

Labelling guidance

Guidance for meeting 848



Below are details of the areas of regulation where there are differences/changes required for labelling. This document is designed as an initial overview. We are awaiting some further clarification from Defra and will produce detailed guidance in due course.

1. EU logo & Statement of Agriculture

EU logo and the associated statement of agriculture will be compulsory on prepacked product (retail packed). Its use is voluntary on non-prepacked product.

Statement of agriculture requires identification of the ingredient's origin as either EU or Non-EU, or from a specific country, or a country and a region country. Provided at least 95% of the ingredients originated there. This is less strict than the GB regulation, which allows up to 2% only.

Once the SPS agreement comes into effect, the UK Statement of Agriculture mandatory under GB retained regulation 834/2007 will no longer be required.

2. Additives & flavourings included in the product percentage calculations

Flavourings and an increased number of additives are included in the product percentage calculations.

This may mean some companies will have to amend specifications and labels to comply.

3. Identification of flavourings

We are awaiting confirmation from Defra on interpretation of the regulation on how flavourings used as ingredients must be identified on retail labelling.

4. Products with ingredients of hunting and fishing

Products with ingredients of hunting and fishing can make reference to organic in the sales description and in the list of ingredients, provided that:

- (i) the main ingredient is a product of hunting or fishing;
- (ii) reference to organic in sales description is clearly related to another ingredient which is organic and different from the main ingredient;

For example: Mackerel in Organic Tomato Sauce.

This is different from GB regulation which only allows reference to organic in the same visual field as the sales description and in the ingredients list.

All other requirements regarding labelling are the same as GB regulation.

5. In-Conversion labelling

Less prescriptive than GB regulation in terms of wording permitted.

‘In-conversion’ or corresponding term (similar/equal) together with terms referring to organic. E.g ‘in-conversion to organic’; ‘In-conversion to organic production’.

All other requirements regarding labelling of in-conversion are the same as GB regulation.

6. Will NI retain a different certification body code from GB?

We are awaiting confirmation from Defra on this.

7. Will there be a transition period for amending labelling?

We are awaiting confirmation from Defra on this. We understand this forms part of the negotiations.

8. Pet Food Labelling

There are rules regarding using organic terms on labelling of pet food and product composition, which will require changes to existing product labelling and composition. Contact us for full details of labelling and composition requirements for pet food.

9. Use of the words ‘bio’ and ‘eco’ on organic products

2018/848 states that a product is regarded as being labelled as ‘organic’ where the labelling, advertising or documentation refers to organic production, or uses one of the terms in the Annex to the Regulation or “their derivatives or diminutives, such as ‘bio’ and ‘eco’, alone or combined”. These terms may not be used in labelling a food or animal feed product that is not certified organic. This will not affect certified organic products, but if, for example, you produce a conventional yogurt and label it as ‘Bio Live’ or ‘Bio Yoghurt’, the regulation would apply to that product.

10. FBO address

Defra have informed us that under the agreement, it is expected businesses will be able to use a UK or EU food business operator address when marketing food for the Great Britain, Northern Ireland or EU markets. This simplifies the current rules, where food marketed in Great Britain requires a UK food business operator address, and food destined for the EU or Northern Ireland requires an EU or Northern Ireland address.