CARDIFF METROPOLITAN UNIVERSITY
SCHOOL OF HEALTH SCIENCES
DEPARTMENT OF HEALTHCARE AND FOOD
BSc (Hons) Food Science and Technology

Research Project Academic Paper

Title: Issues faced by small/medium businesses (SMEs) when implementing the Food Information to Consumers (FIC) labelling requirements (Regulation (EU) 1169/2011)

xxxxx

Student Number: xxxxx

2017

Supervisor: Dr Vitti Allender

For the attention of: Dr Ruth Fairchild

Student Declaration In Respect of Individual Work

Dissertation submitted in partial fulfilment of the requirements of Cardiff Metropolitan University for the Degree of Bachelor of Science with Honours. This work has not previously been accepted in substance for any degree and is not being concurrently submitted in candidature for any degree.

Signed:…

Date:…13/03/2017…

I declare that the whole of this work is the result of my individual effort and that all quotations from other authors have been acknowledged. Where corrections services have been used the extent and the nature of the correction is clearly marked in a footnote.

Signed:…

Date:…13/03/2017…
I hereby give my consent for the research project, if accepted, to be available in the open source repository D-space for use inside and outside the University.

Signed:…

Date:…13/03/2017…

I hereby give consent for my research data and/or portions of my report to be used by my supervisor in the creation of academic articles for publishing, provided that I have appropriate authorship on these papers.

Signed:…

Date:…13/03/2017…
Abstract

Regulation EU 1169/2011 Food Information to Consumers (FIC) was introduced in 2011. All aspects had to be integrated fully into all food businesses despite their size throughout the UK by December 2016. Issues faced by small/medium enterprises (SMEs) with implementing FIC compared with those of large businesses were deemed to be far greater due to their circumstances within the industry (Bremmers, 2012). Qualitative data on the issues faced by SMEs was collected through an unstructured interview of open-ended questions and a questionnaire (McLeod, 2014). The sample was purposively sampled; the company interviewed was known to the researcher and the participants of the questionnaires were taken from the Welsh Food and Drink Directory 2015/2016 (Creswell et al, 2007). One interview was conducted followed by the distribution of seventy one questionnaires, thirteen responses were received back. The main themes found from this research were the financial burden of implementing new labelling requirements, difficulty with nutritional labelling, time, the importance of informing the consumer through labelling and the lack of knowledge that SMEs had to introduce this large piece of legislation. Sub themes arising from the questionnaire responses and the interview were costs, where they found guidance and how they dealt with implementing FIC altogether. SMEs overall found implementing FIC ‘neither easy nor difficult’ (Q21 of questionnaire); and had to be resourceful to achieve the labelling requirements of FIC.

Keywords: legislation, SMEs, difficulties, guidance, cost, nutritional

Paper category – research paper

Introduction

SMEs are small medium enterprises with generally between 50 and 250 employees altogether with a turnover of less than 10 million (small business) or 50 million (medium business) (European Commission, date not given).

Food legislation is an integral part of the food industry needed to keep all food manufacturers working to the same code. The introduction of new legislation requires time and resources to implement; it was highlighted that SMEs may find this task more challenging than larger companies with many resources (Spice, 2014).
Legislation updates occur quite frequently however the difference with FIC was the scale at which changes were demanded.

The industry wide scope of FIC enforced a standardisation of labelling and allowed movement between European Union states; stated in article three, chapter II. This research project was needed as FIC involved all food companies and SMEs were part of this change (Regulation (EU) 1169/2011 (FIC), 2011). Gathering issues of implementation of FIC could be taken into account when new legislation is enforced to aid SMEs in its implementation.

With the use of the recitals for FIC and guidance documents written it was clear that FIC was not implemented to burden businesses but to make labelling simpler for consumers. Avoidance of unnecessary burdens was commented on in recital 39 in relation to nutritional labelling (Regulation (EU) 1169/2011 (FIC), 2011).

The time period given for the implementation of FIC from 2011 to December 2016 was in ratio with the large task in order. The time given to seek guidance and opinions as well as print new packaging increased the chance that FIC would be implemented correctly. The length of time given to businesses to implement FIC portrayed the magnitude of the task at hand. Mandatory nutritional labelling, one of the areas of change for packaging had more than one deadline for completion. Voluntary nutritional labelling could be implemented at any time through 2011-2016 and mandatory nutritional labelling was not required until December 2016.

Previously noted as an issue for SMEs with implementing FIC was the complex wording of the legislation and the confusing layout; this may lead SMEs to misunderstand what was expected of them (FSA, 2014). Robinson, 2014 stated that the cost of nutritional analysis and the added work that would be required to implement FIC were two main issues that SMEs would face (Robinson, 2014).

Research into the issues faced by SMEs in implementing food labelling regulations on such a large scale could aid with future legislative changes; to assist in a smooth transition, to understand how SMEs can be helped to prevent mistakes and provide guidance to the industry as a whole.

Currently it is understood that costs and a lack of knowledge hinder SMEs, however this research has outlined further themes for SMEs, e.g. uncertainty of implementing
FIC, the burden of nutritional labelling, the importance of the consumer and the time required to implement (Robinson, 2014).

Qualitative research forms the entirety of this research article.

**Aim**

To determine issues faced by SMEs when implementing FIC.

**Objectives**

- To determine personal experiences and issues of introducing the FIC labelling requirements; through the use of an interview with a food company and a questionnaire sent out to several SMEs
- To outline the main themes and issues found by the companies by analysing the data obtained from interview and questionnaire

**Materials and Methods**

This research project consists of qualitative data, in the form of themes, counts, representative quotes and graphs. Data collection was in the style of an interview and questionnaire.

Exploratory research was undertaken to determine the issues that SMEs came in contact with during the implementation of FIC food labelling requirements. The project was a pilot study aimed to give initial feedback that could then be used to structure a larger project. The unstructured approached was used to determine issues faced by SMEs in implementing FIC; the variety of issues was investigated therefore an unstructured approach of data collection was necessary (Kumar, 2011).

Creswell, (2003), explains the importance of obtaining ethical approval before beginning data collection. The necessarily of signatures from the participants, outlining the reason for the collection of data and what they could expect from the interview and questionnaire all had to be included in the participant information sheet and participants consent sheet (please see the appendix) (Creswell, 2003). Ethical consideration was approved by the Cardiff Metropolitan ethics panel that gave approval for the interview and questionnaires. Two ethics forms were submitted to
the panel; the first for the interview and then one for the questionnaires. The interviewee, the Operations and Directions Manager was handed their participant information sheet and participant consent sheet and the questionnaire participants were emailed the sheets which accompanied the questionnaire.

An interview was conducted initially with the Operations and Directions Manager of an SME bakery. From initial research into the possible issues that SMEs would face with FIC aided in the development of the interview questions. An unstructured interview was undertaken containing open-ended questions (McLeod, 2014). The Operations and Directions Manager was able to expand on questions when they needed to; lots of detail was obtained through the interview and themes began to emerge. The detailed answers collected from the interview were used to structure the questionnaires. The emphasis on nutritional labelling requirements, food industry guidance, costs and timings were particular aspects that were included in the questionnaires highlighted in the interview. The incorporation of an interview before the questionnaire was very beneficial in the development of the questionnaire. As stated by Gillham (2007), a face to face interview can be used before a questionnaire to collect themes for a questionnaire. The use of an interview with one individual initially added complexity to the questionnaire questions (Gillham, 2007).

This research project combined the interview and questionnaire so as the questionnaire could be tailored to ask more appropriate questions. The researcher was less likely to introduce bias by analysing and finding themes of the interview to include in the questionnaire rather than to make guesses as to themes that may have affected the participants of the questionnaire.

One interview was carried out; face to face with a SME Operations and Directions Manager of a bakery, in a previously organised time slot. The interview was recorded on a recording device.

Seventy one participants were sent the questionnaire using the software, Qualtrics (Copyright © 2017, Provo, UT, USA). Qualtrics was used to construct the questionnaire, the finished questionnaire looked professional and all the data was collected onto one system. Qualtrics formed a user friendly questionnaire for the participants (Kumar, 2011). The accompanying email with the questionnaires outlined the deadline for the questionnaire (a month after the email was sent), details
about the project and participant information and consent sheets. Two follow up emails were required due to the response rate being low; each sent shortly before the deadline of the previous email. Overall thirteen questionnaires were received back for data analysis. Some of the questions on the questionnaire were left blank, Gillham (2007), stated that one problem with data collection in the form of a questionnaire is that some will leave questions unanswered (Gillham, 2007).

The sample selection was from the Welsh Food and Drink Directory 2015-2016; of SMEs in Wales. The use of a small sample size provided an impression of the views of the questionnaire participants. Quota sampling was incorporated the Welsh Food and Drink Directory was used to select participants conveniently. A subsection of the industry chosen from the Welsh Food and Drink Directory 2015-2016 were emailed questionnaires; highlighting the issues faced by SMEs in implementing FIC from the perspective of Welsh businesses (Kumar, 2011).

The participants were from several differing sectors of the food industry including dairy, ready to eat products, prepacked products and ambient; all therefore with different problems when implementing FIC associated with their product groups. The range of different industry sectors included created a wider range of qualitative answers and perceptions of FIC (Kumar, 2011). Purposeful sampling technique was used to select the questionnaire and interview participants as the researcher knew that they were connected to the research project (Creswell et al, 2007). The interviewee, Operations and Directions Manager of a bakery, was known to the researcher and the questionnaire participants were chosen from the Welsh Food and Drink Directory, 2015-2016; those who had stated their email addresses in the directory were those that were contacted with the questionnaire.

Interview and questionnaire responses were typed out onto Microsoft Excel. Qualtrics produced a question by question format of the answers given by participants; some in graph form. The themes and subthemes were determined from the Excel document. Counts where determined for each theme and then subthemes identified for each theme. Common themes emerged; cost, nutritional analysis, time, lack of knowledge and the importance of the consumer.
Problems with the use of a questionnaire were the response number of participants. Two follow up emails were required for this study as only a few responses were sent back initially. Data acquired through the interview was in more detail than from any of the questionnaires collected; this could be due to the interview being face to face and the questionnaires taking less time to complete. The use of the interview was very useful to gather a wider and more detailed look at the research question.

**Results/Discussion**

The participant of the interview was from an English artisan bakery and the questionnaires were sent to Welsh companies from the Welsh Food and Drink 2015/2016 Directory.

To increase the response rate of the questionnaires two follow up emails were sent after the initial email. A date of completion was added to each email to inform the participants. The response rate of the questionnaire improved after two follow up emails were sent out. Initially 75 questionnaires were sent to participants. Fourteen questionnaires were received back; 19% response percentage.

Due to FIC being a horizontal measure food business operators (FBO) of all sectors of the industry were affected by FIC. Article I, chapter 1 general provisions of FIC stated, FIC would include all food business operators throughout the food chain (Regulation (EU) 1169/2011 (FIC), 2011). It was important therefore to include different sectors of the food industry in the questionnaire participant sample; including a sauce manufacturer, dairy manufacturer and bakery.

The main findings from this research project were costs encountered, nutritional analysis, the time frame, uncertainty of what to do with the legislation, resources and the importance of informing the consumer (figure 1).
Figure 1: Main themes found from the interview and questionnaire data

Issues faced by small/medium businesses (SMEs) when implementing the Food Information to Consumers (FIC) labelling requirements (Regulation (EU) 1169/2011)

- Consumer
  - Importance of informing the consumer
  - Resources
  - Guidance
  - Internet use
  - Extremely useful

- Costs
  - New machinery
  - Existing packaging
  - Added Expenses
  - Cost Efficiency

- Nutritional Analysis
  - Costs
  - Necessity
  - Difficulty

- Uncertainty/ lack of knowledge
  - Isolation
  - Knowledge gap
  - New business
  - Industry bodies

- Time
  - Enough time = ‘yes’
  - Allocation
  - Ongoing task
  - Time consuming
Figure 2: Costs as an aspect of FIC implementation used for new machinery, existing packaging and added expenses of implementing FIC.

The SME bakery Operations and Directions Manager (interviewee 01) stated that FIC needed to be implemented and it had to be achieved in the least expensive manner.

“Most cost effective way” (Interviewee 01)

All the businesses had to find a way to implement FIC that would have the least effect on the running of the business and meant they achieved the requirement at the lowest cost (figure 2).

Eight questionnaire participants and the interviewee described cost as an issue factor of FIC but only two questionnaire participants and the interviewee answered that this was due to the reprinting of packaging. FIC stated that packaging could be used that did not conform with nutritional analysis requirements of FIC as long as the packaging did not contain nutritional information before December 2016 (Food and Drink Europe, Euro Commerce, 2013).

New machinery was required for an SME bakery to enable them to print the allergens in bold or capitals. This cost would have been a large expense on the company.

The added expense of finding resources that could uncomplicate and provide certainty to the businesses was a costly endeavour for SMEs (Bremmers, 2012).

The increase in font size on packaging to 1.2mm was believed by the Food and Rural Affairs Summary of Responses (2014) to be a large cost to companies when
trying to achieve this new size (Food and Rural Affairs Summary of Responses, 2014). Six questionnaire participants commented that the new font size was a challenge to introduce but did not state cost as a by-product of this.

Newly formed businesses that were set up when FIC was being implemented had less or no existing packaging. Therefore the cost of re-printing packaging was much less than that of other SMEs who had to waste packaging that they could not use after FIC was implemented.

An SME producer of dairy products commented on the expense that went along with the changing of the labels with the addition of nutritional labelling.

‘Cost of changing labels’ (ID 04)

SMEs have to pay for the same changes to packaging as the larger businesses; this is a financial burden to SMEs. One participant expressed how this expense was difficult for them to integrate.

![Nutritional Analysis Diagram](image)

Figure 3: Troubles of implementing nutritional analysis; difficulty, necessity and costs identified

Nutritional analysis tables expressed on the back of products was compulsory for most products the lozenge scheme for the principal field of vision was voluntary.

One questionnaire participant commented that nutritional labelling was not required for the participant’s products.

‘We then discovered that we were classed as exempt from the requirements due to the nature of our sales’ (ID 13)
Recital 39 explained that FIC was not being introduced to increase burdens on food businesses when implementing nutritional analysis. Certain products were exempt including non-prepacked foods and alcohol (Regulation (EU) 1169/2011 (FIC), 2011).

The voluntary nutritional information appearing on the front of products was reflected in the questionnaire participant responses to question fourteen of the questionnaire; 69% commented that they had chosen not to add voluntary nutritional information. Recital 41 of FIC stated that nutritional information could be repeated in the principal field of vision but was a voluntary scheme. The majority of SMEs questionnaire participants opted not to introduce this scheme and not increase their work load further (Regulation (EU) 1169/2011 (FIC), 2011).

More than half of the questionnaire respondents commented that they found the implementation of nutritional information a financial burden on their business (figure 3) (Q13). 69% stated that the cost of implementing nutritional information on their packaging was a cost issue for their business.

Voluntary nutritional labelling advice is not in FIC only in guidance. Misrepresentation of nutritional content of products by larger companies could be a disadvantage for SMEs if FIC and the voluntary lozenges on packs are used to misrepresent a competitor’s product (e.g. using the lozenges in a neutral colour rather than the traffic light colour system). The fact that it was voluntary gave companies a chance to opt out and concentrate on other aspects of FIC; such as the non-voluntary nutritional information required on the back of the product.

A bakery, sandwich and meat producer mentioned the huge task that implementing nutritional analysis on their labels had been.

‘It was a big job and as stated an ongoing task’ (ID 09)

FIC is now a continuous project that SMEs have had to adapt to and continue to use within their companies to make sure they legally adhere to the legislation.

Nutritional analysis can be a long process and timely. A participant of the questionnaire described that colleagues may not be aware of the increased work load that accompanied the nutritional analysis data collection and its addition to
labels (ID09). Another participant responded that they were unsure of the necessity of nutritional information on their products and wondered how many consumers would use the nutritional information when choosing their type of product they make.

Three participants expressed difficulty with the nutritional information that was required as the hardest part of FIC to implement (Q3).

Figure 4: Uncertainty and lack of knowledge surrounding the implementation of FIC and the use of resources

There was not any particular requirement of FIC that all the businesses found difficult to implement. Respondents identified costs and not having the background knowledge to tackle the legislation as issues that made the task difficult. A large cost to food businesses operators is the lack of knowledge to deal with the complex nature of legislation (Bremmers, 2012).

From the interview the data showed that the guidance given to SMEs was not always clear and did not supply them with certainty with how to implement FIC (figure 4). However the questionnaires outlined that with the help they received they actually didn’t struggle too much with the implementation of FIC.
SMEs are at risk of not having the knowledge to tackle large changes in food law such as FIC. An ambient sauce manufacturer of prepacked foods commented on the lack of knowledge and understanding within their company.

‘Lack of knowledge within the business’ (ID 03)

All companies throughout the industry had to implement FIC; however larger companies had wider access to resources and the chance to attend lobbying bodies. The Operations and Directions Manager interviewed stated that a staff member attended an FIC course but expressed the view that more access to conferences and lobbying bodies would have aided the transition to FIC. Isolation from larger companies was mentioned by the interviewee, due to the limited resources they had compared to that of larger businesses. 5 questionnaire respondents mainly relied on internet sources as their main guidance tool.

ID 03 stated that lack of knowledge was the most difficult stumbling block overall for their company (Q4). A large cost to FBO is the lack of knowledge to deal with the complex nature of legislation (Bremmers, 2012).

One questionnaire respondent explained that they were a fairly new business and this enabled them to grow with FIC and this made implementing FIC easier for them as they had less existing packaging and could use FIC as a starting area for their packaging (ID03).

FIC is a project for companies to continuously work on to keep labels meeting legislation. The transition period given to the industry to meet FIC saw few products on the shelves during this time. Spice, 2014 stated that this showed companies were waiting for certainty into exactly how to meet FIC and left completing packaging close to the 13th December 2014 (Spice, 2014).
Figure 5: Theme of time including allocation of time and length given to implement FIC

Food and Drink Europe, 2013, stated that a period of transition was required for businesses to meet FIC requirements. A lengthy time period was issued with FIC from 2011 first issued and December 2016 when all nutritional labelling had to be included on labels too (Food and Drink Europe, Euro Commerce, 2013).

A questionnaire participant stated that FIC would be an ongoing project and labelling would take longer to produce than previously.

‘The ongoing effort in keeping everything up to date is more time consuming’ (ID 09)

Keeping products in line with FIC was timely for the participating SMEs and a project that has to be continued.

Nutritional analysis on back of pack was costly in terms of time for the SMEs

‘The most difficult part was/is allocating the time’ (ID 02)

As busy as any FBO is the need for time to be allocated to updating and planning packaging to meet FIC as well as learning exactly what FIC entailed for them was a timely exercise. Sending products away for nutritional analysis was timely. Robinson, 2014 stated that the introduction of nutritional analysis onto labels would be a costly burden on businesses. The use of nutritional analyses service, cost of samples sent for analysis and softwares would be costly but also take up a lot of SME’s time with its implementation as nutritionals are needed on most products now (Robinson, 2014).
Overall it was a timely venture but ten questionnaire participants expressed the view that enough time was given to them to meet the labelling requirements, (10 answered ‘yes’ to Q20.) Recital 56 of FIC highlighted that FBO needed to be aware of the nutritional analysis changes that would be required by December 2016 far before it was required and have time to implement the requirements.

Figure 6: Usefulness of guidance found by the questionnaire participants in relation to FIC implementation

There was consensus between many of the SMEs as to whom they asked for guidance from. Internet sources and the use of industry bodies were popular amongst the questionnaire and interview participants. Membership with industry bodies such as Cardiff Metropolitan University and Campden BRI were used frequently by many of the participants when they were implementing FIC. Many pieces of guidance are found through the internet with easy access by the SMEs. The knowledge to know how to interpret the guidance and the time to integrate the changes was a challenge.

However contradiction within the guidance was stated by interviewee and a SME. Guidance seemed to contradict one another which made the whole process more difficult.

‘Some aspects were confusing because they were not clearly stated’ (ID 09).
Guidance such as The British Retail Consortium (BRC) guidance on allergen labelling for FIC was an example of guidance for industry whereby best practice and effective FIC labelling was presented. This tool of examples for companies to follow was expressed by questionnaire participants; outlining how to portray different sections of FIC on their labelling (BRC, 2013).

Five questionnaire participants answered that guidance they had used was ‘extremely useful’ (figure 5) (Q7). The majority of the questionnaire respondents used internet resources as their main guidance tool. Three participants commented that they were given examples of similar products to their own to show them how to incorporate FIC requirements for their products.

‘I was shown accurate examples and given detailed advice on how to create product labels’ (ID 02).

Being able to use a template for their products was a useful tool in implementing FIC for them.

![Figure 7: Importance of informing the consumer through labelling](image)

FIC recital 3 outlines the importance of the health and choices of the consumer. The right of the consumer in regards to choosing food for economic, social, ethical reasons should be at the forefront of the reason for FIC and the changes it created for labels. The need for change on labelling clarified allergen labelling. The FSA, 2015 stated that 5-8% of children and 1-2% of adults will have an allergy to one of the EU’s fourteen allergens; and more so are true figure of people affected by allergies/ intolerant is greater. Therefore changes were required to ensure that allergen advice could be easily distinguishable for consumers to ensure their safety and health (FSA, 2015).
Recital 36 of The Commission White Paper brought to the attention that some nutritional information, sugar, saturated fat and sodium should be included as they are linked directly to public health. Sodium had to be replaced by salt to allow consumers to make informed choices about products and lessen confusion with scientific analogies (Regulation (EU) 1169/2011 (FIC), 2011).

Three participants expressed the view that consumers need to be informed about products for several reasons:

“It is essential that consumers are greatly informed about the products they use for a variety of reasons” (ID 02)

FIC was to make packaging uniform and easily read. The consumer should not be misled by any labelling placed on products. The participants of the data collection had a genuine understanding of this fact even if the implementation of FIC was difficult (figure 7). Consumers are increasingly aware of food and how it affects their health; therefore clear and accurate labelling with as much information deemed necessary by FIC is required now.

One company stated that the need for the nutritional analysis on their product may not be needed by their customers, e.g. they would know that a cake was high in fat and sugar, but added the compulsory nutritional labelling as it was a legal requirement.

‘I’m not sure what use it will be to consumers on a biscuit or cake. I guess I’m not sure it’s what they’re really looking for on our products. But obviously we want to comply’ (Interviewee 01)

Finardi, et, al, (2015) argues that the use of compulsory nutritional labelling could make choosing products even more confusing for consumers, who do not have the knowledge to use or understand the new information (Finardi, et al, 2015). It is important to give customers as much information about a product as possible as to not mislead them but it is important that they are not overly informed to the point of information saturation.
FIC was introduced with the intent to ‘avoid unnecessary burdens on food business operators’ when adding nutritional labelling to packaging (recital 39, Regulation (EU) 1169/2011 (FIC), 2011). This can be seen through the responses to the question ‘Overall how difficult did you find implementing FIC on your labelling?’ six participants stated ‘neither easy nor difficult’ and three stated ‘somewhat easy’. Earlier research deemed that the participants would have found the overall implementation difficult and expressed ‘extremely difficult’ as the answer to this particular question. The study found this was not the case.

Questionnaire participants may have been less honest in the questionnaires and wanted to portray a sense of achievement with implementing FIC and therefore may have selected the ‘neither easy nor difficult’ option. Reservations are taken when analysing questionnaire responses as bias and inaccuracies can be stated by the participants; either deliberately or mistakenly. This can decrease the validity of questionnaires and the data they contain (Gillham, 2007).

**Limitations**

The small participant feedback from the questionnaires would be a limitation of this study. A larger size would have provided a larger sample size and more information and opinions on FIC and the issues surrounding its implementation. Anderson, (2010) stated that qualitative research relies on the skills of the researcher and bias...
can affect the project. The amount of data to analyse can make the length of time to decipher qualitative data long (Anderson, 2010).

To conclude the main issue for SMEs of implementing FIC were cost, nutritional analysis, time, their knowledge gap and the importance of the consumer. FIC is an ongoing task for SMEs and the issues outlined in this paper will allow for future research into the wider issues faced by SMEs in the implementation of food legislation.
Legislation referred to


References


McLeod, S, (2014). The Interview Method. Available at: https://www.simplypsychology.org/interviews.html Accessed on 19/03/2017


Qualtrics (Copyright © 2017), Provo, UT, USA. [https://www.qualtrics.com/support/research-resources/cite-reference-qualtrics-research/](https://www.qualtrics.com/support/research-resources/cite-reference-qualtrics-research/)

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Appendix I - Blank questionnaire from Qualtrics

Appendix J - Interview Raw Data from Interview with Operations and Directions Manager of an SME

Appendix K - Questionnaire Raw Data

Appendix L – Themes and Counts from Data

Log book was in hard copy form and handed into Cardiff Metropolitan Izone
Appendix A -

RISK ASSESSMENT FORM 1

MEMBER OF STAFF: Dr Vitti Allender

LOCATION OF WORK: Interview at Angels Ltd

DURATION OF ACTIVITY: 3-4 months to collect data

ACTIVITY TITLE: This project sets out to determine the difficulties faced by SME with the introduction of the new labelling requirements (FIC). Through an interview and questionnaire.

NATURE OF WORK: An interview and questionnaire with members of the food industry.

PEOPLE INVOLVED:

Will the work detailed above involve any of the following hazards?  

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STAFF MEMBER'S CERTIFICATION OF ASSESSMENT

If you have answered no to the seven questions above and are satisfied with the following statement, you should sign and date it, setting a date not more than 12 months hence for the work to be reassessed.

I have reassessed the work outlined above with respect to the School's Health & Safety Policy.

I undertake to review this assessment if the nature of the work should change, or if any unforeseen hazards should be encountered.

*This assessment will be reviewed not later than 30/07/17*

*This project was completed on 28/03/17*

Signed: [Signature]

Print name: Vitti Allender

Date: 28/03/17

* - delete or complete as necessary
Appendix B - Letter of Ethical Approval for Interview

Monday, 14 November 2016

BSc (Hons) Food Science & Technology
Cardiff School of Health Sciences
Dear Applicant

Re: Application for Ethical Approval: Issues faced by SME (small/medium enterprises) businesses in implementing the Food Information to Consumers (FIC) labelling requirements (EU Regulation 1169/2011)

Your ethics application, as shown above, was considered by the Health Care and Food Ethics Panel on 09/11/2016.

I am pleased to inform you that your application for ethical approval was APPROVED, subject to the conditions listed below – please read carefully.

Special Conditions of Approval
1) Consent form needs a logo, footer, boxes should not be ticked initialled. Data storage and destruction and clarify timeframe for withdrawal.

Please confirm by email to cshsethics@cardiffmet.ac.uk that you understand the "special conditions of approval" and that where changes to the information sheet, consent form and/or procedures are deemed necessary, these have been carried out as requested. If you are a student – your supervisor must do this.

Standard Conditions of Approval
1. Your Ethics Application has been given a Project Reference number as above. This MUST be quoted on all documentation relating to the project (E.g. consent forms, information sheets), together with the full project title.
2. All documents must also have the approved University Logo and the Version number in addition to the reference and project title as above
3. A full Risk Assessment must be undertaken for this proposal, as appropriate, and be made available to the Committee if requested.
4. Any changes in connection to the proposal as approved, must be referred to the Panel/Committee for consideration without delay quoting your Project Reference Number. Changes to the proposed project may have ethical implications so must be approved.
5. Any untoward incident which occurs in connection with this proposal must be reported back to the Panel without delay.
6. If your project involves the use of human samples, your approval is given on the condition that you or your supervisor notify the HTA Designated Individual of your intention to work with such material by completing the form entitled “Notification of Intention to Work with Human Samples”. The form must be submitted to the PD (Sean Duggan), BEFORE any activity on this project is undertaken

This approval expires on 09/11/2017. Please set a reminder on your Outlook calendar or equivalent if you need to continue beyond this approval date. It is your responsibility to
reapply / request extension if necessary.
Yours sincerely
Prof. Arthur Tatham
Chair of Department of Healthcare and Food Ethics Panel
Cardiff School of Health Sciences
Llandaf Campus

Western Avenue, Cardiff CF5 2YB
Tel : 029 2041 7125
E-mail : atatham@cardiffmet.ac.uk
Cc: Allender, Vitti

PLEASE RETAIN THIS LETTER FOR REFERENCE
Appendix C - Participant Information Sheet for the Interview with the Operations and Directions Manager of an SME

Project: This research project sets out to identify the issues faced by SMEs (small/medium enterprises) businesses in implementing the Food Information to Consumers labelling requirements (EU Regulation 1169/2011).

Researcher: xxx

University: Cardiff Metropolitan University

Ethics approval number: 

Background

This research project sets out to identify the issues faced by SMEs (small/medium enterprises) businesses in implementing the Food Information to Consumers labelling requirements (EU Regulation 1169/2011).
The Food Information Regulation was introduced in July 2014 with new legislation for packed, pre-packed and non-packed products. Covering all the aspects of product packaging. The Food Information for Consumers (FIC) was introduced on 13th December 2014 to aid the food industry in establishing this new legislation. Nutritional information on packaging is going to become compulsory for products in December 2016.

Your Involvement

The focus group will require you to answer several questions about the Regulation (EU) 1169/2011 on Food Information to Consumers (FIC); how it has affected your business and the problems you have faced. The focus group should take no longer than 1 hour of your time.

Risks

There are no risks to you when taking part in this focus group. There are no right or wrong answers. You can leave the focus group at any time with out giving a reason or request your answers be removed from the transcript.

When the information is discussed in the written project participants will be anonymous for example references such as ‘Bakery SME Technical Manager’ will be used. Storing of results will be on a password protected computer and pen drive.

What Happens to Results

The focus group will be audio recorded and typed out to create a questionnaire for other small medium enterprises. When all the data has been collected, counts, themes and representative quotes and other data representations will be used and analysed in the final research project.
Further information:
If you have any questions please don’t hesitate to contact:
Dr Vitti Allender
Cardiff Metropolitan University
vallender@cardiffmet.ac.uk
Appendix D - Participant Consent Sheet for the Interview with the Operations and Directions Manager of an SME

Project: This research project sets out to identify the issues faced by SMEs (small/medium enterprises) businesses in implementing the Food Information to Consumers labelling requirements (EU Regulation 1169/2011).

Researcher: Miss xxxxx

University: Cardiff Metropolitan University

Ethics approval number:

Please tick the boxes if you accept the statements below.

- I consent to taking part in this research project focus group.

- I have read the participant information sheet and understand the research project being undertaken. I have been able to ask questions concerning the project and have received answers.

- I am willing to take part in this research project and understand I can leave the focus group if I want without giving a reason.

- I agree to the recording of the focus group.

- I agree that any of my anonymised quotes may be used in the final written project.

______________________________  __________________________
Signature of participant          Date

______________________________  __________________________
Name of person taking consent    Date

______________________________  __________________________
Signature of person taking consent  Date
Appendix E - Questions used in Interview with the Operations and Directions Manager of an SME

Introduction to the interview

Hello everyone, thank you for taking part in this interview today looking at the issues faced by small medium enterprises such as you when Regulation (EU) 1169/2011 on Food Information to Consumers (FIC) was introduced.

Is everyone still ok to begin this interview? You can leave at any time through out if you need.

Focus Group Prompt Sheet -

1. Regulation (EU) 1169/2011 on Food Information to Consumers (FIC) was introduced in December 2014, when did your business first become aware of the FIC labelling requirements that would be needed on your packaging?

2. Who informed you about the FIC? Was it initially other companies that informed you or food organisations or colleagues at other business for example?

3. What pieces of information and advice did you use in implementing FIC? Are there any useful or non-useful pieces of information that you can remember?

4. What were the main issues you have faced with its implementation of FIC?

5. Which aspects of FIC did you find had changed the most for your products?

7. Which type of product did you find the most difficult to implement the labelling requirements?

9. Have you heard of other SME having issues with implementing FIC?

10. How do you feel as a business about the compulsory introduction of nutritional labelling on your products in December this year?
11. Are you using pieces of information and advice in relation to the new nutritional requirements that have to be implemented? Have these come from other business, food bodies or food industry representatives?

12. Have there been any problems with the introduction of the compulsory nutritional labelling?

13. As a SME has the cost of implementing nutritional labelling on your packaging been a burden to your business?
Appendix F - Letter for ethical Approval for Questionnaires

Friday, 16 December 2016

BSc (Hons) Food Science & Technology
Cardiff School of Health Sciences
Dear Applicant

Re: Application for Ethical Approval: nd Part: Issues faced by SME (small/medium enterprises) businesses in implementing the Food Information to Consumers (FIC) labelling requirements (EU Regulation 1169/2011)

Ethics Reference Number : 8676

Your ethics application, as shown above, was considered by the Health Care and Food Ethics Panel on 21/12/2016

I am pleased to inform you that your application for ethical approval was APPROVED, subject to the conditions listed below – please read carefully.

Standard Conditions of Approval

- Your Ethics Application has been given a Project Reference number as above. This MUST be quoted on all documentation relating to the project (E.g. consent forms, information sheets), together with the full project title.
- All documents must also have the approved University Logo and the Version number in addition to the reference and project title as above.
- A full Risk Assessment must be undertaken for this proposal, as appropriate, and be made available to the Committee if requested.
- Any changes in connection to the proposal as approved must be referred to the Panel/Committee for consideration without delay quoting your Project Reference Number. Changes to the proposed project may have ethical implications and so must be approved.
- Any untoward incident which occurs in connection with this proposal must be reported back to the Panel/Committee without delay.
- If your project involves the use of human samples, your approval is given on the condition that you or your supervisor notify the HTA Designated Individual of your intention to work with such material by completing the form entitled “Notification of Intention to Work with Human Samples”. The form must be submitted to the PD (Sean Duggan), BEFORE any activity on this project is undertaken

This approval expires on 21/12/2017. Please set a reminder on your Outlook calendar or equivalent if you need to continue beyond this approval date. It is your responsibility to reapply / request extension if necessary.

Yours sincerely

Prof. Arthur Tatham
Chair of Department of Healthcare and Food Ethics Panel
Cardiff School of Health Sciences
Llandaf Campus
Western Avenue, Cardiff CF5 2YB
Tel : 029 2041 7125
E-mail : atatham@cardiffmet.ac.uk
Cc: Allender, Vitti

PLEASE RETAIN THIS LETTER FOR REFERENCE
Appendix G - Participant Information Sheet for Questionnaire Participants

**Project:** This research project sets out to identify the issues faced by SMEs (small/medium enterprises) businesses in implementing the Food Information to Consumers labelling requirements (EU Regulation 1169/2011).

**Researcher:** Miss xxxxx

**University:** Cardiff Metropolitan University

**Ethics approval number:**

**Background**

This research project sets out to identify the issues faced by SMEs (small/medium enterprises) businesses in implementing the Food Information to Consumers labelling requirements (EU Regulation 1169/2011).

The Food Information Regulation was introduced in July 2014 with new legislation for packed, pre-packed and non-packed products. Covering all the aspects of product packaging. The Food Information for Consumers (FIC) was introduced on 13\(^{th}\) December 2014 to aid the food industry in establishing this new legislation. Nutritional information on packaging is going to become compulsory for products in December 2016.

**Your Involvement**

The questionnaire will require you to answer 20 questions about the Regulation (EU) 1169/2011 on Food Information to Consumers (FIC); how it has affected your business and the problems you have faced. The questionnaire should take no longer than 15 minutes of your time.

**Risks**

There are no risks to you when taking part in this questionnaire. There are no right or wrong answers.

When the information is discussed in the written project participants will be anonymous for example references such as ‘Bakery SME Technical Manager’ will be used. Storing of results will be on a password protected computer and pen drive.

**What Happens to Results**

Please save your questionnaire and email back to the researcher. When all the data has been collected, counts, themes and representative quotes and other data representations will to be used and analysed in the final research project. Storing of results will be on a password protected computer and pen drive. You have the right to withdraw any answers you give after completion of the questionnaire. Please do so within 3 weeks after submission of questionnaire.

Further information:
If you have any questions please don’t hesitate to contact:
Dr Vitti Allender
Cardiff Metropolitan University
vallender@cardiffmet.ac.uk
Appendix H - Participant Consent Sheet for Questionnaire Participants

**Project:** This research project sets out to identify the issues faced by SMEs (small/medium enterprises) businesses in implementing the Food Information to Consumers labelling requirements (EU Regulation 1169/2011).

**Researcher:** [Redacted]

**University:** Cardiff Metropolitan University

**Ethics Approval Number:** [Redacted]

Please place your initials in the boxes below if you accept the statements.

I consent to taking part in this research questionnaire.

I have read the participant information sheet and understand the research project being undertaken. I have been able to ask questions concerning the project and have received answers.

I agree that any of my anonymised quotes may be used in the final written project.

I am aware that I have the right to withdraw any answers I give after completion of the questionnaire. I know is within 3 weeks after sending back the questionnaire to the researcher.

Storing of results will be on a password protected computer and pen drive.

My completed questionnaire will be destroyed when the data has been used in the final project.

______________________________________________
Signature of participant                        Date

______________________________________________
Name of person taking consent                Date

______________________________________________
Signature of person taking consent              Date

1 Copy for Researcher; 1 Copy for Participant
Appendix I - Blank questionnaire from Qualtrics

What sector of the food industry does your business fall under, e.g. Bakery, confectionary, meat etc?

Do you sell pre-packed foods, non pre-packed foods or both?
- Pre-packed Foods
- Non Pre-packed Foods
- Both pre-packed and Non pre-packed foods

The Regulation (EU) Food to Consumers (FIC) (1169/2011) was issued in 2011, for implementation in 2014 and nutritional analysis introduction to back of pack in 2016. What was the most difficult part of FIC to implement for your company?

Why was this the most difficult part of FIC to implement?

Who did you receive most guidance from?
- Industry bodies such as Campden BRI, Food Standards Agency etc.
- Other Small/Medium Enterprises
- Colleagues
- The internet
- Customers
- Suppliers
- Consultants

Which product did you find most difficult to implement FIC for? Why?

What guidance did you use while implementing FIC?

How useful was the guidance you found?
- Extremely useful
- Very useful
- Moderately useful
- Slightly useful
- Not at all useful

What was the reason behind you finding the guidance useful or not useful?

What was the most useful piece of guidance you used and why?
Blank questionnaire from Qualtrics Continued

What sector of the food industry does your business fall under, e.g. Bakery, confectionary, meat etc?

Do you sell pre-packed foods, non pre-packed foods or both?
- Pre-packed Foods
- Non Pre-packed Foods
- Both pre-packed and Non pre-packed foods

The Regulation (EU) Food to Consumers (FIC) (1169/2011) was issued in 2011, for implementation in 2014 and nutritional analysis introduction to back of pack in 2016. What was the most difficult part of FIC to implement for your company?

Has your company decided to use the voluntary nutritional information on front of pack? If so for what products?

Has the 1.2mm minimum font size affected you with respect to fitting all your information on pack?

Have you had to invest in new machinery due to FIC? If so please state what type of machinery?

Did you have a lot of packaging that you had to throw away due to FIC labelling?

Did you find FIC overall easy to implement and understand or was it quite difficult and often confusing?

Has implementing FIC been a financial burden on your business?

Did you feel you had enough time to implement FIC into your business?

Overall how difficult did you find implementing FIC on your labelling?
- Extremely easy
- Somewhat easy
- Neither easy nor difficult
- Somewhat difficult
- Extremely difficult
Appendix J -
Interview with a small medium business (SME) about the issues faced by SMEs when implementing Food Information to Consumers (FIC) labelling requirements (Regulation (EU) 1169/2011)

Interviewee - SME Operations and Directions Manager
Date - Thursday 17th November 2016
Interviewer - xxxxx
ID = ID01

<table>
<thead>
<tr>
<th>Person Speaking</th>
<th>Question or Reply</th>
</tr>
</thead>
<tbody>
<tr>
<td>Interviewer</td>
<td>So thank you for taking part, for answering these questions today.</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>That's ok.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>Looking at issues faced by small medium enterprises such as your selves when implementing regulation 1169/2011 on Food Information to Consumers. Are you still ok to start?</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>Yep that's fine.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>And you can leave at any time if needed.</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>Ok.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>Regulation 1169/2011 on Food Information to Consumers FIC was introduced in December 2014, when did your business first become aware of the FIC labelling requirements that you would need for your packaging?</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>I think trying to remember back it was probably 9-12 months before the December date and possibly longer, but I can't remember totally. So yeah it was a good while before it came into force. We do get regular updates from the likes of Campden and IFSQM and stuff on what's coming up and at us and stuff, so it was about that time.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>Who informed you about the FIC? Was it initially other companies that informed you or food organisations?</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>As I said it was Campden initially I think, we also heard from some of our customers, they started contacting us, saying what are you doing about this, some of the bigger ones that are probably lobbying out there, they knew the legislation was coming before it sort of hit. So they were obviously more aware of it being out in the industry lobbying and sitting on the panels that write these legislation they started contacting us quite early on to sort of notify us I guess and also see what we were doing and what action we were doing and going to take.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>What pieces of information and advice did you use in implementing FIC? Were there some really useful or not so useful pieces of information?</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>Yeah, I think we looked at many different things to see which the best way for us as a business cost effective way to find out. There was a lot of different training courses looking at this. There was a lot of different you know seminars and stuff, obviously they were end up being costly to, we did try and look at the most cost effective way. The technical manager did go on a training course, I can't remember who it was with it was like a practical labelling course for it. We did obviously a lot of our own research through Campden cus we're members, the FSA and some of our customers also provided information back to us as well so they help go well this is the legislation you tell us what you are going to do about it and this is what we expect and stuff so that was useful. So yeah I suppose Campden was our biggest source, phone them for advice as we are members of the. Which helps because you are members</td>
</tr>
<tr>
<td>Interviewer</td>
<td>SME Operations and Directions Manager</td>
</tr>
<tr>
<td>Interviewer</td>
<td>SME Operations and Directions Manager</td>
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<tr>
<td>Interviewer</td>
<td>SME Operations and Directions Manager</td>
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<tr>
<td>Interviewer</td>
<td>SME Operations and Directions Manager</td>
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<tr>
<td>Interviewer</td>
<td>SME Operations and Directions Manager</td>
</tr>
<tr>
<td>Interviewer</td>
<td>SME Operations and Directions Manager</td>
</tr>
<tr>
<td>Interviewer</td>
<td>Were there certain product that was more difficult to implement the labelling requirements on? Or was it just any flow wrapped product?</td>
</tr>
<tr>
<td>-------------</td>
<td>--------------------------------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>Um, yeah it probably all our products were equally difficult. We've got the flow wrapper which on one hand is easier to change because we can change that in house but printer wasn't able to print as we would have liked it to be. Pre-printed packaging obviously we've got to wait for the next print run or site to write off quite a few thousand things, but actual product, that I guess some of the, say the Sour Cherry Bakewell you know our Almond Moon it's got three layers and has a very long ingredients list dec, trying to fit that on a small Daylesford U-card all that ingredients dec, all the nutritional and everything else. Wasn't an easy job to do; and to get the right minimum font height and everything else. So yeah just fitting everything on has been challenging.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>So how do you feel overall as a business about the compulsory introduction of nutritional labelling for this December?</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>Um, my worry is that obviously nutritionals we can calculate we can't as a business analyse every single product for nutritionals, I don't think we can afford that cost but also you know they might slight change. I don't have an issue with doing it; I'm not sure what use it will be to consumers on a biscuit or cake. I guess I'm not sure it's what they're really looking for on our products. But obviously we want to comply. I have to say, so yeah I think, yeah if we need to have it on there we need to have it on there its almost putting it on there for the sake of it but...</td>
</tr>
<tr>
<td>Interviewer</td>
<td>And the pieces of information or advice in relation to the nutritional requirements, did you also get that from food bodies like Campden?</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>The which sorry? Sorry, say that again.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>Are you using pieces of information and advice in relation to the new nutritional requirements from places like Campden and online again?</td>
</tr>
<tr>
<td>SME Operations and Directions Manager</td>
<td>Yeah, Campden, online, customers, suppliers, anywhere we can sort of pick brains and pull information in. There's always even when we have audits people go oh did you know this, this bit, it's not always easy to find what's out there but you know Google doesn't always come up with such stuff. But it is yeah talking with others and within the industry. I would like to do it more, I like to go out more and do the planning as an industry stuff so you can find out a bit more. I suppose we are slightly isolated, we're smaller we don't have the a lobbying team or a legislation team that go out and actively find this information so we do have to rely on waiting for it to come in. Which is always, sometimes months behind some of the rest of the industry because they're out actively looking, you know. It would be good to just have a bit more I suppose information sort of fed to us but it's knowing where we get that information fed to us from. I do use Campden a lot because obviously working there previously I do end up picking their brains quite a bit, and they do a lot of horizon scanning and do a weekly legislation update and stuff. But it would be nice if it was just one little pack from the FFS FSA and go right here's your here's how you do it would be quite nice, so, because obviously we are trying to interpret it ourselves and what does that mean and how does that mean. So yeah it would be good to have more advice because it's one thing finding the information and legislation but it's how do we practically do that within the business. Because obviously as a small business we just got to go with what we think. Because there's not that many people out there to talk advice through. Campden will they'll give advice but they won't give you a definite answer, the only people who will give you a definite answer is like Trading standards and FSA but they won't give you an answer through until you've got a problem, if they makes sense and so there's not unless you've use consultants but again their it's only their advice or their thoughts so it's not what would the FSA do if we don't do it correctly so, we just try our best.</td>
</tr>
<tr>
<td>Interviewer</td>
<td>As an SME has the cost of implementing nutritional labelling on packaging been a burden would you say to your business?</td>
</tr>
</tbody>
</table>
Yeah. Probably in one word yes. As I said it’s not just writing of packaging or re having to print it when we don’t need to re print it’s actually also the time taken to check the labelling, review the labels with the you know invested in Nutricalc to help to do nutritionals. So yeah it’s been a time consuming and expensive thing. And like I said I’m not sure for our products what benefit it would be for consumers to have that information. Maybe it will and maybe I’m wrong maybe people think cakes don’t have fat or sugar in. But yeah I think, yeah I guess the consumer more information they have they can make informed choices can’t they. But for us as a business I would have, I would have liked a little more help or leeway, cause it was implemented everybody the same it doesn’t matter how big of a company you were or how small a company you were everybody it was implemented all the same for everybody. Whereas some legislation you know the smaller you are the more leeway you have and then the bigger ones don’t get leeway because they can, whereas this is across the board and everybody has to do it at the same time, the same thing, so it was harder for us to manage the cost and absorb the cost of it. But also feedback to our customers, because sometimes they provide the packaging and we’ve had to go back and so actually your packaging you’ve just provided for us is ok for now but in a years’ time it won’t be and stuff like that. So it’s taken a bit to manage and then to make sure it’s all gone.

Yeah so it’s not used.

Interviewer

SME Operations and Directions Manager

Interviewer

SME Operations and Directions Manager

Interviewer

SME Operations and Directions Manager

Interviewer

SME Operations and Directions Manager

Interviewer
### Appendix K - Questionnaire Raw Data for Issues faced by small/medium businesses (SMEs) when implementing the Food Information to Consumers (FIC) labelling requirements (Regulation (EU) 1169/2011) - xxxxx

#### Participants ID 02 - 05

<table>
<thead>
<tr>
<th>ID numbers of participants</th>
<th>02</th>
<th>03</th>
<th>04</th>
<th>05</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Questionnaire Questions</strong></td>
<td>Bakery</td>
<td>Ambient Sauce Manufacturer</td>
<td>Dairy</td>
<td>Bakery</td>
</tr>
<tr>
<td>What sector of the food industry does your business fall under, e.g. Bakery, confectionary, meat etc.?</td>
<td>Non pre packed foods</td>
<td>Prepacked foods</td>
<td>Pre-packed foods</td>
<td>Both pre-packed and non pre-packed foods</td>
</tr>
<tr>
<td>Do you sell pre-packed foods, non-packed foods or both?</td>
<td>It was all rather straight forward. Once the premise of what had to be included on the labelling was understood it was easy to implement. The most difficult part was/is allocating the time to create/update each label as it required detailed research and thorough accuracy examinations.</td>
<td>To abide with the requirements. It was not very easy to digest the FIC as the business is still very new and not familiar with the requirements of the food industry.</td>
<td>cost of changing labels</td>
<td></td>
</tr>
<tr>
<td>The Regulation (EU) Food to Consumers (FIC) (1169/2011) was issued in 2011, for implementation in 2014 and nutritional analysis introduction to back of pack in 2016. What was the most difficult part of FIC to implement for your company?</td>
<td>My staff and I are already very busy maintaining and growing the business so we had and still have to find time to create new and constantly update existing labels.</td>
<td>Lack of knowledge within the business and on the sector.</td>
<td>the additional costs</td>
<td></td>
</tr>
<tr>
<td>Why was this the most difficult part of the FIC to implement?</td>
<td>consultants</td>
<td>Industry bodies such as Campden BRI, Food Standards Agency etc.</td>
<td>Suppliers</td>
<td>Industry bodies such as Campden BRI, Food Standards Agency etc.</td>
</tr>
<tr>
<td>Question</td>
<td>Guidance and Information</td>
<td>Useful</td>
<td>Comments</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>------------------</td>
<td>-------------------</td>
<td></td>
</tr>
<tr>
<td>Who did you receive most guidance from? Industry bodies such as Campden BRI, Food Standards Agency etc. Other Small Medium Enterprises, Colleagues, The internet, Customers, Suppliers, Consultants?</td>
<td>All of my products are very similar. We make tray bakes; chocolate brownies, cakes, caramel shortcakes amongst others. Therefore, once the first one was created, the format was basically the same for each one.</td>
<td>Legibility of the font size and spacing. Allergen Information.</td>
<td>all the same</td>
<td>None</td>
</tr>
<tr>
<td>Which product did you find most difficult to implement FIC for? Why?</td>
<td>Cardiff Met University food technology department.</td>
<td>We were signposted to Adventa (Monmouthshire C. Council) for support available from UWIC</td>
<td>good advice from label manufacturer</td>
<td>Local FSA</td>
</tr>
<tr>
<td>What guidance did you use while implementing FIC?</td>
<td>Extremely useful</td>
<td>Extremely useful</td>
<td>Extremely useful</td>
<td>Very useful</td>
</tr>
<tr>
<td>How useful was the guidance you found? Extremely useful, very useful, moderately useful, slightly useful or not at all useful?</td>
<td>I was shown accurate examples and given detailed advice on how to create product labels.</td>
<td>One to one session was provided. We were able to look at the allergens and highlight that on our labels. We were able to have a EU proved labels under the guidance and support that we received</td>
<td>label company knew what was required</td>
<td>Ongoing advice</td>
</tr>
<tr>
<td>What was the most useful piece of guidance you used and why?</td>
<td>The examples of similar products to mine</td>
<td>as above - one to one support and advise</td>
<td>nothing in particular</td>
<td>Discussion with FSA Officer</td>
</tr>
<tr>
<td>The nutritional back of pack labelling was implemented in December 2016. How did you feel as a business about this compulsory introduction of nutritional labelling on your products?</td>
<td>It is essential that consumers are greatly informed about the products they use for a variety of reasons. Nutritional information, with the correct guidance, is not difficult to calculate. Therefore, I was happy to include this information on my products.</td>
<td>We had this done ahead of December 2016 but early 2015</td>
<td>no view</td>
<td>We were already implementing such labelling</td>
</tr>
<tr>
<td>Have there been any problems with the introduction of the</td>
<td>Not for us</td>
<td>Not after receiving the support we got but would</td>
<td>no, just costs.</td>
<td>No</td>
</tr>
</tbody>
</table>
### Compulsory Nutritional Labelling

<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>As an SME has the cost of implementing nutritional labelling on your packaging been a burden on your business?</td>
<td>Mildly</td>
<td>No because the business started around about the same time of FIC being implemented and we received the right support to address the matter so this did not cost us a lot in terms of changes to labels. We had also receive grant for the support received.</td>
</tr>
<tr>
<td>Has your company decided to use the voluntary nutritional information on front of pack? If so for what products?</td>
<td>No</td>
<td>Yes for all our sauces</td>
</tr>
<tr>
<td>Has the 1.2mm minimum font size affected you with respect to fitting all your information on pack?</td>
<td>We have had to edit the format of our labelling and change some label sizes.</td>
<td>No, managed to fit within the space available</td>
</tr>
<tr>
<td>Have you had to invest in new machinery due to FIC? If so please state what type of machinery.</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Did you have a lot of packaging that you had to throw away due to FIC labelling?</td>
<td>No</td>
<td>No - we used it all up. I would not have thrown any packaging away</td>
</tr>
<tr>
<td>Did you find FIC overall easy to implement and understand or was it quite difficult and often confusing?</td>
<td>Easy</td>
<td>It was easy because we had support but would have been a real struggle otherwise</td>
</tr>
<tr>
<td>Has implementing FIC been a burden on your business?</td>
<td>Mildly</td>
<td>Yes</td>
</tr>
</tbody>
</table>

---

Note: The responses indicate a generally positive experience with FIC implementation, with only mild costs and no new burdens.
### Financial Burden on Your Business?

<table>
<thead>
<tr>
<th>Did you feel you had enough time to implement FIC into your business?</th>
<th>There could always be more time - you just have to prioritise and make time</th>
<th>Yes</th>
<th>no</th>
<th>Yes</th>
</tr>
</thead>
<tbody>
<tr>
<td>Overall how difficult did you find implementing FIC on your labelling? Extremely easy, somewhat easy, neither easy nor difficult, somewhat difficult, extremely difficult?</td>
<td>Somewhat easy</td>
<td>Somewhat easy</td>
<td>Neither easy nor difficult</td>
<td>Neither easy nor difficult</td>
</tr>
</tbody>
</table>

### Participants ID 06 – 09

<table>
<thead>
<tr>
<th>ID numbers of participants</th>
<th>06</th>
<th>07</th>
<th>08</th>
<th>09</th>
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<tbody>
<tr>
<td><strong>Questionnaire Questions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What sector of the food industry does your business fall under, e.g. Bakery, confectionary, meat etc.?</td>
<td>Ready Meals</td>
<td>Bakery</td>
<td>Ice-cream</td>
<td>Bakery, cooked meats, butchery, sandwich fillings, sandwiches</td>
</tr>
<tr>
<td>Do you sell pre-packed foods, non-packed foods or both?</td>
<td>Both pre-packed and non pre-packed foods</td>
<td>Both pre-packed and non pre-packed foods</td>
<td>Both pre-packed and non pre-packed foods</td>
<td>Pre-packed foods</td>
</tr>
<tr>
<td>The Regulation (EU) Food to Consumers (FIC) (1169/2011) was issued in 2011, for implementation in 2014 and nutritional analysis introduction to back of pack in 2016. What was the most difficult part of FIC to implement for your company?</td>
<td>As an artisan producer I was not obliged to provide nutritional info but chose to do it as a useful aide in promoting the health benefits of some of my meals. I found the ingredients and allergens fairly straight forward but nutritional info extremely difficult.</td>
<td>Small company needs support from Government as it is not cost effective to employ technicians as we don’t have financial resources hence killing the will to progress and create wealth and jobs.</td>
<td>Nothing is difficult in 2011 to 2014 only having to redesign labels</td>
<td>For me (manufactured foods) - nutritional analysis. For company - procedures had to be implemented to ensure allergen information was available to all customers for not only own manufactured foods but also retail products. &quot;The company&quot; was probably not aware of the work involved in adding nutritional data.</td>
</tr>
<tr>
<td>Why was this the most difficult part of the FIC to implement?</td>
<td>As a small producer weighing, cooking and portioning by</td>
<td>Still as above</td>
<td>We have not had to comply with nutritional</td>
<td>Although the nutritional analysis was already done and reported on</td>
</tr>
<tr>
<td>Who did you receive most guidance from? Industry bodies such as Campden BRI, Food Standards Agency etc. Other Small Medium Enterprises, Colleagues, The internet, Customers, Suppliers, Consultants?</td>
<td>Other Small Medium Enterprises</td>
<td>The internet</td>
<td>The internet</td>
<td>The internet</td>
</tr>
<tr>
<td>Which product did you find most difficult to implement FIC for? Why?</td>
<td>eg a beef stew that has its ingredients perfectly weighed into a pan is then cooked for 2 hours to then be portioned out into smaller ready meals. It is impossible to weigh the now cooked ingredients (in the case of tender beef which will have also broken up into smaller pieces) to ensure the exact percentage/weight of meat/protein is in each dish. This has been an issue when 1 meal from a batch of 12 is taken away for testing.</td>
<td>All of them</td>
<td>All</td>
<td>Part 1 - all the same. Nutritional - Sandwiches products (wraps, paninis etc), a small change to a quantity which would always affect the label QUID could result in a significant change in the nutritional values per 100g and per sandwich</td>
</tr>
<tr>
<td>Question</td>
<td>Response</td>
<td>Rating</td>
<td></td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td>-------------</td>
<td></td>
<td></td>
</tr>
<tr>
<td>How useful was the guidance you found? Extremely useful, very useful, moderately useful, slightly useful or not at all useful?</td>
<td>Moderately useful</td>
<td>Not at all useful</td>
<td>Moderately useful</td>
<td>Moderately useful</td>
</tr>
<tr>
<td>What was the most useful piece of guidance you used and why?</td>
<td>In the food industry we are mainly and mostly passionate about food development and creativity. Technical support government priority.</td>
<td>Moderately useful</td>
<td>See info above. Trading standards could not always answer questions and often I had to find out for myself and tell them. 1169/2011 guidance notes were useful but came out too late, I was asked to review them which indicates that I was up to speed before they were issued. Legislation itself was cumbersome but ok for a definitive check.</td>
<td></td>
</tr>
<tr>
<td>The nutritional back of pack labelling was implemented in December 2016. How did you feel as a business about this compulsory introduction of nutritional labelling on your products?</td>
<td>purchasing a large flatbed scales to help with weighing and portioning (although still doesn't solve problem of amount of beef/potato etc in a stew!)</td>
<td>Net…</td>
<td>Combination of different guidance was useful but overall <a href="http://www.foodlaw.rdg.ac.uk/">http://www.foodlaw.rdg.ac.uk/</a> - easy to navigate, comprehensive information with links to legislation if required.</td>
<td></td>
</tr>
<tr>
<td>Have there been any problems with the introduction of the compulsory nutritional labelling?</td>
<td>As far as I am aware as a small producer I do not have to do it as yet, but have chose to, to be able to promote as &quot;low fat&quot; &quot;high protien&quot; etc</td>
<td>Hard. Still working on it… Big stumple block.</td>
<td>We will not be able to wholesale our products</td>
<td>It had to happen sooner or later. Because of the number of products requiring the information (not raw meats but still over 800 across the different small companies) it was a big job and as stated an ongoing task.</td>
</tr>
<tr>
<td>As an SME has the cost of implementing nutritional labelling on your packaging been a burden on your</td>
<td>Lots</td>
<td></td>
<td>Yes</td>
<td>Extra work but deadline achieved.</td>
</tr>
<tr>
<td>Question</td>
<td>Yes</td>
<td>Definitely</td>
<td>Yes</td>
<td>Yes</td>
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<td>-----</td>
<td>------------</td>
<td>-----</td>
<td>-----</td>
</tr>
<tr>
<td>Has your company decided to use the voluntary nutritional information on front of pack? If so for what products?</td>
<td>yes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Has the 1.2mm minimum font size affected you with respect to fitting all your information on pack?</td>
<td>Considering</td>
<td>Not yet</td>
<td>No</td>
<td>Sandwich products.</td>
</tr>
<tr>
<td>Have you had to invest in new machinery due to FIC? If so please state what type of machinery.</td>
<td>I just about manage to fit everything on my current labels</td>
<td>no</td>
<td>Yes</td>
<td>No. No point in putting important info on a label if customer cannot read it.</td>
</tr>
<tr>
<td>Did you have a lot of packaging that you had to throw away due to FIC labelling?</td>
<td>yes, flatbed scales, 2 new sets of best before use by label guns, nutrimen software, new laptop to use the software</td>
<td>Dymo</td>
<td>Not as yet</td>
<td>no</td>
</tr>
<tr>
<td>Did you find FIC overall easy to implement and understand or was it quite difficult and often confusing?</td>
<td>no</td>
<td>Some</td>
<td>Yes</td>
<td>no</td>
</tr>
<tr>
<td>Has implementing FIC been a financial burden on your business?</td>
<td>the allergen info reasonably straight forward, nutritional info very difficult for small scale food producers who use seasonal products and like to offer specials (a seasonal special now involves a whole new analysis sheet and labels)</td>
<td>Confusing</td>
<td>As we know our product all is relatively simple however the fix has made it confusing</td>
<td>It was just a lot of new rules that had to be followed. A lot of work to implement, not hard to understand but some aspects were confusing because they were not clearly stated. eg nutrients in UK white bread flour, exempt from labelling previously (in flour and bread regulations), not mentioned in 2011/1169 so by their absence they had to be added. Difficult to search for something that is not there. A lot of the legislation seemed a little open to</td>
</tr>
<tr>
<td>Question</td>
<td>Answer 1</td>
<td>Answer 2</td>
<td>Interpretation. This was one that Trading standards could not answer at the time.</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>----------</td>
<td>---------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Did you feel you had enough time to implement FIC into your business?</td>
<td>yes</td>
<td>Yes. And might be the downful of many food artisan businesses. While the government tells us to eat healthy and fresh it seems that they prefer to encourage the public to buy from supermarkets as there is better labelling control but hardly any healthy advantage in regards to prepacked food.</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Did you feel you had enough time to implement FIC into your business?</td>
<td>yes</td>
<td>No</td>
<td>Yes and no</td>
<td></td>
</tr>
<tr>
<td>Overall how difficult did you find implementing FIC on your labelling?</td>
<td>somewhat difficult</td>
<td>Somewhat difficult</td>
<td>Neither easy nor difficult</td>
<td></td>
</tr>
<tr>
<td></td>
<td>somewhat difficult</td>
<td>Somewhat difficult</td>
<td>Neither easy nor difficult</td>
<td></td>
</tr>
<tr>
<td>ID numbers of participants</td>
<td>10</td>
<td>11</td>
<td>12</td>
<td>13</td>
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<tr>
<td>----------------------------</td>
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</tr>
<tr>
<td><strong>Questionnaire Questions</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>What sector of the food industry does your business fall under, e.g. Bakery, confectionary, meat etc.?</td>
<td>Dairy</td>
<td>Ice Cream</td>
<td>Ready Meals</td>
<td>Condiments</td>
</tr>
<tr>
<td>Do you sell pre-packed foods, non-packed foods or both?</td>
<td>Both pre-packed and No-pre packed foods</td>
<td>Both pre-packed and non pre-packed foods</td>
<td>Pre-packed foods</td>
<td>Pre-packed foods</td>
</tr>
<tr>
<td>The Regulation (EU) Food to Consumers (FIC) (1169/2011) was issued in 2011, for implementation in 2014 and nutritional analysis introduction to back of pack in 2016. What was the most difficult part of FIC to implement for your company?</td>
<td>Finding an authorised body or organisation to check our labels met all criteria before we initiated a print run on new packaging/labels.</td>
<td>Changing all of our packaging.</td>
<td>Amending pre-printed packaging</td>
<td>Nutritional Analysis</td>
</tr>
<tr>
<td>Why was this the most difficult part of the FIC to implement?</td>
<td>I tried to contacted our two local Trading Standards department for help in double-checking all of the details were correct. After much email-chasing, one department did eventually get back to me, but it was difficult and took half a dozen emails, two phone calls and 3 weeks of hassling to get some help. I had initially started this two months before the deadline.</td>
<td>Changing packaging is an expensive process. It is also Ensuring that the changeover from old to new stock coincided with changes to product specifications and customer requirements.</td>
<td>Firstly I guess obtaining the actual analysis results. A number of the ingredients used (mostly chillies) in our sauces are grown by us, and aren't commercially available (which is why we grow them). In order to accommodate this, we've had to use generic capsicum or red/green chilli as a default ingredient. However there are over 7000 varieties of chillies available, with five main families they are attributable to. The taste and heat profiles on these vary considerably, which would likely</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Industry bodies such as Campden BRI, Food Standards Agency etc.</td>
<td>Other Small Medium Enterprises, Colleagues, The internet, Customers, Suppliers, Consultants?</td>
<td>Consultants</td>
<td></td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------------------------</td>
<td>-------------</td>
<td></td>
</tr>
<tr>
<td>Who did you receive most guidance from?</td>
<td>The internet</td>
<td>The internet</td>
<td>Industry bodies such as Campden BRI, Food Standards Agency etc.</td>
<td></td>
</tr>
<tr>
<td>Which product did you find most difficult to implement FIC for?</td>
<td>We only have one product and it was only difficult (apart from the above answer) due to the fact that I had not done something like this before.</td>
<td>Small 120ml tub</td>
<td>None more difficult than others</td>
<td></td>
</tr>
<tr>
<td>What guidance did you use while implementing FIC?</td>
<td>Government website information and the Specialist Cheesemakers Association website.</td>
<td>Online - FSA website - and via our Trading Standards agent.</td>
<td>Food information regulations and information provided by Cardiff Metropolitan University and Trading Standards</td>
<td></td>
</tr>
<tr>
<td>How useful was the guidance you found?</td>
<td>Very useful</td>
<td>Very useful</td>
<td>Extremely useful</td>
<td></td>
</tr>
<tr>
<td>What was the reason behind you finding the guidance</td>
<td>It was fairly well laid out, but didn't give a simple example</td>
<td>It is just information that is necessary to follow.</td>
<td>The advice and guidance provided by Zero2Five was made</td>
<td></td>
</tr>
</tbody>
</table>

have some impact on their nutritional value, especially if the main ingredient in the product is chilli! We've also had to change our labelling as the size of our existing labels weren't big enough to accommodate the additional information required with the NI values.
<table>
<thead>
<tr>
<th>Question</th>
<th>Response</th>
<th>Additional Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>useful or not useful?</td>
<td>of a finished label, correct size, font, layout etc. Which would have been helpful.</td>
<td>up of a number of factors including labelling advice, allergens, Nutritional Information, pH and Water activity testing, and general consultation</td>
</tr>
<tr>
<td>What was the most useful piece of guidance you used and why?</td>
<td>Specialist Cheesemakers Association website, as it was tailored to our specific product.</td>
<td>All of it - it formed an integral part of our production</td>
</tr>
<tr>
<td>The nutritional back of pack labelling was implemented in December 2016. How did you feel as a business about this compulsory introduction of nutritional labelling on your products?</td>
<td>None</td>
<td>It's always a new set of unnecessary rules that impacts small businesses on both time and cost. We have no issues, as we provided the information prior to it becoming compulsory. I understand the importance of nutritional information on some products. However when considering some things, like condiments, especially some of the ranges we produce which are exceptionally hot the nutritional information is of very little relevance. Generally speaking we consider an average serving of most of our products to be a teaspoons worth, say 5ml. In most of our products the % of daily recommended value this accounts for is less than 1%. Some of our products are used in servings of less than 1ml, with almost negligible value ratings!</td>
</tr>
<tr>
<td>Have there been any problems with the introduction of the compulsory nutritional labelling?</td>
<td>None so far.</td>
<td>Packaging wastage, design issues.</td>
</tr>
<tr>
<td>Question</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>-----</td>
<td>------------------------------</td>
</tr>
<tr>
<td>As an SME has the cost of implementing nutritional labelling on your packaging been a burden on your business?</td>
<td>Increased working hours spent on the process</td>
<td>It has always been available</td>
</tr>
<tr>
<td>Has your company decided to use the voluntary nutritional information on front of pack? If so for what products?</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Has the 1.2mm minimum font size affected you with respect to fitting all your information on pack?</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Have you had to invest in new machinery due to FIC? If so please state what type of machinery.</td>
<td>No</td>
<td>No</td>
</tr>
<tr>
<td>Did you have a lot of packaging that you had to throw away due to FIC labelling?</td>
<td>Yes - labels</td>
<td>Yes</td>
</tr>
<tr>
<td>Did you find FIC overall easy to implement and understand or was it quite difficult and often confusing?</td>
<td>On occasion, difficult and confusing.</td>
<td>Quite tricky</td>
</tr>
<tr>
<td>Has implementing FIC been a financial burden on your business?</td>
<td>No comment.</td>
<td>Yes</td>
</tr>
<tr>
<td>Did you feel you had enough time to implement FIC into your business?</td>
<td>Yes</td>
<td>Yes</td>
</tr>
<tr>
<td>Overall how difficult did you find implementing FIC?</td>
<td>Somewhat difficult</td>
<td>Somewhat difficult</td>
</tr>
<tr>
<td>Questionnaire Questions</td>
<td>ID numbers of participant</td>
<td></td>
</tr>
<tr>
<td>-------------------------</td>
<td>---------------------------</td>
<td></td>
</tr>
<tr>
<td>What sector of the food industry does your business fall under, e.g. Bakery, confectionary, meat etc.?</td>
<td>14 Cheese &amp; Cheese Product Manufacturer Pre-packed Foods</td>
<td></td>
</tr>
<tr>
<td>Do you sell pre-packed foods, non-packed foods or both?</td>
<td>Actually getting the work done on time and keeping up with other legislative requirements for the same product</td>
<td></td>
</tr>
<tr>
<td>The Regulation (EU) Food to Consumers (FIC) (1169/2011) was issued in 2011, for implementation in 2014 and nutritional analysis introduction to back of pack in 2016. What was the most difficult part of FIC to implement for your company?</td>
<td>Because we were looking at current and new product at the same time so were flitting between new and old regs. Also, the variety of customers and product skus made for some confusion as current product recipes were being tweaked and therefore becoming new and looking at old labels - really confusing at the time</td>
<td></td>
</tr>
<tr>
<td>Why was this the most difficult part of the FIC to implement?</td>
<td>Industry bodies such as Campden BRI, Food Standards Agency etc.</td>
<td></td>
</tr>
<tr>
<td>Who did you receive most guidance from? Industry bodies such as Campden BRI, Food Standards Agency etc. Other Small Medium Enterprises, Colleagues, The internet, Customers, Suppliers, Consultants?</td>
<td>We do a multi component Cheese selection pack which contains 3 different products. The difficulty was in getting used to how this should look like on back of pack.</td>
<td></td>
</tr>
<tr>
<td>Which product did you find most difficult to implement FIC for? Why?</td>
<td>Campden guidance notes and conf calls with Campden personnel. Internet guidance notes / Google FIR Guidelines</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Response</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>What guidance did you use while implementing FIC?</td>
<td>Very useful</td>
<td></td>
</tr>
<tr>
<td>How useful was the guidance you found? Extremely useful, very useful, moderately useful, slightly useful or not at all useful?</td>
<td>Some of the guidance (depending where you looked) was a little contradictory which didn't help with new legislation. Campden seemed to be 'up' on the requirements so most of our questions were aimed in their direction</td>
<td></td>
</tr>
<tr>
<td>What was the reason behind you finding the guidance useful or not useful?</td>
<td>Campden training notes as they gave examples, references, pictorial examples. Cut down into different sections to make it easier</td>
<td></td>
</tr>
<tr>
<td>What was the most useful piece of guidance you used and why?</td>
<td>Not really bothered as we were currently doing compulsory nutritionals for the retailers</td>
<td></td>
</tr>
<tr>
<td>The nutritional back of pack labelling was implemented in December 2016. How did you feel as a business about this compulsory introduction of nutritional labelling on your products?</td>
<td>Only to sort out a little confusion how to lay out for different types of labels ie small labels / med labels, large labels etc. And, due to size of label the layout.</td>
<td></td>
</tr>
<tr>
<td>Have there been any problems with the introduction of the compulsory nutritional labelling?</td>
<td>Yes it was a burden because we are a SME and we had to absorb all of the redesign, plate and printing costs</td>
<td></td>
</tr>
<tr>
<td>As an SME has the cost of implementing nutritional labelling on your packaging been a burden on your business?</td>
<td>We do but from customer requests. All customer products have the info on front of pack however seasonal / Xmas depends on pack size, customer, customer category. We do not use for our own labelled product</td>
<td></td>
</tr>
<tr>
<td>Has your company decided to use the voluntary nutritional information on front of pack? If so for what products?</td>
<td>Yes especially on our smaller size packaged products - 150g Blended Cheese Portions &amp; 125g Goats Cheese Logs - other products also affected</td>
<td></td>
</tr>
<tr>
<td>Has the 1.2mm minimum font size affected you with respect to fitting all your information on pack?</td>
<td>No, new kit was bought for packing but not related to FIR / FIC</td>
<td></td>
</tr>
<tr>
<td>Have you had to invest in new machinery due to FIC? If so please state what type of machinery.</td>
<td>We had some packaging waste, but where possible it was run out prior to the actual date of changeover.</td>
<td></td>
</tr>
<tr>
<td>Did you have a lot of packaging that you had to throw away due to FIC labelling?</td>
<td>Overall it was ok, but time consuming as every product had to be amended. Staffing hours had to be increased to control all the packaging as not all was bought in at same time. Current product packaging had to be segregated and run out so that no packaging overlapped ie same product on shelf with 2 different sleeve / labels</td>
<td></td>
</tr>
<tr>
<td>Did you find FIC overall easy to implement and understand or was it quite difficult and often confusing?</td>
<td>Yes, as artwork had to be re done - cost 1, Printers had to make up new plates - cost 2, More staffing hours to control &amp; Segregate - Cost 3, Extra storage while old packaging being run out - Cost 4,</td>
<td></td>
</tr>
<tr>
<td>Question</td>
<td>Answer</td>
<td></td>
</tr>
<tr>
<td>-------------------------------------------------------------------------</td>
<td>------------------------------------------------------------------------</td>
<td></td>
</tr>
<tr>
<td>Has implementing FIC been a financial burden on your business?</td>
<td>Extra testing costs to comply with FIC / FIR - re correct nutritional information on pack - cost 5</td>
<td></td>
</tr>
<tr>
<td>Did you feel you had enough time to implement FIC into your business?</td>
<td>Yes</td>
<td></td>
</tr>
<tr>
<td>Overall how difficult did you find implementing FIC on your labelling?</td>
<td>Neither easy nor difficult</td>
<td></td>
</tr>
<tr>
<td>Extremely easy, somewhat easy, neither easy nor difficult, somewhat difficult, extremely difficult?</td>
<td>Cheese &amp; Cheese Product Manufacturer</td>
<td></td>
</tr>
<tr>
<td>Did you find FIC overall easy to implement and understand or was it quite difficult and often confusing?</td>
<td>Pre-packed Foods</td>
<td></td>
</tr>
<tr>
<td>Has implementing FIC been a financial burden on your business?</td>
<td>Actually getting the work done on time and keeping up with other legislative requirements for the same product</td>
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Appendix L – Themes and counts from Interview and Questionnaires with small/medium businesses (SMEs) when implementing the Food Information to Consumers (FIC) labelling requirements (Regulation (EU) 1169/2011)

<table>
<thead>
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<th>Count</th>
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<tr>
<td>Cost</td>
<td>30</td>
</tr>
<tr>
<td>Throwing away packaging</td>
<td>6</td>
</tr>
<tr>
<td>New machinery</td>
<td>2</td>
</tr>
<tr>
<td>100% certainty/lack of knowledge</td>
<td>8</td>
</tr>
<tr>
<td>Contradiction</td>
<td>2</td>
</tr>
<tr>
<td>New Business</td>
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</tr>
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<td>Example products to follow</td>
<td>3</td>
</tr>
<tr>
<td>Difficulty of nutritional</td>
<td>9</td>
</tr>
<tr>
<td>Time</td>
<td>7</td>
</tr>
<tr>
<td>Consumer importance</td>
<td>4</td>
</tr>
</tbody>
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Combined representative quotes from all data available on request.