

Not for EU Labelling

If you manufacture or sell products in the UK, you may have started seeing the phrase “Not for EU” appearing on packaging — particularly within the food and drink sector. But what does it actually mean, when is it required, and does it apply to food supplements?

Here, we break down the Not for EU labelling requirements, with a particular focus on food supplements, and what UK businesses need to be aware of moving forward.

Why has ‘Not for EU’ labelling arisen?

Not for EU labelling is a **post-Brexit UK requirement** designed to **prevent goods that meet UK-only standards from entering the EU Single Market**.

The requirement exists largely because of Northern Ireland’s unique position following Brexit. Although Northern Ireland is part of the UK, it shares an open land border with the EU via the Republic of Ireland. As a result, **products placed on the Northern Ireland market can potentially move into the EU**.

In short, Not for EU labelling **allows goods produced to UK regulations to move freely within the UK**, including Northern Ireland, **without having to comply with EU legislation** — provided it is clear that they are not intended for the EU market.

When is a ‘Not for EU’ label necessary?

Even if your product may require Not for EU labelling, it is not automatically required. **It is only needed when ALL of the following apply:**

- The product is placed on the Great Britain market, and
- It is moved to or sold in Northern Ireland under the Northern Ireland Retail Movement Scheme (NIRMS), and
- The product does not comply with EU rules

It is **NOT required where:**

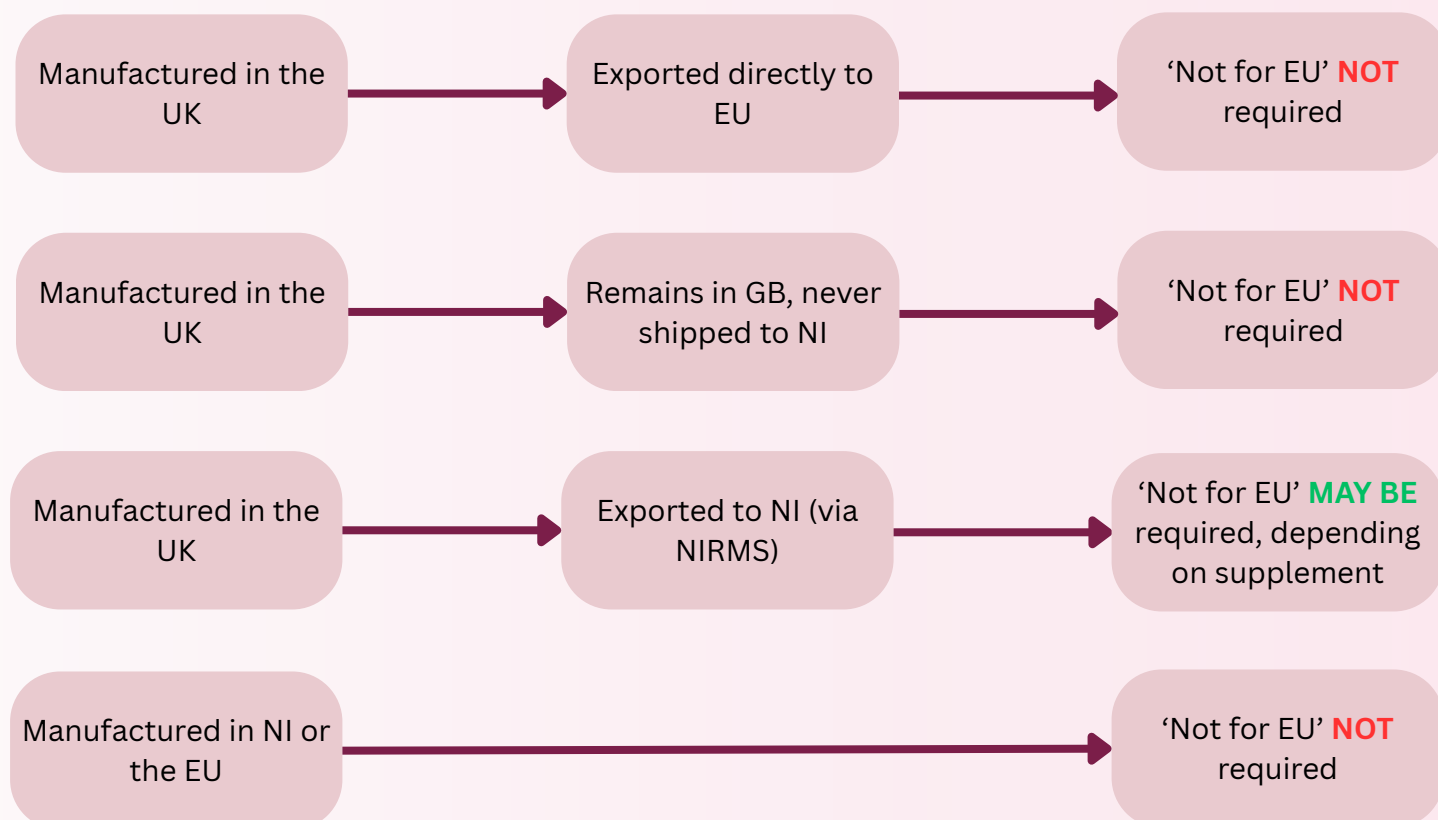
- Goods are exported directly from Great Britain to the EU (in this case, they must already comply with EU law)
- Goods are sold only in Great Britain and never enter Northern Ireland
- Goods are manufactured in Northern Ireland or the EU (they must already comply with EU law in this case)

What products may require a ‘Not for EU’ label?

The requirement applies across several sectors, but it is **most commonly encountered in the food and drink industry**, particularly for products containing **products of animal origin (POAO)**. This is because animal-derived foods are **considered higher risk under EU law**.

Products that may require Not for EU labelling include:

- Meat, fish and dairy products
- Fruit and vegetables
- Some other specified goods of plant/animal origin (as listed by UK Government guidance)



Not for EU Labelling - *Food Supplements*

Not for EU labelling is a post-Brexit UK requirement that has particular relevance for food supplements. Its purpose is to prevent products manufactured to UK-only standards from entering the EU market, ensuring compliance with EU rules is maintained.

This is especially important for food supplements, which may contain ingredients of animal origin or other components that are subject to stricter EU controls. In this guide, we focus on when and why food supplement businesses in the UK may need to apply a 'Not for EU' label, helping manufacturers and distributors navigate the rules with confidence.

How does Not for EU labelling affect food supplements?

The good news is that **most food supplements do not currently require Not for EU labelling.**

This is because **UK and EU food supplement regulations remain largely aligned**, and supplements are generally considered lower-risk foods. That said, **there are important exceptions**, and each product should be assessed on a **case-by-case basis**. And as **UK and EU regulations grow further apart** post-Brexit, more and more supplements are likely to require this labelling.

Responsibility for Not for EU labelling sits squarely with the Food Business Operator (FBO).

And, importantly, the Not for EU statement **does not replace any other mandatory labelling requirements** – it is an additional requirement where applicable.

How should 'Not for EU' appear on packaging?

There is **no prescriptive format** for how Not for EU must appear on packaging, but **general food labelling principles** still apply:

- The wording must be exactly "Not for EU"
- The statement must be visible, legible and indelible
- Minimum font size requirements must be met

It is also possible to **apply the statement to secondary packaging only**, provided that:

- The outer box or crate containing the individual products is clearly labelled Not for EU, and
- Retail premises in Northern Ireland ensure customers can clearly see that the products are not for EU sale (for example via shelf-edge labelling with the words 'Not for EU'.)

So, when does a food supplement require a 'Not for EU' label?

The main scenario where food supplements require Not for EU labelling is when they are **produced solely from animal-derived ingredients, and contain no added plant-based ingredients.**

However, supplements that contain **a mix of plant ingredients and processed animal products**, and are packaged for the final consumer, are **generally exempt** under current regulation.

In addition, Not for EU labelling is also required where a supplement **contains ingredients that are authorised in the UK but not permitted under EU law.** This includes certain novel foods, vitamin or mineral sources, and botanicals.

- A common example is titanium dioxide (E171). While it remains permitted as a food additive in the UK, it is no longer authorised in the EU. A GB-manufactured supplement containing titanium dioxide that is moved to Northern Ireland under NIRMS must therefore display Not for EU labelling.

A fish oil supplement, where none of the excipients are plant-derived

Produced solely from animal-derived produce, with no plant-based components

'Not for EU' **IS** required

A supplement containing bovine-derived collagen, with no other ingredients

Produced solely from animal-derived produce, with no plant-based components

'Not for EU' **IS** required

If either of the above contained a plant-derived sweetener or capsule shell

Produced from a mixture of animal-derived and plant-based components

'Not for EU' **NOT** required