

Guidance on Pre-packed Food Labelling

Pre-packed foods are:-

- Put into packaging before being offered for sale
- Cannot be altered without opening or changing packaging
- Are ready for sale to the ultimate consumer or catering establishment

These requirements do not apply to pre-packed foods for direct sale, i.e. pre-packed by the retailer for sale by him on the same premises as packed, and foods sold at catering establishments. Fruit and vegetables individually wrapped in plastic film wrap for individual protection are also exempt from these requirements

Labelling requirements

Labelling requirements vary from product to product but as a general guide the following information is normally required:

- Name of the food
- Any treatment, e.g. freeze dried, frozen, irradiated, powdered
- List of ingredients including additives, flavourings, colourings
- Quantity
- Any special conditions of storage or use
- Date mark
- Name and address
- Origin
- Special nutritional claims
- Organic claims or any genetically modified ingredients added
- Any allergenic ingredients added

The labelling **must** be in English, but other languages can be used in addition to English.

The required labelling information must be marked:

- On the packaging; or
- On a label attached to the packaging; or
- On a label that is clearly visible through the packaging.

The information must be easy to understand, easy to read, easy to see and marked in a permanent and tamperproof way. The following, when they are required to be stated, must appear in the same field of vision as the name of the food:

- the date mark,
- the quantity, and
- the alcoholic strength in the case of alcoholic drinks.

Name of the food

This must either be:

- A name required by law, or
- A customary name for the food e.g. Banbury Cake, or
- A name or description sufficiently precise to inform the purchaser of the true nature of the food and which distinguishes it from similar products with which it could be confused.

The name cannot be a brand name, trade name or made up name. Certain specified names cannot be used unless the food composition meets the appropriate requirements e.g. beef-burgers.

Any treatment

If the food has been subjected to a treatment e.g. dried, freeze-dried, frozen, concentrated, smoked, or is in a certain physical condition e.g. powdered, then the name must include an indication of the treatment or condition, if a purchaser could be misled by its omission.

If the food has been irradiated then the name must include or be accompanied by the word "irradiated" or alternatively "treated with ionising radiation". It should also be accompanied with the identity and address of the facility, which carried out the irradiation or their official reference number.

For health and hygiene reasons it is advisable for retailers to warn consumers that meat and poultry which has been frozen and thawed should not be re-frozen.

List of ingredients

If the food contains more than two ingredients a full list of the ingredients (including water) in descending order of weight must be given under the heading "ingredients."

Additives, except flavourings and modified starch, must be declared by stating the category name followed by either its specific name or serial number e.g. "colour: tartrazine" or "colour: E102".

For flavourings and modified starch, it is sufficient to state the category names only i.e. "flavouring" or "modified starch" as appropriate.

The quantities of certain ingredients or category of ingredient, known as the Quantitative Ingredient Declaration (QUID), where either appears in the name of the food or is emphasised on the labelling in words, pictures or graphics, must also be shown, as a percentage, either:-

- a) in or next to the name of the food, or
- b) in the list of ingredients next to the ingredient name in question.

E.g. list of ingredients for cheese and tomato sandwich should include cheese X% and tomato Y%.

Storage and date mark

Any special conditions of storage or use and any instructions necessary to make proper use of the food must be shown. This would include storage, mixing or cooking instructions. This would also include the storage and instructions for use in order to ensure the food will keep until the stated durability date.

There are two types of durability dates:-

- a) The **best before** date is used for foods with a long shelf life and indicates the period for which a food can reasonably be expected to retain its optimum condition (e.g. it will not be stale).
- b) The **use by** date is the required only for those foods which are highly perishable from a microbiological point of view and which will have a product life after manufacture of a relatively short period, after which their consumption would present a risk of food poisoning.

Name and address

The food must be marked with the business name and address or registered office, of **either or both** of :-

- a) the manufacturer or packer, or
- b) a seller in the European Community.**

Origin

The place of origin should be indicated if its omission could mislead a purchaser.

Special nutritional claims

Nutritional information is only required to be given if a nutritional claim is made e.g. "Low Fat", "High Fibre" etc. However, if nutritional information is labelled voluntarily then it must comply with the Regulations.

If the food is labelled with claims such as "Low Calorie", "Diet", "High in Polyunsaturates", "Rich in Vitamins", then detailed information justifying the claim must be marked on the label. The composition of the food must also meet criteria specified in the Regulations to justify the making of the claim.

Organic, Genetically Modified (GM)

'Organic' can only be used to describe agricultural products and foods, which are produced and prepared in accordance with the detailed standards, laid down.

Where foods contain Genetically Modified (GM) soya or maize the label must indicate its presence.

Allergens

From the 25th November 2005, pre-packed food with added allergenic ingredients such as cereals containing gluten, crustaceans, eggs, fish, peanuts, soybeans and milk must declare these within the name of the food or within the name of the ingredient or within a separate allergy information/alert box.

Please note that the information given in this guidance note has no legal standing and is for guidance only. You are advised to seek your own independent professional advice, e.g. from a Public Analyst or Food Analyst, if you are producing your own labels. Please note that this information is subject to change due to amendments in the law from time to time.

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