

The SALSA Requirement:

“There shall be a system in place to ensure the labelling of product fully conforms to legislative and, where appropriate, customer requirements.”

About this SALSA Requirement:

This Requirement is intended to ensure there is a system in place in the business to ensure all labels are designed to fully conform to all appropriate labelling legislation. The main labelling requirements are covered by the Food Information to Consumers Regulation EU No. 1169/2011 (from December 13th 2014) but you should be aware of the other legislation affecting labelling.

Labelling is one of the most regulated areas in the food & drink industry. Regulations ensure that label descriptions match the product and make provisions for the presentation of nutrition information, product claims, descriptions, ingredients listings, quantities, allergens, customer storage instruction and shelf-life. As a food producer, you are required to comply with all of the relevant regulations and this Requirement is aimed at ensuring you can demonstrate this with confidence.

Please note that as a guidance tool only, we cannot possibly include all the information you would need to refer to and the checking of food labels is generally recognised as a specialist job requiring specialist knowledge. You are therefore not expected to have this knowledge within your business but you should know where to go to obtain it and where/when to use it.

Tools

- 🕒 Reliable sources of up-to-date advice/information
- 🕒 A system to generate label information
- 🕒 A system to ensure the correct label goes on the correct product and any online printing e.g. date code is correctly applied
- 🕒 Raw material specifications for all your ingredients
- 🕒 Finished product specifications/ recipes for all products
- 🕒 SALSA-approved Mentor or SALSA food labelling workshop

Tips

- ✓ Familiarise yourself with the general requirements for your product types
- ✓ Attending a SALSA food labelling course will provide evidence for this Requirement
- ✓ Check your labels before you print. Labels are a costly item to get wrong – for your pocket and your reputation.
- ✓ Review your labels if you change recipe/ ingredient/or ingredient supplier
- ✓ Don't copy a label for a similar product on sale without then checking all aspects yourself
- ✓ You will need to provide information when distance selling i.e. online sales

Additional Resources:

See **Tools & Tips** 3.2 and 1.6.2 for guidance and an example of raw material and finished product specifications.

See information available online: <https://www.gov.uk/food-labelling-and-packaging> and <http://labellingtraining.food.gov.uk/>

Some local authorities will offer a label checking/review service as part of their Trading Standards department but this may not be available in all regions. Your professional body or trade association may be able to provide assistance with labelling as part of your membership.

SALSA recognises that this is a specialist area and that legislation is continually evolving. To ensure confidence in your product labelling, we offer the following:

- Online additional labelling guidance documents in the Members Downloads section.
- Locally-based SALSA-approved Mentors can also help you or can find you the help you need
- One-day Food Labelling Workshops, which provide information on food labelling requirements. Discounted rate for members. Please see website for details in SALSA for Suppliers.

What do I need to do to show I comply with this Requirement?

You should have a system in place which details how your labels are checked to show that they conform to legislative, and where appropriate, customer requirements and how you ensure the correct labels are used on all your products.

To generate labelling information, it is best to create a document specifying the steps to follow to ensure all legal requirements are checked and fulfilled. See the example given in the Check Sheet section below. You should also keep a reference copy of all of your labels/outer packaging, with their completed checklist, and know what recipe each label applies to i.e. link it to your finished product specifications. In instances where recipes are liable to change, it can be helpful to add a code in small typeface to a label that relates to the particular and relevant recipe.

Do ask your printer to send you through a proof so you can check again before printing - and check again if amends are made! It is useful to have a second pair of eyes look over the proofs at an early stage. Keep a copy of all approved artwork.

In production, you should keep a copy of your labels on a daily basis for each product made. You may want to keep labels from start and end of runs (or more frequently) if you are producing large runs of products. Ensure these copies are signed and dated by a senior member of staff to confirm they have been applied to the correct product.

What does a Check Sheet look like?

This checklist is given as a guideline and applies mainly to packaged foods. You should refer to the relevant sections in legislation to determine which of the following are needed for your particular products and/or category – there are exemptions and different requirements for wholesale, foodservice, non pre-packed foods, food from vending machines etc. Use this list to create a document to generate your own labels and a sheet to check off the artwork created by you or your printers.

- **Product title, name of the food/ description and visual representation**
 - Will there be a full secondary description?
 - Does the image accurately show the product?
- **Minimum durability marking**
 - Is it Best Before, Best Before End or Use By?
 - Where will you show it? Have you verified it?
 - Is date of freezing required?
 - Additional traceability code required?
- **Quantity declaration**
 - Is it Weight, Volume or Count?
 - Average or minimum?
 - Is quantity declaration text at or above the minimum height?



Field of vision/ Font size

- Are Name of the food & Quantity (& % alcohol if needed) in the same field of vision?
- Is the font size for mandatory information at or above the minimum required?
- **Producer details**
 - Include your registered business name and address.
- **Ingredients list**
 - Are the ingredients listed in the correct order? i.e. highest to lowest ingredient quantities.
 - Have you broken down compound ingredients? e.g. chocolate.
 - Have you included QUID if relevant?
- **Allergen labelling**
 - Make sure you know if your product contains any of the 14 declarable allergens.
 - Consider carefully whether to use 'may contain' statements.
 - Are all allergens 'emphasised' in the ingredients list?
- **Storage**
 - Specify place rather than actual temperature e.g. Keep refrigerated
 - Include storage conditions and life after opening.
- **Nutrition information**
 - After December 2016 nutrition information per 100g is mandatory (check if your products are covered by any exemptions)
 - Is the correct format used?
 - Do you need to show per serving in addition to per 100g?
- **Claims**
 - Any and all health claims must be approved by the EU.
 - Nutrition claims have legal labelling requirements e.g. low fat, 'lite', high protein etc.
 - You must be able to back up any 'Free from' claims with evidence
 - Provenance claims must be accurate and verifiable
- **Customer advice**
 - Defrosting instructions
 - Cooking instructions
 - Instructions for use e.g. add milk
- **Product specific regulations**
 - You should know about any specific rules affecting your products e.g. jam, honey, waters, or your ingredients e.g. foods containing sweeteners
 - Meat and dairy products have specific regulations, so do chocolate and many others
 - Are your products covered by EU-protected names regulations (PGI or PDO)?
 - Health Mark
 - Country of Origin labelling is required for some ingredients e.g. certain meats
- **General**
 - Are all label details including pictures true, clear, accurate and verifiable?
 - Make sure that ingredients detail in the label declaration accurately reflects the raw material specification data, including any Provenance requirements, and your recipes / finished product specifications.

Remember, if in doubt, consult one of the recommended sources of advice shown above. Do not take any chances or risks and do not under any circumstances copy another company's label from a product that may be similar to yours – they may have got it wrong or your products may not be exactly the same.

How can I use this example in my business?

This example (above) is of a checklist which you should adapt to be appropriate for your business and one that should be set up as a controlled document. Make sure you include any points that are specific to your product types. It is a good idea to include space for two people to sign off the checks.