

## Consultation on updates to Food Standards Scotland's Technical Guidance on food allergen labelling and information requirements

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(Link to consultation page: [https://consult.foodstandards.gov.scot/regulatory-policy/consultation-on-updates-to-the-food-standards-scot/#msdyntrid=lcY6SCP9r0vyAlwl\\_AOFIPP3MGQJKnKs-RggtF4ftBg](https://consult.foodstandards.gov.scot/regulatory-policy/consultation-on-updates-to-the-food-standards-scot/#msdyntrid=lcY6SCP9r0vyAlwl_AOFIPP3MGQJKnKs-RggtF4ftBg))

31<sup>st</sup> August 2023

To whom it may concern,

### Food Standards Scotland

#### Updates to Technical Guidance on food allergen labelling and information requirements

The Scottish Grocers' Federation (SGF) is a trade association for the Scottish Convenience store sector. There are 5,098 convenience stores in Scotland, which includes all the major symbol groups, co-ops and convenience multiples in Scotland. SGF promotes responsible community retailing and works with key stakeholders to encourage a greater understanding of the contribution convenience retailers make to Scotland's communities. In addition, Convenience stores are known to be economic multipliers and an important source of local employment, providing over 49,000 jobs in Scotland ([Scottish Local Shop Report 2022](#) (SLSR22)).

Convenience stores trade across all locations in Scotland, providing a core grocery offer and expanding range of services in response to changing consumer demands close to where people live. According to our Scottish Local Shop Report 2021 (SLSR21), local convenience stores offer the following fresh food related services: 45% customer operated coffee machine, 34% in-store bakery, 27% hot food counter or cabinet, 25% food preparation area/kitchen, 19% serve over the counter coffee, 18% food-to-go concession and 14% have an in-store microwave for customer use.

Meanwhile, our Scottish Local Shop Report 2022 highlights that ,as a percentage of overall market sales, Bread & Bakery represents approximately 4.8%, Sandwiches & Wraps 1.3% and Fruit & Veg 3.7%. These are among some of the many products and services provided in-store.

With the UK convenience sector expected to grow to £48.6bn by 2025, the sector is more relevant than ever to every type of customer and has key social benefits and is of key economic value to the economy. Over the past year, the UK convenience sector contributed over £9.7bn in GVA and over £9bn in taxes (SLSR22).

## Consultation

SGF welcomes the opportunity to respond to Food Standards Scotland's consultation on *Updates to Technical Guidance - food allergen labelling and information requirements*.

SGF has previously welcomed the requirement for prepacked for direct sale (PPDS) food labelling, which came into force on 1st October 2021. We are also grateful for the support of Food Standards Scotland in the production of our [Retailer Guide: New Labelling Requirements for Food Sold Prepacked for Direct Sale](#), published in July 2021.

SGF also offered and continues to offer online support and advice on labelling through our [Get Labelled](#) website, developed prior to the changes brought forward in 2021.

One of the key aims of SGF is to promote responsible community retailing and both the guide and the website are very much in line with that aim. Enabling retailers to fully understand and be fully compliant with the regulations. In addition to helping to protect consumers by providing potentially life-saving allergen information on the packaging.

### Consultation Questions:

***Are you in favour of the proposed updates to the Allergen Labelling Technical Guidance relating to the use of Precautionary Allergen Labelling (PAL) statements?***

Yes.

SGF is content with the suggested updates to the PAL statements. We understand that these updates are intended to provide accurate information for consumers and reduce any ambiguity in the present guidance.

However, we note that many convenience retailers in Scotland are facing an extremely challenging trading environment. Alongside soaring energy costs, rising inflation and interest rates and the cost-of-living crisis. Having a significant impact on customers, footfall, and household budgets. Around 11% of convenience retailers working more than 70 hours per week and 28% taking no holidays throughout the year (SLSR 2022).

Therefore, it is essential that changes to the PAL guidance are implemented in such a way to minimise any disruption to retailers and food business operators. There should be a reasonable period of grace and flexibility within the guidance, allowing businesses to comply to the updated requirements without falling foul of the regulations.

Likewise, SGF would appreciate a thorough period of sector engagement and awareness raising to ensure all convenience stores are fully informed. With this in mind, SGF would welcome the opportunity to share any public messaging from FSS via our regular members communication and social media platforms.

***Are you in favour of the proposed updates to the Allergen Labelling Technical Guidance relating to the use of No Gluten Containing Ingredients (NGCI) statements?***

Yes.

SGF is also satisfied with the suggested updates to the NGCI statements, for similar reasons to those set out above.

***Any further comments regarding any other aspects of the guidance document.***

Please see above for additional comments on SGF's perspective on the implementation of the changes to the Technical Guidance.

We trust that you will find our comments helpful and are happy to engage further with you on this important matter.

Yours sincerely,

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- SGF gives permission to the Food Standards Scotland to publish its consultation response and to share this response internally with other policy departments, that may be addressing the issues discussed.
- SGF is also content to be contacted again in the future, in relation to this consultation exercise.