

EN

EN

EN



COMMISSION OF THE EUROPEAN COMMUNITIES

Brussels, 11.1.2008

Draft

COMMISSION DIRECTIVE ../.../EC

of [...]

amending Directive 90/496/EEC of the Council as regards recommended daily allowances, energy conversion factors and definitions

(Text with EEA relevance)

WORKING DOCUMENT

This is a working draft and does not necessarily reflect the final views
of the Commission

Draft

COMMISSION DIRECTIVE/EC

of [...]

amending Directive 90/496/EEC of the Council as regards recommended daily allowances, energy conversion factors and definitions

(Text with EEA relevance)

THE COMMISSION OF THE EUROPEAN COMMUNITIES,

Having regard to the Treaty establishing the European Community,

Having regard to Council Directive 90/496/EEC of 24 September 1990 on nutrition labelling for foodstuffs¹, as last amended by Directive 2003/120/EC², and in particular Articles 1(4)(a)(ii), 1(4)(j) and 5(2) thereof,

After consulting the European Food Safety Authority,

Whereas:

- (1) Directive 90/496/EEC specifies that fibre should be defined.
- (2) Conditions for nutrition claims such as 'source of fibre' or 'high fibre' are laid down in the Annex to Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods³.
- (3) For reasons of clarity and coherence with other Community legislation that refers to that notion, it is necessary to provide a definition of 'fibre'.
- (4) The definition of fibre should take into account relevant work by the Codex Alimentarius and the proposed definition for fibre, expressed on the 6 July 2007, by the European Food Safety Authority in its statement of the Scientific Panel on Dietetic Products, Nutrition and Allergies.
- (5) Fibre has been traditionally consumed as plant material and has beneficial physiological effects such as; decrease intestinal transit time, increase stool bulk, is fermentable by colonic microflora, reduce blood total cholesterol, reduce blood LDL cholesterol levels, reduce post-prandial blood glucose, or reduce blood insulin levels. Recent scientific evidence has shown that similar beneficial physiological effects may be obtained from other carbohydrate polymers that are not digestible and not naturally

¹ OJ L 276, 6.10.1990, p. 40.

² OJ L 333, 20.12.2003, p. 51.

³ OJ L 12, 18.1.2007, p. 3. Regulation as last amended by ...

occurring in the food as consumed. Therefore it is appropriate that the definition of fibre should include carbohydrate polymers with beneficial physiological effects.

- (6) The carbohydrate polymers of plant origin that meet the definition of fibre may be associated in the plant with lignin or other non-carbohydrate components such as phenolic compounds, waxes, saponins, phytates, cutin, phytates, phytosterols. These substances when closely associated with carbohydrate polymers of plant origin should be considered as fibre.
- (7) In order to take account of new scientific and technological developments, there is a need to amend the list of energy conversion factors.
- (8) The FAO report of a technical workshop Food energy – methods of analysis and conversion factors in indicates that 70 percent of the fibre in traditional foods is assumed to be fermentable. Therefore, it is appropriate that the average energy value for fibre should be 8 kJ/g (2 kcal/g).
- (9) Erythritol can be used in a wide variety of foods and is used, among others, as a replacement for nutrients such as sugar where lower energy content is desired.
- (10) Erythritol is a polyol, and according to the current rules as provided for in Article 5(1) of Directive 90/496/EEC, its energy would be calculated using the conversion factor for polyols, namely 10 kJ/g (2,4 kcal/g). Using this energy conversion factor would not fully inform the consumer about the reduced energy content of a product achieved by the use of erythritol in its manufacture. The Scientific Committee on Food in its opinion on erythritol, expressed on 5 March 2003, noted that the energy provided by erythritol to be less than 0,9 kJ/g (0,2 kcal/g). Therefore it is necessary to adopt the appropriate energy conversion factor for erythritol.
- (11) The Annex to Directive 90/496/EEC lists the vitamins and minerals which may be declared as part of the nutrition labelling, specifies their recommended daily allowances (RDAs) and defines a rule of what constitutes a significant amount.
- (12) The rule on significant amount as defined in the Annex to Directive 90/496/EEC constitutes a reference in other Community legislation, in particular in article 8(3) of Directive 2002/46/EC of the European Parliament and of the Council of 10 June 2002 on the approximation of the laws of the Member States relating to food supplements⁴ in the Annex to Regulation (EC) No 1924/2006 and in article 6(6) of Regulation (EC) No 1925/2006 of the European Parliament and the Council of 20 December 2006 on the addition of vitamins and minerals and of certain other substances to foods⁵.
- (13) The RDAs listed in the Annex to Directive 90/496/EEC are based on the recommendation of the FAO/WHO expert consultation meeting in Helsinki in 1988.
- (14) In order to ensure coherence with other Community legislation, the current list of vitamins and minerals and their RDAs should be updated in the light of scientific developments since 1988.

⁴ OJ L 183, 12.7.2002, p. 51. Directive as amended by Commission Directive 2006/37/EC (OJ L 94, 1.4.2006, p. 32)

⁵ OJ L 404, 30.12.2006, p. 26. Regulation as last amended by ...

- (15) The Scientific Committee on Food in its opinion on the revision of reference values for nutrition labelling, expressed on 5 March 2003, proposed reference labelling values for adults. This opinion covers the vitamins and minerals listed in Annex I to Directive 2002/46/EC and in Annex I to Regulation (EC) No 1925/2006.
- (16) The annex of Directive 90/496/EEC should therefore be amended accordingly.
- (17) The measures provided for in this Directive are in accordance with the opinion of the Standing Committee on the Food Chain and Animal Health,

HAS ADOPTED THIS DIRECTIVE:

Article 1

Directive 90/496/EEC is amended as follows:

1. In Article 1(4) the point (j) is replaced by the following:

'(j) 'fibre' means carbohydrate polymers with three or more monomeric units, which are neither digested nor absorbed in the small intestine. Dietary fibre consists of one or more of:

- edible carbohydrate polymers naturally occurring in the food as consumed;
- carbohydrate polymers, which have been obtained from food raw material by physical, enzymatic or chemical means;
- synthetic carbohydrate polymers.

For the material considered as fibre a beneficial physiological effect should be demonstrated by generally accepted scientific evidence except in the case of non-digestible edible carbohydrate polymers naturally occurring in foods as consumed;'

2. The following is added at the end of Article 5(1):

- '– fibre 2 kcal/g – 8 kJ/g
- erythritol 0 kcal/g – 0 kJ/g'.

3. The Annex to Directive 90/496/EEC is replaced by the text in the Annex to this Directive.

Article 2

1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [12 months after the last day of the month of publication] at the latest. They shall forthwith communicate to the Commission the text of the main provisions of national law which they adopt in the field covered by this Directive.

When Member States adopt those provisions, they shall contain a reference to this Directive or be accompanied by such a reference on the occasion of their official publication. Member States shall determine how such reference is to be made.

2. Member States shall ensure that products which do not comply with the provisions of this Directive shall be prohibited as from [*xx months after the last day of the month of publication*].

Article 3

This Directive shall enter into force on the 20th day following that of its publication in the *Official Journal of the European Union*.

Article 4

This Directive is addressed to the Member States.

Done at Brussels, [...]

For the Commission
Markos KYPRIANOU
Member of the Commission

ANNEX

1. Annex to Directive 90/496/EEC is replaced by the following:

'ANNEX

Vitamins and minerals which may be declared and their recommended daily allowances (RDAs)

Vitamin A (µg)	800	Potassium (mg)	2000
Vitamin D (µg)	5	Chloride (mg)	800
Vitamin E (mg)	12	Calcium (mg)	800
Vitamin K (µg)	75	Phosphorus (mg)	700
Vitamin C (mg)	80	Magnesium (mg)	375
Thiamin (mg)	1,1	Iron (mg)	14
Riboflavin (mg)	1,4	Zinc (mg)	10
Niacin (mg)	16	Copper (mg)	1
Vitamin B6 (mg)	1,4	Manganese (mg)	2
Folate (µg)	200	Fluoride (mg)	3.5
Vitamin B12 (µg)	2,5	Selenium (µg)	55
Biotin (mg)	50	Chromium (µg)	40
Pantothenic acid (mg)	6	Molybdenum (µg)	50
		Iodine (µg)	150

As a rule, 15% of the recommended allowance specified in this Annex supplied by 100 g or 100 ml or per package if the package contains only a single portion should be taken into consideration in deciding what constitutes a significant amount.

Summary: Intervention & Options

Department /Agency: Food Standards Agency	Title: Impact Assessment of EU Proposal Amending Directive on Nutrition Labelling for foodstuffs (90/496/EEC)	
Stage: Consultation	Version: 1.0	Date: 3 March 2008
Related Publications: Council Directive on Nutrition Labelling for foodstuffs (90/496/EEC)		

Available to view or download at:

<http://www.food.gov.uk>

Contact for enquiries: Kate Halliwell

Telephone: 0207 276 8145

What is the problem under consideration? Why is government intervention necessary?

The Nutrition Labelling Directive (90/496/EEC) was adopted in 1990. Several recently adopted pieces of legislation require specific technical nutrition information in order to allow particular labelling and refer back to this Directive for the information, however the information is either absent from the Directive or out-of-date due to scientific and technological advances.

There is a need to update some of the technical information to reflect current technologies and to allow coherence between legislation.

What are the policy objectives and the intended effects?

To create coherence between different pieces of legislation to ensure industry and enforcement authorities have a clear technical framework to work within and the consumer is provided with consistent and accurate information based on current science.

What policy options have been considered? Please justify any preferred option.

Option 1: Do nothing: i.e. fail to implement the proposed amendments to the Directive.

Option 2: Implement the proposed revisions of the Directive as required by European law without amendments.

Option 3: Implement the revisions to the Directive required by European law following negotiation to take account of issues raised by stakeholders, including inclusion of appropriate transition arrangements. This is the preferred option as it provides benefits to industry and consumers whilst incurring minimal costs.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects? Once the Amending Directive is adopted, a consequential amendment will be made to the EU Food Information Regulation proposal. If adopted by 2010, this Regulation will be reviewed by 2015.

Ministerial/CEO Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister/Chief Executive*:



Date: 6 April 2008

* for Impact Assessments undertaken by non-ministerial departments/agencies and NOT being considered by Parliament

Summary: Analysis & Evidence

Policy Option: 3

Description: Implement Amending Directive with negotiated implementation timescale

COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups' The maximum number of companies that may need to read the new legislation is 14,500. £7.31 x 14,500 yields a one-off administrative cost of £106,000.
	One-off (Transition)	Yrs	
	£ 22,120	5	There are 469 LAs who will need to read the new legislation: £9.77 x 469 yields a one-off administrative cost of £4,600.
	Average Annual Cost (excluding one-off)		
£ Zero		Total Cost (PV)	£ 103,370
Other key non-monetised costs by 'main affected groups' Analysis of erythritol by a small number of companies.			

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups'
	One-off	Yrs	
	£		
	Average Annual Benefit (excluding one-off)		
£ N/K		Total Benefit (PV)	£ N/K
Other key non-monetised benefits by 'main affected groups' Benefits to consumers, industry, enforcement authorities and government, as more accurate information concerning the nutritional composition of food stuffs facilitates choice, and coherence in legislation improves clarity to industry and enforcers as to how to correctly label products.			

Key Assumptions/Sensitivities/Risks

Price Base Year 2008	Time Period Years 5	Net Benefit Range (NPV) £ N/K	NET BENEFIT (NPV Best estimate) £ N/K
-------------------------	------------------------	-----------------------------------------	-------------------------------------------------

What is the geographic coverage of the policy/option?	UK			
On what date will the policy be implemented?	2008			
Which organisation(s) will enforce the policy?	Local Authorities			
What is the total annual cost of enforcement for these organisations?	£ 920			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	No			
What is the value of the proposed offsetting measure per year?	£ N/A			
What is the value of changes in greenhouse gas emissions?	£ Zero			
Will the proposal have a significant impact on competition?	Yes/No			
Annual cost (£-£) per organisation (excluding one-off)	Micro Zero	Small Zero	Medium Zero	Large Zero
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase - Decrease)
Increase of	£ Zero	Decrease of £ Zero
Net Impact		£ Zero

Key: Annual costs and benefits: Constant Prices (Net) Present Value

PURPOSE AND INTENDED EFFECT OF MEASURE

1. The proposed amending Directive (the Amending Directive) is intended to update technical aspects of the Nutrition Labelling of Foodstuffs Directive (NLD) (90/496/EEC), to recognise scientific and technological developments since 1990 and to ensure coherence with other Community legislation, particularly the Nutrition and Health Claims made on Foods Regulation (NHCR) (1924/2006), the Addition of Vitamins and Minerals and of Certain Other Substances to Foods Regulation (AVMR) (1925/2005), Food Supplements Directive (FSD) (2002/46/EC) and Directive 2006/37/EC amending the FSD.

BACKGROUND

2. Food labelling is under European Union competence. The rules which govern nutrition labelling are laid out in the NLD. The NLD defines the requirements for nutrition labelling on pre-packed foods, including technical requirements and was implemented into law for England, Scotland and Wales by the Food Labelling Regulations 1996 (as amended), and by similar but separate legislation for Northern Ireland.
3. Food labelling gives consumers the ability to make informed choices, however there is an inconsistency between the NLD and subsequent legislation (listed above) and in addition there have been scientific and technological advances since the adoption of the NLD. This could result in labelling which is misleading to consumers. It also results in a lack of clarity about legal requirements for industry and enforcement authorities. There is a need to update specific technical issues within the NLD, set out in more detail below, to address these points.
4. The NLD does not define fibre. However the NHCR lays down conditions for nutrition claims to be made about fibre (source of fibre, high fibre). There is a need to define fibre to ensure there is a consistent basis within the UK and across Europe for fibre labelling and claims. There is currently no agreed consensus on the definition of fibre by the international community. The current Codex definition of fibre (adopted in 1985) has been under discussion at Codex Alimentarius Committee on Nutrition and Foods for Special Dietary Uses (CCNFDSU) since 1992 within the framework of the 'Guidelines for use on Nutrition Claims'. The European Food Safety Authority (EFSA) published a statement in summer 2007 supporting the Codex proposed definition. The WHO/FAO proposed a different definition for fibre in November 2006 and published background papers to this proposal in November 2007. EFSA did not alter its opinion following publication of the FAO/WHO papers. The international definition of fibre is due to be discussed at a Codex meeting in November 2008.
5. The NLD defines energy conversion factors, which are required to calculate the energy present in a foodstuff. Scientific and technological advances relating to food ingredients mean that new energy conversion factors are required to ensure the consumer is not misled as to the overall energy content of some foodstuffs.

6. The Annex to the NLD lists the vitamins and minerals which may be declared as part of nutrition labelling and specifies their recommended daily allowances (RDAs). The NHCR, AVMR and FSD all refer to the NLD Annex, and the RDAs listed there, for the purposes of labelling. However these Regulations and Directives contain a fuller list of vitamins and minerals than the one currently given in the older NLD. In order to ensure coherence with these Regulations and Directives there is a need to update the current list of vitamins and minerals and associated RDAs.

7. In May 2006 the Commission published a discussion paper on technical amendments to the NLD, which included discussion on a definition for fibre, energy conversion factors and recommended daily amounts. The UK enclosed this paper with an Interested Parties letter to stakeholders in May 2006 and requested their views. This informed the Agency's response to the Commission in July 2006.

8. The Commission has identified its intention to take forward the proposed technical revisions via comitology procedures. Once the Amending Directive is adopted a consequential amendment will be made to the proposal for the Food Information Regulation.

SCOPE OF EC'S AMENDING DIRECTIVE

9. The Amending Directive seeks to update technical aspects of the NLD. It proposes:

- **Definition of fibre**

The Amending Directive bases the definition of fibre on the draft CODEX definition and the EFSA proposed definition for fibre (2007). Background to this definition is provided in the recitals (4), (5) and (6) of the Amending Directive. The definition given is as follows:

'fibre' means carbohydrate polymers with three or more monomeric units, which are neither digested nor absorbed in the small intestine. Dietary fibre consists of one or more of:

- edible carbohydrate polymers naturally occurring in the food as consumed;
- carbohydrate polymers, which have been obtained from food raw material by physical, enzymatic or chemical means;
- synthetic carbohydrate polymers.

For the material considered as fibre a beneficial physiological effect should be demonstrated by generally accepted scientific evidence except in the case of non-digestible edible carbohydrate polymers naturally occurring in foods as consumed;'

Is the definition of fibre appropriate? If not, how should fibre be defined? Please provide evidence to support your view on the most appropriate definition. Do you consider there would be any cost associated with the adoption of the fibre definition you support?

- **Energy conversion factors**

The Amending Directive sets out two new energy conversion factors based on opinions of the Food and Agricultural Organisation of the United Nations (FAO) (2003) and the Scientific Committee on Food of the EU (SCF) (2003).

fibre	2 kcal/g – 8 kJ/g
erythritol	0 kcal/g – 0 kJ/g'

Do stakeholders agree with the defined energy conversion factors? If not, what values do they think are appropriate? Do stakeholders considered there should be any other energy conversion factors defined? Please provide evidence supporting your views.

Given fibre analysis already occurs, we are assuming there is no cost associated with defining a single fibre ECF. Do you agree with this statement? If not, please can you explain and estimate any additional cost? Do you consider there will be additional costs associated with the ECF for erythritol? If so, please can you specify costs and provide evidence for these.

- **Recommended Daily Allowances (RDAs) for Vitamins and Minerals**

The Amending Directive proposes the Annex is amended based on the Scientific Committee on Food Opinion (2003) and taking in to account subsequent published scientific opinion from independent scientific committees, as follows:

Vitamins and minerals which may be declared and their RDAs

Vitamin A (µg)	800	Potassium (mg)	2000
Vitamin D (µg)	5	Chloride (mg)	800
Vitamin E (mg)	12	Calcium (mg)	800
Vitamin K (µg)	75	Phosphorus (mg)	700
Vitamin C (mg)	80	Magnesium (mg)	375
Thiamin (mg)	1,1	Iron (mg)	14
Riboflavin (mg)	1,4	Zinc (mg)	10
Niacin (mg)	16	Copper (mg)	1
Vitamin B6 (mg)	1,4	Manganese (mg)	2
Folate (µg)	200	Fluoride (mg)	3.5
Vitamin B12 (µg)	2,5	Selenium (µg)	55
Biotin (µg)	50	Chromium (µg)	40
Pantothenic acid (mg)	6	Molybdenum (µg)	50
		Iodine (µg)	150

Do stakeholders agree with the RDA values? Are there any additional vitamins or minerals for which RDAs need to be defined? Please provide evidence to support your view.

RATIONALE FOR GOVERNMENT INTERVENTION

10. There have been scientific and technological advances since the NLD was adopted, which if not recognised may result in misleading information being provided to the consumer. Additionally there is a need for coherence between the NLD and more recently adopted Regulations and Directives in order for industry to properly label products according to the means permitted. If the NLD is not amended, industry will be left open to enforcement action because of the lack of legal certainty due to absent values for conditions that apply in provisions of the NHCR, AVRMS and FSD. Rather than having transparent conditions to apply they must rely on their own calculations.

11. It is therefore essential that the NLD is amended to provide consumers with more accurate nutritional information and industry and enforcement with a clear framework to work within. By adopting an Amending Directive to the NLD this will be achieved in a much shorter timescale than if the work taken forward in the context of the current EU Food Information Regulation proposal.

CONSULTATION

12. Consumer and health professional groups, manufacturers and industry bodies, enforcement bodies, individuals and Other Government Departments are being consulted on the Amending Directive and this IA is part of the formal consultation process.

OPTIONS

13. Option 1: Do nothing: i.e. fail to implement the Amending Directive

14. Option 2: Implement the provisions of the Amending Directive as required by European law without amendments, accepting the timescale for implementation when decided.

15. Option 3: Implement the provisions of the Amending Directive with negotiation on timescale for implementation to minimise re-labelling costs.

16. Option 1: Failure to implement would be a risk to Government in that it would result in a serious breach of the UK's obligations under the EC treaty and is likely to attract infraction proceedings by the Commission against the UK under Article 226 of the EC treaty and potential fines. Other Member States could also initiate action under Article 227. Ultimately, the UK would be forced to implement.

17. Failure to implement would also bring disadvantages to consumers, industry, enforcement authorities and Government. Failure to implement would mean consumers would not have access to accurate information about the nutritional content of some foods in the market; industry would be unable to comply with all the legislation as it is not coherent; and enforcement officers would have to enforce legislation which is contradictory.

18. Option 2: The UK government could accept the Amending Directive including timescales for implementation that have yet to be determined. This could result in transitional arrangements which are costly for industry to implement if the timescales do not allow for: sale of current products already labelled that no longer comply to be used up; re-labelling of current products to ensure compliance; and re-design of labels outside of the normal re-design cycle.

19. Option 3: There are no risks to option 3. Accepting the provisions ensures coherence across current legislation, which brings benefits to the consumer, industry and enforcement authorities. Negotiation on implementation timescales can result in the costs to business being minimised, and in likelihood tending to zero, by enabling current packaging stocks to be used and the new requirements incorporated during existing commercially scheduled label re-design.

COSTS AND BENEFITS

Business sectors affected

20. Businesses affected by the Amending Directive are those that produce supplements and any food business that chooses to provide voluntary nutrition labelling, make a nutrition or health claim on a product or voluntarily add vitamins or minerals to foodstuffs.

Are the sectors and groups affected by the Amending Directive reasonably represented in this Impact Assessment? If you partly agree or don't agree, please identify sectors that should also be considered and explain why.

Consumers affected

21. The legislation will benefit consumers who will have access to more accurate information concerning the nutritional composition of food stuffs which reflects current scientific knowledge.
22. The costs and benefits of options 1, 2 and 3, based on current evidence, are outlined below. The benefits of options 2 and 3 are the same, insofar as they represent the benefits of implementing the proposal and so only the potential costs alters.

Benefits

23. Option 1: failure to implement would not bring any benefits to consumers, industry, enforcement authorities or government.
24. Option 2: implementation brings benefits to consumers, industry, enforcement authorities and government. It enables consumer to access more accurate information concerning the nutritional composition of food stuffs to facilitate choice. It allows for coherence in legislation which gives clarity to industry as to how to label products and to enforcement officials as to how to enforce legislation.
25. Option 3: brings the same benefits as option 2 but with labelling costs tending to zero due to incorporation of changes within existing commercial cycles.

We welcome views from stakeholders on this benefits analysis and any omissions / further information that stakeholders can identify.

Costs

26. The British Retail Consortium estimates that the cost to re-label a Standard Stock Keeping Unit (SKU) in the UK costs on average £1000 (see the FSA RIA nutrition and health claims, 2007). This figure has been supported by other stakeholders including a major UK retailer. Further, it has been suggested to the Agency that a period of two years would be sufficient to encompass the bulk of manufacturers' and specialist retailers' commercial re-labelling cycles. However, certain craft products' labels may be changed less frequently and a figure of five years has previously been given.
27. There may be some costs associated with erythritol analysis for companies to correctly label this, but in the case of fibre, the analysis method for the definition will be as is for UK

industry listing fibre currently in nutrition declarations so the only difference here is to calculate the energy conversion factor by multiplying by 2.

28. As such, the Agency is assuming that given appropriate transition periods, apart from a small potential cost for erythritol analysis and reading and understanding of the new legislation, there are no other direct incremental costs associated with implementation of the Amending Directive.
29. In terms of reading and understanding the new legislation, the Agency estimates a time of 30 minutes per business to be realistic. This equates to a cost per business of £7.31. This figure is taken from the 2007 ONS ASHE (Annual Survey of Hours and Earnings) figures for Managers in Distribution, Storage and Retailing of £11.24 per hour (median value), which, in-line with the Standard Cost Model, is then up-rated by 30% to account for overheads, to give a figure of £14.61 per hour. Divided by two for half an hour, gives £7.31.
30. There are estimated to be 18,000 food related manufacturing companies in the UK. Of these 80% are thought to be providing Group 2 nutritional labelling. Thus the maximum number of companies that may need to read the new legislation is 14,500. £7.31 x 14,500 yields a one-off administrative cost of £106,000.

We welcome views from industry regarding appropriate transition periods for their business to allow for sale through of current packaging, along with any evidence they have.

We also welcome views from stakeholders on whether the cost assumptions in this area are correct.

ENFORCEMENT AND SANCTIONS

31. Local Authority Trading Standards (LA) will be responsible for the enforcement of the proposed new provisions. This remains unchanged from existing enforcement arrangements. Apart from the reading and understanding of the new legislation, there are no additional incremental ongoing costs.
32. In terms of reading and understanding the new legislation, the Agency estimates a time of 30 minutes per LA to be realistic. This equates to a cost per LA of £9.77. This figure is taken from the 2007 ONS ASHE (Annual Survey of Hours and Earnings) figures for Public Service Professionals of £15.03 per hour (median value), which, in-line with the Standard Cost Model, is then up-rated by 30% to account for overheads, to give a figure of £19.54 per hour. Divided by two for half an hour, gives £9.77.
33. There are 469 LAs who will need to read the new legislation: £9.77 x 469 yields a one-off administrative cost of £4,600.

We welcome view from LACORS and other stakeholders as to the potential affects on enforcement activities.

REVIEW

34. The Amending Directive does not provide any specific review date. However once adopted the provisions of the Amending Directive create a consequential amendment to the EU

Food Information Regulation proposal and therefore will be subject to discussion in the European Council and Parliament under co-decision.

35. The Agency will conduct a full review of the effectiveness of the Food Information Regulation by 2015.

ADMINISTRATIVE BURDENS

36. Apart from the one-off reading and understanding of the new legislation there are no identified on-going administrative burdens salient to this impact assessment.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	<i>Results in Evidence Base?</i>	<i>Results annexed?</i>
Competition Assessment	No	Yes
Small Firms Impact Test	No	Yes
Legal Aid	No	No
Sustainable Development	No	Yes
Carbon Assessment	No	No
Other Environment	No	No
Health Impact Assessment	No	No
Race Equality	No	Yes
Disability Equality	No	Yes
Gender Equality	No	Yes
Human Rights	No	No
Rural Proofing	No	No

Current nutrition labelling requirements are laid down in European Union legislation (Council Directive 90/496/EEC). The provision of nutrition information on food labels is voluntary unless:

- a nutrition claim, for example 'low in fat', is made,
- a health claim, for example 'calcium helps build strong bones and teeth', is made, or
- vitamins or minerals have been voluntarily added to a food,

in which case it becomes mandatory.

Companies can use a short version (Group 1 nutrition labelling), which details energy, protein, carbohydrate and fat in a product, or a longer version (Group 2 nutrition labelling). Group 2 nutrition labelling gives details of the energy, protein, carbohydrate, sugars, fat, saturates, fibre and sodium in the foodstuff. The Directive defines each of these nutrients, except for fibre. Energy conversion factors for different elements of foodstuffs are defined which have to be used to calculate the energy value listed.

The Annex to the Directive lists vitamins and minerals and their RDAs. Only vitamins and minerals which are listed in this Annex and are present in a significant amount (15% RDA) can be included in the nutrition information. The Nutrition and Health Claims made on Foods Regulation (1924/2006) and the Addition of Vitamins and Minerals and of Certain Other Substances to Foods Regulation (1925/2005) contain a positive list of vitamins and minerals for use within the legislation which contain vitamins and minerals not listed in this annex. However, in order for a claim to be made about vitamins and minerals, or for them to be voluntarily included in foodstuffs they must provide nutrition information as laid out in the Nutrition Labelling Directive. Therefore there are legally permissible claims, and vitamins and minerals which can be added to foodstuffs, but which cannot legally provide the nutrition information required.

The Food Supplements Directive (2002/46/EC) and Directive 2006/37/EC amending the Food Supplements Directive require that food supplements are labelled so as to state, in numerical form, the amounts of vitamins and minerals present in each daily dose and stipulate that for vitamins and minerals listed in the Annex to the Nutrition Labelling Directive, the amounts present in each daily dose must additionally be expressed as a percentage of the recommended daily allowance.

Competition Assessment

The proposed legislation does not impose any significant costs to industry and applies to all manufacturers equally. By clarifying the labelling framework within which companies work there is scope for the legislation to help facilitate competition. It is not expected to impose significant negative impacts on competition.

Small Firms Impact Test

It is not thought that the proposed legislation will disproportionately impact small businesses as there are very few, if any, incremental costs involved in achieving compliance.

Sustainable development

The Agency's 2006 research, evaluating the impact on business of changes to nutritional labelling requirements in the UK, estimated that existing packaging stocks will tend to be mainly used up (69% of companies) within 12 months. Only 11% of companies require in excess of two years to use up their labels. By negotiating implementation times for the new legislation which takes these timescales into account, along with any further information obtained from this consultation, to allow companies to use up existing packaging, it is expected that there will not be any significant amounts of wasted product, packaging or labels. It is unlikely, therefore, that there will be any considerable implications on greenhouse gas emissions or negative impacts on natural resources.

Further, there will be consumer choice benefits to society, as a result of increased accuracy of nutrition labelling. There will also be a benefit to industry in terms of clarity of legislation. It is expected that these benefits will outweigh any potential costs to industry, which will be minimised by the proposed transition periods.

Race equality issues

The proposed legislation does not impose any restrictive compliance on any person from a particular race, gender or with disability.

Gender equality issues

The proposed legislation does not impose any restrictive compliance on any person from a particular race, gender or with disability.

Disability equality issues

The proposed legislation does not impose any restrictive compliance on any person from a particular race, gender or with disability.

List of Interested Parties

3663
3rd Aid Consulting
A Camacho UK Ltd
A G BARR
Abbot Laboratories Limited
ABR Foods
ACE LABELS PLC/Ellis Labels & Systems Ltd
Adams Pork Products
ADAMS WILSON & ASSOCIATES
ADAMSON BSMG
ADAS Wales
Advertising Associatiion
Advertising Standards Authority
ADVISORY BODY FOR SOCIAL SERVICES CATERING
Agricultural Industries Confederation
Alcontrol Laboratories
AL-KHOEI FOUNDATION
All Wales Dietetic Advisory Committee
ALLCHEM INTERNATIONAL
ALLERGY ALLIANCE
Alliance for Natural Health
Allied Bakeries Lid
ALLIED DOMECCQ RETAILING LTD
Allied Technical Centre
ALLSPORTS INTERNATIONAL LTD
alpha flight services
AMERICAN FOOD INTERNATIONAL
American Peanut Council
Amicus
Anaphylaxis Campaign
Animal Medicines Inspectorate
An-Nisa Society
APCO EUROPE
AQUINAS COLLEGE
Arkarius Limited
ARKOPHARMA (UK) LTD
ARLA FOODS PLC
Asda Stores Limited
Ashtown Food Research Centre
Ashurst
Ashwell Associates
ASSOC OF BRITISH PAEDIATRIC NURSES
Associated British Foods plc
Association of Bakers Ingredients Manufacturers
Association of British Abattior Owners
Association of Cereal Food Manufacturers Ltd
ASSOCIATION OF CHEESE PROCESSORS
Association of Convenience Stores
Association of Muslim Professionals
ASSOCIATION OF MUSLIM SCHOLARS

ASSOCIATION OF PASTRY CHEFS
Association of Port Health Authorities
Association of Public Analysts of Scotland
ASSOCIATION OF RADICAL MIDWIVES
ASSURED BRITISH MEAT
Assured British Meat
Assured Food Standards
Aston Manor Brewery
Authentixs
Baby Milk Action
BAKER & McKENZIE
Bakkavor (Birmingham) Ltd
Bakkavor Group
Bangladesh Caterers Association UK
BARBOUR INDEX PLC
BAREFIELDS LTD
Barentz BV
Barnet London Borough Council
Barry Atwood
Basic Skills Agency
BBSRC Institute of Food Research
Beadle House Clinic
Bearfields Limited
BEE FARMERS ASSOCIATION OF THE UK
BEE SERVICES
BELSO'S (UK) CEREALS LTD
Bernard Matthews Ltd
Berry Ottawayand Associates Limited
Beth-Din
BEVAN ASHFORD
BioCare
Bioforce (UK) Ltd
Biohealth Ltd
BIRD & BIRD
BIRMINGHAM CHILDRENS HOSPITAL
BIRMINGHAM CITY LABORATORIES
BIRMINGHAM LIBRARY SERVICES
Biscuit, Cake, Chocolate & Confectionery Association
Bonnia Petite Banqueting Ltd
Booker Ltd
Boots The Chemist
BOROUGH OF REIGATE & BANSTEAD
Bourne Salads
BOURNMOUTH UNIVERSITY
BOWYERS (WILTSHIRE) LTD
Bradford Council Of Mosques
Bradford House
Brake Co Ltd
BRAKES
Breakspear Hospital
Brent Council
Bretby Conference Centre

Brewster et Huguette White
Bristol City Council (855)
BRITANNIA HEALTH PRODUCTS LTD
British Airways - Health Services
BRITISH ASSOCIATION FOR ALLERGY, ENVIRONMENT & NUT
British Association of Flower Essence Producers
British Association of Nutritional Therapists
British Beekeeper's Association
British Caramel Manufacturers ASSOCIATION
British Cheese Board
British Coffee Association
British Complementary Medicine Association
BRITISH DENTAL ASSOC
British Dietetic Association
BRITISH EGG INDUSTRY COUNCIL
British Essential Oils Association
BRITISH FERMENTATION PRODUCTS
British Food Importers & Distributors Association
British Fruit Juice Association
British Fruit Juice Importers' Association
British Goat Society
British Heart Foundation
British Heart Foundation Promotion Research Group
British Herbal Medicine Association
British Hospitality Association
British Institute for Allergy & Environmental Therapy
British Meat Processors Association
British Meat Processors Association
BRITISH MEDICAL ASSOCIATION
British Medical Association
British Nutrition Foundation
British Pig Association
BRITISH POTATO MARKETING ASSOCIATION
British Poultry Council
British Retail Consortium
British Soft Drinks Association Ltd
British Standards Institution
BRITISH SUGAR PLC
British Veterinary Association
BRITVIC SOFT DRINKS LTD
BROMLEY CENTRAL LIBRARY
Brooks-Carter Clinic
Bureau Veritas
Burson-Marsteller/BKSH
Business Eye
Business in Sport & Leisure
c/o Danisco-Cultor
c/o Institute of Optimum Nutrition
Cadbury Schweppes plc
Camacom Law (Solicitors) Ltd
CAMedica
Campaign for Real Ale Ltd

Campden & Chorleywood Food Research Association
Cantox Health Sciences International
CARDIFF SCIENTIFIC SERVICES
CARVER WILDE COMMUNICATIONS
Catalent Pharma Sololutions
CATERER & HOTELKEEPER
CATERING UPDATE
CCI
Central Lobby Consultants
Centre for Food & Health StudiesLtd
Centre for Public Health Excellence, National Institute for Health and clinical Excellence
CEREAL PARTNERS WORLDWIDE
Charbonnel et Walker
CHARLES BARKER PLC
Charles Rowe
Chartered Institute of Environmental Health
CHEMIST & DRUGGIST
CHICHESTER COLLEGE OF ARTS SCENCES & TECHNOLOGY
CHILD ACTION PREVENTION TRUST
Chilled Food Association Ltd
Chinese National Healthy Living Centre
Chinese Take Away Association
Chocolates for Chocoholics Ltd
Christchurch Borough Council (084)
Churches' Commission for Inter-Faith Relations
City of York Council
Clarke Willmott Solicitors
Clark's Original Pies
CLINIC OF NATURAL MEDICINE
CMI PLC
CMS CAMERON MCKENNA
COASTAL TRADING
COCA COLA TRADING COMPANY
Coca-Cola Company
Coeliac UK
COFFEE TRADE FEDERATION LTD
COMMUNITY FOODS LTD
Community Nutrition Group
Community Practitioners & Health Visitor's Association
Compass Group UK & Ireland
Confederation of Indian Organisations (UK)
Confederation Of Sunni Mosques
CONFOCO International LTD
CONFOCO UK LTD
Consensus Action on Salt and Health
CONSUMERS FOR HEALTH CHOICE
Conwy County Borough Council
Cookie Man Ltd.
CO-OPERATIVE GROUP
Coors Brewers Plc
Cornwall County Council

COSUCRA
COTT BEES LTD
Cottage Restaurant & Lodge
Council for Responsible Nutrition
COUNSEL LTD
Country Markets Ltd
County Hospital
COVENTRY HEALTH AUTHORITY
COVINGTON & BURLING
CP Kelco UK Ltd
CRAIGAVON AREA HOSPITAL GROUP NSS
Crop Protection Association
Cullinane Associates Ltd
CUMBRIA COUNTY COUNCIL
D & T Association
Dabur India Ltd
Dabur Research Foundation
Dailycer Ltd
DAIRY COUNCIL
Dairy Crest Ingredients Department - Dairy Crest Group
DAIRY CREST LTD
Dairy UK Ltd
Dale Farm (GB) Ltd
DANISCO INGREDIENTS UK LTD
DANISH BACON & MEAT COUNCIL LTD
DANISH BACON COMPANY PLC
DEFENCE CATERING GROUP
DEFRA
DEFRA - BASD
DEL MONTE FOODS (UK) LTD
Denbigshire County Council
Dentsu Brussels Group
Department for Business, Enterprise and Regulatory Reform
Department for Culture, Media and Sport
DEPARTMENT FOR INTERNATIONAL DEVELOPMENT
Department of Environment Food & Rural Affairs
Department of Health
Department of Local Government & Environment
Dept of Agriculture & Rural Development for Northe
Dept of Agriculture for NI
DEPT OF TRADE & INDUSTRY
Diabetes UK
Dietetic Dept
Dietician's Department
DKSH Great British LTD
DORSET COUNTY COUNCIL
Dr Stuart's Botanical Teas
DRUCES & ATTLEE
DSM
Durham City Council (095)
East Riding of Yorkshire Council (863)
EAST SUSSEX COUNTY COUNCIL

ECLIPSE SCIENTIFIC GROUP
EDLONG COMPANY LTD
ELKS BISCUITS
ENGLISH TOURIST BOARD
Environmental Data Services
Environmental Health and Trading Standards Service
ENVIRONMENTAL HEALTH DEPARTMENT
Environmental Medicine Foundation
Essential Trading Co-operative Ltd
ETHICS COMMITTEE'S
EUROFINS
Eurofins Laboratories Limited
Europe Analytica
European Federation of Health Product Manufacturers Association
EUROPEAN FOOD LAW ASSOCIATION UK
European Research into Consumer Affairs
EVERSHEDS
Exerter & District Consumer Group
F HOFFMAN - LA ROCHE LTD
F I Data Services
Faculty of Public Health of the Royal College of Physicians of the United Kingdom
Farmers' Union of Wales
Federation of Bakers
Federation of Danish Pig Producers & Slaughterhouses
Federation of Jain Organisations
Federation of Small Businesses
FEDERATION OF WHOLESALE DISTRIBUTORS
Federations of Synagogues
FIBRISOL SERVICE LTD
Findus Ltd
FISH TECHNOLOGY CONSULTANT
Fishmonger's Company
FLINTSHIRE COUNTY COUNCIL
Food & Health Research
FOOD ADDITIVES & INGREDIENTS ASSOCIATION
Food and Drink Federation
Food and Environmental Division LGC LTD
FOOD BRAND GROUP (THE)
Food Brands Group
Food Commission UK Ltd
Food Consultancy
FOOD ENGINEERING INTERNATIONAL MAGAZINE
Food Labelling Database
Food Law Group
Food Standards Australia New Zealand
Foodaware: the Consumers' Food Group
FOODS STANDARD AGENCY (NORTHERN ISLAND)
For Children
Foresight
Forum of Private Business
FORUM PRODUCTS LTD
Fox's Biscuits

FREELANCE DIETITIAN & NUTRITIONIST
FRESENIUS KABI LTD
FRESH PACKS FOODS LTD
Fresh Produce Consortium
Freshpack Ltd
Fridays Ltd
Friends of the Earth (HQ)
FSA Advisory Committee for Wales
FSANI
Fuel PR (Clients Include Danone)
G C Hahn & Co Ltd
G R Lane Health Products Ltd
General Consumer Council for Northern Ireland
General Dietary Ltd
Genuine Empowerment of Mothers in Society
GIN & VODKA ASSOCIATION
GIRACT
GIRAG SA
Glactosaemia
Glasgow Scientific Services
Glaxosmithkline
Glenryck Foods Ltd
Gloucester City Council (127)
Glutafin
GM Freeze Campaign
Good Food Distributors
GOODMAN DERRICK
GOVERNMENT OF WESTERN AUSTRALIA
Graig Farm Organics
Grampian Country Food Group Ltd
Grayshott Health Foods
GREENCITY WHOLEFOODS
Greenwoods Solicitors LLP
Guild of Bangladeshi Restaurateurs
GUILD OF PRACTITIONERS
Gwynedd CC
H J Heinz
H J Heinz Company Ltd
H M PRISON SERVICE
H T WEBB & CO LTD
Halal Food Authority
Halal Meat
HALEWOOD INTERNATIONAL LTD
Halo Foods Ltd
Halton Borough Council (889)
Hampshire County Council
HAMPSHIRE SCIENTIFIC SERVICES
Handmade Cake Company
Harrods Ltd
Harrow London Borough Council
Hartwell Food Research Ltd
HAZELWOOD PRESERVES LTD

HEALAN INGREDIENTS LTD
Health and Consumer Protection Directorate-General
Health Care Products
Health Food Manufacturers' Association
HEALTH PROMOTION DEPARTMENT
HEATHER PAINE ASSOCIATES
Heinz UK & Ireland
High Commission for the Republic of South Africa
Hildred & Cocker Ltd
Hill & Knowlton (UK) Ltd
HMPS
Holford & Associates
HOLLAND & BARRETT
HOME OFFICE HEALTH & SAFETY SERVICES
Honey Association
HONEYROSE PRODUCTS LTD
Horticulture Research International
Hospital Caterers Association
HOULSTON MANOR WATER
Howard Foundation Research Group
HUSH (Haemolytic Uraemic Syndrome Help)
HYGIENE & NUTRITION IN FOOD SERVICE
Ice Fresh Foods LTD
Iceland Foods Limited
Ilchester Cheese Co Ltd
ILS LTD
Imams & Mosques Council (UK)
Independent Nutrition Logic
Infant and Dietetic Foods Association
Innocent Drinks
Innocent Ltd
Institute of Food Science & Technology
Institute for Complimentary Medicine
INSTITUTE FOR OPTIMUM NUTRITION
INSTITUTE OF CHEMICAL ENGINEERS
Institute of Education
Institute of Food Science & Technology (IFST)
Institute of Hospitality
Institute of Practitioners in Advertising
Institute Of Refridgeration
Institute of Rural Health
Inter Faith Network for the UK
INTERNATIONAL FEDERATION OF ESSENTIAL OILS & AROMA TRADES
International Fish Meal & Oil Manufacturers Association
INTERNATIONAL FLIGHT CATERING
International Marketing
International Meat Trade Association
INTERNATIONAL PECTIN PRODUCERS ASSOCIATION
INTERNATIONAL SOFT DRINK COUNCIL
Interserve (Facilities Management) Limited
Intertab
ION Trading

Irish Yogurts Ltd
ISBA
ISBOURNE ENVIRONMENTAL LTD
ISLAMIC CENTRE OF GLASGOW
ISLAMIC CULTURAL CENTRE
ISLAMIC FOOD & NUTRITION COUNCIL
ISLAMIC FORUM OF EUROPE
Islamic Shariah Council
ISP Alginates
J RALPH BLANCHFIELD CONSULTANCY
J Sainsbury plc
JACOBS BAKERY LIMITED
Jain Network
JAMES GILBERTSON & CO
Jean Garon Public Relations
JETRO LONDON
John Rundall Associates
John Taylor and Son
John West Foods Ltd
Johnston Consulting
Joint Council for Anglo Caribbean churches
K J Lovering & Co Ltd
KELLER & HECKMAN LLP
KELLOGG COMPANY (GB) LTD
Kellogg Europe Trading Limited
Kent Trading Standards
KERRY FOODS UK
KETTLE FOODS
Kidney Research UK
Kikkoman Trading Europe GmbH
KINNERTON CONFECTIONARY CO LTD
KITCHEN RANGE FOODS LTD
KNIGHT INTERNATIONAL
Kraeber (UK) Ltd
Kraft Foods UK Ltd
L B CROYDON FOOD TEAM
L HEPNER & ASSOCIATES LTD
La Leche League (Great Britain)
Laboratory of the Government Chemist (LGC)
LAMBETH TRADING STANDARDS
Lancashire Council Of Mosques
Lancashire County Analysts Dept
LANCASHIRE COUNTY COUNCIL
LAW COMMISSION
LAW LABORATORIES LTD
LAWCODE
Lawdata Ltd
LAWRENCE GRAHAM
Leatherhead Food International
Lee Kee Kum (Hong Kong) Foods Ltd
Leeds City Council (413)
LEEDS METROPOLITAN UNIVERSITY

LEICESTER REFERENCE & INFORMATION LIBRARY
Leicester Reference and Information Library
Leicestershire County Analysts' Lab
Lewis Silkin Solicitors
LGC (TEDDINGTON) LTD
Lidl UK GmbH
LINX PRINTING TECHNOLOGIES PLC
Local Authorities Co-ordinators of Regulatory Services
LONDON BOROUGH OF BARKING & DAGENHAM
LONDON BOROUGH OF BRENT (ENVIRONMENTAL HEALTH)
London Borough of Ealing Council
LONDON BOROUGH OF ENFIELD
London Borough of Havering
London Borough of Lambeth
LONDON BOROUGH OF SOUTHWARK
London Food Centre
London Retail Meat Traders Association
LONZA
Lovell White Durrant Solicitors
Lovells
Lyn Anderson
LYONS TETLEY LTD
LYSI HS
MACFARLANES
Maltsters Association of Great Britain
MANCHESTER METROPOLITAN UNIVERSITY
Manchester Rusk Co Ltd
Mardon Plc
Margaret Anderson
Margarine and Spreads Association
Markazi Jamiat Ahle Hadith
MARKETING LAW ADVISORY SERVICE
Marks & Spencer Plc
MATTHEW CLARK LTD
MCCAIN FOODS
McCORMACK FOODS
McDonald's Restaurants Ltd
MCKENNA & CO
Meat & Livestock Commission
Med & Healthcare Prod Reg Affairs (MHRA)
Medicines & Healthcare Products Regulatory Agency
Mencap
MERIDIAN FOODS - technical department
Meridian Foods Ltd
MERRYDOWN PLC
MERRYVALE
MERTHYR TYDFIL BOROUGH COUNCIL
Metal Packaging Manufacturers Association
Micron2
MIDWIVES INFORMATION & RESOURCE SERVICE
MILTON KEYNES COUNCIL
Minister of State for Public Health

MJSR Associates
Monmouthshire County Council
Morelands Ltd/MH Foods Ltd
MOY PARK LTD
MP Media Services
MR JAMES LEGGE
MR R MCKINLEY
MRC Human Nutrition Research
MRC Human Nutrition Unit
Mrs G Ward
Muller Group UK
MUSHROOM GROWERS ASSOCIATION
Muslim College
Muslim Doctors & Dentists Association
NAT SOCIETY FOR PHENYLKENORIA (UK
National Association
National Association of British & Irish Millers
National Association of Cider & Perry Makers
National Association of Health Stores
National Association of Master Bakers
National Beef Association
NATIONAL CHILDBIRTH TRUST
National Consumer Council
National Consumer Federation
National Council of Hindu Temples UK
National Council Of Women
National Council of Women of Great Britain
NATIONAL EDIBLE OIL DISTRIBUTORS ASSOCIATION
National Farmers Union (NFU)
NATIONAL FEDERATION OF CONSUMER GROUPS
National Federation of Fisherman's Organisations
NATIONAL FEDERATION OF FISHERMEN'S ORGANISATIONS
National Federation of Meat & Food Traders
National Federation of Womens Institutes
National Heart Forum
National Heart Foundation of Australia
National Institute For Health & Clinical Excellence
NATIONAL INSTITUTE OF MEDICAL HERBALISTS LTD
National Market Traders' Federation
NATIONAL OFFICE OF ANIMAL HEALTH (NOAH)
National Pharmaceutical Association
National Pig Association
National Starch & Chemical Ltd
Natural Health Practice
Natural Products News
Nature's Own
NATURE'S OWN LTD
NCGFCO (Daniels)
NCH ACTION FOR CHILDREN
NESTLE Rowntree HQ
Nestle UK
NEVILLE CRADDOCK ASSOCIATES

New Covent Garden Food Co Ltd
New Zealand Food Safety Authority
NEWCASTLE UPON TYNE CITY LIBRARY
NEWRY & MOURNE DISTRICT COUNCIL
NEWSPAPER SOCIETY
NINEWELLS HOSPITAL
NORTH HERTFORDSHIRE NHS TRUST
NORTH SOMERSET COUNCIL TRDG STDS
North Yorkshire East Federation of Women's Institute
NORTHAMPTONSHIRE COUNTY COUNCIL
Northern Foods
NORTON ROSE
NORWEGIAN FOOD CONTROL AUTHORITY
NOTTINGHAMSHIRE COUNTY COUNCIL
NOVARTIS CONSUMER HEALTH
Novartis Medical Nutrition
Nutragen
Nutri (Imports & Exports) Ltd
Nutricia Ltd
Nutrilaw
Nutritech Consultancy
Nutrition and Allergy Clinic
Nutrition Associates
Nutrition Consultants Association
ODDBINS
ODYSEY LTD
OMYA Croxton + Garry LTD
ORAFIT
Orangina Group
Orchard House Foods
Organic Food Federation
ORGANIX BRANDS PLC
Oxfam Fair Trading Company
OXFORD UNIVERSITY DEPARTMENT OF PUBLIC HEALTH & PRIMARY CARE
OXFORDSHIRE COUNTY COUNCIL
PAI Ltd
PepsiCo International
PERCHARD'S
Perrigo UK
PERSHORE GROUP OF COLLEGES
Pesticide Action Network UK
PETTIFOR MORROW & ASSOCIATES LTD
PIZZA HUT (UK)
Plymouth and District Soroptimist International
Plymouth Consumer Group
POOLE TRADING STANDARD DEPT
Potato Processors Association
POTTERS HERBAL SUPPLIES LTD
POWER HEALTH PRODUCTS LTD
Premier Grocery Products Ltd
PREMIER INTERNATIONAL FOODS
Prime Minister's Office

Princes Foundation for Integrated Health
Principal Food Matters
PROPRIETARY ASSOCIATION OF GREAT BRITAIN
Proprietary Association Of Great Britain
PROTEIN TECHNOLOGY INTERNATIONAL
Provision Trade Federation
PROVISION TRADE FEDERATION
Pullins Bakers
Quality Meat Scotland
QUEEN ELIZABETH HOSPITAL
Quest Vitamins Ltd
QVC
R Twining and Co Ltd
RCC REGISTRATION AND
READING SCIENTIFIC SERVICES LTD
REAPERS
Register of Nutritional Therapists
RHM GROCERY
RHM Group
RHM Technology Ltd
Rio Trading Company (Health) Ltd
ROCWELL NATURAL MINERAL WATER
RON DEWDNEY LTD
Room 4306
ROTHERHAM HEALTH AUTHORITY
Rotherham NHS Foundation Trust
Rouse & Co
Rowarth Nutrition College
ROYAL COLLEGE OF MIDWIVES
Royal College of Paediatric & Child Health
ROYAL COLLEGE OF PAEDIATRICS & CHILD HEALTH
Royal College of Physicians
Royal Commission on Environmental Pollution
ROYAL DANISH EMBASSY
Royal Free Hospital Hampstead Campus
ROYAL HALLAMSHIRE HOSPITAL
Royal Institute of Public Health
Royal London Hopsital
Royal National Institute for the Blind
ROYAL PHARMACEUTICAL SOCIETY OF GREAT BRITAIN
Royal Society for Mentally Handicapped Children & Adults (MENCAP)
Royal Society for the Promotion of Health
RSSL
RUPERT STANLEY COLLEGE OF FURTHER EDUCATION
RUSSELL HUME
RYVITA CO LTD
S & D Chemicals Limited
S M A NUTRITION
S&N UK
SAFEPHARM LABORATORIES LTD
SAMUEL SMITH BREWERY
SANDWELL INFORMATION SERVICE

SCHOOL OF SCIENCE & TECHNOLOGY
Scientific Advisory Committee Nutrition
SCOTCH food co-ordinating committee
SCOTCH WHISKY ASSOCIATION
SCOTTISH EXECUTIVE RURAL AFFAIRS DEPT
Scottish Federation of Meat Traders Association
Scottish Food and Drink federation
Scottish Quality Salmon Ltd
Scottish Wholefoods Collective Warehouse Limited
Sea Fish Industry Authority
SEAFOOD LABORATORIES LTD
Seed Crushers & Oil Producers Association
Seewoo Foods Limited
Sefcol Ingredients Limited
Seven Seas Ltd
Sharon Pickles
Shellfish Association of Great Britain
Shoosmith
Shropshire Borough Council
SHS International Limited
Sikh Council for Inter Faith Relations & Convenor of the Sikh Network
Sikh Missionary Society UK
SIMKINS PARTNERSHIP
SIMMONS & SIMMONS SOLICITORS
SIMPLY ORGANIC - Serious Food Company
SIMTOM FOOD PRODUCTS
SiS (Science in Sport) Ltd
Six Continents Retail
Sleaford Quality Foods Limited
SLOUGH BOROUGH COUNCIL
SMA NUTRITION
SMALL INDEPENDENT BREWERS ASSOCIATION
SMH CONSULTANCY
Snack, Nut & Crisps Manufacturers Association
Society of Homeopaths
Sodexo Business & Industry
Soil Association
Solgar
SOLGAR VITAMIN AND HERB
Somerfield Stores Limited
Sonnenberg
South West Conservatives
Southall Area Community Network
SPRING Singapore
ST GEORGE'S HOSPITAL MEDICAL SCHOOL
ST IVEL SPREADS
STAFFORDSHIRE COUNTY ANALYST
STARBAKE YORKSHIRE LTD
STEPHEN RHODES ASSOCIATES
STOKE ON TRENT CITY COUNCIL
Strugar Nutrition Centre
STUTE FOODS LTD

Suffolk Saucery Limited
Sugar Bureau
Surrey County Council
Surrey Trading Standards
Sustain: the alliance for better food and farming
TAMESIDE METROPOLITAN BOROUGH COUNCIL
Tate & Lyle PLC
TAYLOR JOYNSON GARRETT
Tesco Stores plc
The caring clinic
The Dairy Council
The European Consumers' Organisation
The Food Commission
The Nutrition Society
THOMAS LOWNES and Co Ltd
Thompson & Capper
THOMPSON & CAPPER LTD
THORNTONS PLC
TOAST
Tony Mace Marketing
Trading Standards Institute
Traditional Farmfresh Turkey Association
Transport & General Workers Union
TREATS ICE CREAM LTD
TULIP INTERNATIONAL (UK) LTD
Tulip UK
U.S. Embassy
UCB Pharma Limited
Udex Ltd
UK Action Committee on Islamic Affairs
UK Association Of Frozen Food Producers
UK VLCD Industry Group
UNIGREG LIMITED
Unilever Plc
UNILEVER R&D
Unilever UK limited
Union of Muslim Organisations of UK & Eire
Union PSD
UNITED BISCUITS (UK) LTD
United Foods International
UNITED GROUP RMD
United Kingdom Register of Organic Food Standards
United Kingdom Vineyards Association
University of Birmingham
UNIVERSITY OF BRADFORD
UNIVERSITY OF CENTRAL LANCASHIRE
UNIVERSITY OF LEICESTER
University of Liverpool
University of Reading
UNIVERSITY OF SOUTHAMPTON
university of Sussex
University of Wales Institute Cardiff

Univ-Vibe Export Ltd
VEGA - Vegetarian Economy and Green Agriculture
Vegan Society
Vegetarian & Vegan Foundation
VEGETARIAN SOCIETY
Vegetarian Society of the United Kingdom
Venture Foods (UK) Limited
Vibrantlife Ltd
VINEGAR BREWERS FEDERATION
Vitrion UK Ltd
VOICEVALE LTD
Vydex Nutrition
Waitrose Ltd
Wales TUC
Walker & Sons (Leicester) Ltd
WALKERS CHARNWOOD BAKERY
WALSALL METROPOLITAN BOROUGH COUNCIL
Warburtons Ltd
WARWICKSHIRE COUNTY COUNCIL
WEETABIX LIMITED
Wellfoods Ltd
Welsh Assembly Government
Welsh Consumer Council
Welsh Food Alliance
Welsh Local Government Association
Wessex Foods
WEST BERKSHIRE DISTRICT COUNCIL
WEST YORKSHIRE JOINT SERVICES
Western Community Hospital
WESTERN GROUP ENVIRONMENTAL
Westler Foods Ltd
Which?
Whitbread Group Plc
WHITBY SEAFOODS LTD
Whitehouse Consultancy Ltd
WHITWORTHS FOODS GROUP LTD
WICKHAM LABORATORIES LTD
Wild Oats Natural Foods
William Morrison Supermarkets Plc
WILTSHIRE COUNTY COUNCIL
WILTSHIRE DIRECT SERVICES
Wine and Spirit Trade Association
Wm Morrison Supermarkets Plc
Women's Farmers Union
Womens Food & Farming Union
Woods Supplements
WORCESTERSHIRE COUNTY COUNCIL
Worthing Society for the Blind
www.clearlabelling.com
XYROFIN (UK) LTD
Yakult UK Ltd
York Nutritional Laboratory

YORKSHIRE PANTRY (THE)
Youngs Seafood
Zoroastrian Trust Funds of Europe

And other Interested parties