

# Food labelling beyond EU borders

**Sarah Howarth** looks at the contribution of UK food and drink products to overseas trade. She considers some of the export challenges facing the UK after Brexit with a focus on the CODEX food labelling standards.

## Food and drink exports and imports

In the wake of Brexit, many more businesses are seeking export opportunities to grow beyond EU borders. Currently the UK is a net importer of food and drink, estimated to be just under 80% self-sufficient.

Total exports to the EU stood at 47% in May 2017. Over the past 18 months, the amount exported to the EU has ranged from 38 to 51% with EU imports over the same period ranging between 46 and 56% <sup>(1)</sup>. Let us not get into the argument of who needs who most.

During 2015, food and drink contributed just under 4% of total

export trade. Table 1 shows the top 10 food and drink products exported from the UK with whiskey appearing a clearer leader<sup>(2)</sup>. Many of these items appear to be premium and high value with a stable shelf life.

It is surprising that food and drink appears to be such a low overall contributor to total export trade. In their everyday lives, consumers often take for granted that many of the products they use on a daily basis are not made in the UK. Why are food and drink export levels so low from the UK's largest manufacturing sector?

Some of the challenges with exporting food and drink products

TOP 10 PRODUCTS				
	2016 (m)	Change		
		Value (m)	% Value	% Volume
Whisky	£4095.3	£153.2	3.9%	5.5%
Chocolate	£663.4	£79.2	13.5%	7.7%
Beer	£595.4	£89.1	17.8%	10.0%
Salmon	£579.2	£81.7	16.4%	-9.3%
Cheese	£498.8	£49.4	11.0%	7.7%
Wine	£490.1	£49.6	11.2%	-14.0%
Gin	£475.0	£53.0	12.5%	10.6%
Beef	£446.8	£16.8	3.9%	1.4%
Soft drinks	£427.8	£47.7	12.6%	0.6%
Wheat	£369.2	£123.9	46.7%	49.2%

Table 1 Top 10 food and drink products exported from the UK in 2015



LABEL INFORMATION	CODEX STAN1-1985 REQUIREMENT?	EU FIC REGULATION REQUIREMENT?	COMMENTS
Name of the food	✓	✓	CODEX states that where a name/ names have been established for a food standard at least one of these names shall be used.
List of Ingredients	✓	✓	CODEX does not require compound ingredients to give a breakdown when less than 5% in the product. This does not include additives with a technological function in the product. <i>NOTE: EU FIC Regulation Annex VII Part E does not require a breakdown less than 2% (this does not apply to food additives)</i>
Allergens	✓	✓	CODEX: There are 9 which need to be declared. <i>EU FIC Regulation Annex II There are 14 adding Molluscs, Lupin, Sesame, Mustard, Celery</i>
Added water	✓	✓	CODEX: Added water must be declared as an ingredient unless it forms part of an ingredient such as brine, syrup or broth used in a compound ingredient need not be declared. <i>EU FIC Regulation Annex VII added water above 5% in the finished product must be declared, excluding meat and fish products.</i>
Refined fats and oils other than olive	✓	✓	CODEX: Does not require specific origin to be declared unlike <i>EU FIC Regulation Annex VII Part A</i> with the exception of pork fat, lard and beef fat.

Table 2 Comparison of mandatory information that must be present on the label between CODEX STAN1-1985 and EU FIC

can include:

- Likelihood of success?
- Market research
- What will customers find appealing?
- Food labelling and marketing presentation
- Understanding the retail environment
- Having the right contacts
- Logistics
- Food safety and regulatory standards
- Language
- Shelf life
- Customer support
- Consumer communication
- Interaction with government agencies
- Trade tariffs.

One of the key challenges is clear product presentation that meets market regulation and standards as well as being appealing to the consumer. The food label is often the primary source of communication between the producer and consumer at the point of sale. As the UK seeks to increase its export trade beyond EU borders, the global foundation for food labelling, CODEX Food

labelling guidelines<sup>[3]</sup>, will become increasingly important by comparison with the more familiar EU FIC Regulation for food labelling.

### CODEX Food Labelling guidelines

The CODEX guidelines are published as a reference to safeguard public health whilst facilitating free trade at a global level. The fifth edition of CODEX Food Labelling guide includes sections on:

- Pre-packaged goods
- Food Additives, when sold as such
- Claims on pre-packaged goods for special dietary uses
- Guidelines on claims
- Nutritional labelling
- Use of Nutrition and Health claims
- Use of the term 'Halal'

The EU FIC Regulation predominantly applies to pre-packaged foods that bear labels, so it is useful to explore further the implications of CODEX for UK food manufacturers of pre-packaged foods wishing to trade outside the EU.

### General standard for the labelling of pre-packaged foods (CODEX STAN1-1985)

Table 2 shows the mandatory information that must be present on the label according to CODEX STAN1-1985 and EU FIC. Bearing in mind that the CODEX STAN1-1985 section on pre-packaged foods consists of 10 pages and the EU FIC Regulation is 63 pages, the table is very much a summary highlighting additional CODEX requirements. By sheer volume of paper, it is clear that the EU regulation is significantly more prescriptive in its approach.

Much of the 10-page CODEX document has been incorporated into the current European regulation, with the few exceptions detailed in Table 2.

### Standard for nutritional labelling on pre-packaged foods (CODEX CAC/GL-2-1985)

Nutritional labelling on pre-packaged foods (CODEX guidelines on nutritional labelling CAC/GL-2-1985) became a mandatory requirement in December 2016. A comparison with the EU regulation is included in Table 3.



As with the CODEX standard for pre-packaged foods, much of the CODEX nutritional labelling guidelines has been adopted into the familiar EU FIC regulation.

**Conclusions**

As technical managers, it is very easy to become UK centric and rely on the information sources close to home, which have become familiar. CODEX standards and specifications can often be a helpful starting point in the hierarchy of food safety standards and regulations.

Life might be simpler if we all followed the CODEX food label, but we are well beyond that stage and there is no turning back. The EU FIC Regulation has already evolved and extends to 63 pages.

The global trend appears to be a move toward mandatory nutrition labelling. The Codex guidelines were amended in 2012 to recommend that nutrition labelling should become mandatory, even in the absence of health claims. Many countries that had a voluntary approach to nutrition labelling have in recent years adopted measures to make this mandatory.

Businesses seeking to grow through export trade should be sure to check that they meet the food safety standards and regulations for the destination market.

CODEX is often a useful starting

Table 3 Comparison of mandatory nutritional information that must be present on the label between CODEX STAN1-1985 and EU FIC

point followed by the specific country rules. It is important to check who is responsible for what, with written terms for clarification to help avoid nasty surprises and expensive border delays.

**CODEX standards and specifications can often be a helpful starting point in the hierarchy of food safety standards and regulations.'**

LABEL INFORMATION	CODEX CAC/GL-2-1985 REQUIREMENT?	EU FIC REGULATORY REQUIREMENT?	COMMENTS
Mandatory nutritional information when making a Health Claim	✓	✓	
Mandatory nutritional information on pack	✗	✓	CODEX: Voluntary on pack
Guidelines for the nutritional information	Energy, value, protein carbohydrate excluding dietary fibre, fat	✓	EU FIC Regulation Annex XV
Vitamin and mineral declarations	✓	✓	CODEX: Amounts less than 5% NRV per 100g/100ml cannot be declared. EU FIC Regulation Annex XIII higher levels of % RI must be present to allow declaration on pack: 15% RI foods; 7.5% beverages per 100g/100ml

References and article available online at: [www.fstjournal.org/features/31-3/food-labelling](http://www.fstjournal.org/features/31-3/food-labelling)

**Sarah Howarth** BSc Hons, C Sci, FIFST, member of IFST Scientific Committee, is an experienced food professional with 30+ years' experience within the food industry. After having worked for a number of international companies including Unilever, Yum Brands (Pizza Hut; KFC), Cargill, Cott Corporation and Marks & Spencer, she set up independently to support companies with their Food Safety Compliance. She has a keen interest in food and drink labelling, supporting local, national and international companies with labelling compliance advice. Sarah is a member of the SALSA food labelling course development and delivery team.  
**Email:** sarah.howarth@howarthfoodsafety.co.uk  
**Web:** <http://www.howarthfoodsafety.co.uk/index.php>