


# Efficiency in the compliance and labelling process

Allowing you to focus on what matters



# Agenda

- 1 The importance of food compliance
- 2 One approach



# The importance of food compliance

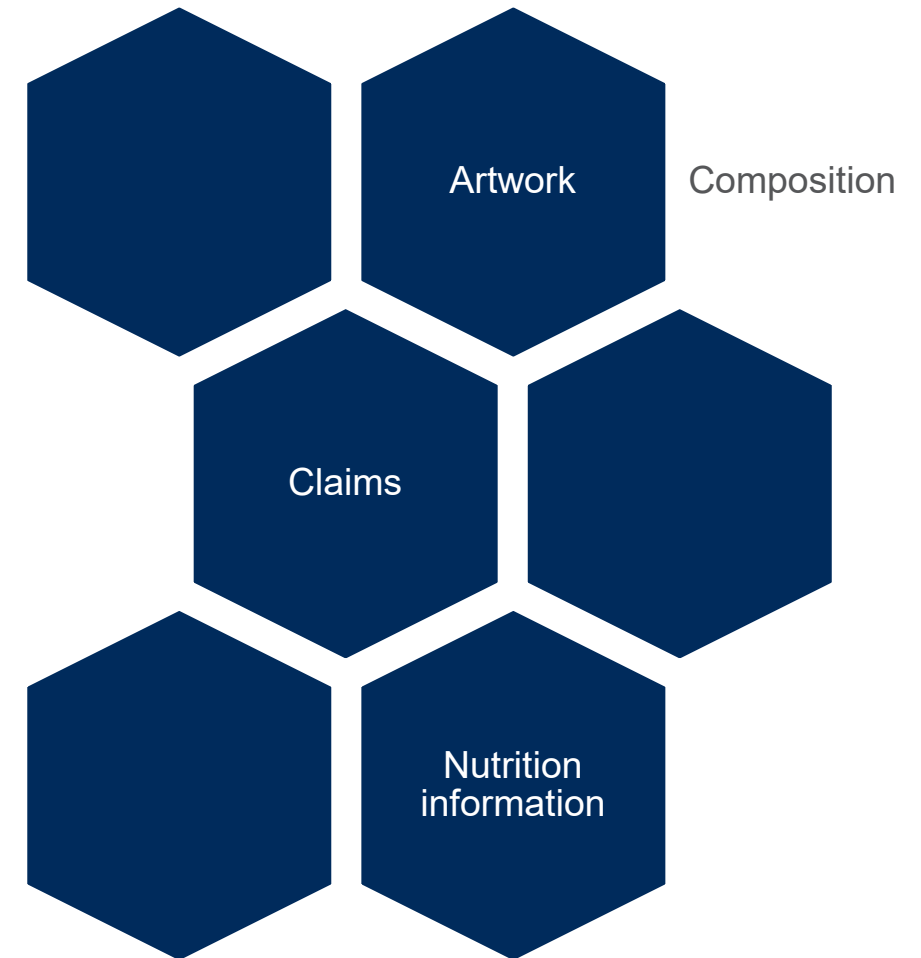
# Key concerns



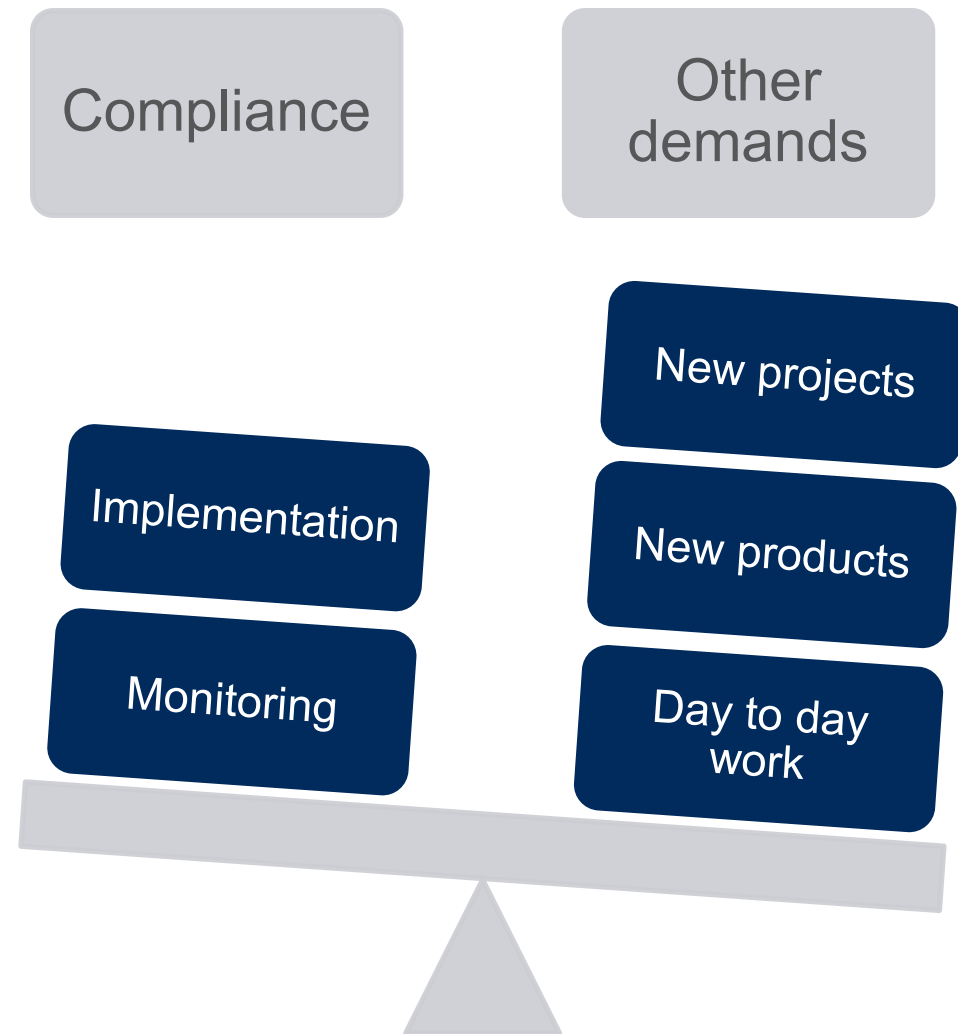


# Food Compliance

- Designed to both protect the end consumer and ensure **fair market practices**
- Continued **evolution** and introduction of new and more **restrictive standards**
- Lack of **alignment** between markets
- Cost of **non-compliance** can be significant (Fine and Reputation)



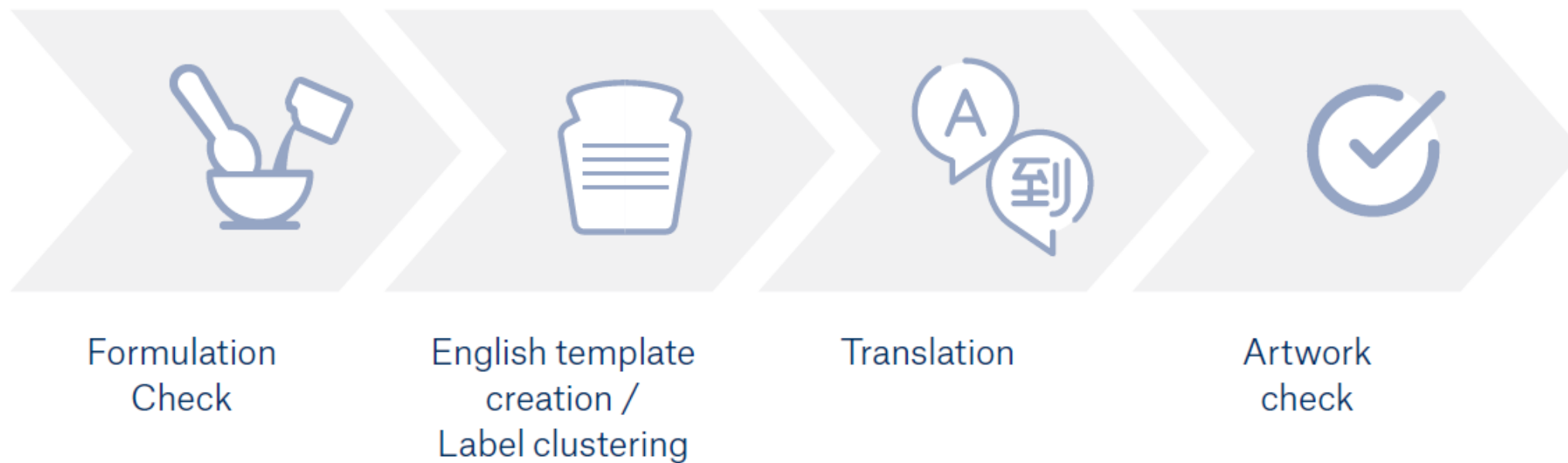
# Is outsourcing the answer?



A woman with dark hair in a ponytail, wearing a light blue tank top and purple shorts, is climbing a vertical rock face. She is using her hands and feet to grip the rock. A small bag is hanging from her waist. The background is a vast sky filled with large, white and grey clouds.

# One approach

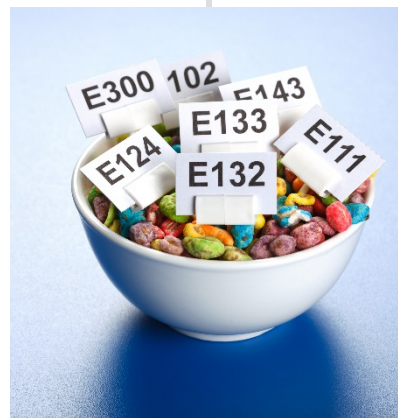
# The process





# Stage 1: Formulation check

Additives



Flavourings



Compositional  
standards



# Example of formulation check

		EU		GCC		Switzerland	
Overall acceptability of product formulation		YES		NO	Pork products are strictly prohibited. INS 202 is not permitted in Soft candy in GCC except UAE	YES	
Ingredients	Sub-ingredients	Permissibility (YES/NO)	Where permitted, maximum level	Permissibility (YES/NO)	Where permitted, maximum level	Permissibility (YES/NO)	Where permitted, maximum level
Glyucose Syrup		Yes	GMP	YES	As normal ingredient, no maximum limit laid down	YES	
Sugar		Yes	GMP	YES	As normal ingredient, no maximum limit laid down	YES	
Starch maize starch (declaration within EU), acid thinned starch (declared as modified starch outside EU)		Yes	GMP	YES	As normal ingredient, no maximum limit laid down	YES	
Pork Gelatin		Yes	GMP	NO		YES	Yes require Dec
Invert sugar syrup		Yes	GMP	YES	As normal ingredient, no maximum limit laid down	YES	

Markets	Permissibility	Other conditions
EU	YES	
GCC	NO	Pork products are strictly prohibited. INS 202 is not permitted in Soft candy in GCC except UAE
Switzerland	YES	
China	NO	Potassium hydroxide is not permitted for use in candy
Hong-Kong	NO	Potassium sorbate is not permitted for use in candy
Jordan	NO	Pork products are strictly prohibited
Japan	NO	E202 is not permitted in E141
Morocco	?	The presence of pork gelatine may be acceptable bear in mind that the vast majority of product in Morocco are Halal and so will not contain such ingredient
Norway	YES	
Russia	NO	Carrier used in additives are not permitted.
Taiwan	NO	Potassium sorbate is not permitted for use in candy

# Right answer?

We want to sell our great new and innovative product in all EU MS, USA, Japan, Turkey and Russia and would like to have only one label ? It's already sold in Canada

OK just use your current Canadian Label and translate it in all the language of the country of interest

leatherhead  
food research

251,5



# Stage 2: Creation of an English label template and clustering

	A	B	C	D
		<b>Legal Label</b>	<b>EU</b>	
1				
2				
3	<b>Product name</b>			
4				
12				
13	<b>Template for translation:</b>	<b>Template</b>	<b>EN</b>	
14	<b>Family name (not to be translated)</b>			
15	<b>Legal name</b>			
16	<b>Ingredients</b>			
17				
18	<b>Allergens infos</b>			
19	<b>Net weight</b>			
20	<b>Storage conditions</b>			
21	<b>Instruction for use:</b>			
22	<b>Best before</b>			
23	<b>Production date</b>			
24	<b>Producer information</b>			
25	<b>Claims</b> (please check each claim and provide information whether the claim is allowed to be used and provide corresponding requirements for each if available).			
26				
27	<b>Warning Statements</b>			
28	<b>Nutrition Information</b>			
29			<b>Comments EN</b>	
	<div> <div>←</div> <div>→</div> <div>Cover</div> <div>EU</div> <div>TR</div> <div>JP</div> <div>RU</div> <div>US</div> <div>+</div> </div>			

# Example of clustering

Labelling aspects	Considerations
Font size	<p>Please ensure when combined, the most strict font size rules should be complied with. Both XX and XX require a minimum font size of x mm for all information displayed on the label except net weight. In addition, XX requires the information related to the expiry date to be provided with a size of x mm.</p> <p>I understand that it is highly likely that the above requirements are met.</p>
Language	All countries of interest require the labels to be in Spanish.
Position of labelling information	<p>All countries require the name of the product and the net content to be declared on the same field of vision on the main display panel. In addition, the brand name is also required in XX and XX to be provided on the same display panel and therefore on the same field of vision.</p> <p>In order to comply with all countries requirements, the following information should be displayed on the same field of vision on the main display panel: name of the product, net content, brand name and quality information if applicable.</p>
Product name	All countries require the name of the product to be that established in the applicable legal orders. Unless different countries establish different product names for specific products, we understand that to find an adequate product name for all these countries could be possible.
Ingredients	<p>All countries require a list of ingredients which should be declared in descending order of weight.</p> <p>The word 'ingredients' should precede the declaration of ingredients in order to comply with all countries' requirements.</p> <p>It seems that the above requirements are in compliance with national legislation for all countries.</p>
Declaration of fortified flour	<p>A common wording for the declaration of x flour is not possible for the countries of interest. In XX, XX and XX the wording 'xxxxxx' should be used and in XX and XX the wording 'xx xx' should be used.</p> <p>As the terms 'xx' and 'xx' have a similar meaning in Spanish, the use of one or the other term may be acceptable in these countries.</p> <p>Unfortunately, XX and XX have very specific requirements which cannot be combined.</p> <p>In this case, the best option would be to have different lists of ingredients in order to meet all these requirements.</p> <p>Please consider that we are not commenting on the possibility of using the same flour enrichment for all these countries but only on the labelling aspects derived from the use of fortified flour.</p>
Allergens	<p>The list of allergens is mostly the same in all countries. Some exceptions exist in some markets but a combination problem could be avoided if you declare all ingredients derived from allergens included those exempted in some countries.</p> <p>XX, XX and XX do not establish any specific prescribed manner to declare allergens. Therefore, their declaration in the list of ingredients should suffice (recommended in highlighted characters).</p> <p>Therefore, a combination of all countries following the above instructions is possible.</p>

Stage 3:  
Creation of  
native  
language  
labels

Template for translation:	Template	EN	DE	FR	IT	
Family name (not to be translated)						
Storytelling (marketing text)		-	-	-	-	-
Commercial name (not to be translated)	Cinnamon buns, frozen, ready to bake	Cinnamon buns, quick-frozen, ready to bake	Cinnamon buns, quick-frozen, ready to bake	Cinnamon buns, quick-frozen, ready to bake	Cinnamon buns, quick-frozen, ready to bake	Cinnamon buns, quick-frozen, ready to bake
Legal name	Cinnamon buns, frozen, ready to bake	Cinnamon buns, quick-frozen, ready to bake	Zimtschnecken, tiefgefroren, backfertig	Pains à la cannelle, surgelé, prêts à cuire	Brioche alla cannella, surgelate, pronte da cuocere	Bolitos de canela, congelados, listos para hornear
Ingredients	Ingredients: Wheat flour, water, sugar, margarine (palm oil, coconut oil, shea oil, water, salt, emulsifier [E471], flavouring), yeast, salt, cardamom, filling (vanilla custard (water, sugar, modified potato starch, whey powder (milk), fat powder [coconut oil, glucose syrup, milk protein, stabiliser [E451]], thickener [E401], natural vanilla flavour, salt), margarine (palm oil, coconut oil, shea oil, water, salt, emulsifier [E471], flavouring), brown sugar, sucrose syrup, icing sugar, cinnamon (2.8%), vanillin sugar (, modified starch, decoration. Decoration sugar (sugar, rapeseed oil), bread glaze (water, maltodextrin, potato starch, wheat starch, glucose).	Ingredients: Wheat flour, water, sugar, margarine [vegetable oils (palm, coconut, shea), water, salt, emulsifier (E471), flavouring], vanilla custard [water, sugar, thickener (E1414, E401), whey powder (milk), coconut oil, glucose syrup, milk protein, stabiliser (E451), natural vanilla flavouring, salt], yeast, cinnamon (2.8%), rapeseed oil, maltodextrin, potato starch, wheat starch, glucose, thickener (E1414), salt, cardamom, vanillin.	Zutaten: Weizenmehl, Wasser, Zucker, Margarine [pflanzliche Öle (Palm, Kokosnuss, Shea), Wasser, Salz, Emulgator (E471), Aroma], Vanille-Creme [Wasser, Zucker, Verdickungsmittel (E1414, E401), Molkenpulver (Milch), Kokosnussöl, Glukosesirup, Milchprotein, Stabilisator (E451), natürliches Vanillearoma, Salz], Hefe, Zimt (2.8%), Rapsöl, Maltodextrin, Kartoffelstärke, Weizenstärke, Glukose, Verdickungsmittel (E1414), Salz, Kardamom, Vanillin.	Ingédients : Farine de blé, eau, sucre, margarine [huile végétale (palme, noix de coco, karité), eau, sel, émulsifiant (E471), arôme], crème anglaise vanillée [eau, sucre, épaississant (E1414, E401), lactosérum en poudre (lait), huile de noix de coco, sirop de glucose, protéine de lait, stabilisant (E451), arôme naturel de vanille, sel], levure, cannelle (2.8%), huile de colza, maltodextrine, amidon de pomme de terre, amidon de blé, glucose, épaississant (E1414), sel, cardamome, vanilline.	Ingredienti: Farina di frumento, acqua, zucchero, margarina [oli vegetali (palma, cocco, shea), acqua, sale, emulsionante (E471), aroma], crema alla vaniglia [acqua, zucchero, addensante (E1414, E401), siero di latte in polvere, olio di cocco, sciroppo di glucosio, proteine del latte, stabilizzante (E451), aroma naturale di vaniglia, sale], lievito, cannella (2.8%), olio di colza, maltodestrina, amido di patate, amido di frumento, glucosio, addensante (E1414), sale, cardamomo, vanillina.	Ingredienti: Harina de trigo, agua, azúcar, margarina [aceites vegetales (palma, coco, shea), agua, sal, crema de leche, estabilizante (E451), aroma natural de vainilla, sal], levadura, canela (2.8%), aceite de colza, maltodextrina, almidón de papa, almidón de trigo, glucosa, espesante (E1414), sal, cardamomo, vainillina.
Allergens infos	Contains gluten, milk.	-	-	-	-	-
Net weight	Net: 510g	Net weight: 510g	Nettogewicht: 510g	Poids net : 510g	Peso netto: 510g	Peso neto: 510g
Storage conditions	Storage: Keep frozen at -18 °C or below. Do not refreeze once defrosted.	Storage: Keep frozen at -18 °C or below. Do not refreeze once defrosted.	Lagerbedingungen: Gefroren bei -18 °C oder kälter lagern. Nach dem Auftauen nicht wieder einfrieren.	Conservation : Garder congelé à -18 ° C ou moins. Ne pas recongeler une fois décongelé.	Conservazione: Conservare congelato a -18 ° C o inferiore. Non ricongelare una volta scongelato.	Conservación: Mantener congelado a -18 ° C o inferior. No recongelar una vez descongelado.
Instruction for use:	Preparation: Heat oven to 170 – 190 °C. Place the frozen cinnamon buns directly on a baking tray and bake in the middle of the oven for 14–16 minutes.	Preparation: Heat oven to 170 – 190 °C. Place the frozen cinnamon buns directly on a baking tray and bake in the middle of the oven for 14–16 minutes.	Zubereitung: Backofen auf 170 - 190°C vorheizen. Die gefrorenen Zimtschnecken direkt auf ein Backblech legen und in der Mitte des Ofens für 14 - 16 Minuten backen.	Préparation : Au Four : Préchauffer à 170-190°C. Placer les pains à la cannelle congelés directement sur une plaque de cuisson au centre du four et cuire pendant 14-16 minutes.	Preparazione: Scaldare il forno a 170 - 190 °C. Posizionare le Brioche alla cannella ancora congelate direttamente nella teglia e disporla al centro del forno per 14-16 minuti.	Preparación: Precalentar el horno a 170 - 190 °C. Colocar los bolitos de canela congelados directamente en la bandeja de hornear en el centro del horno durante 14-16 minutos.
Best before	Best Before:	Best Before:	Mindestens haltbar bis:	À consommer de préférence avant le:	Da consumarsi preferibilmente entro il:	Consumir antes de:
Production date	Production date	Production date:	Produktionsdatum:	Date de production :	Data di produzione	Fecha de producción
Produced in XXX for						
Claims (please check each claim and provide information whether the claim is allowed to be used and provide corresponding requirements for each if available)		-		-		
Nutrition information	Nutritional values per 100 g	Nutritional values per 100 g	Nährwerte pro 100 g	Valeurs nutritionnelles pour 100g	Valori nutrizionali per 100 g	Valores nutricionales por 100 g
	kJ / kcal	Energy: 1335kJ / 319kcal	Energie	Énergie	Energia	Valor energético
	g Fat	Fat: 8g	Fett	Matières grasses	Grassi	Grasas y aceites
	g of which saturates	of which saturates: 1.8g	davon gesättigte Fettsäuren	dont acides gras saturés	di cui acidi grassi saturi	de las cuales saturados
	g Carbohydrates	Carbohydrate: 54g	Kohlenhydrate	Glucides	Carboidrati	Hidratos de carbono
	g of which sugars	of which sugars: 16.6g	davon Zucker	dont sucres	di cui zuccheri	de los cuales azúcares
	g Protein	Protein: 6g	Eiweiß	Protéines	Proteine	Proteínas
	g Salt	Salt: 0.43g	Salz	Sel	Sale	Sal
		Comments EN	Comments DE	Comments FR	Comments IT	
	We changed the cooking instruction for all. The buns should be baked directly from frozen. So no instruction for thawed buns.	Product formulation is in compliance with EU requirements.	As there is no direct equivalent to „vanilla custard“ in German, I translated as „vanilla crème“ (DE: Vanille-Creme).		You may consider to call the product with a more descriptive name.	

# Stage 4: Final check

ASPECT	CHECKED <sup>1</sup>
Legibility and minimum font size	✓
Field of vision	✓
Brand/fancy name	✓
Product name	✓
Ingredients listing	✓
Quantitative Ingredient Declaration (QUID)	✓
Allergens	✓ or N/A
Date mark	✓
Storage instructions	✓ or N/A
Special Storage Conditions	✓ or N/A
Instructions for use	✓ or N/A
Business name/address	✓

Place of origin	✓ or N/A
Alcohol declaration	✓ or N/A
Lot mark	✓ or N/A
BOP nutrition labelling including calculation of energy	✓ or N/A
FOP nutrition labelling	✓ or N/A
Marketing claims	✓ or N/A
Nutrition claims	✓ or N/A
Health claims	✓ or N/A
Pictorial illustrations	✓ or N/A
Quantity declaration	✓
'e'mark	✓ or N/A
Additional mandatory statements – specify Examples: caffeine, quinine, sweeteners, liquorice, modified atmosphere, food supplements, product safety (e.g. food containing toys), product specific labelling, symbols, identification mark/health mark, novel foods, genetic modification, organic foods, allergens, halal, kosher, etc	✓ or N/A



# Summary

- 1 The importance of food compliance
- 2 One approach
- 3 Your approach

# Thanks for listening!

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# Questions

# leatherhead food research

innovate | access new markets | realise global opportunities