

Into The Light

Guidance Notes for outer case labelling of
manufacturers' branded frozen food service
supply chain



British Frozen Food Federation
A GUIDE TO GOOD PRACTICE

First published December 2002
Revised May 2016

Foreword from BFFF

With the expansion of the infrastructure of the foodservice supply chain, the industry is constantly needing to seek efficiencies in its' operations. For some time, it has been considered that an area in the frozen food supply chain which would benefit from enhancement is the labelling of outer cases for branded and bespoke products, where the wholesaler/distributors and the catering end users have been experiencing problems and inefficiencies in order selection.

Some manufacturers are already operating to excellent standards in this area but BFFF wholesalers' research indicated that an unacceptably high percentage of outer cases in the foodservice supply chain were so inadequately labelled as to seriously affect order picking efficiency, both in cold stores and on the delivery vehicles.

With its unique cross-section of membership, BFFF has been able to focus in this area. Wholesalers were able to formulate a practical standard of good practice which would meet their needs and then agree the specifications with the representatives of the producer sector. The following publication is intended to provide guidance for branded and bespoke frozen products in the foodservice supply chain but does not cover own label foodservice products or retail products.

Thanks are due to the many BFFF members who have contributed to this and earlier versions of this document.

Contents

Chapter	Section Heading	Page
	Foreword	2
	Checklist	4
	Introduction	5
	Labelling Best Practice - Overall Principles	7
1	Product Name	8
2	Best Before Date	11
3	Freezer Storage Instructions	13
4	Name & Address of Manufactuer/Seller/ Distributor	13
5	Premises Identification Number/Health Mark/Country of Origin	14
6	List of Ingredients & Quantitive Ingredient Declaration	15
7	Allergen Information	16
8	Nutrition Information	17
9	Instructions for Use	18
10	Quantity Declaration	19
11	Batch Code/Lot Code/Production Code	21
12	Country of Origin	24
13	Bar Coding	25
14	Position of Labels or Pre-Printing Position	26
15	Clarity and size of Label of Pre-Printing on Outer Case	27
16	Handling Instructions	29
17	Strength & Appropriateness of Packaging Materials	30
18	Pallet Configuration	31
19	Other Legal Labelling Requirements	32
	Annex 1	33

All Articles referred to in this guidance are in
Food information for Consumers Regulation (EC) No 1169/2011

Checklist for Labelling of Outer Cases For your use

1. Name of Product	L
Variety / grade detail)	
Supplier Code) where relevant	
2. Best Before Date / Best Before End	L
3. Freezer Storage Instructions	L
4. Name and Address of Manufacturer / Seller / Distributor	L
5. EC Number / Approval Mark	L*
6. Ingredients List and Quantitative Ingredient Declaration	L*
7. Allergen Information	L*
8. Nutrition Information	L*
9. Instructions for Use	L*
10. Net Quantity Declaration	L*
11. Batch Code / Lot Code / Production Code	L*
12. Country of Origin	L*
13. Bar Coding	A
14. Position of Labels or Pre-Printing Position	A
15. Clarity and Size of Label or Pre-Printing on Outer Case	A
16. Handling Instructions	A
17. Strength and Appropriateness of Packaging Materials	A
18. Pallet Configuration	A

L - Legal (mandatory) requirement

L* - Legal (mandatory) requirement, depending on nature of 'saleable unit'

A - Advisory (Good Practice)

Introduction

These Guidance Notes are intended to address problems experienced in the cold store/distribution supply chain and to facilitate easy and accurate picking of orders by the wholesaler/distributor. The Guidance Notes are intended to be a general guide to labelling of foodservice products. They concentrate on issues specifically related to outer case labelling as they impact on efficient order picking and delivery and, if followed, will also assist the business in ensuring that outer case labelling is legally compliant.

The Guidance Notes are intended to cover both manufacturer branded products and 'bespoke' products where the 'wholesaler' is providing a third-party distribution service (e.g. for a national catering group). Although the guidance is not intended to cover: wholesaler own-label products (where it is assumed that the wholesaler has sufficient control to specify outer case labelling that will satisfy their requirements); nor to retail products or business to business trade for further processing; they can be used in these instances in the absence of a customer specific policy for outer case labelling.

Good practice and mandatory labelling requirement

The labelling of foodservice products must comply with all relevant national and European legislation. The principal legislation is the Food Information Regulations 2011, although there are many other regulations that also directly affect product labelling. Where the outer case is the 'saleable unit', the legislative requirement will generally apply directly to the outer case. The Food Information Regulations apply to food intended for delivery both to the final consumer and to the caterer.

Some aspects of the Guidance Notes provide recommendations for 'good practice' and are denoted by an 'A' as advisory; In other areas they are dealing with mandatory requirements arising from legislation, in particular Regulation (EU) No 1169/2011 on the provision of food information to consumers. However under different circumstances, the legal requirement for outer case labelling will differ.

If prepacked product is supplied, all of the mandatory information (denoted by 'L' or 'L*') must be provided to the wholesale customer or caterer but there are several ways in which it can be given.

The full mandatory information can be printed on the outer case, or be on an attached label; alternatively it can be provided in a specification or in commercial documents, as long as these can be guaranteed to accompany the delivery or be supplied in advance of delivery.

If full mandatory particulars are included in a specification or in commercial documents, the legal requirement for labelling of the outer case is limited to those particulars denoted by an 'L' i.e.:

- the 'Name of the food'
- the Durability date
- Storage instructions i.e. 'keep frozen'
- the Name and Address of the Business Operator responsible for providing the food information
- if it is a product of animal origin from an approved premises - the health mark or approval number of the premises

Where the outer cases contain multiple packs of prepacked product that can be divided and sold individually to caterers or consumers, full mandatory particulars must be provided on each of the individual packs. The labelling of the outer case can be limited to the 4/5 items listed above

Where the outer case is a single 'saleable unit' in itself that is not appropriate for or intended for dividing, and where full mandatory information is provided in a specification or commercial document, the labelling of the outer case can be limited to the 4/5 items listed above

Note however where the outer case is a single 'saleable unit' not intended for dividing and is in the form intended to be marketed direct to the consumer, as is; all of the mandatory details appropriate to the food – denoted with 'L' and 'L*' must be marked on the label or outer case, regardless of whether a specification or information via commercial documentation has been provided.

Where foods that are not prepacked i.e. loose are supplied, different labelling rules apply. If supply is direct to the caterer, only allergen information is mandatory (Article 44).

If supply of non prepacked food is intended for a caterer (or consumer) but is supplied B2B all mandatory food information must be provided to enable, when required, that business to provide the appropriate mandatory information to the consumer.

It is vital that specification information can be guaranteed as accurate for each delivery consignment, therefore unless robust controls are in place that can guarantee a specification or commercial document remains current, full labelling of the outer case may be the most appropriate approach to ensure that food supplied to the caterer meets the legal obligation to ensure correct and accurate food information is provided 100% of the time.

Labelling Best Practice - Overall Principles

As a minimum requirement, labels or pre-printing for key information should be on two adjacent sides, i.e. one short and one long side. Key information in this regard is the product name and the supplier product code (where used), and should include, where relevant, variety or grade detail, and/or case content information.

Other information need appear only once on the case, preferably on a long side panel.

The labelling of the name of the product in a manner that results in efficient identification of the product is of vital importance to the operations of a distributor's cold store.

These Guidance Notes identify key information which should be shown as a minimum on two adjacent sides of the outer case; other information should appear once. In line with advice from GS1 UK regarding printed bar codes, the key information should, be included on a short side of the case and the adjacent long right hand side.

Various product attributes can be important in the marketing of individual products - GM, Organic, Vegetarian, Vegan, Halal, Kosher, Protected Geographical Indications 'Country of Origin', MSC and Fair Trade et al. Some of these are subject to legal requirements, others to other 'controls', or to official guidance - all of which must/ should be complied with as appropriate. It is not the purpose of these Guidance notes to provide detailed information in these areas, but as it may facilitate trade, consideration should be given to whether it is useful to provide such information on the outer case.

- Clarity and legibility of label or pre-printing are of prime importance in cold store conditions to ensure the efficient identification and handling of outer cases. It is essential that there is good contrast under conditions of artificial light between the colour of the background and the colour used for printing (whether on labels or directly on cases). In the case of printed labels, it is recommended that black print on white background with a matt finish be used (although it is accepted that in some instances labels are colour coded)
- The size of the label and the size of print on labels or size of any pre-printing on outer cases should be appropriate to the size of the outer case and remain clear and prominent to ensure information is clearly visible and able to be read from a distance in a cold store environment under artificial light.
- Labels and label adhesive shall be of freezer grade to withstand cold store conditions over the shelf life of the product without risk of peeling.
- Handling instructions will appear on the labelling when appropriate to ensure the safe and efficient identification and handling of products that need extra attention drawn to them to aid the product's protection. Special handling instructions of this type should not be used indiscriminately.

1. Product Name

Efficient identification of the product is of vital importance to the operations within a cold store and delivery vehicle. Requirements below are identified as Mandatory Legal Requirements or Good Practice Requirements

Mandatory Legal Requirement – The Name of the Food

There needs to be a clear distinction between: the legally required '**name of the food**', (or if there is no legal name a customary name or full description), which must by law indicate the true nature of the product and may require an extended description; and, a more general '**product name**' used for marketing, which may be referred to as a trade name, brand name, or fancy name. Grade and Variety may also be included where appropriate.

The legal name of the food must appear on the outer case, in some instances this will be the only name used; but a product name may be used for catalogues, price lists, menus, orders, order picking, as well as for product identification on outer cases; circumstances will dictate which name should be emphasised on the outer case to aid order picking and it is best practice to indicate on documents providing only a product name the location where the legal name of the food is provided.

All outer cases must be labelled or printed with the legal name of the food as a minimum. The name of the food should include any indications of its physical condition or treatment that it has undergone, if it would be misleading to omit it. There are also some specific rules for naming meat and fish products, in the Food Information Regulation Annex VI.

The mandatory name of the food only needs to be printed on the outer case once to meet the legal requirement and it can be separate to the product name.

If marketing in the UK, the product name and all mandatory information should be in English. It should be clear, accurate, stated in full, and unambiguous. If the product will be marketed in other European Member States the legal information needs to appear in the language of that Member State.

The name of the food on the outer case must be the same as that on the inner unit, in those situations where the inner pack is labelled as a saleable unit.

Good Practice for Efficient Product identification

Some products will only have the 'legal' name, but in many cases there will also be a product (marketing) name that is used to identify the product in the cold store, this is likely to correspond to the product name used for catalogues, price lists, menus, orders, order picking, and it will be designed to facilitate accurate and efficient order picking.

The product name should be shown **ideally** on all four sides of the outer case and as a **minimum** requirement should be shown on two adjacent sides (one long and one short side). This will aid identification and handling throughout the cold chain.

- This can be separate from and provided more prominently than the legal name of the food, which only needs to appear once. Additional information such as product variety and grade may also be included

Product codes

Where a supplier uses a product code to identify a product, this code should be included with the product name (or legal name), and as a minimum requirement, should appear on two adjacent sides of the case. The supplier product code should be printed in a size that is clearly visible and is easily legible from a distance in a cold store environment under artificial light. The product code should be at least as large as the product name.

Clarity

The product name should be printed in **CAPITALS** and the font used should be bold and of a plain, non-serif style, preferably not in italics or in a condensed style of font.

The size of the characters that can be used for printing key information – the product name and the product code – will depend on the overall size of the outer case. The size of the label and the size of print on labels, or the size of any pre-printing on outer cases, should be appropriate to the size of the outer case and should be such that the key information is clear and prominent.

Where a product name covers a range of varieties or a series of gradings, it is recommended that the clarity of the product name is further enhanced by the variety or grading detail being distinguished by lettering that is significantly larger than the rest of the product name. This will aid identification in cold store environments in distinguishing a product from others in the same range. For example:



Shallow cases

The product name on shallow cases should still conform to the above. Labels or printing should be on the leading edge (as well as the adjacent side) and allow for the product name and product code to be of as prominent a size as is possible. The size of the label should be sufficient to accommodate the remaining information to be included in a format that allows all information to be clear and legible in a cold store environment and/or delivery vehicle.

2. Best Before Date

Mandatory Requirements for all Products

A 'Best Before Date' or 'Best Before End' date or 'date of minimum durability' is required on all products*. A 'Use by' date is not usually appropriate for frozen foods.

The minimum durability date indication on the outer case must be preceded by the words: 'Best Before' or 'Best Before End' and followed either by the date indication in uncoded form (i.e. day, month, year as appropriate) or a reference to where it might be found on the case.

- Frozen foods with a shelf life of < 3 months may be limited to an indication of day and month
- Frozen foods with a shelf life of greater than 3 months may be limited to an indication of month/year

If a 'Best Before' or 'Best Before End' date is used which is not specific and limited to one day's production, a 'Lot Code' to ensure that level of traceability is also required. Such a 'Lot Code' would need to be preceded by the letter 'L'.

* The Durability date should appear on a minimum of one side of the case and should be of a size that is easily legible from a distance.

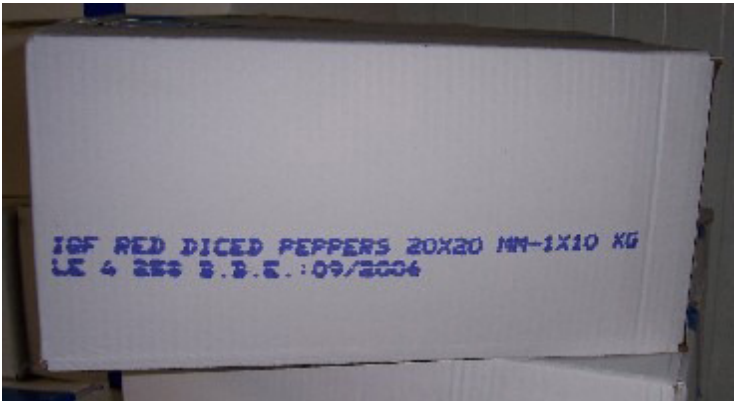
Best Practice Requirements in the Foodservice Supply Chain

The wording 'Best Before Date' or 'Best Before End' date should be in a prominent position. The durability date should appear on more than one side of the case with the product name, and should be of a size that is easily legible from a distance.

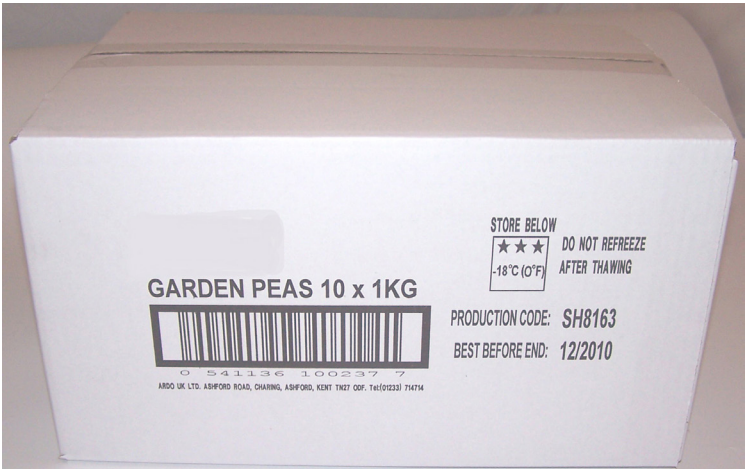
The saturation of inkjet should be complete so as to be clear and legible, ensuring that the ink does not smear or splatter.

Plain film wrapped items within a multipack outer case should be coded with the 'Best Before Date' or 'Best Before End' date to facilitate correct stock rotation for the end-user.

Bad example of Best Before Date



Example of Good Practice of Best Before Date



3. Freezer Storage Instructions

Mandatory Requirements for all Products

Storage instructions are required by law to identify the storage conditions which need to be observed so that product quality and integrity is maintained up to the 'Best Before'/durability date.

For some products of animal origin, the temperature of storage are prescribed in hygiene regulations.

Products labelled 'quick frozen' are also subject to the Quick-Frozen Foodstuffs Regulations which relate to quality and not to food hygiene requirements. Any products labelled as 'quick frozen' in this way must adhere to the detailed requirements of the Regulations.

As there are products labelled 'quick frozen' in the foodservice distribution chain for which the legal temperature requirement is -18°C, it is generally accepted that most operations throughout the whole of the cold chain will be run to accommodate this temperature requirement.

Storage instructions should include as a minimum: 'Keep Frozen', and ideally, 'Store below -18 deg C'.

Instruction would ideally also include: 'Do not refreeze after thawing', or similarly appropriate instructions depending on the product.

4. Name & Address of Manufacturer/Seller/Distributor

Mandatory Requirements for all Products

The name and address of the responsible food business must be provided on the outer case.

The responsible food business is the one under whose name the food is marketed. This is not always the manufacturer; if it is a branded product this will be the brand owner. As a rule of thumb, this is the business name of the organisation who specifies and approves the food information appearing on the product and the outer case.

If the brand owner is based outside the EU, the name and address should be that of the importer into the EU.

5. Premises Identification Number/Health Mark/ Country of Origin

An Identification Number or Health Mark is a Mandatory Legal Requirement for certain Products of Animal Origin

If the content of the case is a product of animal origin such as meat, fish, dairy, eggs or products that are derived from them; that are supplied from premises requiring Local Authority approval, the case should bear either a health mark or a factory identification number.

For products which are a saleable unit, this should be applied in such a way as to ensure that it is destroyed and cannot be reused when the case is opened, such as a label placed across the case seal or the use of pre-printed case tape.

If the case is intended to be divided, each individual unit within the case must bear either a Health Mark or Identification number as appropriate and the outer case marked with the number.

More details on the requirements for identification and health marks can be found in the FSA's Meat Industry Manual – Part Two: <http://tinyurl.com/msmz4ko>

6. List of Ingredients and Quantitative Ingredient Declaration

A List of Ingredients is a Mandatory Legal Requirement where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing this information

The requirement is to provide a list of all of the ingredients in the food, in descending order, by weight. The list must be preceded by a heading that is or includes the word 'ingredients'.

If allergens are present in the food (see section 7), they must be highlighted in bold in the ingredient list.

Some products are exempted from needing an ingredient list. These are not usually applicable to frozen foods but they include:

- Unprocessed fresh fruit and vegetables
- Carbonated water
- Vinegars made from a single ingredient
- Cheese, butter, fermented milk and cream to which only very limited, specified ingredients have been added
- Single ingredient foods where the name of the food is identical to the ingredient or makes the nature of the food very clear

There are also some ingredients such as processing aids, water used as a protective glaze and water used to hydrate another ingredient that do not need to be included in the list.

A Quantitative Ingredient Declaration (QUID) is a Mandatory Legal Requirement where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing this information

A QUID declaration is required in the ingredient list if an ingredient appears in the name of the food and is essential to characterise the food such that it would affect a consumer's decision to buy it.

A QUID declaration is an indication of the quantity that an ingredient represents as a proportion of the whole food as it was prepared. It is given as a percentage either next to the ingredient in the ingredients list or can be incorporated as part of the name.

7. Allergen Information

The Provision of Allergen Information is a Mandatory Legal Requirement where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing the information

The Food Information Regulation makes it a legal requirement to provide information to consumers on certain substances that cause allergies or intolerances. There is also an obligation to caterers to also have this information available to consumers for foods that are non prepacked or prepacked for direct sale or at the request of the consumer.

The caterer is responsible for ensuring that the information that is provided to the consumer is accurate. Food businesses who are suppliers in the catering supply chain also have a legal obligation to ensure that they provide accurate food information to the businesses to whom they supply, to ensure that caterers have the correct information to provide to consumers.

There are 14 allergens that must be declared if they have been used to prepare the food, or are part of an ingredient in the food, they are:

- cereals containing gluten
- crustaceans
- molluscs
- eggs
- fish
- peanuts
- nuts
- soya
- milk
- celery
- mustard
- sesame
- lupin
- sulphur dioxide (at a level above 10mg/kg or 10mg/litre)

When provided to the caterer through outer case labelling, the allergens must be highlighted in the ingredient list, this can be through bold text, a different font or colour or by underlining the allergen.

It is absolutely critical that accurate allergen information is provided to the consumer or caterer who is serving the consumer. We would recommend that even if the allergen information is provided in a specification or commercial document that it should also be printed on the outer case, if this is the saleable unit, and on any individual pre-packed units inside the case, especially if there is the danger that units will be removed from the outer case and the outer case discarded.

The FSA has produced guidance on the indication of allergens which can be accessed through this link: <http://tinyurl.com/I95m6et>

8. Nutrition Information

The provision of Nutrition Information is a Mandatory Legal Requirement from 13 December 2016 where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing the information

Up until 13 December 2016, the provision of nutrition information is voluntary. However if it is given on a voluntary basis through labelling, it must be provided in the format that is prescribed in the Food Information Regulation. After 13 December 2016, it will become a mandatory requirement to provide this information to the consumer or a caterer.

The nutrition information must include: the energy value in K joules and K calories and fat, saturates, carbohydrates, sugars, protein and salt and, unless space prohibits must be provided in a prescribed tabular format.

REFERENCE INTAKES FOR ENERGY AND SELECTED NUTRITENTS OTHER THAN VITAMINS AND MINERALS (ADULTS)

(R1169/2011, Annex XIII Part B)

Energy or nutrient	Reference Intake
Energy	8 400 kj/2 000 kcal
Total fat	70 g
Saturates	20 g
Carbohydrate	260 g
Sugars	90 g
Protein	50 g
Salt	6 g

Certain foods for example, single ingredient, or single category of ingredient foods e.g. water and salt are exempt from the requirement to provide Nutrition information

The Department of Health have provided technical guidance on the provision of nutrition information: <http://tinyurl.com/pehxp07>

- Where the case is a saleable unit intended for supply in that form to a consumer the information must be on the outer case.
- Wholesale businesses supplying non prepacked products (loose foods) to caterers (and consumers) do not have to provide this information, but would need to if it was supplied on a business to business basis – even if it was ultimately intended for a caterer. This is because when the food is sold business to business, the ultimate use of the product may not be known; therefore, it has to be presumed that it may be packed and the nutrition information required.
- If nutrition information has been provided to the caterer through a specification or commercial document, it does not have to be printed on the outer case. If the information has not been provided through a specification or commercial document, it must be provided on the outer case.

9. Instructions for Use

Provision of instructions for use is a Mandatory Legal Requirement where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing the information

Instructions for use must be given if it would be difficult for the consumer or caterer to make use of the product without them. This would include cooking or particular preparation instructions

10. Quantity Declaration

A Net Quantity declaration is a Mandatory Labelling Requirement where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing the information

An indication of the net quantity must be provided for the food and should be provided in metric units of litres, millilitres or centilitres for liquids and grams or kilograms for solids, unless they are sold by number count. The packaging **must** have metric weight and may also have imperial.

Where the case is a multipack, the quantity indication should give the weight of each individual multipack and the number of individual packs

Where a product has a protective ice glaze, the net weight should exclude the weight of glaze.

Where a declaration of net weight is provided, this must be in accordance with Weights and Measures legislation: If the case weighs 1kg or more, the lettering must be at least 6mm high and metric weight declared in kg and decimals (not grams). If weighing less than 1kg, the lettering must be at least 4mm high and metric weight should be in grams.

Net Quantity: Provision of the net quantity directly on the case is a legal requirement only if the case is a saleable unit to the consumer; otherwise the information can be provided through a specification or commercial document.

Good Practice for Efficient Product Identification

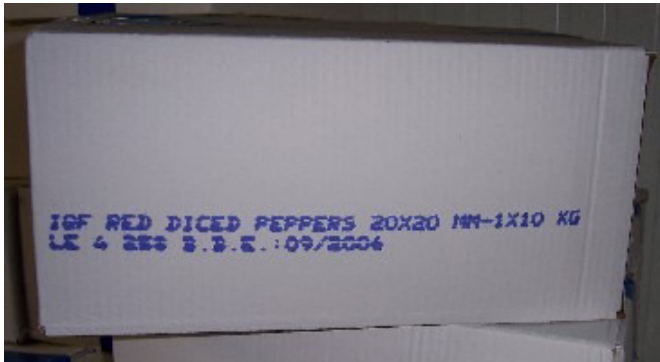
Where there are a number of packaging format variants for a product, a quantity declaration e.g. unit quantity/portion size etc. can be essential for accurate selection of a product.

Information about case contents should be clear, given in full and should be unambiguous.

If quantity information is essential to permit accurate picking of a product, then it should be included with, or given alongside, the product name, and as a minimum requirement, should appear on two adjacent sides of the case.

If the case weighs 1kg or more, the lettering must be at least 6mm high and metric weight declared in kg and decimals (not grams). If weighing less than 1kg, the lettering must be at least 4mm high and metric weight should be in grams.

Bad Example of Quantity Declaration



Example of Good Practice of Quantity Declaration



11. Batch Code/Lot Code/Production Code

The Provision of a 'Lot Code' is a Mandatory Labelling Requirement where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing the information
- If the minimum durability date or Best Before does not provide traceability at least to a specific day

'Lot Codes', 'Batch Codes' or 'Production Codes' are very important for traceability. In order to comply with Directive 89/396/EEC on indications or marks identifying the lot to which a foodstuff belongs, a 'Lot Code' is required. The indication of the lot must be preceded by the letter 'L'.

A 'Lot Code' would not be required if the durability date is presented in the format of 'Best before', indicating as a minimum the Day and Month as this is sufficient alone to indicate the lot to which the food stuff belongs. However, where the durability for a frozen foodstuff is indicated as a 'Best Before End' in the form of Month and Year or Year alone, a 'Lot Code' would be needed, as in this case the 'Best Before End' does not give sufficiently precise information.

Additionally a date of freezing or 'frozen on' date is required for frozen meat, meat preparations and unprocessed fishery products. This must be given in the uncoded format of Day/Month/Year, which meets the 'Lot Code' requirement and provides a sufficient level of traceability precision. There is therefore an opportunity to incorporate it into the 'Lot Code' for these products and avoid three lines of coding i.e. 'Durability', 'Lot Code' and 'frozen on' date.

Good Practice for Batch Code/Lot Code/Product Code Indications

Good practice will dictate that a Batch Code/Lot Code/Production Code is used on the outer case to assist with traceability, even where it is not a legal requirement as such codes can give a great deal of important traceability information and provide a greater level of granularity than given by a date code alone.

Plain film wrapped items within the outer case should also be coded with the Batch Code/Lot Code/Production Code to aid product traceability right through to the end-user.

Where such codes are in date format, the 12 month Julian calendar format can be used. Where this is used, the 29th of February should be coded as 366 on the production lot code calendar.

The 'Batch Code' on the outer case must be consistent with any 'Batch Code' used on the primary pack/inner unit. Or if repacked, a mechanism in place to ensure that traceability throughout the supply chain is maintained.

Where manufacturers include production time within their 'Batch Codes', then these should also be included on the label or printing on the outer case if possible.

The Batch Code/Lot Code/Production Code should be shown on a leading edge on the outer case.

To aid traceability, the Batch Code/Lot Code/Production Code should be readily identifiable by jet-printing and should be clearly legible. It is recommended that the label or pre-printed outer case should state 'Batch Code' or 'Lot Code' or 'Production Code' to allow the exact code or number to be shown at that position.

The Batch Code/Lot Code/Production Code should not be handwritten onto the outer case. Generic calendars that require ticking/marking should not be used.

Date of First Freezing

Printing the 'frozen on' date for frozen meat, meat preparations and unprocessed fishery products can present quite a challenge. The information is likely to be applied to the label online at the same time as the date of minimum durability ('Best Before End' – BBE) and 'Lot Code' information and many printers can only manage two lines of information. In order to accommodate the additional 'frozen on' information within current printing space constraints, food businesses may use the 'date of freezing' as an indication of 'Lot' provided that:

1. The indication of 'date of freezing' complies with the Food Information Regulation (ie Annex X(3)(c)) <http://tinyurl.com/ha3sdpt>
2. The information is preceded by the letter 'L'
3. The 'date of freezing' is indicated as set out in a manner consistent with the example below, note that
 - a. the indication of minimum durability is provided
 - b. the 'date of freezing' is shown also to be the Lot Code', replacing the julienne code typically used by food businesses
 - c. any additional lot or batch traceability information can be provided after the date of freezing, allowing a space in between.
 - d. The words 'Frozen on' and the letter 'L' are provided

Food Business Operators are able to tailor additional voluntary coding information, enabling greater granularity for traceability purposes, to the remaining space available within coding window for any given package. E.g the factory site, line, shift, and time identifiers as desired or to meet particular business traceability needs.

Frozen meat, meat preparations and unprocessed fishery products must therefore be labelled with three pieces of information:

- Durability date in the format "Best Before"
- Any additional lot or batch traceability information, including voluntary information, to give greater precision for traceability purposes
- "Frozen on" date

Examples of how this might appear on the outer case label are shown opposite:

Best Before End

Nov 14

Production Code L 07/05/13 XY 12 10:30

Frozen on ↑

Best Before

07/11/17 5311 XY 10:30

07/11/15

Frozen on ↑

Best Before

07/11/17

5311 XY 10:30

Frozen on

07/11/15

Note that:

- 07/11/17 is the durability date
- 07/11/15 is the “Frozen on” date and must be accompanied by the words “Frozen on”
- 5311 XY 10:30 represents any additional lot or batch traceability information, that can be provided after the Best Before date, as in the example above; as long as a space is left in between .

12. Country of Origin

A 'Country of Origin' is a Mandatory Legal Requirement for Certain Products

For these products a 'Country of Origin' indication would be mandatory on the outer case where:

- It is the saleable unit to the consumer
- It is the saleable unit to a caterer in the absence of a specification or commercial document containing this information

In other cases it would be good practice.

The Food Information Regulation and other Regulations specify that the foods below must bear an indication of their Country of Origin or Place of Provenance:

- Beef
- Honey
- Fruit and Vegetables
- Olive Oil
- Fresh and Frozen Poultry Meat
- Fresh and Frozen Pork
- Fresh and Frozen Sheep Meat
- Fresh and Frozen Goat Meat

It is also mandatory where a failure to provide the information would be considered misleading to the consumer. Such as a case design that included a British Flag, when the meat originated in Denmark.

13. Bar Coding

Good Practice Guidance for Unique Product identification and enhanced traceability.

Bar coding is not a legal requirement but can assist in the transit of Regulatory information through the supply chain. Using a barcode to hold this information will help to ensure that such information is accurate and correct so that you can be confident that you are legally compliant.

A bar coding system is strongly recommended to facilitate efficiencies in the cold chain.

Bar coding provides a unique identification system by means of a machine readable symbol which can enhance systems of traceability, stock rotation, transport and administration to enable companies to operate more effectively.

Where bar coding systems are used, it is important that high quality procedures for article numbering and bar coding are in place. To be effective throughout the cold chain, bar code symbols should scan correctly at every point of scanning. Print quality, position, accurate data, colours and size are all important aspects.

It is important that neither tape nor banding obscure the effective scanning of the bar code.

Bar codes should be unobstructed and in full view in pallet configuration.

Where bar coding systems are used, it is important to meet the bar coding protocol required by your customer.

For specifications and GS1 standards contact:

GS1 UK
Staple Court
11 Staple Inn Buildings
LONDON WC1V 7QH
Tel. 0207 092 3500
www.gs1uk.org

GS1 have developed a programme to:

- establish best practice for the application of barcodes to units, cases and pallets and their usage throughout the foodservice supply chain.
- provide a standard electronic method for synchronising structured product data through an Internet-based electronic catalogue.

14. Position of Labels or Pre-Printing Position

Good Practice Guidance for Efficient Product Identification

The position of labels and position of pre-printing on outer cases is of prime importance to the efficient identification and handling of outer cases.

Wherever practical, the key information should be printed on all four sides of a pre-printed case. However, for labelled cases this is often not practical or cost effective. For labelled cases, **key information** should be on two adjacent sides, i.e. one short and one long side.

Key information in this regard is the product name (including variety or grade detail where relevant) and the supplier product code. To coordinate with advice from GS1 regarding printed bar codes, the key information should, if possible, be included on a short side of the case and the adjacent long right hand side.

Bar code information where used should follow the requirements of GS1 UK.

Where manufacturers' systems print off one label which is attached horizontally around the corner of the outer case, then the key information shown on the label should be duplicated to ensure the same information shows on both the adjacent sides of the case.

Other regulatory information need appear only once on the case, preferably on a side panel.

Labels and pre-printing, including bar codes, should remain clearly identifiable when palletised.

Labels and label adhesive shall be of freezer grade to withstand cold store conditions over the shelf life of the product, without risk of peeling.

Labels and pre-printing, including bar codes, should not be obscured by tape or banding.

15. Clarity and Size of Label or Pre-Printing on Outer Case

Good Practice Advice for Identification in a Cold Store

Adhesive Label Option

One option is the use of a wrap-around adhesive label.

Key information should be shown on two adjacent sides. This is the product name, product code and where relevant, variety or grade detail and/or case content information.

Clarity & Size of Label or Pre-Printing on Outer Case

Clarity

Clarity and legibility of label or pre-printing are of prime importance in cold store conditions to ensure the efficient identification and handling of outer cases.

The size of the label and the size of print on labels or size of any pre-printing on outer cases, should be appropriate to the size of the outer case and remain clear and prominent to ensure information is clearly visible and able to be read from a distance in a cold store environment under artificial light.

It is essential that there is good contrast under conditions of artificial light between the colour of the background and the colour used for printing (whether on labels or directly on cases). In the case of printed labels, it is recommended that black print on white background with a matt finish be used.

Print quality

Generally, it is recommended that coloured print should not be used. However if coloured print is used then the colour should be distinct in contrast to the cardboard of the outer case, or to the background colour of the label, to ensure legibility at a distance in cold store conditions. Colours such as yellow, orange, pale green, or pale blue should not be used.

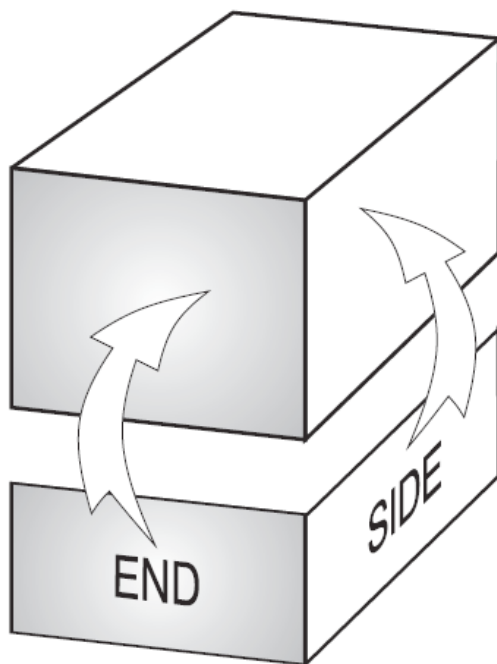
If there is a specific customer requirement for colour-coded labels, special attention should be paid to ensure that the contrast between print and label is not compromised.

Guidelines and recommendations from the e-centre for bar codes should be adhered to.

All lettering and printing should be complete, clear, accurate and saturated with no smearing or smudging. Print quality should be checked regularly throughout the print run.

Shallow Cases

The labelling or printing on shallow cases should conform to the above. Size of label or printing should be adjusted to allow lettering to be shown in a prominent size. The size or position of the label should also be sufficient to accommodate the remaining information to be included in a format that allows all information to be clear and legible in a cold store environment. Where space limitations are severe, it is possible for an information panel to be included on the top surface of the case.



16. Handling Instructions

Good Practice Guidance For Safe and Efficient Handling

Handling instructions will appear on the labelling when appropriate to ensure the safe and efficient identification and handling of products that need extra attention drawn to them to aid the product's protection.

Handling labels will alert all food handlers in the chain. Such handling labels should be clear, prominent and clearly visible and should be able to be universally recognised throughout the cold chain in order to deliver the product in prime condition to the end customer. No adhesive tape or other label should obscure the handling label. It is recommended that handling labels should be a separate label or should be shown prominently where cases are pre-printed.

Special handling instructions of this type should not be used indiscriminately.

Handling labels will include the following examples, where appropriate to the product:

FRAGILE
(e.g. meringues)

THIS WAY UP!
(with appropriate arrow marking)

DO NOT STACK ON SIDE

GATEAU BOX - PLEASE TAKE CARE

STACK ON TOP OF PALLET ONLY

TEMPERATURE SENSITIVE!
Please put away urgently
or
TEMPERATURE VULNERABLE!
(for products such as ice creams)

MAXIMUM STACKING LEVEL = XXX NO. OF LAYERS
or
STACK NO HIGHER THAN XXX NO. OF LAYERS

17. Strength & Appropriateness of Packaging Materials

Good Practice Guidance For Protecting Product Integrity

Strength

The strength of the cardboard used should be of a quality appropriate and adequate to the product contained therein to ensure that the product or inner packs inside the outer case are preserved in a prime quality condition from manufacturer to end user.

Strength of the packaging used for the outer cases should also take into account the weight that the outer cases stacked at the bottom of the pallet will need to sustain when the pallet is full and thus ensure the lower outer cases are not damaged.

Each situation will be an assessment of the specific product and the storage conditions. However, as packaging in cold store conditions will have a high moisture content which may result in a reduction in compression strength, then it is recommended that any individual assessment also includes a factor that guarantees the robustness of the outer cases at the bottom layer of the pallet.

Appropriateness

Outer cases must match the inner product, e.g. where the inner product is a gâteau, the outer case should be appropriately sized to prevent possible damage to the product which could be caused by movement within the outer case.

Weight and size of outer cases should be practical for manual handling and satisfy the Manual Handling Operations Regulations.

A foodservice product has the potential of being handled numerous times and packaging quality should be of a robust nature able to withstand multiple handling throughout the distribution chain in order to protect the quality of the product.

Packaging Essential Requirements

All packaging must comply with the Packaging (Essential Requirements) Regulations 2003 (as amended). In particular the volume and weight must be the minimum amount to maintain the necessary levels of safety, hygiene and acceptance for the packed product and for the consumer.

Where a decision is taken to increase packaging to protect the product, the evidence to support this decision must be recorded in the required technical file.

Comprehensive guidance on the essential requirements is available at: <http://tinyurl.com/qxw6l4o>

18. Pallet Configuration

Good Practice Guidance to Ensure Pallet Stability and Safety

Pallet Configuration

Labels, pre-printing and bar codes should be clearly visible on the outside layers. All cases should be stacked the correct way up.

Any warning label that indicates maximum number of stacking layers should be clearly visible to facilitate good practice within cold stores.

Pallet configuration should be stable and safe to lift.

All pallets must be stable, and have products secured upon the pallet in such a manner to avoid the crushing of the product prior to delivery.

Configuration of outer cases should fit pallet and should not overhang. It is recommended the outer case configuration should fit a footprint of a 1200mm x 1000mm x 161mm pallet.

Specific requirements

All pallets used should conform to BS ISO 6780. The specific requirements of this are that they must be nailed soft/hard wood, four way entry, non-reversible close boarded deck (nominal gap 25mm), mitred perimeter base.

Dimensions should not exceed 1200mm x 1000mm x 161mm and corner blocks of a minimum 138mm x 96mm x 96mm pallet.

Weight Tolerances - Weight tolerances should be checked with individual customers. However, it is recommended that tolerances for loaded pallets should not exceed one metric ton on beam.

Height Restrictions - Be aware that restrictions regarding pallet height should be checked with your customer.

19. Other Legal Labelling Requirements

The labelling of foodservice products must comply with all relevant national and European legislation. The key requirements are in the Food Information Regulations 2011, although there are many other regulations that also directly affect product labelling. Where the outer case is the saleable unit or is being supplied to a caterer where a specification or commercial document has not been supplied beforehand or with the delivery, the legislative requirement will apply directly to the outer case.

For an individual product, the manufacturer will decide whether inner packs are to be treated as 'saleable units' and therefore whether they will be fully labelled in accordance with all legal requirements. If inner packs are not packed and labelled as 'saleable units', the outer case becomes the 'saleable unit', and will need to be labelled accordingly.

The EU's general requirements for food labelling are contained in Regulation (EU) No 1169/2011 (as amended). These requirements are enforced in the UK under the provisions of the Food Information Regulations.

Various product attributes can be important in the marketing of individual products - GM, Organic, Vegetarian, Vegan, Halal, Kosher, Protected Geographical Indications 'Country of Origin', MSC and Fair Trade et al. Some of these are subject to legal requirements, others to other 'controls', or to official guidance - all of which must/should be complied with as appropriate. It is not the purpose of these Guidance notes to provide detailed information in these areas, but as it may facilitate trade, consideration should be given to whether it is useful to provide such information on the outer case.

There are other defined legal requirements for outer case labelling for specific product areas eg poultrymeat and minced meat products. Members are advised to check with your legal authorities prior to printing.

Annex 1

The following scenarios are taken from BFFF Primary Authority Assured Guidance Version 1

Labelling required for food supplied by wholesaler to mass caterer

Scenario 1.

Food is supplied by wholesaler non prepacked; food will be supplied to the consumer by caterer non prepacked or prepacked on the premises ready for consumption

Food is supplied loose (non prepacked) by the wholesaler to the caterer and is intended for supply to the consumer either in the same format (i.e. loose) or prepared and/or prepackaged for supply to the consumer as prepacked for direct sale. Article 8 (6) of FIC applies.

The information which must be supplied by the wholesaler to the caterer is limited. In this scenario, **only information on allergens** must be provided on a mandatory basis in accordance with FIC. National derogations (FIC) also require the **name of the food** and, for products containing meat, the **QUID for meat**.

Allergen information is “mandatory food information” that the caterer must have available to advise the consumer. The information on allergens that must be provided by the wholesaler to satisfy the regulatory requirement of FIC relates to allergens that are ingredients or components of ingredients in the food. Providing information on allergens that may be present in the food due to unintended cross contamination is not a requirement of the regulations, however it can be provided on a voluntary basis.

There is no prescribed format in which wholesale businesses must provide the allergen, name or QUID information for non prepacked foods. BFFF would recommend that the regulatory requirement can most efficiently and accurately be met through product labelling; however other methods such as spreadsheets, online databases, specifications or commercial documents can be used. If such mechanisms are used, the wholesaler must have mechanisms in place to ensure that the information is accurate and situations when products are updated or substituted are managed, to ensure that the caterer has the correct information at all times.

According to Article 44.1(b), EU Member States can regulate locally to require other information to be provided on a mandatory basis. In the UK, the Food Information Regulations or Statutory Instruments require under regulations: 6(3) and 7(3): ‘That for loose foods the ‘Name of the food’ and QUID for products containing meat are also provided’.

Scenario 2.

Food is supplied prepacked by the wholesaler to the caterer and is intended for preparation, processing, splitting or cutting up before supplying to the consumer as loose food or packed directly for sale.

As the food supplied to the caterer is prepacked food, all mandatory particulars relevant to the food must be provided and Article 8(7)(b) applies.

The wholesaler must ensure all mandatory particulars required under Articles 9 and 10 appear on the outer case or on a label attached thereto, as the packaging in its current format will not be used for the final consumer.

Alternatively the information can also be provided on **commercial documents** referring to the foods where it can be guaranteed that such documents either accompany the food to which they refer, or were sent before, or at the same time as delivery. The information should be provided in the language of the country in which the product is to be marketed to the consumer.

Commercial documents can include product specifications, data sheets or delivery notes. If these are relied upon to satisfy the mandatory requirement under FIC, then systems must be in place to ensure that the information is up to date at all times.

Experience has shown that in most cases where branded (not the wholesaler's own label) product is involved; the maintenance of accurate and current information that has been separated from the product (i.e. through commercial documents), is extremely difficult and impractical.

Recognising the difficulty in implementing systems that can guarantee the mandatory information is completely up to date at all times, particularly during product redesigns when more than one variant may be in the supply chain or in situations when product is substituted to fulfil orders, we would suggest the use of a statement on order confirmation to the nature of:

'The information provided is correct at the time of issue, to ensure that you have the most up to date information, please check the product label on delivery'.

Provision of full mandatory information through labelling of the outer packaging is a practical mechanism to satisfy the Regulatory requirement.

If prepacked food is supplied to a mass caterer in this scenario and full mandatory information is not provided on the outer packaging i.e. it is provided through commercial documentation, the outer case as a minimum must be labelled with the following mandatory information:

- The 'name of the food' – As a pragmatic approach Defra has agreed that this does not have to be its' full legal name but a descriptor suitable for identifying the product in the supply chain. A full legal name would have to be provided as part of the commercial documents
- The date of minimum durability - 'Best Before' or 'Best Before End' date
- Any special storage conditions and or conditions for use – 'keep frozen'
- The name and the address of the food business which is responsible for the information – if the product is own label this is the wholesaler, otherwise it is normally the brand owner.

BFFF consider that it is good practice to meet the regulatory requirement by providing full mandatory information through labelling of the prepackaging or outer case.

If it is possible that a multipack case will be divided and the individually prepacked units inside will be supplied separately to caterers, each of the individual packages should be labelled with full mandatory particulars.

Scenario 3.

Food is prepacked, supplied by the wholesaler to the caterer in a multipack format for the caterer to supply to the consumer as individual packs in unchanged form.

In this scenario, the caterer is receiving food from the wholesaler in the same format in which it will be supplied to the consumer; examples include chocolate confectionery, canned drinks or packs of biscuits. Since the caterer does nothing to this, such products are treated as “prepacked food” as defined in Article 2(2)(e) and Article 12(2) applies: **In the case of prepacked food, mandatory food information shall appear directly on the package or on a label attached thereto.** Therefore each of the individual packages must be labelled with the applicable mandatory particulars.

For the purposes of outer case labelling, Article 8.7(b) applies; as the case of individual packs will be ‘split’ before being supplied to the consumer. As in scenario 2, full mandatory particulars can be provided on the outer case label or through commercial documentation. As a minimum however, four minimum pieces of information must be indicated on the external packaging/outer case: a) the ‘name of the food’; b) the ‘Use By’ or ‘Best Before’ date; c) the storage conditions and/or conditions of use, such as ‘keep frozen’ and d) the name and address of the responsible food business operator.

BFFF recommend that good practice to facilitate the accessibility of information through the foodservice supply chain would be to repeat full mandatory information on the outer case. This means that the mandatory information can be verified as part of any due diligence sampling through the supply chain without damaging the integrity of the case and also, that any associated commercial document or specification does not have to be relied upon for the most up to date mandatory information.

Responsibility for providing the mandatory information on the individual sales units is dependent on whether the food is branded or own label.

For own label products, the wholesaler is responsible for the provision of all mandatory information which is appropriate to the food as required in Articles 9 and 10.

For branded products Article 8(3) applies and the wholesaler “shall not supply food which they know or presume, on the basis of the information in their possession as professionals, to be non-compliant”.



British Frozen Food Federation
Warwick House, Unit 7, Long Bennington Business Park,
Main Road, Long Bennington,
Newark, NG23 5JR
Tel. 01400 283090
www.bfff.co.uk