

UK PRE-PACKAGED FOOD INDUSTRY & LABELLING REGULATIONS- A COMPREHENSIVE STUDY OF ITS EVOLUTION

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Abstract- The expanding world economy, liberalization and globalisation has, on one hand, increased national and international trade of pre-packaged food but on the other hand, posed a challenge to initiate harmonization of the regulations of the food industry. To keep a check on the various malpractices, strict norms of labelling are being monitored from time to time as labelling is labelled as the most influential factor in assisting the consumers to make informed choices. It serves as a basic health tool to enlighten the customer about the nutritional values enabling them to refrain from the various health related problems and diseases. UK labelling regulations are considered to be quite exhaustive to answer all the health, environment and value for money related issues. They have quite stringent rules to monitor the various malpractices and thus prove to have an advanced and updated approach towards food labelling. Through this paper an attempt has been made to study the background of its food labelling laws, the ages when these regulations were introduced, how and when they took their shape and its evolving stages. By plunging into the history of UK food labelling regulations, an attempt has been made to study the impact of the past on the present labelling regulations in the liberalised and globalised era.

Key Words- Food Processing, Nutritional Labelling, Allergens, QUID, GMO, GDA

Introduction

Pre-packaged food industry is crossing all horizons and is being preferred, these days, in comparison to loose food material available in the market. The reason underlying is not always better quality but the credit goes to the food labels which when attached to the pre-packaged food serves the basic purpose of information of what exactly we're putting in our mouths. The Food labels were not so popular in earlier times but with the passage of time, people started realising their importance. Actually these food labels had gone through various phases of historical development. If we peep into history, most of the food was produced locally and consumed locally, nullifying the usage of food labels and hence their regulation. It was in the nineteenth century that industrialization of food production took place making consumers more reliant on food labels as a key factor in decision making while purchasing.

Although these food labels are heavily regulated and there are an array of exceptions, nuances and stipulations that govern them but nonetheless, consumer's interest groups will continue to demand more transparency and visibility from manufacturers. There are a number of regulations to cater to the requirements of the consumers but translating this wealth of information to a satisfactory decision is still complicated. Each country has its own specifications regarding its labelling requirements and may vary from one country to another in a number of aspects like the mandatory information that is needed to be placed on the label-name of the food. In some countries strict adherence and transparency is demanded while other countries may be little lenient in some aspects.

UK is a well developed economy and is considered to be highly modernised and advanced country. If we try to take a glance at its Food labelling system, it is covered under Food Standard Agency (FSA) which has been created to regulate their manufacture, storage, distribution, sale and import of the food products so as to ensure availability of safety and hygiene for human consumption. If we try to comprehend UK labelling scenario, we will realise that definitely it has made progressive moves. To have an idea of its advancements, we need to study its food labelling laws in detail along with its history to comprehend the scenario of their labelling regulations in terms of liberalised and globalised era.

Literature Review

Gorski Findling MT, et al (April 2018) tried to explore 1247 consumers on the basis of six conditions of single traffic light; multiple traffic light; no label control; Facts Up Front; NuVal; and 0–3 star ranking. **Wong Yu, et al (Dec 2016)** in their study have triggered the latest ongoing issue of problems faced by food allergic consumers and emphasised on the need to handle this issue with urgency as its prevalence is increasing on a fast pace. **Gaia Claudia Viviana Viola, et al (Dec 2016)** have tried to find an answer to the chronic health problems existing in today's era due to unhealthy eating habits not only in the western countries but also the developing countries growing economically. **David, Samji (Oct 2015)** in his study has focussed on a very important issue of adulteration bothering the world as a whole. **Kerr MA, et al (May 2015)** have extensively explored the impact of nutritional labelling on the decision making of the consumers across the Europe. **Peter Helfer & Thomas R. Shultz (2014)** have tried to compare four different labelling schemes so as study their impact on the usage and influence on the consumer decision making. **Stella Anne Cochrane, et al (Sept 2013)** investigated 500 food allergic consumers and 500 family members of allergic consumers who buy on their behalf of Great Britain online to understand their shopping behaviour. **Sally Malam, et al (May**

2009) carried out their research using random probability survey of 2932 shoppers of UK. Their research applied an integration of observational and quantitative work.

OBJECTIVES

This study aims at exploring, assessing and analysing the various aspects of labelling pre- packaged food of United Kingdom:

1. To study various aspects of pre-packaged food labelling regulations of UK.
2. To study the historical background of pre-packaged food labelling regulations of UK.

RESEARCH METHODOLOGY AND DESIGN

Data Collection- Since the nature of the present study is descriptive, data has been collected from secondary sources.

Research Design- Descriptive research design has been used in this study. This research is qualitative research.

Food Labelling Regulations in United Kingdom (UK)

The Food Standards Agency (FSA) is a non-ministerial government department of the government of the United Kingdom which works with local authorities to enforce food safety regulations and is responsible for protecting public health in relation to food safety and hygiene across the UK. It works for food safety, food standards, nutrition, food labelling in England, Wales and Northern Ireland. The Food Standards Agency had its national office in Scotland until April 2015 but shifted to Wales and Northern Ireland with its headquarters in London. Food Standards Agency, Scotland was established in 2015 who has taken over the responsibilities of the Food Standards Agency, in Scotland.

Background

13th- 16th century

Documented evidence proves that history of UK food labelling regulations dates back to 6000 BC when families normally produced as much food as was enough for themselves to exist and so consumer protection was not required. However, with the advancement of society, they started to produce on a larger scale and so needed to be sold and marketed. It was at this stage when problems like spoilage of food and transmission of diseases due to poor preparation and storage were encountered and this necessitated the protection of consumers from the various hazards instigated accidentally or deliberately. The basic problem faced was adulteration which mainly began with the bread flour which were contaminated by sand, sawdust, ash, mustard flour and even with ground animal bones for making it look whiter. With time, severity of this problem increased and efforts to regulate quality standards were put in by group of craftsmen, called the guilds. The efforts of these guilds were restricted to their towns and cities. To regulate on a broader scale first regulatory effort can be traced back to 1203, when King John enacted the Assize of Bread. Unfortunately, no proof or documentary evidence survived. However, the next step in this direction was when The Assize of Bread and Ale was adopted by the parliament and it became the first food regulatory law of British in 1266. The Parliament also enacted the Statute of the Pillory and Tumbrel shortly thereafter, which required every baker to have his own mark for his bread and to distinctly state the name of the owner on every measure, weight and every loaf of bread. This statute had set prices for different grades of bread and even approved particular grades of bread. It acted as a regulatory licensing system by imposing fees, fines and punishments to the law breakers and proved to be a historical example of affirmative food labelling. This law developed new skills and technology to keep a check on the weight, quality and price of bread and the marks used by the owner became a key regulatory mechanism to assist in its enforcement. As the number of brands increased, it became all the more difficult to exercise the control. So, these marks were replaced by the seal in the fourteenth and fifteenth century when every baker was required to label their loaves of bread with his own seal so as to easily identify the baker. Other foods products were also subjected to label marking regulations by the end of these centuries.

17th- 18th century

Although preventive measures were taken to control the adulteration but adulteration became the rule rather than the exception. Butter was considered as one of the most adulterated food item by the beginning of seventeenth century and so another statute was enacted in 1649 to regulate the adulteration in butter expecting every butter packer to mark his initials on the pack and to punish the guilty. Another statute in the same direction was enacted in 1662 requiring every butter pack to be marked with the first initials and full surname of the butter packer. Not only new statutes were added in the list but even amendments were made in the previous regulations to update the laws in accordance to the situations. Labelling took another baby step by passing another statute in 1749 asking every baker to follow more stringent regulations by marking large Roman WH upon every loaf of wheaten bread and a large Roman H on every loaf of household bread. To tighten the grip on the violators, a sum of 20s was also announced for the informers for their contribution in facilitating the enforcement.

19th century

Though a number of statutes were enacted and violators were located for their stringent enforcement, nothing could really make a change until the 19th Century. It was in 1820 when German chemist Frederick Accum through his book "The Treatise on Adulteration of Food and Culinary Poisons" tried to highlight the issue of adulteration and create awareness by giving a scientific base in detection adulterants within foods and drink. His book gained popularity within a month and its copies were sold like hot cakes. This motivated him to reprint his book with the addition of exhibiting the fraudulent practice even in milk, isinglass, cinnamon, and Spanish liquorice juice. This popularity further propelled him to expose the wrongdoers by publishing their names and addresses. But this time his fame won him some powerful enemies who concocted a plan to defame him by informing the false statement about his borrowing and damaging the books of the Royal Institution of Great Britain to the police. He was

charged and arrested for the crime which ruined his reputation. Though he was granted bail but he left for his home town in Germany. This further gave a boost to the adulteration for next 30 years till the time of Industrial Revolution in 1850 when reliance on food retailers increased.

It was during this time, a new campaign headed by Thomas Wakley, a surgeon, MP and editor of 'The Lancet' the medical weekly started to blow the culprits against the adulteration of food and drugs. In continuation of the efforts of Accum, Wakely through his articles again attacked the poisonous items used in adulterating the eatables. His article acted as a spark in initiating the struggle against exposing the dangers and the offenders. In 1850, after the statement given by the Chancellor of the Exchequer, Sir Charles Wood, that no chemical or test could detect chicory in coffee, a London based physician, Arthur Hill Hassall conducted extensive work on samples of food and drinks purchased from the marketplace to prove how false the above statement was. This teamwork of Wakely and Hassall between 1851 and 1854 brought wonders as Hassall analysed the samples and Wakely published Hassall's results without any modification with the names of the accused vendors. This brought Parliamentary Committee of Inquiry into action who tried to seek information from many witnesses. Ultimately, the first Food Adulteration Act was passed in 1860 which was an exemplary move to secure legislation to protect the public. It was a historical moment but most of the Hassall's recommendations for the appointment of food inspectors and treatment of convicted adulterators were not accepted. Hassall was further criticized in a book named "Enquire within upon everything" published in 1860 for creating unnecessary hue and cry without having a practical solution.

The Food Adulteration Act 1860, instead of compelling the councils, only allowed them the permission to appoint the analysts. This was the major deficiency of this Act which although an important measure of nineteenth century but needed to be reformed. It was then revised in 1872 after incorporating of Hassall's proposal. In 1874, Hassall was appointed the first president of newly formed Society of Public Analysts to keep a check on the working of 1872 Act. His report formed the basis of a new Act that came into existence in 1875 known as the Sale of Food and Drugs Act, 1875 which underlined the basis of the modern legislation. It was further amended in 1879, and the second chief amendment to the 1875 legislation came up with the introduction of Margarine Act of 1885 which dealt with the fraudulent practices followed in the sale of margarine as butter. Later in 1899, another amendment led to the Food adulteration Act of 1899 which made seller responsible for whatever food item he was selling, assuming it impossible for the buyer to keep a track in the industrialised age of food revolution.

20th century

Early 20th Century too went through this trend of adulteration with further noticeable impact on the health causing various kinds of food borne illness making it mandatory to recognise the statutes ensuring food quality and safety. One of the major statutes to control contamination in dairy products was passed in 1914 as The Milk and Dairies Act 1914 which covered the production and sale of clean and safe milk for human consumption. It also covered all the aspects of dairies, milk handling, processing etc. It not only prohibited sale of milk from diseased cows but also selling of imitation cream as cream. Another act i.e. The Food and Drugs (Adulterations) Act 1928 was passed few years after the end of the First World War which consolidated earlier six Sale of Food and Drugs Acts with a purpose to simplify the provisions and make earlier provisions easier to enforce and to look into the genuineness of milk, cream, butter or cheese. It was in this century that labelling regulations were enforced which gave a new direction to the statutes. To further penalise false and misleading labelling and advertisement, the Food and Drugs Act 1938 was introduced. Then in 1943 the government introduced The Defence (Sale of Food) Regulations 1943 which required every pre-packed food to bear a label specifying the name of the food item, the name and address of the packer, the quantity of food in the package and the ingredients. Another major step was taken in 1955 to control the food composition, its labelling and maintaining hygiene with the introduction of the Food and Drugs act 1955 which allowed the sale of only those food items which are fit for consumption and that too with proper labelling. It even forced the closure of the premises selling food unfit for consumption. Then the "Weights and Measures Act 1963 covered all the aspects of weighing and measuring different kinds of fresh or pre-packed food thereby taking the regulations to the level of establishing certain food standards, prevention of contaminants, controlling additives, labelling control measures, hygiene check-ups, and weight and measure inspections.

1968 witnessed two very important changes within food law. The legislations regarding food and control of medicines for the human and veterinary were segregated by the Medicines Act 1968 and The Trade Descriptions Act 1968 introduced fresh rulings for impounding false claims, misleading advertising, wrong indications regarding the price or the use of unauthorised emblems. The next major change that brought about revolution in the food laws in UK was the introduction of the Food Act 1984. This Act played the major role as it consolidated the various previous food safety provisions like Food and Drugs Acts 1955 to 1982, the Sugar Act 1956, the Food and Drugs (Milk) Act 1970 and other connected provisions. Although it brought major reforms but because it failed to impose sufficient safety standards and missed out important words like 'hazard' and 'safety' within its preview, it could not stand for long and after amendments and extensive redrafting took the form of the Food Safety Act of 1990. Weights and Measures Act, 1985 was another measure to keep a check on fraudulent practices. It required all the pre-packed food articles, to bear on their containers, the indication of its net weight or volume. It even restricted the quantities, known as the prescribed ranges, in which these pre-packed goods may be packed. They need to satisfy the average system of quantity control to be declared by an indication by the symbol "e" placed next to the weight declaration. Then, followed the year 1989, the year marked with higher rate of contamination, which took a shape of Listeria, the food borne illness, which hit the headlines. It caused a major reason of concern and a wide range of food types were found to be associated with it which required European Union to adopt directives for the official control of the food stuff. By the next year, another ruling under the name of The Food Safety Act 1990 was established which provided all the food legislations in written form and whose majority of the provisions apply even today, though with amendments. This Act was equipped with the conditioning of food safety, food quality and trading standards. It was geared to keep a check on the food injurious to health, restricting selling food not fulfilling food safety requirements, imposing penalties for selling food of sub standard quality and for not complying with what is demanded and for false description

and specification of food to ensure food safety and consumer protection. Even the legality of irradiated food in UK in 1991 further emphasised on the safety of food. The Food Safety (Northern Ireland) Order as amended in 1991, also aimed at ensuring the nature, substance and quality of food as per customers' expectations without any misleading presentation. This year was earmarked for the beginning of the nutritional labelling, a major breakthrough in this direction. Dietary Reference Values (DRVs) were set up for energy, protein, fats, sugars, starches, non-polysaccharides (NPS), 13 vitamins, 15 minerals and considered 18 other minerals. Organic Products Regulations 1992, Food Additives Labelling Regulations 1992, Flavourings in Food Regulations 1992, Colours in Food Regulations 1995, Sweeteners in Food Regulations 1995 and Bread and Flour Regulations 1995 were the other advancements made during next four years.

Nutritional labelling took a step further by initiating the use of Daily Guideline Intakes (DGIs) for fat, saturates (saturated fat), sodium, sugar and fibre in grams per day for men and women in the year 1996. Another achievement of this year was the Food Labelling Regulations of 1996 where the basic purpose of its framework was to begin a batch (common lot) identification system to help trace and identify the product throughout its journey from farm to fork. The mark, prefixed with the letter "L", must be clearly visible, legible and indelible. These regulations made it mandatory for all the pre-packed food items to be properly labelled with its name, list of ingredients, its durability, storage conditions, the name and address of the manufacturer or packer or of a seller, place of origin and instructions for use. QUID (quantitative ingredient declarations) another initiative of this year was also a part of the Food Labelling Regulations of 1996 as an informal, non statutory guidance which specified the names for the ingredients to be mentioned in the ingredients list and their quantities to be expressed in the ingredients list in a percentage. However, the Bread and Flour Regulations of 1995 was replaced and revoked by the Bread and Flour Regulations 1998, with the aim to allow free movement of goods to encourage transparency. It fulfilled long standing requirement of the country, by laying down labelling and compositional standards for restoring vitamins and minerals in the breads and the flours manufactured and sold in UK. During this year, nutritional labelling further helped in developing a set of GDAs (Guideline daily amount) for communicating the Government's recommendations about nutrient intake as nutritional information on the back of food packs. Even values for calories, fat and saturates (saturated fat) for men and women were also set by the Institute of Grocery Distribution (IGD) with a collaboration of UK government with consumer organisations and the food industry on the recommendations of the 1991 COMA report.

The Food Safety Act 1990 was upgraded and took the shape of the Food Standard Act of 1999 which brought a major change in the history of food regulations. The enforcement of food laws until then had been the subject of controversy, overlaps, conflicting objectives or incoherence and the government felt the urgent need to set up a separate agency to promote high standards throughout the food chain and control its effectiveness from the point of production to the point of consumption. Its main objective was to establish 'The Food Standards Agency: A Force for Change' and authorise it with the required functions and powers in relation to food safety and standards for protecting public health and looking into the interests of the consumers in all stages of food production and supply chain.

21st century

Finally, with the advent of twenty first century, The Food Standards Agency (FSA) came into existence on 1 April 2000 who worked as a government department, independent regulator and consumer protection body for providing reliable and up-to-date information to help consumers make healthy choices about food and are free to publish any advice without any need to report to a specific minister although it is accountable to Parliament through health ministers. Since its incorporation the Agency had been working towards the well being of consumers and improving the label clarity and so it came up with its first Clear Food Labelling Guidance in 2002, which advised on achieving on improving labelling practices after identifying three areas of difficulty i.e. finding information; reading it; and understanding how to use it. Later in 2003, the Agency to take its mission ahead launched its Eatwell website comprising of an 'interactive label' to enable the users to learn to use the information provided on labels. FSA also published General Food Law Regulations in 2002, prohibiting unsafe and unfit food to be sold in the market and also highlighting the issue of traceability by guiding to keep the records of the address of customers or suppliers; nature and quantity of products and date of transaction and delivery. It took the initiative in the direction of "Allergen Labelling" by giving the advisory instructions to the customers asking them to be cautious of what kind of food can cause problems and identifying the list of 14 most common allergens which need to be taken care of which included cereals containing gluten; crustaceans, for example prawns; crabs, lobster and crayfish; eggs; fish; peanuts; soybeans; milk; nuts, such as almonds, hazelnuts, walnuts, pecan nuts, Brazil nuts, pistachio, cashew and macadamia nuts; celery (and celeriac); mustard; sesame; sulphur dioxide, which is a preservative found in some dried fruit; lupine and molluscs, for example clams, mussels, whelks, oysters, snails and squid. However, it was in the year 2004 when the Food Labelling Requirements made it mandatory to declare allergens, additives and irradiated ingredients on the label, in accordance with food labelling and allergen labelling regulations.

On 25th November, 2004, the Food labelling Regulations (Northern Ireland) came into operation which altogether changed the definition of food as was earlier presented in Food Safety Act 1990. It adopted HACCP (Hazard Analysis Critical Control Point) as the vital hazard prevention tool and a basic legal requirement for the food safety within the food industry, thus, focussing on the ingredients present in the foodstuffs making declaration of ingredients including additives a compulsion. These regulations emphasised on clearly naming of the ingredients listed in the Schedule AA1 attached and also required clear mentioning of the ingredients making up of more than 2% of the finished product which was earlier restricted to 25%. Although the new regulations did not carry any compulsion to show 'may contain' or 'nut trace warnings' but due to the concern raised by the consumers regarding the inappropriate use of nut trace warnings restricting consumer's choice, led many manufacturers and retailers to voluntarily take up the issue and indicate the possible presence of the ingredients that people may be allergic to. So the products were required to specify the presence of the allergens but there were no fixed rules for the declaration of full ingredient list by

2004. Another focus during 2004 was on reducing obesity as it was considered as a priority area by the government for improving the health of the nation and to serve the purpose, clearer food labelling was again the target.

New technical group comprising of scientific experts and food chain and the Food and Drink Federation (FDF) representatives, was set up in 2005 by the Institute of Grocery Distribution (IGD) to further improve the GDAs developed in 1998 and ultimately it led to the back-of-pack GDA scheme as a guide to the amount of nutrients a person should intake in a day. These GDA values when released by IGD influenced many supermarkets which began to declare GDAs for calories, fat, sugars, saturates (saturated fat) and salt on back of pack which brought a new revolution in the nutritional labelling followed by the research by the Tesco regarding options for nutritional signposting on the front of pack. This too was adopted by several food manufacturers which on one hand helped to decrease the sale of less healthy options and increase the sales of healthier varieties thereby giving an impetus to a healthier life style.

With the similar motive, another legislation, The Food Hygiene Regulations 2006, which came into force on 11 January 2006 applied on all the four countries of UK placed an obligation on all in the food business to ensure that all their activities from farm to fork are carried out in a hygienic way and if they provide anything which is harmful or unsafe to be consumed will invite penalties. This regulation required following strict principles based on Hazard Analysis Critical Control Point (HACCP) and reviewing from time to time so as to avoid default in compliance. Hygiene was required to be maintained even in the food premises by providing adequate hand washing facilities, supply of drinking water, proper lighting, ventilation and drainage with proper pest control to serve the purpose. Not only hygiene but awareness was another issue which was tried to be coped up with during this phase. The Food Standards Agency tried to promote its practices so as to enable consumers to have informed choices. It tried to give another angle to its efforts by issuing guidelines to the consumers in the form of a publication of its proposal of "Food Information to the Consumers" in 2008 as the Agency's research have confirmed that many consumers were finding food labels difficult to use. So the need was felt to simplify and clarify the food labels and the outcome was this revision, which substituted the guidelines earlier published in 2002. This proposal was issued on 4th February 2008 but was subject to scrutiny by the European Parliament, who finally approved it on 6th July 2011. This FIR improvised the rulings of both general and nutritional labelling out of which general labelling requirements could be brought into force in 2014 and nutritional labelling in 2016.

The best practice advice given in this legislation highlights the wide range of factors contributing towards the clarity, specifying what and how exactly the information is to be placed on the labels. This advice kept visually impaired consumers into consideration while framing this regulation. It also aimed at bringing clarity so as to provide clear guidelines to manufacturers, producers and retailers. Even these guidelines will help enforcement authorities to access and enforce the labelling legislation. Although this best practice advice was voluntary to follow but it provided with the meaningful information on the aspects of grouping, Font size, Type, Format, Contrast and Quality, Prioritisation, Layout, Consistency, Format of Date Marking, Allergen Information and Format of Nutrition Labelling, QUID, Origin information, Information about how to contact the manufacturer, etc. The scope of the regulation included both mandatory and voluntary issues. Name of the food, List of ingredients, Allergens, Quantity of certain ingredients, Net quantity, Date of minimum durability, Special storage conditions, Name and address of seller, Country of origin, Instructions for use, Alcoholic strength and Nutrition declaration were the issues listed in mandatory labelling and were to follow the guidelines related to font size and were to be given priority over voluntary nutrition declarations. Energy value only or Energy, Fat, Saturates, Sugar, Salt with reference to intake of an average adult was part of the voluntary nutritional information that could be placed on the front of the pack. This FIR also talked about Traffic Light Label Colours and instructions were issued that only the lozenges for the information of fat, saturates, sugars and salt need to be coloured and that too with vibrant colours instead of the pastels. The shade, tone and intensity of the colours should be used considering the contrast so that clarity and legibility of the information is maintained and for this at least one third of the lozenge need to be coloured. The regulation also defined the location where information was to be placed. As per the guidelines, the manufacturer needs to provide the information in the principal field of vision i.e., the place which the consumer most likely sees at the first glance to grab the vital information.

This best practice guidance was of great help not only for the general and visually impaired consumers but was also compassionate towards allergic and provided clear guidelines for the traceability and labelling of food allergens, GMOs, GM food and food colours to help avoid cross contamination. These guidelines clearly mentioned that presence of allergen within the product must be declared using a word 'Contains' followed by listing it in the name of the ingredients and distinguishing it from the rest of the ingredients by means of font, style or background colour. They even highlighted the use of advisory (May contain) labelling for ensuring consistent and transparent labelling, making pre-packaged food labelling allergic friendly. Finally, a new law was introduced in 2009 on the labelling of gluten free foods setting clear gluten levels, specifying which products can be categorised under the category of 'gluten free' and which products under 'very low gluten' category. According to this law, only the foods which contained gluten less than 20 parts per million (ppm) could be stamped 'gluten free' and the claim of 'very low gluten' can only be made for the food containing less than 100ppm gluten. The manufacturers were given three years of time to bring about the changes as the law became mandatory in 2012 and any food found to be not complying with the guidelines was ordered to be removed from the shelf. This law brought great relief to the consumers intolerant to gluten as they were suffering a lot because of lack of clear labelling policies.

In 2013, The Food Safety and Hygiene Regulations came in to force applying effective controls throughout the food chain making it obligatory to carry out all the activities in a hygienic way and to supply safe and healthy food, failing which makes it an offence. These regulations revoked and replaced the Food Hygiene Regulations 2006 and General Food Regulations 2004 with a single statutory instrument. In the same year the voluntary scheme of "traffic light" nutrition labels that was introduced by the Department of Health could see the result by showing salt, sugar and fat content in red, amber and green colour depending upon the quantity of content. Although this traffic light scheme proved to be quite useful and helpful for its clear and at-a-glance information system and UK was leading in its adoption but still the need was felt to make it mandatory as the labels were not

famous with about one third of the food sold in the UK. It was in 2014 that Food Information for consumers which was introduced in 2008 finally took a shape of a new legislation, making labelling more informative for allergic consumers by phasing out the allergy boxes and making its place in the ingredients list which is assumed to be an important place in the food labelling. By the year 2016, even Nutritional labelling regulations as per FIR could take the shape of a new legislation to help consumers get an overview of the nutrition available in the product and to make producers make an effort in this direction. In 2016, an attempt was made to bring 'Organic food labelling' under the strict adherence of the regulations and for that a product if need to be labelled as 'organic' or 'organically grown' had to include in its label its Certification code, Certification symbol, EU organic logo, the origin of raw materials, and its traceability code. A product cannot be labelled organic if its ingredients are more than 5% non-organic. Its efforts continued in 2017 with the European commission adopting a notice on 13th July, 2017 updating the guidance issued earlier on providing information regarding the substances or products causing allergies to assist the consumers in better understanding the regulations. On 20 November 2017, the Commission adopted another notice aligning the guidelines of 1998 and regulations of 2011 on quantitative ingredients declaration (QUID) so as to equip the consumer with every kind of information he may need to seek to make the right and healthy choice.

All these efforts were being made from time to time to bring about a fairly consistent food law and a system to regulate and strengthen the rules to prevent misleading practices. Still there is no looking back and UK is advancing ahead of other countries in adapting to the latest requirements and making food labelling allergic and non-allergic consumer friendly.

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