

Take Time To Write the Label:

By Jennifer Jones

Meeting the United Kingdom's label requirements is a must. Not only is it the law, but proper labeling helps "translate" your product. U.K. consumers will be more likely to try a new U.S. food if they can recognize and understand its label. Use labels so your product's first impression on the U.K. consumer is the right one.

If you use a food name in a product description, be sure the flavoring is mainly derived from that food. Otherwise, use the word "flavour"—and remember that spelling. Moreover, an illustration representing the flavor of the food may appear only if that flavor is derived mainly from the food depicted—hence no strawberries on this can. A dish of ice cream with sauce is shown instead.

Imported goods must be clearly marked, indicating their country of origin.



The name of the food, or a description, must be clearly stated. Identifying the product's trade name, "Strawbrite," is not enough. The company must clearly distinguish its product from similar ones—say "strawberry pie filling."

Labels must be printed with British spelling. That means "colour," "flavour" and other subtle Briticisms—watch out for them!

The term "serving suggestion" is not illegal, as long as it doesn't mislead about the nature of the product. This is ice cream sauce, so the picture works fine.

Keep it short and sweet.

- A product with permitted sugars and sweeteners should have a label that says "with sugar" or "with sweetener."
- A product containing aspartame must state "contains a source of phenylalanine" on the label.
- A product with more than 10 percent polyols (a class of sugar-free sweeteners including sorbitol) should state, "excessive consumption may produce laxative effects."

A Guide for U.S. Exporters

The United Kingdom has a regulation known as PARNUT—or Foodstuffs for Particular Nutritional Purposes. Foods falling under PARNUT must follow special labeling rules. First, nutrients should be expressed in measurements of per 100 grams or 100 milliliters—**do not use** the U.S. language which typically says “per serving.” Second, nutritional labeling is compulsory with these foods. Give nutritional information and specify what in the manufacturing process gives the food its special nutritional or dietary-related characteristics.

If the food is prepared for a special group of people, the label must describe how the product would serve their needs. Health claims based on such relationships as sodium and hypertension, fresh produce and cancer avoidance, and calcium and osteoporosis avoidance are not allowed.



Write Your Label Right...

All food or food ingredients containing genetically modified (GM) soybeans or corn must be clearly labeled, under a U.K. regulation that became law in 2000. However, ingredients obtained from GM crops but which themselves do not contain novel DNA or protein do not have to be labeled.

For example, snacks made entirely from whole, roasted GM soybeans would need to say so on the label. If the snacks were made from flour that might have some GM soy or corn in them, they would probably not.

The United States uses Universal Product Codes (UPC) with 12 digits and the United Kingdom uses an Electronic Article Number (EAN) with 13 digits. The good news is, U.S. bar codes work perfectly in the United Kingdom, since the EAN system was designed around the UPC.



If a special emphasis is placed on a particular ingredient—as in this example, soybeans—the amount of the ingredient, as a percentage, must be next to the name of the food or near the name of the ingredient in the ingredient list. This requirement is enforced by the EU Directive on Quantitative Ingredients Declaration or QUID. QUID does not apply, however, to things that are naturally present in foods—such as caffeine in coffee or vitamins in fruit juice.

Net quantities of prepackaged foodstuffs must be given in metric units. Imperial equivalents can be added as well, but the metric measure must come first. Note that no pluralizing “s” follows the metric abbreviation, even though it is 10 grams of product.

... for U.K. Export Success

A statement of minimum durability is required. In the case of highly perishable foodstuffs, such as yogurt, the words "use by" should precede the expiration date printed as the day, month and year. For products that need to be consumed within six weeks, the label should read, "sell by..." followed by the day and month. For foods with a shelf life of less than three months, use the words "best before" with day and month. For foods with a shelf life of more than three months, use "best before end..." followed by month and year only.

Questions? The United Kingdom's Food Standards Agency has published guidelines at www.foodstandards.gov.uk

There must be an address on the label for product return. It can be the address of the manufacturer, packer or seller and it can be a U.K. company or one in the United States. Just be sure to include one.

These are only a few examples of labeling requirements in the United Kingdom. For more details, check FAS' GAIN report UK1030, available online at http://www.fas.usda.gov/itp/ofsts/fairs_by_country_results.asp?Cn
Contact FAS' United Kingdom office at the address below.

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Any special storage conditions or conditions of use should be stated. Instructions for use should be given, if needed.