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# *Food labelling*

Edited by J Ralph Blanchfield, MBE



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**J. Ralph Blanchfield, MBE**



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## **Food labelling**

# Editor's foreword

A food label may literally be a label – a piece (or pieces) of printed paper attached to a food package – or it may comprise all or part of the printed or lithographed exterior surface of the package. In either case, it consists of a finite area to carry what needs to be meaningful (and, therefore, legible and intelligible) information. Different 'stakeholders' require the label to do different things. There is thus considerable 'competition' for the available space.

Through its legislators, the country for which the product is destined determines certain information that the label must include, and in what form.

The manufacturer of the product, through his/her marketing managers and creative label designer, wants the label primarily to help sell the product in preference to competing products. This purpose is sometimes pursued with little or no reference to legal requirements, sometimes sailing as close to the wind as possible. At the same time, the manufacturer, advised by his/her technical manager, regulatory affairs manager or consultant, also needs to ensure that the label complies with the law. This may lead to internal competition, not only for space but about what is written and how it is presented, usually – but not always – resulting in a compromise that meets both requirements.

Compliance with labelling legislation is by no means a straightforward process. Labelling regulations are themselves in a virtually continuous state of evolution, often changing with a transition period during which the old regulations and the new ones exist simultaneously. Compliance sometimes involves requirements stated in more than one location; for example, general requirements in horizontal legislation, and particular requirements in vertical legislation affecting the class of products. Moreover, compliance very often involves interpretation of how requirements relate to the particular circumstances of the product.

For the regulatory agency and the analyst, the label provides an essential part of the data required for checking that compositional and labelling regulations are being met. For both the manufacturer and the regulatory agency, the label provides the indispensable means for traceability of products in the event of need for withdrawal or recall.

For consumers, the label provides the essential means of informed choice when purchasing: the means of identification of what is in the package, of what it consists, what quantity, how to store it (and for how long) and how to prepare and use it.

Consumer organisations look for more, and more easily understood, information on labels. For some consumer activists, no amount of information provided appears to satisfy the *Oliver Twist*-like call for 'More'. But what about the mass of consumers for whose benefit the label is primarily intended?

If one is to believe the message of many consumer surveys, the majority want detailed label information but few use it, many because they do not fully understand it, particularly nutrition information. Few are said to understand the meaning of percentages – even when expressed as quantity per 100 g; or the significance of kilojoules (kJ); or that the kcals on a label are actually the 'calories' that dieters confidently count. Very few relate sodium on a label to the salt about which they hear health messages, or realise that 0.4 g of sodium per 100 ml on an EU food label (say, soup), equals 1 g of salt in 100 ml, which in turn means 2.5 g salt in a good-sized cup of the soup.

Beyond nutrition information lies the topic of health claims. This has long been a grey area in respect of labelling of health foods. As knowledge increases about the relationship between diet and health, research and development give rise increasingly to food products designed to provide positive health benefits. Many consumers will wish to know, and many manufacturers will wish to tell them, about the health merits (or supposed merits) of particular food products, sometimes on the basis of evidence far short of what would legally be required in a medicine. At what point does a health claim on a label become a medicinal claim? Indeed, are the marketing-invented terms 'functional foods' and 'nutraceuticals' convenient euphemisms for 'medicinal foods'? In the absence of adequate labelling measures that are required to satisfy an independent body of experts on the scientific validity of the evidence for efficacy and safety, how is the consumer to be given useful information while being protected from the modern equivalent of the old-time snake oil salesman?

Clearly, if consumers are to utilise information on labels, there is a need for a major education effort to enable them to appreciate the significance of what they read there. It is, however, difficult to see how the label can be the education medium. This needs to be provided by other means and through other media.

'What do they read there?' This raises several problem areas. In the era of global marketing, and of the internal European market, the same product with the same label may be marketed in several countries and will need to carry information in several languages. Multi-ethnicity in a single country may also necessitate several languages. This, of course, intensifies the competition for the label 'real estate' previously noted.

Even the keenest-sighted of consumers would have difficulty in reading the extremely small print of some ingredients lists or nutrition information tables, particularly if the print is not on a strongly contrasting background. This problem can be partly alleviated with better label design, but there remains the dilemma that the more information that has to be crowded onto a finite area, the more difficult it will be to read.

How much more difficult it is for the partially sighted to 'read what is there' and how impossible for the blind. Efforts to find ways of solving the latter problem have resulted in a technically successful solution which so far cannot be put into practice.

The last decade has seen new labelling needs. The advent of genetically modified foods and irradiated foods has necessitated the development of new labelling provisions to facilitate informed consumer choice. The belated recognition by legislators and industry that food allergy, though affecting a minority of the population, can be life-

threatening, and is a major food safety issue, has led to measures in manufacture, and, as regards labelling, to the need for label warnings about the presence, or potential presence, of major food allergens.

These are the main issues that are discussed in detail by the specialist authors of the various chapters, in terms not only of present problems and requirements but also of possible future developments. The latter are important because any book on a topic that is the subject of food legislation is to a considerable extent a 'snapshot in time'; and nowhere is that truer than of food labelling. This book is a unique and valuable compilation on all aspects of the subject and should prove helpful to legislators, regulators, marketeers, label designers, food technologists, consumer organisations and perhaps even individual consumers.

**J. Ralph Blanchfield**



# Contributors

## Chapter 1 Introduction

### *Section 1.1 Key issues*

Dr David Jukes

Department of Food Science

University of Reading

Whiteknights

Reading RG6 2AP

England

Tel: 01189 318700

Fax: 01189 310080

E-mail: [food@afnovell.reading.ac.uk](mailto:food@afnovell.reading.ac.uk)

### *Section 1.2 Consumer needs*

Professor Christine M. Bruhn

Center for Consumer Research

University of California

One Shields Avenue

Davis

California 95616

USA

Tel: (530) 752 2774

Fax: (530) 752 3975

E-mail: [cmbruhn@ucdavis.edu](mailto:cmbruhn@ucdavis.edu)

### *Section 1.3 Manufacturers' needs*

Mr Michael Hunt

Scientific Regulatory Affairs Division

Food and Drink Federation

6 Catherine Street

London WC2B 5JJ

England

Tel: 020 7836 2460

Fax: 020 7836 0580

E-mail: [michael.hunt@fdf.org.uk](mailto:michael.hunt@fdf.org.uk)

### *Section 1.4 Legislators' perspectives*

Ms Denise Love

50 St Peter's Street

London N1 8JT

England

Tel: 020 7359 1049

### *Section 1.5 An enforcement perspective*

Mr David Walker

Oxton Hall Lodge

Holyhead Road

Bicton

Shrewsbury SY3 8BW

Tel: 01743 254101

Fax: 01743 254114

## Chapter 2 Labelling requirements: European Union

Ms Denise Love

50 St Peter's Street

London N1 8JT  
England

Tel: 020 7359 1049

### **Chapter 3 Labelling requirements: United States**

Dr John E. Vanderveen  
Food and Drug Administration  
Center for Food Safety and Applied  
Nutrition  
200 C Street  
SW (HFS-300)  
Washington DC 20204-001  
USA

Tel: (202) 205 4066  
Fax: (202) 205 4422  
E-mail: [jvanderv@bangate.fda.gov](mailto:jvanderv@bangate.fda.gov)

### **Chapter 4 Declaration of ingredients and additives: European Union**

Ms Dorothy Flowerdew  
Consultant – Technical Food Laws  
8 Broomhurst Court  
Ridgway Road  
Dorking RH4 3EY  
England

Tel: 01306 886626  
Fax: 01306 886626  
E-mail:  
[d.flowerdew@foodlaw.demon.co.uk](mailto:d.flowerdew@foodlaw.demon.co.uk)

### **Chapter 5 Declaration of ingredients and additives: United States**

Dr Ronald H. Schmidt  
Department of Food Science and  
Nutrition  
University of Florida  
Gainesville  
Florida 32611-0370  
USA

Tel: (352) 392 1991  
Fax: (352) 392 9467  
E-mail: [rschmidt@GNV.IFAS.UFL.EDU](mailto:rschmidt@GNV.IFAS.UFL.EDU)

### **Chapter 6 Durability indication: European Union**

Ms Angelika Mröhs  
Bund für Lebensmittelrecht und  
Lebensmittelkund e.V.  
Godesberger Allee 142–8  
53175 Bonn  
Germany

Tel: (49) 228 819930  
Fax: (49) 228 375069  
E-mail: [amrohs@bll-online.de](mailto:amrohs@bll-online.de)

### **Chapter 7 Durability indication: United States**

Dr Robert A. LaBudde  
824 Timberlake Drive  
Virginia Beach  
Virginia 23464-3239  
USA

Tel: (757) 467 0954  
Fax: (757) 467 2947  
E-mail: [ral@lcfltd.com](mailto:ral@lcfltd.com)

### **Chapter 8 Nutrition information: European Union**

Ms Lynn Insall  
Food and Drink Federation  
6 Catherine Street  
London WC2B 5JJ  
England

Tel: 020 7836 2460  
Fax: 020 7836 0580  
E-mail: [lynn.insall@fdf.org.uk](mailto:lynn.insall@fdf.org.uk)

### **Chapter 9 Nutrition information: United States**

Dr Tracy Altman  
550 North Kingsbury Street  
Apt 314  
Chicago  
Illinois 60610-4060  
USA

Tel: (312) 494 9483  
Fax: (312) 494 9583  
E-mail: [taltman@professionalfluency.com](mailto:taltman@professionalfluency.com)

## **Chapter 10 Nutrition and health claims: European Union**

Mr Peter Berry Ottaway  
Berry Ottaway and Associates Limited  
1a Fields Yard  
Plough Lane  
Hereford HR4 0EL  
England

Tel: 01432 270886  
Fax: 01432 270808  
E-mail: [berry.ottaway@dial.pipex.com](mailto:berry.ottaway@dial.pipex.com)

## **Chapter 11 Nutrition and health claims: United States**

Professors Mary K. Schmidl and  
Theodore P. Labuza  
Department of Food Science and  
Nutrition  
University of Minnesota  
1354 Eckles Avenue  
St Paul  
Minnesota 55108  
USA

Tel: (612) 624 9701  
Fax: (612) 483 3302  
E-mail: [tplabuza@tc.umn.edu](mailto:tplabuza@tc.umn.edu)

## **Chapter 12 Special issues in food labelling**

### *Section 12.1 Good design in food labelling*

Ms E. Jane Whiteley  
IGD  
Grange Lane  
Letchmore Heath  
Watford WD2 8DQ  
England

Tel: 01923 857141  
Fax: 01923 852531  
E-mail: [igd@igd.org.uk](mailto:igd@igd.org.uk)

### *Section 12.2 Multi-language requirements*

Jean-Paul Kern  
Mars Incorporated

McLean  
Virginia  
USA

Tel: +32 2 647 06 60  
Fax: +32 2 647 11 24  
E-mail:  
[sonia.hilton@lovellwhitedurrant.com](mailto:sonia.hilton@lovellwhitedurrant.com)

### *Section 12.3 Food allergen labelling*

J. Ralph Blanchfield MBE  
17 Arabia Close  
Chingford  
London E4 7DU  
England

Tel: 020 8524 1800  
Fax: 020 8523 9945  
E-mail: [jralphb@easynet.co.uk](mailto:jralphb@easynet.co.uk)

### *Section 12.4 Genetically modified foods and ingredients*

Dr Michelle Sadler  
IGD  
Grange Lane  
Letchmore Heath  
Watford WD2 8DQ  
England

Tel: 01923 857141  
Fax: 01923 852531  
E-mail: [igd@igd.org.uk](mailto:igd@igd.org.uk)

### *Section 12.5 Irradiated foods and ingredients*

Professor G.W. Gould  
17 Dove Road  
Bedford MK41 7AA  
England

Tel: 01234 262576  
Fax: 01234 222277

### *Section 12.6 Label problems for blind and visually impaired people*

J. Ralph Blanchfield MBE  
17 Arabia Close  
Chingford  
London E4 7DU  
England

Tel: 020 8524 1800  
Fax: 020 8523 9945  
E-mail: *jralphb@easynet.co.uk*

### **Chapter 13 Determining shelf-life**

Mr Dominic Man  
School of Applied Science  
South Bank University  
Southwark Campus  
103 Borough Road  
London SE1 0AA

Tel: 020 7815 7900  
Fax: 020 7815 7999  
E-mail: *mandc@sbu.ac.uk*

### **Chapter 14 Instructions for storage and use**

Professor Keith Anderson  
341 Reigate Road

Epsom Downs KT17 3LT  
England

Tel: 01737 210086  
Fax: 01737 358238  
E-mail: *keith@profanderson.demon.co.uk*

### **Chapter 15 The role of traceability in food labelling**

Mr Cliff Morrison  
Technical Director  
UB Frozen and Chilled Foods Limited  
Ross House  
Wickham Road  
Grimsby DN31 3SW  
England

Tel: 01472 365950  
Fax: 01472 365170  
E-mail: *cliff\_morrison@biscuits.com*

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