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Practical Guide: Food Labelling Regulations

EU 1169/2011 · Front-of-pack · Environmental claims

— Everything you need to know

Why does this matter now?

The European food labelling regulatory framework is in full evolution. It is not just about Regulation 1169/2011, new front-of-pack requirements, environmental claims and digital transparency are transforming what is expected of distributors and manufacturers.

In simple terms: before, it was enough to list the ingredients on the label. Today, Europe requires consumers to understand at a glance how healthy and sustainable each product is.

30%

of RASFF alerts in 2024 were for undeclared allergens

RASFF Annual Report 2024

€50K+

average fine for labelling non-compliance in the EU

Source: AESAN / national authorities

2027

target date for harmonised front-of-pack implementation

European Commission Proposal

The risk is not only economic
An incorrect label can lead to product recalls, health alerts and reputational damage. Proactive product data management is the best defence.

This guide covers three regulatory pillars:

1

EU 1169/2011

Mandatory food information to the consumer

2

Front-of-pack

Nutri-Score and front-of-pack nutritional labelling

3

Green Claims

Environmental claims and eco-labelling

EU 1169/2011: The Essentials

Regulation (EU) No 1169/2011, in force since December 2014, establishes the requirements for food information to consumers throughout the European Union. Nutritional information has been mandatory since 13 December 2016.

In simple terms: it is the 'identity card' of every food product. It requires that consumers know exactly what is in what they buy.

The 9 mandatory particulars (Art. 9)

- o Name of the food
- o List of ingredients (with allergens highlighted)
- o Net quantity of the food
- o Date of minimum durability or use-by date
- o Special storage and/or conditions of use
- o Name or business name and address of the operator
- o Country of origin or place of provenance (where applicable)
- o Nutrition declaration (7 mandatory elements)
- o Alcoholic strength by volume (beverages >1.2% vol.)

The 7 mandatory nutrients

Energy value (kJ/kcal) · Fat · Saturates · Carbohydrate Sugars · Protein · Salt
Expressed per 100g or 100ml. Minimum font size: 1.2 mm

The 14 mandatory allergens

According to Annex II of Regulation 1169/2011, these 14 allergens must be highlighted (bold, uppercase or colour) in the ingredients list. Failure to declare them is the leading cause of RASFF alerts.

1 Gluten-containing cereals Wheat, rye, barley, oats, spelt...	2 Crustaceans Crabs, langoustines, prawns...
3 Eggs And egg-based products	4 Fish And fish-based products
5 Peanuts And peanut-based products	6 Soya And soya-based products
7 Milk / Lactose Including lactose	8 Tree nuts Almonds, hazelnuts, walnuts, cashews...
9 Celery And celery-based products	10 Mustard And mustard-based products
11 Sesame Sesame seeds and derivatives	12 Sulphur dioxide / sulphites At concentrations >10 mg/kg
13 Lupins And lupin-based products	14 Molluscs Mussels, clams, squid, octopus...

Warning!

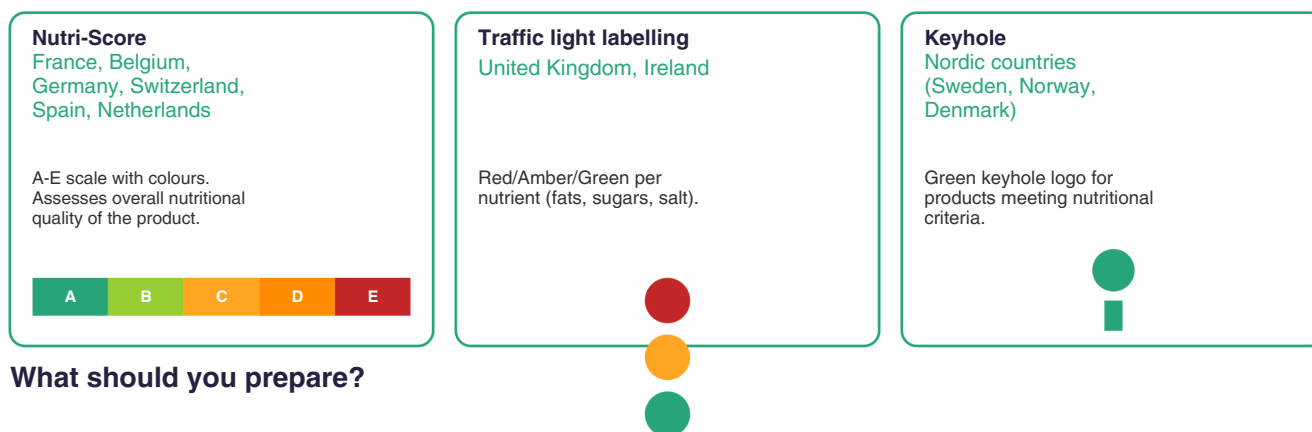
An undeclared allergen can trigger a RASFF alert, product recall and direct legal liability.

Front-of-pack: what's coming

The European Commission is working on a harmonised front-of-pack nutritional labelling system for the entire EU. Although the exact date for mandatory implementation is pending, several countries have already adopted voluntary systems.

In simple terms: it's like hotel star ratings, but for the nutritional quality of food. A quick glance at the front of the pack tells you whether the product is more or less healthy.

Front-of-pack systems in Europe



What should you prepare?

- Ensure that the nutritional data for each product is complete and up to date
- Calculate the Nutri-Score for your catalogue (algorithm publicly available)
- Identify products with low scores for reformulation or communication
- Digitise information to generate labels quickly in response to regulatory changes

Environmental claims

The Green Claims Directive (proposal 2023/0085) aims to end 'greenwashing' in the EU. It prohibits generic environmental claims such as 'eco-friendly', 'sustainable' or 'planet-friendly' without verifiable evidence.

In simple terms: you can no longer put 'green product' on the label just because it sounds good. Now you have to be able to prove with data why it is green.

What you can NO LONGER say	What you CAN say
× "Eco-friendly product" (without certification)	✓ "Packaging with 30% recycled plastic (certified by [body])"
× "100% sustainable"	✓ "20% reduction in CO2 emissions in production (2022-2024)"
× "Environmentally friendly"	✓ "Ingredients from EU-certified organic farming"
× "Natural" (no legal definition)	✓ "FSC paper from responsibly managed forests"
× "Carbon neutral" (without verification)	✓ "Water footprint verified by [certifying body]"

Source: Proposal for a Directive on environmental claims (Green Claims), COM/2023/0166 final

The 5 most common errors

These are the mistakes we see most frequently in product catalogues. Each one can trigger an alert, a penalty or a loss of consumer trust.

1

Allergens not highlighted in the ingredient list

The regulation requires allergens to be typographically distinguished (bold, CAPITALS or colour). Simply listing them is not enough.

30% of RASFF alerts (2024)

2

Incomplete or outdated nutritional information

One of the 7 mandatory nutrients is missing, or the values do not match the current product formula.

Frequent cause of rejection in IFS audits

3

Incorrect language for the target market

Information must be in the official language of the country where the product is marketed. A product for Spain with a label only in English does not comply.

Art. 15 of Regulation 1169/2011

4

Expiry dates in non-standard format

The format must be "best before" or "use by". Abbreviations such as "exp:" or "bb:" do not comply.

Art. 24 of Regulation 1169/2011

5

Nutritional claims without legal basis

"Low fat", "light", "high in fibre" — each has specific criteria defined in Regulation 1924/2006. Using them without meeting the criteria is an infringement.

Regulation (EC) 1924/2006

Compliance checklist

Use this list to verify that your product catalogue meets current regulatory requirements. Tick each item that is in order.

Mandatory information (EU 1169/2011)

- ☐ Food name correct and not misleading
- ☐ Complete ingredient list with allergens highlighted
- ☐ Nutrition information with all 7 mandatory elements
- ☐ Use-by / best-before date in correct format
- ☐ Country of origin declared (where applicable)
- ☐ Operator details (name and address) visible
- ☐ Minimum font size respected (1.2 mm / 0.9 mm)

Front-of-pack (preparation)

- ☐ Complete nutritional data for Nutri-Score calculation
- ☐ Nutri-Score calculated for main products
- ☐ Products with low scores identified

Environmental claims

- ☐ Generic environmental claims removed or replaced
- ☐ Environmental certifications current and documented
- ☐ Verifiable evidence available for each claim

Data management

- ☐ Technical data sheets digitised and centralised
- ☐ Update process defined for regulatory changes
- ☐ Labelling version history accessible

Total met: __ / 16

If you have fewer than 12, your catalogue needs urgent attention before the next regulatory cycle.

How Alimentium helps you comply

Alimentium centralises, validates and distributes all product information — ensuring that every technical data sheet, label and nutritional data point complies with current regulations.

In simple terms: instead of chasing data through email and Excel, Alimentium collects it, organises it and verifies it automatically.



Data Master Manager

Manages all product information in one place, with fields adapted to Regulation 1169/2011. Automatic data validation via AI.



Data Hunter

Collects supplier data in any format (PDF, Excel, image) and automatically converts it into a standardised digital format.



Data Delivery

Distributes updated information to clients and channels. When a data point changes, all recipients receive the correct version.



Regulatory validation

Automatically verifies that mandatory fields are complete: allergens, nutrition, origin, dates. Alerts when something is missing.



Data sheet generation

Generates food product technical data sheets ready to share with distributors, retailers and procurement platforms.

Need to verify your catalogue?

REQUEST YOUR DEMO

Sources and resources

All information in this guide is based on official European sources and sector reference publications. Consult the original resources for further detail.

Regulation (EU) No 1169/2011

Food information provided to the consumer
eur-lex.europa.eu — CELEX:32011R1169

Regulation (EC) No 1924/2006

Nutrition and health claims
eur-lex.europa.eu — CELEX:32006R1924

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Rapid Alert System for Food and Feed
ec.europa.eu/food/safety/rasff

Green Claims Directive Proposal

COM/2023/0166 — Environmental claims
eur-lex.europa.eu — COM:2023:0166:FIN

AESAN

Spanish Agency for Food Safety and Nutrition
aesan.gob.es

IFS Food Standard v8

Certification standard for food audits
ifs-certification.com

DigiComply

Food regulatory intelligence platform
digicomply.com

EFSA

European Food Safety Authority
efsa.europa.eu

Alimentium

Centralises, validates and distributes product information for the food sector.
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