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**FEDIOL Guidance on the labelling requirements
for the ingredient listing of vegetable oils and fats
as per Regulation (EU) 1169/2011:
category name, implications for QUID, hydrogenation**

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Context

Regulation (EU) 1169/2011 establishes the general principles, requirements and responsibilities governing food information, and in particular food labelling.

It aims at providing a basis for final consumers to make informed choices following fair information practices. This means in particular that consumers should not be misled and that information should be accurate, clear and easy to understand for the consumer.

As such, ingredients are to be designated by their specific name where applicable (i.e. by legal name if one exists, or in the absence of a legal name by customary name, or in absence of either, by a descriptive name) (Articles 17 & 18). This means that in principle, the name to be used in an ingredient list should be the same as if the ingredient is sold on its own as a food. The article further refers to technical rules in Annex VII.

The ingredient listing of refined vegetable oils and fats are governed by the provisions in Annex VII.

Labelling refined vegetable oils and fats as ingredients

Refined vegetable oils and fats may either be:

- 1) Grouped together under the category name "*vegetable oils*" or "*vegetable fats*" (followed immediately by a list of indications of specific vegetable origin)
- 2) Listed individually by botanical origin

In addition, following long-standing existing industry practices, they can also be grouped under 3) the class name "*vegetable oils and fats*".

FEDIOL particularly recommends grouping together "*vegetable oils and fats*" for the following reasons:

- 1) It provides accurate, clear and easy information for consumers.
Having the class name "*vegetable oils and fats*" enables consumers to identify the vegetable oil and fat present easily by looking at one ingredient only. It also saves space on the label.
- 2) It avoids consumers confusion
In many cases, several oils and/or fats are present in food products. The same product can be considered as an oil or as a fat depending on the country. For example, palm oil is considered as an oil in The Netherlands, and as a fat in Spain.

Botanical origin disclosure: in varying proportions vs. oils and fats in descending order of weight

According to Annex VII of the Regulation, 2 possibilities are provided for the ingredients listing of vegetable oils and fats:

- a) Listing the individual specific vegetable origins of the vegetable oils and fats in brackets in descending order of weight
- b) Listing the individual specific vegetable origins of the vegetable oils and fats at random, if followed by the phrase "*in varying proportions*"

Example: Bottled vegetable oil containing 60% rapeseed oil, 30% sunflower oil, 10% grapeseed oil

➤ **Ingredient listing options:**

"*Vegetable oils (rapeseed, sunflower, grapeseed)*"

Or

"*Vegetable oils (grapeseed, sunflower, rapeseed, in varying proportions)*"

Botanical origin disclosure: ingredients listing of specific vegetable oils and fats

Regulation 1169/2011 requires the indication of the *specific vegetable origin*. In this context, oils coming from rape seeds or soya beans will be labelled as rapeseed oil or soybean oil.

For other oils, this is less straightforward. For example, "*palm oil*" is extracted from the fruit pulp, while the kernel is used to extract "*palm kernel oil*". The same oil palm tree therefore produces 2 different types of oil with different properties and fatty acid compositions, but with the same botanical origin.

In view of the term "*specific vegetable origin*", FEDIOL believes that listing them separately could confuse consumers and would hence not serve the objectives of clear information as provided for by the Regulation. FEDIOL therefore recommends that oils coming from the palm kernel or from the palm fruit can be both labeled as "*palm*" for the purposes of ingredients listing.

Example: Biscuit with palm oil, palm kernel oil and coconut oil as ingredients

➤ **Recommended listing option:**

"Vegetable oils and fats (palm, coconut)"

Or

"Vegetable oils and fats (palm, coconut, in varying proportions)"

The same interpretation applies also to specific processes pertaining to palm. Indeed, palm is to the utmost majority of cases not applied as straight palm oil, but rather as fractions (palm stearin, palm olein etc.) or as part of a more complex blend of oils. FEDIOL believes that these palm fractions could also be labeled as "*palm*".

On the same note, sunflower seeds for example, can also include high oleic varieties. Following the same interpretation, high oleic sunflower oil can also be labeled as "*sunflower oil*".

Applying the QUID (Quantitative indication of ingredients) according to article 22

If food manufacturers decide not to use a group name for ingredients listing and thus choose to label the individual oils and fats separately, the percentage of these individual oils and fats in the food product are to be given when QUID is required.

The Commission QUID guidance also applies¹.

Hydrogenation

Hydrogenation refers to the process by which unsaturated bonds are saturated with hydrogen.

The current legislation prescribes that oils and fats having been hydrogenated "*fully*" or "*partly*" are to be mentioned on the label.

"*Fully hydrogenated*" means that the hydrogenation was fully performed to the extent possible under practical conditions.

"*Partly hydrogenated*" means that the hydrogenation was not fully performed to the extent possible under practical conditions.

Example: "Vegetable fat (fully hydrogenated sunflower oil)"

A mix of fully hydrogenated and non-hydrogenated oils should never be referred to as "*partly hydrogenated*".

¹ See [here](#) for ease. It is currently under revision by the European Commission.

ANNEX VII of Regulation 1169/2011

INDICATION AND DESIGNATION OF INGREDIENTS

PART A — SPECIFIC PROVISIONS CONCERNING THE INDICATION OF INGREDIENTS BY DESCENDING ORDER OF WEIGHT

<p>8. Refined oils of vegetable origin</p>	<p>May be grouped together in the list of ingredients under the designation "<i>vegetable oils</i>" followed immediately by a list of indications of specific vegetable origin, and may be followed by the phrase "<i>in varying proportions</i>". If grouped together, vegetable oils shall be included in the list of ingredients in accordance with Article 18(1), on the basis of the total weight of the vegetable oils present. The expression "<i>fully hydrogenated</i>" or "<i>partly hydrogenated</i>", as appropriate, must accompany the indication of a hydrogenated oil</p>
<p>9. Refined fats of vegetable origin</p>	<p>May be grouped together in the list of ingredients under the designation "<i>vegetable fats</i>" followed immediately by a list of indications of specific vegetable origin, and may be followed by the phrase "<i>in varying proportions</i>". If grouped together, vegetable fats shall be included in the list of ingredients in accordance with Article 18(1), on the basis of the total weight of the vegetable fats present. The expression "<i>fully hydrogenated</i>" or "<i>partly hydrogenated</i>", as appropriate, must accompany the indication of a hydrogenated fat</p>