SALSA
Safe and Local Supplier Approval

SALSA Requirement:
1.12.1 *"Procedures shall be in place to ensure all product labelling fully conforms to legislative and, where specified, customer requirements."*
1.12.2 "There shall be appropriate documented controls to ensure that the correct labelling is applied to product."

Why?

There are legal requirements for how you declare the information on a product label or how you supply information to your customers for non labelled/bulk products. Incorrectly labelling product can be a serious issue especially where wrongly or undeclared allergens are involved. Incorrectly labelled products can also lead to costly product recalls or withdrawals and damage to your reputation.

Tools

- Reliable sources of up-to-date advice/information on Labelling regulations
- Raw material specifications for all your ingredients
- Finished product specifications/recipes for all products
- Consider using a SALSA Mentor or other external Technical Consultant, if you are unsure

Tips

- Familiarise yourself with the general labelling requirements for your product types
- Attending a SALSA Food Labelling workshop will help you to meet this Requirement
- Check your labels carefully before you print - and ask someone to check your check. Labels are a costly item to get wrong – for your pocket and your reputation.
- Review your labels if you change recipe/ingredient/or ingredient supplier
- Don't copy a label for a similar product on sale without then checking against your ingredients/recipe
- You will need to provide information on your website when distance selling *ie* online sales
- Don't forget to check your customer requirements – and ensure any requests meet the law

What do I need to do?

- Write a procedure that details what steps you take to ensure your products' labels are meeting the legislation which applies to your products.
- The main labelling requirements are covered by the Food Information to Consumers Regulation EU No. 1169/2011 but you should be aware of other legislation affecting labelling of your products. Regulations require that:
  - label descriptions match the product
  - nutrition information is correctly presented
  - product claims are accurate and true
  - ingredients listings are correct and understandable by consumers
  - quantity is correctly applied
  - allergens are emphasised in the ingredients listing
  - customer storage/cooking/preparation/instructions and shelf-life are applied

- You should also be aware of other legislation affecting labelling. Please note: in this Guidance we cannot possibly include all the information you would need to refer to, and the checking of food labels is generally recognised as a specialist job requiring specialist knowledge. You are therefore not expected to have this knowledge within your business but you should know where to go to obtain it and where/when to use it.
- Some Local Authorities offer a label checking/review service as part of their Trading Standards department but this may not be available in all regions. Your professional body or trade association may offer assistance with labelling as part of your membership.
- To generate labelling information, it is best to create a document specifying the steps to follow to ensure all legal requirements are checked and fulfilled.   See the example below.
- Ask your label printer to send you through a proof so you can check again before printing - and re-check if amends are made! It is useful to have a second pair of eyes look over the proofs at an early stage.
- Keep a reference copy of all your labels/outer packaging, with their completed checklist, and know what recipe each label applies to *ie* link it to your finished product specifications. In instances where recipes are liable to change, it can be helpful to add a code in small typeface to a label that relates to that particular recipe.
- You also need a procedure to ensure the correct label goes on the correct product and any online printing *eg* date code is correctly applied. (1.12.2). Consider:
  - Adding a check to your packing records and keeping a copy of the label/ date code applied to that run of products to demonstrate the labels are correct.
  - Ensure these copies are signed and dated by a senior member of staff to confirm the correct labels have been applied to the correct product.
  - You may want to keep labels from start and end of runs (or more frequently if you are producing large runs of products).

Example

- The list below is a guideline for the main points to consider for food labelling, and applies mainly to packaged foods.
- You should refer to the relevant sections in legislation to determine which of the following are needed for your particular products and/or category – there are exemptions and different requirements for wholesale, foodservice, non- pre-packed foods, vending machines food *etc*.
- Also use this list to create a document to generate your own labels and a sheet to check and sign off the artwork created by you/your printers. As an insurance, it is worth having 2 people to check each label before printing.
- **Remember:** if in doubt, consult one of the recommended sources of advice shown below.
- <u>Don't</u> take any chances or risks and <u>don't</u> just copy another company's label from a product similar to yours – they may have got it wrong or your products may not be exactly the same.

- **Product title, name of the food/ description and visual representation**
  - Will there be a full secondary description?
  - Does the image accurately show the product?
- **Minimum durability marking**
  - Is it: Best Before, Best Before End or Use By?
  - Where will you show it? Have you verified it?
  - Is date of freezing required?
  - Additional traceability code required?
- **Ingredients list**
  - Are the ingredients listed in the correct order? *ie* highest to lowest ingredient quantities.
  - Have you broken down compound ingredients? *eg* chocolate, seasonings
  - Have you included QUID [Quantitative Ingredients Declaration] if relevant?

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

Need more help?

- See *Tools & Tips* for 1.4.3 Allergen Control; 1.14 Shelf life
- **Guidance Notes** for 1.4.3 Allergen Control (for a list of EU allergens), 3.4.3 Labelling Claims
- SALSA recognises this is a specialist area and that legislation is continually evolving. SALSA offers:
  - One-day Food Labelling Workshops: guidance, updates & advice on food labelling requirements, and practice in producing labels.   Held regionally; discounted rate for members. See website for details.
  - Locally-based SALSA-approved Mentors