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GS1 in Europe Information on How to Comply with the EU Regulation on Food Information to Consumers

V1.0 - March 2014

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Leadership in implementation

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Preamble

These guidelines are intended for use by GS1 Member Organisations (MOs). They have been written so that they may be quoted in full or in part, in translation or in English, by MOs when they communicate with their members.

Introduction

The 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.

The regulation also sets out new requirements for information that should be provided to consumers for food that is sold at a distance, for example on a website. All obligatory declarations, excluding the use by date and best before date, are to be made available to the consumer before the purchase is concluded, either by way of material supporting the distance selling or by another appropriate means clearly identified by the food business operator.

The new rules have been possible to apply since December 2011, when a transition period started. The rules must be applied from 13 December 2014.

The "Mandatory Particulars"

The product data that must be shown on the labels of packaged foods are:

(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 allergens 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 importer's 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.

Each of these is described in more detail in the regulation and in guidance notes available from official bodies (e.g. questions and answers) and trade associations (e.g. FoodDrinkEurope).

The regulation also applies to foodservice companies ("mass caterers") such as restaurants, cafes, bars and canteens to the extent that communication of allergens as described in (c) above is mandatory. These companies must also comply with article 14 regarding distance selling if they take orders for food on a website, over the telephone or remotely by any other means.

Can GS1 standards assist compliance?

GS1 standards, services and solutions are relevant to three aspects of the regulation:

- The quality of the product data required by the regulation.
- The communication of the required data between trading partners.
- Managing product variations in the context of distance selling.

Data Quality

Testing and analysis of foodstuffs to determine that the information on their labels is correct is beyond the scope of GS1. This section is concerned with ensuring that the information on the physical label, which is taken as the definitive version, matches the corresponding electronic version(s) communicated to trading partners and third parties.

Several European GS1 MOs are engaged in various activities assisting brand owners in ensuring their product data is of high quality.

Data Quality Framework

One tool that is available is the GS1 Data Quality Framework, which is a set of recommendations aimed at assisting brand owners with the internal processes that support the creation of high quality master data.

GDSN Validations

GS1 MOs offering GDSN Certified Data Pool services to their trading partner communities also, by default, offer validations of the data, since many validations are performed by the GDSN Data Pools as part of the GDSN certification criteria. Service providers and some data pools offer additional validation and checking required by the trading community in their market. However, validation of the data alone supports consistency of the information, but does not guarantee that the data is actually correct.

Quality Assurance with Product Sample

In order to improve the data quality beyond what can be achieved with automatic validations, some GS1 MOs and other service providers offer a quality assurance of the item information, by comparing the information with a sample of the product. With this process, it is made sure that the digital item information from the brand owner matches the information printed on the package, as well as physical dimensions, package type, etc. If errors are detected, the information provider is asked to make the necessary updates and republish the information.

Data Creation Based on Product Sample

There are several services in Europe that will transcribe product information from the packaging itself and provide it electronically to on-line retailers. These services will often bundle this "back of pack" data with dimensions and weights (of the consumer units) and with product images suitable for inclusion in web pages. These companies will have their own

quality assurance and checking mechanisms and will get the data signed off by the brand owner.

Internal Systems

Using a single source of data for all relevant purposes ensures consistency. If the food manufacturer communicates product information electronically to trading partners, the data should come from the same source as the data used to design the packaging or label (for example a product information management system).

Communicating the Data Between Trading Partners

What Communication is Required?

The regulation requires communication of product data between trading partners in the supply chain. Examples of this requirement include:

- A general requirement (article 8.3) for everyone in the supply chain "on the basis of the information in their possession as professionals" to take responsibility for compliance. They must take responsibility for any information they change (article 8.4) and must not distribute information they know to be wrong.

- Suppliers of ingredients to food manufacturers, such as suppliers of agricultural and horticultural products and chemical ingredients, must provide all information about their products that is needed for food manufacturers (ie. their customers) to be able to comply (article 8.8).

- Suppliers of bulk product packers to foodservice operators must provide the information that is required for their customers to fulfil their obligations (article 8.6).

- The mandatory information on the food product's label must also be given on websites used for on-line sales or on other distance selling platforms (article 14). Although not required by the regulation, suppliers of food can assist on-line retailers by providing the necessary information in advance of the sales so that web-pages including the information can be designed.

Why Standards are Vital to Communication

The responsibilities placed on food business operators to supply information can only be met by effective communication between businesses in the food supply chain. GS1 standards are the best way to communicate the information effectively. The food industry comprises a web of interrelated and overlapping supply chains involving many companies. In this context, data communicated according to an individual company's style or format is likely to cause misunderstanding, more work and error. Standards are needed so that all companies in all parts of the industry can understand and use each other's information.

Every item of mandatory information in the EU 1169/2011 regulation is addressed in GS1's data standards. Use of these data standards is the foundation for communicating the food information to comply with the law.

Methods of Communication

GS1 provides a number of "share" technologies to effect the communication.

The preferred mechanism for communicating the information required by EU 1169/2011 is via the Global Data Synchronisation Network (GDSN). This is a network of data pools certified by GS1. Certification requires, amongst other things, the ability to handle a specified set of data elements formatted according to GS1 standards. This data set includes all the information required by EU 1169/2011. Code values relevant to, for example, the allergens and nutrients listed in the regulation, are also specified in the GDSN standards. A supplier who provides data to a certified data pool can make it available to any or all of his trading partners that are connected to the network.

Some retailers are not connected to GDSN. They are able to get product information relevant to consumers (as opposed to business-to-business data) from GS1 Source (formerly known as Trusted Source of Data). This is a service that enables non-GDSN enabled suppliers to share their product data with retailers and with web and mobile application developers. GS1 source can also be fed with consumer-facing product data by GDSN.

GS1 also develops and publishes standards for electronic data interchange (EDI) to enable transaction data and master data to be communicated from point to point in a way that supports automatic processing by the recipient. The EANCOM® Price-Catalogue message (PRICAT) includes all the mandatory data in EU 1169/2011 as well as appropriate code values. Some GDSN data pools also offer the facility to use PRICAT to upload data to the GDSN Network.

It may be that some companies insist on non-standard mechanisms (such as web-portals) to receive the required data. Although GS1 would not recommend this approach, where it is used it is still essential to use GS1 standard data if confusion and misunderstanding are to be avoided.

The table in Appendix A shows how the mandatory information in EU 1169/2011 corresponds to the GS1 standard data in GDSN, GS1 Source and the PRICAT message.

In addition GS1 in Europe maintains a schedule showing which approaches are available and preferred in the different countries in Europe. To access this schedule, contact GS1 in Europe.

Product Variations

Distance Selling

Article 14 of the regulation states:

"In the case of pre-packed foods offered for sale by means of distance communication:

(a) mandatory food information, except [the date of minimum durability or the "use by" date], shall be available before the purchase is concluded and shall appear on the material supporting the distance selling or be provided through other appropriate means clearly identified by the food business operator. When other appropriate means are used, the mandatory food information shall be provided without the food business operator charging consumers supplementary costs;

(b) all mandatory particulars shall be available at the moment of delivery."

In most cases use of the GS1 Data Quality Framework and the timely and effective communication of GS1 standard data from food manufacturers to on-line retailers, as described in the preceding sections, will ensure that the mandatory data is available to be placed on the retailer's website (or other distance selling platform). Communication of GS1

standard data through channels recommended by GS1 promotes compliance with the regulation.

However a difficulty arises when a food is changed in a way that requires a corresponding change to the mandatory data shown on the label. In these circumstances there will be a period of time when the old version of the product and the new version coexist in the supply chain. During this period it is not possible for the retailer to know if the version of the product ordered on a website will be available at the time and place the order is picked.

Retailers working to GS1 standards use GTINs to pick on-line orders. If a product variant is given a new GTIN it increases the possibility that the correct variant can be made available for picking and, even if it is not available at the pick point, the retailer can recognise automatically if the version being picked is different from the version that was ordered. In this latter case the product can be offered as a substitute when the goods are delivered and the consumer can choose whether to accept it or not.

GTIN Allocation Rules

However current GTIN allocation rules specify that some minor changes in the mandatory product data should not be given a new GTIN. If a new GTIN is not allocated, it is very difficult for the retailer to distinguish between the two versions at the pick point.

It might be thought that this could be solved by changing GTIN allocation rules such that all changes in mandatory product information require a new GTIN. But the rules have been developed and agreed by manufacturers and retailers (and others) on the basis of good supply chain practice. Giving a new GTIN to every variation that is relevant to the regulation would result in significant costs, errors and inefficiencies, many of which would damage consumers' interests.

Impact of identifying variants with new GTINs

Experience shows that attempting to treat a variant of a product as a new product causes out of stocks, unintended distribution voids and de-listings, all of which result in lost sales. Waste is caused by remnant inventory and replenishment errors. Managing the change results in administrative and other costs. Trading partners across the supply chain report significant impact to their annual sales and costs. One manufacturer has reported typical annual lost sales due to product variant GTIN changes as 6.7% of annual revenue. One retailer reported 6,000-8,000 GTIN changes per year, leading to 2-3% of additional administrative and support costs and total sales impacted by 1%. If the GTIN had to change for every new minor variant of a product, they forecast the number of changes per year could rise to 20,000-25,000, leading to a significant increase in further additional administrative and support costs. The total sales impact is hard to forecast, but would be considerably greater than the 1% impact experienced today.

Unnecessary costs caused to the industry inevitably impact the consumer eventually.

There are more direct effects on consumers. Discontinuities caused by regarding a variant of a product as a new product would severely inhibit retailers' ability to respond to consumer demand by ensuring the products they want are in stock and on the stores' shelves. Customers who shop on-line would find that features they value, such as displaying their favourites and recent purchases, would not work for substituted products: they would have to search again from scratch because the products they had previously bought would appear to be unavailable even though they had merely changed a little. It is likely that most consumers place more value on finding the products they want than having precise information about insignificant changes to those products.

Sometimes food manufacturers make minor changes to their products. These changes are often intended to benefit the consumer, improve the production process or reduce production costs. For example several food manufacturers have gradually reduced the salt content of their products and treated each evolution of the product formula as the same stock keeping unit for the purposes of supply chain management. Manufacturers could be discouraged from making

improvements that benefit the consumer (or others) if each change had to be regarded as a new product because it would result in cost and disruption as previously outlined.

Relevant GTIN Allocation Rules
The table in Appendix B shows the mandatory information listed in the 1169/2011 regulation and the relevant GTIN allocation rule(s) for each mandatory particular. It shows whether or not the current rules require a new GTIN to be given.
Manufacturers should always change the GTIN if in their opinion there is any risk to consumer health arising from confusing one variant of a food with another during the transition between them. This is consistent with the rules. For example rule 4.2.2 states explicitly that addition or removal of an allergen should result in a new GTIN to identify the product. Manufacturers should also allocate a new GTIN if they believe the change in the product would affect the buying decisions of consumers of that product.
The table in Appendix B maps the mandatory information listed in the 1169/2011 document to the GTIN allocation rules. This table is purely advisory and intended to help in deciding when a new GTIN is needed.

Managing Minor Variants
On-line retailers of food might find alternatives to the GTIN for differentiating minor variants, perhaps involving manual intervention for those products that are in transition from one minor variant to another. It is vital that the food manufacturer provides the maximum of information to help to manage the transition. For example the data required by the 1169/2011 regulation that is changing, the date when the new variant will be first shipped and the earliest expiry or best before date of the new variant. GS1 in Europe has published a document entitled *Possible option on how to handle product variants when selling online which* advises on how process improvements and focused communication of product attributes can help in getting the right variant to the consumer.
Some retailers might request allocation of new GTINs for variants despite the GTIN allocation rules and with associated problems described above. Compliance with such requests or otherwise is a commercial decision for the manufacturer.
Ideally national jurisdictions will enforce the regulation such that some divergence from a strict interpretation of article 14 is tolerated in the case of variations that do not have a significant impact on consumers or their purchasing decisions. On-line retailers could decide to have a note of caution on the website to the effect that small changes are sometimes made to food products and during the transition it might not be possible to deliver the precise variant that was ordered.

Future Solution
Industry has been developing new ways of working so that in future it will be possible to distinguish product variants without disrupting the supply chain. The idea is that the identification numbers currently used in supply chain management would be supplemented by another code that would identify the variant specifically. The identification number and the variant code together would be represented as a bar code and could be used to pick orders placed by the consumer on-line so that either the variant in the order is picked or, if it isn't in stock, the variant that is delivered can be shown as a substitute.
The variant code is currently being designed but it is not expected to be aimed at use in supply chain processes between manufacturers and retailers, because that would introduce unnecessary costs. It could be used to pick online consumer orders or provide sales data specific to the variant. Consumers could have access to variant-specific data by scanning the identification number and variant code to retrieve data from web pages.
This new way of working cannot be introduced immediately. To process the new code will require manufacturers and retailers to re-program their systems. Furthermore retailers would have to upgrade their point of sale equipment to be capable of scanning the new bar code that would be required. Most manufacturers would not be prepared to print two bar codes on their

products (partly because they need space on the pack to print legally required information) and could not substitute the new symbol for the old until they are confident that the majority of their retail customers are able to scan the new version. It might take several years before this happens across the European Union, although adoption might be quicker in some countries than others.

The expectation is however that in due course it will become easier to respect a strict interpretation of article 14 of the regulation by using this variant code.

Appendix A

EU regulation Article	Requirement	GDSN name	GDSN availability	Type	PRICAT D01B	TSD name	Remarks
9.1 a, 17	the name of the food	regulatedProductName (AVP)	AVP	an..500	SG36 - FTX Segment DE4451 = Z08 DE4453 = 1 DE4440 = regulated ProductName DE4440=Data	regulatedProductName	**Regulation** 1. The name of the food shall be its legal name. In the absence of such a name, the name of the food shall be its customary name, or, if there is no customary name or the customary name is not used, a descriptive name of the food shall be provided. 2. The use in the Member State of marketing of the name of the food under which the product is legally manufactured and marketed in the Member State of production shall be allowed. However, where the application of the other provisions of this Regulation, in particular those set out in Article 9, would not enable consumers in the Member State of marketing to know the true nature of the food and to distinguish it from foods with which they could confuse it, the name of the food shall be accompanied by other descriptive information which shall appear in proximity to the name of the food. 4. The name of the food shall not be replaced with a name protected as intellectual property, brand name or fancy name or the ustomary name is not used, a descriptive name of the food shall be provided. **AVP Definition** - regulatedProductName The prescribed, regulated 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 country specific regulation.

9.1 b 9.1 d	the list of ingredients the quantity of certain ingredients or categories of ingredients	ingredientState ment (F&B) ingredientState mentFormatting Pattern AVP)	now	an..40 00	ingredientStateme nt (F&B) SG36 – FTX Segment DE4451 = BLY DE4453 = 1 DE3453 = ISO639 DE4447 = Link DE4440 = ingredientStateme nt DE4440=Data (FTX segment can be repeated If needed) ingredientStateme ntFormattingPatte rn AVP) SG36 – FTX DE4451=Z08 DE4453=1 DE4440= ingredientStatement FormattingPattern DE4440=Data	ingredientStatement	**Mandatory:** ingredientStatement (long description). Exact copy of ingredient statement on packaging. The percentages can be included in this statement. E.g. tomatoes (20%), water, salt. This also applies for categories. **Optional:** ingredientName, ingredientSequence, ContentPercentage, fishCatchZone and ingredientCountryOfOriginCode (if ingredients must be specified individually or **Mandatory** when the fish catch zone needs to be indicated)
		ingredientName (optional) ingredientSeque nce (optional) ContentPercent age (optional) fishCatchZone (optional) ingredientCountr	now	an..70 n..1/12 n 1/5,2 an..70	DE7037 with code INGREDIENT to be used to indicate ingredient information in segment CCI	ingredientName ingredientSequence ingredientContentPerc entage ingredientCatchZone ingredientCountryOfOr iginCode isIngredientHighlighted	

yOfOriginCode (optional) sequenceIngredientEmphasised (AVP)				IngredientName SG37 – CAV DE7110=ISO639 DE1131=3453 DE3055=9 DE7110=Data ingredientSequence SG37 - MEA DE6311=CT DE6313=X40 DE6411=UoM DE6314=Data ContentPercentatge SG37 – MEA DE6311=SV DE6313=X39 DE6411=UoM DE6314=Data fishCatchZone SG37 – CAV DE1131=Y17 DE3055=9 DE7710=Data ingredientCountryOfOriginCode SG37 – CAV DE1131=Y16 DE3055=9 DE7710=Data	

					sequenceOfIngredientEmphasised SG36 – FTX DE4451=Z08 DE4453=1 DE4440= sequenceOfIngredientEmphasised DE4440=Data		
		catchArea (AVP)	AVP	1..40	SG36 – FTX DE4451=Z08 DE4453=1 DE4440= catchArea DE4440=Data	?	**Optional:** Code list www.fao.org/fishery/area/search/en
		catchMethod	AVP	CL	SG36 – FTX DE4451=Z08 DE4453=1 DE4440=catchMethod DE4440=Data	?	**Optional:** Code list ftp://ftp.fao.org/docrep/fao/008/t0367t/t0367t01.pdf
9.1 c	allergens	allergenSpecificationAgency (F&B)	now	an..70	DE7037 with code ALLERGEN to be used to indicate allergen information in segment CCI. SG37 – CAV DE1131=Y06	allergenSpecification.Agency	Wish to default this to 'EU'

				DE3055=9 DE7110=Data		
		allergenSpecific ationName (F&B)	now	an..70	SG37 – CAV DE1131=Y07 DE3055=9 DE7110=Data	allergenSpecification.N ame	Wish to default this to '1169/2011'
		allergenTypeCo de (F&B)	now	an..60	SG37 – CAV DE1131=Y05 DE3055=9 DE7110=Codelist	allergenTypeCode	Codelist containing allergens including the 14 mandatory ones
		levelOfContainm ent (F&B)	now	an..60	SG37 – CAV DE1131=Y05 DE3055=9 DE7110=Codelist	levelOfContainmentCo de	
		allergenStateme nt (F&B)	now	an..10 00	SG36 – FTX DE4451=Z13 DE4453 = 1 DE3453 = ISO639 DE4447=Link DE4440=Data	allergenStatement	For additional remarks on packaging. E.g. Can contain traces of nuts
9.1 e	the net quantity of the food	netContent (core) + unitOfMeasure (core)	now	N/38,1 5	SG36–MEA DE6311=PD DE6313=CT DE6411=UoM DE6314=Data	netContent	Multiple net contents can be declared. Recipients are responsible for interpreting data.

	drained weight	drainedWeight (core) + unitOfMeasure (core)	now	N/38,15	SG36–MEA DE6311=PD DE6313= AEI DE6411=UoM DE6314=Data	drainedWeight	
9.1 g	any special storage conditions and/or conditions of use;	consumerUsage StorageInstructi on (core)	now	an..1000	SG36 – FTX DE4451=HAN DE3453=ISO639 DE4440= consumerUsageS torageInstruction DE4440=Data	consumerUsageInstru ctions consumerStorageInstr uctions	Expresses in text the consumer storage and usage instructions
9.1 h	the name or business name and address of the food business operator referred to in Article 8(1);	contactName (AVP) contactType (core) communicationA ddress (AVP)	new now AVP	new an..35 an..350	SG36 – FTX DE4451=Z08 DE4453=1 DE4440=contact Name DE4440=Data SG36 – FTX DE4451=Z08 DE4453=1 DE4440=commun icationAddress DE4440=Data	partyContactName partyContactRoleCode partyContactAddress	The communication address associated with the contact type as stated on label. AVP requested for communication Address. WR12-315 submitted for contactName. contactName is needed if name for the communicationAddress on the label is different then the name of the Brand Owner, e.g. in the case of an importer.
9.1 i	the country of origin **or** place of provenance where provided for in Article 26	tradeItemCountr yOfOrigin (core)	now	an..70	SG37 – ALI DE3239=ISO 2 Alpha code of the country of origin	countryCode	

placeOfProvenance (AVP)	AVP	an..255	SG36 – FTX DE4451=Z08 DE4453=1 DE4440=placeOf Provenance DE4440=Data	productActivityTypeCode activityRegionDescription		AVP requested
placeOfBirth (AVP)	AVP	an..255	SG36 – FTX DE4451=Z08 DE4453=1 DE4440=placeOf Birth DE4440=Data	productActivityTypeCode activityRegionDescription	AVP requested	
placeOfRearing (AVP)	AVP	an..255	SG36 – FTX DE4451=Z08 DE4453=1 DE4440=placeOf Rearing DE4440=Data	productActivityTypeCode activityRegionDescription	AVP requested	

		placeOfSlaughter (AVP)	AVP	an..255	SG36 – FTX DE4451=Z08 DE4453=1 DE4440=placeOf Slaughter DE4440=Data	productActivityTypeCode activityRegionDescription	AVP requested
9.1 j	instructions for use where it would be difficult to make appropriate use of the food in the absence of such instructions	preparationType (F&B)	now	an..60	SG37-CAV DE1131=Y34 DE3055=9 DE7110=Codelist DE7037 with code FBPREPINFO to be used to indicate preparation information in segment CCI.	preparationTypeCode	Code list containing values like COOKING, BAKING, STEAMING etc. Both preparationType and preparationInstructions must be populated
		preparationInstructions (F&B)	now	an..2500	SG36 – FTX DE4451=AEI DE4441=Preptype codelist DE1131=Y34	preparationInstructions	

					DE3055=9 DE3453=ISO639 DE4447=Link DE4440=Data		
9.1 k	with respect to beverages containing more than 1,2 % by volume of alcohol, the actual alcoholic strength by volume;	percentageOfAlcoholByVolume (core)	now	N/38,15	SG36 – MEA DE6311=AAG DE6411=P1 DE6314=Data	percentageOfAlcoholByVolume	
9.1 l	a nutrition declaration	nutrientTypeCode (F&B)	now	an..35	SG37 – CAV DE1131=Y31 DE3055=9 DE7110=Infoods code DE7037 with code NUTRIENT to be used to indicate nutrient information in segment CCI	nutrientTypeCode	Code from the list of the INFOODS food component tagnames (http://www.fao.org/infoods/tagnames_en.stm) identifying nutrients contained in the product. There is a European list for all possible nutrients, see tab "Nutrient code list Europe".
		measurementPrecision (F&B)	now	an..60	SG37 – MEA DE6311=SV DE6313=X45 DE6321=Data DE7037 with code NUTRIENT to be used to indicate nutrient information in segment CCI	measurementPrecision	Codes: APPROXIMATELY, EXACT or LESS_THAN
		QuantityContained (F&B) +	now	N/15,15	SG37 – MEA	quantityContained	

		UOM nutrientQuantity Contained (F&B)			DE6311=SV DE6313=X45 DE6411=UoM DE6314=Data DE7037 with code NUTRIENT to be used to indicate nutrient information in segment CCI		
		percentageOfDa ilyValueIntake (F&B) MEA+SV+X44+ P1:12'	now	1/5,2	SG37 – MEA DE6311=SV DE6313=X44 DE6411=P1 DE6314=Data DE7037 with code NUTRIENT to be used to indicate nutrient information in segment CCI	dailyValueIntakePerce nt	not needed for energy value
		dailyValueIntake Reference (F&B)	now	an..70	SG37 – CAV DE7111=ISO369 DE1131=3453 DE3055=9 DE7110=Data DE7037 with code FBNUDAYREF to be used to indicate daily value intake reference in segment CCI	dailyValueIntakeRefer ence	

		preparationState (F&B)	now	1/60	SG37 – CAV DE1131=Y30 DE3055=9 DE7110=Codelist (Prepared/unprepared)	preparationStateCode	Has to be populated, choose PREPARED or UNPREPARED
		servingSize (F&B) + UOM serving size (F&B)	now	N/15,15	SG37 – MEA DE6311=SV DE6313=X43 DE6411=UoM DE6314=Data DE7037 with code FBNUINFO to be used to indicate food and beverage nutrient information in segment CCI	servingSize	use for 100gr/100ml, legally required value.
		householdServingSize (F&B)	now	an..70	SG37 – CAV DE7111=ISO369 DE1131=3453 DE3055=9 DE7110=Data DE7037 with code FBNUSERV to be used to indicate serving information in segment CCI.	servingSizeDescription	use to specify serving size

AIII 1.1	additional particulars	compulsoryAdditivesLabelInformation (F&B)	now	an..1000	SG36 – FTX DE4451=Z09 DE3453=ISO639 DE4440=Data		For all other additional info from Annex III and VI of the regulation. Except for 2.1 'with sweetener(s)' this statement shall accompany the name of the food. and 2.2 'with sugar(s) and sweetener(s)' this statement shall accompany the name of the food. These will be part of regulatedProductName.
Optional information:							
Add 1	Number of servings per package	numberOfServingsPerPackage (F&B)	now	N/15	SG36 – MEA DE6311=SV DE6313=X51 DE6411=EA DE6314=Data DE7037 with code SERVINGINFO to be used to specify serving information in segment CCI	numberOfServings	Now Integer, in MR3.0 Float
	Number of servings per package	numberOfServingsRangeDescription (AVP)	AVP	1..75	SG36 – FTX DE4451=Z08 DE4453=1 DE4440= numberOfServingsRangeDescription DE4440=Data	numberOfServingsRangeDescription	
Add 2	Hallmarks	packageMarksDietAllergen (core)	now	VV/60	SG37 – CAV DE1131=X11 DE3055=9 DE7110=Codelist DE7037 with code PACKMARK to be	dietaryClaimCode	Indication of which dietary or allergen marks that are on the package. Check code list still needed.

				used to specify serving information in segment CCI		
packageMarksFreeFrom (core)	now	VV/60	SG37 – CAV DE1131=X14 DE3055=9 DE7110=Codelist DE7037 with code PACKMARK to be used to specify serving information in segment CCI	?	Check code list still needed
packageMarksEthical (core)	now	VV/60	SG37 – CAV DE1131=X13 DE3055=9 DE7110=Codelist DE7037 with code PACKMARK to be used to specify serving information in segment CCI	accreditationCode	Check code list still needed
packageMarksEnvironment (core)	now	VV/60	SG37 – CAV DE1131=X12 DE3055=9 DE7110=Codelist DE7037 with code PACKMARK to be used to specify	accreditationCode	Check code list still needed

					serving information in segment CCI		
Add 3	Claims	healthClaim (F&B)	now	an..70	SG36 – FTX DE 4451=Z14 DE4453=1 DE3453=ISO639 DE4440=Data	healthClaimDescription	For health claims
		nutritionalClaim (F&B)	now	an..1000	SG36 – FTX DE4451=Z10 DE4453=1 DE3453=ISO639 DE4440=Data	nutritionalClaimStatement	For nutritional claims
		tradeItemMarketingMessage (core)	now	an..1000	SG36- FTX DE4451=AGZ DE4453=1 DE3453=ISO639 DE4440=Data	consumerMarketingDescription	For marketing claims
Add 4	Extra text fields	servingSuggestion (F&B)	now	an..1000	SG36 – FTX DE4451=Z11 DE4453=1 DE3452=ISO639 DE4440=Data	servingSuggestion	For serving suggestions
		labelDescription (AVP)	AVP	an..500	SG36 – FTX DE4451=Z08 DE4453=1 DE4440=labelDescription DE4440=Data	productName	A literal reproduction of the text featured on a product's label in the same word-by-word order in which it appears on the front of the product's packaging. AVP requested

Appendix B: Mapping of 1169/2011 Attributes to GTIN Allocation Rules (purely advisory)

Changing the GTIN provides the opportunity for a variant to be easily differentiated from the previous version. This increases the possibility that the correct variant can be made available for picking and, if it is not available at the pick point, the variant can be presented to the consumer who has ordered it on-line as something different from what they ordered so that they can accept or reject it as they choose. Manufacturers should always change the GTIN if in their opinion there is any risk to consumer health arising from confusing variants during the transition from one variant to another. Manufacturers should also allocate a new GTIN if they believe the change in the product would affect the buying decisions of consumers of that product.

This table is purely advisory.

Mandatory Information	1169/2011 ref.	GTIN Allocation Rule	Consumer health implication	Interpretation	Examples
The name of the food	9.1 a, 17, Annex 6	Same GTIN (Rule 2.4)	Low	If the name change reflects a change in the nature of the product a new GTIN should be allocated. Otherwise the GTIN should remain the same	"Lemon Tart" becomes "Lemon and Lime Tart": same GTIN "Spicy noodles" becomes "Hot and Spicy Noodles": same GTIN
A list of the ingredients and the quantity of certain ingredients or categories of ingredients	9.1 b 9.1 d	New GTIN (Rule 4.2.2) or same GTIN (Rule 4.2.1)	Low	Any significant change to ingredients which would change consumers' perception of the product must have a new GTIN. A change to an insignificant ingredient or a change in the order of ingredients would not require a new GTIN	A recipe changes so that the weight of red pepper is greater than that of onion (so that their order in the ingredients list switches): same GTIN. Potassium sorbate is substituted for sodium benzoate: same GTIN.
Allergens (as ingredients or process aids)	9.1.c	New GTIN (Rule 4.2.2)	High	A new GTIN must be allocated when any allergen in Annex II is present when it previously wasn't, or is absent when it was previously present.	"Tofu (**soya**)" is added to the ingredients list: New GTIN
The net quantity of the food	9.1.e	New GTIN (Rule 4.1.3)	None	A new GTIN is needed when a declared net quantity is changed. Almost all foods must declare their	Weight of a yogurt changes from 113gms to 100gms: New GTIN Size changes but declared net

				net content. Changes to undeclared quantities do not require a new GTIN.	quantity does not: Same GTIN.
Any special storage conditions and/or conditions of use	9.1.g	Same GTIN (No specific rule) unless fresh and frozen foods need to be differentiated (Rule 4.2.4)	Low: Consumers usually look at the label on the item (which is the definitive version), not the website, to decide how to store it.	If the change in storage conditions is minor the GTIN should not be changed. However rule 4.2.4 requires different GTINs for fresh and frozen versions of a food. If storage conditions or instructions are changed *significantly* the GTIN could change.	"Eat within 3 days of opening" changes to "Eat within 5 days of opening": Same GTIN. A requirement for refrigeration where there was no such previous requirement (or vice versa): New GTIN. Freezing is required when it wasn't previously (or vice versa): New GTIN.
The name or business name and address of the food business operator referred to in Article 8.1	9.1.h	Same GTIN (Rule 6.2)	None	A change in the name or address of the "Food Business Operator" perhaps following an acquisition or moving the manufacturers head office to a new location should not trigger a new GTIN unless the primary brand name changes.	The name of the food business operator changes from Kraft to Mondelez: same GTIN. The address of the food business operator changes from York YO30 6HQ to York YO31 8TA
The country of origin or place of issuance where provided for in Article 26	9.1.i	Same GTIN (Rule 6.1 or Rule 6.2)	Low	The country of origin should not trigger a change of GTIN	The declaration changes from "Made in England" to "Made in Ireland": same GTIN
Instructions for use where it would be difficult to make appropriate use of the food without such instructions	9.1.j	Same GTIN (No rule)	Low	Changes in usage instructions should not lead to a new GTIN.	"Remove foil and heat under a grill at 200° for 20 minutes" changes to "Remove foil and heat under a grill at 180° for 25 minutes": same GTIN
For beverages containing more than 1,2 % of alcohol by volume , the actual alcoholic strength by volume	9.1.k	New GTIN (Rule 4.2.2) or same GTIN (Rule 4.2.1)	Low. The alcohol content will not vary significantly for a given product	A new GTIN is not necessary if the alcoholic content changes because of seasonal conditions and the product remains the same for the consumer and for the purposes of EU regulation (110/2008).	A wine changes from 11% alcohol to 12% alcohol as a result of vintage variations: Same GTIN

| A nutritional declaration | 9.1.l | Same GTIN (Rule 4.2.1) | Low. Nutritional declarations might have health implications in the long term, but during a transition from one version to another the risk is low | A new GTIN is not necessary for a change in the nutrition declaration. | Salt declaration changes from (per 100g) "0.55g of which sodium 0.22g" to "0.50g of which sodium 0.20g": Same GTIN |