

RETAILERS: WHAT YOU NEED TO KNOW ABOUT REFILLS

Offering a refill station is a fantastic way to help you and your customers reduce single-use plastic and costs. This short overview is a guide to assist in some of the regulatory labelling requirements. This is a rapidly changing environment and we recommend that you keep checking for the release of any new government documentation or updates on legislation.

FOOD DISPENSERS AND REFILLS

LABELLING

When you sell loose foods, you need to tell your customers:

- The name of the food
- Whether the food contains, or may be cross contaminated by any [allergens](#).

Currently, this list includes 14 allergens including peanuts, nuts, sesame, eggs, milk, soya, gluten, celery, mustard, lupin, sulphite, fish, shellfish, molluscs, but it's essential to check the latest advice at <https://www.food.gov.uk/business-guidance/allergen-labelling-for-food-manufacturers>.

You don't need to give any further information on loose food. If you decide to give other information, for example an ingredients list or best before date, you must follow the [rules for prepacked foods](#) (Food information Regulation, EU 1169/ 2011).

Whilst Suma does not sell any products made from or containing GM ingredients, if you do, you must also follow rules on how to [tell a consumer if the food contains genetically modified \(GM\) ingredients](#).

You can either display the information clearly where you market the food, or tell your customers verbally (the former is preferable, in our opinion). If you choose to give this information verbally, you must put up a notice so that your customers know that they can ask you.

BATCH CONTROL

To ensure traceability, you must retain the batch details and best before dates for all goods.

Ideally label the containers with the best before dates, and offer customers the means of date labelling their containers such as marker pens or stickers.

You must empty out old batches before re-filling containers with a new batch; don't top-up a new product on top of old batches. It's very important to ensure strict batch rotation - using up older batches before newer ones, and to know which batch you are currently selling in case of any product recalls. The older stock gets, the more likely it is to become infested.

ORGANIC GOODS

If you are decanting organic goods into bins or containers, you need to be organically certified.

There are several certifiers in the UK, including The Soil Association, that can provide organic certification for retailers. The EU organic regulations can be accessed online here – [EC 834/2007](#) & [EC 889/2008](#).

If you would like to discuss certification in more detail, The Soil Association has a designated Go Organic team

that will be happy to help. They can be contacted on +44 (0)117 914 2406 or by [email](#) at goorganic@soilassociation.org.

Please note: Organic food products have not been treated with any pesticides to kill insects – therefore organic produce may contain a small amount of insect life. As such, extra care should be taken if stocking organic products, including extra visual inspections, additional care in keeping products segregated, sealed, careful temperature control including keeping ambient products out of direct sunlight and away from heat source and additional pest control visits, among others.

STORAGE

To store dry food safely:

- Keep food in sealed containers - this helps keep food fresh and stops anything falling into the food by accident.
- Dispensers and food storage containers need to be cleaned and dried between batches.
- Don't store food or drinks near cleaning products or other chemicals.
- Don't use old food containers to store household chemicals, and don't store food in containers that have been used for other purposes.
- Foods waiting to refill containers need to be kept in appropriate storage in store rooms. This will help prevent cross contamination and infestations.
- Don't store food on the floor, because this can encourage mice, ants and other pests.
- Keep the storage area dry and cool.
- Keep the storage area clean and tidy at all times.
- Spills must be cleaned up and not left to accumulate.
- Out of date stock should be disposed of responsibly. Stock should not be left undisturbed and unchecked for long periods as this would allow any infestation to go undetected – staff should visually check stock on arrival, when decanting or dispensing and occasionally if left undisturbed for long periods.

LIABILITY

PLEASE NOTE: If Suma supplies goods which transpire to be infested we will, of course, credit customers credit for such goods. However, retailers and food handlers must practice good hygiene, segregation, traceability, pest control and stock rotation in their business.

Poor hygiene, stock rotation, pest control or segregation would allow an infestation in one product to spread to others unnoticed. As such Suma will not consider customer claims for shop infestations as they are likely to be the result of the customer's negligence rather than of every product Suma has sold being infested.

Shops should employ a reputable pest controller who has experience of food outlets and dried food products. Pest control must actively include food pests like moths, mites, weevils, not just rodents and flies.

The main causes of food infestations in stored foodstuffs in the UK include the following:

- Sugar mites. Very small mites not visible to the naked eye, which build up on dried fruit and some seeds like a white to white-brown dust.
- Moths. The Indian Meal Moth or Warehouse Moth can sometimes be found in rice, nuts, fruits and cereals. The Flour Mill Moth can be found in flours.
- Beetles and Weevils. There are many species. Beetles are probably the only food pest that can live in dried pulses but can also be found in rice and large dried fruits such as figs. Grains are very popular with weevils – particularly wheat grain.

More information on storage pests can be obtained from Suma. Please email qc@suma.coop.

CLEANING AND BODY CARE REFILLS

LABELLING

For cleaning and body care products, you must display information on dispensers as follows:

- The name of the product and product ingredients
- Safety information: CAUTION: Always keep cleaning products away from children. Store in a cool, dry place, in a clearly labelled container.
- The safety warnings that are present on the cleaning products must be displayed clearly, for example the red triangle with black exclamation mark and all accompanying text.
- Instructions for use
- Batch codes and date of filling, with details on how long the product can be used for after opening.
- Full contact details of the supplier.

All cosmetic products have to comply with the Cosmetic Products Safety Regulation 1223/2009 and Weights and Measures (Packaged Goods) Regulations 2006 (SI 2006/659). This includes refilled bottles and it is the responsibility of the seller to ensure that the labelling complies with these regulations.

BATCH CONTROL

To ensure traceability, display the batch details and best before date (if applicable) for all goods. Label the containers with this information, and offer customers the means of date labelling their own containers such as marker pens or stickers.

Empty out old batches before re-filling containers with a new batch, don't top-up a new product on top of old batches. It's vital to know which batch you are currently selling in case of any product recalls.

REFILL CONTAINERS FOR CLEANING AND BODY CARE PRODUCTS.

For cleaning and body care products, we strongly recommend that refill containers used are ones that originally contained the same product. For instance, a customer buys one or two retail sizes of washing up liquid, then brings these same bottles back to refill next time.

Some local authorities currently specify this, and given the rise of zero waste shops we expect that this rule will be rolled out nationally as a means of ensuring that consumers are sufficiently safeguarded. Check with your local Trading Standards for the latest information. You can [find your local one here](#).

It is especially important for potentially harmful cleaning materials that they are NOT put into food or drink containers that could lead to them being confused for edible products.

DISPENSING AND MEASURING

To reduce the risk of cross-contamination with allergens, ensure that an adequate number of clean, food-grade scoops are available for all self-service bulk containers. Having these secured to the relevant container with cables will help. Clean scoops regularly and replace if contamination is suspected. Advise allergen sufferers that contamination may occur, and consider serving them directly from fresh bulk containers.

It may be better for staff to measure out certain foods (e.g. nuts or spices) to customer requirements to reduce waste and risk of cross-contamination.

For liquids we would advise having drip trays beneath the dispensers to catch any liquids that overflow, to avoid a wet floor, and potential slipping hazards.

SOURCES OF FURTHER INFORMATION

Local services: We recommend working with your local Trading Standards and Environmental Health services so that advice and information can be given specific to your business and considering your unique processes and business needs.

Department of Health: Up to date guidance and regulation is available on the [Department of Health](#) website.

FSA: The Food Standards Agency is a good source for information on key regulations such as [guidance on food contact materials](#).

Soil Association: Information on certification for organic retailers <https://www.soilassociation.org/certification/food-drink/business-support>.

STOCKING ZERO WASTE

Suma has been selling sustainable products in bulk for decades, and is supplying hundreds of customers with zero waste options. We offer a full range of bulk wholefoods for dispensers and bins, and 5 litre and 20 litre drums for our body care range, ALTER/NATIVE and home cleaning range, Ecoleaf.

Discover the right zero waste range for you at www.suma.coop.

If you're an existing customer wanting to set up a refill station, call us on 01422 313840. If you are an international customer ring +44(0)1422 313842.

WE ARE SUMA

We're a co-operative of ordinary people built on integrity and equality for more than 40 years. We deliver over 7,000 vegetarian, natural, responsibly sourced products to businesses and communities across the UK and internationally. We're committed to selling only the most delicious and sustainable products, inspiring change for good.

www.suma.coop