



Department  
for Environment  
Food & Rural Affairs

# Marking of Retail Goods Consultation

Date: February 2024

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We work closely with our 33 agencies and arm's length bodies on our ambition to make our air purer, our water cleaner, our land greener and our food more sustainable. Our mission is to restore and enhance the environment for the next generation, and to leave the environment in a better state than we found it.



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## About this Consultation

This consultation seeks views on the government's proposals to implement 'not for EU' labelling requirements for goods across Great Britain.

Throughout the process of agreeing and implementing the Windsor Framework, the UK Government has prioritised the security of Northern Ireland's integral place in the United Kingdom. The Government's motivation for extending 'not for EU' labelling requirements across GB is to maintain continuity of supply to Northern Ireland.

In this consultation, 'goods' means the following retail goods that are delivered at distribution terminals, such as:

- products of animal or plant origin
- plants other than plants intended for planting
- composite products
- other food
- food contact materials
- ready-to-sell pet food and dog chews

Distribution terminals include:

- places that distribute retail goods under controlled temperatures
- supermarket distribution centres
- wholesale outlets
- points of sale
- businesses that deliver directly to the final consumer, including catering operators, factory canteens, caterers in hospitals, care homes and prisons, restaurants and other food service operators and shops

See the [list of retail goods](#) falling within scope of the labelling scheme

## Audience

We welcome views from all interested stakeholders, including:

- businesses
- business representative organisations
- local authorities
- enforcement officers
- trade bodies
- non-governmental organisations
- consultants

- third sector organisations
- members of the public

## Responding to the consultation

Please respond to this consultation in one of the following ways;

- Online using the Citizen Space consultation hub at Defra [Marking of Retail Goods Consultation - Defra - Citizen Space](#)

Our preferred way of receiving responses is through the Citizen Space platform. If you are unable to use Citizen Space, you can download the consultation documents and return your response via email to:

- [markingofretailgoods.consultation@defra.gov.uk](mailto:markingofretailgoods.consultation@defra.gov.uk)

## Consultation period

This consultation will close on 15 March 2024.

## Confidentiality and data protection

A summary of responses to this consultation will be published on the government website at: <http://www.gov.uk/defra>. An annex to the consultation summary will list all organisations that responded but will not include personal names, addresses or other contact details.

Defra may publish the content of your response to this consultation to make it available to the public. They will not include your name and contact details.

If you click 'yes' in response to the question asking if you would like anything in your response to be kept confidential, you are asked to state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality. The reason for this is that information in responses to this consultation may be subject to release to the public or other parties in accordance with the access to information law (these are primarily the Environmental Information Regulations 2004 (EIRs), the Freedom of Information Act 2000 (FOIA) and the Data Protection Act 2018 (DPA)). We have obligations, mainly under the EIRs, FOIA and DPA, to disclose information to particular recipients or to the public in certain circumstances. In view of this, your explanation of your reasons for requesting confidentiality for all or part of your

response would help us balance these obligations for disclosure against any obligation of confidentiality. If we receive a request for the information that you have provided in your response to this consultation, we will take full account of your reasons for requesting confidentiality of your response, but we cannot guarantee that confidentiality can be maintained in all circumstances.

If you click 'no' in response to the question asking if you would like anything in your response to be kept confidential, we will be able to release the content of your response to the public. We will not make your name and contact details publicly available.

There may be occasions when Defra will share the information you provide in response to the consultation, including any personal data with external analysts. This is for the purposes of consultation response analysis and provision of a report of the summary of responses only.

Please find our latest privacy notice uploaded as a related document alongside our consultation document. Defra is the data controller in respect of any personal data that you provide. [Defra's Personal Information Charter](#) gives details of your rights in respect of the handling of personal data.

This consultation is being conducted in line with [government consultation principles](#).

If you have any comments or complaints about the consultation process email [consultation.coordinator@defra.gov.uk](mailto:consultation.coordinator@defra.gov.uk).

**Would you like your response to be confidential, under the terms defined above?**

- Yes
- No

If yes, please explain:

[Open text]

## 'About you'

Which of the following best describes you?

- I am a member of the public responding to this consultation out of my own interest
- I am a member of the public responding on behalf of a campaign or petition
- I am responding on behalf of a business
- I am responding on behalf of a business representative organisation
- I am an enforcement officer, trading standards officer, primary authority relationship manager or similar
- I represent an advisory body in the private sector
- Other – please specify

What's your full name? If you are representing an organisation, you will be asked its name later.

What's your email address?

## About your organisation

**What is the name of your organisation you are representing?**

**What type of organisation do you represent? Please select all that apply.**

- primary producer
- manufacturer
- supplier
- wholesaler
- haulier
- logistics
- retailer
- business representative organisation
- enforcement body
- local authority
- other – please specify

**What size is your organisation?**

- micro (1 to 9 employees)
- small (10 to 49 employees)

- medium (50 to 249 employees)
- large (250+ employees)

**If you are responding on behalf of an association, how many members does your organisation represent?**

- 0 to 9
- 10 to 100
- 101 to 250
- 251 to 1,000
- 1,001 to 5,000
- 5,001 to 10,000
- more than 10,000
- don't know
- not applicable

**What types of agri-food goods do you sell or provide services for? Select all that apply.**

- meat and meat products
- dairy products
- fish or fishery products
- other products of animal origin, for example - eggs, honey
- edible fruits, vegetables and plant-based products
- plants not intended for planting, for example - seeds, cut flowers
- animal or vegetable fats and oils
- composite products
- beverages, for example - soft drinks, alcohol and water
- shelf-stable products, for example - pasta, bread
- ready-to-sell pet food and dog chews
- frozen products
- not applicable
- other non-agri-food - please specify

**Where is your organisation registered? Please select all that apply.**

- England
- Scotland
- Wales
- Northern Ireland
- Republic of Ireland
- European Union, other than Republic of Ireland (please specify)
- Rest of world (please specify)

**What was your total revenue for the financial year 2022?**

Please only refer to revenue generated in the UK, that is Great Britain and Northern Ireland.



- [Open text]

**Has your organisation sent goods, or provided services, to the following geographical regions in the last 12 months?**

For all geographical regions you traded with, in the final column please indicate an estimated proportion of your business' revenue this region accounted for in the last 12 months.

	Yes	No	Not sure	% revenue
Great Britain (England, Scotland, or Wales)				
Northern Ireland				
Republic of Ireland				
European Union, other than the Republic of Ireland				
Rest of the world				

## Background

**What is the Windsor Framework and why does it require 'not for EU' labelling?**

The Windsor Framework refers to the arrangements for trade within the UK internal market following the United Kingdom's exit from the European Union. The framework facilitates the movement of goods between Great Britain (England, Scotland and Wales) and Northern Ireland.

The UK government confirmed new arrangements in the "Windsor Framework: a new way forward" [command paper](#), which provided easements for moving goods between Great Britain and Northern Ireland.

This included a new way to move prepacked retail goods from Great Britain into Northern Ireland. This is called the [Northern Ireland Retail Movement Scheme \(NIRMS\)](#).

NIRMS means that goods can move with reduced certification requirements, benefit from significantly reduced visual inspections and meet UK public health and safety standards.

In the [“Safeguarding the Union” command paper](#), we announced our intention to transition to the UK internal market system. Through our risk-based and intelligence-based management approach, we will provide clear legal direction to DAERA and other UK government authorities. This will eliminate any physical checks when goods move within the UK internal market system. Under these new arrangements, UK authorities will, as always, retain the vital ability to act on specific intelligence of criminality – such as abuse of the scheme, smuggling or disease risk.

In this scheme there are different requirements for labelling individual products and at box level in this scheme, as well as displaying signage in retail premises in Northern Ireland.

These requirements are being brought in through 3 phases listed below:

- Phase 1 (October 2023) - All meat and some dairy products must bear individual labels. In addition, all other products must be labelled at the box level.
- Phase 2 (October 2024) - In addition to the products in scope in phase 1, all dairy products must bear individual labels. All other products must be labelled at the box level.
- Phase 3 (July 2025) - In addition to phases 1 and 2, many other products must bear individual labels including composite products, fruit, vegetables, and fish. All other products must be labelled at the box level.

## How will products need to be labelled in Great Britain?

We propose that ‘not for EU’ labelling requirements will be introduced in Great Britain in 2 phases. These are the same product-level labelling requirements as those required by NIRMS as follows:

- from 1 October 2024 all meat and dairy products will need to be labelled individually (from 1 July 2025 this will be expanded to all retail goods in scope of Regulation (EU) 2023/1231)
- a significant number of goods are exempt from any kind of labelling - [see the list of goods that are exempt from labelling](#)
- there will be no box or shelf level labelling requirements of any kind for goods sold in Great Britain

This is a placing on the market requirement, meaning that, to sell certain goods in Great Britain, they must be labelled as ‘not for EU’. This requirement does not

extend to qualifying goods moving from Northern Ireland to Great Britain under [Unfettered Market Access rules](#).

Any labelling measures will be implemented in accordance with our international commitments, including those agreed at the World Trade Organisation.

This consultation seeks stakeholder views on the implementation of this labelling policy. We want to hear from you about:

- your or your business’ trade within the UK internal market – in particular with Northern Ireland
- how you would expect to see this policy enforced
- how you’re already preparing, or will prepare, to introduce these requirements
- any challenges you might face in introducing these requirements, and how you see this being managed
- expected impacts (including costs and benefits)
- where you think targeted exemptions may help to ensure these requirements are implemented effectively, for example exemptions for types of product or types of business

## Understanding of this policy

**Q1. To what extent do you agree or disagree with the following statements, in relation to your understanding of the proposed policy?**

[OBJ]	<u>Strongly agree</u>	<u>Somewhat agree</u>	<u>Neither agree nor disagree</u>	<u>Somewhat disagree</u>	<u>Strongly disagree</u>	<u>Not applicable</u>
I understand which products my business will be expected to label	[OBJ]	[OBJ]	[OBJ]	[OBJ]	[OBJ]	[OBJ]
I understand when my business would be expected to make the proposed	[OBJ]	[OBJ]	[OBJ]	[OBJ]	[OBJ]	[OBJ]

labelling changes						
I understand how my business would be expected to make the proposed labelling changes						
I understand what the 'not for EU' labelling means						

**Q1a. If you have disagreed with any of the statements above, please explain why?**

- Open text

**Q1b. Is there anything the government can do to improve your understanding?**

- Open text

**The remaining questions are asking for trade information from businesses, views on compliance, enforcement and exemptions, and potential business impacts. Would you like to respond to these questions?**

- Yes (Go to Trade with Northern Ireland section)
- No (Go to Feedback section)

## Trade with Northern Ireland

**Q2. Has your business registered for the Northern Ireland Retail Movement Scheme (NIRMS)?** NIRMS is a new, simplified way to move prepacked retail goods from Great Britain into Northern Ireland (where the final consumer is in Northern Ireland). It started on 1 October 2023.

- Yes, my business has registered for NIRMS
- No, my business has not registered for NIRMS yet but intends to register
- No, my business has not registered for NIRMS and does not intend to register
- Don't know

- Not applicable

**Q3. Is your business using the Northern Ireland Retail Movement Scheme (NIRMS) to move goods to Northern Ireland?**

- Yes, my business has been using NIRMS for all of our goods
- Yes, my business has been using NIRMS but only for some of our goods
- Yes, my business has using NIRMS for some of our goods, with the intention of increasing use in future
- No, my business is not currently using NIRMS for goods, but intends to use it in future
- No, not directly, but businesses in our supply chain have been using NIRMS for our eligible goods
- No, my business has no intention of ever using NIRMS
- Don't know
- Not applicable

**Q3a. Has your business already implemented 'not for EU' product-level labelling changes for goods sold from Great Britain to Northern Ireland, under the Northern Ireland Retail Movement Scheme?**

- Yes - all agrifood goods destined for Northern Ireland
- Yes - all Phase 1 goods destined for Northern Ireland (meat and some dairy)
- Yes - all phase 1 and phase 2 goods destined for Northern Ireland (meat and all dairy)
- No
- Don't know
- Not applicable

**Q3b. What has the Northern Ireland Retail Movement Scheme (NIRMS) meant for your business operations in relation to moving goods to Northern Ireland?**

The Official Controls Regulations were established to provide a uniform approach to official controls, including biosecurity and sanitary and phytosanitary checks, across the agri-food supply chain. It allows members of the single market to be sure that the competent authorities are conducting controls in a suitably rigorous and impartial manner.

[More information about the official controls \(animals, feed, food and plant health fees\) regulations 2019.](#)

- My business has continued selling our full range of products to Northern Ireland using NIRMS in place of the Scheme for Temporary Agri-food Movements to Northern Ireland (STAMNI)
- My business has continued selling our full range of products to Northern Ireland using full [Official Control Regulations](#) (OCR), the 'red lane')

- My business has continued selling our full range of products to Northern Ireland using a combination of NIRMS and full OCR that suits my business' needs.
- My business has reduced the range of products it sells in Northern Ireland
- My business has stopped selling to Northern Ireland or has withdrawn all products from the Northern Ireland market
- My business has restarted supplying products to Northern Ireland using NIRMS after pausing following EU exit
- Don't know
- Not applicable
- Other (please specify)

**Q3c. What role, if any, have the 'not for EU' labelling requirements of the Northern Ireland Retail Movement Scheme (NIRMS) had on your business' decision to use or not use NIRMS?**

If NIRMS is not relevant to the operations of your business, please select 'not applicable'.

- My business does not use NIRMS, and the labelling requirements are the sole reason for this
- My business does not use NIRMS, and the labelling requirements are one reason, amongst other reasons, for this
- My business does not use NIRMS, and the labelling requirements are not a reason for this
- My business uses NIRMS, the labelling requirements are not a reason for this
- Not applicable
- Other - please specify

**Q3d. Would the introduction of 'not for EU' labelling across Great Britain make your business more or less likely to use the Northern Ireland Retail Movement Scheme?**

- Much more likely
- Somewhat more likely
- Neither likely nor unlikely
- Somewhat less likely
- Much less likely
- Not applicable

**Q4. If your business has already made the labelling changes required to use the Northern Ireland Retail Movement Scheme, has your business faced any costs beyond routine labelling change costs?**

- Yes (Go to Q4a - d)

- No (Go to Compliance and enforcement section)
- Don't know (Go to Compliance and enforcement section)
- Not applicable (Go to Compliance and enforcement section)

**Q4a. How much was the upfront one-off labelling cost for your business?**

Cost in £ [Numeric answer]

**Q4b. How much are the anticipated ongoing costs for your business per year?**

Cost in £ [Numeric answer]

**Q4c. How long did it take for your business to implement these changes?**

[Open text]

**Q4d. What effect did this implementation have on labour costs?**

- Increase
- Decrease
- No change

**Q4e. How many hours of labour did this change involve (if any)?**

[Open text]

## Compliance and enforcement

To ensure that businesses are meeting the proposed requirements in an effective way, Defra will develop an enforcement policy that enables reasonable, proportionate and risk-based action, which is consistent with good practice.

The following options are being considered:

### 1. Primary Authority partnership

Businesses could enter a Primary Authority partnership and receive, and follow, assured and consistent regulatory advice.

- Primary Authority is a means for businesses to receive assured and tailored advice on meeting regulations such as those covering environmental health, trading standards or fire safety through a single point of contact. This ensures businesses get it right at the outset and enables all businesses to invest with confidence in products, practices and procedures, knowing that the resources they devote to compliance are well spent. Primary Authority is based on legal "Primary Authority" partnerships between businesses and individual local authorities or fire and rescue authorities. It enables businesses to receive customised advice from the Primary Authority in relation to complying with legislation that is in scope of the scheme. Partnerships are available to any

type of business, whether starting out or established, as well as other types of organisations such as trade associations.

The 2 types of Primary Authority partnerships are:

- **Direct partnerships:** A business can form its own direct partnership. It then receives Primary Authority advice tailored to its specific needs from its Primary Authority (its chosen local authority).
- **Co-ordinated partnerships:** A business can belong to a trade association (or other type of 'regulated group') to benefit from a co-ordinated Primary Authority partnership. In this case, the Primary Authority advice is still provided by the Primary Authority, but is shared via the trade association, and tailored to the general needs of its members.

## **2. Self-reporting**

Businesses could be asked to self-report. This could include completing a questionnaire confirming compliance or sending photographic evidence of labels to the competent authority or enforcement body.

## **3. Food authorities spot checks**

Business compliance could also be determined by food authority officers (based in local authorities) who carry out checks and other enforcement activities, either as part of routine food inspections, or where complaints or other intelligence indicates a check is required.

# **Enforcement approach**

To ensure compliance with the proposed requirements, there are a range of enforcement options that could be used to address non-compliance.

The following options are being considered:

## **1. Education**

If a business is found to be non-compliant, the authorised officer may issue the business with further information and advice, such as letters about enforcement issues, determining the appropriate action to meet compliance, and further guidance on compliance.

## **2. Improvement notices**

If a business is found to be non-compliant and the authorised officer has reason to believe that other approaches will not result in a successful outcome, the authorised officer can issue an improvement notice. This will detail the offence that has been committed, the actions expected to be taken by when, and what will happen if action is not taken. Failure to comply with the requirements of a notice within the specified period may lead to issuance a further notice, or it may be deemed as an offence.



### **3. Civil sanctions**

A civil sanction is a monetary penalty for non-compliance. Civil sanctions can be imposed by the competent authority to a business that has been found to be non-compliant. The value of the penalty may be dependent on the extent of non-compliance.

Defra understands that meeting new labelling requirements can take time. We are therefore considering the use of a hierarchy of enforcement to support businesses towards a pathway to compliance.

This section relates to regulation 5 of the indicative Statutory Instrument (SI) included with this consultation.

#### **Q5. Do you have a preferred enforcement option?**

(Please select all that apply)

- Primary Authority partnerships
- Self-reporting
- Food authorities spot checks

#### **Q5a. Do you understand what Primary Authority is?**

- Yes
- No

#### **Q5b. Are you currently entered into a Primary Authority agreement or scheme?**

- Yes
- No
- Not applicable

#### **Q5c. Are you a member of a trade association that has entered into a Primary Authority agreement?**

- Yes
- No
- Don't know
- Not applicable

#### **Q5d. Would you be willing to enter into a Primary Authority agreement to get assured advice on this policy?**

- Yes
- No
- Don't know
- Not applicable

**Q6. Would you be willing to complete a questionnaire and provide photo evidence that you had the required labels?**

- Yes
- No
- Not applicable

**Q7. We are considering the following options for instances of non-compliance with this policy. Please state whether you agree or disagree that these are reasonable and proportionate approaches?**

	Agree	Disagree
Education		
Improvement notices		
Civil sanctions		

**If you disagree with any of the above, please explain why:**

[Open text]

**Q8. Do you have any concerns about the practicalities of complying, within the timeframe?**

(If you are responding on behalf of a regulatory authority please respond about whether you have any concerns about enforcing this policy within the timeframe.)

- Yes
- No

**If yes, please explain:**

[Open text]

**Q9. Do you have any recommendations around how compliance could be encouraged?**

[Open text]

**Q10. Should businesses be offered the opportunity to correct most issues that have been identified before further enforcement is considered?**

- Yes
- No

**Please explain your answer:**

[Open text]

**Q11. Are there other flexibilities that the government could consider in the development of its enforcement regime that would help you or your business to comply with the requirements?**

- Free text

## Exemptions and transitional periods

We recognise that the proposed labelling requirements represent a substantial change for industry and that the proposed measures within this policy may affect businesses in different ways.

In keeping with the standard approach to the introduction of new domestic schemes, including those established through the Windsor Framework, we are considering how best to exercise flexibility during the initial phase of implementation. Beyond those exemptions already provided for by the Windsor Framework itself (see [Gov.uk](https://www.gov.uk) for list of exemptions under NIRMS), the government recognises that some types of business may find it more difficult, or that some types of good may be more challenging to label, and therefore exemptions may smooth the implementation of these requirements. For example, it is recognised that a number of small and/or local food producers and outlets, such as farm shops, may not have the resources to implement these changes.

In addition, we are considering applying exemptions to small and/or medium sized businesses (for the purpose of this consultation, small and medium businesses are as defined in sections 7(1) and 33(2) of the Small Business, Enterprise and Employment Act 2015). This is in keeping with the government's commitment to protect these companies and make the UK the best place in the world to start a business.

Additionally, we are looking into allowing goods that have been placed on the market in Great Britain before the provisions come into force to continue to be sold until stocks are exhausted.

This section relates to Regulation 4 and 6 of the indicative Statutory Instrument included with this consultation.

**Q12. What impact, if any, might the proposed exemptions have on your business?**

- Very positive
- Somewhat positive
- Neither positive nor negative
- Somewhat negative
- Very negative
- Don't know
- Not applicable

**Q12a. What impact, if any, might the proposed transitional periods have on your business?**

- Very positive
- Somewhat positive
- Neither positive nor negative
- Somewhat negative
- Very negative
- Don't know
- Not applicable

**Q12b. Please explain how, if at all, the proposed exemptions or transitional period might impact your business?**

[open text]

**Q13. Are there any goods in your supply chain that would be particularly challenging to label and warrant exemption?**

[open text]

**Q14. Are there any other reasonable exemptions that should be considered?**

[open text]

**The remaining questions are about potential business impacts of the policy. Would you like to respond to these?**

- Yes (Go to Labelling in Great Britain section)
- No (Go to Feedback section)

## Labelling in Great Britain

**Q15. Currently, does your business already produce different labels for different markets?**

- Yes
- No
- Not applicable

**Q16a. If 'not for EU' labelling changes were not required across Great Britain, my business would make the changes anyway**

- Strongly agree
- Somewhat agree
- Neither agree nor disagree
- Somewhat disagree
- Strongly disagree
- Not applicable

**Q16b. Has your business already implemented 'not for EU' product-level labelling changes for goods sold within Great Britain? For instance, has your**

**business already started applying 'not for EU' labelling for goods 'staying' in Great Britain?**

- Yes – to all agrifood goods
- Yes – to all meat and dairy
- Yes – to some meat and dairy
- No
- Don't know
- Not applicable

**Q16c. How does your business intend to respond to the proposed 'not for EU' labelling requirement across Great Britain? Please select all that apply to you.**

- My business has already made the required changes
- My business intends to re-design individual product packaging to add 'not for EU' label
- My business intends to over-sticker individual products to add a 'not for EU' label
- My business intends to ink-jet individual products with 'not for EU' label
- My business intends to stop supplying products to Great Britain temporarily until required changes can be implemented.
- My business intends to stop supplying products to Great Britain permanently.
- I do not know what my business will do
- Not applicable
- Other - please specify

**Q16d. Within your supply chain, who would you expect to make the changes required to meet the labelling requirements? Please select all that apply to you.**

- Supplier
- Manufacturer or processor
- Retailer
- Logistics provider
- Other - please specify

**Q17. On average, for each product your business sells or manufactures, how many additional production lines will your business need to introduce due to this legislation?**

- No additional production lines
- Less than one additional production line (some, but not all products will require an additional production line)
- One additional production line (each product will require an additional production line)
- Other - please specify

**Q17a. What percentage of stock keeping units, or individual product lines, if any, does your business forecast will need to be relabelled to meet the proposed labelling requirements?**

A stock keeping unit (SKU), is an alphanumeric code that a retailer assigns to a distinct type of product once it arrives from a distributor or warehouse to keep track of stock. If your business does not apply SKUs please identify individual product units.

- Percentage: \_\_\_\_\_.
- None
- Don't know
- Not applicable

**Q17b. What percentage of stock keeping units (SKUs), or individual product lines, if any, does your business forecast could be withdrawn or delisted from the market in Great Britain as a result of the proposed labelling requirements?**

- Percentage: \_\_\_\_\_.
- None
- Don't know
- Not applicable

**Q17c. Which products, if any, are at the greatest risk of being withdrawn or delisted from the market in Great Britain?**

- My business has products at risk - please specify
- None
- Don't know
- Not applicable

**Q18. What kind of additional financial costs might your business incur to implement proposed labelling requirements in the specified timelines? Please select all that apply:**

- Costs of redesigning packaging
- Costs of purchasing 'not for EU' labels, such as stickers
- Costs of additional labour or staff
- Costs of wasted packaging due to relabelling
- Costs of additional storage space – for example, renting an additional warehouse
- Costs of additional transportation – for example, due to separation of goods destined for EU and those destined for Great Britain
- Costs of separating production lines – for example, separating Great Britain products from those destined for other markets
- No additional cost
- Other - please specify

**Q18a. Please provide an estimate of the potential costs of the following:**

Please include cost estimates where possible.

Package redesign:

- One-off cost
- Ongoing annual cost
- Don't know
- Not applicable

One-off cost estimate: [open text]

Ongoing annual cost estimate: [open text]

Purchasing 'not for EU' labels:

- One-off cost
- Ongoing annual cost
- Don't know
- Not applicable

One-off cost estimate: [open text]

Ongoing annual cost estimate: [open text]

Additional labour:

- One-off cost
- Ongoing annual cost
- Don't know
- Not applicable

One-off cost estimate: [open text]

Ongoing annual cost estimate: [open text]

Wasted packaging

- One-off cost
- Ongoing annual cost
- Don't know
- Not applicable

One-off cost estimate: [open text]

Ongoing annual cost estimate: [open text]

Additional storage space:

- One-off cost
- Ongoing annual cost
- Don't know
- Not applicable

One-off cost estimate: [open text]

Ongoing annual cost estimate: [open text]

Additional transportation:

- One-off cost

- Ongoing annual cost
  - Don't know
  - Not applicable
- One-off cost estimate: [open text]  
Ongoing annual cost estimate: [open text]

Additional production lines:

- One-off cost
  - Ongoing annual cost
  - Don't know
  - Not applicable
- One-off cost estimate: [open text]  
Ongoing annual cost estimate: [open text]

Other – please list:

- One-off cost
  - Ongoing annual cost
  - Don't know
  - Not applicable
- One-off cost estimate: [open text]  
Ongoing annual cost estimate: [open text]

**Q18b. What overall proportion of the above costs do you anticipate passing on to consumers?**

- 0%
- 1 to 20%
- 21 to 40%
- 41 to 60%
- 61 to 80%
- 81 to 100%
- Don't know
- Not applicable

**Q19. What are the benefits to your business of implementing the proposed labelling requirements? Please select all that apply.**

- Maintained or increased product ranges supplied to Northern Ireland
- Maintained or increased ability to provide goods sourced from Great Britain to Northern Ireland
- Cost savings from reduced spoilage from UK-wide production line
- Reduced labour requirements from simpler logistics of UK-wide production line
- Cost savings from improved storage requirements of UK-wide production line
- Reduced transportation costs from UK-wide production line



- Reduced inventory requirements from UK-wide production line
- No additional benefits
- Other - please specify

**Q19a. Please provide an estimate of the potential cost savings from the following:**

Please include cost saving estimates where possible.

Reduced spoilage:

- One-off cost saving
- Ongoing annual cost saving
- Don't know
- Not applicable

One-off cost saving estimate: [open text]

Ongoing annual cost saving estimate: [open text]

Reduced labour costs:

- One-off cost saving
- Ongoing annual cost saving
- Don't know
- Not applicable

One-off cost saving estimate: [open text]

Ongoing annual cost saving estimate: [open text]

Improved storage:

- One-off cost saving
- Ongoing annual cost saving
- Don't know
- Not applicable

One-off cost saving estimate: [open text]

Ongoing annual cost saving estimate: [open text]

Reduced transportation costs:

- One-off cost saving
- Ongoing annual cost saving
- Don't know
- Not applicable

One-off cost saving estimate: [open text]

Ongoing annual cost saving estimate: [open text]

Reduced production lines:

- One-off cost saving
- Ongoing annual cost saving
- Don't know
- Not applicable

One-off cost saving estimate: [open text]  
Ongoing annual cost saving estimate: [open text]

Other – please list:

- One-off cost saving
- Ongoing annual cost saving
- Don't know
- Not applicable

One-off cost saving estimate: [open text]  
Ongoing annual cost saving estimate: [open text]

**Q20. Can the proposed timeframes for these labelling changes be incorporated into your business' routine labelling changes?**

If your business is affected by the proposed labelling changes, but is not expecting to be directly implementing the labelling of some or all affected products, please provide an answer to the best of your understanding.

- Yes – in full
- Yes – in part
- No
- Don't know
- Not applicable

**If no, please explain why.**

[open text]

## Wider impacts

**Q21a. I anticipate that the proposed labelling requirements would have one-off or initial impact on my business in the following ways:**

	Substantial decrease	Slightly decrease	No change	Slightly increase	Substantial increase	Don't know	Not applicable
Profits my business makes							

The range of goods or services my business supplies to Northern Ireland consumers or businesses							
The range of goods or services my business supplies to Great Britain consumers or businesses							
Ease of trading with Great Britain							
Ease of trading with Northern Ireland							
Ease of trading with the Republic of Ireland							

Ease of trading with the EU							
Ease of trading with the rest of the world							

**Q21b. I anticipate that the proposed labelling requirements would have ongoing impacts to my business in the following ways:**

	Substantial decrease	Slightly decrease	No change	Slightly increase	Substantially increase	Don't know	Not applicable
Profits my business makes							
The range of goods or services my business supplies to Northern Ireland consumers or businesses							
The range of goods or services my business supplies to Great Britain consumers or businesses							
Ease of trading with Great Britain							

Ease of trading with Northern Ireland							
Ease of trading with the Republic of Ireland							
Ease of trading with the EU							
Ease of trading with the rest of the world							

**Q22. What is the likelihood of your business making the following changes in response to the proposed labelling changes? (This could be the result of an action directly by your business, or a result of actions of businesses elsewhere in your supply chain.)**

	Very unlikely	Somewhat likely	Neither likely nor unlikely	Somewhat likely	Very unlikely	Don't know	Not applicable
Increasing cost to consumers							
A change to my business model							
A change to my supply chain							
Ceasing trading entirely (your business closing)							



Rest of the world									
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**Q25. To what extent do you expect the proposed labelling changes to impact the volume of goods or services you receive from the following regions or countries?**

	Would start buying	Substantially increase	Slightly increase	Stay about the same	Slightly decrease	Substantially decrease	Would stop buying	Don't know	Not applicable
Great Britain									
Northern Ireland									
European Union									
Rest of the world									

**Q26. What support would you require from the UK government to implement the proposed labelling changes?**

- Open text

**Q27. Are you willing to be contacted to provide further information about your responses to this consultation?**

- Yes
- No
- Not applicable

## Consultee Feedback on the Online Survey

Thank you for taking your time to participate in this online survey. It would be appreciated, if you can provide us with an insight into how you view the tool and the any area(s) you feel is in need of improvement, by completing our feedback questionnaire.

**Q28. Overall, how satisfied are you with our online consultation tool?**

- Very satisfied
- Satisfied
- Neither satisfied nor dissatisfied
- Dissatisfied
- Very dissatisfied
- Don't know

Please give us any comments you have on the tool, including suggestions on how we could improve it.