

LABELLING OF 'ADDED INGREDIENTS' IN MEAT PRODUCTS COVERED BY MPR REGULATION 5

A GUIDE TO REGULATORY COMPLIANCE INCORPORATING GUIDANCE ON BEST PRACTICE

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1 Introduction

- 1.1 This guidance has been prepared by the Food Standards Agency (FSA) with the assistance of a Drafting Group comprising a consumer organisation, LACORS and industry¹.
- 1.2 This guidance applies to prominent labelling of added ingredients in meat products which have the appearance of a cut, joint, slice, portion or carcase of meat or of cured meat (in each case whether cooked or uncooked). In this guidance such meat products are referred to as appearing like "whole meats". The aim is to protect consumers and facilitate fair competition and consumer choice by encouraging

¹ Booker, British Hospitality & Restaurant Association (BHA), British Meat Processors Association (BMPA), British Pig Executive (BPEX), British Poultry Council (BPC), British Retail Consortium (BRC), Bodycote Law Labs, DEFRA, Food and Drink Federation (FDF), Food Standards Agency (FSA), Local Authority Co-ordinators of Regulatory Services (LACORS), Meat and Livestock Commission (MLC), National Federation of Meat & Food Traders (NFMFT), Provision Trade Federation (PTF), Which?

adoption of consistent, transparent labelling practices. It also provides guidance and 'best practice' advice on labelling of 'added ingredients' in meat products used in cooked recipe dishes in catering establishments. The guidance is aimed at manufacturers, retailers, wholesalers, catering establishments, enforcement authorities and importers.

- 1.3 The provisions of the Food Labelling Regulations 1996, as amended, and the 2003 Meat Products Regulations are explained in respect of statutory 'added ingredient' labelling of meat products. 'Best practice' advice is also offered on how labelling of added ingredients in meat products could help consumers to make more informed choices and avoid the potential for them to be misled. A clear distinction is made between legal requirements and advice on best practice, **with best practice advice highlighted by shaded boxes**. While the legal requirements must be met, following 'best practice' advice is not mandatory. Existing guidance has been drawn on, in particular the Agency's 'Clear Food Labelling' guidance.
- 1.4 The purpose of the legislation is to ensure that the name of the food reflects its true nature and content, so that consumers are accurately informed about the food and not deceived. The type of added ingredients may be an important factor in determining consumer choice. For example, a meat product containing ingredients from a different species to the rest of the meat, e.g. hydrolysed beef or pork proteins in a chicken product.
- 1.5 In addition, the prominent labelling of added water and other ingredients will help avoid confusion about products with a similar appearance in the marketplace. For instance, consumers will be able to distinguish between meat and meat products that otherwise look like meat (e.g. "pork chop" versus "pork chop with added water").
- 1.6 Industry (including importers) and enforcement officers are encouraged to use this guidance when making decisions on the declaration of added ingredients in meat products. Imported products will be subject to legislative requirements in the same way as domestically produced products but if there is any doubt on this point, industry should seek further advice from the relevant Local Food Authority.
- 1.7 The guidance in this document should not be taken as an authoritative statement or definitive interpretation of the law, as only the Courts have this power. Following guidance outlined here may assist companies to establish a defence of due diligence in ensuring their meat product labelling is correct. Ultimately, only the Courts can decide whether, in particular circumstances, an offence has been committed, or such a defence is available. However, the Courts and other regulatory enforcement bodies will be able to take this guidance into account when considering any possible breach of the rules.

- 1.8 The issue of prominent labelling of ‘added ingredients’ in meat products has been highlighted as a result of surveys by the FSA and enforcement authorities. These surveys found mislabelling problems of added water and the undeclared presence of pork and beef hydrolysed proteins. Most of the problems were in relation to imported chicken products destined for the catering sector. Obscure labelling of water retaining agents (such as salt) has also been associated with raw pork cut products. This guidance has been produced with a view to addressing the issues highlighted. Further background is outlined at Annex 1.
- 1.9 This document has also been produced to clarify the legal requirements concerning labelling of added starch and/or protein in regulation 5 meat products following changes to European legislation and amendment of the Meat Products Regulations in this respect (see paras. 5.14-5.21).

2 Relevant Legislation

Summary

- 2.1 The labelling of meat and poultry products with added water and other ingredients is controlled by the Food Labelling Regulations 1996, as amended (FLR), and the 2003 Meat Products Regulations (MPR). Regulation 8 of FLR requires food to be labelled with a name which indicates its true nature and which enables it to be distinguished from products with which it could be confused. The MPR require that for a product that resembles a cut, joint, slice, portion or carcase of meat or of cured meat, added water (where it makes up above 5% for cooked and uncooked meat, and cooked cured meat; and above 10% for uncooked cured meat) must be mentioned in the name of the food as well as any other ingredient of a different animal species to the meat. In addition, the meat content has to be declared either in the ingredients list or in/next to the name of the food, which indirectly indicates the amount of added water.
- 2.2 This guidance relates to, and should be read in conjunction with, the legal provisions specified below. To note, the England Regulations are referred to but the equivalent Regulations in Scotland, Wales and Northern Ireland are also relevant as this guidance applies on a UK-wide basis.

- **Trade Descriptions Act 1968²**

this makes it an offence for a trader to:

- apply a false trade description to any goods;
- supply or offer to supply any goods to which a false or misleading trade description is applied.

- **Food Safety Act 1990 (FSA 1990)**

this makes it an offence to sell a food for human consumption which:

- to the purchaser's prejudice is not of the nature, substance or quality demanded (section 14);
- in a label or advertisement is falsely described or misleading as to the nature, substance or quality of the food (section 15);
- is misleadingly presented (section 15).

- **Food Labelling Regulations 1996 (as amended) (FLR 1996)**

these particularly require:

- where there is no name prescribed by law and a customary name is not used, that the name used for the food shall be sufficiently precise to inform a purchaser of the true nature of the food and to enable the food to be distinguished from products with which it could be confused;
- the name of the food to include or be accompanied by an indication of the physical condition or treatment to which the food has been subjected where a purchaser could be misled by the omission of this information;
- a list of ingredients.

The rules require specific information to be given (see section 4). They also require this information to be easily visible, clearly legible and indelible (see para. 5.5). They do not set a minimum print size for this information (but see section 7 & Annex 4 on best practice).

QUID Rules

² Most of the TDA 1968 will be repealed by the regulations implementing the Unfair Commercial Practices Directive 2005/29/EC. The Regulations implementing the Directive in the UK are due to come into force on 26 May 2008.

Quantitative ingredient declarations (also known as QUID) are required by Regulation 19 of the FLR. QUID of ingredients must generally be made when the following criteria apply :

- the ingredient or category of ingredients is included in the name of the food or is usually associated with that name by the consumer;
- an ingredient/category of ingredient is given emphasis on the label in words, pictures or graphics; or
- the ingredient or category of ingredients is essential to characterise a food and to distinguish it from products with which it might be confused because of its name or appearance.
- Further detailed advice on QUID rules is given in the Agency's Guidance Notes on QUID.

Allergen Labelling

- The FLR is also amended by the Food Labelling (Amendment) (No.2) Regulations 2004 (SI 2004/2824), which implements Directive 2003/89/EC (which is an amendment to Directive 2000/13/EC). This came into force in England on 26 November 2004. These allergen labelling rules established a list of allergens that have to be indicated on the label whenever they or their derivatives are used as deliberate ingredients in pre-packed food, including alcoholic drinks, (Annex IIIa of Directive 2000/13/EC or Schedule AA1 of the Food Labelling Regulations 1996 (as amended)).
- The Food Labelling (Amendment) (England) (No. 2) Regulations 2005 implemented Commission Directive 2005/26/EC, that established a list of food ingredients or substances provisionally excluded from Annex IIIa of Directive 2000/13/EC of the European Parliament and of the Council. These Regulations expired on 25 November 2007.
- The Food Labelling (Amendment) (England) (No.2) (Amendment) Regulations 2005 implement Directive 2005/63/EC, which amended the list of ingredients provisionally exempt from the allergen labelling rules to include fish gelatine used as a carrier for vitamin or carotenoid preparations and flavours, also expired on 25 November 2007.
- The FLR were further amended by the Food Labelling (Declaration of Allergens) (England) Regulations 2007 which implement Commission Directive 2006/142/EC, of 22 December 2006, amending Annex IIIa of Directive 2000/13/EC of the European Parliament and of the Council listing the ingredients which must under all circumstances appear on the labelling of foodstuffs. The 2007 Regulations came into force on 23 December 2007, from which date products complying with the new rules may be sold. Manufacturers will have a further 12 months to make the necessary label changes. It will not be permitted as from 23 December 2008 to produce

products with labels that do not comply with these provisions. However, products that were labelled before this date may be sold while stocks last.

- The Food Labelling (Declaration of Allergens) Regulations 2008 will set out a list of permanent exemptions from the allergen labelling rules in the case of ingredients derived from specified allergens in Schedule AA1 of the Food Labelling Regulations 1996 (as amended) that are no longer allergenic. This legislation confirms the exemption status of many of the ingredients set out in the Food Labelling (Amendment) (England) (No.2) (Amendment) Regulations 2005.

Further detail on these new rules can be found in accompanying guidance to these Regulations. In addition, the reader is advised to consult the Agency's 'The Provision of Allergen Information for Non Pre-packed Foods' (<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/nonprepacked/>).

Meat Labelling

- The FLR implement Commission Directive 2001/101/EC as amended by Commission Directive 2002/86/EC relating to the EC definition of "meat". This is done in regulation 14 (4), and part I of Schedule 3. The definition applies exclusively to labelling of products which contain meat as an ingredient, i.e. it does NOT apply to the labelling of meat cuts and anatomical parts which are sold without further processing;
- It is necessary to provide a QUID declaration for meat ingredients in the product in accordance with the FLR but NOT necessary to declare the quantity of added water in the name of food or in the list of ingredients.

- **Meat Products (England) Regulations 2003 (MPR)**

Regulation 5 of MPR:

- contains 'name of food' provisions requiring that where certain meat products contain added water and/or other added ingredients, other than those listed in Schedule 3 (see Annex 2), these ingredients **must be declared in the name of the food**;
- applies to a **meat product with appearance of cut, joint, slice, portion or carcase of meat or cured meat, whether cooked or uncooked**, but NOT to reserved description meat products (i.e. those specified in Schedule 2 to the Regulations) or a meat product with the appearance of minced raw meat which has been shaped;
- prescribes that added animal ingredients must be declared in the name of the food regardless of their function if the meat product does not contain

meat of the species of animal from which the added ingredients are derived, e.g. 'chicken breast containing beef protein';

- if salt is being added other than as seasoning, it must be indicated in the name of the food (whilst the Food Labelling Regulations 1996 also require any added salt to be given in the ingredients list in descending order of weight); the same rule applies to other added ingredients such as herbs or spices if being added other than as seasoning, etc. (see Annex 2);
- applies to both UK-produced and imported meat products.

- **EC Poultrymeat Marketing Regulations - 1906/90/EEC & 1538/91/EEC (as amended)³**

- these Regulations establish limits for extraneous water allowed in fresh and frozen poultrymeat which range from 2% to 7% depending on the circumstances. These limits are intended to allow for the absorption of water during the normal hygienic preparation of poultrymeat (i.e. normal processes of plucking, spray washing and cooling);
- further detailed advice on these Regulations is given in DEFRA's draft "Enforcement Guide to EC Poultrymeat Marketing Standards Regulations";
- extraneous water absorbed by poultrymeat during its hygienic preparation is exempted from ingredient list declaration by Regulation 16(2) of the FLR.

- **EC Regulation 178/2002, the Food Safety Act 1990 (Amendment) Regulations 2004 & the General Food Regulations 2004**

- The principal aim of this Regulation is to protect public health and consumers' interests in relation to food.
- The Food Safety Act 1990 (Amendment) Regulations 2004 and the General Food Regulations 2004 align domestic legislation with the general principles and requirements of Regulation 178/2002, and introduce new enforcement provisions.
- Article 16 of Regulation 178/2002 on 'presentation' requires that the labelling, advertising, and presentation of food shall not mislead consumers. It applies in addition to the Trade Descriptions Act 1968 and Sections 14 and 15 of the Food Safety Act 1990, which continue in place.

³ The Poultrymeat Marketing Regulations will be replaced by Council Regulation 1234/2007 from July 2008. This new regulation covers a number of agricultural products. Detailed implementing rules are expected to follow. These are likely to include extraneous water limits.

- Further detailed advice on these Regulations is given in the Agency's 'EC General Food Law Regulation 178/2002: Food Safety Act 1990 (Amendment) Regulations 2004 and General Food Law Regulations 2004 Guidance'.

3. Scope – What Products are Covered?

- 3.1 This guidance applies to meat products covered by Regulation 5 of the MPR 2003. That is, any meat product whether raw or cooked, or cured with the appearance of a meat cut, joint, slice, portion or carcass (i.e. appearing like “whole meats”) and includes the following :
- white meats, e.g. rabbit products; poultry products: chicken, turkey, goose and duck products, in the form of breast fillets, joints, thighs, drumsticks, stir-fry strips;
 - red meats, e.g. pork products, lamb products, beef products in the form of chops, steaks (e.g. fillet, sirloin), joints, loin joint, medallions, loin steaks, shoulder joint, leg joints, rib-roast, stir-fry strips;
 - ham, bacon;
 - other cured meats, e.g. pastrami, salt beef, etc.;
 - game meat products, e.g. venison, pheasant, wild duck in the form of joints, etc.
- 3.2 In deciding if a meat product falls within the scope of Regulation 5, consideration should be given to whether the product has the appearance of “whole meat”. In determining this, no account should be taken of the presence in or on the “whole meat” of any seasoning, garnishing or gelatinous substance, nor of any packaging material enclosing the meat product.
- 3.3 Products outside the scope of this document are those which are obviously not “whole meat” products such as: sausages, burgers, meat pies, breaded products (e.g. nuggets), barbecued meat (i.e. uncooked meats and pre-cooked meats), hot and spicy wings where it is obvious from product appearance that ingredients have been added. Similarly, composite dishes containing meat (e.g. meat in gravy) fall outside the scope as they necessarily require water and other ingredients for their production. That said, the guidance does cover cases where meat products are used in composite dishes in catering establishments (see para. 5.28).
- 3.4 Some canned meat products are also outside the scope, e.g. comminuted meat products such as corned beef, luncheon meat, etc. However, canned meats with the appearance of “whole meat” (i.e. cut, joint, slice, etc.) such as canned hams do fall within the scope.

4. What Labelling is Required?

4.1 The principal provisions of the FLR (see also section 2 above) are to require all food which is ready for delivery to the ultimate consumer or to a catering establishment, subject to certain exceptions, to be marked or labelled with:

- the name of the food (r.5);
- a list of ingredients (r.5);
- the quantity of certain ingredients or categories of ingredients (QUID)(r.5);
- the appropriate durability indication (r.5);
- any special storage conditions or conditions of use (r.5);
- the name and address of the manufacturer or packer, or of a seller within the EC (r.5);
- an indication as necessary if the food or ingredients have been irradiated (r. 14(2), r. 25, Schedule 2); and,
- an indication as necessary of any additive(s) used (r.14) unless exempted by r.17 of FLR.

- and in certain cases:

- particulars of the place of origin of the food (r.5);
- instructions for use (r.5);
- presence of any allergens (r.34B).

- Other legislation to be aware of is the requirement to give an indication if the food or ingredients are genetically modified (Article 4 of Council Regulation 1830/2003 and r. 5 of the Genetically Modified Food (England) Regulations 2004).

4.2 The exceptions relate to foods which are not pre-packed (i.e. loose) or which are pre-packed for direct sale. These are exempt from full food labelling requirements. However, labelling rules require the name, an indication as necessary if these foods or ingredients have been irradiated, derived from GM, or contain certain categories of additives. Where these non pre-packed foods are sold in catering establishments only an indication is needed as necessary if these foods or ingredients have been irradiated, derived from GM or contain certain categories of additives (r.23, r.24, r.25 and r.27 of FLR and Article 4 of Council Regulation 1830/2003).

Added water and other added ingredients labelling

- 4.3 Regulation 16 of the FLR requires that added water used as an ingredient must generally be shown in the list of ingredients when it exceeds 5% of the finished product. An exception to this applies to water used solely for the reconstitution or partial reconstitution of an ingredient (in concentrated or dehydrated form), or where water is used as, or as part of, a medium which is not normally consumed.
- 4.4 Regulation 5 of the MPR requires added water⁴ and/or other added ingredients to be declared in the name of the food of meat products with the appearance of a cut, joint, slice, portion or carcase of meat or of cured meat (whether cooked or uncooked). The added ingredients that must be named include added animal ingredients from different meat species, but excludes those ingredients listed at Schedule 3 of the MPR (see Annex 2 and section 2 above). For example, chicken breast fillet products which contain added water and pork proteins must be named, “chicken breast fillets with added water and pork protein”. Whilst a QUID declaration for the meat ingredient is necessary, the quantity of added water in the name of the food or in the ingredients list is not required.
- 4.5 QUID rules require that the quantity must appear either in or next to the name of the food, or in the list of ingredients in connection with the ingredient or category of ingredients in question.

Recommended best practice

- 4.6 Some manufacturers already voluntarily give a quantitative declaration of the added water prominently in, or near, the name of the food for their meat products. As best practice, industry may wish to include a quantitative declaration of any added water in, or next to the name of the food of “whole meat” products (e.g. chicken breast with 10% added water). Also, including a quantitative declaration of the meat content in, or next to, the name of the food of “whole meat” products would be clearer than putting it in the ingredients list.

5 Product Name and Manner of Labelling or Marking of Added Ingredients

- 5.1 Under the FLR (Regulations 6-11) the legal name of the food must be:

⁴ In the case of meat (whether cooked or uncooked) or cooked cured meat, this is allowed to contain up to 5% added water, whilst uncooked cured meats are allowed to contain up to 10% added water without requiring a mention of the added water in the name of the food.

(i) if there is a name prescribed by law, that name;

or where there is no name prescribed by law,

(ii) a customary name⁵ - that is a name which, in time, comes to be accepted by consumers in the UK, or in particular areas of the UK, as the name of the food without it needing further explanation; or,

(iii) a name indicating the true nature of the food. That is, if there is no name prescribed by law and no customary name (or the customary name is not used) a legal name is one that is sufficiently precise to inform the consumer of the true nature of the food and to enable it to be distinguished from products with which it could be confused.

5.2 It should be noted that if a legal or customary name is used, it could still be qualified further by an explanatory description about the true nature of the food, if the end result is that the consumer is accurately informed.

5.3 There are currently no specific names prescribed by law (i.e. required to be used) for meat products. However, there are rules that require certain ingredients to be declared in the name of the food of certain meat products. These include 'added water' and ingredients from different animal species to that of the meat product (see para. 4.4).

5.4 There are some common customary names such as 'ham', 'bacon', 'pastrami'. However, most other meat products which look like a fresh meat cut (raw or cooked) will fall into the category requiring the legal name indicating the true nature of the food. These meat products are often given a fancy name (e.g. "marinated pork chops", "butter basted chicken portions", etc.) alongside the name of the food (e.g. "pork with added water, glucose syrup and salt", "butter basted chicken breasts with added water", etc.). Ham is understood to be a customary name when applied to a product which has been cooked and/or cured only, with up to 5% added water and not those with other added ingredients. Therefore, a customary name that is further qualified to indicate presence of added ingredients (including greater than 5% added water) would not be considered a customary name, e.g. "ham with added water".

5.5 Regulation 38 of the Food Labelling Regulations 1996 requires the legal name of the food (on a label, menu, notice or ticket) to be "clearly legible.....and marked in a conspicuous place in such a way as to be

⁵ Trade or fancy names will not comply with these requirements and similarly a customary name cannot suddenly come into existence. A description does not necessarily become a customary name after a set time of usage. A "fancy name" is a name serving a marketing function but which does not itself capture precisely the true nature of the food and enable the food to be distinguished from products with which it could be confused.

easily visible. Such particulars shall not in any way be hidden, obscured or interrupted by any other written or pictorial matter".

- 5.6 Some companies have interpreted this provision by adopting an approach which does not necessarily ensure that the name of the food is prominent information on the pack.

Some examples include:

- the actual name of the food being associated only with the list of ingredients, often in the same size type print;
- the name on the back or bottom of the pack in a position of relative obscurity.

Other examples which have been noted include:

- the name being incorporated within a marketing phrase promoting other virtues of the product so that the significance of the name can be lost.

- 5.7 In such cases, the fancy name for the product is given far greater prominence than the legal name of the food and care must be taken to ensure that legal requirements are met and the consumer is not misled.

- 5.8 In 2002, the Agency published its 'Clear Food Labelling' Guidance, based on the recommendations of an independent task force (see Annex 4). The guidance gives best practice advice on:

- grouping key facts together, so they are easier to find;
- using a minimum type size and high colour contrast, to make these key facts easier to read;
- using plain English, to make the information easier to understand;
- print size and clarity.

- 5.9 It should be borne in mind that consumers are likely to choose these products on the basis of appearance. There is therefore potential for consumers to be misled by the visual appearance and presentation of what may appear to be simply a cut, joint, slice, portion or carcase of raw, cooked or cured meat. Presentation of information on added ingredients is therefore particularly important.

Recommended best practice

- 5.10 We recommend that general advice on 'Clear Food Labelling' should be followed for labelling of the products covered in this guidance. Industry will want to take appropriate steps to minimise the possibility that consumers could be misled. For instance, the legal name of the food should be given sufficient prominence to ensure that it is clear to the consumer. To achieve this, the "name of the food" should ideally be used as the primary means of consumer communication. Where a

fancy name is used this should not be significantly more prominent than the name of the food and, in any event, should not mislead.

5.11 Industry may wish to include, as far as is reasonable, in the legal name of the food all added ingredients (see exemptions listed at Annex 2).

5.12 Industry should take into consideration that each and every reference to the name of the product could be potentially misleading. For example, it may be misleading to describe or refer to a pork chop with added water and salt, simply as a “Pork Chop”, even if the legal name appears elsewhere on the label. When considering offences of misleading labelling, the courts will look at the overall effect of the labelling of the product. Retailers should note that similar considerations apply to shelf talkers.

Recommended best practice

5.13 Where a product has undergone further processing / treatment not expected by the consumer, industry may wish to include an indication of the treatment in the fancy name (e.g. “Marinated Pork Chop”). The name of the food would then detail the type of processing / treatment undergone.

Labelling of starch and proteins

5.14 Changes to European hygiene legislation⁶ have removed certain specific requirements covering the declaration of added starch and protein in the name of the food for certain meat products. These labelling requirements had been based on whether or not the starch or protein had been added for a ‘technological purpose’; if they had not they were required to be mentioned in the name of the food.

5.15 Consequent on these European changes, the Meat Products (England) Regulations 2003 (MPR 2003) (and its equivalents in devolved administrations) have been amended to bring them into line with the European legislation. This effectively means that starch and protein are no longer subject to the requirements of regulation 5(2)(b) of the MPR 2003 though they remain subject to the requirements of the Food Labelling Regulations 1996. There is, however, an important exception to this for proteins of animal origin where the animal is of a different species to the meat (see para. 5.21).

5.16 Regulation 5(2)(b) of the MPR 2003 (and its equivalents in the devolved administrations) requires added ingredients in certain meat products to be declared in the name of the food. There are, however, exemptions from this requirement as set out in Schedule 3 to those

⁶ Directive 77/99/EEC has been repealed by Directive 2004/41/EC as part of the consolidation of European hygiene legislation.

Regulations, including, hitherto, one for starch and protein added for a “technological purpose”. Previously, therefore, regulation 5(2)(b) covered added starch and protein, unless they had been added for such a purpose. In line with the new EU rules, however, regulation 5(2)(b) no longer applies to added starch and protein and hence the related reference to starch and protein added for technological purposes has been removed from Schedule 3 of the MPR 2003⁷. In short, neither added starch nor added protein is subject to the requirements of regulation 5(2)(b), whether or not added for a technological purpose.

- 5.17 The disapplication to starch and protein of the requirements of regulation 5(2)(b) of the MPR 2003 does not mean that they are unregulated. The FSA 1990 and the general food labelling rules of the FLR (as amended) will continue to apply to all meat products, including those with added starch and/or proteins. Requirements include those related to the name of the food. In the absence of any name prescribed by law for the food, or a customary name which is used, any added starch or protein would need to be declared in the name of the food of the meat product if not to do so would mislead the consumer about the true nature of the food or would not enable the food to be distinguished from products with which it could be confused (see regulation 8 of the FLR).
- 5.18 It is difficult to be specific about when added starch and protein would be required to be in the name of the food in order for regulation 8 of the FLR to be complied with. Ultimately this is for the courts to decide. The Food Standards Agency, however, is of the view that if the starch or protein is used to bulk out the meat product or act as a meat replacer, that might result in regulation 8 being engaged and the starch or protein having to be declared in the name of the food. For other situations where the starch or protein is not being used to bulk out the food, key considerations will include issues such as the amount of starch or protein added, whether consumers would normally expect such ingredients, the range of similar products on the market and whether they too have added starch or protein. In the light of these and possibly other considerations industry will need to consider whether or not including starch or protein in the name of the food could mislead consumers or mean that the food cannot be distinguished from products that it could be confused with.
- 5.19 In summary, declaration of added starch and/or protein in the relevant products has previously been regulated by both regulation 5 of the MPR 2003 and regulation 8 of the FLR, together with general provisions of the FSA 1990. The FLR and FSA 1990 will continue to

⁷ The Meat Products (England) (Amendment) Regulations 2008 (SI 2008 No.517), ISBN: 978-0-11-081084-3 and parallel legislation in Scotland, Wales, and Northern Ireland, i.e. SSI 2008 No.97, ISBN: 978-0-11-081560-2; SI 2008 No.713 (W.74), ISBN: 978-0-11-091769-6; SI 2008 NO.82, ISBN: 978-0-33-797282-9 respectively.

apply, but the MPR 2003 will not. Industry will need to decide if, under general labelling rules, not to declare added starch and/or protein in meat products would mislead the consumer about the true nature of the product on a case-by-case basis.

Recommended best practice

5.20 Industry will want to take appropriate steps to minimise the possibility that consumers could be misled. If, on balance, industry believes that added starch or protein does not have to be included in the name of the food, but there remains any doubt, we recommend that full information about these added ingredients be given prominently in the name of the food for consumer information (see also paras.5.10 – 5.11 and 5.25).

5.21 It is emphasised that the separate requirement in regulation 5(2)(a) of the MPR 2003 to declare in the name of the food ingredients of animal origin if they come from a different species to the meat will continue. Therefore, where, for example, pork or beef proteins are used in poultry products the requirement to declare them in the name of the food will continue.

Bacon, ham and other cured meat products

5.22 Water is needed to distribute the curing salts into the meat in the curing process to make bacon, ham and other cured meat products (e.g. salt beef, pastrami, etc.). Therefore, a certain amount of added water is inevitable in most cured meat products. Cooked cured meat (e.g. ham) is allowed to contain up to 5% added water, whilst uncooked cured meats (e.g. bacon) are allowed to contain up to 10% added water without requiring a mention of the added water in the name of the food. Where ham and bacon contain more than 5% and 10% respectively, the name of the food must include a statement, “with added water”. An allowance of 10% added water for bacon is permitted as 10% is accepted as the cut-off minimum amount of water that is needed to distribute curing salts efficiently in the pork in a wet cure process, which is the main method of bacon manufacture. In any case, added water (over 5%) must also be declared in the ingredients list, under the general rules of the FLR. Also, the pork content will be quantified in the ingredients list or in or next to the name of the food under QUID rules. Alternatively, if the business chooses to declare the meat ingredient as the specific cut in the ingredients list or name of cured meat products, then the quantity of the ‘cut’ must be indicated not the quantity of ‘pork’.

Recommended best practice

5.23 Whilst the above reflects the legal position, manufacturers may also wish to follow the best practice outlined in paragraphs 5.10, 5.11 and 5.13 above. In addition, given consumer concerns that added water may be present in cured meat products industry may wish to include a quantitative indication of the water content in, or next to, the name of the food for these particular products or include a quantitative declaration of the meat content in, or next to, the name of the food (see also best practice advice at para. 4.6 above).

Meat products (which have the appearance of “whole meats”) sold loose or pre-packed for direct sale over the counter and deli counters

5.24 Most foods sold loose or pre-packed for direct sale over the counter are exempt from full food labelling requirements other than requiring the name of the food (and, an indication as necessary if the food or ingredients have been irradiated, derived from GM or contain certain categories of additives). However, under the FLR (r. 23(2)(c)), loose meat products must give a declaration of the meat content. Furthermore, the name of certain meat products must be accompanied by any added ingredient information required by Regulation 5 of the MPR as stated at section 2, paras. 4.4, 5.16 and 5.21 (e.g. “ham with added water and milk proteins”).

Recommended best practice

5.25 Industry may wish to consider, as far as is reasonable, the legal name of the food should include all added ingredients, whether or not these are legally required (see exemptions listed at Annex 2).

5.26 The legally required information relating to product name, meat content, category of additives, and ‘added ingredient’ information for certain meat products must be displayed on, for example, display tickets, etc., in a conspicuous place that is readily discernible by an intending purchaser at the place where he chooses that food (e.g. “chicken breast fillets, 90% chicken with added water and pork proteins”).

Recommended best practice

5.27 Industry may wish to consider having further ‘added ingredient’ information available to sales staff to pass on to consumers if they request it (e.g. on back of label).

Meat products (which have the appearance of “whole meats”) sold not pre-packed or sold pre-packed for direct sale by catering establishments

- 5.28 Full labelling information is not legally required for foods sold by catering establishments where the food is not pre-packed or is pre-packed for direct sale, including meals cooked on the premises (see sections 2 and 4). Caterers will be supplied with relevant 'added ingredient' information from producers. Therefore, descriptions provided by caterers on menus, chalkboards, etc., are required to describe the product accurately as purchased by the consumer and not be misleading. Thus, for meals cooked on premises, either as eaten or taken away, information provided to consumers should accurately reflect, and be relevant to, the food being bought rather than relating to the raw ingredient component(s) and should reflect the provisions of this guidance as it relates to regulatory compliance.
- 5.29 Where caterers choose to give a specific name to foods sold in a catering establishment (e.g. on a menu), the FSA 1990 and labelling rules require that the name must indicate the true nature of the food and distinguish it from products with which it could be confused. For "whole meat"-like products, this would also include labelling in the name of the food any added proteins from a different meat species and should be clearly shown on the menu or sales ticket for the final consumer. This is irrespective of whether the meat product is used without further cooking (e.g. sliced ham) or cooked in a recipe dish (e.g. meat in gravy). Cooking will not affect the presence of added proteins or other meat derived ingredients in the meat product.
- 5.30 More generally, in respect of meat products, the catering establishment should consider whether the product is of the nature, substance or quality expected by the consumer. For bought in cold, cooked meat products, the legal name of the product, indicating the true nature of the food should be given (see paragraphs 5.10 – 5.13).

Recommended best practice

- 5.31 There are a number of different ways in which information about the nature of any meat products used can be given. These can include the menu descriptions such as on chalkboards, wall notices; pre-printed take-away menus etc. Information that is displayed prominently in or near the product name, in text that is easily seen by consumers at the point of selection will be of most help to consumers. In circumstances where additional information is needed, information should be supplied to staff on any added ingredients in meat products used, so that this information can be easily and clearly conveyed to consumers if requested.

6. Use of Qualifying Descriptors

- 6.1 There are many common terms and descriptors used on meat products which look like a fresh meat cut to describe specific characteristics

and/or treatments applied, such as “basted”, “self-basting”, “marinated”, etc.

- 6.2 Care should be taken when the name of such meat products use qualifying descriptors such as “basted” that this is done accurately.

Recommended best practice

- 6.3 Industry will want to ensure that these terms are used accurately and consistently, in line with Annex 3 to describe how the product was prepared and as commonly understood by consumers to be usual practice. In some cases, it may be more accurate to describe the product as “pre-basted” or “self-basting”, etc. The glossary (Annex 3) outlines some definitions of these terms as commonly understood.

7. Print Size and Clarity

- 7.1 Further detailed advice on print size and clarity is given in the Agency’s best practice guidance on ‘Clear Food Labelling’ and the relevant extract is reproduced at Annex 4.

8. References

Legislation

- Directive 2000/13/EC of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs. OJ No. L109, 6.5.2000, p.29.
- Directive 2001/101/EC of 26 November 2001 amending Directive 2000/13/EC of the European Parliament and of the Council on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs.
- Council Regulation (EEC) No.1906/90 of 26 June 1990 on certain marketing standards for poultry. OJ No. L173, 6.7.90, p.1-4. (to note, this will be replaced by Council Regulation 1234/2007 – see footnote in text.)
- Commission Regulation (EEC) 1538/91 of 5 June 1991 introducing detailed rules for implementing Regulation 1906/90 on certain marketing standards for poultrymeat. OJ No. L143, 7.6.1991, pp.1-36. (to note, this will be replaced by Council Regulation 1234/2007 – see footnote in text.)
- Food Safety Act 1990, London: HMSO, ISBN: 0-10-541690-8.

- Trade Descriptions Act 1968, ISBN: 0-10-542968-6.
- The Food Labelling Regulations 1996 (SI 1499), as amended, ISBN: 0-11-035941-0.
- The Food Labelling (Amendment) (No.2) Regulations 1999 (SI 1483), ISBN: 0-11-082694-9.
- The Food Labelling (Amendment) (England) Regulations 2003 (SI 2003/474), ISBN: 0-11-045185-6.
- The Food Labelling (Amendment) (Scotland) Regulations 2003 (SSI 2003 No.578), ISBN: 0-11-062551-X.
- The Food Labelling (Amendment) (Wales) Regulations 2003 (WSI 2003 No.832 W.104), ISBN: 0-11090698-5.
- Food Labelling (Amendment) Regulations (Northern Ireland) 2003 (SI 2003 No.159), ISBN: 0-33795004-0.
- The Food Labelling (Amendment) (England) (No.2) Regulations 2004 (SI 2004/2824), ISBN: 0-11-050030-X.
- The Food Labelling (Amendment) (Scotland) (No.2) Regulations 2004 (SSI 2004/0472), ISBN: 0-11-069308-6.
- The Food Labelling (Amendment) (No.2) (Wales) Regulations 2004 (SI 2004 No.3022), ISBN: 0-11091038-9.
- The Food Labelling (Amendment No.2) Regulations (Northern Ireland) 2004 (SI 2004 No.469), ISBN: 0-33795734-7.
- Food Labelling (Declaration of Allergens) (England) Regulations 2007 (SI 2007 No.3256), ISBN: 978-0-11-080102-5.
- Food Labelling (Declaration of Allergens) (Scotland) Regulations 2007 (SSI 2007 No. 534), ISBN: 978-0-11-080165-0.
- Food Labelling (Declaration of Allergens) (Wales) Regulations 2007 (SI 2007 No.3379 (W.301)), ISBN: 978-0-11-0916972.
- Food Labelling (Declaration of Allergens) (Northern Ireland) Regulations 2007 (SR No. 498), ISBN: 978-0-337-97215-7.
- Council Regulation 1830/2003 of 22 September 2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC. OJ No. L268, 18.10.2003, p.24-28.
- The Genetically Modified Food (England) Regulations 2004 (SI 2004/2335), ISBN: 0-11-049799-6.

- The Genetically Modified Food (Scotland) Regulations 2004 (SSI 2004/432), ISBN: 0-11069281-0.
- The Genetically Modified Food (Wales) Regulations 2004 (SI 2004 No.3220), ISBN: 0-11-091045-1.
- The Genetically Modified Food Regulations (Northern Ireland) 2004 (SI 2004 No.385), ISBN: 0-33795666-9.
- The Meat Products (England) Regulations 2003 (SI 2003 No.2075), ISBN: 0-11-047359-0.
- The Meat Products (Scotland) Regulations 2004 (SI 2004 No.6), ISBN: 0-11-062587-0.
- The Meat Products (Wales) Regulations 2004 (SI 2004 No.1396), ISBN: 0-11-090948-8.
- The Meat Products (Northern Ireland) Regulations 2004 (SI 2004 No.13), ISBN: 0-337-95361-9.
- The Meat Products (England) (Amendment) Regulations 2008 (SI 2008 No.517), ISBN: 978-0-11-081084-3.
- The Meat Products (Scotland) Amendment Regulations 2008 (SSI 2008 No.97), ISBN: 978-0-11-081560-2.
- The Meat Products (Wales) (Amendment) Regulations 2008 (SI 2008 No.713 (W.74)), ISBN: 978-0-11-091769-6.
- The Meat Products (Amendment) Regulations (Northern Ireland) 2008 (SI 2008 No.82), ISBN: 978-0-33-797282-9.
- General Food Law Regulation 178/2002/EC. OJ No. L31, 1.2.2002, p.1-24.
- The Food Safety Act 1990 (Amendment) Regulations 2004 (SI 2990), ISBN: 0-11-050223-X.
- The Food Safety (NI) Order 1991 (Amendment) Regulations (Northern Ireland) 2004, No.482.
- General Food Regulations 2004 (SI 3279), ISBN: 0-11-051007-0.
- The General Food Regulations (Northern Ireland) 2004, No.505.
- Directive 2004/41/EC repealing certain directives concerning food hygiene and health conditions for the production and placing on the market of certain products of animal origin intended for human consumption and amending Council Directives 89/662/EEC and 92/118/EEC and Council Decision 95/408/EC. OJ No. L195, 2.6.2004, pp.12-15.

All available at: www.opsi.gov.uk/legislation/index.htm:

www.europa.eu.int/eur-lex/.

Agency Guidance Notes

- FSA Guidance Notes on FLR 1996 (January 1997)

<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/foodlabrelregsguid>

- FSA Guidance Notes on 'QUID' (June 1999)

<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/quidguid>

- FSA Guidance Notes on MPR 2003 (Sept. 2003)

www.food.gov.uk/foodindustry/guidancenotes/meatregsguid/meatproductsguidancelabel

- FSA Guidance Notes on the Food Labelling (Amendment) (No.2) – Regulations 2004 (November 2004)

<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/foodlabguidance>

- FSA Guidance Notes on the Food Safety Act 1990 (Amendment) Regulations 2004 and the General Food Regulations 2004 (December 2004, Re-issued in March 2005)

<http://www.food.gov.uk/foodindustry/guidancenotes/foodguid/generalfoodsafetyguide>

- Agency Advice for Caterers on Allergy and Intolerance (May 2004)

<http://www.food.gov.uk/healthiereating/allergyintol/caterers/>

- Clear Food Labelling Guidance (October 2002)

<http://www.food.gov.uk/foodindustry/guidancenotes/labelregsguidance/clearfoodlabelling>

9. Contact Points for Further Information

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Background & 'Added Ingredient' Information

1. Background

- 1.1 If water is added as an ingredient to fresh meat (including poultry), it cannot be sold as fresh meat but becomes a "meat product" which has to be labelled to indicate that water and/or other added ingredients have been added. There are no limits laid down for added water and other ingredients. Such meat products must be properly labelled so that the consumer is not misled (see section 2 of this document). Therefore, products such as pork cuts or chicken breast fillets with added water and other ingredients can be marketed legally, provided all the necessary information is given to the consumer.
- 1.2 The issue of prominent 'added ingredient' labelling of meat products has come to the fore following surveys carried out by the FSA, Irish authorities and Local Authorities⁸. These highlighted mislabelling problems of added water and undeclared addition of pork and beef hydrolysed proteins mostly in imported chicken breast products destined for the catering sector, as well as obscure labelling of water retaining agents (such as salt) in raw pork cut products.
- 1.3 There have been consumer concerns about the lack of full descriptions of product names on meat products. In particular, that use of beef and pork hydrolysed proteins may result in inadvertent consumption of beef or pork by consumers who avoid these ingredients for religious, ethical or other reasons.
- 1.4 These surveys, combined with public concerns about the results and continuing evidence of mislabelling, have resulted in the FSA lobbying the EC to strengthen labelling requirements for these products but the EC concluded that current legislation is adequate. This guidance on prominent labelling of added ingredients has been produced with a view to addressing the concerns raised. The guidance specifically focuses on those meat products which could be most confusing to consumers, namely products that otherwise look like cuts, joints, slices, etc., of fresh meat.

⁸ Food Standards Agency, Survey of Added Water in Chickens and Chicken Parts, Food Surveillance Information Sheet (FSIS) 8/00, Oct 2000; Food Standards Agency, Survey of Meat Content, Added Water and Hydrolysed Protein in Catering Chicken Breasts, FSIS 20/01, Dec 2001; Food Safety Authority-Ireland, Investigation into the Composition and Labelling of Imported Chicken Breast Fillets, May 2002; 'Agency Exposes Consumer Chicken Con', FSA Press Release (12.03.03); Shropshire Trading Standards Survey on Added Water and Salt in Pork Products, July 2004.

EXTRACT FROM MPR 2003:

SCHEDULE 3

Regulation 5(2)(b)

ADDED INGREDIENTS WHICH ARE NOT REQUIRED TO BE INDICATED IN THE NAME OF THE FOOD IN THE CASE OF A MEAT PRODUCT TO WHICH REGULATION 5 APPLIES

1. Any additive.
2. Any curing salt.
3. Any ingredient used solely as a garnish or decorative coating.
4. Any ingredient (not being an additive) that is added only in order to impart odour or taste or both.
5. Any salt, herb or spice used as seasoning.
6. Any starch that is added only for a technological purpose. ***[NB – this has been deleted, following amendment of the MPR 2003, in line with new EC rules.]***
7. Any protein (of either animal or vegetable origin) that is added only for a technological purpose. ***[NB – this has been deleted, following amendment of the MPR 2003, in line with new EC rules.]***
8. Any sugar that is added only in order to impart a sweet taste.
9. In the case of meat (whether cooked or uncooked) or cooked cured meat, added water making up not more than 5% of the weight of the product.
10. In the case of uncooked cured meat, added water making up not more than 10% of the weight of the product.

Notes:

For the purposes of item 1 of this Schedule, “additive” means any substance permitted for use in food by the Colours in Food Regulations 1995^(a), the Flavourings in Food Regulations 1992^(b), the Miscellaneous Food Additives Regulations 1995^(c) or the Sweeteners in Food Regulations 1995^(d).

[For the purposes of items 6 and 7 of this Schedule, “technological purpose” means any purpose within the meaning of “technological purposes” in point 4 of Chapter V of Annex B to Council Directive 77/99/EEC on health problems affecting intra-Community trade in meat products, as amended and updated by Council Directive 92/5/EEC^(e) and as further amended by Council Directive 97/76/EC^(f) - NB – this has been deleted, following amendment of the MPR 2003, in line with new EC rules.]

(a) S.I. 1995/3124, amended by S.I. 2000/481, 2001/3442.
S.I. 1992/1971, amended by S.I. 1994/1486, 1996/1499.

- S.I. 1995/3187, amended by S.I. 1997/1413, 1999/1136, 2000/3323, 2001/60, 2294, 3442, 3775 and S.I. 2003/1008.
- (d) S.I. 1995/3123; amended by S.I. 1996/1477, 1997/814, 1999/982, 2001/2294, 2002/379 and S.I. 2003/1182.
- (e) OJ No. L57, 2.3.92, p.1.
- (f) OJ No. L10, 16.1.98, p.25.

GLOSSARY OF TERMS AS USED IN THIS GUIDANCE

<u>Term</u>	<u>Definition</u>
Added ingredient	means any added substance, including any additive and any constituent of a compound ingredient, which is used in the preparation of a food and which is still present in the finished product even if in altered form, as defined by FLR (see also Annex 2).
Added water	<p>“added water” in a meat product is regarded as the quantity of water present in the product exceeding the quantity of water that would naturally be present in the meat part used in the product when raw. Added water content is calculated as the total weight of added water in the product expressed as a percentage of the total weight of the product as sold.</p> <p><u>Water not requiring ingredient listing (see section 2):</u></p> <ul style="list-style-type: none"> - does not include water used in preparing food, used as or partly used as medium which is not consumed, or does not exceed 5% of the finished product (in line with Regulation 16 of the FLR). - also does not apply to water used in the hygienic preparation of fresh, frozen or quick-frozen chicken or portions to which the EC Poultrymeat Marketing Regulations apply (i.e. 1906/90/EEC, as amended or Council Regulation 1234/2007 after July 2008).
Basted	common understanding of this term is that it is the application of added fat, butter and/or cooking juices applied to outside of the <u>cooked</u> meat (as in roasting meat) and not solely by addition of water.
Pre-basted / Self-basting	common understanding of this term is that it is the application of added fat and/or butter applied to the raw meat at point of manufacture / preparation and not solely by addition of water.
Catering Establishment	means a restaurant, canteen, club, public house, school, hospital or similar establishment (including a vehicle or a fixed or mobile stall) where, in the course of

	a business, food is prepared for delivery to the ultimate consumer and is ready for consumption without further preparation, as defined by FLR.
Cured meat	means a food consisting of meat and curing salt, whether or not the food also contains any other ingredient, as defined by MPR 2003.
Marinate	means the process of applying either: (i) a mixture of oils, vinegars, spices and herbs etc.; or, (ii) a mixture of water, salt, flavours, spices and herbs; or, (iii) a dry blend of spices, salt, flavours applied as coating to impart flavour into the meat through absorption over a period of time. Does not comprise of only a water/salt mixture but would normally include other flavouring ingredients such as spices, etc.
Meat Product	<p>means any food which consists of meat or which contains as an ingredient, or as ingredients the following: meat, mechanically recovered meat, or from any mammalian or bird species recognised as fit for human consumption, heart, tongue, the muscles of the head (other than the masseters), the carpus, the tarsus or the tail, as defined by MPR 2003.</p> <p>N.B. - it does not include raw meat to which no ingredient(s) has been added (other than proteolytic enzymes); or poultrymeat falling within the EC Poultrymeat Marketing Regulations, as amended; or any other product containing the fat, but no other meat, of any bird or animal.</p>
Water retaining agent	means an ingredient only intended to increase the water-binding capacity of meat.
Whole meats	means any meat product whether raw or cooked, or cured with the appearance of a meat cut, joint, slice, portion or carcass.

**EXTRACT FROM FSA'S 'CLEAR FOOD LABELLING' GUIDANCE
(OCTOBER 2002)**

Section 1.01 Print size and clarity

Do not hide, obscure or interrupt product information with any other written or pictorial matter. Make sure that all product information is easily visible and clearly legible.

Ideally use a font size of 10 point for the essential information in paragraph 8⁽¹⁾ of the guidance wherever possible. If this is not possible, the absolute minimum for this information should be 8 point.

Where it is necessary to consider which information to give in 10 point and which in 8 point because of space limitations, priority should be given to retaining the name of the food, the date mark and the list of ingredients in 10 point and as much of the other information as is possible.

Where packs are physically too small, or of a shape which cannot support 10 point type size, it is paramount to address other factors. These will include ensuring that non-essential information doesn't take up unnecessary space, the number of languages used, the type colour and font, and the layout of the label.

Use simple sans serif fonts with a good "x" height and avoid ornate fonts or distracting effects, like shadowing.

Use the normal weight of the font for standard text, and bold for emphasis.

Do not use all upper-case letters or underlining for emphasis.

Only use italics for isolated words – do not use them for large blocks of text, or for small font sizes.

Use the "range left" format, and avoid hyphenation and justified text.

⁽¹⁾ "Paragraph 8: Although the law only requires nutrition information when a nutrition claim is made, it is of increasing interest to consumers. Some consumers find the format prescribed in law for both voluntary and compulsory labelling difficult to use".

Print essential information in black type on a white background. If this is not possible, make sure there is a good tonal contrast between the type (which should be dark) and the background (which should be light).

Avoid “reversing out”, except possibly for headings in a large font size (at least 12 point). In any event, only use it for white type on a black background.

Do not place images behind text (“watermarking”).

Avoid the use of green and red together – it can be difficult to decipher. Strong colours work better than pastel shades.

Be careful when wrapping text around images – it can be difficult to read. In any case, always make sure the left-hand edge of the type is kept straight, and that wrapping the text doesn’t produce a line length that only consists of two or three words.

Metallic and shiny surfaces make reading difficult. Try to use a matt-finish printing surface.

Simple icons can help direct consumers to information (“signposting”). This can be particularly useful for cooking instructions (for example, pictures of a frying pan, oven and microwave). But make sure the icons will be easily recognisable.

It is important to ensure that numerals are distinct. The numbers 0, 3, 5, 6 and 8 can easily be misread in certain typefaces.

Adopt a consistent format when presenting information like nutrition labelling on a range of products to make it easier for consumers to identify and locate.

Increasing the printable area on pack

Give the essential information described in paragraph 2 top priority when designing labels. If you find it hard to follow this advice on ideal formats, consider the following ways of making more space available :

- Reducing space used for branding and claims
- Increasing the label size without obscuring sight of the product where this is important to consumers
- Using inside label space for information which does not govern choice, like detailed recipes
- Using a different type/style of label.