

REKO - From producer to consumer, without middlemen

The REKO retail and distribution model gives customers a way of ordering products directly from the producer, with no need for middlemen. The REKO networks operate via Facebook as closed groups in which orders and deliveries are agreed on. For more information on REKO, visit www.trueflavours.fi.

REKO network = a closed Facebook group in which orders and deliveries are agreed on
REKO administrator = the person responsible for the technical administration of a REKO Facebook group

REKO operator = a company or individual selling products via a REKO network

REKO delivery = an event where REKO operators sell or deliver products ordered via a REKO network to customers, with agreement and notice handled via Facebook in advance (REKO deliveries may take place once a week, every other week, or at another suitable interval – each REKO network decides on the schedule independently)

The REKO administrator

(the person responsible for the technical administration of a REKO Facebook group)

- REKO administrators instruct REKO operators on how to learn REKO's procedures and about legal regulations on food (outlined below) that are relevant for REKO operators.
- REKO administrators are not retailers, so they are not responsible for food products sold via a REKO network: it is the REKO operator's responsibility to ensure that the product information is accurate, adequate, and in all other ways compliant with regulations.

Guidelines for REKO operators

(companies or individuals selling products via a REKO network)

- REKO operators are responsible for the sale of their products.
- REKO operators are responsible for the safety of their food products.
- Also, REKO operators are responsible for providing all the necessary food information (such as the list of ingredients, identification of substances that may affect those with allergies, and shelf life) and for ensuring that the information supplied is accurate.
- For packaged food products, that information must be provided in accordance with the EU's regulation on food information (Regulation No 1169/2011 of the European Parliament and of the Council; see <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32011R1169>), while the Finnish Ministry of Agriculture and Forestry's decree 843/2015, on provision of food information to consumers (see <http://www.finlex.fi/fi/laki/alkup/2014/20140834>, in Finnish), is applied to non-packaged food products. When applicable, the labelling requirements detailed in product-specific laws must be taken into account also. For packaged products to be sold in or otherwise delivered to bilingual municipalities, the labels must carry information at least in Finnish and Swedish, while for monolingual municipalities, that information need only be provided in the official language of the municipality in question.
- REKO operators must display the product information in the advertisement posted on the Facebook page either in the form of a product information list or as a link to their Web page where the relevant information is provided. Food information may also be included in the product file maintained by the REKO network's Facebook group, enabling customers to view it

when making a purchase. There may be some information that is subject to change, such as the use-by date, which the operator often cannot provide in advance, but all the necessary information must be given to the customer no later than when the products are delivered. The statutory packaging information must be available to the customer prior to purchase, and said information must be displayed in any material related to distance selling or provided through other suitable channels, which must be clearly indicated by the operator. All legally required information must be available to the customer at the time of the delivery. If non-packaged food products are advertised via a distance selling channel, such as Facebook, the information on these too must be made available.

- As a rule, the food information for packaged products must be displayed either on the package or on the package label. Food information for non-packaged products (including products packaged either at the customer's request or for immediate sale (the latter refers to products packaged and sold within a day) may, alternatively, be provided orally, on a placard, or in a brochure. Requirements pertaining to the provision of information specified in product-specific laws must be taken into account in addition. The main principle for the provision of food information is that the customer must not be given misleading information.

Direct sales of primary products (sale performed upon notification about the place of primary production)

- All direct sale of primary products must be mentioned in the notification about a place of primary production; it must indicate which products are going to be sold, where, and in what estimated quantities.
- Primary products include eggs; fish, either gutted on the fishing boat or ungutted; unskinned game; cultivated fruit, berries, vegetables, dried cereals, and mushrooms; honey; wild berries and mushrooms; and raw milk and colostrum.
- Producers may sell primary products directly to consumers in the quantities specified in Section 2 of Government Decree 1258/2011 when there has been notification about the place of primary production (see www.aitojamakuja.fi/suoramynti/alkutuotanto.php?v=alkutuotanto, in Finnish). This extends also to sales via REKO. Exception: raw milk or fresh colostrum shall be sold and handed over to a customer only on a dairy farm, and these products should not be transported as part of REKO deliveries.

If the annual direct sales exceed the limits set, the primary producer must submit a notification on food premises with regard to the direct sale of primary products. Information on the limits can be found in Finnish at

<http://www.aitojamakuja.fi/suoramynti/alkutuotanto.php?v=alkutuotanto> and in Government Decree 1258/2011.

- A notification on food premises must be submitted whenever the sale of domestic meat is planned (meat does not constitute a primary product, with the exception of unskinned game)
- When a notification on a place of primary production has been submitted, primary products may also be sold via REKO deliveries to customers who have not placed an order in advance, as long as the quantities remain below the limits specified in Section 2 of Government Decree 1258/2011.

- Product deliveries performed by the producer are covered by the notification on a place of primary production; no separate notification is required.
- REKO operators who transport primary products from other producers (except by passenger car) must obtain a professional-competence card.
- The form for notification about a place of primary production is available on the relevant municipality's website.
- For further information, visit www.aitojamakuja.fi/suoramyynti and follow the link 'alkutuotannon tuotteiden suoramyynti', to a Finnish-language PDF file on direct sales in primary production.

Manufacture and sale of food items (sale of food upon notification about food premises)

- Food-business operators are permitted to manufacture, sell, and transport food products via REKO networks if they have submitted a notification on food premises.
- Food-business operators who also sell products via REKO delivery to customers who have not placed an order in advance must register mobile food premises and submit a notification on sales to the food authorities of the municipality where the products are to be sold, at least four days prior to the REKO delivery. The form for notifying these authorities about mobile food premises is available on Finnish Food Safety Authority Evira's Web site. See www.evira.fi/portal/fi/tietoa+evirasta/lomakkeet+ja+ohjeet/elintarvikkeet/elintarvikehuoneistot/ (in Finnish).
- A food-business operator must have an up-to-date plan for internal checks that provides a description of the business's operations.
- Transport of food products falls within the scope of the above-mentioned plan, and notification on these products must be submitted in connection with the notification about food premises. In the transport of food products, it is of the utmost importance to ensure that the products remain at the correct temperature, for keeping the cold/hot chain intact.
- If a REKO operator transports perishable food products in a car / cold compartment for more than two hours and the transport is related to a sales event, the vehicle must be equipped with a recording temperature-monitoring system. Exception: If you transport food products directly to the customer or primary products away from the place of primary production, you do not require a recording temperature-monitoring system.
- REKO operators who transport food products from other producers (except by passenger car) must obtain a professional-competence card.
- The form for notification about food premises is available on the relevant municipality's website.
- For more information, visit www.aitojamakuja.fi/suoramyynti and follow the 'elintarvikkeiden valmistus ja myynti' link, to a Finnish-language PDF file on the preparation and sale of food products.

Private individuals:

- Private individuals are not obliged to submit a notification on food premises for the sale of low-risk products (such as baked goods that can be safely stored at room temperature or oven-baked Christmas casseroles) or a notification on a place of primary production for the

sale of excess vegetable or fruit items from their harvest. This does not exempt the food-business operator from the obligation to follow good hygiene practices and to provide the customer with information on ingredients, allergens, shelf life, and storage temperature, as required by the decree on food information.

- If, in contrast, a private individual produces perishable food products (such as fish and fish eggs, other seafood, meat and meat products, milk, cream, fresh cheese, and perishable baked goods such as filled sandwich loaves or gateaux) for sale, a standard notification on food premises must be submitted with regard to their manufacture and sale.
- Income from the sale of home-prepared food products constitutes taxable income, which must be declared to the Tax Administration with the pre-completed tax card. If the income exceeds 10,000 euros, the operations are regarded as business operations, for which value added tax is due. In this case, a notification on food premises must be submitted to report the manufacture and sale of food products.

Sources of further information:

The Decree of the Ministry of Trade and Industry on the Labelling of Foodstuffs

<https://www.evira.fi/en/foodstuff/manufacture-and-sales/food-information/labelling/>
www.finlex.fi/fi/laki/alkup/2014/20140834 (for Finnish content)

Allergens

www.evira.fi/portal/fi/elintarvikkeet/tietoa+elintarvikkeista/pakkausmerkinnat/allergisoivat+ainesosat/ (information in Finnish)

Notification on food premises

www.evira.fi/portal/fi/elintarvikkeet/valmistus+ja+myynti/elintarvikehuoneistot+/ilmoitetut+elintarvikehuoneistot/ (in Finnish)

Mobile food premises

www.evira.fi/portal/fi/elintarvikkeet/valmistus+ja+myynti/elintarvikehuoneistot+/ilmoitetut+elintarvikehuoneistot/liikkuvat+elintarvikehuoneistot/ (in Finnish)

Taxation

<https://www.vero.fi/en/>

Sale and manufacture of low-risk products

www.aitojamakuja.fi/suoramyynti

Professional-competence cards

<https://www.trafi.fi/en>

The local food co-ordination project (run by Brahea Centre at the University of Turku) has prepared these REKO guidelines. This effort involved a working group with representatives from Finnish Food Safety Authority Evira, the Ministry of Agriculture and Forestry, the Central Union of Agricultural Producers and Forest Owners (MTK), the Swedish-language organisation for agricultural producers (SLC), and the Rural Women's Advisory Organisation.

Further information is available on the Web site www.aitojamakuja.fi, under 'REKO'.

