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**FOOD LABELLING
CLEAR FOOD LABELLING
GUIDANCE**

INTRODUCTION

The Food Standards Agency is committed to promoting informed consumer choice.

The aims in producing this Guidance are to help manufacturers, producers and retailers to provide food label information for pre-packed foods in a clear way that is helpful to consumers, and to be aware of the law in the UK that is relevant to clear food labelling for pre-packed foods.

Annex 1 to this Guidance (Clear Food Labelling: Relevant Legislation) provides further information on legal requirements.

Note:

The examples in this document are provided for illustration only. The advice and examples should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. Ultimately only the courts can decide whether, in particular circumstances, an offence has been committed.

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ANNEX 1 CLEAR FOOD LABELLING: RELEVANT LEGISLATION

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RATIONALE

Introduction

1. There is legislation in place that requires product information on food labels to be easily visible and clearly legible. Despite this, over several years, the Agency's research and public consultations have confirmed that many consumers find food labels difficult to use.
2. The volume of information legally required on labels has increased in recent years. This, with increases in the amount of information provided voluntarily by manufacturers, has led to overcrowding on the labels of many products.
3. Since 2001 the Agency has been working towards improved label clarity. In 2002 the first Clear Food Labelling Guidance was published, which introduced best practice advice on achieving label clarity. In 2005 the Agency carried out research to assess the extent of uptake of the best practice advice.
4. The Agency's research noted that some recommendations (e.g. appropriate use of signposting, date marking) were widely adhered to. However, the recommendation on minimum font size was highlighted as being one piece of advice rarely followed by industry, with some 89% of those products surveyed using a font smaller than the recommended 8 point for mandatory information. Additionally, a number of products were assessed to have undue emphasis given to features such as brand information at the expense of essential information.
5. Following a meeting with stakeholders in 2006 the Agency undertook to revise the Guidance to provide best practice advice that encourages greater clarity, while recognising the need for a flexible approach. The revised advice also takes account of the UK's ageing population and concerns that sight problems are expected to increase in the future. This Guidance will therefore assist consumers with visual impairment by addressing issues such as font size and type, and contrast etc. The Royal National Institute for the Blind (RNIB) has been consulted on the revised Guidance and their advice has informed the draft. The relevant legal requirements are outlined in separate sections.

Aims of the Guidance

6. The objectives of the Guidance are as follows:
 - To improve labelling practice with respect to clear labelling and awareness of existing legislation on clear labelling in the manufacturing and retail sectors.

- To improve consumer confidence in labelling through improved clarity, particularly bearing in mind visual impairment issues.
- To provide enforcement authorities with guidance to help them improve labelling advice.

7. With respect to clear labelling three areas of difficulty have been identified:

- finding information;
- reading it; and
- understanding how to use it.

8. The Guidance makes recommendations to tackle the first two of these issues. It draws on existing guidelines, particularly those published by the Institute of Grocery Distribution (IGD) on print size and clarity.

9. Recommendations made by the Task Force set up by the Agency in 2001 aimed at helping consumers understand the information on food labels have been taken forward separately. In 2003 the Agency launched its Eatwell website which now features an 'interactive label' that enables users to find out about how to use information provided on labels.

10. The Agency recognises that products come in all shapes and sizes and therefore all labels cannot be expected to conform to a single format. The Agency's approach has been to develop a suggested ideal format which can be used on products, supplemented by a "second best" option which can be used where size and/or shape precludes use of the ideal.

11. Our aims in producing the Guidance are to help:

- Manufacturers, producers and retailers to be aware of the law by bringing together relevant legislation on clear labelling, and to produce labels with the highest clarity that is practicable by following best practice.
- Enforcement authorities to have an easily accessible reference source on clear labelling legislation and best practice.
- Consumers by encouraging industry to produce clear food labels.
- Visually impaired consumers by addressing their specific requirements in relation to legibility.

12. When designing a label it is important that the design team considers that consumers often read labels when they are short of time or when light conditions are not ideal. Time restraints and distractions can reduce capacity for concentration when shopping. Although many shops are well lit, people's homes vary in lighting levels. Also, food may be prepared and consumed by people other than those who read the label in the shop, so it is important that label information for the purposes of safety, nutrition and choice, is clear to read at the point of consumption.

PART 1: COMPLYING WITH THE LEGISLATION

RULES GOVERNING INTELLIGIBILITY AND WHAT MUST APPEAR ON THE LABEL

INTRODUCTION

13. The Food Labelling Regulations 1996 contain requirements on what must appear on the food and on how it must appear. These requirements are outlined below.

FOOD LABELLING REGULATIONS 1996

14. Regulation 5 of the Food Labelling Regulations 1996 requires the food to carry information as follows:

“Subject to the following provisions of this Part of these Regulations, all food to which this Part of these Regulations applies shall be marked or labelled with-

- (a) the name of the food;
- (b) a list of ingredients;
- (c) the quantity of certain ingredients or categories of ingredients
- (d) the appropriate durability indication;
- (e) any special storage conditions or conditions of use;
- (f) the name or business name and an address or registered office of either or both of:-
 - (i) the manufacturer or packer, or
 - (ii) a seller established within the European Community;
- (g) particulars of the place of origin or provenance of the food if failure to give such particulars might mislead a purchaser to a material degree as to the true origin or provenance of the food; and
- (h) instructions for use if it would be difficult to make appropriate use of the food in the absence of such instructions.”

15. Regulation 38 of the Food Labelling Regulations 1996 requires Intelligibility as follows:

- “(1) The particulars with which a food is required to be marked or labelled by these Regulations, or which appear on a [menu], notice, ticket or label pursuant to these Regulations, shall be easy to understand, clearly legible and indelible and, when a food is sold to the ultimate consumer, the said particulars shall be marked in a conspicuous place in such a way as to be easily visible.
- (2) Such particulars shall not in any way be hidden, obscured or interrupted by any other written or pictorial matter.”

PART 2: ADVICE ON BEST PRACTICE - RECOMMENDATIONS

NOTE: THIS BEST PRACTICE ADVICE IS VOLUNTARY. Industry may wish to consider following it in order to provide information in the clearest way.

16. Throughout this section, footnotes direct the reader to Annex 1 (Clear Food Labelling: Relevant Legislation) that contains outlines of relevant legal requirements.

ESSENTIAL INFORMATION AND GROUPING

17. The information that consumers need to make informed purchase decisions and to use the food product safely should be grouped together within defined borders. Either do this on any single face of the pack, or in the same field of vision on the pack¹.

18. This information consists of²:

- Name of the food;
- Net weight or volume, where required;
- List of ingredients;
- Date mark, or a reference to where it can be found;
- Instructions for use and/or storage,
- Nutrition information, if required;
- Quantity of certain ingredients or categories of ingredients (QUID) if required,
- Alcoholic strength, if appropriate
- Origin information, if required; and
- Customer care line information (or other information about how to contact the manufacturer, packer or seller).

Customer care line or similar information is included here because of the value of its use to those with visual impairment and the general population.

¹ For relevant legislation on field of vision requirements see Reference 1 (Section 1.2) in Annex 1 (“Clear Food Labelling: Relevant Legislation”).

² For relevant legislation on essential information see Reference 2 in Annex 1 “Clear Food Labelling: Relevant Legislation” which contains outlines of requirements that control provision of compulsory information, specific indications such as allergens, information that must be provided under certain circumstances such as origin and other rules on declaration of GM ingredients and alcoholic strength as well as rules relating to packaging and controlling lot marking.

19. Where it is not possible to group the information listed in paragraph 18 together as described in paragraph 21, group it separately as follows and use directions between the two groups. Present the information in each group on the same pack face or, if that is not possible, in the same field of vision. Any additional allergen information should be in the same field of vision as the ingredients list.

Figure 1: Grouping of information

Group A	Group B
<ul style="list-style-type: none"> • Name of the food 	<ul style="list-style-type: none"> • List of ingredients
<ul style="list-style-type: none"> • Date mark, or a reference to where it can be found 	<ul style="list-style-type: none"> • Use instructions
<ul style="list-style-type: none"> • Storage instructions 	<ul style="list-style-type: none"> • Nutrition information other than Signposting
<ul style="list-style-type: none"> • Origin if legally required 	<ul style="list-style-type: none"> • (Any additional allergen information)
<ul style="list-style-type: none"> • Net weight or volume, where required 	
<ul style="list-style-type: none"> • Alcoholic strength, where appropriate 	
<ul style="list-style-type: none"> • (Any voluntary Nutrition Signposting) 	

Please note that it is a legal requirement that quantitative ingredient declaration (QUID), if required, must be placed either with the name of the food or the list of ingredients³.

The customer care line information or other information identifying the manufacturer / packer / seller may be placed with either group.

20. When grouping items as recommended in paragraphs 17 and 19 bear in mind that legislation may require other specific indications to be given (e.g. instructions for use or declarations about the presence of sweeteners, genetically modified ingredients (GM), caffeine, glycyrrhizinic acid or indications of irradiation)⁴.

21. Only direct consumers to look elsewhere on the label for information where absolutely necessary. Make sure the instruction is clear and, if

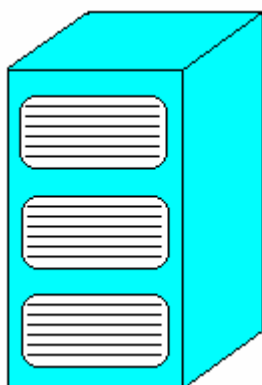
³ See Food Labelling Regulations 1996, Regulation 19 (3) (b), in Reference 1 (Section 1.2) in Annex 1 “Clear Food Labelling: Relevant Legislation”.

⁴ For relevant legislation on requirements specific indications see Reference 2 (Section 2.2) in Annex 1 “Clear Food Labelling: Relevant Legislation”

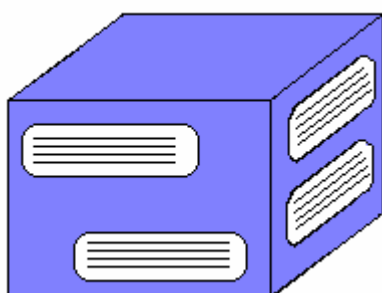
directing to more than one item of information, try to put all of this material in the same place.

22 Do not give identification marks or lot marks unnecessary prominence or emphasis, as this may tend to mislead, for example as to the origin of the food, or to lead to confusion with date marks.

Figure 2: Grouping of information



(i) All mandatory information should ideally be positioned on any single face of the pack within defined borders.



(ii) Where space does not allow for all information to be on a single face the information in group A could appear on different faces in the same field of vision. Information could be divided into groups A and B which need not share the same field of vision.

PRINT SIZE AND CLARITY, FORMAT, CONTRAST AND QUALITY

23. An absolute minimum print size of 8 point may be used for the information in paragraph 18 provided that other factors that promote clarity i.e. **contrast, text format** and **print quality** are present to a high standard. If any of these factors are compromised, a larger print size (at least 10 point) should be used to ensure the labelling is easily legible. For this information a larger size should be used if space is not restricted and for light text on a dark background the minimum size for any text should be 12 point.

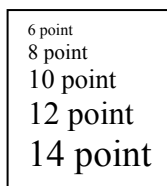


Figure 3: Illustration of clarity of different print sizes

24. Where it is necessary to consider which essential information in paragraph 18 to give in print size of 10 point and 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 the 10 point print size and as much of the other information as is possible.

25. A minimum of 6 point print size should be used for any text for information on the label other than that in paragraph 18.

26. Note that different fonts can give rise to different character heights. This Guidance is based on an 8 point font size having the lower case letter 'o' with a height of 1.6 mm.

27. Whatever the size of the text the clarity of the label will be enhanced by following the advice on the other factors below.

28. Where packs are physically too small, or of a shape which cannot easily support the minimum print size, it is especially important to consider a range of factors including:

- ensuring that non-essential information does not take up unnecessary space,
- the number of languages used,
- the type colour and font, and
- the layout of the label.

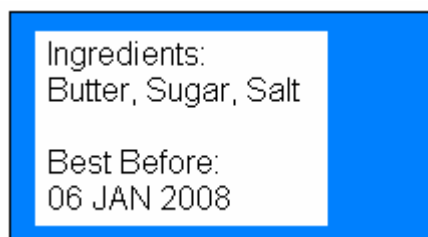
29. Use simple fonts with limited serif at most.

30. It is important to ensure that numbers are distinct. Numbers can easily be misread in certain typefaces (particularly 6, 8 and 9 in Arial).

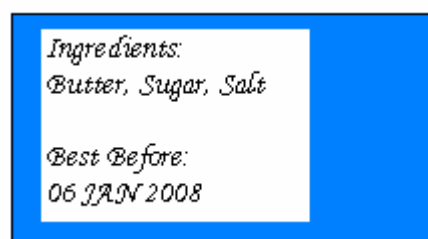
Note: This table contains additional advice on practices that are either recommended, to be used with care or avoided – see diagram on p11 for illustrations.

	Best Practice Advice		
	Recommended	To be Used With Care	Best Avoided
31. Fonts and format (See Figure 4 opposite)		Ornate fonts Shadowing Bold type Uppercase letters Underlining Italics Hyphenation Justified text Coloured text / backgrounds	
32. Contrast (See Figure 5 opposite)	Black type on a white background or good tonal contrast of at least 70%	Light type on a dark background. Where packaging is transparent, good contrast is necessary with food product forming the visible background	Dark type on a dark background
33. Backgrounds (See Figure 5 opposite)		Watermarking or non-solid background (e.g. dot filled background) where text appears	
34. Colours			Green/red combinations
35. Layout	Range left text	Text wrapping	
36. Surfaces	Matt finish printing surface	Metallic and shiny surfaces	Rough surfaces
37. Print quality		For print systems that may give rise to lower print quality, care may be needed to produce good sharpness and resolution of text and alignment and registration of colour.	Printers' Quality Assurance Standards are important to avoid ink problems e.g. colour accuracy, bleed and poor adhesion. Ink jetting date marks on production lines and rough surfaces may present issues that also require Quality Assurance.

Figure 4: Use of fonts

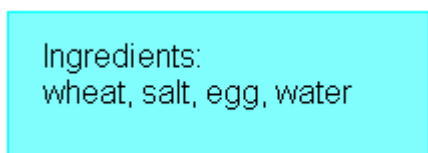


(i) Fonts such as Arial promote clarity of letters and therefore could helpfully be used on labels.

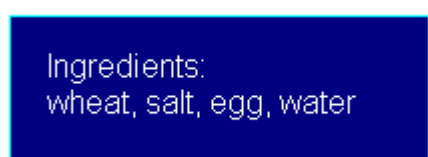


(ii) Ornate fonts such as Monotype Corsiva compromise clarity and are best avoided.

Figure 5: Contrast between text and background



(i) Dark text on a light background promotes clarity and is best used wherever possible.



(ii) White text on a dark background can be effective but is best avoided for font sizes of less than 12 point.



(iii) The use of red and green together compromises clarity and should be avoided.



(iv) Busy images and watermarks behind text can compromise clarity and are best avoided.

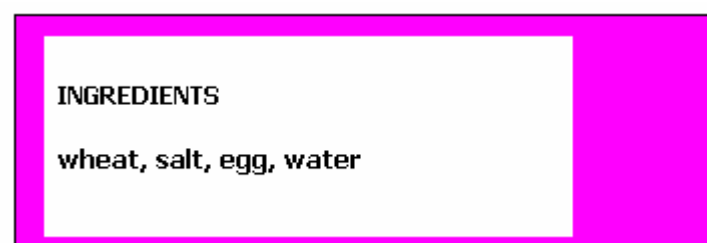
PRIORITISATION, LAYOUT AND CONSISTENCY

38. Ensure that all information is assembled before beginning label design work to avoid compromising clarity by late changes.

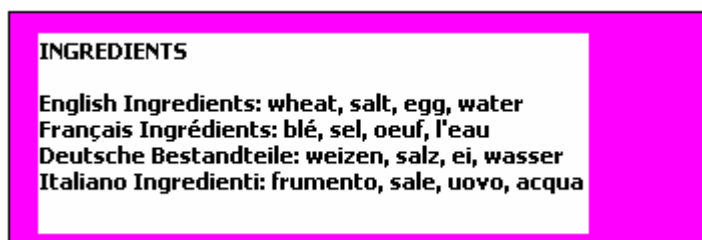
39. Consider permissible formats for mandatory features. It would be helpful to specify a hierarchical-list of label features to enable a layout where both legally required and important voluntary items are given top priority for clarity.

40. Where possible use only one or a minimum number of languages.

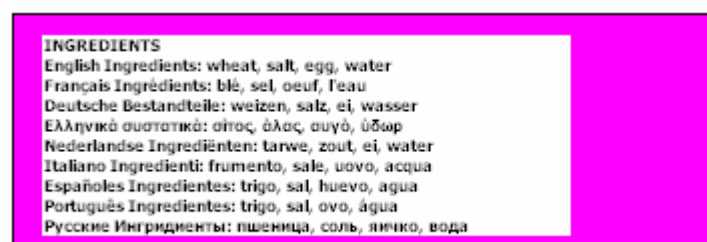
Figure 6: Use of minimum number of languages



(i) Using only one language on labels is the ideal situation so far as legibility is concerned.



(ii) Avoiding unnecessary languages allows for the font size to be increased, promoting legibility.



(iii) Including large numbers of languages on labels compromises legibility as font must be reduced due to restricted printable area.

41. Simple, consistent and easily recognisable icons/symbols can help direct consumers to information. This can be particularly useful for cooking instructions (for example, pictures of a frying pan, oven and microwave).

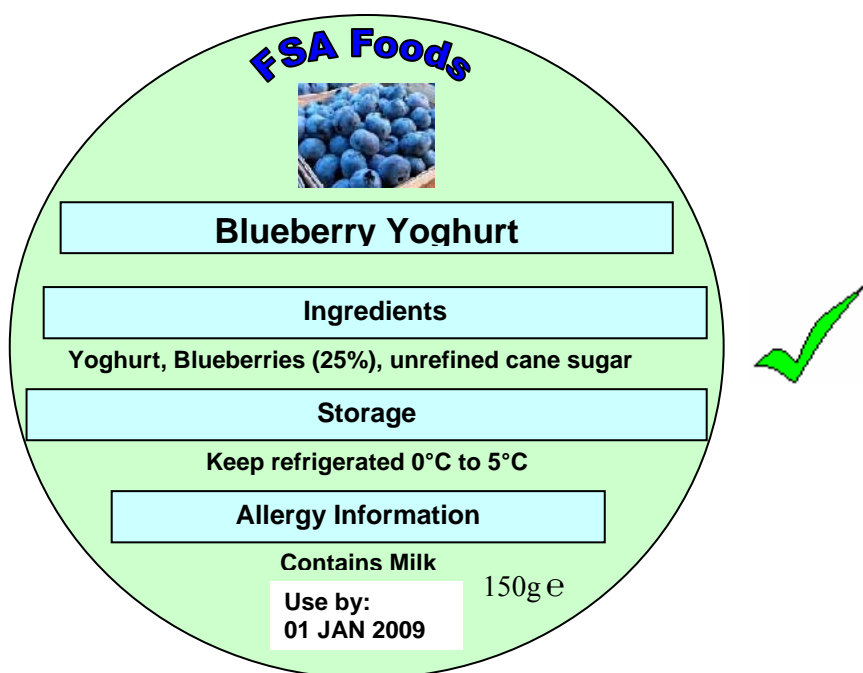
42. Consistency of layout within product ranges makes it easier for consumers to locate information. In particular, consistent box shapes or layouts for information panels are helpful.

INCREASING THE PRINTABLE AREA ON PACK

43. It is important to give the essential information described in the recommendation at paragraph 18 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.

Figure 7: Good use of small area on yoghurt pot lid

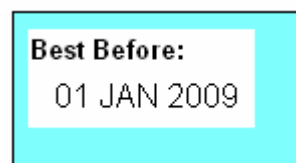


FORMAT OF DATE MARKING

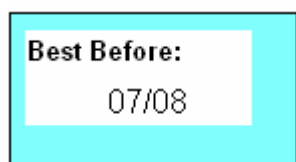
44. Where possible, express the “best before” or “use by” date as day/month/year. If day/month or month/year combinations are permitted and are used, spell out the month in words (either in full or as an abbreviation – e.g. Jan, Mar, Aug, Dec) rather than numbers in order to avoid confusion⁵.

⁵ For relevant legislation on indication of food durability see Reference 3 in Annex 1 (“Clear Food Labelling: Relevant Legislation”).

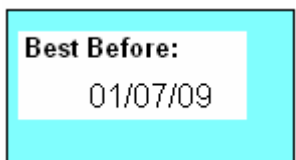
Figure 8: Clear format of date marking



(i) This date format is clear and the only interpretation is the 1st January 2009 and therefore should be used on labels.



(ii) This date format could be read as the 7th August OR the 8th July OR July 2008 and therefore should be avoided.



(iii) This date format could potentially be read as the 1st July 2009 OR the 7th January 2009 and therefore should be avoided.

ALLERGEN INFORMATION

45. Labelling legislation currently requires 12 potentially allergenic foods, and the products derived from them, to always be labelled on pre-packed foods including alcoholic drinks. Two additional foods will require labelling at the end of 2007, bringing the total to 14. The list⁶ of 14 foods, provided in Annex 1 ("Clear Food Labelling: Relevant Legislation"), is subject to change based on advice from the European Food Safety Authority.

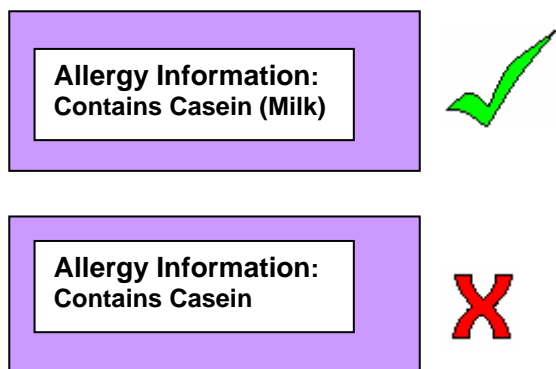
46. There are exceptions to these labelling requirements for some derived ingredients which no longer contain the allergenic protein⁷.

47. When labelling allergens, use simple language, using the names on the list referred to above, for example, if "casein" is used then this should appear as "casein (milk)". When describing a cereal containing gluten use the name of the cereal and do not list gluten as an ingredient.

⁶ For relevant legislation on requirements on indications of allergens see Reference 2 (Section 2.2 (c)) in Annex 1 ("Clear Food Labelling: Relevant Legislation").

⁷ For relevant legislation on requirements on indications of allergens see Reference 2 (Section 2.2 (c)) in Annex 1 ("Clear Food Labelling: Relevant Legislation").

Figure 9: Use of simple language for names of allergens



48. The voluntary use of devices that draw attention to allergens to make product selection easier for consumers with food allergies or intolerances and their carers can be helpful, and adopting a consistent approach to this is always of value.

49. If a decision to use a separate allergy information/alert panel is taken, best practice dictates that all of the specified allergens present in the food should be included and that the panel be in the same field of vision as the ingredient list. Where a separate allergy information alert panel is used, consumers should be referred to the ingredient list for more detailed information about the composition of the product and the presence of particular allergens.

50. The Agency has issued in 2006 “Best Practice Guidance on Managing Food Allergens with Particular Reference to Avoiding Cross-contamination and Using Appropriate Advisory Labelling (e.g. May Contain Labelling)”⁸.

FORMAT OF NUTRITION LABELLING

51. Although the law only requires nutrition information when a nutrition claim⁹ is made, it is recommended that Group 2 nutrition labelling is given on all pre-packed foods on a voluntary basis, as it is of increasing interest to consumers. Group 2 nutrition labelling means energy value, amounts of protein, carbohydrate, sugars, fats, saturates, fibre and sodium. It is recommended that the amount of salt is also provided.

⁸ <http://www.food.gov.uk/multimedia/pdfs/maycontainguide.pdf>

⁹ For relevant legislation on nutrition labelling requirements and nutrition and health claims see Reference 2 (Section 2.4) and Reference 4 (Section 4.1) respectively in Annex 1 (“Clear Food Labelling: Relevant Legislation”).

Figure 10: Nutrition panel with Group 2 labelling

Nutrition information	
Typical values per 100g	
Energy	245 kJ/58kcal
Protein	4.6g
Carbohydrate	7.2g
of which sugars	6.5g
Fat	1.2g
of which saturates	0.2g
Fibre	0.2g
Sodium	0.1g

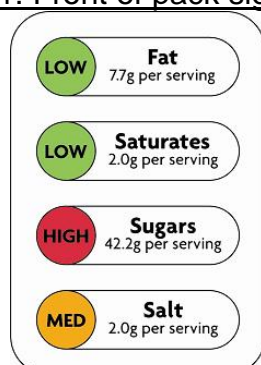


52. Some consumers find the format prescribed in law for both voluntary and compulsory labelling difficult to use. The Institute of Grocery Distribution (IGD) has issued advice on ways of improving the presentation on back of pack nutrition information within the current rules. It is recommended that this IGD advice on nutrition labelling should be followed¹⁰.

53. Front of pack nutrition signposting is voluntary. The Agency recommends that any schemes should be based on the following four core principles:

- provides separate information on fat, saturated fat, sugars and salt;
- uses red, amber or green colour coding to indicate whether levels of these nutrients are high, medium or low - providing at a glance information;
- uses nutritional criteria developed by the Agency to determine the colour code; and
- gives information on the levels of nutrient per portion of product.

Figure 11: Front of pack signpost labelling



¹⁰ IGD Voluntary Nutrition Labelling Guidelines to Benefit the Consumer, Supplementary to legislative nutrition labelling requirements, February 1998, ISBN 1 898044 36 8.

CONTACT DETAILS FOR FURTHER INFORMATION

54. The address for all correspondence relating to the issues set out in this advice is:

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FOOD LABELLING
CLEAR FOOD LABELLING
RELEVANT LEGISLATION

This Annex sets out legal requirements that relate to clear labelling. It is not an exhaustive list of legal requirements and it is advisable to always check the legislation itself. The information is given for guidance purposes rather than being the best source of the legislation. It is structured around key issues according to the references in the Best Practice Advice section of the Clear Food Labelling Guidance document (pages 6-17):

Reference 1 Intelligibility and Field of Vision

- 1.1 Intelligibility
- 1.2 Grouping indications

Reference 2 Essential Information

- 2.1 General requirements
- 2.2 Specific indications
 - (a) Declaration of sweeteners
 - (b) Caffeine
 - (c) Allergens
 - (d) GZA indication
 - (e) Irradiated foods
 - (f) Milk
- 2.3. Alcoholic strength
- 2.4 Nutritional Labelling
- 2.5 Origin Labelling
- 2.6 QUID requirements
- 2.7 Declaration of genetically modified (GM) ingredients
- 2.8 Requirements relating to packaging
- 2.9 Lot marking

Reference 3 Food Durability

- 3.1 Form of indication of minimum durability
- 3.2 Form of indication of “use by”-date
- 3.3 Foods that need not bear an appropriate durability date

Reference 4 Claims

- 4.1 Health and Nutrition Claims

Note: All references to legislation are to the instrument as amended when the Guidance was published.

REFERENCE 1 – INTELLIGIBILITY AND FIELD OF VISION

1.1 INTELLIGIBILITY

The Food Labelling Regulations 1996

Regulation 38

“(1) The particulars with which a food is required to be marked or labelled by these Regulations, or which appear on a menu, notice, ticket or label pursuant to these Regulations, shall be easy to understand, clearly legible and indelible and, when a food is sold to the ultimate consumer, the said particulars shall be marked in a conspicuous place in such a way as to be easily visible.
(2) Such particulars shall not in any way be hidden, obscured or interrupted by any other written or pictorial matter.
(3) Paragraph (1) of this regulation shall not be taken to preclude the giving of such particulars at a catering establishment, in respect of foods the variety and type of which are changed regularly, by means of temporary media (including the use of chalk on a blackboard).”

1.2 GROUPING OF INDICATIONS

The Food Labelling Regulations 1996

Regulation 39:

“(1) Where a food is required to be marked or labelled with more than one of the following indications, such indications shall appear in the labelling of the food in the same field of vision:

- (a) the name of the food,
- (b) an appropriate durability indication,
- (c) an indication of alcoholic strength by volume,
- (d) the cautionary words in respect of raw milk,
- (e) the warning required on certain products by regulation 32,
- and
- (f) an indication of the net quantity as required by the Weights and Measures Act 1985 or by any Order or Regulations made thereunder.

(2) Paragraph (1) (b), (c) and (f) of this regulation shall not apply to any food sold in a bottle or packaging where such bottle or packaging is the subject of regulation 26.”

Notes: (1) This Regulation is relevant to paragraphs 21-24 of the Clear Labelling Guidance which concern field of vision and best practice on the grouping of information.

(2) The Weights and Measures (Packaged Goods) Regulations 2006 – Guidance Notes recommend that net quantity markings are placed on the front, or possibly the top of the container to ensure the markings are visible in normal conditions of presentation. If followed, this would result in all the indications (a) to (f) being placed together on the front or top.

Regulation 19 (QUID):

“(3) The indication of quantity of an ingredient or category of ingredients required by paragraph (1) of this regulation shall -

(b) appear

- (i) in or next to the name of the food, or
- (ii) in the list of ingredients in connection with the ingredient or category of ingredients in question.”

REFERENCE 2 – ESSENTIAL INFORMATION
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2.1 GENERAL REQUIREMENTS

(a) Net weight/volume (DTI)

Weights and Measures Act 1985

The Act creates a regime that requires most prepacked food to carry an indication of its net weight or volume on the container.

It provides for type size requirements for indications of weight and volume and “average” system of quantity control for prepacked goods, indicated next to weight declaration with “e” symbol.

(b) Basic requirements for labelling for prepacked foods

The Food Labelling Regulations 1996

Regulation 5:

“Subject to the following provisions of this Part of these Regulations, all food to which this Part of these Regulations applies shall be marked or labelled with-

- (a) the name of the food;
- (b) a list of ingredients;
- (c) the quantity of certain ingredients or categories of ingredients
- (d) the appropriate durability indication;
- (e) any special storage conditions or conditions of use;
- (f) the name or business name and an address or registered office of either or both of:-

- (i) the manufacturer or packer, or
- (ii) a seller established within the European Community;
- (g) particulars of the place of origin or provenance of the food if failure to give such particulars might mislead a purchaser to a material degree as to the true origin or provenance of the food; and
- (h) instructions for use if it would be difficult to make appropriate use of the food in the absence of such instructions."

NB: in paragraphs 22 and 23 of the Guidance, there is reference to the customer care line information or other information identifying the manufacturer / packer / seller. Regulation 5(e) makes it a legal requirement to provide the name and address of manufacturer / packer / seller; also giving a phone number / customer care line / email or web site would be optional and best practice advice.

2.2 SPECIFIC INDICATORS

(a) Declaration of Sweeteners

The Food Labelling Regulations 1996

Regulation 34 Foods containing sweeteners, added sugar and sweeteners, aspartame or polyols

"(1) A food containing a sweetener or sweeteners authorised pursuant to the Sweeteners in Food Regulations 1995 shall be marked or labelled with the indication "with sweetener(s)".

(2) A food containing both an added sugar or sugars and a sweetener or sweeteners authorised pursuant to those Regulations shall be marked or labelled with the indication "with sugar(s) and sweetener(s)".

(3) A food containing aspartame shall be marked or labelled with the indication "contains a source of phenylalanine".

(4) A food containing more than 10% added polyols shall be marked or labelled with the indication "excessive consumption may produce laxative effects".

(5) The indications required by paragraphs (1) and (2) above shall accompany the name of the food."

(b) Caffeine

The Food Labelling Regulations 1996

Regulation 34A Drinks with high caffeine content

“(1) Subject to paragraph (2) of this regulation, in the case of a drink which -

(a) is intended for consumption without modification and contains caffeine, from whatever source, in a proportion in excess of 150 milligrams per litre, or

(b) is in concentrated or dried form and after reconstitution contains caffeine, from whatever source, in a proportion in excess of 150 milligrams per litre, that drink shall be marked or labelled with the words "High caffeine content" in the same field of vision as the name of the drink, and those words shall be followed by a reference in brackets to the caffeine content expressed in milligrams per 100 millilitres.

(2) Paragraph (1) of this regulation shall not apply to any drink based on coffee, tea or coffee or tea extract where the name of the food includes the term "coffee" or "tea".

(c) Allergens

(i) Requirements for listing specified allergens

Labelling legislation currently requires 12 (soon to be 14) foods, and the products derived from them, to always be labelled on pre-packed foods. This list is subject to change based on advice from the European Food Safety Authority, but the list currently consists of those items listed in Schedule AA1.

The Food Labelling Regulations 1996

Regulation 34B Foods containing allergenic ingredients or ingredients originating from allergenic ingredients

“(1) Subject to paragraph (2) and [3] of this regulation, where any food containing any allergenic ingredient, or any ingredient originating from an allergenic ingredient referred to in paragraphs 1 to 11 of **Schedule AA1**, does not specify the allergenic ingredient in the name of the food, that food shall be marked or labelled with a clear reference to the name of the allergenic ingredient concerned.

(2) In the case of any drink which has an alcoholic strength by volume of more than 1.2 per cent -

(a) the presence of any allergenic ingredient shall be indicated by marking or labelling the drink with the word "contains" followed by the name of the allergenic ingredient; and

(b) the presence of any ingredient originating from an allergenic ingredient referred to in paragraphs 1 to 11 of Schedule AA1 shall be indicated by marking or labelling the drink with the word "contains" followed by the name of the ingredient including a reference to the allergenic ingredient from which it originates, unless the name of the allergenic ingredient is specified in the name of the drink or in the list of ingredients, if any."

(3) [Not relevant for these purposes]

Schedule AA1:

- "Cereals containing gluten, these are wheat, rye, barley, oats, spelt and kamut
- lupin*
- crustaceans, such as crabs, lobsters and prawns
- molluscs, such as oyster, squid, cockles, mussel, periwinkle and snail*
- eggs
- fish
- peanuts (also called groundnuts)
- soybeans (sometimes called soya)
- milk
- nuts (almonds, hazelnuts, walnuts, Brazil nuts, cashew nuts, pecan nuts, pistachio nuts, macadamia nuts and Queensland nuts)
- celery (including celeriac)
- mustard
- celery
- sesame seeds
- sulphur dioxide and sulphites at concentrations of more than 10mg/kg or 10 mg/litre expressed as SO₂ "

*These two come into effect at the end of 2007.

(ii) Exemptions to allergen labelling for non-allergenic derived ingredients

Commission Directive 2005/26/EC as corrected by Commission Directive 2005/63/EC, establishes a list of food ingredients or substances provisionally excluded from labelling¹¹. This expires on 25 November 2007. EFSA is

¹¹ For more information on allergen labelling requirements see Guidance Notes on the Food Labelling (Amendment) (No. 2) Regulations 2004 and Guidance Notes on the Food Labelling (Amendment) (No. 2) Regulations 2005 (as amended).

<http://www.food.gov.uk/foodindustry/guidancenotes/#branch3>

currently considering dossiers in support of making these temporary exemptions permanent. [DN However we are unlikely to know before October 2007 which of these cases has been successful.]

The Food Labelling Regulations 1996

Schedule 2A:

Schedule 2A sets out the temporary list of certain ingredients exempted from allergen labelling rules in case of ingredients derived from specified allergens in Schedule AA1 that are no longer allergenic. Refer to Food Labelling (Amendment) (No 2) Regulations 2005, SI 2005/2057.

(d) GZA indication

The Food Labelling Regulations 1996

Regulation 34C Confectionery and drinks containing glycyrrhizinic acid or its ammonium salt

“(1) This regulation applies to any confectionery or drink which contains glycyrrhizinic acid or its ammonium salt as a result of the addition of that acid or salt as such or of the liquorice plant *Glycyrrhiza glabra*, and references in this regulation to "relevant concentration" are to the concentration of that acid or salt in the food -

- (a) manufactured as ready for consumption or,
- (b) if it is not so manufactured, as reconstituted according to its manufacturer's instructions.

(2) In the case of -

- (a) any confectionery which contains a relevant concentration of at least 100mg/kg but less than 4 g/kg,
- (b) any drink which contains more than 1.2 per cent by volume of alcohol and a relevant concentration of at least 10 mg/l but less than 300 mg/l, and
- (c) any drink which does not contain more than 1.2 per cent by volume of alcohol and which contains a relevant concentration of at least 10 mg/l but less than 50 mg/l, that food shall be marked or labelled with the indication "contains liquorice", unless the term "liquorice" appears in the list of ingredients or in the name of the food.

(3) In the case of -

(a) any confectionery which contains a relevant concentration of at least 4g/kg,

(b) any drink which contains more than 1.2 per cent by volume of alcohol and a relevant concentration of at least 300 mg/l, and

(c) any drink which does not contain more than 1.2 per cent by volume of alcohol and which contains a relevant concentration of at least 50 mg/l, that food shall be marked or labelled with the indication "contains liquorice - people suffering from hypertension should avoid excessive consumption".

(4) The indications required by paragraphs (2) and (3) of this regulation shall appear immediately after the list of ingredients or, in the absence of such a list, near the name of the food."

(e) Irradiated Food

(i) Irradiated Ingredients

The Food Labelling Regulations 1996

Regulation 25 applies where Regulation 23 exempts certain foods from most labelling requirements.

Regulation 25 Indication of Irradiated Ingredients

"(1) Subject to paragraph (2) of this regulation, any food which—

(a) by virtue of regulation 23 alone is exempted from the requirement to be marked or labelled with a list of ingredients, and

(b) contains any ingredient which has been irradiated (and which comprises a particular with which, had that food not been subject to that exemption, the food would have been required by these Regulations to be marked or labelled), shall be marked or labelled with an indication that it contains that ingredient, and in such a case the reference within that indication to that ingredient shall include or be accompanied by the word "irradiated" or the words "treated with ionising radiation".

(2) This regulation does not apply to food which is not exposed for sale."

(ii) Irradiated food (nonprepacked, prepacked for direct sale): catering establishments

Regulation 27 Certain food sold at catering establishments

“(1) Subject to the following paragraphs of this regulation, any food which is sold at a catering establishment and is either:-

- (a) not prepacked, or
- (b) prepacked for direct sale,

need not be marked or labelled with any of the particulars specified in regulation 5 nor, where but for this regulation they would otherwise be required, with any of the particulars specified in regulations 32, 33 and 34, 34B and 34C.

(2) In the case of any such food being milk which is prepacked for direct sale it shall be marked or labelled with the particulars required by regulations 5(f) (where the appropriate circumstances described in that regulation apply) and, if such milk is raw milk, the particulars required by regulation 5(e)(i).

(3) In the case of any such food which has been irradiated that food shall be marked or labelled with an indication of such treatment, which indication shall include or be accompanied by the word "irradiated" or the words "treated with ionising radiation".

(4) In the case of any such food which contains an ingredient which has been irradiated (and which comprises a particular with which, had that food been prepacked, the food would have been required by these Regulations to be marked or labelled), that food shall (subject to regulation 36(3) and (4)) be marked or labelled with an indication that it contains that ingredient and the reference within that indication to that ingredient shall include or be accompanied by the word "irradiated" or the words "treated with ionising radiation".

(f) Milk

The Food Labelling Regulations 1996

(i) Raw Milk

Regulation 31 Raw Milk

“(1) Subject to paragraph (3) of this regulation, and except in cases to which paragraph (2) of this regulation applies, the container in which any raw milk is sold shall be marked or labelled with the

words "This milk has not been heat-treated and may therefore contain organisms harmful to health".

(2) Subject to paragraph (3) of this regulation, in the case of any raw milk which is not prepacked and is sold at a catering establishment there shall appear:-

- (a) on a label attached to the container in which that milk is sold, or
- (b) on a ticket or notice that is readily discernible by an intending purchaser at the place where he chooses that milk, the words "Milk supplied in this establishment has not been heat-treated and may therefore contain organisms harmful to health".

(3) The provisions of paragraphs (1) and (2) of this regulation shall not apply to raw milk from buffaloes."

(ii) Skimmed milk and non-milk fat

Regulation 32 Products consisting of skimmed milk together with non-milk fat

"The container in which any product:-

- (a) consisting of skimmed milk together with non-milk fat,
- (b) which is capable of being used as a substitute for milk, and
- (c) which is neither:-
 - (i) an infant formula or a follow-on formula, nor
 - (ii) a product specially formulated for infants or young children for medical purposes,is sold shall be prominently marked or labelled with a warning that the product is unfit, or not to be used, as food for babies."

2.3. ALCOHOLIC STRENGTH

The Food Labelling Regulations 1996

Regulation 30 Prepacked alcoholic drinks other than Community controlled wine

"(1) In the case of prepacked alcoholic drinks other than Community controlled wine, every drink with an alcoholic strength by volume of more than 1.2 per cent shall be marked or labelled with an indication of its alcoholic strength by volume in the form of a figure to not more than one decimal place (which may be preceded by the word "alcohol" or by the abbreviation "alc") followed by the symbol "% vol".

(2) Positive and negative tolerances shall be permitted in respect of

the indication of alcoholic strength by volume and shall be those specified in Schedule 5, expressed in absolute values.

(3) For the purposes of this regulation, the alcoholic strength of any drink shall be determined at 20°C.”

Note: Refer to Schedule 5 in the regulations for the specified tolerance levels.

2.4 NUTRITION LABELLING

The Food Labelling Regulations 1996

Regulation 40 Claims

“(1) A claim of the type described in Part I of Schedule 6 shall not be made, either expressly or by implication, in the labelling or advertising of a food.

(2) A claim of a type described in Part II of Schedule 6 shall not be made, either expressly or by implication, in the labelling or advertising of a food, except in accordance with the appropriate conditions set out in that Part of that Schedule.

(3) Where a claim is a claim of two or more of the types described in Part II of Schedule 6, the conditions appropriate to each of the relevant types of claim shall be observed.”

Regulation 41 Supplementary provisions relating to claims

“(1) Nothing in regulation 40 or Schedule 6 shall be taken to prevent the dissemination of useful information or recommendations intended exclusively for persons having qualifications in dentistry, medicine, nutrition, dietetics or pharmacy.

(2) A reference to a substance in a list of ingredients or in any nutrition labelling shall not of itself constitute a claim of a type described in Schedule 6.

(3) In Schedule 6 any condition that a food in respect of which a claim is made shall be marked or labelled with the prescribed nutrition labelling shall not apply in the case of:-

(a) a food (other than a food sold from a vending machine) which is not prepacked and which is sold to the ultimate consumer at a catering establishment, or

(b) a claim contained within generic advertising, but in respect of a food described in sub-paragraph (a) there may be given such of the

elements of the prescribed nutrition labelling which, but for this paragraph, would have been required or permitted to be given, as it is wished to include, and where all or any such elements are given this shall be in accordance with Part I of Schedule 7, except that in applying paragraph 4 of that Part, in place of paragraphs (a)(i) and (ii) to that paragraph there shall be read references to:-

- (i) an unquantified serving of the food, and
- (ii) any one portion of the food.

(4) Where nutrition labelling not being prescribed nutrition labelling is given it shall be given in all respects as if it were prescribed nutrition labelling except that in applying in this context the requirements for prescribed nutrition labelling described in Schedule 7, Part II of that Schedule shall be read as if paragraph 1(d), and the proviso to paragraph 1(a), were omitted.”

Note: See Schedule 6 for Claims and Schedule 7 of the Food Labelling Regulations 1996 for the specific provisions.

Regulation (EC) 1924/2006 on nutrition and health claims made on foods

Article 1

“In the case of non-prepackaged foodstuffs (including fresh products such as fruit, vegetables or bread) put up for sale to the final consumer or to mass caterers and foodstuffs packed at the point of sale at the request of the purchaser or pre-packaged with a view to immediate sale, Article 7 and Article 10(2)(a) and (b) shall not apply. National provisions may apply until the eventual adoption of Community measures in accordance with the procedure referred to in Article 25(2).”

Article 7

Nutrition information

“The obligation and the modalities for providing information pursuant to Directive 90/496/EEC where a nutrition claim is made shall apply mutatis mutandis where a health claim is made, with the exception of generic advertising. However, the information to be provided shall consist of information in Group 2 as defined in Article 4(1) of Directive 90/496/EEC.

In addition and as the case may be, the amount(s) of the substance(s) to which a nutrition or health claim relates that does not appear in the nutrition labelling shall also be stated in the same field of vision as the nutrition information and be expressed in accordance with Article 6 of Directive 90/496/EEC.

In the case of food supplements, the nutrition information shall be provided in accordance with Article 8 of Directive 2002/46/EC.”

2.5 ORIGIN LABELLING

The Food Labelling Regulations 1996

Regulation 5: “

Subject to the following provisions of this Part of these Regulations, all food to which this Part of these Regulations applies shall be marked or labelled with:-

(f) particulars of the place of origin or provenance of the food if failure to give such particulars might mislead a purchaser to a material degree as to the true origin or provenance of the food; and”

2.6 QUID (QUANTITATIVE INGREDIENT DECLARATION) REQUIREMENTS

The Food Labelling Regulations 1996

Regulation 19:

“The quantity of an ingredient or category of ingredients used in the preparation of a food shall be indicated where –

(a) that ingredient or category of ingredients appears in the name of the food or is usually associated with that name by the consumer;

(b) that ingredient or category of ingredients is emphasised on the labelling in words, pictures or graphics; or

(c) that ingredient or category of ingredients is essential to characterise a food to distinguish it from products with which it might be confused because of its name or appearance.”

2.7 DECLARATION OF GENETICALLY MODIFIED (GM) INGREDIENTS

Regulation (EC) 1829/2003 (GM Food and Feed Regulation) Regulation (EC) 1830/2003 (traceability and labelling of genetically modified organisms)

The Traceability and Labelling of GMOs Regulation creates a regime for tracing and identifying GMOs and food and feed

products derived from GMOs at all stages of their placing on the market.

The GM Food and Feed Regulation requires labelling for all food and feed products derived from GM sources regardless of the presence of detectable novel genetic material in the final product or of the quantity of intentionally used GM ingredient present.

All food and feed that contains, consists of or is produced from genetically modified organisms (GMOs) must be labelled as such. Any food product sold by retailers to the final consumer in the UK, which is derived from a GMO, must be clearly labelled. For example, bread containing ingredients derived from GM soya has to indicate “this product contains genetically modified organisms” or “produced from genetically modified soya” on the label.

2.8 REQUIREMENTS RELATING TO PACKAGING

(a) Foods packaged in certain gases

The Food Labelling Regulations 1996

Regulation 33 Foods packaged in certain gases

“A food the durability of which has been extended by means of its being packaged in any packaging gas authorised pursuant to Council Directive 89/107/EEC, concerning food additives for use in foodstuffs intended for human consumption, shall be marked or labelled with the indication “packaged in a protective atmosphere”. ”

(b) Small Packages and certain bottles

The Food Labelling Regulations 1996

Regulation 26 Small packages and certain indelibly marked bottles

“(1) Subject to the following paragraphs of this regulation, any prepacked food, either contained in an indelibly marked glass bottle intended for re-use and having no label, ring or collar, or the largest surface of whose packaging has an area of less than ten square centimetres, need not–

- (a) by virtue of these Regulations be marked or labelled with
 - (i) any of the particulars specified in regulation 5 except the name of the food and, unless the food is not required to be marked or labelled with such an indication, the appropriate durability indication; or

(ii) any of the particulars specified in regulations 33, 34 and 34C where but for this regulation they would otherwise be required, or
(b) be marked or labelled with the GMO particulars, where but for this regulation they would otherwise be required.

(2) Any bottle referred to in paragraph (1) of this regulation which contains milk shall also be marked or labelled with the particulars required by regulation 5(f) (where the appropriate circumstances described in that regulation apply) and, if such milk is raw milk, with the particulars required by regulation 5(e)(i).

(3) Subject to paragraphs (4) and (5) of this regulation, any prepacked food which:-

(a) is sold or supplied as an individual portion, and

(b) is intended as a minor accompaniment to either:-

(i) another food, or

(ii) another service,

need not be marked or labelled with any of the particulars specified in regulation 5 except the name of the food nor, where but for this regulation they would otherwise be required, with any of the particulars mentioned in paragraph (3A) of this regulation. Such prepacked food shall include butter and other fat spreads, milk, cream and cheeses, jams and marmalades, mustards, sauces, tea, coffee and sugar, and such other service shall include the provision of sleeping accommodation at an hotel or other establishment at which such accommodation is provided by way of trade or business.

(3A) The other particulars for the purposes of paragraph (3) of this regulation are those specified in regulation 32 and, in the case of any food to which paragraph (1) of this regulation applies, the particulars specified in regulations 33, 34 and 34C.

(4) This regulation does not apply to any food to which regulation 23 or 27 applies.

(5) Any bottle referred to in paragraph (1) of this regulation need not:-

(a) where it contains milk, or

(b) where it contains any other food, in which case until 1st January 1997,

be marked or labelled with an appropriate durability indication.”

Note: The effect of only referring to regulations 32, 33 and 34 is that allergens and caffeine must be labelled on small packages. They are not specifically excluded so they still apply.

2.9 LOT MARKING

Food (Lot Marking) Regulations 1996

Most prepacked foods are required to carry a lot mark for the purpose of tracing and identifying products along the relevant section of the food chain. However, businesses may choose to use a best before/use by date as a lot mark (whether or not the Food Labelling Regulations 1996 require the product to carry a date mark).

See above for field of vision requirements relating to durability indications.

REFERENCE 3 – FOOD DURABILITY

(Please see also the Agency's Guidance Notes on 'Use by dates' on www.food.gov.uk for further information.)

See below for applicable regulations in the Food Labelling Regulations 1996 regarding the appropriate durability indication.

3.1 FORM OF INDICATION OF MINIMUM DURABILITY

The Food Labelling Regulations 1996 (as amended)

Regulation 20 Form of indication of minimum durability

“(1) Subject to the following paragraphs of this regulation, the minimum durability of a food shall be indicated by the words "best before" followed by:-

- (a) the date up to and including which the food can reasonably be expected to retain its specific properties if properly stored, and
- (b) any storage conditions which need to be observed if the food is to retain its specific properties until that date.

(2) The date in the indication of minimum durability shall be expressed in terms of a day, month and year (in that order), except that:-

- (a) in the case of a food which can reasonably be expected to retain its specific properties for three months or less, it may be expressed in terms of a day and month only;
- (b) in the case of a food which can reasonably be expected to retain its specific properties for more than three months but not more than 18 months it may be expressed in terms of a month and year only, if the words "best before" are replaced by the words "best before end", and
- (c) in the case of a food which can reasonably be expected to retain its specific properties for more than 18 months it

may be expressed either in terms of a month and year only or in terms of a year only, if (in either case) the words "best before" are replaced by the words "best before end".

(3) Either:-

(a) the date up to and including which a food can reasonably be expected to retain its specific properties if properly stored, or

(b) that date and any storage conditions which need to be observed if the food is to retain its specific properties until that date,

may appear on the labelling of a food separately from the words "best before" or "best before end", as the case may be, provided that those words are followed by a reference to the place where the date (or the date and the storage conditions) appears (or appear)."

3.2 FORM OF INDICATION OF "USE BY" DATE

Regulation 21 Form of indication of "use by" date

"(1) Where a "use by" date is required in respect of a food it shall be indicated by the words "use by" followed by:-

(a) the date up to and including which the food, if properly stored, is recommended for use, and

(b) any storage conditions which need to be observed.

(2) The "use by" date shall be expressed in terms either of a day and month (in that order) or of a day, a month and a year (in that order).

(3) Either:-

(a) the date up to and including which a food required to bear a "use by" date is recommended for use, or

(b) that date and any storage conditions which need to be observed, may appear separately from the words "use by", provided that those words are followed by a reference to the place where the date (or the date and the storage conditions) appears (or appear)."

3.3 FOODS WHICH NEED NOT BEAR AN APPROPRIATE DURABILITY INDICATION

Regulation 22 Foods which need not bear an appropriate durability indication

Some foods are specifically exempt from the requirement to carry a date mark. These are listed in regulation 22. Some are exempt from the requirement because they are exempt generally from the labelling provisions of Part II of the regulations (see regulation 4). The labelling of such foods is generally governed by separate legislation (eg on honey, coffee and chocolate) which does not require a date mark to be given. Other foods are also exempt from carrying a date mark because of the conditions in which they are sold.

REFERENCE 4 - CLAIMS

4.1 HEALTH AND NUTRITION CLAIMS

Regulation (EC) 1924/2006 on nutrition and health claims made on foods

(See above on p 30 for excerpt of text of EC Regulation).

From 1 July 2007, the use of nutrition and health claims on food and food supplements are harmonised across the European Community (EC).

The regulation will require claims to be on an automated list to be used on food. It also requires products to meet certain criteria in order to make more claims.

The list of permitted **nutrition claims** is accessible via the European Commission's website. "Low fat", for example, appears on the list, so it will be possible to continue to use this claim and any claim which has the same meaning. However, if used, the product must fit the given criteria – i.e. 3g of fat per 100g or 1.5g per 100ml. It will not be possible to describe the product as "X% fat-free".

If a nutrition claim does not appear on the list, it may be possible to use it until 2010, but the Agency Guidance should be consulted for further information.

If a company wishes to make a **health claim** – e.g. "Omega 3 benefits the heart", it should have been submitted it to the Agency, together with references to the science it is based on, by **21 September 2007**. This is to allow it to be considered for inclusion in the UK's list of "generally accepted" permitted health claims.

For a period of three years, it will be possible to continue to use health claims within the scope of the national list – whether on the list or not – under existing national rules.

The new rules require certain claims to be supported by a full scientific dossier, rather than put on the UK's list. It will be possible to use disease risk reduction claims or claims about children's development and health after they are authorised and placed on the Community Register.

If a claim is made, it will be necessary to provide **nutrition labelling**.

Transitional measures will defer many provisions until a later date.

CONTACT DETAILS FOR FURTHER INFORMATION

The address for all correspondence relating to the issues set out in this advice is:

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Summary: Intervention & Options

Department /Agency: Food Standards Agency	Title: Impact Assessment of Revision of Food Standards Agency Clear Food Labelling Guidance	
Stage: Consultation	Version:	Date: 20 September 2007
Related Publications:		

Available to view or download at:

<http://www.>

Contact for enquiries: Ms Janet Mckenzie

Telephone: 02072768172

What is the problem under consideration? Why is government intervention necessary?

The Agency issued Clear Food Labelling Guidance that included recommendations on best practice in 2002 and is now seeking to issue improved Guidance. Industry and enforcement authorities find such guidance helpful.

Government intervention is necessary because some current labelling practices do not lead to labelling that is clear for consumers. These practices were assessed through a survey of the uptake of the recommendations in the existing Guidance. It will also be helpful to add details of relevant legislative requirements which are not covered by the existing Guidance.

What are the policy objectives and the intended effects?

The objectives are: to improve labelling presentation and clarity in the manufacturing and retail sectors, to help enforcement authorities provide improved labelling advice and to enable better understanding of best practice for SMEs through reformatted Guidance.

The intended effects are: to improve consumer confidence and consumers' abilities to make informed choices, to make providing advice easier for local authorities, and; to make use of the Guidance easier for SMEs.

What policy options have been considered? Please justify any preferred option.

Option1: No intervention.

Option 2: To revise the Guidance to reformat and update the document, and introduce new advice on best practice.

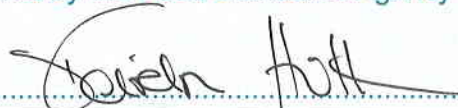
Option 2 is the preferred option as it would provide improved Guidance for industry and enforcement authorities which would benefit consumers as a result of clearer labelling, and because costs are anticipated only as a result of familiarisation with the revised Guidance.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? March 2010

Ministerial/CEO Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that (a) it represents a fair and reasonable view of the expected costs, benefits and impact of the policy, and (b) the benefits justify the costs.

Signed by the Food Standards Agency Chair*:



Date: 26-9-07

Summary: Analysis & Evidence

Policy Option:	Description:
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COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' Time taken to read Guidance by: businesses (6245 food manufacturers and 23830 specialist retailers) 30075x£6.72 =£202,104 enforcement authorities £8.82x469=£4,137
	One-off (Transition)	Yrs	
	£ £206,241	1	
	Average Annual Cost (excluding one-off)		
	£ 0		
	Total Cost (PV)		
		£ 206,241	
Other key non-monetised costs by 'main affected groups'			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups'
	One-off	Yrs	
	£ N/K		
	Average Annual Benefit (excluding one-off)		
	£ N/K		
Total Benefit (PV)			£ N/K
Other key non-monetised benefits by 'main affected groups' To introduce these changes to the Guidance would be helpful to consumers by leading to clearer labelling. This will be particularly helpful for particularly visually impaired consumers (see Full Equality Impact Assessment attached to PRIA).			

Key Assumptions/Sensitivities/Risks Assumed that (a) all non specialist retailers need to spend 30 minutes to familiarise with revised Guidance as they may produce their own labels (b) non-specialist food retailers will not need to be costed separately as their pre-packed food will largely be prepared by manufacturers.

Price Base Year	Time Period Years	Net Benefit Range (PV) £ N/K	NET BENEFIT (PV) (Increase/Decrease) £ N/K
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What is the geographic coverage of the policy/option?		UK	
On what date will the policy be implemented?		1/1/08	
Which organisation(s) will enforce the policy?		Local Authorities	
What is the total annual cost of enforcement for these organisations?		£ N/K	
Does enforcement comply with Hampton principles?		Yes	
Will implementation go beyond minimum EU requirements?		No	
What is the value of the proposed offsetting measure per year?		£ N/A	
What is the value of changes in greenhouse gas emissions?		£ Negligible	
Will the proposal have a significant impact on competition?		No	
Annual cost (£-£) per organisation (excluding one-off)		Micro Zero	Small Zero
Are any of these organisations exempt?		No	No
		N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)				(Increase - Decrease)
Increase	£ Zero	Decrease	£ Zero	Net £ Zero

Key: Annual costs and benefits: Constant Prices

If you require this information in an alternative format – such as audio, large print, Braille – please contact us.

PARTIAL REGULATORY IMPACT ASSESSMENT

(Please note this document will be revised according to comments received. See also summary Impact Assessment.)

1. Title of proposal

- 1.0 Revision of Food Standards Agency Food Labelling Guidance on Clear Food Labelling.

2. Purpose and intended effect

Purpose of the Guidance

- 1.0 The purpose of the Guidance is to provide a reference source for manufacturers and retailers on best practices for clear food labelling. It also provides enforcement authorities with guidance to help them improve labelling advice. The proposed revised version additionally sets out legal requirements on clarity and on what information needs to be provided on labels.

Objectives of the revision

- 2.0 To improve labelling practice with respect to clarity in the manufacturing and retail sectors and to improve consumer confidence in such labelling.
- 3.0 The Agency issued Clear Food Labelling Guidance with recommendations on best practice in 2002. The Agency is now seeking to reissue improved Guidance that contains revised best practice advice (taking account of small print size found on many labels), as well as the relevant, up to date legislative requirements for clear labelling.
- 4.0 The proposed revised Guidance contains a rationale to put recommendations into context, and has been reformatted to enable better understanding of best practice for SMEs. Diagrams have been added to make use of the Guidance easier for all readers.
- 5.0 The revised best practice advice promotes clearer labelling without losing the scope for flexibility in information provision.
- 6.0 The information on legislation in the Guidance is separated from the best practice advice to avoid any possible “gold plating”. Details of legislation have been extended to improve

awareness of requirements so that label designers will find it simpler to plan optimal label layouts.

Background

- Best Practice Advice and Legislation on Clear Food Labelling
- 7.0 Clarity of information provision via food labelling is governed by legislation as outlined in the draft new Guidance. Legislation on clarity may be revised when the current EU Review of Food Labelling is further advanced.
- Rationale for government intervention
- 8.0 The Food Standards Agency is committed to promoting informed choice. Improving food labelling is one of the Agency's priority objectives. Consumer research and public consultation have shown that clearer labelling is high on the list of consumers' demand for improvements.
- 9.0 It is approximately 5 years since the issue of the Guidance in 2002 and it would benefit from revision to give the best advice in the light of the small font size that is found to be used on many products, and from reformatting to make it more accessible to SMEs.
- 10.0 There have been demands for a document that makes clearer distinctions between best practice advice and legal requirements.
- 11.0 The revised draft Guidance includes additional advice on best practice, along with a section on current legislation, and an accompanying document 'Clear Food Labelling Relevant Legal Requirements' that provides further information on specific legal requirements.
- 12.0 A recent survey¹ of the extent of uptake of the Agency Guidance concluded that products had met most recommendations for best practice. Particularly evident was how closely the Guidance was followed on grouping of information (83% of products conformed to the major aspects), on the provision of nutrition information (89% of products, with 80% of these doing so voluntarily), and on clear and unambiguous date marks (96% of products). The recommendations that were not widely followed included the one on minimum font size (87% of products). A large number of products were also found to have given undue emphasis to features such as brand information at the expense of essential information as suggested by the Agency's advice (71% of products).
- 13.0 The series of recommendations made by the survey report were discussed at an Agency stakeholder meeting in 2006 where it was agreed that font size is not the only factor that makes text legible and that a new draft would be prepared for consultation that took account of the survey findings and the following conclusions:
- There are certain limitations on the printing of labels that should be taken in to consideration in the Guidance;
 - The Guidance should look at a combination of factors that make text legible (but at the same time remembering that quantifiable guidance is easier to enforce/assess);

¹ The survey was commissioned by the Agency and was undertaken by Campden and Chorleywood Food Research Association. Weblink:
www.food.gov.uk/foodlabelling/researchandreports/clearlabelsurvey

- The Guidance should differentiate between features that should be used with care, and those that are not recommended at all as set out in the table in the Clear Labelling Survey report;
- The Guidance should include the Agency's rationale for recommendations made in it.

0. Consultation

Within Government

3.1 The Agency has consulted closely with the Devolved Administrations in developing the revision of this Guidance. The Department of Trade and Industry's (DTI) Small Business Service (SBS), Lacors and specific local authority enforcement bodies have also been consulted.

Public consultation - Key stakeholders consulted

3.2 The Food Standards Agency has met with a wide range of key stakeholders including consumer organisations, trade associations and local authority enforcement bodies, to discuss the results of the survey that assessed the uptake of the Guidance and the revision of the Guidance. The following groups were represented: Anaphylaxis Campaign, British Retail Consortium, British Soft Drinks Association, Co-operative Group, Country Landowners Association, English Beef and Lamb Executive, Food and Drink Federation, National Federation of Consumer Groups, Small Business Service, Nestle UK, Marks and Spencer, Sainsburys and Tesco.

3.3 The Agency has held separate meetings with staff from the Royal National Institute for the Blind (RNIB) and with experts in label design who produce labels for a retailer with high best practice standards.

3.4 The current Consultation will include a much wider group of stakeholders.

4. Options

Two options are being considered in this public consultation.

Option 1: Do nothing.

This option would leave the Guidance as it is at present

Option 2 (i – vi): Revise Food Standards Agency Guidance to include:

- Section on current general legislation on what must appear on the label and clarity of this information.
- Updated information on allergen labelling legislation.
- An expanded rationale section, so that the best practice suggestions are provided with context.
- New best practice advice sections that cover prioritisation, layout and consistency and also print size and clarity, format, contrast and quality.

- Reformatted best practice advice to enable better understanding of best practice by SMEs, including diagrams to illustrate the points made for ease of reference for all readers.
- An Annex: 'Clear Food Labelling Relevant Legislation' that provides further information on specific legal requirements

5. Costs and Benefits

Sectors and Groups Affected

Food manufacturers, non-manufacturing packers, and retailers, and enforcement authorities.

At the Stakeholder meeting held on 30 March 2006, it was noted that the Small Business Service found the Guidance of use to small businesses.

All consumers are affected by clarity of labels, and visually impaired consumers who use labels are particularly affected.

Costs

Option 1

There would be no incremental costs to manufacturers from pursuing this option.

Option 2

Due to this being a revision of the Guidance and because it has no impact on legislation, the only incremental costs that will be incurred to businesses and enforcers will be through the reading of the new guidance – estimated to take approx. ½ an hour.

A reasonable estimate of the cost with respect to the time taken by businesses to read the guidance is £6.72. This figure is taken from the 2005 ONS ASHE (Annual Survey of Hours and Earnings) figures for Managers in Distribution, Storage and Retailing of £10.34 per hour (median value), which, in-line with the Standard Cost Model, is then up-rated by 30% to account for overheads, to give a figure of £13.44 per hour. Divided by two for half an hour, gives £6.72.

A reasonable estimate of the cost with respect to the time taken by enforcers to read the guidance is £8.82. This figure is taken from the 2005 ONS ASHE (Annual Survey of Hours and Earnings) figures for a Public Service Professional of £13.56 per hour (median value), which, in-line with the Standard Cost Model, is then up-rated by 30% to account for overheads, to give a figure of £17.63 per hour. Divided by two for half an hour, gives £8.82.

The attached summary Impact Assessment sets out costs for the UK for time taken to read Guidance by businesses and enforcement authorities:

- Businesses (6245 food manufacturers and 23830 specialist retailers) $30075 \times £6.72 = £202,104$
- Enforcement authorities $£8.82 \times 469 = £4,137$

The total one off cost is estimated at £206,241 with no ongoing costs. This is based on the assumptions that:

- () all non specialist retailers need to spend 30 minutes to familiarise with revised Guidance as they may produce their own labels

- () non-specialist food retailers will not need to be costed separately as their pre-packed food will largely be prepared by manufacturers.

Benefits

Option 1

There will be no incremental benefits from this option.

Option 2

To introduce these changes to the Guidance would be helpful to consumers by leading to clearer labelling. This will be particularly helpful for visually impaired consumers (see Full Equality Impact Assessment attached).

The revised Guidance would provide improved best practice advice for industry and information on legislation.

The Guidance also provides a reference document covering factors that affect clarity for local authorities to bear in mind when providing advice to industry, and also for considering whether enforcement action is appropriate in relation to Food or Trade Descriptions legislation, (although it should be recognised that the recommendations are best practice advice and not advice on compliance with legislation).

We welcome views from small business, industry and enforcement authorities, with regards to costs of familiarisation with the revised Guidance in particular.

We welcome views from all stakeholders on the costs and benefits of the proposed revisions.

We welcome stakeholder views on the extent to which the policy meets the needs of disabled consumers, particularly visually impaired consumers.

6 Small Firms Impact Test

6.1 Small businesses are being consulted. The Small Business Service (SBS) were invited to represent small businesses, and attended the formal Stakeholder meeting to discuss the results of the Clear Food Labelling Survey undertaken by Campden & Chorleywood Food Research Association. At this meeting the SBS expressed its support of the value of having best practice guidance and that it was particularly useful for small businesses.

6.2 The Guidance encourages greater take up of best practice while making it clear that it is not a legal requirement. If businesses do choose to follow best practice advice for their labels it is likely they will make any changes required in their own time and include the changes into a regular re-labelling cycle. Therefore it is not necessary to quantify costs on what would be a voluntary commercial decision.

We welcome views from any small business that may be affected by the proposed options

7. Competition assessment

Option 1: It is unlikely to have any effect.

Option 2: It is possible that implementation of this option may encourage or facilitate new growth within the market. Improved best practice and clearer labelling by industry may encourage consumer confidence in labelling and lead to increased purchasing, although this may be of particular products at the expense of others.

We welcome views from stakeholders on how the options may affect competition in the food sector.

8. Enforcement, sanctions and monitoring

8.1 Legislation, including sanctions, is already in place to protect consumers against unintelligible labelling. Legislation is unchanged. Current enforcement activities involve industry inspections of labels. Indications are that most of the major retailers are already following many of the proposed new best practice recommendations. Therefore it is anticipated that there will be no increased ongoing enforcement costs. The Guidance is anticipated to help enforcement authorities improve labelling in this area. .

8.2 The uptake of the Guidance will be monitored via feedback from stakeholders as part of the on-going policy process. Experts and representatives from disability groups will be consulted and the Agency is open to active involvement of stakeholders in its policy development. In consumer research projects researchers will ensure that disabled consumers are represented amongst the people involved. Agency mechanisms for monitoring and review include: open forums; stakeholder meetings; surveys; and monitoring general enquiries from the public, industry and enforcement authorities.

8.3 The Guidance will be reviewed within 3 years of issue.

We welcome views from enforcement authorities on how helpful they find this Guidance.

9. Sustainability

9.1 The environmental impact of the two options is likely to be negligible in our view.

9.2 Economic impacts are covered in other sections of the RIA. Although Option 2 has some economic cost it is outweighed by the social benefit to consumers.

9.3 Social impacts of the two options have been considered. A Full Disability Impact Assessment has been attached that deals with issues of visual impairment. People with learning difficulties, learning disabilities and Deaf people with BSL as a preferred language, and race equality issues with respect to languages are determined not to be impacted significantly by this particular policy.

We welcome comments from all stakeholders on the sustainability impacts of our Guidance.

10. Summary and Recommendations

This section will be completed as part of the full RIA, after the consultation is complete.

Contact point for enquiries and comments: name, address, telephone number and email address.

**Janet McKenzie
Food Standards Agency
Consumer Choice, Food Standards and Special Projects Division
Room 115B Aviation House
125 Kingsway
London
WC2B 6NH**

Tel: 0207 276 8172

E-mail: janet.mckenzie@foodstandards.gsi.gov.uk

Full Equality Impact Assessment

Title of policy/action:

Revision of Food Standards Agency Food Labelling Guidance on Clear Food Labelling

Name and contact details of the officer (s) responsible for the assessment:

Dr Jane Ince (Rm 115B Aviation House, 125 Kingsway, London WC2B 6NH, tel 0207 276 8141, jane.ince@foodstandards.gsi.gov.uk) and Ms Janet McKenzie (Rm 115B Aviation House, 125 Kingsway, London WC2B 6NH, tel 0207 276 8172, janet.mckenzie@foodstandards.gsi.gov.uk),

.....

➤ What is the main purpose/aim of the policy/action?

To improve labelling practice with respect to clarity, in, the manufacturing and retail sectors and to improve consumer confidence in such labelling.

➤ Which of the target equality groups within the initial assessment would be impacted by the policy/action?

Visually impaired (disabled) consumers using food labels and other types of information provided about food products would be affected. About two million people in the UK self define as having a sight problem or seeing difficulty. This estimate is derived from the Government Disability Survey conducted in 1996/7. There are currently 370,000 people in the UK registered as blind or partially sighted, a recent prevalence review by the RNIB estimated that up to an additional 20% (or 74,000) should also be registered. RNIB estimate that numbers are set to double over the next 25 years. This is due in part to the ageing of the population but also to an increase in underlying causes such as diabetes. In 2001 60% of the UK population wore spectacles and just below 6% wore contact lenses (National Statistics: Census 2001).

➤ Describe the effect of the policy/action on the group (s) which are impacted:

A recent survey carried out by the Agency demonstrated that the recommendation in the current Guidance for a minimum font size is not followed in many cases and this can lead to lack of clarity for all consumers. A revised draft Guidance text is being consulted on in this consultation which seeks to address all the factors that contribute to label clarity and improve legibility for all consumers.

The volume of information required on labels has increased in recent years. This coupled with increases in the amount of information provided voluntarily by manufacturers, has led to overcrowding on the labels of many products which may compromise clarity.

Consumers would be impacted positively if the Guidance is successful in encouraging greater label clarity. The Guidance however strikes a balance between the needs of manufacturers and the needs of consumers, therefore the minimum font size, especially when this is combined with poor contrast, will be much smaller than visually impaired consumers can read. There is also a balance between the amount of information consumers would like to be available on food labels and the amount that can be included given the size of font and size of the label etc.

In moving towards equality, we are hoping to find the right balance and to ensure that labels meet the requirements of visually impaired consumers better. The Guidance that we are consulting upon in this package aims to do this.

Overall this means that labels will continue to be difficult to access for most visually impaired consumers, but if the Guidance is successful in leading to better design in terms of combination of good size, contrast and other factors then the level of disadvantage will be reduced at least for some.

We have not included provision of Braille as a best practice recommendation because at present this is only provided by a small number of manufacturers.

➤ Describe any consultations (previous, current, and future) relating to this area:

- Who was consulted? The new draft Guidance is now going out for full public consultation and will be sent to disability representative stakeholder groups and experts with experience of visual impairment issues. The Royal National Institute for the Blind (RNIB) has been consulted during the drafting of the first issue of the Guidance in 2002 and has met with the Agency to assist in the production of this new draft. Commercial experts in label design, layout and printing have also been consulted who were selected because they produce designs of labels for retailers with high best practice standards in clarity. These retailers produce a limited range of products with Braille labels.
- Do the consultations/findings verify the potential advantage/disadvantage posed by implementation of this policy/action on equality target groups and each other? Yes, they have verified the potential advantage of this policy.

Discussions with RNIB have indicated that the revised policy in this consultation package will reduce the disadvantage experienced by visually impaired consumers. We are awaiting the results of this consultation to help us determine stakeholder views on the extent to which the policy meets the needs of disabled consumers, particularly visually impaired consumers.

➤ What additional information/research material was/will be obtained?

It has become apparent that the ageing population will experience greater difficulties in the future if problems are not addressed. It has also become apparent that

- (i) it is not possible to quantify legibility because it is controlled by a range of factors;
- (ii) a series of different visual problems are shown to increase with age that present different challenges to legibility.

Advice on clear print and design have been used from several sources including the RNIB Clear Print Guidelines.

Qualitative research was funded by the Food Standards Agency to help with the development of its Disability Equality Scheme by looking at the barriers that people with different disabilities may encounter in accessing healthy and safe food and making informed choices about food. The full research results are available at <http://www.food.gov.uk/multimedia/pdfs/disabilityandfood.pdf>.

This research found that while some of the visually impaired respondents were able to use labels with the aid of magnifying equipment (manual or computer linked), others had to rely on people who helped them with their shopping to tell them about the content, and they rarely tried to use labels themselves.

A number of issues were mentioned in connection with accessing food labels which, while most relevant to those with sensory impairments or learning

disabilities, also applied more widely. Across the sample, the principal problems were:

- the sheer amount of information that needs to be crowded into a small space and the consequent small type size; these act as a deterrent to engagement with the information and make it difficult to find and then read the items that the consumer is interested in.
- the technical nature of much of the language used (and especially the numerical values), the inconsistent use of terms and the vagueness of ingredients.

Suggestions for improvements in labelling focused on a rationalisation of the information, an increase in type size particularly for the most important information, consistency of where such information could be found on the pack and how it is presented, and consistency in how ingredients are expressed.

As a result of this consultation process on the revised Clear Labelling Guidance the Agency would like to obtain further views of disabled consumers.

- Will there be any changes made to the policy/action based on the results of the consultations/additional information?

The consultation responses will be carefully considered and then a decision will be made by the Agency on whether to amend the draft Guidance before its issue.

- Is there a monitoring/evaluation/review process in place to ensure the continued non-discriminatory implementation of this policy/action? Yes.

- What does this consist of? There will be periodic reviews of the Guidance and these will be subject to further equality assessments. The Agency will also consider input from stakeholders and correspondents in between review periods.
- How frequently will the policy/action be reviewed? Reviews take place every 3 years.

List of Interested Parties

3RD AID CONSULTING	ASSOCIATION OF PUBLIC
A G BARR	ANALYSTS OF SCOTLAND
ABBOT LABORATORIES LIMITED	ASSOCIATION OF RADICAL
ABR FOODS	MIDWIVES
ACE LABELS PLC/ELLIS LABELS	ASSURED BRITISH MEAT
& SYSTEMS LTD	ASSURED FOOD STANDARDS
ACTION FOR BLIND PEOPLE	ATWOOD BARRY
ADAMS PORK PRODUCTS	BABY MILK ACTION
ADAMSON BSMG	BAKER & MCKENZIE
ADVERTISING ASSOCIATION	BAKKAVOR (BIRMINGHAM) LTD
ADVERTISING STANDARDS AUTHORITY	BANGLADESH CATERERS
ADVISORY BODY FOR SOCIAL	ASSOCIATION IN GB
SERVICES CATERING	BARBOUR INDEX PLC
AGE CONCERN	BAREFIELDS LTD
AGRICULTURAL INDUSTRIES	BARENTZ BV
CONFEDERATION	BARNET LONDON BOROUGH
ALCONTROL LABORATORIES	COUNCIL
AL-KHOEI FOUNDATION	BASIC SKILLS AGENCY
ALLCHEM INTERNATIONAL	BBSRC INSTITUTE OF FOOD
ALLERGY ALLIANCE	RESEARCH
ALLIED DOMEQ RETAILING LTD	BEE FARMERS ASSOCIATION
ALLIED TECHNICAL CENTRE	OF THE UK
ALLSPORTS INTERNATIONAL LTD	BEE SERVICES
ALPHA FLIGHT SERVICES	BELSO'S (UK) CEREALS LTD
AMERICAN FOOD INTERNATIONAL	BERNARD MATTHEWS LTD
AMERICAN PEANUT COUNCIL	BERRY OTTAWAY AND ASSOCIATES
AMICUS	LIMITED
ANAPHYLAXIS CAMPAIGN	BETH-DIN
ANIMAL MEDICINES INSPECTORATE	BEVAN ASHFORD
AN-NISA SOCIETY	BICODE LTD
AQUINAS COLLEGE	BIOFORCE (UK) LTD
ARKARIUS LIMITED	BIRD & BIRD
ARKOPHARMA (UK) LTD	BIRMINGHAM CHILDRENS HOSPITAL
ASDA STORES LIMITED	BIRMINGHAM CITY LABORATORIES
ASHURST	BIRMINGHAM LIBRARY SERVICES
ASHWELL ASSOCIATES	BISCUIT, CAKE, CHOCOLATE &
ASIAN PEOPLE DISABILITY ALLIANCE	CONFECTIONERY ASSOCIATION
ASSISTANTE SECTORIELLE	BOLTON MBC
AGRO-ALIMENTAIRE	BONNIA PETITE BANQUETING LTD
ASSISTED LIVING FOUNDATION	BOOKER LTD
ASSOCIATE PARLIAMENTARY	BOOTS THE CHEMIST
FOOD & HEALTH FORUM	BOROUGH OF REIGATE
ASSOCIATED BRITISH FOODS PLC	& BANSTEAD
ASSOCIATION OF BAKERS INGREDIENTS	BOURNE SALADS
MANUFACTURERS	BOURNMOUTH UNIVERSITY
ASSOCIATION OF BRITISH ABATTIOR	BOWYERS (WILTSHIRE) LTD
OWNERS	BRADFORD COUNCIL OF
ASSOCIATION OF CEREAL FOOD	MOSQUES
MANUFACTURERS LTD	BRAKE CO LTD
ASSOCIATION OF CONVENIENCE STORES	BRAKES
ASSOCIATION OF MUSLIM	BRENT COUNCIL
PROFESSIONALS	BRETBY ANALYTICAL CONSULTANTS LTD
ASSOCIATION OF MUSLIM SCHOLARS	BRISTOL CITY COUNCIL
ASSOCIATION OF PASTRY CHEFS	BRITANNIA HEALTH PRODUCTS LTD
ASSOCIATION OF PORT HEALTH	BRITISH AIRWAYS HEALTH SERVICES
AUTHORITIES	BRITISH BEEKEEPER'S ASSOCIATION

List of Interested Parties

BRITISH BEER & PUB ASSOCIATION
BRITISH CHEESE BOARD
BRITISH COFFEE ASSOCIATION
BRITISH COUNCIL OF ORGANISATIONS
OF DISABLED PEOPLE
BRITISH DEAF ASSOCIATION
BRITISH DENTAL ASSOCIATION
BRITISH DIETETIC ASSOCIATION
BRITISH DYSLEXIA ASSOCIATION
BRITISH EGG INDUSTRY COUNCIL
BRITISH ESSENTIAL OILS
ASSOCIATION
BRITISH FERMENTATION PRODUCTS
BRITISH FOOD IMPORTERS &
DISTRIBUTORS ASSOCIATION
BRITISH FROZEN FOOD FEDERATION
BRITISH FRUIT JUICE ASSOCIATION
BRITISH GOAT SOCIETY
BRITISH HEART FOUNDATION
BRITISH HEART FOUNDATION
PROMOTION RESEARCH GROUP
BRITISH HERBAL MEDICINE
ASSOCIATION
BRITISH HOSPITALITY ASSOCIATION
BRITISH HUMANIST ASSOCIATION
BRITISH INSTITUTE OF LEARNING
DISABILITIES
BRITISH MEAT PROCESSORS
ASSOCIATION
BRITISH MEDICAL ASSOCIATION
BRITISH NUTRITION FOUNDATION
BRITISH PIG ASSOCIATION
BRITISH POTATO MARKETING
ASSOCIATION
BRITISH POULTRY COUNCIL
BRITISH RETAIL CONSORTIUM
BRITISH SANDWICH ASSOCIATION
BRITISH SOFT DRINKS
ASSOCIATION LTD
BRITISH STANDARDS INSTITUTION
BRITISH SUGAR PLC
BRITISH VETERINARY ASSOCIATION
BRITVIC SOFT DRINKS LTD
BUCKINGHAMSHIRE HEALTH
AUTHORITY
BUSINESS IN SPORT & LEISURE
CADBURY SCHWEPPE'S PLC
CAMACOM LAW (SOLICITORS) LTD
CAMBRIDGE MANUFACTURING
COMPANY LTD
CAMEDICA
CAMPAIGN FOR REAL ALE LTD
CAMPDEN & CHORLEYWOOD FOOD
RESEARCH ASSOCIATION
CANTOX HEALTH SCIENCES
INTERNATIONAL

CAPABILITY SCOTLAND
CARVER WILDE COMMUNICATIONS
CATALENT PHARMA SOLUTIONS
CATERER & HOTELKEEPER
CATERING UPDATE
CCI
CENTRE FOR FOOD & HEALTH
STUDIES LTD
CEREAL PARTNERS WORLDWIDE
CERESTAR
CHARLES BARKER PLC
CHARLES ROWE
CHARTERED INSTITUTE OF
ENVIRONMENTAL HEALTH
CHEMIST & DRUGGIST
CHICHESTER COLLEGE OF ARTS
SCIENCES & TECHNOLOGY
CHILD ACTION PREVENTION TRUST
CHILLED FOOD ASSOCIATION LTD
CHINESE NATIONAL HEALTHY LIVING
CENTRE
CHOCOLATES FOR CHOCOHOLICS LTD
CHRISTCHURCH BOROUGH COUNCIL
CHURCHES' COMMISSION FOR
INTER-FAITH RELATIONS
CITY OF YORK COUNCIL
CLARKE WILLMOTT SOLICITORS
COASTAL TRADING
COCA COLA TRADING COMPANY
COCA-COLA COMPANY
COELIAC UK
COFFEE TRADE FEDERATION LTD
COMMUNITY FOODS LTD
COMMUNITY PRACTITIONERS AND
HEALTH VISITORS ASSOCIATION
CONFEDERATION OF INDIAN
ORGANISATIONS (UK)
CONFEDERATION OF
SUNNI MOSQUES
CONTRACT FOOD LTD
COOKIE MAN LTD.
CO-OPERATIVE GROUP
COORS BREWERS PLC
CORNWALL COUNTY COUNCIL
COSUCRA
COTT BEES LTD
COTTAGE RESTAURANT & LODGE
COUNCIL FOR RESPONSIBLE
NUTRITION
COUNSEL LTD
COUNTRY MARKETS LTD
COURAGE LTD
COVENTRY HEALTH AUTHORITY
CP KELCO UK LTD
CRAIGAVON AREA HOSPITAL
GROUP NSS

List of Interested Parties

CRANBERRY FOODS LIMITED	EDLONG COMPANY LTD
CULLINANE ASSOCIATES LTD	ELKS BISCUITS
CUMBRIA COUNTY COUNCIL	ENABLE SCOTLAND
D & T ASSOCIATION	ENGLISH TOURIST BOARD
DABUR INDIA LTD	ENSURING POSITIVE FUTURES
DABUR RESEARCH FOUNDATION	ENVIRONMENTAL DATA SERVICES
DAILYCER LTD	ENVIRONMENTAL HEALTH AND TRADING
DAIRY COUNCIL	STANDARDS SERVICE
DAIRY CREST GROUP	ENVIRONMENTAL HEALTH DEPARTMENT
DAIRY UK LTD	EQUALITIES NATIONAL COUNCIL
DALE FARM (GB) LTD	EQUALITY COMMISSION FOR NORTHERN
DANISCO INGREDIENTS UK LTD	IRELAND
DANISH BACON & MEAT	ESSELTE METO LTD
COUNCIL LTD	ESSENTIAL TRADING CO-OPERATIVE LTD
DANISH BACON COMPANY PLC	EUROFINS
DEAFBLINDUK	EUROFINS LABORATORIES LIMITED
DEFENCE CATERING GROUP	EUROPE ANALYTICA
DEFRA - BASD	EUROPEAN FEDERATION OF HEALTH
DEL MONTE FOODS (UK) LTD	PRODUCT MANUFACTURERS
DEPARTMENT FOR BUSINESS,	ASSOCIATION
ENTERPRISE	EUROPEAN FOOD LAW ASSOCIATION UK
AND REGULATORY REFORM	EVERSHEDS
DEPARTMENT FOR CULTURE,	EXERTER & DISTRICT CONSUMER GROUP
MEDIA & SPORT	EXPRESS DAIRIES
DEPARTMENT FOR INTERNATIONAL	F HOFFMAN - LA ROCHE LTD
DEVELOPMENT	F I DATA SERVICES
DEPARTMENT FOR TRADE & INDUSTRY	FEDERATION OF BAKERS
DEPARTMENT OF ENVIRONMENT	FEDERATION OF DANISH PIG
FOOD AND RURAL AFFAIRS	PRODUCERS & SLAUGHTERHOUSES
DEPARTMENT OF HEALTH	FEDERATION OF JAIN ORGANISATIONS
DEPARTMENT OF LOCAL	FEDERATION OF SMALL BUSINESSES
GOVERNMENT & ENVIRONMENT	FEDERATIONS OF SYNAGOGUES
DEPARTMENT OF TRADE & INDUSTRY	FIBRISOL SERVICE LTD
DEPT OF AGRICULTURE FOR NI	FIRST THOUGHT CONSULTING
DEPT OF TRADE & INDUSTRY	FISH TECHNOLOGY CONSULTANT
DIETICIAN'S DEPARTMENT	FISHMONGER'S COMPANY
DIFFERENTIABILITY	FOOD & DRINK FEDERATION
DISABILITY ACTION	FOOD & HEALTH RESEARCH
DISABILITY ADVICE BRADFORD	FOOD ADDITIVES & INGREDIENTS
DISABILITY ALLIANCE	ASSOCIATION
DISABILITY AWARENESS IN ACTION	FOOD AND DRINK FEDERATION (FDF)
DISABILITY RIGHTS COMMISSION	FOOD BRAND GROUP (THE)
DISABILITY UK	FOOD COMMISSION (UK) LTD
DISABILITY WALES	FOOD ENGINEERING INTERNATIONAL
DISABLED LIVING FOUNDATION	MAGAZINE
DKSH GREAT BRITISH LTD	FOOD FROM BRITAIN
DORSET COUNTY COUNCIL	FOOD LAW GROUP
DOWNS SYNDROME ASSOCIATION	FOOD LINKS
DR STUART'S BOTANICAL TEAS	FOOD STANDARDS AUSTRALIA
DRUCES & ATTLEE	NEW ZEALAND
DURHAM CITY COUNCIL	FOODAWARE
DYSLEXIA INSTITUTE	FOODS STANDARD AGENCY
EAST RIDING OF YORKSHIRE	(NORTHERN ISLAND)
COUNCIL	FOR CHILDREN
EAST SUSSEX COUNTY COUNCIL	FORUM PRODUCTS LTD
EAST SUSSEX DISABILITY ASSOCIATION	FREELANCE DIETITIAN

List of Interested Parties

& NUTRITIONIST	HMPS
FRESENIUS KABI LTD	HOLLAND & BARRETT
FRESH PACKS FOODS LTD	HOME OFFICE HEALTH & SAFETY SERVICES
FRESH PRODUCE CONSORTIUM	HONEY ASSOCIATION
FRIDAY'S LTD	HORTICULTURE RESEARCH INTERNATIONAL
FRIENDS OF THE EARTH (HQ)	HOSPITAL CATERERS ASSOCIATION
FSA ADVISORY COMMITTEE FOR WALES	HOULSTON MANOR WATER
FUEL PR (CLIENTS INCLUDE DANONE)	HOWARD FOUNDATION RESEARCH GROUP
G R LANE HEALTH PRODUCTS LTD	HUSH (HAEMOLYTIC URAEMIC SYNDROME HELP)
GEEST PLC	HYGIENE & NUTRITION IN FOOD SERVICE
GENERAL DIETARY LTD	ICE FRESH FOODS LTD
GIN & VODKA ASSOCIATION	ILCHESTER CHEESE CO LTD
GIRACT	ILS LTD
GIRAG SA	IMAMS & MOSQUES COUNCIL (UK)
GLAXOSMITHKLINE	INCLUSION SCOTLAND
GLENRYCK FOODS LTD	INDEPENDENT LIVING FUND
GLOUCESTER CITY COUNCIL (127)	INDEPENDENT LIVING SCHEMES YORK
GM FREEZE CAMPAIGN	INDEPENDENT NUTRITION LOGIC
GOODMAN DERRICK	INFANT & DIETETIC FOODS ASSOCIATION (IDFA)
GOVERNMENT OF WESTERN AUSTRALIA	INNOCENT LTD
GRAMPIAN COUNTRY FOOD GROUP	INSTITUTE OF EDUCATION
GREATER LONDON ACTION ON DISABILITY	INSTITUTE OF FOOD SCIENCE & TECHNOLOGY
GREATER LONDON ASSOCIATION OF DISABLED PEOPLE	INSTITUTE OF GROCERY DISTRIBUTION
GREENCITY WHOLEFOODS	INSTITUTE OF PRACTITIONERS IN ADVERTISING
GREENWOODS SOLICITORS LLP	INSTITUTE OF REFRIGERATION
H J HEINZ	INTER FAITH NETWORK FOR THE UK
H M PRISON SERVICE	INTERNATIONAL FEDERATION OF ESSENTIAL OILS & AROMA TRADES
H T WEBB & CO LTD	INTERNATIONAL FISH MEAL & OIL MANUFACTURERS ASSOCIATION
HALAL FOOD AUTHORITY	INTERNATIONAL FLIGHT CATERING
HALAL MEAT	INTERNATIONAL MARKETING
HALEWOOD INTERNATIONAL LTD	INTERNATIONAL MEAT TRADE ASSOCIATION
HALTON BOROUGH COUNCIL (889)	INTERNATIONAL OBESITY TASK FORCE
HAMPSHIRE COUNTY COUNCIL	INTERNATIONAL PECTIN PRODUCERS ASSOCIATION
HAMPSHIRE SCIENTIFIC SERVICES	INTERNATIONAL SOFT DRINK COUNCIL
HAMPSHIRE TRADING STANDARDS	INTERSERVE (FACILITIES MANAGEMENT) LIMITED
HANDMADE CAKE COMPANY	INTERTAB
HARRODS LTD	ISBA
HARROW LONDON BOROUGH COUNCIL	ISBOURNE ENVIRONMENTAL LTD
HARTWELL FOOD RESEARCH LTD	ISLAMIC COUNCIL OF SCOTLAND
HAZELWOOD PRESERVES LTD	ISLAMIC CULTURAL CENTRE
HAZLEWOOD	ISLAMIC FOOD & NUTRITION COUNCIL
HEALAN INGREDIENTS LTD	ISLAMIC FORUM OF EUROPE
HEADWAY – THE NATIONAL HEAD INJURIES ASSOCIATION LIMITED	ISLAMIC SHARIAH COUNCIL
HEALTH CARE PRODUCTS	
HEALTH FOOD MANUFACTURERS ASSOCIATION	
HEALTH PROMOTION DEPARTMENT	
HEATHER PAINE ASSOCIATES	
HELP THE AGED	
HIGH COMMISSION FOR THE REPUBLIC OF SOUTH AFRICA	
HILDRED & COCKER LTD	

List of Interested Parties

ISP ALGINATES	OF REGULATORY SERVICES
J RALPH BLANCHFIELD CONSULTANCY	LONDON BOROUGH OF BARKING
J SAINSBURY PLC	& DAGENHAM
JAIN SAMAJ EUROPE	LONDON BOROUGH OF BRENT
JAMES GILBERTSON & CO	(ENVIRONMENTAL HEALTH)
JEAN GARON PUBLIC RELATIONS	LONDON BOROUGH OF ENFIELD
JETRO LONDON	LONDON BOROUGH OF SOUTHWARK
JOHN RUSSELL ASSOCIATES	LONDON RETAIL MEAT TRADERS
JOHN TAYLOR AND SON	ASSOCIATION
JOHN WEST FOODS LTD	LOVELL WHITE DURRANT SOLICITORS
JOHN WYETH & BROTHER LTD	LOVELLS
JOHNSTON CONSULTING	LYN ANDERSON
JOINT COUNCIL FOR ANGLO	LYONS TETLEY LTD
CARIBBEAN CHURCHES	LYSI HS
K J LOVERING & CO LTD	MACFARLANES
KELLER & HECKMAN LLP	MALTSTERS ASSOCIATION
KELLOGG COMPANY (GB) LTD	MANCHESTER METROPOLITAN
KELLOGG EUROPE TRADING LTD	UNIVERSITY
KELLOGG LUX III S.A.R.L.	MANCHESTER RUSK CO LTD
KENT TRADING STANDARDS	MARDON MCCOY LTD
KERRY FOODS UK	MARGARET ANDERSON
KETTLE FOODS	MARGARINE & SPREADS
KIKKOMAN TRADING EUROPE GMBH	ASSOCIATION
KINNERTON CONFECTIONARY CO LTD	MARKAZI JAMIAT AHLE HADITH
KITCHEN RANGE FOODS LTD	MARKETING LAW ADVISORY SERVICE
KNIGHT INTERNATIONAL	MARKS & SPENCER PLC
KRAFT FOODS UK LTD	MATTHEW CLARK LTD
L B CROYDON FOOD TEAM	MAYER BROWN ROWE & MAWE LLP
L HEPNER & ASSOCIATES LTD	MCCAIN FOODS
LABORATORY OF THE GOVERNMENT	MCCORMACK FOODS
CHEMIST (LGC)	MCDONALD'S RESTAURANTS LTD
LAMBETH TRADING STANDARDS	MCKENNA & CO
LANCASHIRE COUNCIL OF MOSQUES	MEAT & LIVESTOCK COMMISSION (MLC)
LANCASHIRE COUNTY COUNCIL	MED & HEALTHCARE PROD REG
LAW COMMISSION	AFFAIRS (MHRA)
LAW LABORATORIES LTD	MEDICINES & HEALTHCARE PRODUCTS
LAWCODE	REGULATORY AGENCY
LAWDATA LTD	MENCAP
LAWRENCE GRAHAM	MERIDIAN FOODS - TECHNICAL
LEARNING DISABILITY IMPLEMENTATION	DEPARTMENT
ADVISORY GROUP	MERRYDOWN PLC
LEATHERHEAD FOOD INTERNATIONAL	MERRYVALE
LEE KEE KUM (HONG KONG) FOODS LTD	METAL PACKAGING MANUFACTURERS
LEEDS CITY COUNCIL (413)	ASSOCIATION
LEEDS METROPOLITAN UNIVERSITY	MICRON2
LEICESTER REFERENCE AND	MIDWIVES INFORMATION & RESOURCE
INFORMATION LIBRARY	SERVICE
LEICESTERSHIRE COUNTY ANALYST	MILTON KEYNES COUNCIL
LAB	MJSR ASSOCIATES
LEWIS SILKIN SOLICITORS	MOY PARK LTD
LGC (TEDDINGTON) LTD	MP MEDIA SERVICES
LGC LTD	MR JAMES LEGGE
LIDL UK GMBH	MR R MCKINLEY
LINX PRINTING TECHNOLOGIES PLC	MRS G WARD
LLLGB OFFICE	MULLER GROUP UK
LOCAL AUTHORITIES CO-ORDINATORS	MULTILABELS LTD

List of Interested Parties

MUSHROOM GROWERS ASSOCIATION	NORTHAMPTONSHIRE COUNTY COUNCIL
MUSLIM COLLEGE	NORTON ROSE
MUSLIM DOCTORS & DENTISTS ASSOCIATION	NOTTINGHAMSHIRE COUNTY COUNCIL
NAT SOCIETY FOR PHENYLKENORIA (UK)	NOVARTIS MEDICAL NUTRITION
NATIONAL ASSOCIATION OF BRITISH & IRISH MILLERS	NUTRAGEN LTD
NATIONAL ASSOCIATION OF CIDER & PERRY MAKERS	NUTRICIA LTD
NATIONAL ASSOCIATION OF HEALTH STORES	NUTRILAW
NATIONAL ASSOCIATION OF MASTER BAKERS,	NUTRITION SOCIETY
CONFECTIONERS & CATERERS	ODDBINS
NATIONAL BEEF ASSOCIATION	ODYSEY LTD
NATIONAL CHILDBIRTH TRUST	OMYA UK LTD
NATIONAL CONSUMER COUNCIL	ORAFI
NATIONAL CONSUMER FEDERATION (NCF)	ORANGINA GROUP
NATIONAL COUNCIL OF HINDU TEMPLES UK	ORGANIC AND FAIR CONSULTING
NATIONAL COUNCIL OF WOMEN	ORGANIC FOOD FEDERATION
NATIONAL EDIBLE OIL DISTRIBUTORS ASSOCIATION	ORGANIX BRANDS PLC
NATIONAL FARMERS UNION (NFU)	OXFAM FAIR TRADING COMPANY
NATIONAL FEDERATION OF THE BLIND OF THE UK	OXFORD UNIVERSITY DEPARTMENT OF PUBLIC HEALTH & PRIMARY CARE
NATIONAL FEDERATION OF FISHERMAN'S ORGANISATIONS	OXFORDSHIRE COUNTY COUNCIL
NATIONAL FEDERATION OF MEAT & FOOD TRADERS	PAI LTD
NATIONAL FEDERATION OF WOMENS INSTITUTES	PARTIALLY SIGHTED SOCIETY
NATIONAL FOOD CENTRE	PEPSICO INTERNATIONAL
NATIONAL HEART FORUM	PERCHARD'S
NATIONAL INSTITUTE FOR HEALTH & CLINICAL EXCELLENCE	PERRIGO UK
NATIONAL INSTITUTE OF MEDICAL HERBALISTS LTD	PERSHORE GROUP OF COLLEGES
NATIONAL PHAMACEUTICAL ASSOC	PETER WHATMUFF
NATIONAL PIG ASSOCIATION	PETTIFOR MORROW & ASSOCIATES LTD
NCH ACTION FOR CHILDREN	PIZZA HUT (UK)
NESTLE ROWNTREE HQ	PLYMOUTH AND DISTRICT SOROPTIMIST INTERNATIONAL
NESTLE UK LTD	PLYMOUTH CONSUMER GROUP
NEVILLE CRADDOCK ASSOCIATES	POOLE TRADING STANDARD DEPT
NEW COVENT GARDEN FOOD CO LIMITED	POTATO PROCESSORS ASSOCIATION
NEWCASTLE UPON TYNE CITY LIBRARY	POTTERS HERBAL SUPPLIES LTD
NEWRY & MOURNE DISTRICT COUNCIL	POWER HEALTH PRODUCTS LTD
NEWSPAPER SOCIETY	PREMIER GROCERY PRODUCTS LTD
NINEWELLS HOSPITAL	PREMIER INTERNATIONAL FOODS
NORTH HERTFORDSHIRE NHS TRUST	PRIME MINISTER'S OFFICE
NORTH SOMERSET COUNCIL TRADING STDs	PROPRIETARY ASSOCIATION OF GREAT BRITAIN
NORTH YORKSHIRE EAST FEDERATION OF WOMEN'S INSTITUTE	PROTEIN TECHNOLOGY INTERNATIONAL
	PROVISION TRADE FEDERATION
	QUALITY MEAT SCOTLAND
	QUEEN ELIZABETH FEDERATION FOR DISABLED PEOPLE
	QUEEN ELIZABETH HOSPITAL
	QUEST VITAMINS LTD
	QVC
	RCC REGISTRATION AND
	RCC REGISTRATION AND
	REAPERS
	RHM GROCERY
	RHM GROUP

List of Interested Parties

RHM TECHNOLOGY LTD	SEFCOL INGREDIENTS LIMITED
RIO TRADING COMPANY (HEALTH) LTD	SENSE
RNID SCOTLAND	SEVEN SEAS LTD
ROCWELL NATURAL MINERAL WATER	SHELLFISH ASSOCIATION OF
RON DEWDNEY LTD	GREAT BRITAIN
ROSS YOUNGS INTERNATIONAL LTD	SHS INTERNATIONAL LIMITED
ROTHERHAM HEALTH AUTHORITY	SIKH COUNCIL FOR INTER FAITH
ROUSE & CO	RELATIONS & CONVENOR OF THE SIKH
ROYAL ASSOCIATION FOR DISABILITY	NETWORK
AND REHABILITATION	SIMKINS PARTNERSHIP
ROYAL COLLEGE OF MIDWIVES	SIMMONS & SIMMONS SOLICITORS
ROYAL COLLEGE OF PAEDIATRIC &	SIMPLY ORGANIC - SERIOUS FOOD
CHILD HEALTH	COMPANY
ROYAL COLLEGE OF PHYSICIANS	SIMTOM FOOD PRODUCTS
ROYAL COMMISSION ON	SIS (SCIENCE IN SPORT) LTD
ENVIRONMENTAL	SLEAFORD QUALITY FOODS LIMITED
POLLUTION	SLOUGH BOROUGH COUNCIL
ROYAL DANISH EMBASSY	SMA NUTRITION LTD
ROYAL INSTITUTE OF PUBLIC HEALTH	SMALL INDEPENDENT BREWERS
ROYAL LONDON HOSPITAL	ASSOCIATION
ROYAL NATIONAL INSTITUTE FOR	SMH CONSULTANCY
DEAF PEOPLE	SNACK, NUT & CRISPS MANUFACTURERS
ROYAL NATIONAL INSTITUTE FOR THE	ASSOCIATION
BLIND	SODEXHO BUSINESS & INDUSTRY
ROYAL PHARMACEUTICAL SOCIETY OF	SOMERFIELD STORES LIMITED
GREAT BRITAIN	SOMERFIELD STORES LTD
ROYAL SOCIETY FOR THE PROMOTION	SOMERSET COUNTY COUNCIL
OF HEALTH	SONNENBERG
RUPERT STANLEY COLLEGE OF	SOUTH BANK UNIVERSITY
FURTHER EDUCATION	SOUTH EAST DISABILITY EQUALITY
RUSSELL HUME	COUNCIL
RYVITA CO LTD	SOUTH WEST CONSERVATIVES
S M A NUTRITION	SOUTHALL AREA COMMUNITY NETWORK
S&N UK	SOVEREIGN FOOD GROUP LTD
SAFEPHARM LABORATORIES LTD	ST GEORGE'S HOSPITAL MEDICAL
SAMUEL SMITH BREWERY	SCHOOL
SARA LEE PERSONAL CARE UK LTD	STAFFORDSHIRE COUNTY ANALYST
SCHOOL OF SCIENCE & TECHNOLOGY	STARBAKE YORKSHIRE LTD
SCHWARZ PHARMA LTD	STEPHEN RHODES ASSOCIATES
SCIENTIFIC ADVISORY COMMITTEE	STOKE ON TRENT CITY COUNCIL
NUTRITION	STUTE FOODS LTD
SCOTCH FOOD CO-ORDINATING	SUFFOLK SAUCERY LIMITED
COMMITTEE	SUGAR BUREAU
SCOTCH WHISKY ASSOCIATION	SURREY COUNTY COUNCIL
SCOTTISH ACCESSIBLE INFORMATION	TRADING STANDARDS
FORUM	SURREY TRADING STANDARDS
SCOTTISH CONSORTIUM FOR LEARNING	TAMESIDE METROPOLITAN
DISABILITY	BOROUGH COUNCIL
SCOTTISH DISABILITY EQUALITY FORUM	TAYLOR JOYNSON GARRETT
SCOTTISH EXECUTIVE RURAL AFFAIRS	TEA BUYERS ASSOCIATION
DEPT	TESCO STORES PLC
SCOTTISH FEDERATION OF MEAT	THOMAS LOWNES AND CO LTD
TRADERS ASSOCIATION	THOMPSON & CAPPER
SCOTTISH QUALITY SALMON LTD	THOMPSON & CAPPER LTD
SEA FISH INDUSTRY AUTHORITY	THORNTONS PLC
SEAFOOD LABORATORIES LTD	TOAST

List of Interested Parties

TONY MACE MARKETING	UNIV-VIBE EXPORT LTD
TRADITIONAL FARM FRESH TURKEY ASSOCIATION	VEGA
TRANSPORT & GENERAL WORKERS UNION	VEGAN SOCIETY
TREATS ICE CREAM LTD	VEGETARIAN & VEGAN FOUNDATION
TULIP INTERNATIONAL (UK) LTD	VEGETARIAN SOCIETY OF THE UK LIMITED
TWININGS LTD	VENTRESS TECHNICAL SERVICES LTD
UDEX LTD	VENTURE FOODS (UK) LIMITED
UK ACTION COMMITTEE ON ISLAMIC AFFAIRS	VINEGAR BREWERS FEDERATION
UK ASSOCIATION OF FROZEN FOOD PRODUCERS	VITRION UK LTD
UNIGREG LIMITED	VOICEVALE LTD
UNILEVER CENTRAL RESOURCES LTD	WAITROSE LTD
UNILEVER PLC	WALKER & SONS (LEICESTER) LTD
UNILEVER R&D	WALKERS CHARNWOOD BAKERY
UNILEVER UK FOODS	WALSALL METROPOLITAN BOROUGH COUNCIL
UNILEVER UK LIMITED	WARWICKSHIRE COUNTY COUNCIL
UNION OF MUSLIM ORGANISATIONS OF UK & EIRE	WEETABIX LIMITED
UNION PSD	WELSH ASSEMBLY GOVERNMENT
UNITED BISCUITS (UK) LTD	WELSH CONSUMER COUNCIL
UNITED DISTILLERS INTERNATIONAL TECHNOLOGICAL SERVICES	WELSH FOOD ALLIANCE
UNITED GROUP RMD	WESSEX FOODS
UNITED KINGDOM VINEYARDS ASSOCIATION	WEST BERKSHIRE DISTRICT COUNCIL
UNIVERSITY OF BIRMINGHAM	WEST YORKSHIRE JOINT SERVICES
UNIVERSITY OF BRADFORD	WESTERN GROUP ENVIRONMENTAL
UNIVERSITY OF CENTRAL LANCASHIRE	WESTERN RESEARCH LABORATORIES
UNIVERSITY OF LEICESTER	WESTLER FOODS LTD
UNIVERSITY OF LIVERPOOL	WHICH?
UNIVERSITY OF READING	WHITBY SEAFOODS LTD
UNIVERSITY OF READING	WHITEHOUSE CONSULTANCY LTD
UNIVERSITY OF SURREY	WICKHAM LABORATIES LTD
UNIVERSITY OF SUSSEX	WICKHAM LABORATORIES LTD
WM MORRISON SUPERMARKETS PLC	WILTSHIRE COUNTY COUNCIL
WOMEN'S FOOD & FARMING UNION	WILTSHIRE DIRECT SERVICES
WORCESTERSHIRE COUNTY COUNCIL	WINE & SPIRIT TRADE ASSOCIATION
XYROFIN (UK) LTD	
YORK NUTRITIONAL LABORATORY	
YORKSHIRE PANTRY (THE)	
ZOROASTRIAN TRUST FUNDS OF EUROPE	