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GDSN Implementation Guidelines for EU Regulation 1169/2011

How to exchange mandatory information required by the EU Regulation 1169/2011 in GDSN.

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1 Introduction

EU Regulation 1169/2011 on the provision of food information to consumers is designed to make food labelling easier to understand, so that consumer health is protected and the consumer's right to information that allows them to make informed decisions is guaranteed. It changes existing legislation on food labelling in several ways and most of the rules must be applied since December 2014.

GS1 standards, services and solutions can help companies to comply with requirements concerning communication of product data and provisions concerning distance selling and to achieve data of good quality.

This document aims at providing a harmonized way of using GDSN to exchange all mandatory information to comply with the regulation between trading partners. The objective here is to specify the data to be exchange between datapools. Each Data pool is responsible for mapping the right message. The way the information will be displayed on the website by the user of the data is outside the scope of these recommendations.

This guidance is a technical document and is not intended to provide a legal interpretation of Regulation 1169/2011, the ultimate official interpretation of which is the exclusive reserve of the judicial powers, i.e. the national courts and the Court of Justice of the European Communities.

2 The mandatory particulars

The following product data must be shown on the labels of pre-packaged foods:

(a) the name of the food.

(b) the list of its ingredients.

(c) any ingredient or processing aid causing allergies or intolerances used in the manufacture or preparation of a food and still present in the finished product, even if in an altered form. (A list of allergies that must be declared is given in an annex to the regulation.)

(d) the quantity of certain ingredients or categories of ingredients.

(e) the net quantity of the food.

(f) the date of minimum durability or the "use by" date.

(g) any special storage conditions and/or conditions of use.

(h) the name and address of the food business operator under whose name the food is marketed (or the importers name if the food business operator is outside the EU)

(i) the country of origin or place of provenance where provided for in Article 26;

(j) Instructions for use where it would be difficult to make appropriate use of the food without such instructions;

(k) with respect to beverages containing more than 1,2 % by volume of alcohol, the actual alcoholic strength by volume;

(l) a nutrition declaration.

In addition allergens as described in (c) above must be communicated to consumers when they are present in food that is not pre-packaged but is sold either at retail or by foodservice outlets (eg. cafes and restaurants).

3 Distance selling

Article 14 of the regulation states that when pre-packed foods are offered for sale by means of distance communication all the same mandatory particulars, except use by date, shall be available before the purchase is concluded and shall appear on the material supporting the distance selling or be provided through other appropriate means clearly identified by the food business operator and

also be available at the moment of delivery and also be available at the moment of delivery. The business whose name is used to market the food should provide the necessary data to the on-line retailer in advance (although this is not a legal requirement) so that web-pages including the information can be designed. Communication of GS1 standard data usually ensures the relevant data is available so that the requirements can be met.

4 Attributes description

Description of all the mandatory GDSN attributes used to exchange information required by the EU Regulation 1169/2011 on the provision of food information to consumers. The list also contains some optional attributes used today to describe packaging. Other specific information may be used at local level.

All relevant attributes should be declared in all applicable languages in the target market. If some particulars do not apply to some products, corresponding attributes should not be populated.

4.1 Name of the food

4.1.1 Legal name

- **GDSN name:** regulatedProductName
- **GDSN Module:** TradeItemDescriptionModule
- **GDSN definition:** The prescribed, regulated (legal) or generic product name or denomination that describes the true nature of the food and is sufficiently precise to distinguish it from other foods according to the country specific regulation.
- **Instruction:** Should be the same as the regulated name on the pack. In the annexes III and VI of the regulation, some qualifications such as "with sweeteners" are detailed and are part of the legal name and should be included as well.
- **Remark:** this is not the label description or commercial name of the product, but a more generic/legal name of the product. The legal name is defined in the regulation in article 2.2(n).
- **Example:** "soup" or "biscuits" or "instant soup" or "Soda with sweeteners"

4.2 List of ingredients

4.2.1 Ingredient statement

- **GDSN name:** ingredientStatement
- **GDSN Module:** FoodAndBeverageIngredientModule
- **GDSN definition:** Information on the constituent ingredient make-up of the product, specified as one string.
- **Instruction:** Exact copy of ingredient statement on packaging including any additional information indicated for a specific ingredient, like percentage etc. If ingredients (e.g. allergens) are highlighted (bold/italic/underlined/colours/etc.) on the package, **it is recommended to use CAPITAL letters to highlight them in the Ingredient statement.**

  In some markets, GDSN formatting pattern is also used to highlight allergens in the Ingredient statement.
- **Remark:** The percentages can be included in this statement. This also applies for categories. This field always starts with the word "Ingredients:" in the relevant language. Foot notes are part of the ingredient statement.
- **Example:** "Ingredients: tomatoes (80%), water, MILK, salt."

4.3   Allergens

To highlight allergens as specified in the Regulation, GS1 in Europe recommends using capital letters in the ingredient statement (ingredientStatement attribute).

If you need to enable automated processing of allergen information, GS1 in Europe recommends the use of the allergens code list for the 14 allergens mentioned in the Regulation.

The GDSN attributes used in this case are:

■   **allergenTypeCode**: The following table describes the codes to indicate the 14 allergen categories described by EU regulation 1169/2011. Other allergen codes can also be indicated to provide more detail about the allergens contained in the product.

Allergen	GDSN code
Crustacean	AC
Eggs	AE
Fish	AF
Milk	AM
Tree Nuts	AN
Peanuts	AP
Sesame Seeds	AS
Sulphites	AU
Gluten	AW
Soy	AY
Mustard	BM
Molluscs	UM
Celery	BC
Lupin	NL

■   **levelOfContainmentCode**: indicates the presence or absence of the chosen allergen. Possible values are:

- CONTAINS: in light of EU Reg. 1169/2011 this value would mean that there's an indication on the physical label that this allergen is present in the product.

- MAY_CONTAIN: in light of EU Reg. 1169/2011 this value would mean that there's an indication on the physical label that this allergen <u>might</u> present in the product.

- FREE_FROM: in light of EU Reg. 1169/2011 this value would mean that there's an indication on the physical label that this allergen is **<u>not</u>** present in the product.

- UNDECLARED: Currently not used in Europe.

■   **allergenRelevantDataProvided:** By indicating the value 'true', the data provider acknowledges that all allergen relevant information provided on the physical product label has been populated. In other words, if a certain allergen code was not mentioned by the data provider this can be interpreted as if no information was provided on the label about this allergen. From an end-consumer perspective this would be interpreted as if the allergen is not part of the product (=below the legal tolerance to be mentioned on the label).

Example in case of a product only containing eggs, but no other allergen information mentioned on the label:

- allergenTypeCode = 'AE',
- levelOfContainmentCode = 'CONTAINS',
- **allergenRelevantDataProvided = 'true'**.

If trade item contains allergens but has no ingredient statement, it is recommended to use allergenTypeCode and corresponding levelOfContainmentCode to indicate presence of such allergens.

4.4 Quantity declaration

4.4.1 Net content + UoM

- **GDSN name:** netContent
- **GDSN Module:** TradeItemMeasurementsModule
- **GDSN definition:** The amount of the trade item contained by a package, usually as claimed on the label.
- **Instruction:** For fixed value trade items use the value claimed on the package. In case of variable quantity trade items, indicates the average quantity.
- **Remark:** Must be associated with a valid UoM.
- **Example:** Water 750ml: netContent = 750 + 'MLT'; Box of 6 eggs: netContent = 6 + 'H87'.

4.4.2 Net content statement (AVP)

- **GDSN name:** netContentStatement
- **GDSN Module:** This AVP will be present in the Core.
- **GDSN definition:** This statement corresponds to the net content descriptions as stated on the packaging (e.g. "4 x 100gr = 400 gr").
- **Instruction:** Use when net content as stated on the label cannot be expressed only by netContent attribute and free text description is therefore needed. For example for prepacked item that consists of two or more individual prepacked items containing the same quantity of the same product. This attribute shall start with a language ISO code.
- **Remark:** Free text field.
- **Example:** "en:4 x 100gr = 400 gr"; "en:2 x 50gr"

4.4.3 Drained weight + UoM

- **GDSN name:** drainedWeight
- **GDSN Module:** TradeItemMeasurementsModule
- **GDSN definition:** The weight of the trade item when drained of its liquid.
- **Instruction:** Where a solid food is presented in a liquid medium, the drained net weight of the food shall also be indicated.
- **Remark:** Must be associated with a valid UoM (Unit of Measure).
- **Example:** 225 + 'GRM' = pickles drained of its vinegar (if net weight is e.g. 350 gr).

4.5 Name and address of the food business operator

4.5.1 Type of contact

- **GDSN name:** contactTypeCode
- **GDSN Module:** tradeItem/tradeItemContactInformation
- **GDSN definition:** The party having legal responsibility for the product in the target market. This party is responsible for licensing and regulations within the target market and can be the manufacturer, importer, sales agent or broker.
- **Instruction:** Populate with the code value 'BZL' (=Licensee Registrar (GS1 Code)).
- **Remark:** This field is mandatory.
- **Example:** 'BZL'.

4.5.2 Food business operator

- **GDSN name:** contactName
- **GDSN Module:** tradeItem/tradeItemContactInformation
- **GDSN definition:** The name of the individual or department that can be contacted to provide additional information.
- **Instruction:** Populate as stated on the package.
- **Remark:** The name of the food business operator can be the same as the brand owner and/or manufacturer, but can also be the name of the party that has the right to distribute/import it.
- **Example:** "Factory X Company".

4.5.3 Company address

- **GDSN name:** contactAddress
- **GDSN Module:** tradeItem/tradeItemContactInformation
- **GDSN definition:** Used to communicate the physical location of a contact party.
- **Remark:** Fill the company communication physical address associated with the contact name as stated on the label.
- **Example:** "Koningsstraat 76, 1000 Brussel"; "Rue Royale 76, 1000 Bruxelles"; "21 Boulevard Hausmann, 75009 Paris".

4.6 Origin declaration

The following attributes allow to specifically mention the origin of the products. The attributes related to the life of animals (cattle, sheep…) shall only be completed when relevant.

4.6.1 Origin statement

- **GDSN name:** provenanceStatement
- **GDSN Module:** PlaceOfItemActivityModule
- **GDSN definition:** Free text description of the geographic area the product originates from.
- **Instruction:** State the place of origin, if mentioned on the label.
- **Remark:** If mentioned on the label.
- **Example:** "British beef"; "Fabriqué en Normandie"; "Produit en France".

4.7 Instructions declaration

4.7.1 Instruction for use

- **GDSN names:** preparationInstructions
- **GDSN Module:** FoodAndBeveragePreparationServingModule
- **GDSN definition:** Textual instruction on how to prepare the product before serving.
- **Instruction:** If mentioned on the label.
- **Remark:** Complete this information in all relevant languages for the target market as mentioned in the physical package.
- **Example:** "Heat the oven to 200°C, unpack the pizza from the box, remove the plastic foil, bake the pizza for 12minutes, remove carefully from the oven, slice the pizza before serving."

4.8 Storage conditions

4.8.1 Storage conditions

- **GDSN names:** consumerStorageInstructions
- **GDSN Module:** ConsumerInstructionsModule
- **GDSN definition:** Expresses in text the consumer storage instructions of a product which are normally held on the label or accompanying the product. This information may or may not be labelled on the pack. Instructions may refer to a suggested storage temperature, a specific storage requirement or a reference to environment or duration.
- **Instruction:** If mentioned on the label.
- **Remark:** Complete this information in all relevant languages for the target market as mentioned in the physical package.
- **Example:** "Refrigerate After Opening"; "Consume within 4 days"; "Keep Out Of Direct Sunlight"; "Store at an Ambient Temperature".

4.8.2 Conditions of use

- **GDSN names:** consumerUsageInstructions
- **GDSN Module:** ConsumerInstructionsModule
- **GDSN definition:** Expresses in text the consumer usage instructions of a product which are normally held on the label or accompanying the product. This information may or may not be labelled on the pack. Instructions may refer to how the consumer should use the product. This does not include storage, food preparations, and drug dosage and preparation instructions.
- **Instruction:** If mentioned on the label.
- **Remark:** Complete this information in all relevant languages for the target market as mentioned in the physical package.
- **Example:** "Shake before using"

4.9 Alcoholic strength

4.9.1 Alcoholic strength by volume

- **GDSN name:** percentageOfAlcoholByVolume
- **GDSN Module:** AlcoholInformationModule
- **GDSN definition:** Percentage of alcohol contained in the base unit trade item.

- **Instruction:** with respect to beverages containing more than 1,2 % by volume of alcohol, the actual alcoholic strength by volume is mandatory for the EU regulation 1169/2011.
- **Remark:** /
- **Example:** "12"

4.10 Nutrition

Following attributes are used to provide information from the header of nutrition facts label:

- Nutrient basis quantity,
- Serving size description (if needed),
- Preparation state,
- Daily value intake reference (if needed).

Following 3 dependent attributes need to be completed for each nutrient:

- Nutrient type code,
- Quantity contained,
- Measurement precision.

For minerals and vitamins, 2 more attributes should be used:

- Percentage of daily value intake,
- Percentage of daily value intake measurement precision.

4.10.1 Nutrient declaration header

4.10.1.1 Preparation state

- **GDSN name:** preparationStateCode
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** Code specifying whether the nutrient information applies to the prepared or unprepared state of the product.
- **Instruction:** When completing nutrient related information, the distinction can be made between the unprepared, and the prepared state of a product. The prepared state is for example the state of the product after adding water, milk, etc., by the consumer. When the preparation state is not mentioned in the label, indicate "unprepared" in order to insert nutrient information for the product.
- **Remark:** /
- **Examples/Recommended values:** 'PREPARED' or 'UNPREPARED'

4.10.1.2 Reference intake

- **GDSN name:** dailyValueIntakeReference
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** Free text field specifying the base on which the daily value intake per nutrient has been declared.
- **Instruction:** /
- **Remark:** /
- **Example:** "Reference intake of an average adult (8400 kJ/2000 kcal)"

4.10.1.3 Nutrient basis quantity + UoM

- **GDSN name:** NutrientBasisQuantity
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** The basis amount that a nutrient is measured against. In some markets this is required by regulation. For example, 100 gr, 100 ml, etc. Please refer to the target markets implementation guideline on how to populate this.
- **Instruction: Always use at least per 100 g or 100 ml** since this is the legally required way of stating the information as mentioned in the EU Regulation 1169/2011.
- **Remark:** You can repeat the information and provide other values (serving sizes) if displayed on the package.
- **Example:** 100 + 'GRM'; 100 + 'MLT'; 30 + 'GRM' ...

This is a new attribute added into GDSN during Major Release 3. There is an ongoing process of harmonization initiated by GS1 in Europe to gradually stop using servingSize attribute which is currently used by several European target markets instead of or in combination with nutrientBasisQuantity. The objective is to have one harmonized approach to exchange information from header of nutrition facts table in all European target markets. In case more information is needed, please contact your local GS1 organisation.

At some target markets, suppliers are required to also populate nutrientBasisQuantityTypeCode to qualify whether value provided in nutrientBasisQuantity is serving size or not.

Work request has been submitted to GSMP to add new AVP nutrientBasisQuantityDescription. This AVP will allow free text description of nutrient basis quantity when needed. If approved, this AVP will replace servingSizeDescription in this Guideline.

4.10.1.4 Serving size description

- **GDSN name:** servingSizeDescription
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** Indicates the size of a typical serving of the food product as it should be displayed on the package.
- **Instructions:** Use when the quantity of food (serving size) expressed in value + unit of measure is not relevant for consumers. See example.
- **Remark:** You can repeat the information by portion if relevant.
- **Example:** "For one biscuit (75 g)"; "For one glass (20 cl)".

Warning: work request has been submitted to GSMP to add new AVP nutrientBasisQuantityDescription. This AVP will allow free text description of nutrient basis quantity when needed. If approved, this AVP will replace servingSizeDescription in this Guideline.

4.10.2 Nutrient detail

4.10.2.1 Nutrient type code

- **GDSN name:** nutrientTypeCode
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** Code from the list of the INFOODS food component tagnames (detailed in the regulation requirement analysis Excel sheet) identifying nutrients contained in the product.
- **Instruction:** Nutrient type code can be found in the NutrientCodeList in the Excel sheet
- **Remark:** INFOODS codes do not only describe nutrients but also energy, vitamins and minerals.
- **Example:** 'ENER-' (remark: this is the energy **code for both kcal and joule**)

4.10.2.2 Measurement precision

- **GDSN name:** measurementPrecisionCode
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** Code indicating whether the specified nutrient content is exact or approximate.
- **Instruction:** Always use approximately, except when a "<" appears on the pack. In this case you should use 'LESS_THAN'. For traces declaration, use 'LESS_THAN' with "0" as the quantityContained.
- **Remark:** /
- **Example / Recommended values:** 'LESS_THAN'; 'APPROXIMATELY'.

4.10.2.3 Quantity contained + UoM

- **GDSN name:** quantityContained
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** Measurement value indicating the amount of nutrient contained in the product. Is expressed relative to the serving size.
- **Instruction:** This has to be accompanied by a valid UoM (e.g. 'GRM' for grams). As a minimum, quantity contained must be declared by 100g or 100ml. Additional declaration, per portion for instance, may be added.
- **Remark:** The nutrient UoM must strictly conform to the values specified on the label. There is a need to transmit a value like "2.0", today the "0" at the end cannot be transmitted in most of the technical solution.
- **Example:** 2 + 'GRM'.

4.10.2.4 Percentage of daily value intake

- **GDSN name:** dailyValueIntakePercent
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** The percentage of the recommended daily intake of a nutrient as recommended by authorities of the target market. Is expressed relative to the serving size and base daily value reference intake.
- **Instruction:** /
- **Remark:** For minerals and vitamins (per 100ml or 100gr) this attribute becomes mandatory.
- **Example:** 15.

4.10.2.5 Percentage of daily value intake measurement precision (AVP)

WARNING : This AVP is not in the core of trade item but in the class NutrientDetail.

- **GDSN name:** dailyValueIntakePercentMeasurementPrecisionCode
- **GDSN Module:** NutritionalInformationModule
- **GDSN definition:** Code indicating whether the specified nutrient content for the Daily Value Intake % is exact or approximate or less than.
- **Instruction:** This attribute is an AVP in GDSN v3.1.
- **Remark:** This attribute should be populated only if the following signs "<", "<=", ">", ">=" appear on the pack for the percentage of daily value intake.
- **Example:** 'LESS_THAN'; 'LESS_THAN_OR_EQUAL'; 'GREATER_THAN'; 'GREATER_THAN_OR_EQUAL'.

4.11 Additional particulars

4.11.1 Additional particulars

- **GDSN name:** compulsoryAdditiveLabelInformation
- **GDSN Module:** HealthRelatedInformationModule
- **GDSN definition:** A description of any compulsory label information on the product for the serving counter.
- **Instruction:** Info from Annex III and VI of the regulation. Except for 2.1 "with sweetener(s)" and 2.2 "with sugar(s) and sweetener(s)" these statements shall accompany the regulated name of the food.
- **Remark:** These additional particulars are described in annex III and VI of the regulation 1169/2011.
  (http://eurlex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:304:0018:0063:EN:PDF).
- **Example:** "Packed in a protective atmosphere"; "excessive consumption may produce laxative effects" or "contains liquorice".

The name of the attribute compulsoryAdditiveLabelInformation may be confusing, this is the reason why a request has been made to change the name to compulsoryAdditionalLabelInformation. The definition and the recommendations listed above will remain the same.

5 Particular cases / General recommendations

5.1 Mixed products management

Here are the specific recommendations concerning mixed product ingredient and nutritional declaration:

Detail ingredients list for each product in the ingredientStatement attributes, starting with the name of the product described (text field limited to 5000 characters). For the nutritional declaration, use an average or repeat nutrients for each component, using servingSizeDescription to specify the component name. Choosing one or other option should depend on what is displayed on the pack.

5.2 Separator in text fields

Lots of fields described in this document are unformatted free text. To better stick with the packaging layout, some formatting information may be transmitted. To achieve this we recommend to use '#' to separate two independent parts of the field.