

# Legal Requirements for Labels on Fruit & Vegetables

Guideline on legal requirements for consumer units  
and trade units in the European Union



in collaboration with



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## Partners involved in the development of this document

### Frug I Com (Foundation Platform Fresh Chain Information)

Frug I Com is a unique collaboration of the Dutch Potato, Fruit and Vegetable Supply Chain. The ultimate goal is to establish electronic exchange of information between the participants in the Potato, Fruit and Vegetable Supply Chain by means of uniform labelling using electronic messages. Working with information standards allows Fruit and Vegetable Supply Chain companies to make optimum use of the information available in the supply chain and to apply it to order processing, tracing of products, optimising logistics and quality improvement. The result? A faster and more efficient supply chain which is less error-prone.

### GS1 in Europe

GS1 in Europe is a collaboration of 47 GS1 member organisations and leads the creation and implementation of harmonised, user-driven solutions for improving the supply and demand chain of European companies.

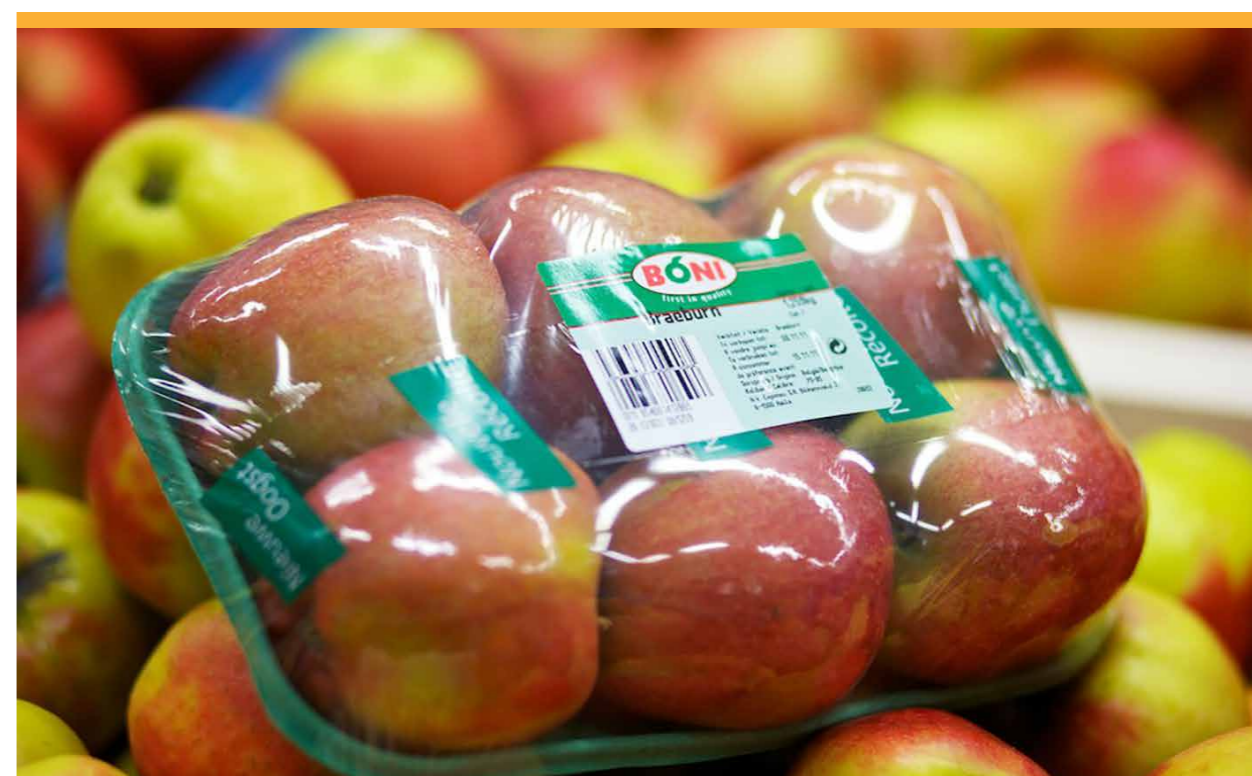
# Introduction

Within the Fresh Food sector, companies are focused on improving their business processes in the areas of location identification, product identification and data transport by means of electronic data interchange (EDI) and E-commerce applications, as well as the utilisation of technologies like barcodes and Radio Frequency Identification (RFID) to realise efficiency benefits.





One key area is the right labelling of consumer units and trade units, as this can lead – together with the usage by GS1 Standards for automatic identification (e.g. barcodes) – to significant improvements in the supply chain and faster processes in retail stores.




Apart from the requirements between the business partners, it is necessary to provide on labels for consumer units and trade units the right information according to a number of relevant EU directives like EU 1169/2011 or EU 543/2011 and their national implementations.

Based on a business view, this brochure aims to help companies in the fruit & vegetable sector and their business partners to have the same understanding regarding the legal requirements and provides guidance about the needed information on a label from a legal point of view.



Unprocessed Fruit & Vegetables – Label Requirements for Consumer Items						
	Prepacked single commodity		Prepacked variety pack (mixes of different species of fresh fruit & vegetables)	Non prepacked, loose	Additional remarks	Relevant Regulation (Source)
	Open pack <b>A</b> 	Closed pack <b>B</b> 	<b>C</b> 	<b>D</b> 		
Description	A prepacked open pack is a package for which the content can be altered without damaging the package.	A prepacked closed pack is a package for which the content cannot be altered without damaging the package.	A prepacked variety pack consists of components of different species of fruit and vegetables. Mix packages of different species are only allowed if their weight is ≤ 5kg & they are properly labeled.	Protective films covering single produce are not considered as a pre-package according to EU 2011/543.	These definitions for processed and unprocessed fruit and vegetables are only applicable for the labelling process. There are other definitions of prepared for other purposes in other regulations. The distinction between prepared and processed produce is defined in EU 852/2004, EU 1169/2011 defines information requirements for processed products.	EU 852/2004; EU 543/2011 Annex VI contains the categories of processed products; EU 1169/2011.
General	There is no labelling requirement for consumer items in open packages in the trading phase. Labelling is done on the trading package (column E or F).	Regulations also apply for mixes with the same species (e.g. tricolor-bell-peppers, lettuce mixes, apple varieties etc.)	For mix packages containing processed foodstuff the regulations for processed and prepared food apply (see column J).	There is no labelling requirement for loose items in the trading phase nor in consumer phase. Labelling is done on the trading package (column E or F).	When mandatory information on a consumer item is not visible when packed in a case, then the same information must be displayed on the case as well.	EU 543/2011 art. 5 & 6; U 1169/2011 art. 9 part 1, a 12 & 13.
Nature of produce = Regulated product name	Not applicable for open packages. In case of data exchange the nature of the produce as mentioned on the trading package should be used as regulated product name.	The nature of produce is mandatory. Depending on the product, the nature of produce contains the variety or commercial type.	The nature of produce is mandatory. Depending on the product, the nature of produce contains the variety or commercial type. The nature of produce for each product in the pack has to be declared.	Not applicable for loose items. In case of data exchange the nature of the produce as mentioned on the trading package should be used as regulated product name.	When a product is in a certain state, then that must be part of the product name to avoid misleading the end consumer. E.g. Dried figs, Peeled and diced mango's.	EU 1169/2011 art. 17.
Language	Not applicable for open packages.	The EU requires that the text on the label must be written in one of the official languages of an EU member state and be comprehensible for the consumer.	The EU requires that the text on the label must be written in one of the official languages of an EU member state and be comprehensible for the consumer.	Not applicable for loose items.	In several countries such as Belgium, France, The Netherlands and Germany, there is a national requirement that the language on the label must be one of the official languages of that country.	EU 1169/2011 art. 15; EU 543/2011 (trading units).
Minimum Fontsize	Not Applicable for open packages.	1,2mm (if label <80cm² then 0,9mm).	1,2mm (if label <80cm² then 0,9mm).	Not applicable on loose items.		EU 1169/2011 art. 13 par. 2-3.
Country of Origin	Not applicable for open packages. In the store the country of origin must be displayed in close proximity to the shelf.	Mandatory, declared either by the full name or by a common name of the country of origin. If the package contains a mix of varieties of the same product, like a pepper mix originating from different countries, the origin of each item must be listed on the label.	Mandatory, declared either by the full name or by a common name of the country of origin. The declaration may be replaced with one of the following terms, as appropriate: a) mix of EU fruit and vegetables b) mix of non-EU fruit and vegetables c) mix of EU and non-EU fruit and vegetables or likewise denominations.	Not applicable for loose items. In the store the country of origin must be displayed in close proximity to the shelf.	Abbreviations or ISO codes such as UK for Great Britain or DE for Germany are NOT allowed.	EU 543/2011 art. 7. and Annex 1; EU 1169/2011 (art. 26); EU 1308/2013 art. 113/1.
Identification of packer or other relevant parties	Not applicable for open packages.	Mandatory. Full name and address of Packer or Trader. Alternatively can be identified by name and address of a seller (retailer) established within the Union, indicated in close connection with the denomination 'Packed for:' or an equivalent denomination.	Mandatory. Full name and address of Packer or Trader. Alternatively can be identified by name and address of a seller (retailer) established within the Union, indicated in close connection with the denomination 'Packed for:' or an equivalent denomination.	Not applicable for loose items.	In case the denomination "Packed for" is used, the labelling shall also include a code mark representing the packer and/or the dispatcher. The seller shall give all information deemed necessary by the inspection body as to the meaning of this code mark.	EU 543/2011 annex 1 part A; EU 1169/2011 art. 8
Quantity: Net content expressed as count or net weight	Not applicable for open package. However, to inform the consumer, the quantity, expressed as net weight in grams or kilograms, must be given in the store in close proximity to the product.	The quantity in the prepacked package is expressed as net weight (in grams or kilograms). Net weight is not compulsory for products which are usually sold by number provided that the number of items is clearly visible from outside or the number is mentioned on the label.	The quantity in the prepacked package is expressed as net weight (in grams or kilograms). Net weight is not compulsory for products which are usually sold by number provided that the number of items is clearly visible from outside or the number is mentioned on the label. The quantities of each product in a mix have to be declared on the label.	Not applicable for loose items.	Some products loose a considerable amount of their weight or volume. Prepackages can be marketed either fixed or variable weight; In the first case, the weight must reflect the shrinkage (water loss) throughout the supply-chain. EU 543/2011 prevails above EU 1169/2011.	EU 1169/2011 – art. 23 + appendix X; EU 543/2011 art. 6.
Best Before Date/Expiry Date	Not applicable for fresh fruit & vegetables.	Not mandatory for fresh fruit & vegetables. Note that for sprouting vegetables (buds, sprouts and seedlings) declaration of the best before date is mandatory.	Not mandatory for fresh fruit & vegetables. Note that for sprouting vegetables (buds, sprouts and seedlings) declaration of the best before date is mandatory.	Not applicable for fresh fruit & vegetables.	Although it is not mandatory for fresh unprocessed fruit and vegetables the use of best-before-date is encouraged.	EU 1169/2011 – par. 24 + appendix X.
Production Lot number	Not applicable for open packages.	A production party identification or lot number is mandatory on the consumer package.	A production party identification or lot number is mandatory on the consumer package.	Not applicable for loose items.	A clearly defined Best-Before-Date or Production Date can be used as alternative for the lot number. Otherwise a lot number has to start with the capital "L"	EU 91/2011.
List of Ingredients	Not applicable for open packages.	Not applicable for fresh fruit & vegetables.	Not applicable when only a Mix of F&V is packed. If F&V with additional foodstuff is packed then all ingredients have to be declared.	Not applicable for loose items.	A list of ingredients is not required for unprepared fresh fruit and vegetables nor for products that contain only 1 ingredient and have the name of that single ingredient in the product name. (Cherrytomato contains tomato)	EU 1169/2011 art. 18- par. 1 and 21. EU 1169/2011 Appendix VII art. 19 par. 1 a and e.
Allergenic declaration	In F&V only applicable for Celery (leaves, stems and roots). This is not compulsory when the name of the allergen is part of the regulated product name. As this always contains the nature of produce an allergenic declaration will never be mandatory in this case.	In F&V only applicable for Celery (leaves, stems and roots) This is not compulsory when the name of the allergen is part of the regulated product name. As this always contains the nature of produce an allergenic declaration will never be mandatory in this case.	When celery is one of the items in the mix it is mandatory to declare it as an allergen on the label. The label shall contain either – an allergenic declaration in the list of ingredients – or elsewhere on the label the literal "Contains" followed by the name of the allergen.	In F&V only applicable for Celery (leaves, stems and roots). This is not compulsory when the name of the allergen is part of the regulated product name. As this always contains the nature of produce an allergenic declaration will never be mandatory in this case.	An allergenic declaration in the list of ingredients must be highlighted (for example CAPITAL, bold or italic).  Voluntary declaration of other allergens such as radish is encouraged.	EU 1169/2011.
Declaration of nutritional value	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables.	Declaration of nutritional values is mandatory when the package contains different categories of foodstuff (e.g. lettuce with dressing). See processed.	Not applicable for fresh fruit & vegetables.	The distinction between prepared and processed produce is defined in EU 852/2004. EU 1169/2011 defines information requirements for processed products.	EU 852/2004 art. 2 par. 1: definition of processed and unprocessed products EU 1169/2011.
Additives including waxes	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables.	EU 1169/2011 Annex VII part C contains all categories of additives. Waxes used on fruits are considered additives too. Aroma's is a separate category for which the same applies. The EU has published a positive lists of additives and waxes and the quantities that may be used. Note that additives must be declared in the list of ingredients which is not applicable for unprepared fruit and vegetables. A maximum of 10mg/kg of sulfite can be administered to packages of fruit, e.g. blueberries, lychees and tablegrapes. Excession of this value must be declared as an allergen!	EU 1333-2008; EU 1169/2011 Annex VII part C.  EU 543/2011 annex
Post Harvest Treatment	Not applicable for open packages.	Anti-molding agents added in a post-harvest treatment on citrus fruits must be mentioned on the package.	Anti-molding agents added in a post-harvest treatment on citrus fruits must be mentioned on the package.	Not applicable for loose items.	The type of gas used for the protective atmosphere should explicitly be allowed in EU 1333/2008	1169/2011 Annex III; EU 1333/2008.
Protective Atmosphere	Not applicable for open packages.	If a package contains gas to prolong the shelf life the term 'Packed in protective atmosphere' should be mentioned on the label.	If a package contains gas to prolong the shelf life the term 'Packed in protective atmosphere' should be mentioned on the label.	Not applicable for loose items.	Products with specific marketing standards are: apples, citrus peaches and nectarines, pears, strawberries, sweet peppers, table fruit, kiwi fruit, lettuces, curled leaved and broad-leaved endives, grapes, tomatoes. Providing this information is recommended for all other products covered by UNECE Standards.	EU 543/2011 annex I and art. 3; EU 1243/2007 art. 113/1.
Product dependent information requirement	For products for which the specific marketing standards apply, additional information about Quality Class, Size, Variety or Commercial Type and Post-harvest treatment has to be declared either on the product or in close proximity (on the shelf) in accordance with the specific UNECE product standard.					

Unprocessed Fruit & Vegetables – Label requirements for Trade Packages						
	<b>Open trading package (case) containing consumer items</b> <b>E</b> 	<b>Closed trading package (case) containing consumer items</b> <b>F</b> 	<b>Trading package (case) containing bulk/loose commodity</b> <b>G</b> 	<b>Trading package (case) is sold in consumer phase as a consumer unit case, non prepacked</b> <b>H</b> 	<b>Additional remarks</b>	<b>Relevant Regulation (Source)</b>
Description	The label on prepacked consumer items is visible from the outside of the trading package.	The label on prepacked consumer items is visible from the outside of the trading package.	Trading packages containing loose items may be covered by e.g. paper, carton or foil.	All regulations for consumer items and for trading packages apply.	These definitions for processed and unprocessed fruit and vegetables are only applicable for the labelling process. There are other definitions of prepared for other purposes in other regulations. The distinction between prepared and processed produce is defined in EU 852/2004, EU 1169/2011 defines information requirements for processed products.	EU 852/2004; EU 543/2011 Annex VI contains the categories of processed products; EU 1169/2011.
General	Labelling of a trading package is not required when it contains labelled consumer units which are visible from the outside.	All mandatory information applying to consumer items must also be declared or labelled on the trading package (Crate, Carton, Box).	Information on the trading package is obliged.	In the trading phase labelling on the package is required. The marketing of packages with mixes of different species of fruit and vegetables is allowed provided they contain a net weight of 5kg or less.	When mandatory information on a consumer item is not visible when packed in a case, then the same information must be displayed on the case as well.	EU 543/2011 art. 5 & 6; U 1169/2011 art. 9 part 1, a 12 & 13.
Nature of produce = Regulated product name	Not applicable for open trade packages with clearly visible consumer package labels.	A common and general name must be used. The name describes the nature of the produce.	A common and general name must be used. The name describes the nature of the produce.	A common and general name must be used. The name describes the nature of the produce.	When a product is in a certain state, then that must be part of the product name to avoid misleading the end consumer. E.g. Dried figs, Peeled and diced mango's.	EU 1169/2011 art. 17.
Language	Not applicable for open trade packages with clearly visible consumer package labels.	The EU requires that the text on the label must be written in one of the official languages of an EU member state and be comprehensible for the consumer.	The EU requires that the text on the label must be written in one of the official languages of an EU member state and be comprehensible for the consumer.	The EU requires that the text on the label must be written in one of the official languages of an EU member state and be comprehensible for the consumer.	In several countries such as Belgium, France, The Netherlands and Germany, there is a national requirement that the language on the label must be one of the official languages of that country.	EU 1169/2011 art. 15; EU 543/2011 (trading units).
Minimum Fontsize	Not applicable.	There is no regulation for minimum fontsize on trading packages.	There is no regulation for minimum fontsize on trading packages.	1,2 mm (if label <80 cm² then 0,9mm).		EU 1169/2011 art. 13 par. 2-3.
Country of Origin	Not applicable for open trade packages with clearly visible consumer package labels.	The full name of the country of origin must be declared on the label. In case the article contains components coming from various countries, the label will contain a list of ingredients detailing the amount and countries of origin for each component.	The full name of the country of origin must be declared on the package label.	The full name of the country of origin must be declared on the label. In case the article contains components coming from various countries, the label will contain a list of ingredients detailing the amount and countries of origin for each component.	Abbreviations or ISO codes such as UK for Great Britain or DE for Germany are NOT allowed.	EU 543/2011 art. 7. and Annex 1; EU 1169/2011 (art. 26); EU 1308/2013 art. 113/1.
Identification of packer or other relevant parties	Not applicable for open trade packages with clearly visible consumer package labels.	The name and address of the packer must be declared. This may be replaced by the officially issued or accepted code mark representing the packer and/or the dispatcher, indicated in close connection with the reference 'Packer and/or Dispatcher' (or equivalent abbreviations).	The name and address of the packer must be declared. This may be replaced by the officially issued or accepted code mark representing the packer and/or the dispatcher, indicated in close connection with the reference 'Packer and/or Dispatcher' (or equivalent abbreviations).	Mandatory. Full name and address of packer or trader. Alternatively can be identified by the name and the address of a seller (retailer) established within the Union, indicated in close connection with the denomination 'Packed for:' or an equivalent denomination.	In case the denomination "Packed for" is used, the labelling shall also include a code mark representing the packer and/or the dispatcher. The seller shall give all information deemed necessary by the inspection body as to the meaning of this code mark.	EU 543/2011 annex 1 part A; EU 1169/2011 art. 8
Quantity: Net content expressed as count or net weight	Not applicable for open trade packages with clearly visible consumer package labels.	The size (sorting) of products for which specific marketing standards apply must be identified in accordance to the standard concerned.	The size (sorting) of products for which specific marketing standards apply must be identified in accordance to the standard concerned.	The quantity in the package is usually expressed as net weight (in grams or kilograms). Net weight is not compulsory for products which are usually sold by number provided that the number of items is clearly visible from outside or the number is mentioned on the label.	Some products loose a considerable amount of their weight or volume. Prepackages can be marketed either fixed or variable weight; In the first case, the weight must reflect the shrinkage (water loss) throughout the supply-chain. EU 543/2011 prevails above EU 1169/2011.	EU 1169/2011 – art. 23 + appendix X; EU 543/2011 art. 6.
Best Before Date/ Expiry Date	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables.	Although it is not mandatory for fresh unprocessed fruit and vegetables the use of best-before-date is encouraged.	EU 1169/2011 – par. 24 + appendix X.
Production Lot number	Not applicable for open trade packages with clearly visible consumer package labels.	A production party identification or lot number is mandatory on the trading package (Crate, Carton, Box).	A production party identification or lot number is mandatory on the trading package (Crate, Carton, Box).	A production party identification or lot number is mandatory on the trading package (Crate, Carton, Box).	A clearly defined Best-Before-Date or Production Date can be used as alternative for the lot number. Otherwise a lot number has to start with the capital "L"	EU 91/2011.
List of Ingredients	Not applicable for open trade packages with clearly visible consumer package labels.	Not applicable for trading packages.	Not applicable for trading packages.	Not applicable for trading packages.	A list of ingredients is not required for unprepared fresh fruit and vegetables nor for products that contain only 1 ingredient and have the name of that single ingredient in the product name. (Cherrytomato contains tomato)	EU 1169/2011 art. 18- par. 1 and 21. EU 1169/2011 Appendix VII art. 19 par. 1 a and e.
Allergenic declaration	Not applicable for open trade packages with clearly visible consumer package labels.	Not applicable for trading packages.	Not applicable for trading packages.	In F&V only applicable for Celery (leaves, stems and roots). This is not compulsory when the name of the allergen is part of the regulated productname. As this always contains the nature of produce an allergenic declaration will never be mandatory in this case.	An allergenic declaration in the list of ingredients must be highlighted (for example CAPITAL, bold or italic).  Voluntary declaration of other allergens such as radish is encouraged.	EU 1169/2011.
Declaration of nutritional value	Not applicable for open trade packages with clearly visible consumer package labels.	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables.	Not applicable for fresh fruit & vegetables.	The distinction between prepared and processed produce is defined in EU 852/2004. EU 1169/2011 defines information requirements for processed products.	EU 852/2004 art. 2 par. 1: definition of processed and unprocessed products EU 1169/2011.
Additives including waxes	Not applicable for trading packages with unprepared fruit and vegetables.	Not applicable for trading packages with unprepared fruit and vegetables.	Not applicable for trading packages with unprepared fruit and vegetables.	Not applicable for trading packages with unprepared fruit and vegetables.	EU 1169/2011 Annex VII part C contains all categories of additives. Waxes used on fruits are considered additives too. Aroma's is a separate category for which the same applies. The EU has published a positive lists of additives and waxes and the quantities that may be used. Note that additives must be declared in the list of ingredients which is not applicable for unprepared fruit and vegetables. A maximum of 10 mg/kg of sulfite can be administered to packages of fruit, e.g. blueberries, lychees and tablegrapes. Excession of this value must be declared as an allergen!	EU 1333-2008; EU 1169/2011 Annex VII part C.
Post Harvest Treatment	Not applicable for open trade packages with clearly visible consumer package labels.	Anti-molding agents added in a post-harvest treatment on citrus fruits must be mentioned on the trade package	Anti-molding agents added in a post-harvest treatment on citrus fruits must be mentioned on the trade package	Anti-molding agents added in a post-harvest treatment on citrus fruits must be mentioned on the package.		EU 543/2011 annex
Protective Atmosphere	Not applicable for trading packages.	Not applicable for trading packages.	Not applicable for trading packages.	Not applicable for trading packages.	The type of gas used for the protective atmosphere should explicitly be allowed in EU 1333/2008	1169/2011 Annex III; EU 1333/2008.
Product dependent information requirement	For products for which the specific marketing standards apply, additional information about Quality Class Size, Variety or Commercial Type and Post-harvest treatment has to be declared either on the product or in close proximity (on the shelf) in accordance with the specific UNECE product standard.				Products with specific marketing standards are: apples, citrus peaches and nectarines, pears, strawberries, sweet peppers, table fruit, kiwi fruit, lettuces, curled leaved and broad-leaved endives, grapes, tomatoes. Providing this information is recommended for all other products covered by UNECE Standards.	EU 543/2011 annex I and art. 3; EU 1243/2007 art. 113/1.

	Prepared or Processed Fruit & Vegetables – Label requirements for Consumer items and Trade Packages		Prepared or Processed – Trading packages		
	<b>Fresh Cut, Prepared/Not Processed: Cut, Cleaned, Diced, Halved, Peeled, Sliced</b> 	<b>Prepared and Processed: Cooked, Dried, Smoked. Transformed incl. addition of additives and mixes with other foodstuff</b> <b>J</b> 	<b>Trading package (case) containing processed consumer item</b> <b>K</b> 	<b>Additional remarks</b>	<b>Relevant Regulation (Source)</b>
Description	Unprocessed fruit and vegetables – Entire fresh fruit and vegetables; – Peeled, cut and shredded fruit and vegetables; – Frozen fruit and vegetables.	Processed fruit and vegetables – Dried fruit and vegetables; – Fruit and vegetables in vinegar, oil or brine; – Fruit and vegetable preparations; – Jam, jellies, marmalades and similar products; – Processed potato products; – Products smoked, cooked or otherwise transformed by heating; – Canned or bottled products.		These definitions for processed and unprocessed fruit and vegetables are only applicable for the labelling process. There are other definitions of prepared for other purposes in other regulations. The distinction between prepared and processed produce is defined in EU 852/2004, EU 1169/2011 defines information requirements for processed products.	EU 852/2004; EU 543/2011 Annex VI contains the categories of processed products; EU 1169/2011.
General	Each consumer item is clearly labelled with description of the item, net weight and either best before date or expiry date in one line of sight.	Each consumer item is clearly labelled with description of the item, net weight and either best before date or expiry date in one line of sight. All information requirement of 1169/2011 apply.	All mandatory information applying to the consumer item must also be displayed on the trading unit (Crate, Carton, Box).	When mandatory information on a consumer item is not visible when packed in a case then the same information must be displayed on the case as well.	EU 543/2011 art. 5 & 6; U 1169/2011 art. 9 part 1, a 12 & 13.
Nature of produce = Regulated product name	A common and general name must be used. The name describes the nature of the produce.	A common and general name must be used. The name describes the nature of the produce.	A common and general name must be used. The name describes the nature of the produce.	When a product is in a certain state then that must be part of the product name to avoid misleading the end consumer. E.g. Dried figs, Peeled and diced mango's.	EU 1169/2011 art. 17.
Language	The EU requires that the text on the label must be written in one of the official languages of an EU member state and be comprehensible for the consumer.	The EU requires that the text on the label must be written in one of the official languages of an EU member state and be comprehensible for the consumer.	No requirements for the language.	In several countries such as Belgium, France, The Netherlands and Germany, there is a national requirement that the language on the label must be one of the official languages of that country.	EU 1169/2011 art. 15; EU 543/2011 (trading units).
Minimum Fontsize	1,2 mm (if label <80 cm <sup>2</sup> then 0,9 mm).	1,2 mm (if label <80 cm <sup>2</sup> then 0,9 mm).	There is no regulation for minimum fontsize on trading packages.		EU 1169/2011 art. 13 par. 2-3.
Country of Origin	The full name of the country of origin of the products must be declared if otherwise it would be misleading for the consumer. A voluntary statement of the origin of the product must be made in such a way that it cannot be confused with the name of the product (Italian tomato sauce made from Spanish tomatoes).	The full name of the country of origin of the products must be declared if otherwise it would be misleading for the consumer. A voluntary statement of the origin of the product must be made in such a way that it cannot be confused with the name of the product (Italian tomato sauce made from Spanish tomatoes).	The full name of the country of origin must be declared on the package label.	Abbreviations or ISO codes such as UK for Great Britain or DE for Germany are NOT allowed.	EU 543/2011 art. 7. and Annex 1; EU 1169/2011 (art. 26); EU 1308/2013 art. 113/1.
Identification of packer or other relevant parties	Full name and address of the producer or the tradename and address of either the brandowner or the seller who places the product on the market. When a product comes from a non EU country and the trading company is not established in the EU, the name and address of the importer.	Full name and address of the producer or the tradename and address of either the brandowner or the seller who places the product on the market. When a product comes from a non EU country and the trading company is not established in the EU, the name and address of the importer.	Full name and address of the producer or the tradename and address of either the brandowner or the seller who places the product on the market. When a product comes from a non EU country and the trading company is not established in the EU, the name and address of the importer.	In case the denomination "Packed for" is used, the labelling shall also include a code mark representing the packer and/or the dispatcher. The seller shall give all information deemed necessary by the inspection body as to the meaning of this code mark.	EU 543/2011 annex 1 part A; EU 1169/2011 art. 8
Quantity: Net content expressed as count or net weight	Net content must be expressed in volume for fluid matter and in weight for solid matter.	Net content must be expressed in volume for fluid matter and in weight for solid matter.	When fresh products for which specific marketing standards apply are used the size must be identified in accordance to the standard concerned.	Some products loose a considerable amount of their weight or volume. Prepackages can be marketed either fixed or variable weight; In the first case, the weight must reflect the shrinkage (water loss) throughout the supply-chain. EU 543/2011 prevails above EU 1169/2011.	EU 1169/2011- art. 23 + appendix X; EU 543/2011 art. 6.
Best Before Date/ Expiry Date	A best-before-date is required on all processed products. Identification of the expiry date (ultimate consumption date) is compulsory for products that are very perishable from microbiological perspective.	A best-before-date is required on all processed products. Identification of the expiry date (ultimate consumption date) is compulsory for products that are very perishable from microbiological perspective.	Declaration of best-before-date or an expiry date is not compulsory for fresh fruit & vegetables.	Although it is not mandatory for fresh unprocessed fruit and vegetables the use of best-before-date is encouraged.	EU 1169/2011 – par. 24 + appendix X.
Production Lot number	A production party identification or lot number is mandatory on the consumer package.	A production party identification or lot number is mandatory on the consumer package.	A production party identification or lot number is mandatory on the trading package (Crate, Carton, Box).	A clearly defined Best-Before-Date or Production Date can be used as alternative for the lot number. Otherwise a lot number has to start with the capital "L"	EU 91/2011.
List of Ingredients	The label has to contain a list of ingredients and quantities in descending order. This list will start with the word: Ingredients. The list of ingredients includes additives.	The label has to contain a list of ingredients and quantities in descending order. This list will start with the word: Ingredients. The list of ingredients includes additives.	Not applicable for trading packages.	A list of ingredients is not required for unprepared fresh fruit and vegetables nor for products that contain only 1 ingredient and have the name of that single ingredient in the product name. (Cherrytomato contains tomato)	EU 1169/2011 art. 18 – par. 1 and 21. EU 1169/2011 Appendix VII art. 19 par. 1 a and e.
Allergenic declaration	Whenever allergens are used in processed food the label shall contain either – an allergenic declaration in the list of ingredients – or elsewhere on the label the literal "Contains" followed by the name of the allergen.	Whenever allergens are used in processed food the label shall contain either – an allergenic declaration in the list of ingredients – or elsewhere on the label the literal "Contains" followed by the name of the allergen.	The allergenic declaration is not required for trading packages.	An allergenic declaration in the list of ingredients must be highlighted (for example CAPITAL, bold or italic).  Voluntary declaration of other allergens such as radish is encouraged.	EU 1169/2011.
Declaration of nutritional value	Declaration of nutritional values is mandatory when the package contains different types of food stuff (e.g. tomatoes with olive oil).	Nutritional values are mandatory.	Declaration of nutritional values is not applicable for trading packages.	The distinction between prepared and processed produce is defined in EU 852/2004. EU 1169/2011 defines information requirements for processed products.	EU 852/2004 art. 2 par. 1: definition of processed and unprocessed products EU 1169/2011.
Additives including waxes	Food additives and food enzymes, belonging to a specified category must be designated in the list of ingredients by the name of that category, followed by their specific name or, if appropriate, E number.	Food additives and food enzymes, belonging to a specified category must be designated in the list of ingredients by the name of that category, followed by their specific name or, if appropriate, E number.	For trading packages containing prepared food the declaration of additives is mandatory.	EU 1169/2011 Annex VII part C contains all categories of additives. Waxes used on fruits are considered additives too. Aroma's is a separate category for which the same applies. The EU has published a positive lists of additives and waxes and the quantities that may be used. Note that additives must be declared in the list of ingredients which is not applicable for unprepared fruit and vegetables. A maximum of 10mg/kg of sulfite can be administered to packages of fruit, e.g. blueberries, lychees and tablegrapes. Excession of this value must be declared as an allergen!	EU 1333-2008; EU 1169/2011 Annex VII part C.
Post Harvest Treatment	See additives	See additives	See additives		EU 543/2011 annex
Protective Atmosphere	If a package contains gas to prolong the shelf life the term 'Packed in, protective atmosphere' should be mentioned on the label.	If a package contains gas to prolong the shelf life the term 'Packed in, protective atmosphere' should be mentioned on the label.	Not Applicable.	The type of gas used for the protective atmosphere should explicitly be allowed in EU 1333/2008	1169/2011 Annex III; EU 1333/2008.
Product dependent information requirement	For products for which the specific marketing standards apply, additional information about Quality Class Size, Variety or Commercial Type and Post-harvest treatment has to be declared either on the product or in close proximity (on the shelf) in accordance with the specific UNECE product standard.			Products with specific marketing standards are: apples, citrus peaches and nectarines, pears, strawberries, sweet peppers, table fruit, kiwi fruit, lettuces, curled leaved and broad-leaved endives, grapes, tomatoes. Providing this information is recommended for all other products covered by UNECE Standards.	EU 543/2011 annex I and art. 3; EU 1243/2007 art. 113/1.

## Additional Information

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<http://www.gs1.eu/>

GS1 Member Organisations in Europe

[http://www.gs1.eu/gs1\\_mo\\_list](http://www.gs1.eu/gs1_mo_list)

GS1 Global Office

[www.gs1.org](http://www.gs1.org)

UNECE Standards for Fresh Fruit and Vegetables (FFV)

[www.unece.org/trade/agr/standard/fresh/FFV-StandardsE.html](http://www.unece.org/trade/agr/standard/fresh/FFV-StandardsE.html)

UNECE Standards for Dry and Dried Produce (DDP)

[www.unece.org/trade/agr/standard/dry/DDP-Standards.html](http://www.unece.org/trade/agr/standard/dry/DDP-Standards.html)

EU Regulation on Fruit & Vegetables EU 543/2011

<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1440416805211&uri=CELEX:32011R0543>

EU Regulation on Fruit & Vegetables EU 1169/2011

<http://eur-lex.europa.eu/legal-content/EN/TXT/?qid=1440416220903&uri=CELEX:32011R1169>

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