

A planning guide for implementing FIC labelling changes

Stephen Spice, Head of Regulatory Affairs, Campden BRI

Stephen.spice@campdenbri.co.uk

Having worked on the practical implementation of getting the requirements of FIC onto a physical label, I understand how difficult and daunting this task can seem. While a three year transition period might have seemed generous at the outset, here we are nearly two and a half years on and it is only fairly recently that we have seen converted products starting to appear. In my view this has in no small part been because of the difficulties companies have faced when trying to fully understand what is required of them and quite sensibly they have been waiting for certainty. But the clock hasn't stopped ticking and at some point you simply have to get on with it, quite possibly with some issues still outstanding.

With the typical lag time from planning a label redesign to its appearance on the shelf being about six months, it is fair to say that the December 13th deadline for FIC changes is now looming large. Of course the size of the task is magnified when you consider that it is a matter of changing all labels, rather than just a select few, and for some the enormity of the task is now hitting home.

Having a good plan to meet the December 13th deadline is obviously key, and can ensure not only that the relabelling process is accomplished in time, but also with the minimum cost and risk of product recall. So what constitutes a good plan? In my experience, the following steps are essential and should be suitable as a blueprint for either checking your own plan or developing a new one.

- 1. Book the printers.** Getting labels printed might seem to be one of the last stages in the process but there is likely to be a huge demand on printers' time this year. Many tens of thousands of labels will be getting converted at about the same time and there is a real risk that there will be capacity issues as the year goes on. Giving them as much notice as possible of your plans will be essential to delivering the project.
- 2. Get the knowledge.** You and your team will obviously need to be crystal clear as to how FIC regulations affect your product labels. This can be accomplished through reading, but also consider training courses and workshops. We are seeing an increased demand for in-house workshops where we cover FIC and any recent updates, and talk through issues specific to that business. We would be pleased to discuss how we can support you with training. Bear in mind that such training could benefit more than just your technical team, as there are others that would find it useful, such as marketing staff, designers, copywriters and reprographics staff.
- 3. Bring your labelling policies up to date.** It might seem like mission impossible condensing forty-six pages of legislation down to a 'one-pager' but creating a simple 'crib sheet' will help visualise the changes that you need to put in place – you might consider constructing a 'before' and 'after' image of a label to help with this. This is also useful for internal communication with your teams, so that everyone understands the changes and can flag up any potential issues. With the minimum font size, space really will be the final frontier, particularly on small labels, so a pecking order of what voluntary information stays on should there be some spare space will help speed up reprographics work. Once you have updated your labelling policies it would be a good idea to get them checked and signed off. If you have a primary authority relationship with your local trading standards that would be a good starting point; we, of course, would also be pleased to assist.
- 4. Look under the bonnet of your electronic specification system.** Not everyone uses one but pack copy (the raw material for reprographics people generating artwork) is commonly generated these days using an electronic specification system of some sort. Clearly the FIC means necessary changes to labelling policies and this could mean that you have to update your specification system to accommodate them. This can take time but whilst you are at it, it would be a great opportunity to give the data there a good spring clean!
- 5. Create a schedule.** At the same time that you are laying the groundwork on the policies side, you should also be creating a batting order in which labels are going to be tackled. It may not be immediately obvious, but there is a real opportunity here to save yourself some time. I suggest that some labels are better put later in the schedule, for instance where we are waiting for implementing regulations or where they have stand-alone energy 'pings' expressed as calories. This could save you from having to make a second set of changes later in the year. The schedule should also include a bit of a sense check around feasibility – will it be physically possible to deliver the work with the resources you have available? If not, this is an excellent time to line up a 3rd party

supplier to help with specification work, label changes and checks, and this is again an area where we can offer assistance. And finally, it's worth highlighting that there is time beyond the December 13th transition date for products that have been 'placed on the market'. This means that so long as your product has been packed and is in the supply chain (not necessarily on the supermarket shelf) before December 13th 2014 it can continue to be sold through in its old non-FIC livery. This might be something useful to consider, particularly if you deal with products that have a long shelf life.

- 6. What about distance selling?** If you sell food or drink on-line there are changes you should be aware of. FIC significantly increases the amount of information that must be provided, with nearly all the mandatory information for a physical label now being required on line as well, with the understandable exception of the durability date. All this information has to be made available before the purchase is concluded. The deadline for change is the same as for a physical label but you might want to get it completed a little earlier to avoid the risk of a substantial system failure disrupting your website in the vitally important run up to Christmas 2014.

- 7. Flag up any grey areas ASAP.** It is inevitable that nothing is ever simple (least of all labelling regulations) and there will be some cases where you are not sure about the best approach to take. A good example would be country of origin labelling where we have recently seen the first implementing rules published with the prospect of several others to follow in due course. Understanding what the implications are of these implementing regulations can be difficult; for instance the effect of using a voluntary declaration of origin 'produced in the UK' in the address line. For these questions, you may need to contact a 3rd party, and again our team of advisors is on hand to help; they are fielding over 4000 questions on these topics a year and are very experienced in lending support. Besides saving you money by avoiding mistakes, third party advice also constitutes a part of your due diligence, so ensure that the advice is logged and documented

- 8. Create some new labels.** I would approach this by selecting some quite different products, both in content and size, as the starting point. This will again help to flag up any problems and identify where a rethink may be required. For example, with the new requirements for minimum font size and an increase in mandatory information, smaller sized products present a challenge. But with a bit of careful thinking around areas such as how ingredient lists are represented, and challenging whether all of the information is actually mandatory (!), it may be possible to create the space. This might create a situation where labelling policies need to be reviewed, so the earlier the better on this task.

- 9. Creating the new labels.** With all the groundwork laid, this should now go like clockwork!

- 10. Independent validation.** Whether you are drawing up the new labels in house, or commissioning the work through a 3rd party, it will be a great idea to get a selection of your labels independently

checked and do this early in the process just in case there is a problem! The proportion of the labels is down to your calculations around risk, but again choosing a broad variety of types of products and product sizes is advisable. You may wish to start with a small number of independent checks, but increase the number if you find that there are problems, to keep the budgets down. Again, our team is able to do these checks for you should you need the support. As a part of the validation process, I'd also suggest that you look at competitor products to establish how they are responding to the regulations. This is especially useful when looking into a particular aspect such as minced meat composition standards or country of origin information. This comparison is something that you could do yourself, or commission with us if you require support around interpretation and advice on how to proceed.

I hope that this quick run through of the essential parts to planning the implementation of FIC is helpful. After 15 years working in this area for a leading retailer, I have a very good understanding of how difficult it is to implement such broad changes and what a challenging year this will be for the industry. If you would like some more in depth help, for example a workshop to help you set up a suitable plan, please feel free to contact me to arrange this. And, as I said above, our regulatory affairs team is available to answer your questions, provide bespoke training and check your labels.

Contacting us:

You may contact me directly at Stephen.spice@campdenbri.co.uk, or contact our team through regulatoryadvice@campdenbri.co.uk

For a summary of some of the key changes being brought about by the new legislation, send an e-mail to auto@campdenbri.co.uk with the subject line: **send FIR**

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