

GDSN Implementation Guidelines for EU Regulation 1169/2011 Mandatory Information

V1.0 - March 2014

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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 by 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 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).

Distant 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, must be available in the material supporting the distance selling (usually on a website) 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.

Attributes description

Description of all the mandatory attributes of the European list. Current document "EU Regulation requirements - analysis with GDSN v15 March 2014". The list also contained 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.

Name of the food

- **Legal name (AVP)**

- GDSN name** : regulatedProductName
- 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 case of multiple languages in the same target market, repeat the attribute starting with the corresponding language ISO 639-1 alpha 2 code (2 letters, lower case).
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 on article 2.1 (n).
- Example** : 'soup' or 'biscuits' or 'instant soup' or 'Soda with sweeteners'
es:leche (use of the ":" separator to be confirmed)
ca:llet

List of ingredients

- **Ingredient statement**

- GDSN name** : ingredientStatement
- GDSN definition** : Information on the constituent ingredient make up of the product, specified as one string.
- Instruction** : Exact copy of ingredient statement on packaging.
- Remark** : The percentages can be included in this statement. This also applies for categories. Bold, italic or underlined text cannot be uploaded in the datapool.

This field always start with the word "Ingredients:" in the relevant language.

If information on the fish catch zone or method of catching is stated on the label, enter this information after the ingredients list in the same way as it is stated on the label.

Foot notes are part of the ingredient statement.

- Example** : 'Ingredients: tomatoes (20%), water, salt. '

- **Allergen statement**

- GDSN name** : allergenStatement
- GDSN definition** : Textual description of the present or absence of allergens as governed by local rules and regulation, specified as one string.
- Instruction** : Declare here the ingredient or processing aid listed in annex II of the EU 1169/2011 regulation or derived from a substance or product listed in annex II causing allergies or intolerances used during the manufacturing or preparation of a food and still present in the finished product, even if in an altered form as declared in the ingredient list.
The separator `,' should be used between the declaration of every allergen.
- Remark** : The idea is to have an exact copy of the ingredients containing allergens, or the actual allergens mentioned in the ingredient statement. This will allow retailers to map the allergen information to the ingredient statement, and making it possible to highlight the allergen information in the ingredient statement on the website (preferably in Bold).
- Example**: Milk, celery.

Quantity declaration

- **Net content + UoM**

- GDSN name** : netContent
- 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**: Has to be associated with a valid UoM.
- Example**: Water 750ml - net content = "750 ML".
Box of 6 eggs – net content = "6 pieces".

- **DescriptiveSize**

- GDSN name** : DescriptiveSize
- GDSN definition** : An alphanumeric size factor the brand owner wishes to communicate to the consumer. Please use the specific definition of this data type and field, 1-35, as defined in the Trade Item BRD.
- Instruction**: To be used for prepacked item that consist of two or more individual prepacked items containing the same quantity of the same product.
- Remark**: free text field
- Example**: 4x50g

- **Drained weight + UoM**

- GDSN name** : drainedWeight
- 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.

- iv. **Remark** : Has to be associated with a valid UoM (Unit of Measure).
- v. **Example** : 225 "GR"= pickles drained of its vinegar (if net weight is e.g. 350 GR).

Name and address of the food business operator

- **Food business operator (AVP)**

- i. **GDSN name** : contactName
- ii. **GDSN definition** : The name of the individual or department that can be contacted to provide additional information.
- iii. **Instruction** : Populate as stated on the package.
- iv. **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.
- v. **Example** : 'Factory X Company'

- **Company address (AVP)**

- i. **GDSN name** : communicationAddress
- ii. **GDSN definition** : used to communicate the physical location of a contact party.
- iii. **Instruction** : In case of multiple languages in the same target market, repeat the attribute starting with the corresponding language ISO 639-1 alpha 2 code (2 letters, lower case).
- iv. **Remark** : Fill the company communication physical address associated with the contact name as stated on the label.
- v. **Example** : 'nl : Koningsstraat 76, 1000 Brussel' ; 'fr : Rue Royale 76, 1000 Bruxelles' ; '2 rue Maurice Hartmann, 92130 Issy-les-Moulineaux' .

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.

- **Origin statement (AVP to be requested)**

- i. **GDSN name** : countryOfOriginStatement
- ii. **GDSN definition** : Free text description of the geographic area the product originates from.
- iii. **Instruction** : State the place of origin. if mentioned on the label. In case of multiple languages in the same target market, repeat the attribute starting with the corresponding language ISO 639-1 alpha 2 code (2 letters, lower case).
- iv. **Remark** : If mentioned on the label.
- v. **Example** : en:Made in Germany. Made in Thüringen Mountains, Made in Paris, From the Napa Valley.

- **Place of birth (AVP)**

- GDSN name** : placeOfBirth
- GDSN definition** : The place the mammal, species was born. The place may be a country, region (land or sea), city, etc. Since a company may have multiple facilities in multiple countries, the attribute needs to be repeating to reflect the potential places. The actual birth place of a particular animal would be transactional.
- Instruction** : If mentioned on the label.
In case of multiple languages in the same target market, repeat the attribute starting with the corresponding language ISO 639-1 alpha 2 code (2 letters, lower case).
- Remark** : free text field.
- Example** : 'England', 'nl: Engeland'

- **Place of rearing (AVP)**

- GDSN name** : placeOfRearing
- GDSN definition** : Is the place the mammal, species was raised after birth to the end of the animals' life. The place maybe a country, region (land or sea), city, etc. Since a company may have multiple facilities in multiple countries, the attribute needs to be repeating to reflect the potential places. The actual rearing place(s) of a particular animal would be transactional.
- Instruction** : If mentioned on the label.
In case of multiple languages in the same target market, repeat the attribute starting with the corresponding language ISO 639-1 alpha 2 code (2 letters, lower case).
- Remark** : free text field.
- Example** : 'en : South-Africa'

- **Place of slaughter (AVP)**

- GDSN name** : placeOfSlaughter
- GDSN definition** : Is the place the mammal, species was killed to be processed for food, or other purposes. The place maybe a country, region (land or sea), city, etc. Since a company may have multiple facilities in multiple countries, the attribute needs to be repeating to reflect the potential places. The actual slaughter place of a particular animal would be transactional.
- Instruction** : If mentioned on the label.
In case of multiple languages in the same target market, repeat the attribute starting with the corresponding language ISO 639-1 alpha 2 code (2 letters, lower case).
- Remark** : free text field.
- Example** : 'en:Belgium', 'France'

Instructions declaration

- **Instructions for use (AVP, being validated by GDSN SMG)**

- i. **GDSN names:** UnspecifiedPreparationTypePreparationInstructions
- ii. **GDSN definition:** Textual instruction on how to prepare the product before serving.
- iii. **Instruction:** If mentioned on the label.
In case of multiple languages in the same target market, repeat the attribute starting with the corresponding language ISO 639-1 alpha 2 code (2 letters, lower case).
- iv. **Remark:** Complete this information in all relevant languages for the target market as mentioned in the physical package.
- v. **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.

This AVP is replacing the preparationType and preparationInstructions attributes.

Special storage conditions

- **Special storage conditions and/or conditions of use**
 - i. **GDSN names:** consumerUsageStorageInstructions
 - ii. **GDSN definition:** Expresses in text the consumer storage and 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 a suggested storage temperature, a specific storage requirement or a reference to environment or duration. Examples include: "
 - iii. **Instruction:** /
 - iv. **Remark:** Complete this information in all relevant languages for the target market as mentioned in the physical package.
 - v. **Example:** "Refrigerate After Opening", "Consume within 4 days", "Keep Out Of Direct Sunlight", "Store at an Ambient Temperature"

Alcoholic strength

- **Alcoholic strength by volume**
 - i. **GDSN name :** percentageOfAlcoholByVolume
 - ii. **GDSN definition :** Percentage of alcohol contained in the base unit trade item.
 - iii. **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.
 - iv. **Remark :** /
 - v. **Example :** "12"

Nutrition

The 5 dependent attributes that need **to be completed for each nutrient** are:

- Preparation state

- Nutrient type code
- Measurement precision
- Quantity contained + UoM
- Serving size

For minerals and vitamins, 3 more attributes should be used :

- Percentage of daily value intake
- Daily value intake reference
- Percentage of daily value intake measurement precision

- **Preparation State**

- i. **GDSN name** : Preparation State
- ii. **GDSN definition** : Code specifying whether the nutrient information applies to the prepared or unprepared state of the product.
- iii. **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.

- iv. **Remark** : /
- v. **Available values** : 'prepared' or 'unprepared'

- **Nutrient type code**

- i. **GDSN name** : nutrientTypeCode
- ii. **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.
- iii. **Instruction** : Nutrient type code can be found in the NutrientCodeList in the Excel sheet
- iv. **Remark** : INFOODS codes not only describe nutrients but also energy, vitamins and minerals.
- v. **Example** : ENER- (remark: this is the energy **code for both kcal and joule**)

- **Measurement precision**

- i. **GDSN name** : measurementPrecision
- ii. **GDSN definition** : Code indicating whether the specified nutrient content is exact or approximate.
- iii. **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.
- iv. **Remark** : /
- v. **Example** : LESS_THAN, APPROXIMATELY

- **Quantity contained + UoM**

- GDSN name** : quantityContained + UoM (Unit of Measure)
- 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. GR 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 GR.

- **Serving size**

- GDSN name** : ServingSize + ServingSize UoM
- GDSN definition** : Indicates the size of a typical serving of the food product as it should be displayed on the package.
- Instruction** : **! Use per 100g or 100ml** since this is the legally required way of stating the information as mentioned in the EU 1169/2011 regulation.
- Remark** : You can repeat the information by portion if relevant.
- Example** : 100 GR or 100 ML

- **Percentage of daily value intake**

- GDSN name** : percentageOfDailyValueIntake
- 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** : Mandatory only for minerals and vitamins per 100ml or 100gr.
- Example** : 15

- **Percentage of daily value intake measurement precision**

- GDSN name** : DailyValueIntakePercentMeasurementPrecisionCode
- 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 v2.8. The structure of this AVP is : "nutrientTypeCode:MeasurementPrecision:quantity of food". The value of nutrientTypeCode is used in the AVP to indicate the nutrient the measurement precision is given for. If you need to associate the measurement precision with a serving size, indicate the quantity of food (see exemple).

- iv. **Remark** : This attribute should be populated only if the following signs "<", "<=", ">", ">=" appear on the pack for the percentage of daily value intake.
- v. **Example** : If the percentage of daily value intake for vitamin D is "< 1 µg" for 100g then the value of DailyValueIntakePercentMeasurementPrecisionCode is : "VITD-:LESS_THAN: per 100 g"

- **Reference intake**

- i. **GDSN name** : dailyValueIntakeReference
- ii. **GDSN definition** : Free text field specifying the daily value intake base for on which the daily value intake per nutrient has been based.
- iii. **Instruction** :/
- iv. **Remark** : Mandatory only for minerals and vitamins per 100ml or 100gr.
- v. **Example** : "Based on a 2000 calorie diet."

Additional particulars

- **Additional particulars**

- i. **GDSN name** : compulsoryAdditivesLabelInformation
- ii. **GDSN definition** : A description of any compulsory label information on the product for the serving counter.
- iii. **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.
- iv. **Remark** : These additional particulars are described in annex III and VI of the regulation 1169/2011. (<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:304:0018:0063:EN:PDF>).
- v. **Example** : 'Packed in a protective atmosphere', 'excessive consumption may produce laxative effects' or 'contains liquorice'.

The name of the attribute 'compulsoryAdditivesLabelInformation' 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.

Particular cases / General recommendations

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 householdservingsize to specify the component name. Choosing one or other option should depend on what is displayed on the pack

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.

The target solution is to use formatting pattern to separate and format texts. If this feature is cannot be implemented, we recommend to use '#' to separate two independent parts of the field.

GS1 in Europe has developed this guideline on the basis of the consultation with GS1 in Europe members and a joint working group including members of FoodDrink Europe, AIM, Eurocommerce, the European Retail Round Table, Independent Retail Europe and EMOTA.



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