



The Reg Tech Tool[®]

Resolving Regulatory Pain Points

Presented by **Lee Gray**
Business Development Director

For ecommerce, the most important thing is trust.

Jack Ma



amazon

2.3M
Active Sellers

353M
Products

2.5M
Price
Changes

60
Federal
Lawsuits



Food Supplements are a restricted product category on Amazon, all ASINs must demonstrate compliance with all laws and regulations of Europe and of local countries prior to launch.



To successfully List on Amazon.co.uk, Amazon.de, Amazon.es, Amazon.nl, Amazon.fr, Amazon.it you must provide:



- Evidence of FIC (Food Information to Consumer) compliant labels
- Adherence to country-specific rules on compositional standards
- Responsible Food Business Operator (FBO) in the UK and Europe



- Evidence of Pre-market notifications



- Food Safety certificate from a GFSI (Global Food Safety Initiative)-certified scheme OR a HACCP (Hazard Analysis and Critical Control Point) certificate certified by a 3rd party.

| Requirement | | UK | DE | FR | IT | ES | NL |
|-------------|---|----|----|----|----|----|----|
| Pre-launch | Evidence of pre-market notification | | * | ✓ | ✓ | ✓ | |
| | Third party certified Hazard Analysis and Critical Control Points (HACCP) or Global Food Safety Initiative (GFSI) certification | ✓ | ✓ | | | | ✓ |
| | FIC compliant packaging artworks and detail page content** | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| Post-launch | Compliant with Restricted Product rules e.g. medicinal ingredients, tolerable upper levels | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |
| | FIC compliant packaging artworks and detail page content | ✓ | ✓ | ✓ | ✓ | ✓ | ✓ |

*Not currently required by Amazon but is a legal requirement.

**Doesn't exempt the product from post-launch FIC assessment.

Third party certified Hazard Analysis and Critical Control Points (HACCP) or Global Food Safety Initiative (GFSI) certification

- Non-GFSI recognized certification schemes (GMP, MHRA etc).
 - **Scope of audit doesn't include format of product.**
 - Certification is out of date.
- HACCP certified by non-Amazon recognised company.

FIC compliant packaging artworks and detail page content

- Failure to upload mandatory text fields e.g. ingredients.
- Poor image quality. All mandatory copy must be legible.
 - Missing images. Should display all mandatory text.
- Misinterpretation of health claims e.g. thiamine = thyroid.

Compliant with Restricted Product rules e.g. medicinal ingredients, tolerable upper levels

- Misclassification of product. Make it as clear as possible that the product is a food supplement.
 - **Lack of nuance with Amazon's controls e.g. 5-HTP.**



The Reg Tech Tool™

A self-serve solution which helps Food Supplement brands scale internationally with ease, removing regulatory friction.

**CHECK A
CONCEPT**

**CHECK A
FORMULATION**

**CHANGE
MANAGEMENT**

Need
state

Health
claims

Minimum
dosage

Maximum
dosage

Upload
formulation

Select target
markets

Check for
compliance

Create
international
pack copy

Upload
formulation

RASFF
notifications

Regulatory
change
notifications



Thank You.

info@rubicon-bridge.com