Food Standards Scotland

For safe food and healthy eating

Food Additives Inspection Guidance

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At Food Standards Scotland we have a unique role, working independently of Ministers and industry to provide advice which is impartial, and based on robust science and data.

Our remit covers all aspects of the food chain which can impact on public health – aiming to protect consumers from food safety risks and promote healthy eating

Contents

1. Summary

Purpose

This guide aims to provide local authorities (LAs) with a summary of the legal requirements relating to food additives and the key considerations that should be taken into account when assessing business compliance.

Intended Audience

Local authority enforcement officers

Legal Status

This guidance document does not constitute legal advice and should not be taken as an authoritative statement or interpretation of the law, as only the courts have this power. It cannot cover every eventuality and LAs should ensure they also refer to the relevant legislation.

It is the responsibility of individual local authorities to decide how they will enforce food law, and they should seek their own legal advice, on a case-by-case basis, where necessary.

All references to EU law within this document should be taken as reference to assimilated EU law.

2. Introduction

Food additives are widely used throughout the food sector and need to be authorised for use in Great Britain (GB). This guidance applies only to products sold in GB. Food business operators (FBOs) producing products intended for export outside of GB will require to be aware of and ensure compliance with any legal requirements of the country where the product is sold. This includes the European Union (EU), where different requirements may apply following EU exit and changes to the authorisation process for food additives in GB.

A 'food additive' is defined in Article 3(2)(a) of Regulation (EC) No 1333/2008 as:

'any substance not normally consumed as a food in itself and not normally used as a characteristic ingredient of food, whether or not it has nutritive value, the intentional addition of which to food for a technological purpose in the manufacture, processing, preparation, treatment, packaging, transport or storage of such food results, or may be reasonably expected to result, in it or its by-products becoming directly or indirectly a component of such foods'.

This guidance covers requirements as they relate to food additives, to which Regulation (EC) No 1333/2008 applies. Similar but separate legislation covers flavourings (Regulation (EC) 1334/2008), enzymes (Regulation (EC) 1332/2008) and smoke flavourings (Regulation (EC) 2065/2003). These requirements are beyond the scope of this guidance.

The intention of this guidance is to help LAs better understand the additive authorisation process and the legal requirements in place in GB. It does not seek to provide an interpretation on the application of all requirements laid down within this regulation, nor does it provide authoritative interpretations of the law and is not a substitute for an understanding of the legal requirements. It should be read in conjunction with the relevant legislation as laid out below.

This guidance refers to food law as it applies in Scotland. Any reference in this document to EU law or "EC regulation" etc., unless otherwise stated, should be considered a reference to law that was assimilated into domestic legislation by the Retained EU Law (Revocation and Reform) Act 2023.

3. Legislative overview

Regulation (EC) No 1331/2008 establishes a common authorisation procedure for food additives, food enzymes and food flavourings:

- Article 2C - Requires establishment and maintenance of a 'domestic list' of regulation products, including authorised additives.
- For Scotland, this can be found in the GB Register of Food Additives Authorisations.
- Guidance on the use of the register is also available.

Regulation (EC) No 1333/2008 lays down the rules on food additives used in foods. For the purposes of this guidance document, some of the key articles within this Regulation are:

- Article 4 – Requirement for food additives to be authorised before being placed on the market and used in food.
- Article 5 –Requirement for food additives, or any food in which such a food additive is present, to only be placed on the market if the use complies with this Regulation.
- Article 14B – Requirement for FSS/FSA to include content of authorisations in the domestic list.
- Article 18 – The carry over principle (discussed further below)
- Article 24 and Annex V - Additional labelling requirements for certain food colours.

The Food Additives, Flavourings, Enzymes and Extraction Solvents (Scotland) Regulations 2013 provide for the enforcement in Scotland of Regulation (EC) 2065/2003, Regulation (EC) 1332/2008, Regulation (EC) 1333/2008 and Regulation (EC) 1334/2008:

- Regulation 3 (as read with schedule 1) – Offence to contravene Regulation 1333/2008.
- Regulation 16 – Interpretation of 'food safety requirements' for the purposes of section 9 of the Food Safety Act 1990 in so far as it relates to this legislation.

As set out in Regulation (EC) No. 1333/2008, food additives must be authorised and meet any conditions of use, such as labelling specifications or restrictions on ingredient usage.

Regulation (EU) No 1169/2011 on the provision of Food Information to Consumers (FIC) provides the basis for the assurance of a high level of consumer protection in relation to food information and establishes the general principles, requirements and responsibilities governing food information, in particular food labelling. For the purposes of this guidance document, some of the key Articles within this Regulation are:

- Article 18 and Annex VII Part C – Requirement for food additives in a list of ingredients to be designated by their category followed by name or E-number.

More information on additive labelling can be found in the relevant section of this guidance document.

The Food Information (Scotland) Regulations 2014 provide for the enforcement in Scotland of Regulation (EU) 1169/2011:

- Regulation 10 – Offence to fail to comply with any FIC provision.

4. Additive authorisations

The GB Register of Food Additive Authorisations (domestic list) is the primary source of information on food additives authorised for use in Great Britain.

The register outlines the product details, status of the authorisation and links to the terms of that authorisation, including the specification and conditions of use. A step-by-step guide to navigating the register can be found in Annex I.

Please note: Details of product authorisations are maintained in versions of Annex II and III of Regulation (EC) No 1333/2008 that were in effect prior to legislative updates implemented in GB in April 2025. This means that authorisation details cannot be obtained by accessing Regulation (EC) No 1333/2008 as it is currently in force and provided on legislation.gov.uk. Officers must navigate to a previous version of Annex II (conditions of use in food) and III (conditions of use in food additives, enzymes, flavourings and nutrients) via the authorisation register to obtain the accurate information.

Authorisations for food additives use a food categorisation system. The categories used are outlined in the guidance on using the register. By identifying the category a product falls into, an officer should then be able to use the register to determine whether a specific additive is authorised for use and, if so, what its conditions of use are.

The food categorisation system does not specifically consider compound foods such as prepared meals, which may contain component ingredients from several different food categories. In determining whether use of an additive is authorised in such foods, consideration will require to be given to the carry over principle, which is discussed later in this guidance.

An EC guidance document describing the food categories is available, which may be of assistance in determining the correct category for a food. Officers should, however, be aware that as this is an EC document, there may be differences in relation to sub-category titles and restrictions/exceptions for some food categories following EU Exit and should always refer to the authorisation for Great Britain.

5. Additive groupings

Some additives belong to one or more groups of additives. This needs to be taken into consideration when verifying additive use, as an authorisation may detail limits for the group in addition to or instead of the individual additives within it.

The GB Register of Food Additive Authorisations identifies whether an additive is a member of any group. Further information on the groups of additives can be found in the Part C of Annex II to Regulation (EC) 1333/2008, as it applied prior to April 2025, however, this requires to be considered together with the conditions for the relevant food category (Part E).

6. Carry over principle

The carry over principle is provided for by Article 18 of Regulation (EC) 1333/2008.

This principle allows a food additive to be present in food, other than by direct addition, if it is present/carried over from an ingredient within a compound food. This is permitted, providing the additive level in the final food is no greater than would be introduced by the use of the ingredient under proper technological conditions and good manufacturing practice.

For example:

- A fruit yoghurt consisting of plain (unflavoured) yoghurt (food category 1.2) and a fruit compote (food category 4.2.4.2) would be permitted to contain ascorbic acid (E300) due to the carry over principle. Whilst ascorbic acid is not permitted in plain yoghurts, it is permitted in fruit compote at quantum satis. The level used must not exceed the maximum level for the fruit preparation element of the yoghurt.
- Meat products, such as sausages, would be permitted to contain anti-caking agents such as Silicon Dioxide (E551) due to the carry over principle. Whilst Silicon Dioxide (E551) is not permitted in meat products, it is permitted in salt (food category 12.1.1) and salt substitutes (food category 12.1.2). The level of Silicon Dioxide (E551) used must not exceed the maximum level permitted in the salt or salt substitute as a component of the meat product.

A food additive may also be present in a compound food where it is not normally permitted, only if this product is to be used solely as a component for the production of a final food product where the specific food additive is permitted. This is referred to as the ‘reverse carry over principle’.

For example:

- Annatto bixin (E160b(i)) (a colouring agent) is not normally permitted to be used in seasonings (food category 12.2.2), but it is permitted in potato-based snacks (food category 15.1) at a maximum permitted level of 20mg/kg. Annatto bixin (E160b(i)) can therefore be added to a seasoning that is intended solely for use in a potato-based snack food, provided the level used does not exceed the maximum permitted level for the relevant food category (15.1). However, annatto bixin (E160b(i)) would not be permitted within a seasoning intended for use within any food category that does not permit its use, such as a minced meat preparation (food category 8.1).
- Sodium carbonates (E500) is a Group 1 additive that is not normally permitted to be used in self-raising flour (food category 6.2.1), could be added to self-raising flour that is intended solely for use in fine bakery wares (food category 7.2), as Group 1 additives are permitted to be used in these foods.

This principle does not apply when the additive carried over has a technological function in the final food. In these circumstances, the final food must comply with the relevant provisions. It also does not apply where an ingredient remains a separate

part of the compound food and the technological function of the food additive is confined to that ingredient. The conditions in accordance with its food category continue to apply for that ingredient.

Article 18 of Regulation 1333/2008 states that the carry over principle does not apply to:

- Infant formulae
- Follow-on formulae
- Processed cereal-based food and baby food
- Dietary food for special medical purposes intended for infants and young children, except where specifically provided for.

Some further exceptions are detailed in Table 1 of Annex I (a) of the Regulation. Officers should refer to the legislation for specific exceptions, but some examples include:

- Unprocessed foods
- Butter
- Unflavoured UHT milk
- Foods for infants and young children

Table 2 in Annex I (a) also provides a list of foods for which food colours are not permitted by virtue of the carry over principle.

Article 20(b) of Regulation (EU) 1169/2011 states that food additives or enzymes whose presence in a given food is solely due to the carry over principle, and provided that they serve no technological function in the finished product, are not required to be included in the list of ingredients.

If the food additive does provide a technological function in the final product, then the additive must be indicated on the label and the carry over principle is not applicable.

When considering whether the carry over principle is applicable:

1. Establish whether the additive is added intentionally during the production process.
2. If not added intentionally, consider the level analysed in the product as a whole; the presence of the additive must be proportional to the ingredient in which the additive is permitted.
3. Decide whether it is necessary to label the presence of the additive.

7. Further compliance considerations

An additive is prohibited unless it conforms with the conditions of use outlined in the GB list of Food Additives Authorisations. An additive may appear on the list, but it is only authorised for the functions/foods detailed in the authorisation.

Many additive authorisations will specify maximum limits, which are based on the food as sold, unless otherwise specified. The maximum limits for dried and concentrated foods should be calculated based on the reconstituted food, as per the manufacturer's instructions and the minimum dilution factor.

In some cases, the conditions of use in the authorisation will note that the limit relates to the additive as expressed in a specific form. It is important, therefore, that any notes associated with the authorisation are taken into consideration as this may require calculations to be carried out. For example, the conditions of use generally require nitrates and nitrites to be expressed as sodium nitrate or sodium nitrite. Therefore, where potassium salts are used (E249 Potassium Nitrite or E252 Potassium Nitrate), a conversion factor requires to be applied to identify the relevant limit as follows:

- *Potassium nitrite to sodium nitrite equivalent: divide by 1.23*
- *Potassium nitrate to sodium nitrate equivalent: divide by 1.19*

These conversion factors are based on the relative molecular weights of the sodium and potassium salts and ensure equivalent amounts are compared with the legal limits.

Certain substances, for example phosphates and glutamates, are naturally present in certain foods. The quantitative limits apply to the amount of additive added. There is an exception in the case of sulphites, as the specified quantitative limits include sulphites available from all sources and therefore consider any natural occurrence of the substance. This is specified in footnote (3) in the relevant conditions of use in foods in the authorisations for the permitted use of sulphur dioxide – sulphites (E220-228).

Instead of a maximum limit, some authorisations will set a level of "quantum satis". Quantum satis means that as much of the additive as is needed to achieve the desired result, but not more, shall be used in the food concerned in accordance with good manufacturing practice. It must not be used at a level higher than is necessary to achieve the intended purpose and must not be used in a way that misleads the consumer.

8. Additive labelling

Chapter IV of Regulation (EC) No 1333/2008 specifies different labelling requirements for food sold to the final consumer and food sold to other businesses. Specific derogations from the requirements are also provided.

Specific labelling requirements are also laid down for six authorised food colours (the Southampton Six); Tartrazine (E 102), Ponceau 4 R (E 124), Sunset yellow (E 110), Carmoisine (E 122), Quinoline yellow (E 104) and Allura Red (E 129). Foods containing these colours are required to be labelled with the following additional information:

> **‘‘name or E number of the colour(s)’: may have an adverse effect on activity and attention in children.’**

The above requirement has some limited exceptions:

- Health or other marking on meat
- Stamping eggshells
- Beverages containing more than 1.2% by volume alcohol

Article 18 and Annex VII Part C – Requirement for food additives in a list of ingredients to be designated by their category followed by name or E-number.

9. Verifying Food Additive Use

Food business operators (FBOs) should assess food additive use and implement control procedures to ensure their products are safe and within legal limits, in the same way as they do for all other food hazards.

The following factors should be considered during inspection.

Food Safety Management System (FSMS)

Food additives used within an establishment should be identified as chemical hazards requiring control within the FSMS.

All food additives used should be clearly identified within the FSMS, along with the legal limits of use permitted in accordance with the legislation. Controls must be in place to ensure that additive limits are not breached, with critical control points identified within the system, where required.

Recipes and manufacturing instructions

Additive use should be considered by FBOs during product development. Product recipes and manufacturing instructions should reflect the relevant requirements for additive use. Additives used should be included in product recipes, with clearly

defined amounts, to ensure the limits defined during product validation are consistently adhered to.

Where the legal limit is quantum satis, recipe testing during product development should be considered. This should evidence that the final recipe content is demonstrably the minimum content required to achieve the desired effects in the given product.

Catering establishments should also give consideration to the amount of additive they are adding to a dish. Some level of control, such as clear cooking instructions and staff training, should be in place to ensure maximum limits are consistently adhered to.

Additive labels and technical data sheets

The authorisation for each food additive includes a specification which that additive must meet. This can be accessed from the register entry for each additive. Examining the technical data sheet for an additive will assist an officer in determining whether it complies with the specification and is being used in accordance with manufacturer instructions.

The additive label or technical data sheet should also be checked to determine whether the additive being used is pure, or whether it is part of another ingredient, for example a seasoning. The proportion of additive within the ingredient being used must be considered when the FBO is devising the recipe to ensure the final product will be within legal limits.

Labelling

Examples of the FBOs product labels should be checked to ensure that any additives within the product are clearly identified. Consideration should be given to the FBOs contingency procedure for product labelling should an additive substitution be required.

Sampling

FBO sample results should be reviewed as part of the FBOs validation of their product recipe.

LAs may want to consider conducting official control sampling for establishments that do not have clear evidence to show that maximum additive limits are being met.

Verification

To verify food additive use, it may be beneficial to select specific product/additive combinations used in the business and consider these in detail, rather than consider controls in general. In order to do this, it will be necessary for the officer to understand the products and additives in question so that they

can identify the limits that the business requires to achieve. Some worked examples are provided in Annex 3 which may be of assistance.

Annex 1 – Quick Guide to Using the Register of Food Additive Authorisations

Identify Additive Name and/or E Number	• At least one of these is required to search the register
Identify food category for product in question	• List of categories can be found in Part D of Annex II of Regulation (EC) 1333/2008 as it had effect before 1 April 2025 • Note category 0 includes all foods (with relevant restrictions/exemptions) so should be considered together with any specific category
Access register	• The Register of Food Additive Authorisations • Publicly available register with no login requirements
Search by additive name or E number	• Click on additive to open authorisation • Note in Product Details whether additive also belongs to any groups as conditions of use may relate to groups as well as individual additives • Ensure additive is authorised for use in Scotland.
Open 'Conditions of Use in Foods'	• Directs to Annex II of Regulation (EC) 1333/2008 as it had effect immediately before 1 April 2025, which reflects conditions of the authorisation
Scroll to Part E: Authorised Food Additives and Conditions of Use	• 14 tables, each linked to food categories • Select table for food category in question
Identify Conditions of Use for Additive/Food combination	• If additive is authorised in the food, it will be listed, together with any conditions of use. If it is not listed, either on its own or as part of a group, it means it is not authorised for that food category. • Need to check any groups additive is part of in addition to individual additive. • Notes apply in many cases with additional details on conditions of use. • Please note that there might be some exceptions, e.g. the Wine Regulations 2019/934.

Annex 2 – Examples of LA sample failures for additives

Name of Additive and inclusion in any additive group(s)	Product Category, including examples	Maximum level permitted (mg/l) or (mg/kg)	Examples of Non-compliance
Sulphur Dioxide (SO_2) E 220 Group(s): E 220–228: Sulphur dioxide — sulphites	08.1 Fresh meat, excluding meat preparations as defined by Regulation (EC) No 853/2004	Not permitted Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 1501-1750	• Presence of sulphur dioxide in minced beef
	08.2 Meat preparations as defined by Regulation (EC) No 853/2004	450mg/kg Only permitted in burger meat with ≥4% vegetable or cereal content, breakfast sausages and some traditional Spanish/Portuguese meat preparations Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 1501-1750	• Exceedance of permitted level in burgers and sausages • Presence in meat preparations where SO_2 is not permitted
Propionic Acid E 280 Group(s): E 280–283:	07.1 Bread and rolls	1000-3000mg/kg Different levels apply to different types of bread product, as specified in the authorisation. Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 1251-1500	• Exceedance of permitted level in naan breads, flatbreads and tortillas

Propionic acid — propionates			
Sorbic Acid E200 Group(s): Multiple Groups – see authorisation for detail	01.4 Flavoured fermented milk products including heat-treated products	300 mg/kg Only non-heat-treated dairy-based desserts Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 1 - 250	• Presence in products not covered by authorisation (Flavoured yoghurt)
Sodium Nitrate E251 Group(s): E 251–252: Nitrates	08.2 Meat preparations as defined by Regulation (EC) No 853/2004	Not permitted Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 1501-1750	• Presence in raw cooking chorizo Note that cured chorizo would fall into a separate food category (08.3.1 - non-heat-treated meat products) which permits nitrates to be added up to 150 mg/kg during manufacturing
	08.3.4.2 Traditional dry cured products	250 mg/kg Maximum residual amount, residue level at the end of the production process, expressed as $NaNO_2$ or $NaNO_3$ Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 1501-1750	• Exceedance of permitted level in dry cured bacon
Ponceau 4R E124	12.6 Sauces	Not permitted Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 2251-2500	• Presence in takeaway sauces

Allura Red E129 Group(s) Group III: Colours with combined maximum limit	08.3.1 Non-heat-treated meat products	Not permitted Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 1501-1750	• Presence in marinated chicken Similar failures noted for carmoisine (E 122) and tartrazine (E 102)
Monosodium Glutamate E621 Group(s): Group I and E 620–625: Glutamic acid — glutamates	12.6 Sauces	E620-E625 Permitted at up to 10g/kg, expressed as glutamic acid. Assimilated Regulation (EC) No. 1333/2008 – Annex II Rows 2251-2500	• Exceedance of permitted level in takeaway sauce

Annex 3 – Worked Examples

Example A:

A butcher produces beef burgers using a seasoning blend as part of the recipe. The packaging for the seasoning shows that this contains sulphur dioxide (E 220). The inspecting officer wants to verify that the use of the additive is in accordance with the authorisation.

- **Determine the food category**

The beef burgers are sold raw. The appropriate food category would therefore be:

Category 08.2 Meat preparations as defined by Regulation (EC) No 853/2004

- **Determine whether the additive in question is permitted**

Additive: Sulphur Dioxide E 220
Groups: Sulphur Dioxide – Sulphites E220 – E228

From authorisation:

E220-E228 sulphur dioxide – sulphites are permitted up to 450mg/kg in burger meat with a minimum vegetable and/or cereal content of 4% mixed within the meat.

The documented recipe includes 500g rusks per 10kg batch. This equates to a cereal content of 5%, therefore, E220 is permitted in this product.

- **Determine whether the product composition is compliant**

E220-E228 is permitted up to 450 mg/kg. The notes indicate that this is the maximum level expressed as SO_2 from all sources.

As the authorisation does not specify otherwise, in accordance with Article 11, the level applies to the limit in the food as marketed.

The technical data sheet for the seasoning confirms that it contains E220 at 1.5%. No other sulphites are present and there are no other sources of sulphites in the recipe.

The authorisation limit is in mg/kg. It is therefore necessary to calculate the volume of additive present in one kg of the burger meat being produced. This should be calculated as follows:

> The recipe indicates that 250g of seasoning is added per 10kg batch of burger meat. Dividing both amounts by 10 shows that there is 25g of seasoning for every 1 kg of burger meat.

The concentration of SO_2 in the seasoning is 1.5%.1.5% of 25 is 0.375, meaning there is 0.375g (equivalent to 375mg) of SO_2 in 25g of seasoning and 1 kg of burger meat.

- **Conclusion**

If process controls are in place to ensure the recipe is adhered to, this would result in a finished product which contains 375 mg/kg SO_2, which is within the level permitted by the authorisation.

Example B:

An officer is carrying out an inspection of a ready meal manufacturer. The business use monosodium glutamate (MSG) (E 621) as an ingredient and the inspecting officer wants to verify that it is being used in accordance with the authorisation. They select a sweet and sour chicken product to consider in detail as part of the verification process. The final product contains cooked chicken, sweet and sour sauce, onions, peppers and pineapple.

Determine the food category

There is no single product category which would cover the sweet and sour chicken, as a compound food.

Having reviewed the recipe and product specification, for the purposes of food additive authorisations, the officer considers the product is a compound food which comprises ingredients from different food categories:

Cooked chicken (40%)	Category 8.3.2 Heat-treated meat product
Cooked vegetables (20%)	Category 4.2.4.1 Fruit and vegetable preparations
Sauce (40%)	Category 12.6 Sauces

Determine whether the additive in question in permitted

Additive: Monosodium glutamate (E 621)
Groups: Group I and group E 620–625: Glutamic acid — glutamates

From authorisation:

Part C(1) of Annex II in the authorisation details that E621 is a member of Group I, with a limit of 10g/kg either individually or combined with E620-E625, where that group is permitted in a food, expressed as glutamic acid.

Ingredient	Group 1
Chicken Cat 8.3.2	Permitted as per group I criteria i.e. 10g/kg E620-E625, expressed as glutamic acid

Vegetables Cat 4.2.4.1	Permitted as per group I criteria i.e. 10g/kg E620-625, expressed as glutamic acid
Sauce Cat 12.6	Permitted as per group I criteria i.e. 10g/kg E620-E625, expressed as glutamic acid

Determine whether the product composition is compliant

From the recipe and manufacturing instructions, the officer establishes that the MSG is added as an ingredient within the sauce and no other ingredients used contain the additives E620-E625

The recipe indicates that 200g MSG is added to each 10kg batch of sauce, which equates to 20g/kg of E621. The authorisation states a level, expressed as glutamic acid rather than monosodium glutamate.

The officer checks the data sheet for the MSG, which confirms it is entirely MSG with no other ingredients. From research they establish that MSG contains 87.72% glutamic acid, therefore, the 20g/kg equates to a glutamic acid content of 17.5g/kg in the sauce.

Conclusion

The average glutamic acid content across all components of the sweet and sour chicken would be 7g/kg (as the sauce makes up only 40% of the meal and there are no other sources of glutamic acid). However, each component of the compound food must comply with the conditions of use in the authorisation.

The presence of E621 at 20g/kg in the sauce, equivalent to 17.5g/kg glutamic acid, exceeds the permitted 10g/kg glutamic acid for that component of the food. The product is therefore non-compliant with the authorisation.

Annex 4 – Aide memoire

Considerations	Notes
Identification of additives used • Are additives used listed in the FSMS? • Additives on site that are not listed? • Consideration of substitute additives/additive containing ingredients? • Additive labels/technical data sheets available?	
Establishing Additive limits • Have correct legal limits been identified? • Do limits used align with correct product category? • If limit is quantum satis, has FBO defined this for their product specification? Does the carry over principle apply?	
Adherence to limits • Has FBO calculated the amount of additive to be used? • Has calculation been done for correct stage of inclusion, as per authorisation? • If quantum satis – how has FBO determined additive amount required? • How has this been validated? • Process/recipes/manufacturing instructions in place to ensure limit is not breached? • Have naturally occurring sulphites been considered, where applicable?	
Labelling • Are products accurately labelled with additive name or E number? • Do any additional labelling requirements apply?	
Staff training • Are staff trained in product production/additive usage? • Do staff show a clear understanding of how additives should be used? • Do staff responses align with FSMS?	
Verification • Consideration of additives in sampling plan • Do other verification activities cover food additive use	

Annex 5 – Food additives audit form

Food Additives Audit			
Product Name		Compound Food?	Yes/No
Additive (Including groups):			

Officer Assessment of Requirements			
Food/Ingredient	Food Category	Permitted/Limits	Notes

Assessment of Compliance with Requirements	
	Record Sources of Evidence
Has the business correctly identified the limits permitted in the product/components of compound product? **Have any conditions of use been identified and complied with?**	
Are adequate procedures in place to ensure limits are consistently achieved?	
Verification arrangements	
Recommended improvements	