The right for every consumer for proper and correct information about a food product is the fundamental rule behind food labelling. Labelling should provide all the necessary information on the properties of the food. For this reason, food labelling is regulated by a myriad of regulations which are updated regularly.

What to look for on a food label?
A label of a food product must be clearly legible and accurate in detail. The contents of a food label must not be misleading particularly as to the characteristics of the foodstuff. Products put on the Maltese market bearing labels which are not in Maltese, English or Italian languages are illegal. The only exception to this is infant formulae, the labelling of which must be in Maltese or English.

What information should a food label contain?
The mandatory information that a food label should carry is the following:

(1) Name of the product or name under which the product is sold. Brand names are not obligatory.

(2) List of ingredients. This should be in decreasing order of weight and should be preceded by the word ‘Ingredients’. The list of ingredients is not compulsory if the product is made of one ingredient only.

(3) Quantity of certain ingredients. If a product name includes a particular ingredient, eg. ‘Chicken Pie’, then the list of
ingredients should include as percentage how much chicken is actually used in the product.

(4) Net weight or volume of the product.

(5) Date of minimum durability. In case of highly perishable foods, the ‘Use by’ date should be used. Note that the term ‘Expiry date’ does not exist in Maltese legislation. Other foodstuffs may be labelled with the term ‘Best Before’ or ‘Best Before End’. The dates printed should be in the following order Day/Month/Year to avoid confusion to consumers.

(6) Conditions for storage. In case the product requires special storage.

(7) Name or business name and address of manufacturer or packer or seller established in Malta or the European Union.

(8) Origin. Origin is only obligatory where failure to give such details might be misleading to the consumers to the origin of the foodstuffs. Certain foods however dictate specific rules and for example in case of honey and beef, the origin is obligatory.

(9) Instructions for use. This is required when if such instructions are not laid down, it would be difficult for consumers to make correct use.

(10) Alcohol content. In case of alcoholic beverages with more than 1.2% by volume of alcohol, the actual alcoholic strength in %.

(11) Allergy advice. Ingredients which may cause allergies, e.g nuts, must be declared on the label with a clear reference.

(12) GMOs. Products containing genetically modified organisms must carry the notice ‘This product contains GMOs’.

(13) Nutritional Information. Pre-packed products which carry a nutritional claim that is permitted in the Annex of Regulation (EC) No 1924/2006, such as: ‘low fat’, ‘rich in fibre’, etc., must carry nutritional information expressed per 100g or 100ml.

There are some exceptions to the above information. Taking for example salt - this does not need to have a list of ingredients, if nothing is added to it. Neither does it need to carry a durability date, since salt in itself is a preservative. On the other hand, there are products which need specific information, such as eggs, honey, chocolate and poultry.

Misleading information

Information on a food label should not be misleading as to the characteristics of the food it represents, in particular as to the nature, identity, properties, composition, quantity, durability, country of origin and method of manufacture or production.

A label should not indicate that the particular food has any properties which it does not possess and should not suggest that the food possesses special characteristics when in fact all similar food products possess such.
Figure 1. A typical food label

Broccoli & Cheese Quiche
short crust pastry case filled with broccoli, free range egg and cheese

INGREDIENTS
(Great worst mill, milk, spatch, (28%) wheat flour, egg (free range)
(12%) vegetables, oil (8%) reconstituted, cream (5%)
seasoning mix: onion, garlic, nutmeg, paprika, black pepper, salt.

NUTRITION

Energetic
Calories
Protein
Carbohydrate
Fat
Sugar
Salt

350g

Suitable for freezing
Suitable for vegans

ALLERGY ADVICE
Contains egg, gluten, cows milk, sulphites

STORAGE ADVICE
Home freezing: freeze and store up to 3 months
And within 1 month after opening
Figure 2. Understanding the food label

List of ingredients

Name of the product

Nutritional Information

Date of minimum durability

Conditions for storage

Business name and address

Net weight of the product
Also, a label should not suggest by means of the appearance, description or pictorials, the presence of a particular food or ingredient, while in reality an ingredient or component used in that food has been substituted with a different component or ingredient. An example to this is the recent horsemeat scandal, where horsemeat was substituted for beef by several manufacturers, however declaring the product as containing beef and not mentioning the horsemeat in the list of ingredients.

Nutritional Information
Present legislation does not require that all foodstuffs carry a nutritional information. However, if these are laid, these have to conform with strict rules. There are two type of nutritional labelling; the short version (Energy, Proteins, Carbohydrates and Fats) and the extended version (Energy, Proteins, Carbohydrates (of which sugars), Fats (saturates, etc), Fibre and Sodium). Nutrients must be listed in the order mentioned beforehand and the information should be expressed per 100g so as to give the consumer the possibility to compare foodstuffs.

Nutritional, Health and Medicinal Claims
EC Regulation 1924 of 2006 was a breakthrough in labelling. This regulation stipulates what claims are allowed in food and the minimum requirement for food to satisfy that claim.

Nutrition claim
Any claim which states, suggests or implies that a food has particular beneficial nutritional properties due to:
(a) the calorific value it
   (i) provides; (ii) provides at a reduced or increased rate; or (iii) does not provide and/or
(b) the nutrients or other substances it
   (i) contains; (ii) contains in reduced or increased proportions; or (iii) does not contain.

A ‘Health claim’ is any statement about a relationship between food and health. The European Commission authorises different health claims provided they are based on scientific evidence and can be easily understood by consumers.

The European Food Safety Authority (EFSA) is responsible for evaluating the scientific evidence supporting health claims.

On the other hand, a ‘Medicinal Claim’ is a health claim which states or implies that a product has the property of treating, preventing or curing disease. Medicinal claims on food labels are prohibited under European labelling regulations.

Enforcement of Labelling Rules
Enforcement of labelling regulations is mainly entrusted to the Health Inspectorate Services, who through its regular inspections of food business operators ensure that labels conform to
present requirements. From January till July, over 3346 labels were checked during 1714 visits to operators ranging from retailers to producers and wholesalers. Of the labels checked, 466 labels were found to contain some 587 defects. Most of defects were related to improper ingredient listing (230) but varied to manufacturer details, nutritional information, etc.

The actions taken vary depending upon severity of defect and the most common action taken was relabelling of the product (112 cases) and the least common was a contravention (1 case).

Changes in Regulations
Labelling regulations within EU countries are updated regularly. The first General Labelling Directive was published in 1979 and has been updated and amended several times subsequently. The latest regulation (Regulation EU 1169/2011) was published in January 2011, but will become effective on the 13th December 2014, with the exception of the new mandatory nutrition labelling requirement which will be effective from 13 December 2016. An FAQ on this regulation can be viewed here.

The Environmental Health Directorate wishes once again to remind the public that complaints may be submitted by phone on 21337333 or by email on complaints.ph@gov.mt. You are also invited to join the facebook page of the Environmental Health Directorate at URL: https://www.facebook.com/pages/Environmental-Health-Directorate-Malta/145027878928626?ref=hl

References
Labelling of Food Products – Information leaflet by the Food Safety Committee for the Food Safety week 2011;
Food labelling in the European Union - http://www.foodlaw.rdg.ac.uk/label.htm