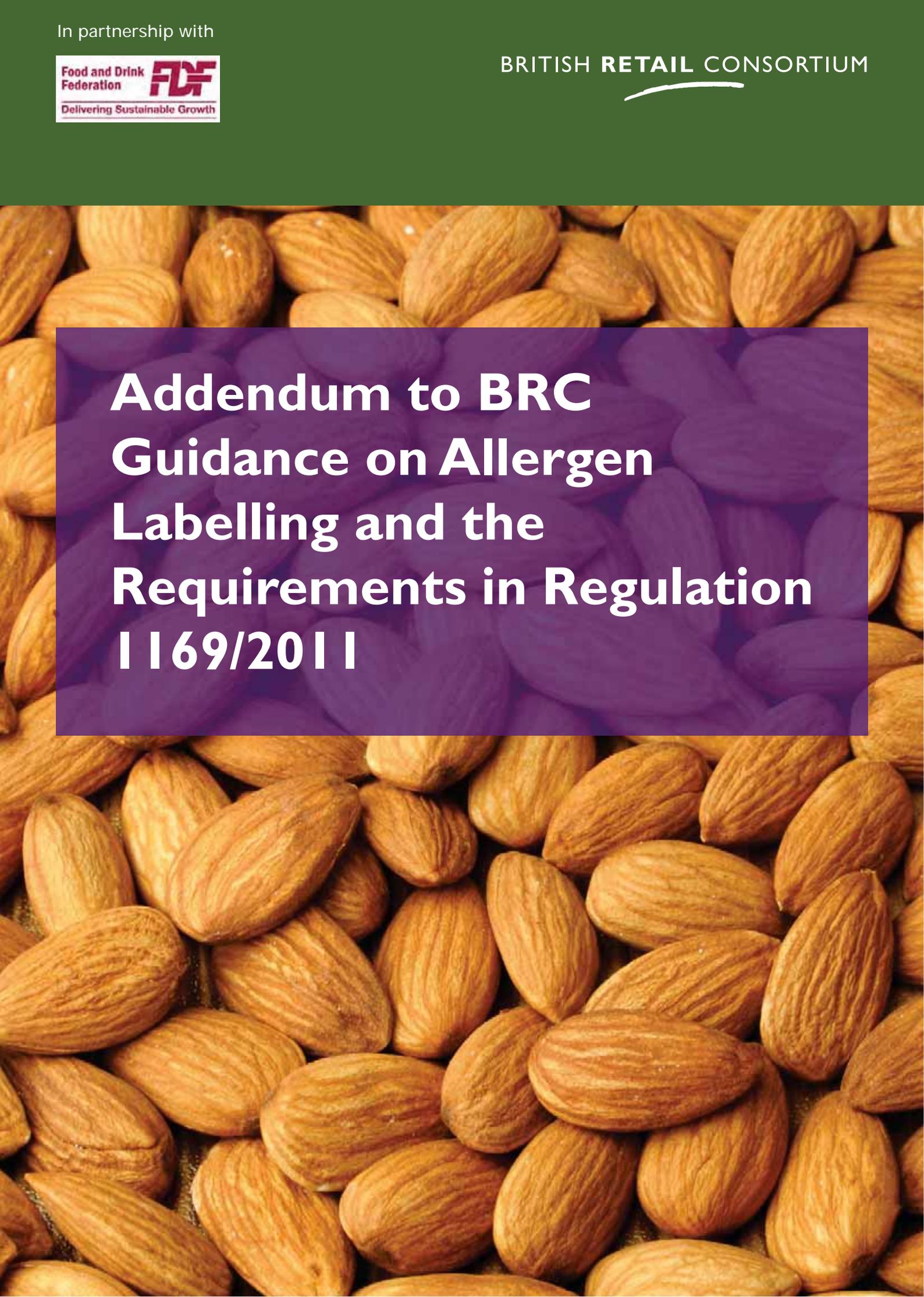


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BRITISH RETAIL CONSORTIUM

The background of the entire page is a close-up, high-resolution photograph of almonds. The almonds are light brown with a distinct ribbed texture and are scattered across the frame, creating a dense, natural-looking pattern.

Addendum to BRC Guidance on Allergen Labelling and the Requirements in Regulation 1169/2011

INGREDIENT LIST

Background

The following text supplements the information covered in the BRC Guidance on Allergen Labelling and the Requirements in Regulation 1169/2011 document.

1. Highlighting method

It is prudent to check that the chosen labelling layout actually delivers a clear message to the consumer. Whilst most packaging elements can be checked by inspection of proofs, the actual packaging manufacturing process as well as final production can introduce variance from design that had not been anticipated. For example, certain packs will be prone to variations due to the nature of the printing process. Aspects of the printing process, such as dot gain, ink density & impression rollers, can have an effect on the boldness of text throughout the print run and from run to run, which may make it difficult to discern if text is standard or bold.

One approach which may avoid this is to combine forms of highlighting; e.g. combinations of bold, underlining, italics, capitals, etc. In such cases the allergy advice statement can be provided as, for instance, “For allergens, see ingredients in **BOLD** / **bold** / *italics*”. Similarly, flow or stretch wrapping may distort or obscure text, whilst with clear containers certain product colours may lessen contrast, making text difficult to read. These examples all support the need for close liaison and dialogue with all stakeholders from origination, through packaging production to the food manufacturing user.

2. Nuts

When the product contains one or more nuts as deliberate ingredients, these will be included and highlighted in the ingredients list. If required, the cross contamination statement could be one of the following:

Also may contain other nuts

May also contain other nuts

Also may contain almonds, hazelnuts, (name the nuts as listed in Annex II of the Regulation)

4. Crustaceans and molluscs

The term shellfish can no longer be used to describe crustaceans and mollusc.

5. Milk

Milk sold as such, for example a bottle or carton of milk, does not need the statement ‘contains milk’ on the label. The product name clearly indicates that the product is milk.

6. Cereals containing gluten

LABELLING OF SPELT / KAMUT

The list of cereals containing gluten was amended in February 2014 to incorporate spelt and khorasan wheat.

Spelt

The Regulation requires the allergenic substance to be highlighted in the ingredients list; that is 'spelt'. Within the declaration 'spelt (wheat)', spelt will need to be highlighted; however companies may choose to additionally voluntarily highlight the 'wheat':

spelt, spelt (wheat) or spelt (wheat)

Khorasan wheat

Khorasan wheat will be declared as 'Khorasan wheat' or 'Kamut Khorasan wheat' in the ingredients list. The Regulation requires the allergenic substance to be highlighted in the ingredients list; that is 'khorasan wheat':

Khorasan wheat or Kamut Khorasan wheat

(Kamut is the brand name which the producer of this wheat is insisting companies make reference to)

GLUTEN-FREE

With the exemption of sulphites, the Regulation does not set an amount below which an allergenic ingredient does not need to be declared. Therefore all cereals containing gluten need to be declared and highlighted in the ingredients list regardless of quantity.

One of the results of these provisions is that products containing less than 20ppm of gluten can claim to be gluten-free, and be sold as such. However cereals containing gluten in a quantity below 20ppm in products claiming to be gluten-free will need to be declared and highlighted in the ingredients list.

Example: CornFlakes

Ingredients: Maize, Sugar, **Barley** Malt Flavouring, Salt, Vitamins & Minerals: Niacin, Iron, Vitamin B6, Vitamin B2 (Riboflavin), Vitamin B1 (Thiamin), Folic Acid, Vitamin D, Vitamin B12

Foods claiming to be gluten – free should NOT use the Allergy Advice statement 'For Allergens, including cereals containing gluten, see ingredients in bold'. The Allergy Advice 'For allergens , see ingredient in bold', should be used for these products.

9. Contains

The Regulation does not require the allergen in the 'contains x' statement used for these products to be highlighted; however companies should consider this as best practice. This provides consistency with the manner in which allergen information is given in foodstuffs with an ingredients list.

11. Additives

Processing aids derived from a substance listed in Annex II used in the manufacture or preparation of a food and still present in the finished product, even if in altered form, must be indicated in the ingredients list.

When labelling lecithins derived from Annex II allergens, this should be indicated in the ingredients list.

Example: **soy** lecithin

12. Foods with no deliberate allergens

Foods with no allergens deliberately used in the recipe should not use any of the allergy boxes/advice/statements described in these guidance. However, allergy advice related to the potential cross contamination may have to be provided for these foodstuffs.

Example: Dark chocolate

Allergy Advice: May contain milk

EXAMPLES

Ingredients

Fortified **wheat** flour (**wheat** flour, iron, thiamin, nicotinic acid, calcium carbonate), Skimmed **milk**, Pasteurised free range whole **egg**, Smoked reformed bacon with added water (12%) (pork, water, maize starch, salt, maple syrup, preservative (sodium nitrite)), Vegetable oil (palm, rapeseed), Mild Cheddar cheese (**milk**) (7.2%), Medium fat soft cheese (**milk**), Single cream (**milk**), Gruyère cheese (**milk**), Maize starch, Maize flour, Onion, Salt, Calcium sulphate, White pepper, Nutmeg, Flour treatment agent (L-cysteine hydrochloride).

! ALLERGY ADVICE

For allergens, including cereals containing gluten, see ingredients in bold. May also contain celery, mustard and soya.

Ingredients

Wheat Flour, Tomato Purée, Water, Cooked Spicy Pulled Pork (14%), Mozzarella Cheese (**Milk**) (10%), Fried Onion (7%), Sugar, Olive Oil, White Vinegar, Smoked Ham, Salt, Dextrose, Malted **Wheat** Flour, Yeast, Flavouring, Seasoning, Modified Maize Starch, Maltodextrin, Caramelised Sugar Powder, Yeast Extract, Garlic Powder, Dried Oregano, Colour: Paprika Extract.

Cooked Spicy Pulled Pork contains: Pork, Brown Sugar, Garlic Powder, Onion Powder, Potato Starch, Salt, Oregano, Chilli Powder, Stabilisers: Diphosphates, Triphosphates.

Fried Onion contains: Onion, Sunflower Seed Oil.

Smoked Ham contains: Pork, Salt, Sugar, Dextrose, Antioxidants: Extracts of Rosemary, Ascorbic Acid; Spices, Preservatives: Potassium Nitrate, Sodium Nitrite.

Seasoning contains: Sugar, Spices, Mixed Herbs, Yeast Extract, Rapeseed Oil.

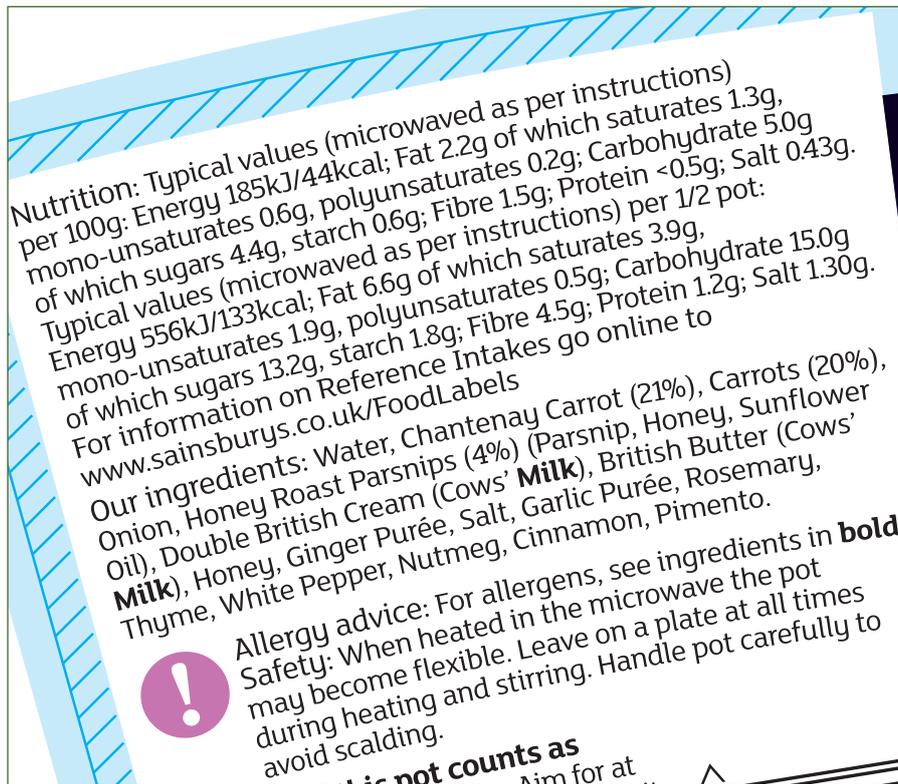
ALLERGY ADVICE: FOR ALLERGENS, SEE UNDERLINED INGREDIENTS IN BOLD. ALSO, MAY CONTAIN SOYA.

Ingredients

Seed Topped White Sub Roll (44%) (Fortified Wheat Flour (**Wheat** Flour, Calcium carbonate, Iron, Niacin, Thiamin), Water, Vegetable Oil (Rapeseed, Sunflower), Sugar, Yeast, Linseed, Millet, Poppy Seeds, Salt, Malted **Wheat** Flour, Flour Treatment Agent (Ascorbic acid), Glazing Agent (Potato Dextrin), Cornflour), Tuna (Skipjack Tuna (**Fish**), Salt), Salad Cream (7%) (Water, Rapeseed Oil, Sugar, Spirit Vinegar, **Egg** (Free Range), Dijon Mustard (Water, Black **Mustard** Seeds, Spirit Vinegar, Salt), Cornflour, Salt), Mayonnaise (4%) (Water, Rapeseed Oil, **Egg** Yolk (Free Range), Cornflour, Spirit Vinegar, Sugar, Dijon Mustard (Water, **Mustard** Seeds, Spirit Vinegar, Salt), White Wine Vinegar, Salt), Cucumber (4%), Spring Onion (3%), Yellow Pepper (3%), Red Pepper (3%), Red Onion (2%), Cornflour, Black Pepper, Seasoning (Ground Black Pepper, Salt, Dried Onion, Onion Powder, Yeast Extract Powder, Rice Flour, Garlic Powder, Sunflower Oil). 25% Tuna.

Allergy Advice

For allergens, including cereals containing gluten, see ingredients in **bold**. Also, may contain sesame seeds.



Our ingredients
 Cooked Pasta Shells (Durum **Wheat** Semolina, Water), Tomato, Skipjack Tuna (*Katsuwonus pelamis*) (**Fish**) (15%), Cows' **Milk**, Water, Mature Cheddar Cheese (Cows' **Milk**), Cherry Tomato (Cherry Tomato, Tomato Juice), Double Cream (Cows' **Milk**), Onion, Cornflour, Fortified British Wheat Flour (**Wheat** Flour, Calcium Carbonate, Iron, Niacin, Thiamin), Butter (Cows' **Milk**), Sugar, Sundried Tomato Purée (Sundried Tomato, Sunflower Oil, White Wine Vinegar, Sugar, Salt, Rosemary, Garlic, Basil, Black Pepper), Extra Virgin Olive Oil, Salt, Garlic, Parsley, Basil, Black Pepper, Nutmeg, White Pepper, Oregano, Bay.

 **Allergy advice**
 For allergens, including cereals containing gluten, see ingredients in **bold**.

Cheshire
 White Cheshire cheese.

! ALLERGY ADVICE
 Contains milk.