



# European Union food labelling requirements and plant-based products: legal compliance and composition analyses in the context of sustainable food systems.

## Fresh fruit & vegetables

Fresh, unprocessed fruit and vegetable products are subject to different labeling requirements than other food products. The minimum requirements are name and country of origin. Furthermore, depending on the method of sale to the end consumer, the variety (respectively), quality class, country of origin of the producer, and weight/number of pieces (respectively) must be provided.

## Processed fruit & vegetables

Primarily Regulation 1169/2011. Mandatory are: name, the ingredients list with allergen highlighting, quantity of certain ingredients (depends from products, mixture), the nutrition declaration in standardized tabular format, and date marking ("best before" or "use by" depending on the product), storage conditions, country of origin, producers' name.

## REGULATIONS

- Reg. 1169/2011
  - general food information,
- Reg. 2023/2429
  - fresh produce marketing standards,
- Reg. 1308/2013
  - common market organization,
- Other, pointed in above.

## Mandatory

- ✓ **Common name**, "a designation of origin", „a geographical indication"
  - Reg. 1169/2011
  - Reg. 1308/2013
  - Reg. 2023/2429
- ✓ **Variety/type** (where specified)  
For products listed.
  - Reg. 2023/2429, art.7, ANNEX 1
- ✓ **Quality class**  
Dependently of the fruit/vegetable variety. Extra, I, II and a size.
  - Reg. 2023/2429, art.7
- ✓ **Country of origin**  
Full country name where the product was grown.
  - Reg. 1169/2011 art.26
  - Reg. 2023/2429
- ✓ **Packer/dispatcher identity**  
Name and full address of the operator responsible for placing the product on the EU market.
  - Reg. 1169/2011
  - Reg. 2023/2429
- ✓ **Net weight or count**  
Net quantity expressed in (k)g or number of units (with exceptions).
  - Reg. 1169/2011

- its legal/customary/descriptive name
- not replaced with a name protected as intellectual property, brand name or fancy name (1169/2011, art.17)
- "a designation of origin/"a geographical indication" - the name of a region, a specific place or a country used to describe a product (1308/2013, art.92-93)
- the name of the variety (where appropriate) (2023/2429)

- e.g. glazing agents - wax on the fruits (1169/2011, ANNEX VII),
- in citrus - preserving agent or other chemical substances used at post-harvest stage (2023/2429, ANNEX I)
- if durability has been extended by means of packaging gases authorized pursuant to Regulation (EC) No 1333/2008, appropriate declaration needed (1169/2011, ANNEX III/1.1)

- „...information particulars required at retail stage should not include terms such as 'supreme', 'premium' or similar wording which are not regulated for defining an actual quality of the product..." ((16) 2023/2429)

- clearly visible from the outside (if palletized - a notice placed on at least two sides of the pallet),
- not misleading the consumer (1169/2011, art.26; 2023/2429 ANNEX1/Part A/4/B)

- Best before ...' when the date includes an indication of the day (1169/2011 art. 24, ANNEX X)

- for all packages (except for pre-packages) accepted is code mark
- for pre-packages only, the name and the address of a seller (2023/2429 ANNEX1/Part A/4/A)

- the storage conditions and/or time limit for consumption shall be indicated (1169/2011 art. 25)

- not mandatory for unprocessed products (a single ingredient or category of ingredients)
- the mandatory nutrition declaration should refer to 100 g (ml) and, if appropriate, to allow additional portion-based declarations (1169/2011 (35))

- not mandatory: considerable losses in their volume or mass and which are sold by number/weight in the presence of purchaser (1169/2011 ANNEX IX/1)

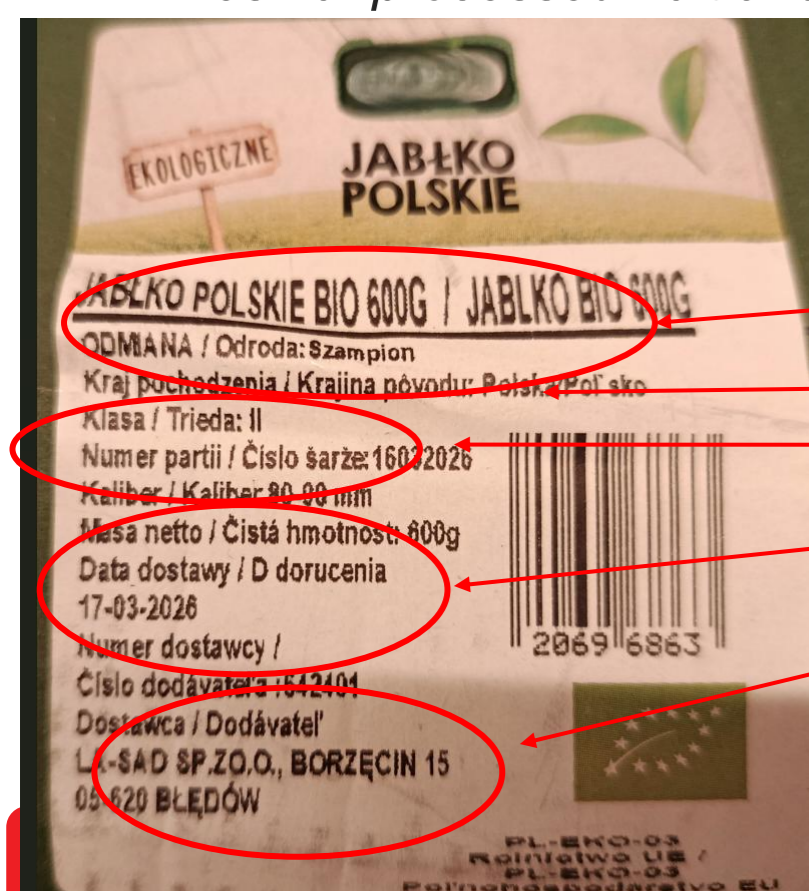
## Conditional

- ✓ **Post-harvest treatment/ packaging gases**  
All substances for surface treatments or to maintain quality must be declared.
  - Reg. 1169/2011 ANNEX III/VII
  - Reg. 2023/2429 ANNEX I

## Also required

- ✓ **Best-before date**  
Not mandatory only for fresh fruit and vegetables, including potatoes (not peeled, cut or similarly treated; not apply to sprouting seeds and similar products such as legume sprouts).
  - Reg. 1169/2011 art.24
- ✓ **Storage conditions**  
When a best-before date is given. Conditions needed to achieve the shelf life.
  - Reg. 1169/2011 art.25
- ✓ **Nutrition declaration**  
Mandatory for processed food: energy value, the amounts of fat, saturates, carbohydrate, sugars, protein and salt.
  - Reg. 1169/2011 art.30

Fresh unprocessed fruit and vegetables sold loose are exempt from most labelling requirements only country of origin and product name must be displayed at point of sale.



- Ecological apples, on the label are given:
- Name of the product and variety
  - Country of origin
  - Class, size
  - Bath number/delivery date
  - Distributor
- Dependently of certain country regulation

- Processed food (mixture: carrot, parsley and celery root, leak). All washed, celery cut.
- Name
  - Net weight
  - Country of origin
  - List of ingredients with emphasized allergens
  - Best before date and storage conditions
  - Distributor

