CRITERIA FOR THE USE OF THE TERMS FRESH, PURE, NATURAL ETC IN FOOD LABELLING
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INTRODUCTION

1. The Food Standards Agency is committed to promoting informed choice. Improving food labelling is one of our priority objectives.

2. Consumers are concerned about the way some descriptions on labels have lost their true meaning. This conclusion has emerged from consumer research, public consultations and correspondence.

3. Our aims in producing this advice on use of these terms are to help:
   - manufacturers, producers, retailers and caterers to decide when these descriptions could be used and when they should not
   - enforcement authorities to challenge inappropriate uses
   - consumers, by encouraging the adoption of consistent, transparent labelling practices.

4. This advice should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. Ultimately, only the courts can decide whether, in particular circumstances, an offence has been committed.

BACKGROUND:

5. The Agency invited the Food Advisory Committee (FAC) to investigate the use of a number of terms and advise how misuse might be avoided. These terms were:

   - Fresh
   - Natural
   - Pure
   - Traditional
   - Original
   - Authentic
   - Home-made
   - Farmhouse

6. The FAC concluded\(^1\) that the basic requirements of the Food Safety Act 1990, the Trade Descriptions Act 1968 and the Food Labelling Regulations 1996 were sufficient in principle to ensure that consumers are not misled in this area of claims.

7. However, the FAC also found that these terms were being misused in some cases, and that there was clear room for improvement. It felt that use had in some cases become far-removed from generally accepted meanings and had the potential to mislead consumers, even after making due allowance for changes to the accepted meaning and use of words over time. The Committee made a number of recommendations, which have been taken as the basis for this advice.

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\(^{1}\) “FAC Review of the use of the terms Fresh, Pure, Natural etc in Food Labelling 2001” – FSA/0334/0701.
RELEVANT LEGISLATION

8. This advice relates to, and should be read in conjunction with, the provisions of

- **Article 16 of Regulation (EC) No 178/2002** (on the general principles and requirements of food law)
  
  this requires that the labelling, advertising and presentation of food, and the information made available about it through whatever medium, should not mislead consumers

- **Article 2 of Directive 2000/13/EC** (on food labelling)
  
  this requires that the labelling, advertising and presentation of a food must not be such as could mislead a purchaser to a material degree, particularly
  - as to the characteristics of the food and, in particular, as to its nature, identity, properties, composition, quantity, durability, origin or provenance, method of manufacture or production;
  - by attributing to the food effects or properties that it does not possess;
  - by suggesting the food possesses special characteristics when in fact all similar foods possess such characteristics

- **the Food Safety Act 1990**
  
  this prohibits the sale of any food that is not of the nature, substance or quality demanded by the purchaser; and makes it an offence to describe, present or advertise food in a way that is false or likely to mislead the consumer

- **the Trade Descriptions Act 1968**
  
  this makes it an offence to apply a false trade description to any goods, including specific information on quantity, size and composition, how they were made and by whom

- **the general provisions of the Food Labelling Regulations 1996**

GENERAL ADVICE

9. This advice applies equally to all food, regardless of whether it is prepacked or not, and regardless of the type of outlet from which it is sold.

10. General labelling principles are applicable to the use of all the terms covered by this advice. As with all other aspects of claims
foods should be sold without deceit and should be so labelled and advertised as to enable a prospective purchaser to make a fair and informed choice, based on clear and informative labelling;

- a food must be able to fulfil the claim being made for it and adequate information must be available to show that the claim is justified;
- where a claim is potentially ambiguous or imprecise, the likely understanding of an average consumer should prevail;
- controls should protect both consumers and honest traders;
- controls should allow fair comparison and competition between products, sectors and traders;
- if consumer and trader interests conflict, the interests of consumers must take precedence.

11. Pictures on labels and in advertisements have a powerful effect on prospective purchasers and, in some product sectors, may have a greater significance than names and other descriptive material. Pictorial representations should be subject to the same scrutiny and control as the words used to portray similar images and concepts. Care should be taken to ensure that background illustrations and pictorial material do not mislead the consumer as to the type, quality or origin of the product. For example

- country scenes may lead a consumer to believe that animal products have been obtained from extensively reared, free-range animals;
- kitchen scenes may lead a consumer to believe a product is hand-made or at least produced in a small-scale operation.

12. The labelling and presentation of the food as a whole should be used in assessing whether a particular label or description is likely to be considered misleading. Where a consumer might be misled by pictorial representations, any potential ambiguity must be clarified by equally clear and prominent labelling.

13. Any use of the terms covered by this advice must be capable of technical substantiation. Where there is any doubt over the likely interpretation of the phrase or description being used, the most likely interpretation of a typical consumer should prevail.

14. Notwithstanding the various potential meanings of these terms in the different contexts in which they are used, it should always be clear in each case what characteristic of a product is being described.

15. It is not helpful to use “style” or “type” to qualify the terms covered by this advice (eg “traditional style”).
16. The description “fresh” can be helpful to consumers where it differentiates produce that is sold within a short time after production or harvesting. However, modern distribution and storage methods can significantly retard the effects of this lapse of time, and it has become increasingly difficult to decide when the term is being used legitimately.

17. The term can also be helpful when used to identify products that have not been processed. In these cases it is important to be clear what is meant by processing: excluding the use of chill temperatures and other controlled atmospheres for the delayed ripening and/or extended storage of fruit and vegetables or washing and trimming would seem unnecessarily restrictive.

18. “Fresh” is often used in a number of phrases that may have an emotive appeal but no real meaning (eg “oven fresh”, “garden fresh”, “ocean fresh”, “kitchen fresh”, etc).

General:

19. The use of the term “fresh” in some specific circumstances is sanctioned in law (eg “Traditional Farmfresh Turkey”, “extra fresh” eggs and “fresh” poultry).

20. Otherwise, the term “fresh” should only be used where it has a clear meaning. The description can help consumers differentiate between similar products, for example:

- fresh fruit salad that is made only from fresh fruit
- fresh dairy products (such as cream) held under chilled conditions at point of sale, with limited shelf life, even where these have been subjected to a minimal, mild heat treatment such as conventional pasteurisation for safety purposes

21. The meaning of the terms “fresh” or “freshly” must be clear whenever they are used, whether alone or qualified by other terms. The use of emotive but basically meaningless terms like “ocean fresh”, “kitchen fresh”, “garden fresh” etc should be avoided.

22. Expressions like “freshly cooked”, “freshly prepared”, “freshly baked”, “freshly picked” can have no other connotation than the immediacy of the action being described. Where such expressions are used, it is recommended they be accompanied by an indication (eg of the date or

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3 Council Regulation (EEC) No 2771/75 on the common organisation of the market in eggs, as amended
4 Commission Regulation (EEC) No 1538/91 on certain marketing standards for poultry, as amended
time or period – “freshly prepared this morning”) of when the action being described took place.

23. Packaging, storage and other supply chain processes that control “freshness” should not be described in terms that may imply that only a short period after harvesting or preparation has elapsed before sale if this is not the case. For example, a food that has been vacuum packed to retain its freshness should not be described as “freshly packed”.

**Fruit and vegetables:**

24. The term “fresh” is now used generically to indicate that fruit and vegetables have not been processed, rather than that they have been recently harvested, and is acceptable provided it is not used in such a way as to imply the product has been recently harvested (eg “fresh from the farm”; “freshly picked”) if this is not the case (see paragraph 22 above).

25. The term “fresh” may be used to describe fruit and vegetables that have been washed and/or trimmed, provided the fact they have been washed and/or trimmed is also indicated.

**Meat and fish:**

26. Virtually all carcase meat is chilled to near or just below 0°C following slaughter, principally as a hygiene measure. The term “fresh” is traditionally used to differentiate raw meat from that which has been (chemically) preserved. It would serve no purpose to disqualify chilled meat from use of the term “fresh”. Use of the term “fresh” in these circumstances is acceptable.

27. Use of the term “fresh” to describe fish that has been kept chilled on ice, but not deep frozen, is acceptable.

28. Meat or fish that has been previously frozen but which is sold thawed would not be considered by the average consumer to be “fresh”. The term “fresh” should not be used in these circumstances.

**Fruit juice:**

29. The term “fresh” should not be used, directly or by implication, on juices prepared by dilution of concentrates.

30. The term “freshly squeezed” should only be used to describe juice obtained direct from the fruit (ie not prepared from concentrates) where there has been a short time between extraction and packaging and the “use by” date given on the product is within 2 weeks of juice extraction.

31. Where fruit juice described as “freshly squeezed” has been pasteurised, the indication of treatment should form part of the claim, eg “freshly squeezed pasteurised orange juice” etc.
Fresh pasta:

32. Fresh pasta is traditionally considered as a short shelf life product and it is unlikely that the term “fresh” for long shelf life products would equate with the average consumers’ perception of the term.\(^5\)

Fresh bread:

33. Terms such as “freshly baked”, “baked in store” and “oven fresh” may mislead consumers into believing that they are being offered products that have been freshly produced on site from basic raw materials. Some stores sell bread made from part-baked products that have been packed in an inert atmosphere or frozen off-site then “baked off” at in-store bakeries. Use of terms like “freshly baked”, “baked in store” and “oven fresh” on these products could potentially infringe the general provisions described in paragraph 8 above.\(^6\)

Frozen foods/ingredients:

34. The term “fresh” should only be used in relation to frozen foods if its use is clear from the context. For example

- “frozen from fresh” should only be used to indicate a food was fresh (ie recently made or harvested) when it underwent freezing;
- “made with fresh ingredients” should be used only where the intended meaning is that no processed ingredients (ie ingredients that have been dried, freeze-dried, frozen, concentrated, powdered, smoked, tinned, etc) were used;
- “made with fresh X” should only be used where X is the name of an ingredient that has not been processed and the food does not also contain processed equivalents of the same ingredient. For example, a food described as “made with fresh tomatoes” should not also contain tinned tomatoes.

Fresh taste:

35. The expression “fresh taste” should not be used where it could mislead the consumer, for example by implying “freshly squeezed”, unless it is clear from the context that the reference is to the “tanginess” of the taste or if the appropriate criteria for “freshness” are met. The use of alternative terms like “clean taste” and “refreshing taste” should be considered.

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\(^5\) LACORS circular LAC 14 96 7: “Fresh pasta”

\(^6\) see also LACORS circular LAC 9 98 9: “Labelling and description of bread”
36. Terms like “with the taste of fresh X” (eg “with the taste of fresh lemons”) should only be used if the product contains “fresh X” and the flavour being described comes wholly or mainly from that “fresh X”.

**Chilled foods:**

37. The increased sales of chilled convenience foods has led to the use of the term “fresh” to indicate a moderate life under refrigerated conditions and to highlight the difference from conventional long-life products. Examples include chilled soups and sauces with the taste and texture characteristics of less heavily processed, canned or bottled items; and fruit juice produced directly from the fruit, perhaps pasteurised. In these cases, the products have a short shelf life, even under chilled storage, and it is claimed that the term is applied to indicate this fact to the consumer.

38. There are more precise ways to indicate the necessary storage conditions. The term “fresh” should not be used in this manner unless the product complies with the appropriate criteria for its use, as set out in this advice.
“Natural” means essentially that the product is comprised of natural ingredients, e.g. ingredients produced by nature, not the work of man or interfered with by man. It is misleading to use the term to describe foods or ingredients that employ chemicals to change their composition or comprise the products of new technologies, including additives and flavourings that are the product of the chemical industry or extracted by chemical processes.

Dairy products:

40. The term “natural” has been used on certain dairy products for many years, to signify that the products are manufactured only from milk, using only the necessary, associated fermentation cultures and are free from other ingredients or additives, such as preservatives, flavourings, colours, i.e., they are “plain”, unflavoured products, (eg “natural” yogurt, “natural” fromage frais, and “natural” cottage cheese). This usage is well understood, and is therefore acceptable, providing it is clear that the term is indicating that the flavour of the product is that derived solely from the ingredients essential to the manufacture of the product, and that the flavour has not been adjusted by any other means. The ingredients must comply with the requirements in 44 and 45.

Bottled water:

41. The term “natural” may be used to describe mineral water in accordance with the Natural Mineral Water, Spring Water and Bottled Drinking Water Regulations 1999. Other product names for bottled water are “spring water” and “bottled drinking water”.

General:

42. The term “natural” without qualification should be used only in the following cases:

a) To describe single foods, of a traditional nature, to which nothing has been added and which have been subjected only to such processing as to render them suitable for human consumption:

   • smoking (without chemicals), traditional cooking processes such as baking, roasting or blanching and traditional methods of dehydration are examples of processes that are acceptable, as are physical sieving and washing with water.

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7 implementing Directives 80/777/EEC, as amended, and 80/778/EEC
• fermentation is itself a natural process but subsequent processes may disqualify the final product from the description “natural” unless appropriately qualified.

• processes such as freezing, concentration, pasteurisation, and sterilisation, whilst clearly playing a significant role in both making food safe and preserving it do not accord with current consumer expectations of “natural” foods. However, the process to which a “natural” product has been subjected can be described using these terms (e.g. “pasteurised natural lemon juice”, “frozen natural orange juice”).

• for single ingredient foods such as cheese, yoghurt and butter, acceptable processing is that which is strictly necessary to produce the final product (as described in paragraph 40 above, and 44 and 45 below.

Bleaching, oxidation, smoking (with chemicals), tenderising (with chemicals), hydrogenation and similar processes fall outside the scope.

The restriction to “foods of a traditional nature” excludes from the concept of “naturalness” foods derived from novel processes.

b) To describe food ingredients obtained from recognised food sources and which meet the criteria in a).

c) To describe permitted food additives obtained from recognised food sources by appropriate physical processing (including distillation and solvent extraction) or traditional food preparation processes.

d) To describe flavourings when in conformity with the UK Flavourings in Food Regulations 1992, as amended, and EC Directives 91/71/EEC and 2000/13/EC (Annex III).

e) To describe preserved tuna and bonito when in conformity with EC Regulation 1536/92.

43. Compound foods should not themselves be described directly or by implication as “natural”, but it is acceptable to describe such foods as “made from natural ingredients” if all the ingredients meet the criteria in paragraph 42b), c) and d), as appropriate.

44. A food that does not meet the criteria in paragraphs 42a) or 43 should not be claimed to have a “natural” taste, flavour or colour.

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8 European flavourings legislation requires flavouring manufactures and suppliers to use the terms “natural”, “identical to nature” and “artificial” for commercial sales of their products. However, consumers may not differentiate between the concepts of “artificial” and “identical to nature” (or “nature-identical”) when used to describe those ingredients in relation to the final food.
45. “Natural” meaning no more than plain or unflavoured should not be used unless the food meets the criteria in paragraphs 42a) or 43, or is in accordance with the Dairy Industry Federation Code of Practice for the Composition and Labelling of Yogurt.

46. “Natural”, or its derivatives, should not be included in brand or fancy names, nor in coined phrases, in such a way as to imply that a food that does not meet the criteria in paragraphs 42a) or 43 is natural or made from natural ingredients.

47. Where the word “natural” forms part of a company name, no undue prominence should be given to the word on any individual product unless that product meets the requirements of these criteria.

48. Claims such as “natural goodness”, “naturally better”, or “nature’s way” are largely meaningless and should not be used.

49. The principles set out above also apply to the use of other words or expressions, such as “real”, “genuine”, “pure” etc with separate and distinctive meanings of their own, when used in place of “natural” in such a way as to imply similar benefits. Guidance on such terms and their synonyms is offered elsewhere in these advice notes.

50. Other claims (which might be termed “negative claims”) that do not use the term “natural” or its derivatives directly, but the effect of which is to imply “naturalness” to the consumer, are potentially misleading and confusing. The following should not be used:

- a claim that a food is “free from x”, if all foods in the same class or category are free from “x”;
- statements or implications which give undue emphasis to the fact that a product is “free from certain non-natural additives or categories of additives”, when the product contains other non-natural additives;
- a claim that a food is “free from one category of additive”, when an ingredient or an additive of another category having broadly similar effect has been used.

These criteria do not affect “negative claims” which do not imply “naturalness” to the consumer, (such as “free from x”, where “x” is a particular additive), and where the statement may provide consumers with accurate and beneficial information.
RECOMMENDED CRITERIA FOR THE USE OF THE TERM “PURE”

51. The term “pure” is mostly used on single ingredient foods (eg to indicate a single, named variety of rice) or to highlight the quality of ingredients of a food (eg “pure butter shortbread” to indicate the butter has not been blended with other fats).

52. The validity of the use of the term “pure” should be determined by the properties of the food itself, not its storage conditions.

53. The term “pure” should generally only be used in the following circumstances.

a) To describe a single ingredient food:
   - to which nothing has been added;
   - that is free from adventitious contamination by similar foods (ie tolerances for contamination such as for basmati rice, durum pasta, GM thresholds, etc should not apply);

b) Compound foods should not generally be described, directly or by implication, as “pure”. It is, however, acceptable to describe such foods as “made with pure ingredients”, if all the ingredients meet the criteria above, or if a claimed, named ingredient meets these criteria and is the only source of that ingredient. There are two exceptions to this general rule:
   - Fruit juice: “pure” is used only for non-sweetened fruit juice but may be used for concentrated juice reconstituted with water. Legislation permits the addition of sugar or citric acid to correct sweetness and the use of ascorbic acid as an antioxidant during processing of fruit juices. The term “pure” should not be used on those products containing added sugar, citric acid or ascorbic acid.
   - Jams and marmalades: the term “pure fruit” is used to indicate that the fruit has not been preserved by sulphur dioxide, prior to use in the jam/marmalade. This usage is acceptable. The European Court of Justice has ruled that the expression “naturally pure” is legitimate, and unlikely to mislead consumers when used on a strawberry jam made with added pectin and containing low levels of lead, cadmium and two particular pesticides. In summary, the Court took the view that the presence of pectin was readily apparent to the average consumer by virtue of its declaration in the ingredient list; the presence of low levels of naturally-occurring contaminants was unavoidable; and the levels of the pesticide

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9 ECJ Case C-465/98 Handel und Gewerbe Koln eV v Adolf Darbo AG
residues were “particularly low” as compared with the levels permitted by Community legislation.

54. “Pure” should not be included in any brand or fancy names, nor in coined or meaningless phrases, in such a way as to imply that a food that does not meet the criteria above is pure or made from pure ingredients.

55. “Pure” meaning no more than plain or unflavoured should not be used except where the food in question meets the criteria above.
RECOMMENDED CRITERIA FOR THE USE OF THE TERM “TRADITIONAL”

56. The term “traditional” is widely used to describe a product or method of preparation when newer alternatives are available on the market. It implies more than “original” or “plain”.

57. Unless the term forms part of a name that has been registered under European rules (eg “Traditional Farmfresh Turkey”\(^\text{10}\)), the term “traditional” should demonstrably be used to describe a recipe, fundamental formulation or processing method for a product that has existed for a significant period\(^\text{11}\). The ingredients and process\(^\text{12}\) used should have been available, substantially unchanged, for that same period.

58. It is misleading to use the term “traditional”, without qualification, simply to distinguish an “original” recipe from subsequent variants. Manufacturers and retailers should pay particular attention to the use of ingredients, particularly additives, and to the use of processes that have not been used in food manufacture for the significant period of time indicated above. They must ensure that the term does not imply a composition or production method that would not be regarded as “traditional” by the average consumer and should consider whether the term “original recipe” or similar expression may be more appropriate. There should be evidence to substantiate the use of the word for the particular product.

59. Recipes of what might be described as “traditional” products may change over time to accommodate consumer demands and expectations (eg Christmas puddings and mince pies made with vegetable rather than animal fat/suet; and other foods that are traditionally consumed at certain times of the year). Such foods should not be described as “traditional X”. However, reference may be made to the traditional nature of these products, provided this does not imply that the product itself has been made traditionally/to a traditional recipe unless this is the case. For example - “Christmas pudding – a rich, steamed fruit pudding traditionally eaten on Christmas day with custard, brandy butter or cream”.


\(^{11}\) As a general rule, this should be taken to be of the order of 2 generations/50 years

\(^{12}\) The Chorleywood Bread Process has been used in bread production in the UK for nearly 40 years. It constitutes no more than the mixing of dough under pressure/vacuum and should not obviate the ability of bakers to call a loaf “traditional” when in other respects the loaf remains unaltered.
60. Unlike “traditional” the term “original” does not imply, necessarily, that a product has remained unchanged for a substantial period of time. It is used to indicate that a product was the first of its type to be placed on the market, where the original form or flavour has remained essentially unchanged through the passage of time and hence to differentiate it from new additions to a range. The term is commonly used to convey “plain” or “unflavoured” where other variants are offered (e.g., “original flavour crisps”) or to indicate the first variant in a series of products.

61. The term “original” should only be used to describe a food that is made to a formulation, the origin of which can be traced, and that has remained essentially unchanged over time. It can similarly be used to describe a process, provided it is the process first used in the making of the food, and which has remained essentially unchanged over time.

62. To be termed “original”, a product should not have changed to any material degree and should remain available as the “standard” product when new variants are introduced. A product re-introduced onto the market after a period of absence should only be described as “original” if it can be shown to meet these criteria.

63. The term “original” should not be used to convey “plain” or “unflavoured” where other variants are offered (e.g., original flavour crisps), or to indicate the first variant in a series of products, unless the product can be shown to meet the criteria in paragraphs 61 and 62.
RECOMMENDED CRITERIA FOR THE USE OF THE TERM “AUTHENTIC”

64. The term “authentic” has a stronger meaning than “traditional”. It may imply either that a product has remained unchanged through the passage of time, or that it actually originates from the area implied by its name (e.g. authentic Cornish pasties) when the generic description of the product has passed into wider usage.

65. The term “authentic” is used

- to indicate the true origin of a product where the description may be in wider, generic use

- to convey to consumers that a product has particular characteristics that have not been adjusted for the British palate (e.g. authentic Indian-recipe curry dishes)

- to indicate single types of rice, where this is important because they have particular characteristics.

66. The current, widespread use of terms such as “real”, “genuine” etc in relation to individual food ingredients (e.g. “made with real fruit juice”) is largely unjustified and tautological. Such use may be taken to imply that the food or its ingredients possess higher compositional quality than others in the same class. In view of the fact that food or ingredients that are analogue or substitute, or a flavouring, should already be clearly indicated on the label, it is recommended that this use of these terms should be discontinued.

67. The term “authentic” and related terms like “real” and “genuine” should only be used in the following circumstances

- to emphasise the geographic origin of a product, for example where it might be confused with other products of the same name that do not originate from that location, e.g. “authentic Devon toffees”;

- to describe the recipe used to make a product, the origin of which is specified, e.g. “authentic Indian recipe curry”;

- to emphasise the purity of single varieties of ingredients where such purity is essential to deliver specific characteristics.

68. “Authentic” and analogous terms should not otherwise be used, without qualification, to describe either a food or an ingredient.
69. “Home-made” is a term defined very simply and specifically in dictionaries:

- made or prepared in the home; of domestic manufacture;
- made at home using traditional methods rather than by a manufacturer;
- made by oneself;
- crudely or simply made.

70. Consumers understand the term “home-made” to mean food prepared in a domestic kitchen rather than in a factory or a manufacturer’s kitchen. The use of the term, if unqualified, should accordingly be restricted to the broad criteria above.

71. In order to avoid visual misrepresentation, factory-made foods should not be shown being made in small kitchens, farmhouses etc.

72. In order to accommodate the production of meals and dishes on commercial catering premises, the term “home-made” should be restricted to the preparation of the recipe on the premises, from primary ingredients, in a way that reflects a typical domestic situation. This should not be achieved simply by the assembly of wholly pre-prepared elements, or simple reconstitution from dry base mixes, but must involve some degree of fundamental culinary preparation. As in domestic preparation, it would be legitimate for caterers to use partly-prepared ingredients; typical examples could include the use of pre-prepared raw pastry, bakery bread in desserts or stock cubes in sauces.
73. The use of terms like “country”, “farm” etc or similar visual depictions of typical rural scenes may mislead if the food to which they are applied has not been produced on what the average consumer would understand to be a farm.

74. “Farm House” or “farmhouse” can only be defined as a house on a farm, and more specifically as the main dwelling of the farmer himself.

75. The baking industry has long used the term “farmhouse” to describe a style of bread with a single, longitudinal split and sometimes flour dressed. This use of the term is acceptable.

76. Where the term “farmhouse” is used in connection with foodstuffs other than bread, it should refer to that produced on a farm. If it is not produced on a farm but is produced to the same quality and style as that likely to be produced on a farm, it should be described accordingly.

77. Given the vagueness of the term when used alone, its use should be avoided in preference of other terms which may be more descriptive and more accurate (eg “chunky vegetable soup”). When the term is used, its meaning should be made clear either within the context of sale or by associated wording (eg “farmhouse-made soup”).

78. Simply describing an ingredient as “farmhouse”, e.g. “x with farmhouse vegetables”, is meaningless. The term should not be used in this context.

79. The similar expression “country style” does not appear to have any specific meaning. This phrase should not be used to describe any food or food ingredient.
80. The address for all correspondence relating to the issues set out in this advice is:

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81. For further information on the legislation in the devolved administrations, please contact

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