



Creating Legal Labelling

For Healthy Food & Drink
Products

Interreg
Atlantic Area
European Regional Development Fund



CAHSES
Coastal and Aquaculture Health and Food Safety

Module Contents

1

Scope of the Training Module	P4
Introduction to Food Labelling Regulations	P6
Legal requirements for Food Packaging	P10
Name of the Food	P11
List of Ingredients	P12
Allergens	P14
QUID	P17
Date Marking	P20

2

Special Conservation Conditions	P23
Name and Address of Food Operating Business	P24
Country of Origin and Place of Provenance	P26
Clarity and Field of Vision	P27
Font Sizes	P28
Alcoholic Strength	P30
Traceability and Labelling	P31
Specific Food Labelling Regulations	P32

Module Contents

3

Legally Required Nutritional Information	P33
Discretionary Nutritional Information and Exemptions	P34
Presenting Nutritional Information on Your Packaging	P35
Making Product Nutrition and Health Claims	P37
Nutrition Labelling Systems	P39
Establishing Nutritional Labelling	P42

4

Legislation for Claims Goes Beyond Packaging	P44
Updating Your labelling	P45
Voluntary Statements, Marketing Terms and Logos	P46
Labelling and Symbols	P47
Labelling and Vegan Products	P48
Organic Labelling	P49

Scope of this Training Module

Ensuring that the products which you bring to market are **labelled correctly** is a **fundamental legal duty** of every food producer.

This module seeks to highlight some of the key areas in which your labels will need to comply with EU and UK legislation.

It is not an exhaustive source of information, and **you are recommended to seek expert advice** before printing your packaging and bringing your products to market.

The **requirements for compliance to legal labelling standards varies around the world**, so you should always **seek advice from an authoritative and reliable source** with a comprehensive knowledge of local market requirements when preparing your product labels for export.



Getting the Best from this Training Module

To gain the best outcomes from this training module you may wish to use the information it provides in conjunction with previous AHFES training modules.

Some modules that you may find useful include :

[P1-M7 Legal Aspects of Development](#)

[P3-M5 Pack Design](#)

[P5-M2 Defining Product Attributes](#)

[P5-M6 Conducting Effective Production Trials](#)

[P5-M7 Product Testing in the Development Process](#)

Food Labelling

Food labelling is essential to ensure food safety and to allow consumers to have access to a balanced diet.



- The **label** of a food product is its **identity card**
- Considering the wide range of products currently on the market, the consumer must be well informed to allow them to **make more conscious and appropriate food choices**.
- A fundamental principle underlying all food labelling legislation is that any such labelling must never mislead the consumer in any way.

Labelling Requirements for Packaged Foods

Food labelling in European Union are regulated by the **Regulation (EU) No. 1169/2011**. The EU Regulation (as it existed on 31 December 2020) was incorporated into UK legislation. For the sale of products in the UK, the labelling rules have remained the same but are now UK-based. In the future, there may be changes implemented by the UK leading to divergence from the EU rules.

This regulation lays the groundwork for guarantee high consumer protection concerning food information.

It lays down the **general principles, requirements and responsibilities** for providing **information** and, in particular, the labelling of foodstuffs. It guarantees consumers' right to information and procedures for food information. This regulation makes nutrition labelling mandatory in all states member of the European Union and the UK.



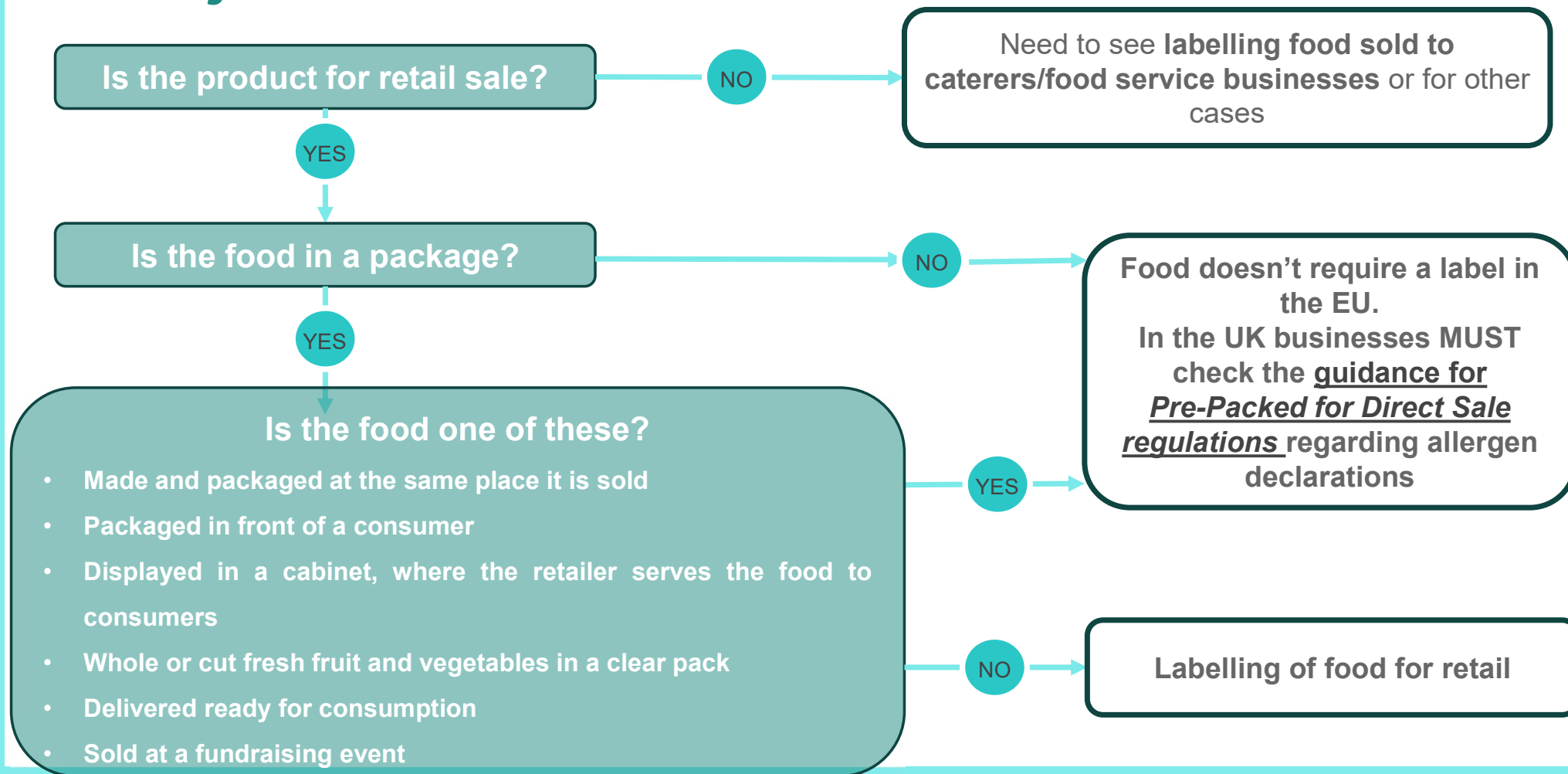
Slide 7

AH0

I will need to add in references to UK legislation for Wales & explain NI situation

Alison Haselgrove, 2022-03-22T13:38:53.177

Does My Product Need a Label?



Slide 8

AH0

I will need to mention the new UK Pre-Packed for Direct Sale legislation

Alison Haselgrove, 2022-03-22T13:41:00.540

What Is Required of Your Label?













Be easy to read

Be written in official language

Have the right information to meet the rules of the codes

Be part of or attached to the food

Legal Requirements for Food Packaging

- 1  Name of the Food
- 2  Ingredient List
- 3  Ingredients or Technological Aids or Derivatives of a Substance or Product that cause Allergies or Intolerances
- 4  Quantity of Certain Ingredients or Categories of Ingredients
- 5  Net Amount of Foodstuff
- 6  Date Marking
- 7  Special Conservation Conditions and/or Conditions of Use
- 8  Name or Business Name and Address of the Food Business Operator
- 9  Country of Origin or Place of Provenance
- 10  Mode of Employment/ Usage
- 11  Alcoholic Strength
- 12  Nutritional Declaration



Name of the Food

The denomination of foodstuffs must respect **some criteria**, listed below:

- A Legal denomination (name) or, in the absence of that, a current denomination or a descriptive denomination must be applied;
- It cannot be replaced by a name protected by intellectual property rights, a trademark or by a fancy denomination;
- It must include or be accompanied by an indication of the physical state in which the food is found or the treatment specific to which it was subjected (e.g. powdered, pre-frozen, lyophilized (freeze dried), deep-frozen, concentrated, smoked), when the omission of this indication is liable to mislead the purchaser;
- The Regulation (Annex VI) contains specific information accompanying the name of certain foodstuffs.



List of Ingredients

- This list must include or be preceded by an appropriate heading, consisting of the term “Ingredients” or that which includes it;
- You must list all the ingredients of the food, in descending order of weight at the time of use or the percentage present on the product;
- The Regulation (Annex VII) contains indications for the designation of ingredients.
- There are specific criteria for the list of ingredients, and consideration should be given that it is not required for some food groups and is not mandatory for others.



Examples of Where Ingredients' Lists are Not Required or Not Mandatory

Ingredient's List - Not Required

- Fresh fruit and vegetables, including potatoes, that have not been peeled, cut or otherwise treated;
- Fermentation vinegars, when they come exclusively from a single basic product, and provided that no other ingredient has been added to them;
- Packaged water;
- Standardised alcoholic beverages

Ingredient's List - Not Mandatory

- Food additives and enzymes:
 1. the presence of which in a given foodstuff is solely due to the fact that it is contained in one or more ingredients of that foodstuff, in accordance with the principle of transfer referred to in Article 18(1). 1(a) and (b) of Regulation (EC) No . 1333/2008, and provided that they do not have any technological function in the finished product, or
 2. that are used as technological aids;

Ingredients or Technological Aids or Derivatives of a Substance or Product that cause Allergies or intolerances

Ingredients or processing aids that cause allergies or intolerances - allergens, used in the manufacture or preparation of a foodstuff and which continue to be present in the finished product, even in an altered form:

- They must be indicated in the list of ingredients;
- The name of the substance must be highlighted by a spelling that clearly distinguishes it from the rest of the list of ingredients (e.g. the letter must be in bold or capital letters or a different color)

Cereals containing gluten	Crustacea and products of these	Eggs and egg product	Fish and fish products	Peanuts, soybeans	Milk and milk products	Tree nuts and nuts products	Sulphite in concentrations of 10mg/kg or more
	Molluscs & products of these	Soya beans & Soy products	Celery	Mustard	Lupin	Sesame Seeds	

- The Regulation (Annex II) indicates the substances or products that cause allergy - Substances or products that cause allergies or intolerances.
- See our [training module P1-M7](#) for more information about allergens



Slide 14

AH0

I think we might be safer to state all 14 declarable allergens - we could use the slides we have in P1-M7 ?

Alison Haselgrove, 2022-03-22T13:38:06.238

14 Declarable Allergens



Celery

This includes celery stalks, leaves, seeds and the root called celeriac.

You can often find celery in celery salt, salads, some meat products, soups and stock cubes



Cereals containing gluten

Wheat (such as spelt, Khorasan wheat, Kamut), rye, barley and oats. Often found in foods which contain flour, such as breadcrumbs, bread, cakes, batter, couscous, meat products, pasta, pastry, some baking powders, sauces, soups and fried foods which are dusted with flour.



Crustaceans

Crabs, lobster, prawns and scampi are crustaceans.

Shrimp paste, often used in Thai and south-east Asian curries or salads, is an ingredient to look out for.



Eggs

Eggs are often found in cakes, some meat products, mayonnaise, mousses, pasta, quiche, sauces and pastries or foods brushed or glazed with egg.



Fish

You will find this in some fish sauces, pizzas, relishes, salad dressings, stock cubes and Worcestershire sauce.



Lupin

Although lupin is a flower, it is also used to make flour.

Lupin flour and seeds can be used in some types of bread, pastries and even in pasta.



Milk

Milk is a common ingredient in butter, cheese, cream, milk powders and yoghurt.

It can also be found in foods brushed or glazed with milk, and in powdered soups and sauces.

14 Declarable Allergens



Molluscs

These include mussels, land snails, squid and whelks, but can also often be found in oyster sauce or as an ingredient in fish stews



Mustard

Liquid mustard, mustard powder and mustard seeds fall into this category.

This ingredient can also be found in breads, curries, marinades, meat products, salad dressings, sauces and soups.



Nuts

Nuts which grow on trees, like cashew nuts, almonds and hazelnuts.

You can find nuts in breads, biscuits, crackers, desserts, nut powders (often used in Asian curries), stir-fried dishes, ice cream, marzipan (almond paste), nut oils and sauces



Peanuts

Peanuts are actually a legume which grow below ground, which is why it's sometimes called a groundnut. Peanuts are often used as an ingredient in biscuits, cakes, curries, desserts, sauces (such as satay sauce), as well as in groundnut oil and peanut flour.



Sesame Seeds

These seeds can often be found in bread (on hamburger buns for example), breadsticks, houmous, sesame oil and tahini.

They are sometimes toasted and used in salads.



Soya

Often found in bean curd, edamame beans, miso paste, textured soya protein, soya flour or tofu.

Soya is a staple ingredient in oriental food. It can also be found in sauces, desserts, ice cream, meat products, and vegetarian products.



Sulphur dioxide (Sulphites)

Often used in dried fruit such as raisins, dried apricots & prunes. Also used in meat products, soft drinks, vegetables as well as in wine and beer. If you have asthma, you have a higher risk of developing a reaction to sulphur dioxide.

QUID (Quantitative Ingredient Declaration)

QUID stands for **Quantitative Ingredient Declaration**.

In certain circumstances it is **necessary to state on the label the quantity, in percentage terms, of an ingredient or category of ingredients** used in the manufacture or preparation of a foodstuff particularly if an ingredients is emphasised on the labelling in words, pictures or graphics on the pack .

See the next slide for more details.

- The requirement to indicate **QUID does not apply** to foods consisting of a **single ingredient** as the quantity of single ingredients will in all cases correspond to 100 %.
- There are **other specific cases of prepacked foods where the QUID is not required** (Annex VIII of the Regulation). Furthermore, the QUID is not required on 'non-prepacked foods' (foods which are offered without pre-packaging, or are packed on the sales premises at the consumer's request or prepacked for direct sale) unless Member States have adopted national rules requiring it for such foods

AH0



Slide 17

AH0

Might be good if we change the pictures to show some Quidde labels ? Maybe the partners photograph an example for each country ?

Alison Haselgrove, 2022-03-22T13:44:43.311

When QUID is Mandatory

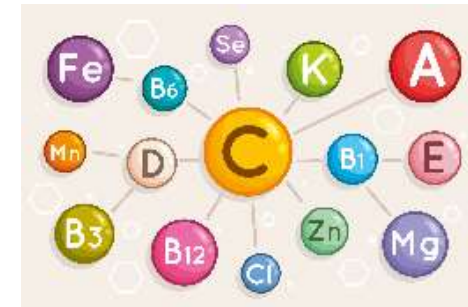
It is **mandatory** in cases where the ingredient or category of ingredients:

- It appears in the name of the foodstuff, or may induce the consumer to **associate it with its name**;
- Be **highlighted on the label** by words, by images, or by a graphic representation;
- It is **essential** to characterise a foodstuff and to distinguish it from products with which it can be confused, due to its denomination or appearance;
- The **Regulation (Annex VII)** sets out the rules for the quantitative indication of nutrients.



Net quantity of foodstuff :

- Expressed, as the case may be in litre, centiliter, milliliter, kilogram or gram;
- Units of volume must be used for liquids and units of mass for other products;
- The **Regulation (Annex IX)** defines rules for the indication of the net quantity.



Examples of Declaring QUID

The QUID tells a customer the percentage of particular ingredients contained in a food product.

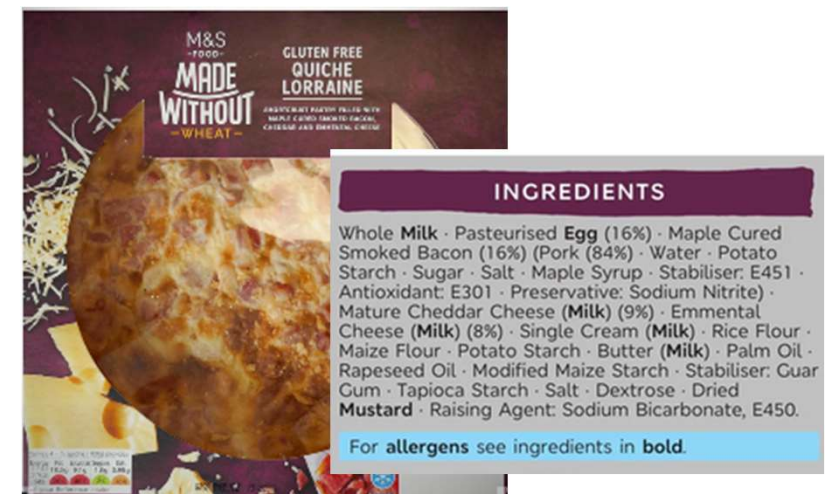
You must show a QUID if the ingredient:

- is **in the name of the food** (for example, the 'blackberry' and 'apple' in a blackberry and apple pie)
- is **usually associated with that name** by the consumer (for example 'milk or cheese' in a quiche)
- is **emphasised by words, pictures or graphics** on the label (for example, if there's a picture of blackberries on the label)
- **characterises a food and distinguishes it** from products with a similar name or appearance - for example, a lasagne made with pork must show the QUID for the pork because it **characterises the product and distinguishes it** from a lasagne which usually made with beef is.



Ingredients

INGREDIENTS: Bramley Apple and Blackcurrant Filling (48%) (Sugar, Diced Bramley Apples (16%), Blackcurrants (12%), Bramley Apple Purée (11%), Humectant: Vegetable Glycerine, Blackcurrant Purée (4.5%), Glucose Syrup, Dextrose, Cornflour, Acids: Adipic Acid, Citric Acid, Preservatives: Potassium Sorbate, Sodium Metabisulphite (Sulphites), Sulphur Dioxide, Fortified Wheat Flour (Wheat Flour), Calcium Carbonate, Iron, Nicotin, Thiamin, Vegetable Oils (Rapeseed, Palm), Glucose Syrup, Sugar, Salt, Dextrose, Preservative: Potassium Sorbate.



Date Marking

Key questions for designing the date marking regulations include

Which food products must have date marking?

Will the date mark be used to convey whether a food is safe to consume?

Will the date mark be used to inform the consumer that the quality of the food may deteriorate after the date, but it is still possible to consume the product safely?

What is the recommended range of date marks admissible in the country?

What should be the recommended language/terminology to present the date mark and what is the recommended format?

What are importing countries' requirements for food export from the country?

Date Marking

Date of Manufacture

Means the date on which the food becomes the product as described.
This is not an indication of the durability of the product.

Date of

Means the date on which the food is placed in the immediate container in which it will be ultimately sold.
This not an indication of the durability of the product

Best Before

Means the date which signifies the end of the period, under any stated storage conditions, during which the unopened product will remain fully marketable and will retain any specific qualities for which implied or express claims have been made.
However, beyond the date the food may still be acceptable for consumption.

Use-by Date

Means the date which signifies the end of the period under any stated storage conditions, after which the product should not be sold or consumed due to safety and quality reasons.

Use-by Date

- The Regulation (EU) N° 1169/2011 (Annex X) contains all the information for the proper indication of the date.

The indication of the minimum durability date **is not required** in the following cases:

- Fresh fruit and vegetables, including potatoes, that have not been peeled, cut or otherwise treated;
- Wines, liqueur wines, sparkling wines, aromatised wines and similar products obtained from fruit other than grapes, and beverages falling within CN code 2206 00 obtained from grapes or grape must;
- Beverages with an alcoholic strength by volume of 10% or more;
- Bakery or pastry products which, by their nature, are normally consumed within 24 hours after manufacture;
- Vinegars;
- Cooking salt;
- Sugars in the solid state;
- Confectionery products composed almost exclusively of flavoured and/or coloured sugars;
- Chewing gum and similar products for chewing.

Special Conservation Conditions and/or Conditions of Use



If the foodstuffs require special storage and/or use conditions, instructions must be provided of use and conservation after opening the package, namely the period of consumption, when appropriate.

For example, in yoghurts - "Keep between 0°C and 6°C", because they deteriorate if kept at room temperature



Name and Address of the Food Business Operator

The following responsibilities apply to Food Business operators within the EU :

- The food business operator responsible for food information must be **the operator under whose name or trade name the food is marketed**, or if that operator is not established in the European Union, **the importer for the Union market**.
- Those who are responsible for food information shall **ensure the presence and accuracy of the information** in accordance with applicable food information legislation and the requirements of relevant national provisions.
- Food business operators must ensure, in businesses under their control, that information on non-prepackaged food intended for the final consumer or catering establishments is **transmitted to the food business operator** that receives such foodstuffs, so that, when requested, the mandatory information can be provided to the final consumer.



Slide 24

AH0

I will add UK law for Wales

Alison Haselgrove, 2022-03-22T13:41:28.978

Name and Address of the Food Business Operator

The UK Government outline the following responsibilities as they apply to Food Business operators within the UK and Northern Ireland :

Show the name and address of the food business operator

You **must include** a business name and address on the packaging or food label of pre-packed food products. This must be either:

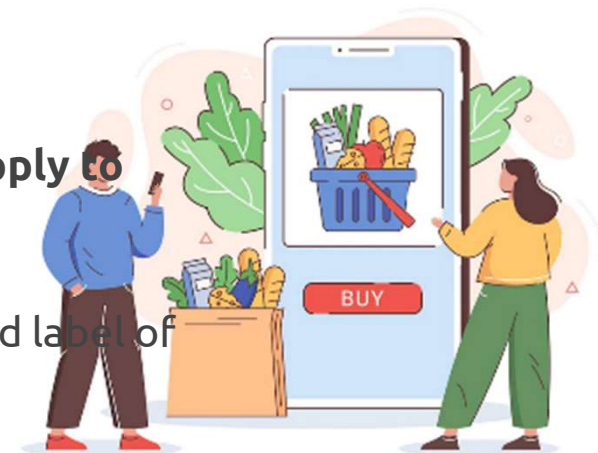
- the name of the business whose name the food is marketed under
- the address of the business that has imported the food

Pre-packaged food or caseins sold in NI must include a NI or EU FBO address. If the FBO is not in NI or EU, include the address of your importer, based in NI or the EU.

You can continue to use an EU, GB or NI address for the FBO on pre-packaged food or caseins sold in GB until 30 September 2022.

From 1 October 2022, pre-packaged food or caseins sold in GB must include a UK address for the FBO. If the FBO is not in the UK, include the address of your importer, based in the UK.

The address needs to be a physical address where your business can be contacted by mail. You cannot use an email address or phone number.



Country of Origin or Place of Provenance

Country of origin or place of provenance when provided for in article 26 of regulation (EU) 1169/2011 says that the mention of the country or place of provenance is mandatory as follows:



- Whenever the omission of this indication is likely to mislead the consumer as to the country or place of actual origin of the food;

If the country of origin, or the place of provenance of the food, is indicated and is not the same as its primary ingredient, alternatively, it should be stated that the country of origin, or the place of provenance of the primary ingredient, is different the country of origin, or the place of provenance of the food;

- For example, if a “Texan BBQ Sauce” product displays a flag of the USA on the label design, but is not made in the USA, then a country of origin statement is required.
- Regulation (Annex XI) establishes the types of meat for which this mention is mandatory.
- Full guidance on labelling meat, fish and seafood for UK businesses is provided by the [UK Government here](#) and guidance on when origin and provenance labelling is need to avoid misleading the consumer is [here](#).

Slide 26

AH0

Sorry but I don't understand this phrase ?

Alison Haselgrove, 2022-03-22T13:42:04.057

Clarity and Field of Vision required for On Pack Information

Information on labels must be **indelible and difficult to remove**, to ensure it remains legible throughout the product's life.

The concept of "field of vision" applies to the following information

- the **net quantity** of the food (e.g. the weight or volume)
- **alcoholic strength** by volume (for drinks containing over 1.2% alcohol)

this means that the customer **must be able to see** all the following information **at the same time as the name** of the food

It is good practice for business to ensure that their food labels are **clear and easy to read**, including showing sensitivity towards people with sight difficulties when choosing their **overall pack designs** and in particular **contrasts of colour** between the text and background of the design.



Slide 27

AH0

Please could we translate this chart into English ? Happy to help if you like ?

Alison Haselgrove, 2022-03-22T13:42:43.714

Font Sizes required for On Pack Information

All the **mandatory information** on a label **must be printed** using a font with a **minimum x-height of 1.2 millimetres**.

See “6” in the diagram which illustrates how the x-height must be 1.2 millimetres.

If the largest surface area of packaging is **less than 80cm squared**, you can use a minimum x-height of 0.9mm

x-HEIGHT



Legend

1	Ascender line
2	Cap line
3	Mean line
4	Baseline
5	Descender line
6	x-height
7	Font size

Source : [gov.uk](https://www.gov.uk)

Summary of Font Sizes required for On Pack Information

Item	Larger Surface				Net Amount
	$\geq 80\text{cm}^2$	$< 80\text{cm}^2$	$< 25\text{cm}^2$	$< 10\text{cm}^2$	$< 5\text{g}/5\text{ml}$
Font Size (X height)	1,2 mm	0,9 mm	0,9 mm	0,9 mm	-
A) Legal or current or descriptive name	Yes	Yes	Yes	Yes	-
B) Ingredients list	Yes	Yes	Yes	No*	-
C) Allergens	Yes	Yes	Yes	Yes	-
D) QUID of certain ingredients	Yes	Yes	Yes	No	-
E) Net quantity	Yes	Yes	Yes	Yes	No
F) Minimum durability date/Consumption limit date	Yes	Yes	Yes	Yes	-
G) Special storage conditions/use conditions	Yes	Yes	Yes	No	-
H) Operator name and address	Yes	Yes	Yes	No	-
I) Country of origin or place of provenance (when required)	Yes	Yes	Yes	No	-
J) Instruction for use	Yes	Yes	Yes	No	-
K) Alcohol content ($> 1.2\%$ vol)	Yes	Yes	Yes	No	-
L) Nutritional declaration	Yes	Yes	Yes	No	-

Note 1: a), e), and k) must appear in the same visual field

Note 2: a), f), g), and h) must appear on the outer packaging in which the pre-packaged products are presented for marketing

Note 3: other exemptions for nutrition declaration are indicated in Annex V of the regulation. This information must be provided by other means or made available at the consumer's request.

Alcoholic Strength Labelling



Labelling for **Alcoholic drinks** must state

- the **number of standard drinks**,
- **alcohol by volume (% Alc/Vol)** and
- a **pregnancy warning** label.

Any **other food** requires

- a % Alc/Vol statement when it contains more than 1.15% Alc/Vol (alcohol by volume)

Traceability and Labelling

The purpose of food labeling is to provide consumers with relevant information, facilitating their choices and protecting them against unfair or misleading practices.

Traceability labelling can be used to improve the reliability of food labeling and its credibility with consumers as they can understand the history of a product without the need to carry out in-depth research.

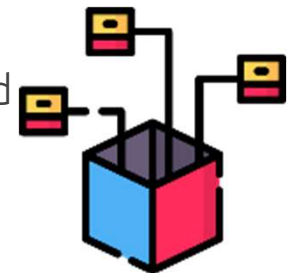


Equally important, by allowing the identification of products and tracing its supply chain, the traceability system facilitates the control of the authenticity and truthfulness of the labelling, as well as the preservation of the identity of specific products.



Traceability systems often use a “Batch code” or “Lot Number” which is linked to the manufacturer’s production records and is printed onto a specific pack to denote when it was produced.

This allows each individual pack to be traced back to the batch at which it was produced, and from that point its records should be linked to a wide range of information such as the ingredients and packaging batches used and the processing and packing lines on which it was produced.



This guarantees that if there is a problem with the product in question, any product recall is made efficiently, and the competent authorities can act more effectively, enhancing the safety of consumers and confining stock losses only to batches affected by the problem.

Specific Food Labelling Regulations

There are specific regulations in labelling, in some situations, specifically for: allergens, packers, storage conditions and consumer information

For allergens, the regulation is defined in Regulation (EU) No. 1169/2011, annex II. It defines the following:

If present in the food, allergens must be visible and highlighted in the ingredient list.

Allergen reporting requirements also cover non-prepackaged food, including food sold in restaurants and

304/18 EN Official Journal of the European Union 22.11.2011

For
leg

REGULATION (EU) No 1169/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2011

on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004

(Text with EEA relevance)

y attention I on of national



For UK Businesses, the
[FSA provide guidance here](#)

Legally Required Nutritional Information

The inclusion of nutritional information on your finished product label is a **legal requirement** in the many countries around the world, including the European Union and the United Kingdom.

When providing nutrition information, you are **legally required to declare 7 pieces of information** on the product's packaging.

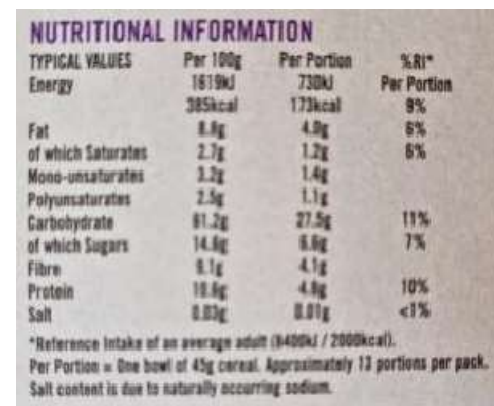
These are :

- **Energy value** – which is expressed as a calorie content in **kcal**s (an abbreviation for kilocalories, and also in **kJ** (which is short for **kilojoules**).
- A kilocalorie is another word for what's commonly called a calorie, so 1,000 calories will be written as 1,000 kcal.
- Kilojoules are the metric measurement of calories.

- Amounts of
 - **Fat**
 - **Saturated fat**
 - **Carbohydrate**
 - **Sugars**
 - **Protein**

This information, which is commonly displayed on the back or side of packaging must be declared as **per 100g or 100ml of the product**.


However many brands also choose to display information calculated **per portion** to be more helpful to consumers.



NUTRITIONAL INFORMATION

TYPICAL VALUES	Per 100g	Per Portion	%RI*
Energy	1619kJ	730kJ	8%
	385kcal	173kcal	8%
Fat	8.8g	4.0g	6%
of which Saturates	2.7g	1.2g	6%
Mono-unsaturates	3.2g	1.4g	
Polysaturates	2.5g	1.1g	
Carbohydrate	61.2g	27.5g	11%
of which Sugars	14.8g	6.6g	7%
Fibre	9.1g	4.1g	
Protein	10.8g	4.8g	10%
Salt	0.03g	0.01g	<1%

*Reference Intake of an average adult (8400kJ / 2000kcal).
Per Portion = One bowl of 45g cereal. Approximately 13 portions per pack.
Salt content is due to naturally occurring sodium.



Información nutricional (producto preparado)
Declaração nutricional (produto preparado)

	Por 100 g	1 Porción / 1 Porção (60 g)**	%
Valor energético/Energia	1475 kJ/ 349 kcal	885 kJ/ 209 kcal	10 %
Grasas / Lípidos	3,0 g	1,8 g	3 %
- de las cuales saturadas			
- dos quais saturados	0,5 g	0,3 g	2 %
Hidratos de carbono	53,0 g	31,8 g	12 %
- de los cuales azúcares			
- dos quais açúcares	1,5 g	0,9 g	1 %
Proteínas	23,0 g	13,8 g	28 %
Sal	0,08 g	0,05 g	<1 %

Examples of Nutritional Information in **tabular format** per 100g and per portion

Discretionary Nutritional Information & Exemptions

Discretionary Nutritional Declarations

If you wish to do so, the content of the mandatory nutrition declaration **can be supplemented** with an indication of the amounts of one or more of the following:

- **Monounsaturated Fat**
- **Polyunsaturated Fat**
- **Polyols**
- **Starch**
- **Fibre**
- **Certain vitamins or minerals** present in significant amounts as outlined in Regulation 1169/2011 - Part A of Annex XIII

Foods which are Exempt from Nutritional Declarations

There are certain foods which are **exempt** from this nutritional declaration requirement. Details of these can be found in Annex V to the Food Information to Consumers (EU) Regulation N. 1169/2011. Exemptions relate mainly to **minimally processed foods** and those with **little nutritional value** for example a herb, water or salt. Food directly supplied by manufacturer of small quantities of products to the final consumer or to local retail establishments directly supplying the final consumer is also exempt under Annex V point 19.

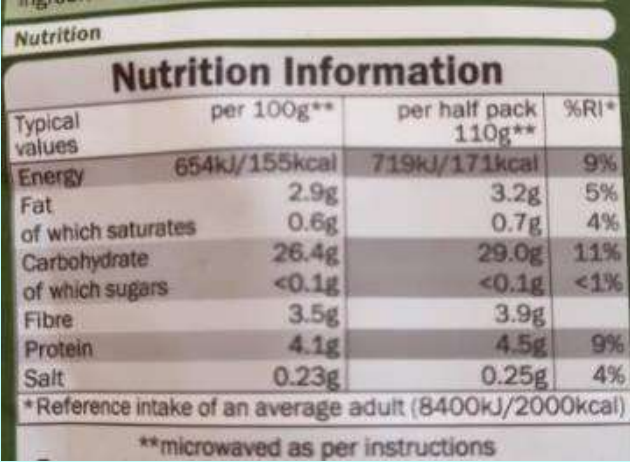
Nutrition	per 100g	per burger	% adult RI per burger
Typical values (grilled)			
Energy kJ	574	976	
Energy kcal	136	232	10%
Fat	3.8g	6.5g	8%
of which saturates	2.3g	4.0g	17%
- mono-unsaturates	1.0g	1.7g	-
- polyunsaturates	<0.1g	0.2g	-
Carbohydrate	1.7g	2.9g	1%
of which sugars	<0.5g	0.9g	1%
- starch	<0.5g	<0.5g	-
Fibre	<0.5g	0.9g	-
Protein	23.6g	40.1g	67%
Salt	0.73g	1.24g	17%

Example of Nutritional Information showing **mandatory and optional nutrients** declared

Presenting Nutritional Information on Your Packaging

The information must be **presented and expressed in specifically defined ways** – these include

- in a **tabular format** with the **numbers aligned**
- **where space does not permit**, the declaration may appear in **linear format**
- energy value must be expressed in **kilojoules (kJ)** and **kilocalories (kcal)**
- the amount of the nutrients must be expressed in **grams (g)**
- all elements must be included **next to each other**. The elements must be presented together **in a clear format** and, where appropriate, in the order of presentation provided for in Annex XV to EU FIC.
- nutrition information must be expressed **per 100 g/ml**, using the measurement units specified in Regulation 1169/2011
- vitamins and minerals must be expressed per 100g/ml and as a percentage of the reference intake (RI)

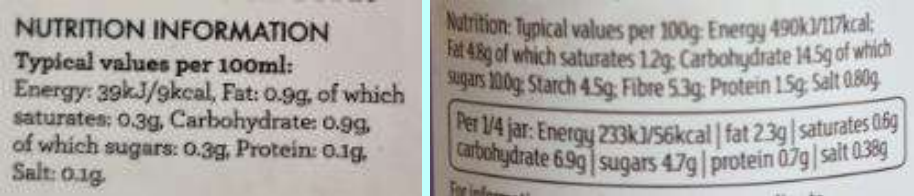


A photograph of a product's nutrition label. The label is titled 'Nutrition Information' and is presented in a clear, tabular format with three columns: 'Typical values', 'per 100g**', and 'per half pack 110g**'. A fourth column, '%RI*', is also present. The rows list various nutrients: Energy, Fat, of which saturates, Carbohydrate, of which sugars, Fibre, Protein, and Salt. The values are aligned to the right within each column. At the bottom, there are footnotes: '*Reference intake of an average adult (8400kJ/2000kcal)' and '**microwaved as per instructions'.

Typical values	per 100g**	per half pack 110g**	%RI*
Energy	654kJ/155kcal	719kJ/171kcal	9%
Fat	2.9g	3.2g	5%
of which saturates	0.6g	0.7g	4%
Carbohydrate	26.4g	29.0g	11%
of which sugars	<0.1g	<0.1g	<1%
Fibre	3.5g	3.9g	
Protein	4.1g	4.5g	9%
Salt	0.23g	0.25g	4%

*Reference intake of an average adult (8400kJ/2000kcal)
**microwaved as per instructions

Example of Nutritional Information in **tabular format** per 100g and per half pack portion



Two photographs of product labels showing nutritional information in linear format. The left label is titled 'NUTRITION INFORMATION' and lists 'Typical values per 100ml:' followed by Energy, Fat, of which saturates, Carbohydrate, of which sugars, Protein, and Salt. The right label is titled 'Nutrition: Typical values per 100g:' and lists Energy, Fat, of which saturates, Carbohydrate, of which sugars, Starch, Fibre, Protein, and Salt. Below this, it provides values for 'Per 1/4 jar:' for Energy, fat, saturates, carbohydrate, sugars, protein, and salt.

NUTRITION INFORMATION	
Typical values per 100ml:	
Energy:	39kJ/9kcal
Fat:	0.9g, of which saturates: 0.3g
Carbohydrate:	0.9g, of which sugars: 0.3g
Protein:	0.1g
Salt:	0.1g

Nutrition: Typical values per 100g:	
Energy	490kJ/117kcal
Fat	4.8g of which saturates 1.2g
Carbohydrate	14.5g of which sugars 10.0g
Starch	4.5g
Fibre	5.3g
Protein	1.5g
Salt	0.80g

Per 1/4 jar:	
Energy	233kJ/56kcal
fat	2.3g saturates 0.8g
carbohydrate	6.9g sugars 4.7g protein 0.7g salt 0.38g

Examples of Nutritional Information in **linear format** per 100ml, per 100g and per portion

Types of On Pack Claims



- There are different types of claims, as listed below:
- “claim” means any message or representation, not mandatory under EU Community or national legislation, including any pictorial, graphic or symbolic representation, in whatever form, that declares, suggests or implies that a food has particular characteristics;
- “Nutrition claim” means any claim that states, suggests or implies that a food has particular beneficial nutritional properties because of the energy (caloric value) it provides, provides at a reduced or increased value, or does not provide, and the nutrients or other substances it contains, contains in reduced or increased proportion, or does not contain;
- “Health claim” means any claim that states, suggests or implies the existence of a relationship between a category of food, a food or one of its constituents and health;
- “Claim to reduce a disease risk” means any health claim that states, suggests or implies that consumption of a category of food, a food or one of its constituents significantly reduces a risk factor for the onset of a disease human.

Making Product Nutrition and Health Claims

- The ability to make a claim is subject to strict regulations.
- The purpose of these rules on nutrition and health claims is to ensure that, in the European Union and the United Kingdom, any claim concerning the labelling, presentation of a food or advertising, is clear, accurate and based on scientific evidence, thus protecting the consumer and, at the same time, promoting innovation and ensuring fair competition.
- The European Commission presents, on its website, a register of authorised nutrition and health claims and rejected, in order to ensure full transparency for consumers and operators in the food sector.
- Guidance for UK businesses is provided by the [UK Government here](#)



Slide 37

AH0

I will need to add reference to the UK

Alison Haselgrove, 2022-03-22T13:49:25.381

Scope of Nutrition Claims

- Only nutrition claims listed in the Annex to Regulation (EC) No. 1924/2006, in the annex to Regulation (EU) no. 116/2010 and in the annex to Regulation (EU) no. 1047/2012, which concern the following nutrients and food constituents:

Regulation (EC) no. 1924/2006 Regulation (EU) no. 1047/2012

- Energetic value
- Fat
- Saturated fat
- Sugars
- Sodium/Salt
- Fibre
- Proteins
- Vitamins and Minerals

Regulation (EU) no. 116/2010

- Omega 3 fatty acids
- Monounsaturated fats
- Polyunsaturated fats
- Unsaturated fats



Nutrition Labelling Systems

The labelling schemes adopted between and within countries vary widely.

In 2018, 15 countries in Europe, of which 11 were in the EU, were identified as having a government-endorsed policy on interpretive front-of-pack labelling, with 13 of these adopting endorsement logos

These labelling systems aim to be easy to read, and often use colour-coding combined with a graded indicator, to help consumers of various ages, socio-economic status, and cultural background in identifying more healthful products.

If your business plans to export, you may wish to align your on pack nutritional information into the presentation that consumers in that country are used to seeing.

Nutrition Information		
	Per 100 g	
	%Reference Intake RI	
Energy	485 kJ / 117 kcal	6% RI
Fat	8 g	11% RI
Of which Saturates	3,7 g	19% RI
Carbohydrate	9 g	3% RI
Of which Sugars	8 g	9% RI
Protein	1,4 g	3% RI
Salt	0,02 g	0% RI
Vitamin C	14,81 mg	19% RI

Salt content is exclusively due to the presence of naturally occurring sodium.
Reference intake of an average adult (8 400 kJ / 2 000 kcal)

INGREDIENTS: Mandarin Oranges (37.9%), Light Whipping Cream (Milk), Pears (12.4%), Peaches (7.7%), Thompson Seedless Grapes (7.6%), Apple (7.5%), Banana (5.9%), English Walnuts (Tree Nuts)



Modified Reference Intakes



Multiple Traffic Lights



Logo Nutri-Score / Santé Publique France 2017



SENS

Slide 39

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Again - maybe partners could help us out with photos from products in their country ?

Alison Haselgrove, 2022-03-22T13:45:30.516

Examples of Types of Nutrition Labelling Systems

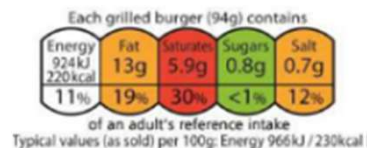
Interpretive/Informative systems:

providing information as guidance to help consumers understand the relative healthiness of food products. They provide factual information, with no specific judgement or guidance about the nutritional quality of a food product (sometimes)

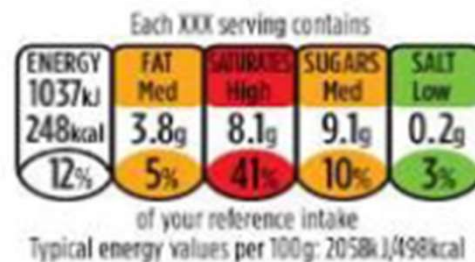


'Nutrient-specific' schemes, providing more or less detailed nutritional information on specific nutrients.

This category can be sub-divided into 'numerical' and 'colour-coded' sub-categories.



Summary or nutrient based: show an overall indicator of the healthiness of a product, based on a combination of several nutritional criteria, or provide information on a set of nutrients.



Tone of judgement (for interpretive schemes): according to the degree to which labels provide a direct judgement about product healthfulness.











'Summary indicator' schemes that rather provide a synthetic appreciation of the product's overall nutritional quality/healthfulness.

These schemes can be sub-divided into 'positive' indicators (endorsement logos) that can be applied only on foods complying with certain nutritional criteria, and 'graded' indicators that are providing global and graded information on the nutritional quality of foods and can be applied on all food products.



Nutritional Labelling Systems in European Countries

Taxonomies put forward in the literature				Examples of FOP schemes		Developer	EU Member State
Nutrient-specific labels	Numerical	Non-directive	Reductive (non-interpretative)	Reference Intakes label		Private	Across the EU
				NutrInform Battery		Public	IT
	Colour-coded	Semi-directive	Evaluative (interpretative)	UK FOP label		Public	UK
				Other 'traffic light' labels		Private (retailers)	PT, ES
Summary labels	Positive (endorsement) logos	Directive	Evaluative (interpretative)	Keyhole		Public	SE, DK, LT
				Heart/Health logos		NGO Public	FI SI HR
				Healthy Choice		Private	CZ, PL Phased out in NL
	Graded indicators			Nutri-Score		Public	FR, BE ES, DE, NL, LU

Slide 41

AH0

Again - maybe partners could help us out with photos from products in their country ?

Alison Haselgrove, 2022-03-22T13:45:30.516

Nutritional Labelling Systems - A few examples from the AHFES Countries



UK



SPAIN



FRANCE



PORTUGAL



Establishing Nutritional Labelling

Food labelling is covered by Regulation (EU) No. 1169/2011.

Technical guidance for UK businesses is available from gov.uk here

The labelling of a product is carried out when a product is developed.

These declared values must be average values, established, as the case may be, from:

- a) The analysis of the foodstuff carried out by the manufacturer or at the request of the manufacturer;
- b) The calculation made from known or actual average values for the ingredients used (food composition tables);
- c) The calculation made from generally established and accepted data.



Slide 43

AH0

I've just updated the title of this slide.

the nutritional panel is for the USA - I think we could replace with something from EU & UK ?

Alison Haselgrove, 2022-03-22T13:47:44.066

Testing Your Products for Labelling Purposes

Also see our training module

[P5-M7 Product Testing in the Development Process](#)

for helpful advice on the tests required to generate robust
information to include on your product labels

Legislation for Claims Goes Beyond Packaging

The regulation (CE) N° 1924/2006 and retained UK legislation is wide ranging and does not just apply to what you say on your packaging but all your marketing and advertising activities as well :

- It harmonises legislative, regulatory and administrative provisions on nutrition and health claims, ensuring a high level of consumer protection;

It applies to nutrition and health claims made in commercial communications, whether on the labelling, presentation or advertising of foods to be supplied as such to the final consumer;

It is also applicable with regard to food intended for the supply of restaurants, hospitals, schools, cafeterias and other collective catering establishments;

- These nutritional and health claims should be factual, increase the consumption of the product and suggest a healthy and balanced diet.

2006R1924 — EN — 13.12.2014 — 004.001 — 1

This document is meant purely as a documentation tool and the institutions do not assume any liability for its contents

►B ►C1 REGULATION (EC) No 1924/2006 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL,

of 20 December 2006

on nutrition and health claims made on foods ◄

(OJ L 404, 30.12.2006, p. 9)

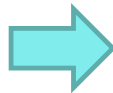
Updating Your Labelling

Re-labelling a product is necessary when

- There is a product reformulation – this may include a change of ingredients or weight of pack, alteration in the original recipe or changes in the supplier or provenance of raw materials or adherence to a supply chain scheme alters
- Special care should be paid to changes in allergen status and it is good practice to highlight this on the front of your packaging as consumers who are used to buying your product may not check the label in detail before consuming the reformulated product
- New legislation or other legal changes (such as when the UK left the EU) may require a change in labelling



Product Manufacturing



Labelling



Changing raw materials/
ingredients



Recipe Changes



Supplier
Changes



Re-Labelling



Slide 46

AH0

Slight amend to the slide title

Alison Haselgrove, 2022-03-22T13:48:17.161

Voluntary Statements, Marketing Terms and Logos

In labelling, in addition to the mandatory mentions, voluntary mentions can be made, which are only provided if the producer so wishes. However, they are also subject to some rules:



- They cannot mislead the consumer;
- They cannot be ambiguous or confusing for the consumer;
- If appropriate, they should be based on relevant scientific data;
- They cannot be presented to the detriment of the space available for mandatory

Labelling and Symbols

- Certification symbols in labelling are used as the written guarantee given by an independent and impartial certification body, proving that the product complies with the requirements defined by standards or technical specifications.
- Certification has the advantage of allowing the company to demonstrate impartially and credibly the quality, reliability and "performances" of its products, in order to reinforce customer confidence; make a difference against competitors; increase competitiveness by reducing non-quality costs; enhance the company's image; it is a way of accessing new markets and makes it possible to demonstrate compliance with technical regulations.
- Depending on the type of certification or symbol that you want to put on the label, there are different entities for this purpose.



Labelling and Vegan Products

- Product labelling for vegetarians and vegans is critical, especially as consumers choosing these lifestyles often ask for **transparency**, so they can quickly, conveniently and confidently identify vegan and vegetarian products.
- Doubt can arise for these consumers because many substances are added, some of animal origin, which are only specified as E numbers. Many consumers are not familiar with such E numbers, while other components may not be listed because they do not legally need to be declared – for example if they are processing aids.
- Some businesses choose to enlist **independent entities** to audit and certify that their food or drink products, are compliant with defined standards. This also entitles them to carry an official logo for that body.
- A more generic vegetarian or vegan label may be used by companies which are not certified and are not subject to audits by independent entities, but this type of labelling may have less credibility or even can sometimes go unnoticed by consumers.



Organic Labelling



- Label profiles have changed a lot in recent years due to consumer-driven demands.
- Cleaner and similarly more "natural" labels have become popular marketing tools to appeal to niche markets and health-conscious consumers.
- Some consumers have turned more towards organic foodstuffs, and the EU organic production logo is used to verify the origin of the raw materials from which the product is composed.
- Any organic logos must only be used if the product fully qualifies to be legally stated as organic.
- Regulation (EC) No 834/2007 defines the labelling rules applicable to each category of organic products.
- UK businesses can find guidance on approved accreditation bodies and labelling of organic foods post Brexit from [the UK Government here](#)



We hope that you have found this training module a useful and helpful support to your healthy food and drink innovation.

This training module is one of a number of training opportunities, organised into themed training programmes to support SME's (small & medium sized enterprises) in the participating regions of Wales, Northern Ireland, Ireland, Spain, Portugal and France to successfully bring new and reformulated healthy food and drink products to market.

The training was created by the partners within the AHFES project which is a quadruple helix Atlantic area healthy food eco-system for the growth of SME's funded by the European Union under the Interreg Atlantic Area Funding Programme.

This programme promotes transnational cooperation among 36 Atlantic regions of 5 European countries and co-finances cooperation projects in the fields of Innovation & Competitiveness, Resource Efficiency, Territorial Risks Management, Biodiversity and Natural & Cultural Assets.

For more information about other training available [please click here](#).



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