

Food labelling for butchers

In the guide

- Fresh meat: general
- Fresh meat: beef and veal
- Fresh meat: pork, poultry, mutton, lamb and goat
- Cooked meat and meat products
- Descriptions
- Eggs
- Cheese
- Weights and measures
- Trading standards
- Key legislation

Note: although the United Kingdom has left the European Union, certain pieces of legislation (formally known as 'retained EU law') will still apply until such time as they are replaced by new UK legislation; this means that you will still see references to EU regulations in our guidance.

This guidance is for England and Wales

A number of legal requirements affect butchers regarding the labelling and composition of fresh meat, cooked meat and meat products.

Food for sale to consumers needs varying degrees of labelling. Beef, veal, pork, mutton, lamb, goat meat and poultry meat have specific legislation governing their labelling. Specified meat products have a legal definition and very specific labelling requirements. Butchers also need to take care when using such terms as 'smoked' and 'traditional' as these are also subject to legal and restricted definitions.

Fresh meat: general

Loose fresh meat displayed for sale should be labelled with the name of the food. The name of the food should be precise, giving the type of meat and accurately describing any cut that you declare - for example, sirloin steak, frying steak, loin chops or mutton mince. Meat that has been treated with proteolytic enzymes must be described as 'tenderised'.

Products must not contain more than the maximum permitted level of additives listed in the Food Additives, Flavourings, Enzymes and Extraction Solvents (England) Regulations 2013 and the Food Additives, Flavourings, Enzymes and Extraction Solvents (Wales) Regulations 2013.

Sulphur dioxide is only permitted in burger meat containing a minimum 4% rusk or vegetable content, or sausages, and at a set level of 450 mg/kg. As it is an allergen, its presence must be declared. For further

information on allergen labelling see 'Food allergens and intolerance'.

If any meat product contains added proteins originating from a different animal, this must be stated in the name of the food.

If you produce or sell uncooked cured or uncured meat products with the appearance of a cut, joint, slice, portion or carcase of meat, that contain more than 5% water, you must include the words 'added water' in the name of the food.

If the meat product contains any other added ingredients apart from these, whether or not this needs to be included in the name of the food should be determined on a case-by-case basis in accordance Regulation (EU) No 1169/2011 *on the provision of food information to consumers*.

A limited number of types of fresh meat have 'protected designation of origin' status, based on breed, geographical origin or farming method. More information on protected food names, including a list of UK registered names, is available on the GOV.UK website.

Fresh meat: beef and veal

Beef and veal must be labelled in compliance with the Beef and Veal Labelling Regulations 2010 and the Beef and Veal Labelling (Wales) Regulations 2011. Please see 'Labelling of beef'.

Fresh meat: pork, poultry, mutton, lamb and goat

In order to comply with the Country of Origin of Certain Meats (England) Regulations 2015 and the Country of Origin of Certain Meats (Wales) Regulations 2015, fresh, chilled and frozen pork, poultry, mutton, lamb and goat meat has to be labelled with the country of rearing and country of slaughter (or country of origin where these are the same). Please see 'Labelling of poultry and other meats'.

Cooked meat and meat products

A 'regulated product' is defined in the Products Containing Meat etc (England) Regulations 2014 and the Products Containing Meat etc (Wales) Regulations 2014 as "a food that contains one of the following as an ingredient (whether or not the food also contains any other ingredient): (a) meat; (b) mechanically separated meat....; (c) the heart, the tongue, the muscles of the head (other than the masseters [cheeks, which are considered to be meat]), the carpus [lower forelimb], the tarsus [lower hindlimb], or the tail of any mammalian or bird species recognised as fit for human consumption".

Meat products sold loose must be accompanied by a label with the name of the product, meat content, details of any allergens, irradiated ingredients and added water in excess of 5%, as for fresh meat. Additionally, many meat products - such as sausages, burgers, pasties and pies - are subject to compositional requirements. Detailed information on this can be found in 'Composition of meat products'.

When producing meat products, you will need to ensure your recipe and manufacturing method produces goods that comply with their legal definition, with particular regard to meat content. Recipes should be written down and you should check all ingredients - spice blends, for example - for the presence of any allergens, which must be declared.

Meat is legally defined as skeletal muscle with specified amounts of adherent tissue (connective tissue and fat); it does not include offal. Mechanically separated or mechanically recovered meat (MSM or MRM)

cannot count as part of the meat content as the cell structure of the meat is altered during the process of recovery so that it no longer meets the legal definition of meat. The associated levels of fat and connective tissue that may be counted towards the meat content vary for different species. After this level is reached, then the connective tissue and fat must be declared separately on any ingredients label (for instance, pork rind or beef fat) and cannot be counted towards the meat content.

There are different methods currently used to work out meat content from a cut of meat:

- 'visual lean'. This is the simplest method and is most suitable for smaller retail butchers
- a simple meat content calculator is attached here
- 'CLITRAVI analysis'
- 'nitrogen testing' (for single species only)

The last two methods are only suitable for manufacturers who know the analytical values of the nitrogen content of the cuts of meat that they use.

Meat products only need to be labelled with their country of origin if it would be misleading not to do so.

Descriptions

Be aware that there are legal and restricted definitions of many terms used to describe the products discussed in this guide. Examples of these terms are:

- 'breast'. It should be clear if products are made from chopped and shaped / reformed cuts of meat
- 'smoked' products should be distinguished from products that have not been smoked but contain 'smoke flavouring'
- 'lean' and 'extra lean' should be sufficiently different to standard products
- 'gluten free'. Ensure your herb or spice mixes used in products are also gluten free. There is a legal limit for a gluten free claim of 20 ppm/kg and unless you are completely confident on your recipe and ingredients you should have a finished product tested to verify the claim
- 'kosher' and 'halal' have very specific legal definitions, and you should clarify with your slaughterhouse or supplier whether your products comply with these requirements
- 'free range', 'outdoor reared' and 'local' should be confirmed in writing by your supplier
- 'farmhouse', 'traditional', 'home made' - these terms have specific meanings and should not be used unless accurate

Eggs

There are a number of requirements for sales and descriptions of eggs. Please see 'Retail sale and labelling of eggs' for information about this subject. Information on trade regulations for eggs is also available on the GOV.UK website.

Cheese

Ensure that the labelling of the variety of any cheeses you sell loose is accurate. Many varieties of cheese have a 'protected designation of origin'. More information on protected food names, including a list of UK registered names, is available on the GOV.UK website.

Cheese does not require ingredients listing for lactic products, enzymes and microbiological cultures, only for added ingredients to the cheese (such as herbs or fruit) and the presence of allergens.

Weights and measures

For information regarding weighing and measuring requirements for products sold loose and/or prepacked, please see 'Weights and measures for butchers'.

Trading standards

For more information on the work of trading standards services - and the possible consequences of not abiding by the law - please see 'Trading standards: powers, enforcement and penalties'.

Key legislation

Food Safety Act 1990

Beef and Veal Labelling Regulations 2010

Beef and Veal Labelling (Wales) Regulations 2011

Regulation (EU) No 1169/2011 *on the provision of food information to consumers*

Food Additives, Flavourings, Enzymes and Extraction Solvents (England) Regulations 2013

Food Additives, Flavourings, Enzymes and Extraction Solvents (Wales) Regulations 2013

Food Information Regulations 2014

Products Containing Meat etc (England) Regulations 2014

Products Containing Meat etc (Wales) Regulations 2014

Country of Origin of Certain Meats (England) Regulations 2015

Country of Origin of Certain Meats (Wales) Regulations 2015

Last reviewed / updated: March 2021

In this update

No major changes

Please note

This information is intended for guidance; only the courts can give an authoritative interpretation of the law.

The guide's 'Key legislation' links may only show the original version of the legislation, although some amending legislation is linked to separately where it is directly related to the content of a guide. Information on amendments to legislation can be found on each link's 'More Resources' tab.

© 2021 Chartered Trading Standards Institute

Source URL:

<https://www.businesscompanion.info/en/quick-guides/food-and-drink/food-labelling-for-butchers>