

08 September 2022

URN: PLGEN22052

Letter category: Policy, Legislation & Guidance

Classification: Official

Priority type: Digest

Notification: Standards

Keywords: EU exit, transition, transitional provisions, labelling, FBO address

Food law enforcement and port health authorities in England

Extension of Transition Period for Labelling Changes resulting from EU Exit

Summary: Labelling changes resulting from EU exit that were due to apply from 1 October will be deferred until 1 January 2024.

Dear colleague,

Local authorities (LAs) will wish to be aware that specific labelling changes resulting from EU exit that were due to apply from 1 October 2022 will now apply from 1 January 2024.

In April, the UK Government announced a delay to remaining import controls on EU goods entering Great Britain (GB), in recognition of the significant supply chain impact due to Russia's illegal invasion of Ukraine and the recent rise in global energy costs. Labelling changes resulting from EU exit will also be delayed in GB.

As a result, businesses in GB can continue to use labelling stock for up to an additional 15 months before changing to packaging and labelling that comply with the new rules. In general, this means EU labelling terms (such as 'non-EU' origin) and EU addresses can continue to be used until 31 December 2023. This announcement also extends the deadline to use "UK/EC" identification marks for the same time period.

What is affected?

- **Food Business Operator (FBO) address requirements.** Businesses can continue to use an EU, GB or NI address for the FBO on pre-packaged food or caseins sold in England until (and including) 31 December 2023.
- Labelling of:
 - **Beef and veal** - Labels can refer to 'non-EU' if the animal the beef or veal came from was born, reared or slaughtered outside of the EU until 31 December 2023.

From 1 January 2024, businesses must use 'non-UK' when the full individual country information is not available

- **Minced meat** - businesses can continue to refer to 'EU' and 'non-EU' when the label does not list each country of origin, until 31 December 2023. From 1 January 2024, businesses must use 'non-UK' or 'UK and non-UK' when the label does not list each country of origin.
- **Honey** - businesses can continue to use the current origin wording up until 31 December 2023, if the label was accurate at the time. This means businesses can continue to use one of the following:
 - 'blend of honeys from more than one country' (or similar wording)
 - 'blend of EU honeys'
 - 'blend of non-EU honeys'
 - 'blend of EU and non-EU honeys'
- **Olive oil** - for olive oil blends sold in GB, businesses can continue to refer to 'EU' and 'non-EU' when the label does not list each country of origin until 31 December 2023. From 1 January 2024, businesses cannot use the term 'non-EU' for olive oil blends sold in GB.
- **Eggs** - in GB, businesses can continue to mark eggs that do not meet domestic egg trade regulations as 'non-EC standard' or 'non-UK standard' until 31 December 2023. From 1 January 2024, businesses should mark these eggs as 'non-UK standard'.
- **Wine** - labels can continue to have an EU importer address. From 1 January 2024 wine entering the UK must have the address of a UK based importer shown on the label 'prefixed' by the words 'importer' or 'imported by'.
- **Fruit and Vegetables** - for mixes of fruit and vegetables sold in GB, businesses can continue to refer to 'EU' and 'non-EU' until 31 December 2023. From 1 January 2024, businesses must use 'non-UK' or 'UK and non-UK' when the label does not list each country of origin.
- **Quick-frozen foodstuffs** - businesses can continue to use an EU address until (and including) 31 December 2023. From the 1 January 2024 any quick-frozen foodstuff placed on the market needs the business name and address of the manufacturer or packer, or of a person established within the United Kingdom who places that foodstuff on the market.

- **Extraction solvents** - businesses can continue to use an EU address until (and including) 31 December 2023. From 1 January 2024, labels, packaging and containers or documents that accompany extraction solvents, must provide the name and UK address of the legal person responsible for them.
- **Identification marks for continued use of “UK/EC” mark.** Businesses can continue to use “UK/EC” identification marks, until (and including) 31 December 2023. This is for Products Of Animal Origin (POAO) placed on the market in England. It is not applicable to POAO produced in the UK for placing on the EU, Northern Ireland or non-EU markets. This would allow FBOs to continue to deplete existing stocks of labels, wrapping and packaging carrying the ‘UK/EC’ identification mark owned by the food business operator at the end of the Transition Period, it is not intended to enable businesses to replenish old stocks of labels etc.

Please contact the Local Authority Engagement team at LAengagement@food.gov.uk if you have any questions.

Yours sincerely,

Peter Quigley

Deputy Director of Regulatory Services