

Honey & Jam Labelling

David Gregory

Bridgend CBC Trading Standards

Legislation

- Food Safety Act 1990
- Regulation (EU) 1169/2011
- Food Information (Wales) Regulations 2014
- Honey (Wales) Regulations 2003
- Jam & Similar Products (Wales) Regulations 2003
- Weights & Measures Act 1985

- The Food Safety Act 1990 creates a criminal offence of falsely describing or presenting food.
- The general labelling rules for foods is now covered by Regulation EU 1169/2011 known as the Food Information for Consumers Regulation or EU FIC.

- The labelling of general foodstuffs
- The labelling of honey
- The labelling of jam and similar products

- These are all regulated by specific legislation that has its origins in Europe and the desire to harmonise labelling across the EU to assist in cross border trade.

What To Put On A Label?

Where To Start?

- The required information required for a food label is determined by the answer to the following question...
- Will the food be sold prepacked?

Prepacked or Non-prepacked?

- Prepacked – a food sold to the consumer in a packed form by a person not responsible for packing it.
- Non-prepacked foods – all other foods. Includes foods sold loose, foods for immediate consumption and foods “prepacked for direct sale”.

What Difference Does It Make?

- Prepacked foods require full labelling.
- Labelling for foods that are not-prepacked are governed by UK national rules but must have allergen information available.

Labelling of Honey & Jam

- All honey, jam and other foods packed by members of the BBA and sold at their own market stall would be considered non-prepacked
- All honey and jam manufactured by members of the BBA and sold through a third party (i.e. local grocer, butcher etc.) is considered prepacked and will require full labelling.

Honey Labelling – Prepacked for Direct Sale

- The Food Information (Wales) Regulations 2014 set out UK National rules on food labelling.
- These Regulations require that food that is prepacked for direct sale is required to be labelled with no information except for the name of the food and to have allergen information available.
- The Honey Regulations require some additional information and regulate some optional declarations.

Allergen Information

- If any food contains one of the specified allergens then this information must be available to prospective customers.
- UK National rules enable this to be provided “in any way” including orally.
- If provided orally then a ‘signpost’ must be displayed. “For allergen information please speak to staff” for example.

Specified Allergens

- Celery
- Cereals containing gluten
- Crustaceans
- Eggs
- Fish
- Lupin
- Milk
- Molluscs
- Mustard
- Nuts
- Peanuts
- Sesame seeds
- Soya
- Sulphur dioxide and sulphites >10mg/kg or 10 mg/litre

FSA loose food guidance



Allergen information for loose foods















Advice on the new Food Information Regulations for small and medium food businesses



June 2014

Allergen check sheet - example

DISHES AND THEIR ALLERGEN CONTENT - [INSERT THE NAME OF YOUR FOOD BUSINESS HERE]

DISHES	 Celery	 Cereals containing gluten	 Crustaceans	 Eggs	 Fish	 Lupin	 Milk	 Molluscs	 Mustard	 Nuts	 Peanuts	 Sesame seeds	 Soya	 Sulphur dioxide
Tuna Salad [example]	✓			✓	✓		✓		✓					

Review date:

Reviewed by:



You can find this template, including more information at www.food.gov.uk/allergy

So What Is Honey?

- The Honey (Wales) Regulations 2003 define honey as...
- The natural sweet substance produced by *Apis mellifera* bees from the nectar of plants or from the secretions of living parts of plants which the bees collect, transform by combining with specific substances of their own, deposit, dehydrate, store and leave in honeycombs to ripen and mature.

What Can Be Sold?

- The Honey Regulations set out what are called reserved descriptions of honey.
- Only honey that meets one of the reserved descriptions can be legally sold using the name honey.

Reserved Descriptions

- Blossom Honey or Nectar Honey
- Honeydew Honey
- Comb Honey
- Chunk honey or Cut Comb Honey
- Extracted Honey
- Filtered Honey
- Baker's Honey

- Each reserved description has a definition set out in the regulations.
- For example – “Blossom Honey”
- “Honey obtained from the nectar of plants”.
- Schedule 1 of the Regulations lists all the definitions of the reserved descriptions.
- See annex 1 to the Food Standards Agency guidance note.

- The reserved name must be used as the name of the food.
- However, the regulations go on to say that the name 'Honey' is permitted for
- Blossom Honey
- Nectar Honey
- Honeydew Honey
- Drained Honey
- Extracted Honey
- Pressed Honey

Place Of Origin

- All honey must be marked with the country of origin
- The regs allows blends to be sold marked as “a blend of EC honeys”, “A blend of non-EC honeys” or “a blend of EC and non-EC honeys”.

Honey – Optional Labelling

- You can choose to label honey with the following optional information;
- Floral or vegetable origin – if the honey comes **wholly or mainly** from that source. NB pollen cannot be removed.
- Regional, Territorial or Topographical Origin – if the honey comes **entirely** from the indicated source.

Honey – Optional Labelling

- Specific Quality Criteria – not defined in the Regulations but taken to mean “fresh”, “natural”, “pure” etc.
- The FSA have published guidance on such terms so packers should take note of them

Honey Labelling (Prepacked for Direct Sale) Summary

- If the food is sold prepacked for direct sale then the labelling must comprise of
- The name of the food “Honey”, “Filtered Honey” etc
- The country of origin
- Plus, optionally may include floral, regional or quality information.
- No other information is required.

Jam Labelling – Prepacked for Direct Sale

- Again, if the jam is sold prepacked for direct sale then it will require minimal labelling.
- Once again, the Food Information (Wales) Regulations require the product to be labelled with a name of food and for the specified allergen information to be available.

Jam Labelling

- Like the Honey Regulations, the Jam & Similar Product Regulations set out reserved descriptions.
- A food can only be sold as jam or similar designations if it meets the definitions in the Regulations.

“Jam”

- A mixture brought to a suitable gelled consistency, of sugar, the pulp or puree or both of one or more kinds of fruit and water, such that the quantity of fruit pulp or fruit puree or both used for every 1000 grams of the finished product is not less than
- 250g in the case of redcurrants, blackcurrants, rosehips, rowanberries, sea blackthorns or quinces
- 150g in the case of ginger
- 60g in the case of passion fruit, and
- 350g in the case of any other fruit.

Other Reserved Descriptions

- Extra Jam
- Jelly
- Extra Jelly
- Jelly Marmalade
- Marmalade
- Sweetened Chestnut Puree
- X Curd
- Lemon Cheese
- Y Flavour Curd
- Mincemeat

Jam Labelling

- A product meeting the description of jam and sold as such is required to be labelled with
- The name of the food
- Allergen information to be available

- Labelling for a food described as 'honey' or 'jam' is relatively straight forward if not sold prepacked.

What About Prepacked Sales?

- Regulation EU 1169/2011 (the EU FIC) sets out the mandatory information required on labels.
- The Honey Regulations do not apply any additional labelling requirements
- But... the Jam & Similar products Regulations do apply additional labelling requirements.

EU FIC— Mandatory Food Information

- The EU FIC sets out what is referred to as the mandatory particulars.
- These requirements apply to all pre-packed foods.

List of Mandatory Particulars

- Name of food
- List of ingredients
- Allergen information (if needed)
- Percentage of some ingredients
- The net quantity
- Minimum durability date
- Storage Instructions / Conditions of use
- Name of food business operator responsible
- Country or place of origin (if misleading without)
- Instructions for use where needed
- ABV for alcoholic drinks
- Nutrition declaration (from 13 Dec 2016 subject to exemptions)

Full Labelling

- Some of the information has already been required for foods prepacked for direct sale such as
- Name of food (Honey & Jam)
- Place of origin (Honey)

Full Labelling

- Some information is exempted
- For example, as honey is a single ingredient food so it is exempt from the requirement to give an ingredients list.

Full Labelling In More Detail

- Name of food
- In the case of honey or jam it is a name prescribed by law.
- For a food such as chutney it must be a true (descriptive) name or a customary name.

Full Labelling In More Detail

- Ingredients list
- This must be in descending weight order.
- If an additive is used in prepacked foods then it must specify the name of additive (or E number) and it's function.
- Example "Colour: Beetroot Red" or "Colour: E162".

Full Labelling In More Detail

- Percentage of some ingredients
- If an ingredient is given emphasis or is characteristic of a food then the percentage must be given.
- Example – Beetroot Chutney. The percentage of beetroot in the food must be given on the labelling. This can be in the ingredients list, in the name of the food or a specific declaration.

Full Labelling In More Detail

- Name and address
- The name and address of the food business operator responsible for the food must be given.
- Address must be capable of receiving post
- Consider own brand labelling. You are responsible if your name is on the label!

Full Labelling In More Detail

- Minimum Durability
- The food must be marked with an indication of minimum durability.
- In the case of jam, honey and chutney it should be in the form “Best Before”.

Best Before Indications

- For a food expected to last less than 3 months – Best Before DAY:MONTH.
- For a food expected to last 3 to 18 months – Best Before End MONTH:YEAR.
- For a food expected to last more than 18 months – Best Before End YEAR.
- However, a specific date is permitted for all products.

Full labelling in more detail

- Allergens
- Where a food contains any of the 14 specified allergens then its presence must be **emphasised** in the ingredients list and repeated if necessary.
- Allergen boxes are NOT permitted.

Full Labelling In More Detail.

- Instructions for use & storage instructions
- If a food needs instructions for use then these must be on a label e.g. “Add water” or cooking instructions.
- If a food needs storage instructions then these must be given e.g. “keep refrigerated” or “store out of direct sunlight”.

Full Labelling In More Detail

- Place of origin.
- The general principal of the EU FIC is that a country or place of origin is not required unless failure to do so would be misleading (There is an exception for certain meat products which may be extended in the future)
- Need to consider company name, logo, nature of the food etc.
- Example – “Welsh Produce Ltd” want to import a product from France and sell under their own name. The company name and address may give the food a ‘Welshness’ that it is not entitled to so food should be marked “Made in France” or similar.

Honey

- Whereas the EU FIC requires a place of origin if failure to provide it would be misleading, The Honey Regulations require the product to be labelled with a country of origin in all cases.
- Otherwise there are no further requirements than those already laid down.

Honey: BHIPA Code

- Since 1996 the British Honey Importers & Packers Association have adhered to a voluntary labelling code whereby all honey on retail sale includes a warning that **“honey should not be given to infants under 12 months of age”**.
- This is entirely voluntary although the Food Standards Agency recommends its use.

Prepacked Jam

- Jam or similar products sold prepacked must be labelled with the information required by the EU FIC plus
- The total amount of fruit in the food
- The total amount of sugar in the food

Required Declarations

- Total amount of fruit declared in the form “Prepared with X g of fruit per 100g”
- Information available from recipe.
- Total amount of sugar declared in the form “Total sugar content: Y g per 100g”
- Sugar content calculated by refractometer at 20 degrees Celsius.

Presentation

- The EU FIC introduces a minimum font size for the mandatory particulars on a prepacked food label.
- This is set at a minimum x-height of 1.2 mm.
- Smaller packages (largest surface area <math><80\text{ cm}^2</math>) can use minimum 0.8mm.

Nutrition Information

- Not required until 13 December 2016 for all prepacked foods.
- But...there are 19 exemptions!
- Exemption for food, including handcrafted food, directly supplied by the manufacturer of small quantities of products to the final consumer or to local retail establishments directly supplying the final consumer.

Weights & Measures Act 1985

- The Weights & Measures Act requires a weight marking to be applied to both honey and jam whether prepacked or prepacked for direct sale.
- There used to be 'prescribed' quantities that must be used.
- 57g, 113g, 227g, 340g, 454g, 680g or multiple of 454g.
- If made up in advance (which will be the case generally) then these quantities no longer apply.
- NB Imperial quantities can be marked but cannot be more prominent than the metric indication.

The End

- David Gregory
- Lead Officer for Food Standards
- Bridgend Trading Standards Service
- Telephone 01656 643276
- Email: david.gregory@bridgend.gov.uk