



FIR FAQs - Food Information Regulations FAQs



Ten things you need to know about FIR

1. When does it come into force?

The new Food Information Regulations will change the terms of food labelling for consumers from 13 December 2014 - mandatory information (including for allergens) and any voluntary nutrition labelling (if front of pack) in prescribed terms and format. From 13 December 2016, nutrition labelling will be mandatory.

2. Who is affected?

FBO's at all stages in the supply chain, whether for the final consumer or mass caterers, pre-packed or not. Buyers will need to know ingredients in supplies to them, just as suppliers need to know what they are supplying

3. Where do I find the mandatory particulars?

See EU Regulation 1169/2011 (follow the link at the end) and in particular Annex II – allergen information.

4. How do I show the presence of allergens?

These must be listed and distinguished from other ingredients through use of FONT, *style* or colour

5. How do I comply in time?

Firstly, you or someone in your organisation should be appointed to be the 'FIR champion' – it has to be someone's job. Have that person review product lines and identify allergen and other information. Store on a database, and maintain it – especially when recipes change.

6. What product lines are affected?

With only a very few exceptions (e.g. for chewing gum) – potentially all of them. Not all will contain allergens – but if they do, the information needs to be provided in a new way. The labelling changes are not just limited to allergen information. You need to know what to do with all your product lines.

7. I sell food online, will FIR apply?

Yes. The labelling information must be made available at the 'point of sale' and in any event with the delivery.

8. I only supply other wholesalers. What do I need to do?

You still need to comply. Liability for FIR has the potential to pass up and down the food chain – information has to accompany goods destined for final consumers or caterers via accompanying commercial documents (see Article 8, FIR). You are also very likely to be audited by your buyers for FIR compliance – and you should yourself audit those supplying you.

9. What if my products don't comply with FIR?

Subject to a grace period for goods labelled and ready for sale before, but sold after, 13 December 2014, it will be an offence to market these, and in addition, the food products could be withdrawn from sale and need to be relabelled and/or even destroyed even where there is no safety issue. There is no reason to think the powers will be exercised harshly but it is a step change. If product is withdrawn this could give rise to significant liability within the supply chain. The new agency Food Standards Scotland will monitor enforcement activity.



10. Help! Who do I speak to?

Monitoring in Scotland will be via Environmental Health Officers. You are recommended to seek guidance for any 'mock' labels before bulk ordering - but there is no process for formal approval. There are various online sources of help available:

The Food Standards Agency (food.gov.uk); especially their online training portal.

www.food.gov.uk/enforcement/enforcetrainfund/onlinetraining/food-labelling-training-online/

British Retail consortium guidance on Food Allergens

www.brc.org.uk/downloads/Guidance%20on%20Allergen%20Labelling.pdf

EU Regulation 1169/2011

http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/proposed_legislation_en.htm

For guidance on supply chain implications and for any further information e.g. on the new Food (Scotland) Bill, contact george.frier@shepwedd.co.uk or visit www.shepwedd.co.uk.

Disclaimer

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