

DATA COLLECTION ON POSSIBLE IMPACTS OF LABELLING CHANGES

The Directorate General for Health and Consumer Protection is currently considering a number of labelling issues. In order to provide a more coherent basis for the proposals made, we have launched a dialogue with our key stakeholders in our established consultative fora, to define the foundations of our approach. This questionnaire is intended to provide information on selected aspects of labelling.

PRIVACY STATEMENT

Please be sure to **indicate** if you **do not consent** to the **publication of your personal data or data relating to your organisation with the publication of your response**.

The contact data provided by the stakeholder make it possible to contact the stakeholder to request a clarification if necessary on the information supplied.

By responding to this consultation you automatically give permission to the Commission to publish your contribution unless your opposition to publish your contribution is explicitly stated in your reply. The Commission is committed to user privacy and details on the personal data protection policy can be accessed at:

http://europa.eu/geninfo/legal_notices_en.htm#personaldata

Profile of respondent

1. Size of enterprise:

	1 -9 employees		50-249 employees
	10-49 employees		> 249 employees

2. Business sector (NACE code if known) :

3. Main office is based in (country/city) :

4. Approximate turnover per annum (euros)

	<50.000		250.000-500.000
	50.000 – 250.000		>500.000

5. In which of the following sector(s) is your company active. Please, indicate approximately the number of different products manufactured

	Sector	Number of products
	Baby food or other dietetic foods	
	Bread, cakes, biscuits	
	Breakfast cereals	
	Coffee and tea	
	Confectionary	
	Savoury snacks	
	Convenience, ready made, meals	
	Dairy products, ice cream	
	Fruit and vegetables	
	Butter/margarine/oils	
	Meat, poultry, fish	
	Processed meat products	
	Sauces, seasonings, condiments	
	Soft drinks	
	Bottled waters	
	Alcoholic drinks	
	Other – please specify	

6. Approximate number of stock keeping units (i.e. individual labels) do you have?

	Approximate number of stock keeping units
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7. On average how often do you, on your own initiative, change or renew the labelling on your products?

Frequency for changing labels	once per year	once every 1-2 years	once every 2-3 years	less often than every 3 years (please, give details)

On average what percentage of the stock keeping units' labels would be changed per year?

...%	Percentage of the stock keeping units' labels changed per year
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8. Do you export your products to other EU Member States?

	Yes
	No

If yes, could you, please, indicate in how many different countries you are exporting your products.

1 to 5	6 to 10	11 to 15	16 to 20	21 to 25

Cost and reasons for modification of labels

9. Estimated capital cost (in euro) of producing a new label?

10. What is the estimated cost (in % of the cost per unit:)

a) of the modification of the label for reasons of (a) new requirement(s)?

b) of having different labels for different countries (for SMEs selling in various countries)?

11. What is the main reason for changing a product label?

	Change in legal requirements
	Change in product recipe
	Update design of the label
	Voluntary inclusion of new information
	Others (please, briefly explain)

12. When designing a new label what is the order of priority of the following issues:

	Meeting legal requirements
	Legibility of the label
	Voluntary inclusion of new information
	Attractiveness of the label
	Brand image
	Other (please, briefly explain)

General and origin labelling

13. Do you consider that existing mandatory labelling requirements applicable to your foodstuffs are not relevant to your products?

	Yes
	No (pass to question 14)

If yes, please, state which and why:

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14. Do you consider that other particular/s should be added to the current mandatory requirements?

	Yes
	No

If yes, please indicate it/them, justify and evaluate the direct economic cost, if any, (in % of the cost per unit):

Other particular(s)	
Estimated cost	...%

15. Do you think that further prescription/clarification are necessary as regards:

	Yes	No	Comments
The content of the label			
The format of the label			
The size of the text			
Multilingual labelling			
Others			

16. In your view, what will be the most appropriate way to introduce further prescription?

	European legislation
	National legislation
	Guidance documents
	Voluntary codes of conduct developed by industry

Please justify briefly:

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17. Are you satisfied with the present situation leaving to Member States to lay down detailed labelling requirements where no implication arises on the Single Market (e.g non pre-packaged food):

	Yes
	No

Please justify briefly:

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18. Do you consider that it is necessary to include further information on the origin of products on the label? Please, briefly explain.

	Comments
Yes	
No	

19. Do you include information on the origin of the product on your labelling?

	Yes
	No

a) If yes, why is it included?

	Mandatory requirement
	Voluntary

b) If included on a voluntary basis, does this information represent a commercial advantage for your products?

	Yes
	No

20. If there are other reasons to provide or not information on the origin of products, could you, please, briefly describe them?

21. If mandatory origin labelling is to be considered, could you evaluate the impact on your products?

Positive impact (+)			Negative impact (-)		
No or insignificant impact	Moderate impact	Significant impact	No or insignificant impact	Moderate impact	Significant impact

Please, justify briefly:

22. Origin label of multi-ingredient products, such as ready meals, would be more complex if origin labelling becomes mandatory. Which would be the easier option for this kind of products?

	Indicate just the origin of the most important or relevant ingredient
	Indicate the origin of the most important/relevant ingredient + the place of processing
	To provide a longer period of implementation
	Exempt this kind of products from origin labelling
	I do not know
	Other

Please, justify briefly

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23. If increased harmonisation of origin labelling is to be considered, in your view, what will be the most accurate way to introduce the obligation of indicating the origin of products on the label?

	European legislation
	National legislation
	Guidance documents
	Voluntary codes of conduct developed by industry

Please justify briefly:

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Nutrition labelling

24. Do you include nutrition information on your products?

	Yes
	No

If yes, on which basis?

	Mandatory
	Voluntary

If yes, which information do you include?

	Group 1 – energy value, protein, carbohydrate and fat
	Group 2 - energy value, protein, carbohydrate, sugars, fat, saturated fats, fibre and sodium
	Nutrition information on other nutrients

If yes, what is the nutrition information based on:

	Analysis of the product
	Calculation from the known or actual average values of the ingredients used
	Calculation from generally established and accepted data

25. If you do include nutrition information on your products, do you think that it increased the cost of production?

	Yes
	No
	Not applicable

If yes please can you estimate the costs (in % of the cost per unit).

	Estimated costs
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26. The usual way for displaying nutrition information is in numerical format which is mentioned in the legislation. Do you voluntarily provide nutritional information in an alternative format?

	Yes
	No

If yes, please indicate how or where the information is provided.

	Comments
Front pack	
Off label (e.g. in a separate leaflet or on a website)	
Other (please, specify)	

27. If increased harmonisation of nutrition labelling is to be considered, in your view, what will be the most appropriate way to introduce the obligation?

	European legislation
	National legislation
	Guidance documents
	Voluntary codes of conduct developed by industry

Please, justify briefly:

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Legibility of labelling

28. Differences in packaging size may make it difficult to establish rules for the presentation of labelling information (text size, etc). If you do include an ingredient list and/or nutrition information on you labels, please can you indicate the range of font sizes that you use:

	Smallest font size	Largest font size
Ingredients list		
Nutrition labelling information		