Clarification Memo on Food Safety Concerns Relating to Date Label Call to Action

WHAT DOES THE CALL TO ACTION ENDORSE, AND WHAT IS THE INTENT?

The Consumer Goods Forum (CGF) Call to Action calls for a shift to standardized date labels by 2020, using a three-pronged approach:

- **Two date label options** – one option for perishable items and the other for non-perishable items
- **One date at a time** – only one date should be visible in written format on a food product
- **Consumer education** – retailers, manufacturers, government agencies and others work to educate consumers on what the labels denote

Confusion over date labels accounts for approximately 20 percent of consumer food waste in the United Kingdom (the only country with data available). This Call is intended to reduce consumer confusion over labels, and thus reduce food waste and save money for the consumer.

WHAT DO EACH OF THE DATE LABELS MEAN, AND WHEN ARE THEY USED?

The Call to Action suggests two types of labels.

One would be for the few items that are perishable (the phrasing used by the Food Marketing Institute (FMI) and Grocery Manufacturers Association (GMA) is “highly perishable and/or present a food safety concern over time”). An example phrase for this label could be “USE by,” although the exact wording should be tailored for what makes sense in the local context.

The other would be for non-perishable items and would denote the quality of the product. An example phrase for this label could be “BEST IF USED by,” but this also should be tailored for the local context. For the FMI/GMA date label announcement in the United States, the organizations conducted repeated focus group tests to determine the most appropriate phrases.
WHAT ARE THE FOOD SAFETY IMPLICATIONS?
This solution fully recognizes the paramount importance of food safety concerns, and seeks to reduce confusion and make sure consumers understand the intention of food labels. This Call to Action does not suggest altering dating methods currently relating to food safety (e.g., determining longevity of a food product before expiry), and does not make a recommendation about what would be considered a perishable product.

IS THE CGF CALL TO ACTION IMPLYING CERTAIN FOODS ARE INHERENTLY UNSAFE PAST A CERTAIN DATE?
No. The intent is to simplify date labels for consumers so that they are better informed about what the label means and reduce the likelihood food is discarded prematurely.

WHAT ARE PERISHABLE PRODUCTS?
According to FMI/GMA, perishable products are those with a potential food safety implication over time. According to the FMI/GMA’s FAQs, after the date on the “USE by” label has passed, the product should not be used or consumed and instead should be discarded.

DOES THIS MEAN ALL PRODUCTS HAVE TO BE LABELED?
No. Dates are currently printed on many food items but not on all products (e.g., salt). This Call to Action does not suggest whether a manufacturer should start or stop using a date on a product.

HAS THIS LABELING SYSTEM WORKED ELSEWHERE?
Yes. Similar systems are currently being implemented in the United States, Japan, and the United Kingdom with engagement by food safety regulators.

WILL IT CONFLICT WITH LOCAL REGULATIONS?
No. Some countries may have regulations requiring specific language on certain products. These regulations will still need to be followed. But the approach of the Call to Action is broadly applicable in most contexts. Current global guidelines from FAO Codex Alimentarius do not preclude food manufacturers from implementing this Call to Action.