

## Guidance

# Labelling requirements for certain products moving from Great Britain to retail premises in Northern Ireland under the Northern Ireland Retail Movement Scheme

Labelling rules for businesses in Great Britain (England, Scotland and Wales) and retailers in Northern Ireland, for certain agri-food products moved under the Northern Ireland Retail Movement Scheme.

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From: **Department for Environment, Food & Rural Affairs**

**(/government/organisations/department-for-environment-food-rural-affairs)**

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Businesses in Great Britain (England, Scotland and Wales) can move some goods to Northern Ireland through the Northern Ireland Retail Movement Scheme (NIRMS). This includes prepacked retail goods as well as some loose goods, including fruit and vegetables.

There are labelling requirements for moving goods through NIRMS to make sure that goods are not moved onwards into the EU. These include different requirements for:

- labelling some individual products
- labelling boxes where the products inside the boxes do not need to be individually labelled
- displaying signage in retail premises in Northern Ireland for products that do not need to be individually labelled

The business or trader moving the goods is responsible for:

- ensuring that the labelling requirements are met
- following the existing food packaging and labelling regulations that apply in the UK and any health and identification marks needed

## Individual labels

Under NIRMS, some food products require individual product labels with the words 'Not for EU'. These requirements are being introduced in 3 phases from October 2023 to July 2025. This includes products imported into Great Britain from the EU and products from the rest of the world that can move under NIRMS.

Only products moving into Northern Ireland under NIRMS need to meet the labelling requirements.

### Phases 1 and 2

All meat products and dairy products must be individually labelled.

Check the descriptions of products included in phases 1 and 2 on this page.

## Phase 3

From 1 July 2025, individual labels are also needed for:

- some composite products
- fruit and vegetables
- fish
- some other products

Check the descriptions of products included in phase 3 on this page.

If products are individually labelled, you do not need to label the box.

Not all products need to be individually labelled. You can also check the list of exempt products on this page.

## Phase 1: Products that need individual product labels from 1 October 2023

Individual labels are required on:

- all prepacked meat and meat products (meat packed for the final consumer)
- meat packed on sales premises
- some dairy products

### Prepacked meat and meat products

‘Meat’ is defined as the edible parts of any animal intended for human consumption.

‘Meat products’ are meat that has been substantially altered by processing. This includes by heating, smoking, curing, maturing, drying, marinating, extraction, extrusion or a combination of those processes.

Meat includes but is not limited to all fresh and frozen meats, such as:

- pork, including bacon, sausages, joints
- beef, including mince, joints, steaks, diced braising meat, burgers
- chicken, including whole, breasts, fillets, diced meat, thighs, shredded chicken, sausages
- lamb, including steaks, leg, shoulder, diced braising meat
- duck meat, venison, other game meats
- other similar meat and meat preparations
- exotic meats

- products which consist of animal fats, including gelatine or animal blood

Meat products include:

- chicken nuggets, chicken dippers, other breaded and battered chicken products, chicken wings and breasts in sauce (except where these are determined to be a composite product)
- burgers, minced meats, sliced red meats, sausages including cocktail sausages
- pâtés and similar meat-based spreads
- duck and goose fats

These products could be fresh, chilled, frozen, deep-frozen or thawed.

### **Meat packed on sales premises**

This is meat that is prepared and packed before sale to a consumer, such as:

- meat and animal origin products that are butchered on site, packaged and sold on the shop floor, such as cuts of steak or lamb, fresh poultry or cuts of game
- meat products that are processed and packaged on site, such as fresh mince products or burgers
- meat on supermarket deli or butcher counters where the product is packaged before sale

### **Some dairy products (including both prepacked and packed on sales premises)**

This includes:

- pasteurised milk, buttermilk, or cream products
- cottage cheese, quark cheese or raw (unpasteurised) cheese
- crème fraîche and sour cream

### **Compound products**

Compound products are products that contain:

- more than one product of animal origin (POAO)
- no plant products other than those for flavouring

Compound products are included in phase 1 if they contain products in the phase 1 list. For example, a pâté that has a duck and a dairy product, or a

steak with a butter pellet. Both contain meat and dairy as the main ingredients and a small amount of plant products for flavour. They are therefore compound products and part of phase 1. Find out [how to identify compound products \(https://www.gov.uk/guidance/import-compound-products-from-the-eu-to-great-britain#compound-products\)](https://www.gov.uk/guidance/import-compound-products-from-the-eu-to-great-britain#compound-products).

## Commodity codes for products included in phase 1

You can also [use the lists of commodity codes \(https://www.gov.uk/government/publications/list-of-commodity-codes-that-need-individual-labels-in-phase-1-under-the-retail-movement-scheme\)](https://www.gov.uk/government/publications/list-of-commodity-codes-that-need-individual-labels-in-phase-1-under-the-retail-movement-scheme) to confirm which products need labels in phase 1.

## Phase 2: Products that need individual product labels from 1 October 2024

Since 1 October 2024, all milk and dairy products also need to be individually labelled.

### Dairy products

Dairy products are products resulting from the processing of raw milk or other dairy products. Dairy products include, but are not restricted to:

- all milk, including pasteurised, thermised and ultra-heat-treated (UHT) milk and flavoured milks
- buttermilk or cream produced from animal products, including flavoured products
- cheeses produced from animal milk, including cottage cheese, hard cheeses and blue cheeses
- yoghurt, including flavoured and natural yoghurts
- butter
- whey and whey products
- butteroil and other dairy-based oils
- fermented dairy products, including kefir, koumiss, viili, fil, smetana, rjaženka and rūgušpiens
- caseins and anhydrous milk fat (AMF)
- ice cream made only from dairy products, stabilisers, flavourings and sweeteners. For example, a frozen yoghurt with added sugar and vanilla flavouring, or an all-dairy ice cream with no added oils

### Composite products

Phase 2 does not include composite products that contain products from this list.

Composite products are products that contain both:

- plant products
- processed POAO for human consumption

For example, a chilled pizza with processed cheese does not need individual labelling in phase 2.

It is not a composite product if a plant product only adds special characteristics to a POAO, such as flavour, sweetness or as a thickening or decorative agent. These products therefore need to be individually product labelled.

The following examples are still defined as dairy products, as the plant product only adds flavour:

- cheese with added herbs
- yoghurt with added fruit
- breaded cheese, such as mozzarella sticks

## Compound products

Compound products that need labelling in phase 2 are dairy products combined with another POAO, such as dairy or fish. For example, fish with a cheese sauce or prawns packaged with a dairy dip.

## Commodity codes for products included in phase 2

You can also [use the lists of commodity codes \(https://www.gov.uk/government/publications/list-of-commodity-codes-that-need-individual-labels-in-phase-1-under-the-retail-movement-scheme\)](https://www.gov.uk/government/publications/list-of-commodity-codes-that-need-individual-labels-in-phase-1-under-the-retail-movement-scheme) to confirm which products need labels in phase 2.

## Phase 3: Products that need individual product labels from 1 July 2025

From 1 July 2025, additional food and retail goods must be individually labelled. This includes composite products that are not shelf stable or require sanitary and phytosanitary controls, such as pizza.

Composite products contain both products of plant origin and processed POAO for human consumption. [Use the decision tree to determine whether your product is a composite product](#)

[https://assets.publishing.service.gov.uk/media/65859a84ed3c34000d3bdfd0/Defra\\_Composite-Products-Decision-Trees-Leaflet.pdf](https://assets.publishing.service.gov.uk/media/65859a84ed3c34000d3bdfd0/Defra_Composite-Products-Decision-Trees-Leaflet.pdf).

Some plant-based products are subject to official controls, meaning they need individual labels.

Pet food and the following products for humans need individual labels in phase 3.

### **All pre-packed and sealed fruit and vegetables**

Such as:

- packed fruit such as apples, oranges, blueberries
- green beans, beansprouts and other packaged vegetables
- herbs, including those in bags

Some fruits are deregulated in accordance with plant health legislation and do not need individual labelling. Some fruits and vegetables that are processed do not need individual labelling. Read the list of exemptions on this page to check which fruit products do not need individual labels.

### **All fresh, frozen and processed fish**

Such as:

- fresh fish such as haddock, cod, salmon, trout, monkfish
- other fresh seafood such as prawns, crab, lobster
- tinned fish such as tuna, anchovies, mackerel
- breaded and battered fish products such as fillets and scampi
- seafood sticks
- fish pâté

### **Other POAO**

Such as:

- eggs
- honey

### **All chilled or frozen composite products and some chilled plant products that require certification or controls at a border control post (BCP)**

Such as:

- quiches, lasagne, pork pies, scotch eggs, tortillas or omelettes, coleslaws, potato salads and other similar savoury snacks
- pasta sauces, guacamole, thousand island dressing, gravy, hummus and other similar sauces and dips
- pizzas, raviolis and other pastas containing meat, pasties, pies, noodles containing meat, meal kits with dairy sauce, loaded fries, ready meals and other similar chilled meals
- eclairs, doughnuts, tarts, trifles, sundaes, crumbles, pies, mousses, brownies, strudels and other similar chilled or frozen desserts
- ice creams that are a mix of dairy products and plant products not used simply for flavouring (such as oils)
- chilled soups containing meat or fish
- chilled dairy-based drinks such as iced lattes and milkshakes

### **All shelf-stable composite products, unless they are listed in the 'Exemptions' section**

Shelf-stable composite products that do require individual labelling include:

- baking ingredients
- icing mixes
- meal kits where they contain non-exempt POAO such as cheese
- infant or baby powders and formula
- mayonnaise and pesto

### **Some cut flowers**

Cut flowers where they are listed in Part A of Annex XI and Annex XII to the phytosanitary conditions Regulation (EU) 2019/2072, such as:

- cut conifer, pine and fir trees
- cut Christmas trees
- orchids
- roses
- chrysanthemum

## **Exemptions: food products that do not need individual labels**

Some cases are exempt from individual labelling requirements. This applies to both specific products and specific settings where products are sold, as follows.

Box and retail premises labelling requirements still apply for the majority of exempt products.

## **Products sold in specific settings exempt from individual labelling**

Products are exempt from individual labelling if they are:

- sold loose or by weight on the sales premises at the consumer's request, such as loose fresh fruit, cheese and meat deli counters or refillable cereal containers
- processed and sold on the sales premises by a retailer, at the consumer's request, for direct consumption. For example, freshly produced pies or croissants, or food served in an in-store restaurant
- for sale in a factory canteen or other similar food service operator, and are intended for eating on the spot in Northern Ireland. For example, products sold in institutional canteens, restaurants, schools, prisons, hospitals or onboard an airline. These products are exempt from all labelling requirements, including at box level

Products still require individual labelling if they are processed on the same premises or sold by weight, but are packaged before the consumer requests.

If a product is exempt from individual labelling due to the setting where it is sold, it requires box-level labelling unless the product is made for eating on the spot. For example, if you sell portions of cheese at a deli counter it would not need individual labelling but would instead require labelling on the box that the whole was moved in. Cheese sold in a supermarket however no longer needs box-level labelling, as it is now individually labelled.

## **Products that are exempt from individual labelling in all settings**

Products can be exempt from individual labelling because:

- they do not require certification or controls at agri-food points of entry under the EU's Official Controls Regulation
- EU public health requirements are met as set out in EU legislation and are matched in UK law
- the products are deregulated in accordance with plant health legislation

Most processed shelf-stable products that do not contain POAO are exempt from individual labelling. The following types of products are exempt from individual labelling.

## **All processed fruit and vegetables**

This applies provided that they are not subject to official controls at a BCP according to the Official Controls Regulation, such as:

- mixed fresh fruit, such as fruit salads
- fresh salad bags, salad boxes and ready-to-eat salads
- tinned fruit and vegetables
- canned soups that do not contain POAO
- baked beans
- chopped tomatoes
- preserved vegetables
- shelf-stable olives, including those stuffed with other vegetables, cheese or fish

### **Most dried fruit and vegetable products**

Such as:

- raisins and other dried fruits
- dried herbs and spices
- vegetable crisps and other dried vegetables

### **All deregulated fruits in any form (except where a phytosanitary certificate is required)**

Such as:

- pineapples
- bananas
- coconuts
- dates
- durians

### **Most frozen products without POAO**

Such as:

- frozen fruits, including fruit mixes and crushed fruits
- frozen peas, carrots, sweetcorn and other vegetables
- frozen chips
- non-dairy ice creams and sorbets
- ice lollies
- smoothie mixes

### **Most spreads**

Such as:

- jams, marmalades, conserves and preserves produced from any fruit except grapes or bananas
- peanut butter and other nut butters
- marmite and yeast extract products
- lemon curd and other fruit curds
- chocolate spreads
- vegetable spreads

### **Table sauces and condiments**

Such as:

- pasta sauces and curry sauces
- tomato ketchup
- mustard
- vinegar
- brown sauce
- chilli and hot sauce
- Worcester sauce
- chutneys
- soy sauce
- miso

### **Grains, pulses and cereals**

Such as:

- raw cereals including grains, wheat and oats and other similar products
- breakfast cereals, including those containing sugar or chocolate
- any product produced from roasted or unroasted cereal flakes
- rice and rice pouches
- quinoa
- couscous (except where it contains unprocessed fruit or vegetables or any meat)
- pulses and grains, including bulgar wheat, lentils and pearl barley
- flour
- bread mixes
- ambient bread, cakes, biscuits, waffles and wafers, rusks, toasted bread and similar toasted products
- pasta and noodles, including those containing dairy products, except where it contains meat

## **Snacks**

Such as:

- crisps, including those containing dairy products or flavourings
- nuts
- seeds
- crackers
- popcorn
- biscuits

## **Cooking oils**

Such as:

- olive oil
- vegetable oil
- sunflower oil
- rapeseed oil
- ground nut and other nut oils
- cooking sprays

## **Sugars and confectionary, sweets and chocolate products, including those containing milk**

Such as:

- white chocolate, milk chocolate and dark chocolates regardless of cocoa percentage
- hot chocolate drinks and mixes
- boiled sweets
- marshmallows
- gelatine-based sweets
- all types of sugar including natural, caster, granulated, Demerara and cane
- all types of syrups including golden, maple and treacle

## **Most alcoholic and most non-alcoholic drinks**

Such as:

- gin, rum, vodka, liquors and other alcoholic spirits
- wine, including champagne, prosecco, other sparkling wines, port and brandy
- shelf-stable cream liquors and spirits

- beers (except those containing products that require labelling such as honey)
- cider (except those containing products that require labelling such as honey)
- soft drinks
- cordials
- fruit juices (except grape juice)
- water, including spring waters and mineral waters
- energy drinks

### **All hot drinks that do not contain milk**

Such as:

- tea, including teabags, loose tea and instant tea
- coffee, including instant coffee, coffee beans, pods
- tea blends and infusions
- chicory and other alternative hot drinks

### **Some cut flowers**

Cut flowers that are listed in Part B of Annex XI to the phytosanitary conditions Regulation (EU) 2019/2072, such as:

- lilies
- sugarbushes
- cut trees other than conifers, firs or Christmas tress
- daisies

### **Other products**

Such as:

- all 'alternative' plant-based milk substitutes, such as oat milk
- all food supplements that are packaged for the final consumer, whether or not they contain any animal products (including whey-based supplements)
- dental products for consumption, such as mouthwash, toothpaste and other similar products
- all food contact materials, including disposable cutlery, plates, food storage containers, coffee machines, blenders and other similar products
- all flavourings

### **Commodity codes for exempt products**

You can also [use the lists of commodity codes \(https://www.gov.uk/government/publications/list-of-commodity-codes-that-need-individual-labels-in-phase-1-under-the-retail-movement-scheme\)](https://www.gov.uk/government/publications/list-of-commodity-codes-that-need-individual-labels-in-phase-1-under-the-retail-movement-scheme) to confirm which products are exempt from individual labelling.

The list of products that are exempt from individual labelling could change over time.

## Box labels

Where products are not individually labelled with the words 'Not for EU', you must label the box or crate.

It is recognised that businesses move products in different ways. This requirement should therefore be implemented in the most pragmatic way possible. For example:

- labelling shrink wrap that is not removed until products are unloaded at stores where appropriate, for example because products are not stored in boxes or crates
- labelling the cage if products are not stored in boxes, crates or shrink wrap
- you do not need to label the tray that protects products or prevents leakage if the box is labelled
- during transportation a cage can function as a box if it is a fully enclosed container until it arrives in Northern Ireland. This means that cages must be securely wrapped with tape with the words 'Not for EU' to function as 'boxes'

The government will continue to engage with retailers on the practical methods that can be used to meet this requirement.

## Labelling for retailer premises in Northern Ireland

Where products do not have an individual product label, retail premises in Northern Ireland must make sure there is appropriate visibility to customers in store that these goods are not to be sold in the EU.

These requirements apply to all retail establishments in Northern Ireland selling products that have entered under NIRMS.

Food products that do not have an individual product label and have moved under NIRMS should have shelf-level labels with the words 'Not for EU'.

Businesses may have a range of different ways of displaying and indicating the price of products and can take this into account when labelling a shelf. This can include:

- the individual price tag on the shelf
- a separate label next to the price tag on the shelf

The government will continue to engage with industry on the practical ways that these requirements can be met.

Retail premises must display posters in their stores, so that customers are aware that goods moved to Northern Ireland under NIRMS are intended for consumption in the UK and are not to be sold or consumed in the EU.

Posters may be in paper or digital format. Retail premises can create their own posters with the relevant information. The positioning and number of posters is at the discretion of individual stores. The government has provided poster templates that retailers may choose to use instead of creating their own.

Catering operators do not need to label shelves for food products that are intended to be eaten on the spot in Northern Ireland. This includes food products in a factory canteen, institutional canteen, catered event, hospital, prison or restaurant.

Retail premises are responsible for ensuring that these arrangements are in place.

## **30-day transition period**

The UK government recognises that there will already be products on the market in Northern Ireland when each new phase comes into effect. Therefore, there will be a 30-day transition period at the start of each phase. This means that goods that are already on the market will not need to be re-labelled and can be sold during the transition period.

After each transition period ends, relevant goods will need to be labelled with the words 'Not for EU' both on boxes and individual products in line with these requirements.

Phase 3 products that were moved into Northern Ireland before 1 July 2025 do not need an individual product label until 31 July 2025.

## **Technical requirements for the label**

The labels can be written, printed, stencilled, marked, embossed, impressed on or attached to the product, box or shelf. The labels can be adhesive labels (stickers) or sticky tape, but they must not be easily removable.

The label must be easy to see, clear to read and unlikely to fall off or be easily removed. It should not be hidden or covered by any other writing or

pictures.

On boxes, crates, and products, you can put the label anywhere. It can be incorporated into individual packaging as long as it does not cover any other required information.

You only need to label the outer packaging of a multipack.

Products should be marked in line with existing [labelling requirements](https://www.gov.uk/guidance/food-labelling-giving-information-to-consumers) (<https://www.gov.uk/guidance/food-labelling-giving-information-to-consumers>).

## Enforcing the requirements

Authorities will carry out risk-based and intelligence-led checks to ensure that these requirements are in place.

## Get help

Email [ni.trade@defra.gov.uk](mailto:ni.trade@defra.gov.uk) if you have questions about the new labelling requirements.

## England, Scotland and Wales: future labelling requirements for food products

Following consultation, the UK government did not proceed with the introduction of 'Not for EU' labelling in Great Britain on a mandatory basis from 1 October 2024.

We are developing legislation to apply 'Not for EU' labelling in Great Britain in the future, if it's needed to secure those supplies across the UK internal market. We will set out further information in due course.

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