



A Seminar on EU Regulations on Food Labelling

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Session 6 - Additional Labelling Requirements
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Outline



- Additional General Requirements
- Protected Designations
- Additive Labelling
- Genetically Modified Foods Labelling
- Lot Marking
- Beef Labelling
- Fish Labelling
- Compositional Requirements
- Labelling Examples



ADDITIONAL GENERAL REQUIREMENTS



Additional General Requirements



- Directive lays down additional labelling requirements
- Information to be provided in certain circumstances
- Applies to limited products



Additional General Requirements



- Irradiation
 - Product is irradiated
 - Ingredient(s) are irradiated
 - “Irradiated”; or
 - “Treated with ionising radiation”



Additional General Requirements



- Raw Milk
 - Not pasteurised
 - “This milk has not been heat treated and therefore may contain organisms hazardous to health”
 - Buffalo milk exempt



Additional General Requirements



- Skimmed milk and non-milk fat products
 - Capable of being a milk substitute
 - Not infant formula or “follow on” milk for small children
 - “Not to be used for babies” or similar



Additional General Requirements



- Alcoholic Drinks
 - >1.2% Alcohol By Volume (ABV)
 - Alcohol content to be provided
 - “1.5% ABV”
 - 1 Decimal place max



Additional General Requirements



- Packed in a Gas
 - Gas to extend shelf life
 - “Packaged in a protective atmosphere”
 - Gas must be authorised food additive



Additional General Requirements



- Liquorice Presence
 - Levels of Glycyrrhizinic Acid
 - Max levels for Confectionary & Alcoholic Drinks

Food	Alcoholic Drinks >1.2% ABV	Alcoholic Drinks ≤1.2% ABV	Warning Required
=>100mg/kg < 4g/kg	=>10mg/l <300mg/l	=>10mg/l <50mg/l	“Liquorice” unless stated in ingredients or name
=>4g/kg	=>300mg/l	=>50mg/l	“contains liquorice – people suffering from hypertension should avoid excessive consumption



Additional General Requirements



- >10% Added Polyols
 - Bulk sweeteners
 - “Excessive consumption may produce laxative effects”
- Aspartame
 - “contains a source of phenylalanine”



Additional General Requirements



- Caffeine present in a drink >150mg/L
 - ‘High Caffeine Content x mg/ml’
 - Same field of vision as the name.
 - Excludes Tea and Coffee

CARBONATED FRUIT FLAVOUR STIMULATION DRINK

INGREDIENTS - CARBONATED WATER, SUGAR, CITRIC ACID, TAURINE, FLAVOURINGS (INCLUDING CAFFEINE (0.03%)), ACIDITY REGULATOR (SODIUM CITRATES), GLUCURONOLACTONE, INOSITOL, COLOURS (SULPHITE AMMONIA CARAMEL, CARMOISINE), VITAMIN B6, RIBOFLAVIN, VITAMIN B12; PRESERVATIVE: SODIUM BENZOATE
HIGH CAFFEINE CONTENT (30mg/100ml)

- NOT SUITABLE FOR PERSONS SENSITIVE TO CAFFEINE



Additional General Requirements



- Foods containing Azo Dyes
 - Artificial Food Colours
 - Drinks with >1.2% ABV exempt

Sunset yellow (E 110) (*)	'name or E number of the colour(s)': may have an adverse effect on activity and attention in children.
Quinoline yellow (E 104) (*)	
Carmoisine (E 122) (*)	
Allura red (E 129) (*)	
Tartrazine (E 102) (*)	
Ponceau 4R (E 124) (*)	



Additional General Requirements



- Mixed fruit, vegetables or mushrooms
 - Proportions likely to vary
 - No one ingredient predominates
 - Can be listed under generic name “fruit”, “vegetables” or “mushrooms”
 - Followed by “In Variable Proportions” AND list of fruits, vegetables or mushrooms
- Only applies to these ingredients



PROTECTED DESIGNATIONS



Protected Designations



- Relate to origin & descriptions
- PDOs
- PGIs
- TSGs
- EU law intended to protect origin and ingredients of specific products

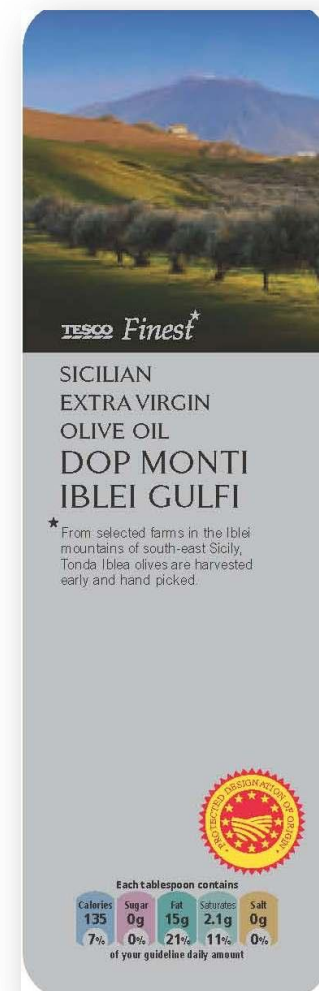




Protected Designations



- Can only use Name of registered product if meets criteria in application
- Cannot use terms such as “style” in conjunction with registered name
- Translation of Registered Names also covered
- Applies to ingredients





Protected Designations



Areas to watch

- Feta Cheese – Registered PDO
- Parmigiano Reggiano (Parmesan) – Italian PDO
- Cornish Pasty – Published PGI (EU)
- Lincolnshire Pork Sausages – Published (UK)
- Edam Holland – Registered PGI
- <http://ec.europa.eu/agriculture/quality/door/list.html>



ADDITIVE LABELLING



Additives



- List by Category Name
AND
- Specific Name or E Number or Both
 - Colour: Annatto; or
 - Colour: E160b; or
 - Colour: Annatto E160b





Additives



- Only EU approved additives permitted
- Specific law covering
 - Foods in which no additives permitted
 - Additives for specific food groups
 - Maximum levels for specific additives
 - How additives should be declared



Additives



- Additive Category names:

Acid	Colour
Acidity Regulator	Emulsifier
Anticaking Agent	Emulsifying Salts
Antifoaming Agent	Firming Agent
Antioxidant	Flavour Enhancer
Bulking Agent	Flour Treatment Agent
Gelling Agent	Propellant Gas
Glazing Agent	Raising Agent
Humectant	Stabiliser
Modified Starch	Sweetener
Preservative	Thickener



Additives



- Additive Categories Cont...
 - No other category names permitted
 - Based on primary function of the additive
 - Could serve more than one purpose
 - “What is it there for?”, “Why am I adding it?”



Additives



- Food additives banned
 - in unprocessed food
 - Sweeteners and colours in food for babies and small children, unless included in Community list.
 - Member States prohibit use of certain categories of food additives in traditional foods produced on their territory.





Additives



- Declare if:
- Functional in finished product but must consider allergen implications
- Consider Carry Over
 - Additive levels within ingredient
 - Number of additives present in final product may exceed levels



Additives



Fruit juices and nectars as defined in Directive 93/71/EEC	E 300	Ascorbic acid	<i>quantum satis</i>
	E 296	Malic acid	3 g/l
	E 330	Citric acid	5 g/l
	E 270	Lactic acid	5 g/l

Specific Categories

Max Amounts

Food Business chooses appropriate category



Additives



- New regulations
- Feature new lists of additives
 - 1331/2008 – Authorisation of Additives
 - 1332/2008 – Food Enzymes
 - 1333/2008 – Colours, Sweeteners and Miscellaneous Additives
 - 1334/2008 - Flavourings



Additives



- Flavouring Substances
 - Approved List in force 22/4/2013
 - Can be sold through until 22/10/2014
- Enzymes
 - applications sought for new list creation
- All other additives
 - applies from 1st June 2013



Additives



- “Natural” flavourings
 - Hierarchy for use of term “Natural” with flavourings
- "Natural xxx flavouring"
 - 95% of the flavouring component obtained from the source material
 - "Natural strawberry flavouring"



Additives



- "Natural xxx flavouring with other natural flavourings"
 - Flavouring component partially derived from source material
 - Contains other natural flavourings:
 - "Natural strawberry flavourings with other natural flavourings"



Additives



- "Natural flavouring"
 - Flavouring component derived from different source materials
 - Reference to source materials would NOT reflect flavour or taste
 - Apricot Kernel flavouring = almond taste in Marzipan flavour cakes
- "Flavouring"
 - No natural quantification = artificial



Additives



- Processing Aids are NOT covered by the Additives Regulations
- No requirement to list processing aid in ingredients declaration
 - However, if allergen
 - Must declare allergen presence
- Must meet all criteria



Additives



- Processing Aids cont...

Not consumed as food ingredients by themselves, and

Intentionally used during processing

Fulfil technological purposes during treatment or processing and

Unintended but technically unavoidable presence of residues in finished products, and

Residues do not present any risk to human health, and

Residues do not have technological effect on the finished product



Additives



- Case Study
 - Fish cakes with 0.02% Rosemary Extract E392
 - 95/2/EC states 150mg/kg – Fish Products
 - Means
 - 150mg per 1000g; or
 - 0.15g per 1000g; or
 - 0.015g per 100g; or
 - 0.015% in product
 - Above permitted levels

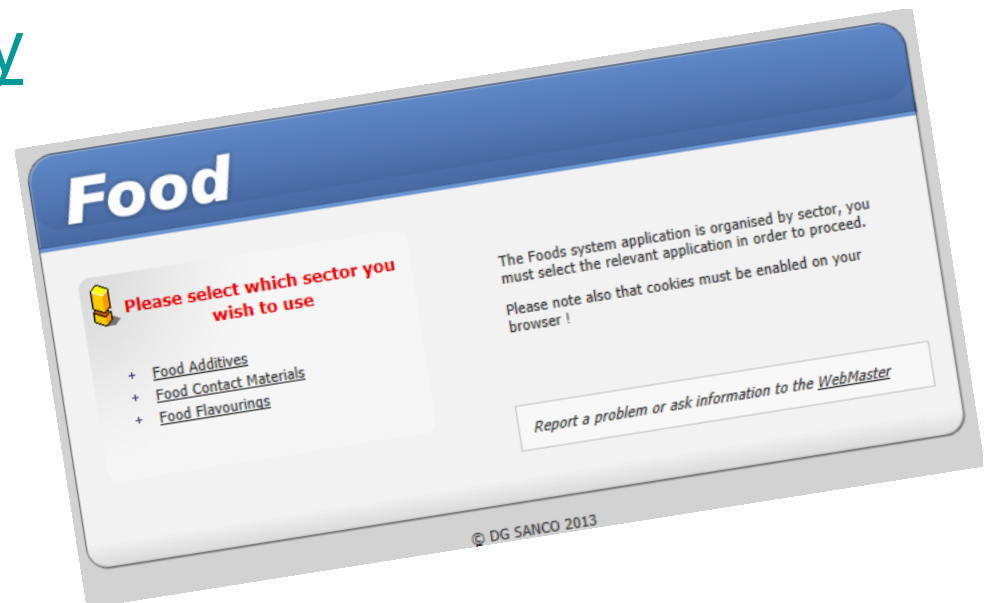




Additives



- From June 2013
 - New EU Additives database
 - Free online access
 - https://webgate.ec.europa.eu/sanco_foods/main/?event=display





GENETICALLY MODIFIED (GM) FOODS LABELLING



GM Foods Labelling



- The Regulations
 - EU REG (EC) 1830-2003 22.09.2003
Traceability & Labelling
 - EU REG (EC) 1829-2003 22.09.2003 GM
Food & Feed



GM Foods Labelling



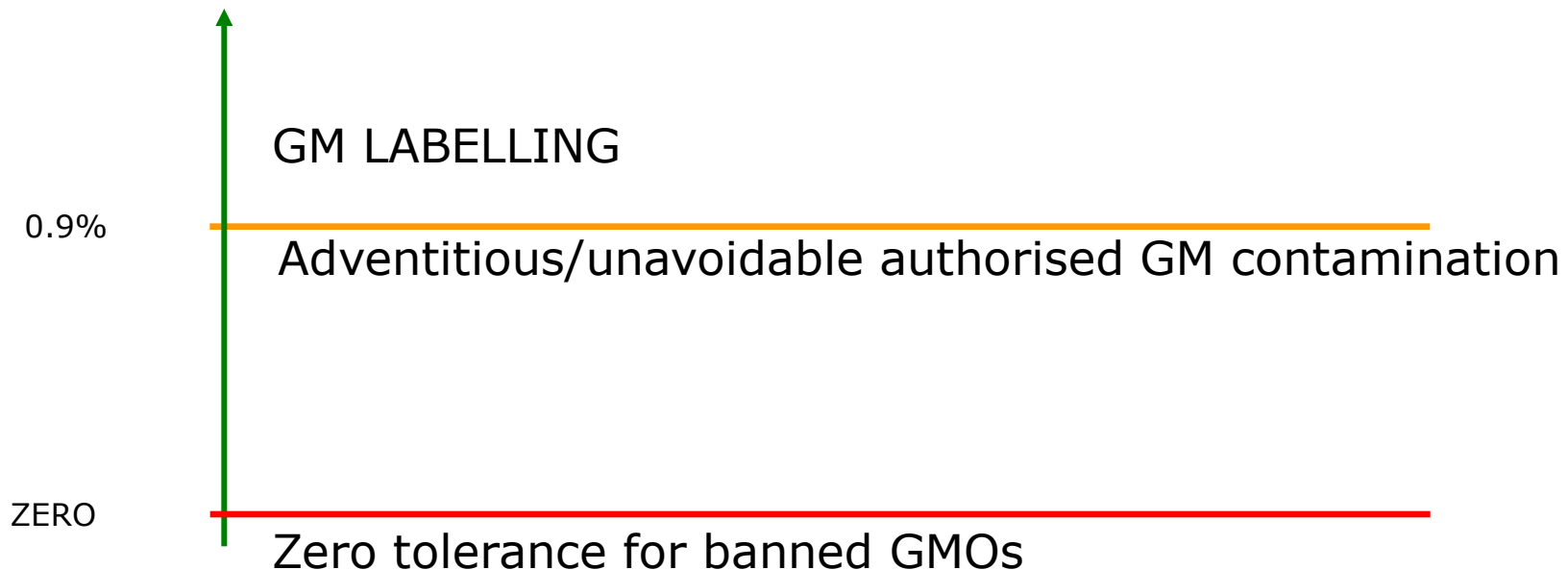
- Thresholds
 - 0.9 % threshold
 - Adventitious or technically unavoidable authorised GMO contamination
 - Does not include products derived from animals fed GM diet (e.g. eggs, milk, meat)



GM Foods Labelling



- GM Labelling Thresholds

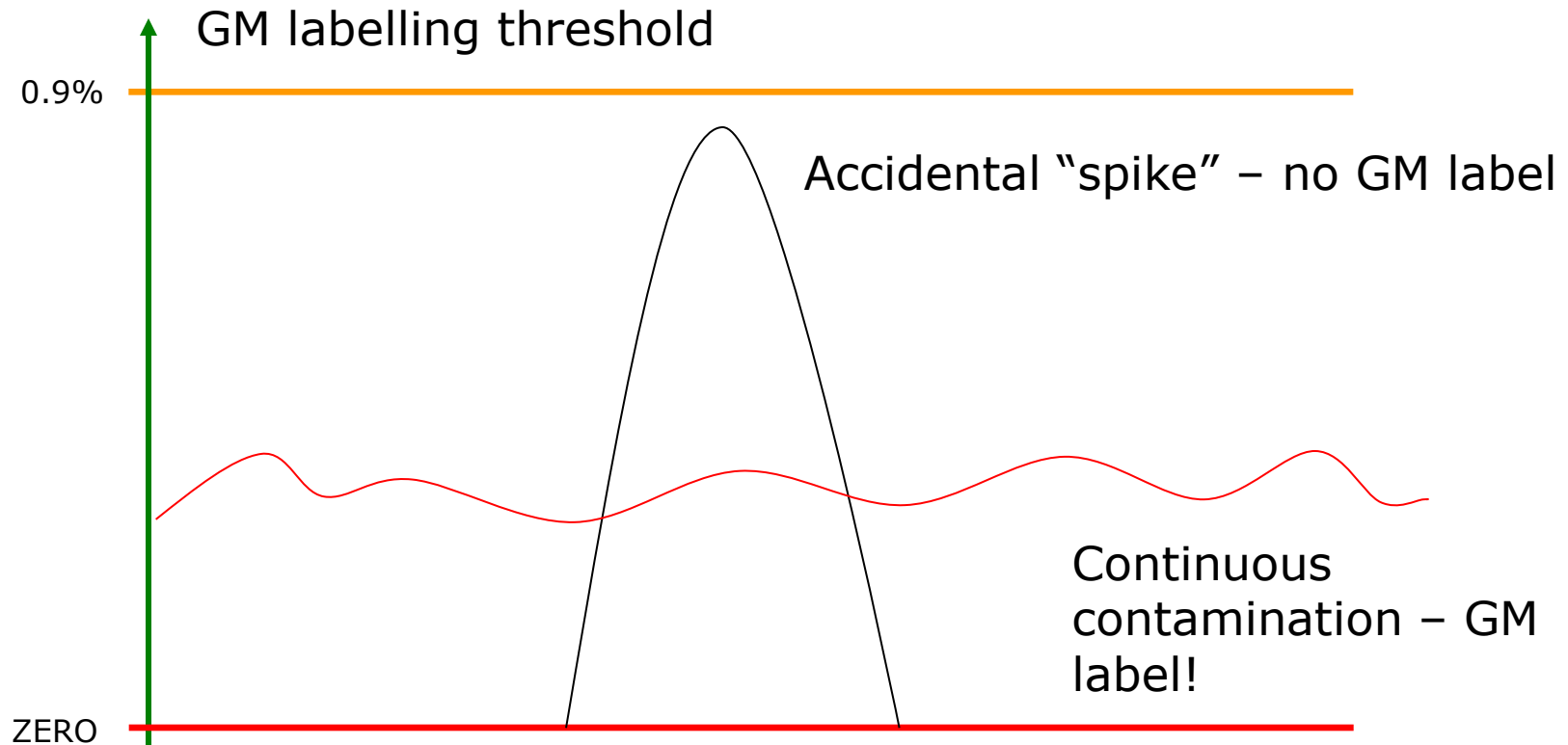




GM Foods Labelling



- What does “adventitious, technically unavoidable contamination” mean?

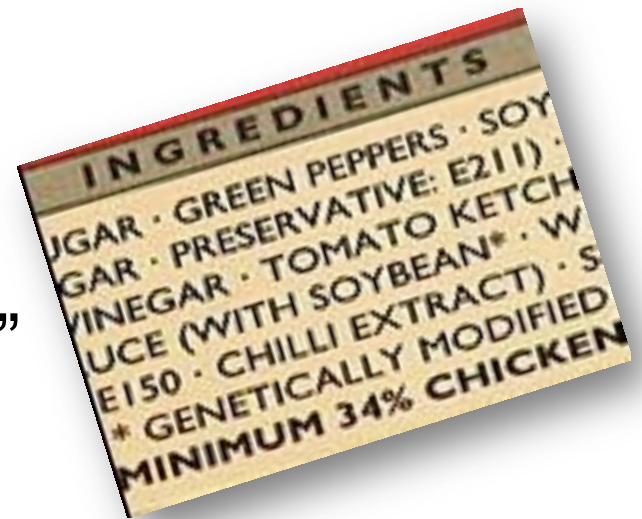




GM Foods Labelling



- Foods consist of more than one ingredient:
 - “Genetically Modified”, or
 - “produced from Genetically Modified [name of ingredient]”
 - Listed in ingredients
 - No ingredients – appear clearly on labelling





GM Foods Labelling



- Current Commercially Available GM commodities:

Cotton	Flax/ Linseed	Maize/ Corn
Papaya	Rapeseed/ Canola	Rice
Soya	Squash/ Pumpkin	Sugar Beet
Tomato		



LOT MARKING



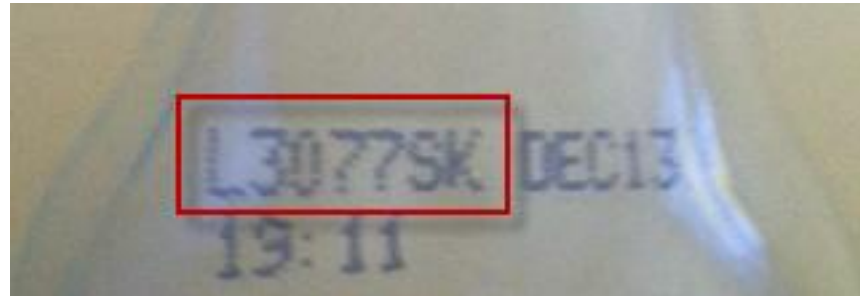
Lot Marking



- Directive 2011/91/EC
- Lot Mark
- Batch / Sales Unit
- Ability to trace product based on code
- Exemption if Durability Date on pack
 - Must be able to trace from date



Lot Marks



- L = Denotes Lot Mark
- 3 = Year
- 077 = Day 77 of the year
- Produced 77th Day of 2013 or
- **Monday 18th March 2013**



BEEF LABELLING



Beef Labelling



- 1760/2000/EC
- Labelling of Beef
- Enable beef to be traced to origin
- Fresh or frozen beef or veal



Beef Labelling



- Compulsory and Approved Additional Information
- Covers raw beef only:
 - Carcases, Quarters, bone in or out, joints, steak, dice, mince (<1% salt); and
 - Uncooked beef burger patties with no other ingredients added
 - CN Codes 0201, 0202, 0206, 1095 and 2991



Beef Labelling



- Labelling applies throughout the supply chain
- Labelled with:
 - Reference Number/Code
 - Born in: Country Name
 - Reared In: Country Name
 - Slaughtered In: Country Name
 - Cutting/Cut in: Country Name

Allows animal(s)
to be traced



Beef Labelling



- Born in and Reared In:
 - Can only be one country
 - “Born in: Thailand; Raised in: Thailand”
- Slaughtered In, Cut In:
 - Country; and
 - Reference Number for Slaughterhouse and Cutting Plant

EU Imports need a minimum of “Origin: Non-EC” and “Slaughtered in: [Name of Country]”



Beef Labelling



- Approved Information
 - Breed / Cross Breed
 - Age / Gender
 - Production Method (Grass-Fed, Non-GM Fed)
 - Slaughter Method (Halal)
 - Date of Slaughter
 - Method/length of Maturation
- Approved by Member State before use



Beef Labelling



- Information that doesn't require approval:
 - Any general mandatory Labelling (Session 1)
 - Health Marks
 - Organic labelling
 - Kosher labelling
 - PDO and PGI products



Beef Labelling



Label for retail (pre-packed):

British Beef
08/07/07/324694/1 – reference number/code
Sirloin Steak
Weight 600 grams
Price £3.00
Unit Price £5.00/Kilo
Aberdeen Angus sired
Origin: UK
Slaughtered in: UK (1234)
Cutting in (or Cut in): UK (5678)

BOLD = Mandatory
ITALIC = Approved

Label for mince:

British minced beef
08/07/07/346248/2 – reference number/code
Farm Assured
Weight 1 Kilo
Price £4.75
Minced in: UK
Slaughtered in: UK

Where all animals from which the minced beef is derived were born, raised and slaughtered in the UK.



FISH LABELLING



Fish Labelling



- Similar to Beef Labelling
- 104/2000/EC, 2065/2001/EC, 1224/2009/EC and 404/2011/EC
- Information relating to:
 - Commercial Designation
 - Production Method
 - Catch Area



Fish Labelling



- Applies to:

Live Fish	Fresh, Chilled & Frozen Fish
Fish Fillets & other Fish Meat	Dried, Salted or Brined Fish
Smoked Fish (hot or cold smoked)	Crustaceans (not cooked and peeled)
Molluscs (not cooked)	



Fish Labelling



- Commercial Designation
 - Specific Species
 - Applies to all fish and fish products
 - Atlantic Salmon = “*Salmo salar*”
 - River Cobbler = “*Pangasiidae*”





Fish Labelling



- Production Method
 - How fish harvested
 - Caught at sea/in fresh water
 - “caught” or “caught in freshwater”; and
 - FAO Catch Area Name “Indian Ocean”
 - Aquaculture
 - “Farmed” – Fished; or
 - “Cultivated” – Shellfish; and
 - Country of Farming

Country of
final
development



Fish Labelling



- More than 1 country of farming?
 - Indicate each country
- Mixed species in package
 - All information for each species separately



COMPOSITIONAL REQUIREMENTS



Compositional Requirements



- Use of certain terms covered by EU Law
- Reserved Descriptions
- Must meet minimum compositional criteria when used



Compositional Requirements



- “Meat” Definition
 - Generic name “Pork”, “Beef”, “Lamb”, “Chicken” etc. used
 - Limits for Fat and Connective Tissue
- Mixture of meats from more than one species
 - Indicate percentages per species



Compositional Requirements



- Meat continued...
 - Can't include:
 - Heart, Tongue, Head Muscles (not cheeks), Carpus, Tarsus, Tail
 - Must not exceed “naturally occurring levels”

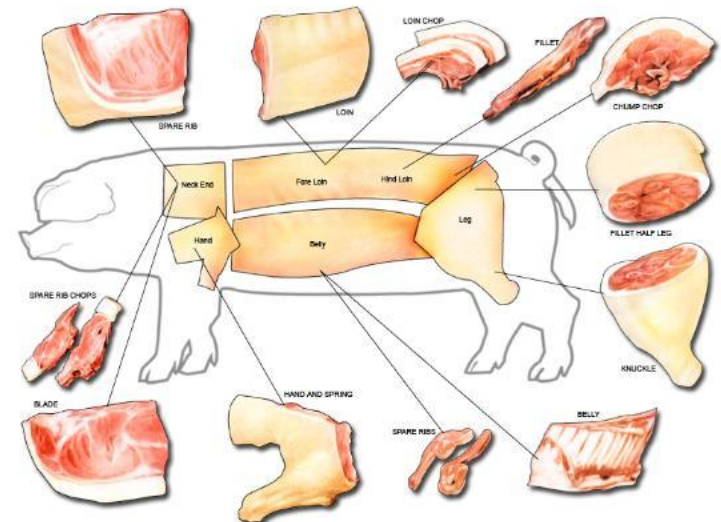
Species	Fat (%)	Connective tissue (%) ¹
Mammals (other than rabbits and porcines) and mixtures of species with mammals predominating	25	25
Porcines	30	25
Birds and Rabbits	15	10



Compositional Requirements



- Meat continued...
 - If using the name of a specific cut, limits of fat and connective tissue don't apply
 - Pork Belly
 - Lamb Shoulder
 - Beef Loin
 - Meat protein is **NOT** meat
 - Used as a filler





Compositional Requirements



- Meat continued...
- Maximum limits exceeded
 - “....meat” content adjusted downwards
 - Presence of fat and/or connective tissue indicated
- MRM - “mechanically recovered meat”
 - excluded from this definition.



Compositional Requirements



- Olive oil
 - Chocolate
 - Jams
 - Coffee
 - Milk
 - Sugars
- 
- A collection of various chocolate candies, including heart-shaped, round, and square pieces, some with decorative patterns or embossed designs, arranged in a pile.
- Many as a result of CMO Regulations



Compositional Requirements



- Fruit Juices and Nectars
 - Distinction between juice obtained
 - Direct from fruit
 - Reconstitution
- Minimum BRIX levels for certain juices
- Reserved Descriptions



Fruit Juice

Fruit Juice from
Concentrate

Fruit Nectar

Concentrated Fruit Juice

Dehydrated/Powdered Fruit
Juice



Compositional Requirements



- Cocoa and Chocolate Products
 - Specific types of vegetable fat permitted
 - Reserved Descriptions covering
 - Cocoa Solids
 - Cocoa Fat
 - Milk Solids
 - Dry Non-Fat Cocoa Solids
 - Chocolate, Milk Chocolate, Cocoa, Cocoa Powder all protected





Compositional Requirements



- Many more requirements
- Apply to products & named ingredients

Honey

Jam & Similar Products

Supplements

Coffee and Chicory

Condensed & Dried Milk

Baby Foods & Milk

Quick Frozen Foods

Spirit Drinks

Drinking Milk

Mineral, Spring and
Drinking Water

Caseins & Caseinates



LABELLING EXAMPLES



Labelling Examples



362g Must be 4mm High

Atlantic Salmon Burgers Must be "salmo salar" species

ORIGINAL Original - first recipe and unchanged over time

8 MINUTES COOKING TIME

No BBQ Instructions provided

No Frying Instructions provided

PRODUCT OF CANADA

280	15.0g	3.8g	11.3g	0.3g
16%	24%	21%	14%	5%
CALORIES	FAT	SATURATES	SUGARS	SALT

OF YOUR GUIDELINE DAILY AMOUNT

UNCOOKED
KEEP FROZEN
SERVING SUGGESTION

FOR BEST BEFORE END SEE SIDE OF PACK



Labelling Examples



A great way to enjoy Atlantic salmon from the cold waters of Canada sustainably sourced and responsibly farmed in a and delicious sau

Must have evidence

Energy actually 868kJ

POACHING INSTRUCTIONS

- Cook From Frozen
- Place inner pouch in boiling water and continue to boil for 17 mins or until fully cooked.
- Remove salmon from the pouch and serve.

MICROWAVE INSTRUCTIONS (800W OVEN)

- Cook from frozen
- Remove outer package
- Pierce top of pouch and place in a microwaveable dish
- Microwave on defrost setting for 7 mins or until defrosted
- Cook for 2 – 3 mins full power or fully cooked
- For other wattages - adjust times accordingly

No Omega 3 claim on pack

Nutritional Information

	per 100g	per 140g serving
Energy	867kJ/208kcal	1214kJ/291kcal
Fat	13.3g	18.6g
of which saturates	3.1g	4.3g
omega 3	1.8g	2.5g
Carbohydrate	3.5g	4.9g
of which sugars	2.7g	3.8g
	18.6g	26.0g
	0.97g	1.36g

Allergen Warning

Contains milk, wheat and gluten



No Health Mark Provided

Should be "Lemon Juice From Concentrate"

Should state "Wheat Flour"

Percentage of Atlantic Salmon missing

INGREDIENTS:

ATLANTIC SALMON (GLUTEN), CHIVES, SALT, CHIVE & GARLIC SAUCE (MILK SOLIDS (MILK), LEMON JUICE, GARLIC, FLOUR)

Salmon skin on filets. Small bones may remain.

Must be physical address, email not sufficient

DISTRIBUTED BY:-
DJM FOOD SOLUTIONS LTD
INFO@DJMFOODSOLUTIONS.CO.UK



SUMMARY



Summary



- Additional requirements for different products
- Specific additive labelling
- Use of reserved descriptions will trigger compositional requirements
- Important to monitor GM presence for “at risk” foods
- Unsure? Ask for advice