

Product Safety Unit

## Guidelines on withdrawal due to labelling error

---

### Guidelines on withdrawal due to labelling error

General principles for the withdrawal of foodstuffs from the market are presented in the withdrawal guide published by Finnish Food Safety Authority Evira

[http://www.evira.fi/portal/en/food/manufacture\\_and\\_sales/guidelines\\_on\\_withdrawal\\_of\\_products/](http://www.evira.fi/portal/en/food/manufacture_and_sales/guidelines_on_withdrawal_of_products/)

The omission of allergenic ingredients from the label (Decree 1084/2004 of the Ministry of Trade and Industry on the Labelling of Foodstuffs, Amendment 1224/2007, Section 23 and Annex 3) will always result in withdrawal. Separate guidelines have been drawn up for such withdrawal: Instructions for withdrawal due to allergen error [http://www.evira.fi/attachments/english/food/control\\_and\\_entrepreneurs/guidelines\\_on\\_withdrawal\\_of\\_products/ohje\\_allergeenivirhe\\_eng2.pdf](http://www.evira.fi/attachments/english/food/control_and_entrepreneurs/guidelines_on_withdrawal_of_products/ohje_allergeenivirhe_eng2.pdf)

Evira finds that as concerns other, general labelling information, the consumers are also in the following cases provided with insufficient information to make choices that are safe to their health:

1. the package bears no labelling information at all
2. the labelling is not in Finnish and Swedish (or Norwegian/Danish)
3. the list of ingredients is missing from the package (in cases where it is compulsory \*)
4. all the ingredients are not indicated (taking into account the derogations granted for indication of ingredients\*\*)

In these cases the operator shall initiate procedures to withdraw the foodstuff from the market in accordance with the withdrawal guide referred to above.

The operator shall initiate withdrawal action also due to other labelling errors, if the risk assessment conducted by the operator shows that food safety may be jeopardised (e.g. warnings/instructions for use are missing, or a date marking is missing or false) or the consumers are essentially misled by the labelling.

\* derogations Decree 1084/2004, Section 9, Section 40, articles 3 - 5

\*\* Decree 1084/2004, Sections 9, 10, 12 and 15