)	Production methods (organic etc)
Sweetener labelling ("with [sugar(s) and] sweeteners")	Guideline Daily Amounts
Polyol warning ("excessive consumption may produce laxative effects)	Country of origin (where not required)
PKU warning ("contains a source of phenylalanine")	Logos (red tractor)
Packaging gases ("packaged in a protective atmosphere")	Customary or descriptive names
Raw milk labelling	Marketing Terms – Fresh, pure, natural
GMO labelling	Quality type claims e.g. "100% chicken breast"
Irradiated food labelling ("irradiated" or "treated with ionising radiation")	Pictures and graphics, including flags and icons
Nutritional Panel (where a nutritional claim is made)	Number of servings

Labelling of Loose Foods and Foods pre-packed for Direct Sale, including Catering Establishments

2. Article 14 of Directive 2000/13 allows Member States to adopt their own rules as to how and what information should be provided for food sold loose and pre-packed for direct sale, so long as the consumer still receives sufficient information. In the UK, foods sold in this manner need only provide information on whether the food contains any irradiated ingredients or ingredients derived from GM sources. This applies to foods sold pre-packed for direct sale or not pre-

packed at retail level, with the addition of the name of the food and an indication of certain additives. This provision is particularly important for small businesses because it allows them flexibility, and the UK, in its comments on the review, favoured its retention.

FOOD LABELLING ACTION PLAN: UPDATE ON SUMMARY OF RECOMMENDATIONS

Changes in Legislation

- 1 Press for amendments to EU legislation to remove all ingredient listing exemptions for **major allergens**, delete the “**25% rule**” and extend ingredient listing rules to **alcoholic drinks**.
 - An amendment (EEC/2003/89) to the Food Labelling Directive came into force on 25 November 2004 requiring pre-packed foods (including alcoholic drinks) to specify the inclusion of twelve specified allergens. This amendment also removed the ‘25%’ rule, with the result that almost all ingredients now have to be labelled.
 - The UK Government, in its response to the Commission of 5 July 2006, supported in principle ingredient listing for all alcoholic drinks, but recognised that there were difficulties in the detailed application which would need to be fully worked through, to ensure that requirements were kept simple and proportionate.
- 2 Strongly support the European Commission proposal to require the labelling of **GM animal feed** to complement existing GM labelling rules, and press the European Commission to introduce clear rules for “**GM free**” labelling.
 - EC legislation requiring the labelling of GM animal feed came into force in April 2004.
- 3 Press for EU rules requiring **nutrition labelling** on all foods.
 - The European Commission is currently reviewing nutrition labelling legislation (Council Directive 91/496/EEC: a proposal is expected in 2007).
- 4 Press for early adoption of statutory EU criteria for **nutrition claims**, based on our current advice.
- 5 Press for EU legislation which allows **disease risk reduction claims**.
- 6 Press for an effective and practical system of verification and approval of **health claims** at EU level.
 - (Recommendations 4,5 and 6) It is expected that a proposal for an EU Regulation on Nutrition and Health Claims made on Food will be adopted later this year. Amongst other things, the proposed Regulation will establish a positive list of permitted nutrition claims. The Regulation also lays down procedures for the authorisation, following assessment by the European Food safety Authority

(EFSA), of health claims including claims referring to a reduction in the risk of disease.

7. Press for EU rules requiring **origin labelling** on a wider range of foods and for clear rules on use of terms like "produce of".
 - The UK Government, in its response to the Commission of 5 July 2006, indicated that it was in principle in favour of an extension of country of origin requirements, subject to an assessment of costs and benefits in an Impact Assessment.
 - The Food Standards Agency issued Guidance on Country of Origin Labelling in 2002. This Guidance is currently being revised, following a survey of uptake and meetings with key stakeholders.

Voluntary Initiatives

8. Set up a task force with consumer and industry representatives to find and implement ways of **improving label clarity**; commission consumer research on **nutrition labelling** (ideally in collaboration with consumer groups and industry) to define the ideal content and format.
 - The Food Standards Agency issued Guidance on Clear Labelling in 2002. This Guidance is currently being revised, following a survey of uptake and meetings with key stakeholders. The Agency has also commissioned qualitative consumer research to help determine what information consumers want and need on a label, which is due to be published shortly.
 - Research on the best format for back of pack labelling was completed in 2003. Since then the Agency has completed extensive research into appropriate formats for front of pack labelling. The Board noted the consumer research on the front of pack signpost labelling scheme and recommended that businesses adopted voluntary signposting schemes based on the Agency's core principles on 9 March 2006.
9. Work with consumers, enforcement authorities and industry to develop and implement a **Code of Practice on promotion of foods to children**.
 - The Board agreed an Action Plan on Food Promotion to Children in (date). On (date) it responded to Ofcom's consultation on controls on advertising to children. The Department of Health now has policy lead on this issue and is taking forward action outlined in the White Paper "Choosing Health".
10. Encourage industry to adopt clear, transparent criteria for use of potentially misleading terms like **"fresh"**, **"traditional"** etc.

- The Food Standards Agency issued Guidance on the use of marketing terms in 2002: 'Criteria for the Use of the Terms Fresh, Pure, Natural etc. in Food Labelling'. The Agency commissioned consumer research on marketing terms which was published in January 2006. The Agency will consider whether there is a need to revise the current Guidance later this year.
 - The Food Standards Agency also issued 'Best Practice' Guidance on Use of the Terms 'Vegetarian' and 'Vegan' in Food Labelling' in April 2006. This was in response to consumer confusion on the use of these terms and has been supported by the UK's Vegetarian and Vegan Societies and industry.
11. Work with industry and public interest groups to reduce the use of "**may contain nut traces**" warnings and provide clear advice to consumers on the reasons behind the use of these warnings and what they mean.
- The Agency has issued Guidance on the use of "may contain" and is currently looking at dissemination of this information to stakeholders.
12. Work with consumers, enforcement authorities and industry to develop and implement a **Code of Practice on voluntary labelling**.
- The Agency is commissioning a survey later this year to examine the extent to which Assurance Schemes take into account the Agency's earlier advice on promoting 'Best Practice' on the provision of information for consumers.
 - The Agency is developing a Code of Practice, based on consumer concerns on the use of health charity and professional medical association logos on food labels.
13. Explore with consumers, enforcement authorities and industry how to improve **information provision in catering outlets**, and for **loose foods**, paying particular attention to the needs of those with food allergies; retain the UK's national requirement for **catering establishments** to convey information on the **presence of GM or irradiated ingredients**.
- As there is no statutory requirement for labelling of allergenic ingredients for foods sold non-prepacked, effective dialogue between the consumer and the vendor is essential in these situations for the consumer to be able to make fully informed food choices. The Agency has been consulting with stakeholders about how to assist these businesses in providing accurate information to allergic consumers. A stakeholder drafting group was set up which has produced draft voluntary guidance which is currently out for public consultation (3 month consultation ends 27th September 2006). The draft guidance will be reviewed in the light of the responses that are received, with the aim of publishing the final guidance document in Spring 2007.

- EC legislation, requiring the declaration of GM ingredients in food provided by catering establishments, came into force in April 2004.
14. Encourage industry to develop initiatives that provide additional **product information off label**; encourage industry to provide more information on **production systems**, particularly welfare standards, post-harvest use of pesticides and wax coatings on fruit and vegetables and use of growth hormones.
- Consumer demand for labelling has been considered as part of a limited range of wider studies to determine consumer information needs in relation to pesticides. Whilst there does seem to be an interest in labelling from the more discerning consumers, there appears to be no prospect at EU level to introduce harmonised rules on the labelling of post harvest pesticides. Agency research will continue to explore wider consumer information needs on pesticides.

Advice and education

15. Develop **resource material for use in schools** explaining how information on foods can be found on labels and elsewhere, and work with Department of Education and Employment (DfEE)¹ and other interested parties on ways to promote effective use of this material in schools.
- The Agency has worked with UK Education Departments and other stakeholders since its inception, to encourage the adoption of a 'whole school' approach to food and nutrition.
16. **Develop and disseminate clear advice on use of labels.**
- An interactive 'flash label' has been developed with other information for consumers on labelling on the Eatwell website.

Other initiatives

17. **Assess the potential impact of food e-tailing on the level of consumer protection.**
- Agency advice for consumers purchasing food via 'distance sales' has been on the Agency's Website since 2003.
18. **Assess the extent to which GM labelling is being enforced once the results of the surveillance exercise are available.**
- Local authorities regularly sample food and check traceability records to ensure GM labelling requirements are being met. The Agency also carries out ad hoc surveys. No significant problems have been reported to date.

¹ Now Department of Education and Skills (DfES)