

## CLEAR FOOD LABELLING

### Introduction

The Agency's research and public consultations have confirmed that many consumers find food labels difficult to use.

In January 2001 the Agency established a Task Force with a wide range of expertise, experience and interests to advise on what it might do to improve the clarity of food labels. The Task Force recognised that best practice advice such as this would have only limited effect on imported foods. It considered, however, that UK guidance could have a wider influence by encouraging adoption of EU guidance. The Agency will press for development of such advice.

The Task Force identified three areas of difficulty

- finding information,
- reading it, and
- understanding how to use it,

and made recommendations to tackle each of these issues. It drew on existing guidelines, particularly those published by the Institute of Grocery Distribution (IGD) on print size and clarity.

The Task Force recognised that products necessarily come in all shapes and sizes and that their labels cannot be expected to conform to a single ideal format. Its approach was to develop an ideal format which can be used on most products, supplemented by a "second best" to be used where size and/or shape precludes use of the ideal. It also recognised that some specialist products, such as medical foods, have unusually large nutrition panels where the ideal format might not be achievable.

The following advice is firmly based on the Task Force's recommendations and additional information provided during public consultation. Recommendations made by the Task Force aimed at improving advice to consumers about using and understanding the information provided on food labels will be taken forward separately.

# CONTENTS

	Paragraphs
Grouping information on the label	1 - 7
Format of nutrition labelling	8 - 10
Format of date marking	11 - 12
Allergens: presentation of ingredient listing information	13 - 16
Print size and clarity	17 - 34
Increasing the printable area on pack	35
Contact details for further information	36 - 37
Annex	

## BEST PRACTICE ADVICE

### Grouping information on the label

1. Group together the information that consumers need to make informed purchase decisions and use food safely. Either do this on any single face of the pack with a defined border, or in the same field of vision on the pack.
2. This information consists of:
  - Name of the food;
  - Net weight or volume, where required;
  - List of ingredients;
  - Date mark, or a reference to where it can be found;
  - Nutrition information;
  - Instructions for use and/or storage; 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 its value to those with visual impairment.

3. Where it is not possible to group the information listed in paragraph 2 together as described in paragraph 1, group it separately as follows and provide signposts 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.

#### **Group A**

- Name of the food
- Net weight or volume, where required
- Date mark, or a reference to where it can be found
- Storage instructions
- Alcoholic strength, where appropriate

#### **Group B**

- List of ingredients;
- Nutrition information
- Use instructions

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

4. When grouping items as recommended in paragraphs 1 and 3, bear in mind that other statutory information may also need to be given with it (e.g. declarations about the presence of sweeteners, GM, or indications of irradiation).
5. Only use signposting (directing consumers to look elsewhere on the label for information) where absolutely necessary. Make sure the wording of the signpost

is clear and, if signposting more than one item of information, try to put all the signposted material in the same place.

6. Do not give health marks or lot marks unnecessary prominence or emphasis, as this may tend to mislead, for example as to the origin of the food.
7. Do not hide, obscure or interrupt essential information with any other written or pictorial matter.

### **Format of nutrition labelling**

8. Although the law only requires nutrition information when a nutrition claim is made, it is of increasing interest to consumers. Some consumers find the format prescribed in law for both voluntary and compulsory labelling difficult to use.
9. The IGD has issued advice on ways of improving the presentation of this information within the current rules.
10. It is recommended that the IGD's advice on nutrition labelling should be followed<sup>1</sup>.

### **Format of date marking**

11. Make sure that the date information given as part of the "best before" or "use by" date mark is clear and unambiguous. Until and including the year 2012, there is scope for consumers to confuse day/month indications as indications of month/year (for example, 08.03 could be taken by consumers to mean 8<sup>th</sup> March or August 2003).
12. Where possible, express the "best before" or "use by" date as day/month/year. Where day/month or month/year combinations are permitted and are used, spell out the month in words (either in full or as an abbreviation – eg Jan, Mar, Aug, Dec) rather than numbers in order to avoid confusion.

### **Allergens: presentation of ingredient listing information**

13. Ingredient listing information should always include the following major food allergens, or products derived from them that may also cause problems, where they have been used in the manufacture of the food. Do not take advantage of exemptions for compound ingredients, carryover additives or processing aids for these ingredients<sup>2</sup>:

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<sup>1</sup> The Clear Labelling Task Force discussed ideas for improved formats, which are now being consumer tested.

<sup>2</sup> Comprehensive ingredient listing along these lines will be required in EU legislation if a proposal currently under discussion in Brussels is adopted.

- Peanuts;
- Tree nuts (almond, brazil, cashew, chestnut, hazelnuts, macadamia nuts, pecan, pine nuts, pistachio, walnut);
- Sesame seeds;
- Cows' milk;
- Egg;
- Fish;
- Crustacea, molluscs, shellfish;
- Soya;
- Sulphite (in concentration of 10mg per kg or more);
- Cereals containing gluten (wheat, barley, oats, rye, spelt or their hybridised strains).

14. Use simple language, drawing on the list at paragraph 13 above, for example using “milk protein” instead of “casein”. The IGD has issued useful advice detailing how to do this<sup>3</sup>, which is reproduced in the Annex to this advice.

15. Devices that draw attention to allergens to make product selection easier for sufferers and their carers can be helpful, particularly if a consistent approach is adopted. If you choose to use a separate allergy information/alert panel, we recommend a “contains” box placed next to the ingredients list.

16. Where a separate allergy information alert panel is used, refer consumers to the ingredient list for more detailed information about the composition of the product and the presence of particular allergens.

### **Print size and clarity**

17. Do not hide, obscure or interrupt product information with any other written or pictorial matter. Make sure that all product information is easily visible and clearly legible.

18. Ideally use a font size of 10 point for the essential information in paragraph 8 wherever possible. If this is not possible, the absolute minimum for this information should be 8 point.

19. Where it is necessary to consider which information to give in 10 point and which 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 10 point and as much of the other information as is possible.

20. Where packs are physically too small, or of a shape which cannot support 10 point type size, it is paramount to address other factors. These will include

- ensuring that non-essential information doesn't take up unnecessary space,

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<sup>3</sup> Voluntary Labelling Guidelines for Food Allergens and Gluten – ISBN 1 898044 72 4

- the number of languages used,
  - the type colour and font, and
  - the layout of the label.
21. Use simple sans serif fonts with a good “x” height and avoid ornate fonts or distracting effects, like shadowing.
  22. Use the normal weight of the font for standard text, and bold for emphasis.
  23. Do not use all upper-case letters or underlining for emphasis.
  24. Only use italics for isolated words – do not use them for large blocks of text, or for small font sizes.
  25. Use the “range left” format, and avoid hyphenation and justified text.
  26. Print essential information in black type on a white background. If this is not possible, make sure there is a good tonal contrast between the type (which should be dark) and the background (which should be light).
  27. Avoid “reversing out”, except possibly for headings in a large font size (at least 12 point). In any event, only use it for white type on a black background.
  28. Do not place images behind text (“watermarking”).
  29. Avoid the use of green and red together – it can be difficult to decipher. Strong colours work better than pastel shades.
  30. Be careful when wrapping text around images – it can be difficult to read. In any case, always make sure the left-hand edge of the type is kept straight, and that wrapping the text doesn’t produce a line length that only consists of two or three words.
  31. Metallic and shiny surfaces make reading difficult. Try to use a matt-finish printing surface.
  32. Simple icons can help direct consumers to information (“signposting”). This can be particularly useful for cooking instructions (for example, pictures of a frying pan, oven and microwave). But make sure the icons will be easily recognisable.
  33. It is important to ensure that numerals are distinct. The numbers 0, 3, 5, 6 and 8 can easily be misread in certain typefaces.
  34. Adopt a consistent format when presenting information like nutrition labelling on a range of products to make it easier for consumers to identify and locate.

### **Increasing the printable area on pack**

35. Give the essential information described in paragraph 2 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.

## CONTACT DETAILS FOR FURTHER INFORMATION

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

Food Labelling and Standards Division – Room 115B  
Food Standards Agency  
Aviation House  
125 Kingsway  
London  
WC2B 6NH

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E-mail: [labelling@foodstandards.gsi.gov.uk](mailto:labelling@foodstandards.gsi.gov.uk)

37. For further information in the devolved administrations, please contact

In Wales: Food Standards Agency Wales  
1<sup>st</sup> Floor, Southgate House  
Wood Street  
Cardiff  
CF10 1EW

Tel: 029 2067 8911  
Fax: 029 2067 8918/8919  
E-mail: [wales@foodstandards.gsi.gov.uk](mailto:wales@foodstandards.gsi.gov.uk)

In Scotland: Food Standards Agency Scotland  
St Magnus House  
6<sup>th</sup> Floor  
25 Guild Street  
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10C Clarendon Road  
Belfast  
BT1 3BG

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**Examples of recommended ingredient names for consistent identification of the presence of food allergens and gluten**

<b>Term</b>	<b>Recommended ingredient name</b>
<b>Permitted generic names</b>	
(vegetable) oil/fat	Specify vegetable source
Crumbs or rusks	Specify cereal source
Flour	Specify cereal source
Starch	Specify cereal source
<b>Common names</b>	
Casein; Caseinate; Caseinate salts; Sodium Caseinate	Milk proteins
Whey protein	Milk proteins
Whey	Whey (from milk)
Whey powder	Whey powder (from milk)
Whey sugar	Whey sugar (from milk)
Whey syrup	Whey syrup (from milk)
Hydrolysed whey	Hydrolysed whey (from milk)
Albumen	Egg albumen
Glaze	Glaze (egg); Glaze (milk)
Hydrolysed vegetable protein	Specify vegetable source, eg Hydrolysed soya protein
Groundnut	Peanut
Monkey nuts	Peanuts
Arachis	Peanut
Stock	Specify when made from a food listed in paragraph 19
Tahini	Sesame-tahini
Houmous	Sesame-houmous
Satay	Peanut-satay
Pesto	Pesto containing pine nuts/cheese
Miso	Soya miso
Tempeh	Soya tempeh
Tofu	Soya bean curd
Omega 3 fatty acids	Omega 3 fatty acids (from fish oil)
Breadcrumbs	Specify cereal source
Couscous	Couscous (wheat)
Semolina	Semolina (wheat)
Spelt flour	Spelt (wheat) flour
Modified starch	Specify source

Source: IGD - Voluntary Labelling Guidelines for Food Allergens and Gluten (ISBN 1 898044 72 4)