



RIGA
GRADUATE
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LAW

ELĪNA STUNGREVIČA

AN ANALYSIS OF THE NUTRITION
AND ALLERGEN LABELLING RULES
IN THE EU AND THEIR IMPLICATIONS
ON THE COMMON MARKET

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Abstract

The EU Regulation 1169/2011 also known as food information to consumers' regulation introduced two advancements - a mandatory nutrition declaration for prepacked food as well as mandatory allergen labelling for prepacked foods plus minimum requirements for allergen representation for non-prepacked foods. The article analysis the interaction between the relevant EU laws and Member State regulations. For this study there were four Member States chosen – Latvia, France, the Netherlands and the UK. Article then looks at the legal evaluation and observes the implications to common market. As the possible consequences are named restriction on free movement of goods and market fragmentation. In addition the purpose of Regulation 1169/2011, which is the protection of consumer health, can be jeopardized. The front of pack labelling systems can disrupt balanced diet of a consumer. Products bearing precautionary labels can actually contain allergen traces yet a consumer will disregard the warnings due to advisory label common occurrence.

Article concludes by determining that the current food labelling area has encountered two issues yet rules in place does not provide for solutions. Thus the further development in the food labelling area, specifically nutrition and allergen labelling, is to be expected.

Key words: food labelling, nutrition declaration, allergens, Regulation (EU) No 1169/2011, food information for consumers, front of pack labelling, precautionary labelling, common market.

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List of abbreviations

CJEU	Court of Justice of European Union
EFSA	European Food Security Authority
EU	European Union
HACCP	Hazard Analysis and Critical Control Points
Member States	EU member states to April 2017 - 28
TFEU	Treaty of Functioning of European Union
UK	The United Kingdom
WHO	World Health Organization
WTO	World Trade Organization

List of definitions

TERM	DEFINITION	EU LEGAL ACT
Compound ingredient	A component that is in itself a final food of more than one ingredient.	Regulation 1169/2011 Article 2 section 2 part (h).
Food	Any ingredient or product at any procession stage anticipated to be or rationally expected to be consumed by humans. It also includes drinks, water and any ingredients deliberately included into the food during its manufacturing; stated in the	Regulation 178/2002 Article 2 and the Regulation 1924/2006 Article 2 section 1 part (a). Regulation 1169/2011 upholds this definition as well through its Article 2 section 1 part (a).
Food information	Essential information about food that is made available to final consumer through label, attached sign or through other tools, including modern technology or verbal interaction.	Regulation 1169/2011 Article 2 section 2 part (a).
Ingredient	Any substance used in preparation of food and still present in the final product including a compound ingredient.	Regulation 1169/2011 Article 2 section 2 part (f).
Label	Any card, sign, graphic or other explanatory matter attached or printed on the packaging of the food.	Regulation 1169/2011 Article 2 section 2 part (i).
Labelling	Any word or symbol related to food and positioned on any packaging and label referring to the particular food.	Directive 79/112/EEC in its Article 1 part 3. Directive 2000/13/EC Article 1 section 3 part (a). Regulation 1924/2006 Article 2 section 1 part (d). Regulation 1169/2011 Article 2 section 2 part (j).
Mandatory food information	Essentials that are compulsory to be delivered for final consumer by the EU legal acts. The Regulation 1169/2011 in Article 9 section 1 lists nine mandatory elements that should be provided on the food label. They are – name, list of ingredients, any component causing allergies or intolerances as listed in Annex II of the Regulation used in the manufacturing of food and still present even if in altered form in the final food product, quantity and groups of ingredients, net quantity, use by date, special storage conditions, name and address of business operator, country of origin if applicable, instructions of use if applicable,	Regulation 1169/2011 Article 2 section 2 part (c).

	actual alcoholic beverage strength if applicable, nutrition statement.	
Nutrient	Protein, carbohydrate, fat, fibre, sodium and vitamins and minerals as well as ingredients that go into or are parts of one of those groups.	Directive 90/496/EEC. Regulation 1924/2006 Article 2 section 2 part 2. Regulation 1169/2011 Article 2 section 2 part (s).
Nutrition claim	Any information presented on the food indicating the particular nutrition value of the food due to calorific value food offer, offer at lower or higher rate or does not offer as well as nutrition food includes, includes at lower or higher proportions or excludes.	Directive 90/496/EEC Article 4 section 4 part (b). Regulation 1924/2006 Article 2 section 2 part 4.
Nutrition labelling	Information presented on the food related to energy value and such nutrition's as protein, carbohydrate, fat, fibre, sodium and vitamins and minerals listed in the directive.	Directive 90/496/EEC Article 4 section 4 part (a).
	Also called as nutrition declaration - energy value and/or one or more of such nutrition's as fat, carbohydrate, salt, fibre, protein and any vitamins and minerals listed in the Annex XIII if present in prescribed amounts.	Regulation 1169/2011 Article 2 section 4 in Annex I
Prepacked	An item that is composed of a food product and a package into which the product was put before the sale and representation to the consumer. The package should be such that it is not possible to reach the food unless the package is opened. The Regulation 1169/2011 additionally clarifies that this definition does not cover food that is packed by the buyer's request at the sales sites.	Directive 79/112/EEC. Directive 2000/13/EC Article 1 section 3 part (b). Regulation 1169/2011 in its Article 2 section 2 part (e).
Primary ingredient	One or more components that characterize more than half of the final food product or which are generally linked with the name of the food by the buyers as well as for which most likely a portion is needed.	Regulation 1169/2011 Article 2 section 2 part (q).
Traceability	Capacity to trace an ingredient anticipated to be included in the final food through all the phases of food manufacturing, processing and distribution.	Regulation 178/2002 Article 3 section 15.

INTRODUCTION

Various emerging health issues have influenced contemporary food labelling area in the European Union (further in the text – EU). High obesity rates among adult and child Europeans have been reported already for several years.^{1 2} Obesity can lead to further health issues and reduce the level of life. The particular upward trend is threatening and has led the World Health Organization (further in the text - WHO) and the EU law-making bodies to issue rules to tackle the problem. In the recent decades the level of allergic people has been gradually growing. Allergies and food intolerances impact person's life and in certain cases might even lead to death if certain precautions are not taken.³ This has become the issue of public safety.

Public health issues that are related to European safety are a shared competence between EU and its Member States in virtue of Article 4 of the Treaty on the Functioning of the EU (further in the text - TFEU)⁴. The EU has challenged the obesity and allergies by implementing various legal acts over the past decades. One of the tackled areas is food labelling. Through the food labels the manufacturers can pass on information about the food to the consumers. In 2011 the new regulation was put in place that adjusted food information to the consumer. It was Regulation 1169/2011⁵ or also known as food information to consumers' regulation. It also for the first time made mandatory allergen labelling for prepacked foods and set minimal requirements for allergen information of non-prepacked food in the EU Member States as well as made nutrition labels a part of the mandatory food information on the label. The aim of the regulation is to protect consumers' health and maintain free

¹ Eurostat news release. European Health Interview Survey. Between 8% and 25% of adults are obese across Member States. No systematic differences between women and men. 172/2011. 24 November, 2011. Available on: <http://ec.europa.eu/eurostat/documents/2995521/5032782/3-24112011-BP-EN.PDF/831f0ca4-7105-4045-9e25-604141ef5108>. Accessed October 19, 2018.

² Eurostat newsrelease. European Health Interview Survey. Almost 1 adult in 6 in the EU is considered obese. Share of obesity increases with age and decreases with education level. 203/2016. 20 October, 2016. Available on: <http://ec.europa.eu/eurostat/documents/2995521/7700898/3-20102016-BP-EN.pdf/c26b037b-d5f3-4c05-89c1-00bf0b98d646>. Accessed October 19, 2018.

³ EAACI: 17 million Europeans allergic to food; allergies in children doubled in the last 10 years, Press release, 17 February 2011. Available on: http://www.eaaci.org/images/files/Pdf_MsWord/2011/Press_Release/17%20million%20Europeans%20allergic%20to%20food;%20allergies%20in%20children%20doubled%20in%20the%20last%2010%20years.pdf. Accessed October 19, 2018.

⁴ Consolidated version of the Treaty on the Functioning of the European Union, OJ C 326, 26.10.2012, pp. 47–390. Available on: <http://eur-lex.europa.eu/legal-content/en/TXT/?uri=CELEX:12012E/TXT>. Accessed October 19, 2018.

⁵ Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004 Text with EEA relevance, *OJ L* 304, 22.11.2011, pp. 18–63. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32011R1169>. Accessed October 19, 2018.

movement of goods in the common market. In order to achieve it harmonization of food labelling rules was implemented yet it also left a room of freedom for the Member States on certain aspects of implementation. Now, five years after the regulation was put in place, there could be seen issues in regard to current situations legal framework that Regulation 1169/2011⁶ introduced specifically in nutrition and allergen labelling area.

Some Member States have put in place various forms of front of pack nutrition labels to make them more understandable for the consumer. One of the most discussed systems is the traffic light label classification present in the United Kingdom (further in the text - UK). However, it has been argued that the method is actually impeding free movement of goods and in itself not actually helping consumers to make healthier choices. Front of pack labels are classified as additional forms of expression under the food information to consumers regulation; they are free to be regulated by the EU Member States.

Since the allergen presentation of the products is mandatory, it has led to an alternative development of precautionary or advisory allergen labels that has already been highlighted as another problem. The aim of mandatory allergen representation is to protect allergic consumers by informing of the food ingredients. The parallel trend of the manufacturers to place advisory allergen labels, however, might go against such protection of consumers' health. It has been studied that market overburdening of precautionary labels has led to a situation where allergic consumers tend to ignore such labels.⁷ Placement of advisory labels is regulated neither at the EU level nor in the EU Member States. Initiatives and guidelines come from manufacturers, producers and retailers themselves. These developments are putting up a possible risk of fragmentation of free movement of goods as well as endangering consumers' health.

Thus the topic of this research "An Analysis of the Nutrition and Allergen Labelling Rules in the EU and their Implications on the Common Market" is designed to tackle the two current and highlighted issues and provide their implications to the common market, hence providing an argumentation to answer the research statement that further harmonization in food labelling area is most likely inevitable.

A qualitative methodology will be used in the article with a focus on rules in the EU system and their case analysis. This methodology was chosen with an aim to study the particular food labelling rules in the EU in the area of nutrition declarations and allergen labelling and also understand the reasoning of adopting such rules in the EU to further analyse their possible development and implications to the common market. In the research will be used several methods such as doctrinal, empirical and comparative. Doctrinal method, which is the study of law, is used to understand the current legal framework of food labelling area in the EU. Empirical method, which is a study of understanding how legal rules works in real life, is used to observe how

⁶ *Ibid.*

⁷ K.J. Allen, Turner P.J., Pawankar R., Taylor S., Sicherer S., Lack G., Rosario N., Ebisawa M., Wong G., Clare Mills E.N., Beyer K., Fiocchi A., Sampson H.A. "Precautionary labelling of foods for allergen content: are we ready for a global framework?" *World Allergy Organization Journal* April 2014, Vol. 7, Issue 1, Article No 10, DOI: 10.1186/1939-4551-7-10.

the current legal framework of food labelling in the EU fits into the practise of the EU Member States and what issues come on surfaces. Comparative method, which is a method used to compare the implementation of Regulation 1169/2011⁸ in different states, is necessary for the observation of food labelling rules in four EU Member States chosen for this particular study.

The article consists of four parts. The first part is titled evolution of food labelling rules in the EU and studies the development of the food labelling area under the EU legal institutions. The chapter provides for reasoning and understanding of the actions taken by the EU law making bodies in the field of food labelling. The second part is titled legal framework of the research and it provides for establishment of background of this study. It focuses on the two highlighted contemporary issues of food labelling area – a nutrition declaration and allergen labelling. It is further divided into two subchapters named nutrition declaration and allergens. Nutrition declaration subchapter focuses on various fronts of pack nutrition labelling systems as well as the newest development in this field across the Europe. Whereas allergen sub-chapter focuses on allergen labelling and traceability issues that has caused increased usage of precautionary allergen labels and downside implications to allergic consumers. The third part is titled interaction between national and EU law. This chapter analysis the legal rules in place for the established framework of this study – nutrition and allergen labels. Additionally, the chapter also outlines the basis of practical study that will be carried out for four chosen Member States – Latvia, the Netherlands, the UK and France. It is further divided into five subchapters. The first subchapter deals with the relevant EU law in place for allergen and front of pack nutrition declaration framework. The second subchapter analysis the law in place of the two specified issues in Latvia as well as observes the practical examples. The third subchapter focuses on the rules that are laid down and also real life practise of allergen labelling and nutrition declarations in the Netherlands. The fourth subchapter emphasizes the law and practise of allergen labelling and front of pack nutrition labels in the UK. The fifth subchapter deals with the France and the relevant laws and practise of front of pack nutrition labels and allergen labelling. The fourth and final part is titled legal evaluation and the implications on the common market. It analysis the present front of pack labelling system against criteria that should be fulfilled in order for the system to be in line with law. It also examines the current precautionary allergen label practise and its implications.

Literature used in the research will cover preliminary sources such as EU treaties, regulations and directives and the internal laws of France, Latvia, the Netherlands and the UK as well as the case law of the Court of Justice of the European Union (further in the text - CJEU). Secondary academic sources used will be various EU and international organizations official papers and journal articles. Non-academic sources will also include websites. Since the area of food labelling has gone through some various changes in the recent years and is rather an undiscovered field there are not many books available.

⁸ *Supra* note 5.

1. EVOLUTION OF FOOD LABELLING RULES IN THE EU

Law requirements of food labelling that are prescribed in on the latest's EU food law instruments Regulation 1169/2011⁹ have come a long way from the first EU legal instruments in the food law field. How it happened and why the evolution of food labelling rules was needed will be explained in the following section.

The ground of common market was established by Treaty of Rome¹⁰ in 1957 and it is also known as European Economic Community. Treaty of Rome in its part two about foundations of the community under title I states free movement of goods as one of four cornerstones of the common market. Free movement of goods has been the basis for progress of food law in the EU. Now the freedom is embodied in TFEU part three title two¹¹. At the beginning the emphasis was put on the vertical legislation – product specific that ensured quality standards. Yet the CJEU case law changed the course.

Judgment in *Rewe-Zentral AG v Bundesmonopolverwaltung für Branntwein* also known as *Cassis de Dijon*¹² case in 1979 by CJEU is one of the landmark decisions in the field of free movements of goods. Reasoning was based on the principle of mutual recognition. The main idea behind the judgment is that prohibition to import product that has been lawfully produced and marketed in one member state because it does not comply with national rules of importing member state is a measure having equivalent effect to quantitative restriction on trade and it is prohibited. Moreover prohibition applies to all national measures which relates to both domestic and imported goods, yet in reality puts more weight on imported goods due to fact that they have to comply with manufacturing and importing state laws. Now the rule is also laid down in the Article 34 of TFEU¹³. This marked the shift of EU legislation towards horizontal legislation that focused on common rules of the field altogether.

Regarding the interpretation of “measures having an equivalent effect” CJEU issued a judgment in *Procureur du Roi v Benoît and Gustave Dassonville*¹⁴ case in 1974. The court stated that all trading laws that are authorized by the EU Member States and that are efficient to hinder directly or indirectly, essentially or theoretically common market and thus its trade are to be categorized as measure having an equivalent effect to quantitative restriction.

⁹ *Supra* note 5.

¹⁰ Treaty establishing the European Economic Community (The Treaty of Rome), 25 March 1957, Available on: http://ec.europa.eu/archives/emu_history/documents/treaties/rometreaty2.pdf. Accessed October 19, 2018.

¹¹ *Supra* note 4.

¹² Judgment in *Rewe-Zentral AG v Bundesmonopolverwaltung für Branntwein*, 20 February 1979, C-120/78, ECLI:EU:C:1979:42, para. 15.

¹³ *Supra* note 11.

¹⁴ Judgment in *Procureur du Roi v Benoît and Gustave Dassonville*, 11 July 1974, C-8/74, ECLI:EU:C:1974:82, para. 5

In 1978 the Directive 79/112/EEC¹⁵ came into effect that recognized the rules of food labelling, representation and advertising. The Directive has been amended various times by the following directives – Directive 85/7/EEC¹⁶ changed the referral time to the committee, Directive 86/197/EEC¹⁷ amended the alcohol labelling rules, Directive 89/395/EEC¹⁸ amended the Directive 79/112/EEC¹⁹ to also be applicable to the mass caterers such as restaurants, Directive 91/72/EEC²⁰ added rules for designation of lists of flavouring, Directive 93/102/EEC²¹ replaced the annexes of the Directive 79/112/EEC²², Directive 97/4/EC²³ amended the rules of the name of food and finally Directive 1999/10/EC²⁴ provided for derogations of Article 7 of Directive 79/112/EC²⁵.

¹⁵ Council Directive 79/112/EEC of 18 December 1978 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs for sale to the ultimate consumer, *OJ L* 33, 8.2.1979, pp. 1–14. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:31979L0112>. Accessed October 19, 2018.

¹⁶ Council Directive 85/7/EEC of 19 December 1984 amending a first series of Directives on the approximation of the laws of the Member States in the foodstuffs sector, as regards the involvement of the Standing Committee for Foodstuffs, *OJ L* 2, 3.1.1985, pp. 22–23. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31985L0007>. Accessed October 19, 2018.

¹⁷ Council Directive 86/197/EEC of 26 May 1986 amending Directive 79/112/EEC on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs for sale to the ultimate consumer, *OJ L* 144, 29.5.1986, pp. 38–39. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31986L0197>. Accessed October 19, 2018.

¹⁸ Council Directive 89/395/EEC of 14 June 1989 amending Directive 79/112/EEC on the approximation of the laws of the Member States relating to labelling, presentation and advertising of foodstuffs for sale to the ultimate consumer, *OJ L* 186, 30.6.1989, pp. 17–20. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31989L0395>. Accessed October 19, 2018.

¹⁹ *Supra* note 15.

²⁰ Commission Directive 91/72/EEC of 16 January 1991 amending Council Directive 79/112/EEC in respect of the designation of flavourings in the list of ingredients on the labels of foodstuffs, *OJ L* 42, 15.2.1991, pp. 27–28. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31991L0072>. Accessed October 19, 2018.

²¹ Commission Directive 93/102/EC of 16 November 1993 amending Directive 79/112/EEC on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs for sale to the ultimate consumer, *OJ L* 291, 25.11.1993, pp. 14–16. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31993L0102>. Accessed October 19, 2018.

²² *Supra* note 15.

²³ Directive 97/4/EC of the European Parliament and of the Council of 27 January 1997 amending Directive 79/112/EEC on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs *OJ L* 43, 14.2.1997, pp. 21–23. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31997L0004>. Accessed October 19, 2018.

²⁴ Commission Directive 1999/10/EC of 8 March 1999 providing for derogations from the provisions of Article 7 of Council Directive 79/112/EEC as regards the labelling of foodstuffs (Text with EEA relevance), *OJ L* 69, 16.3.1999, pp. 22–23. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:31999L0010>. Accessed October 19, 2018.

²⁵ *Supra* note 15.

In 1990 into effect came Directive 90/496/EEC²⁶ that regulated the rules on nutrition labelling for food.

In 1995 the EU became a member of World Trade Organization (further in the text - WTO). Each of the EU Member States is also a member on their own, yet the EU represents their rights in the WTO.²⁷ WTO in itself is an organization that functions as a forum for trade agreement negotiations between nations as well as a trade dispute settlement body. In its purposes it also sets the trade rules.²⁸ The rules and agreements adopted by the WTO later on leaves an influence also to the legal acts of the EU.

In 1997 the Commission published Green Paper on "The general principles of food law in the European Union"²⁹. It put forward the main goals of the EU food law. The paper also discussed the possibility to consolidate the amendments made to the Directive of 1978³⁰. Among other things the Commission noted the recent concern that also allergen information should be provided in the label. The level discussed included even the traces of known allergens. The paper also noted the recently raised issue of health claims made on the labels. Since many of claims asked for scientific evidence it was a burden placed on verification authorities to confirm it. Nutrition labelling was also reviewed and possibility to make it mandatory was also considered.³¹ The author observes that already in 1997 the traceability issue of allergens was discussed as an existing problem.

In 2000 into effect came the Directive 2000/13/EC³² that consolidated all the previous amendments to the Directive 79/112/EEC³³ about the labelling, representation and advertisement of food. Nonetheless, over the course of years it was also repeatedly amended by various directives – Directive 2001/101/EC³⁴ revised

²⁶ Council Directive 90/496/EEC of 24 September 1990 on nutrition labelling for foodstuffs, *OJ L* 276, 6.10.1990, pp. 40–44. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:31990L0496>. Accessed October 19, 2018.

²⁷ World Trade Organization, The European Union. Available on: https://www.wto.org/english/thewto_e/countries_e/european_communities_e.htm. Accessed October 19, 2018.

²⁸ World Trade Organization, Who we are. Available on: https://www.wto.org/english/thewto_e/whatis_e/who_we_are_e.htm. Accessed October 19, 2018.

²⁹ Commission of the European Communities. THE GENERAL PRINCIPLES OF FOOD LAW IN THE EUROPEAN UNION, Commission Green Paper Brussels, 30.04.1997 COM (97) 176 final. Available on: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:1997:0176:FIN:EN:PDF>. Accessed October 19, 2018.

³⁰ *Supra* note 15.

³¹ *Supra* note 29.

³² Directive 2000/13/EC of the European Parliament and of the Council of 20 March 2000 on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs, *OJ L* 109, 6.5.2000, pp. 29–42. Available on: <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32000L0013>. Accessed October 19, 2018.

³³ *Supra* note 15.

³⁴ Commission Directive 2001/101/EC of 26 November 2001 amending Directive 2000/13/EC of the European Parliament and of the Council on the approximation of the laws of the Member States relating to the labelling, presentation and advertising of foodstuffs, *OJ L* 310,

the rules for definition of meat, Directive 2002/67/EC³⁵ modified the labelling rules as regard caffeine and quinine, Directive 2003/89/EC³⁶ adjusted the rules for indication of ingredients in the food especially the allergens, Directive 2006/142/EC³⁷ improved the rules of labelling by list of ingredients that must be presented in the label, finally Directive 2007/68/EC³⁸ amended Annex IIIa of the Directive 2000/13/EC³⁹ that was modified by Directive 2005/26/EC⁴⁰, which added allergen labelling requirements. Further additions were already made through regulations discussed below.

In 2000 the Commission published its White paper on "Food safety"⁴¹. The paper among other adjustments also proposed binding labelling rules to ensure that consumer can make fully informed choices of the food; they included allergen information and nutritional knowledge⁴². After the publication of the White paper soon followed various regulations in the EU food law.

Regulation 178/2002⁴³ laid down the general principles and requirements of food law. Article 16 of the Regulation addressed food labelling stating that labelling of the product should not be misleading. Furthermore, the Regulation established the

28.11.2001, pp. 19–21. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32001L0101>. Accessed October 19, 2018.

³⁵ Commission Directive 2002/67/EC of 18 July 2002 on the labelling of foodstuffs containing quinine, and of foodstuffs containing caffeine (Text with EEA relevance), *OJ L* 191, 19.7.2002, pp. 20–21. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32002L0067>. Accessed October 19, 2018.

³⁶ Directive 2003/89/EC of the European Parliament and of the Council of 10 November 2003 amending Directive 2000/13/EC as regards indication of the ingredients present in foodstuffs (Text with EEA relevance) *OJ L* 308, 25.11.2003, pp. 15–18. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32003L0089>. Accessed October 19, 2018.

³⁷ Commission Directive 2006/142/EC of 22 December 2006 amending Annex IIIa of Directive 2000/13/EC of the European Parliament and of the Council listing the ingredients which must under all circumstances appear on the labelling of foodstuffs (Text with EEA relevance), *OJ L* 368, 23.12.2006, pp. 110–111. Available on: <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32006L0142>. Accessed October 19, 2018.

³⁸ Commission Directive 2007/68/EC of 27 November 2007 amending Annex IIIa to Directive 2000/13/EC of the European Parliament and of the Council as regards certain food ingredients (Text with EEA relevance), *OJ L* 310, 28.11.2007, pp. 11–14. Available on: http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32007L0068#ntr2-L_2007310EN.01001101-E0002. Accessed October 19, 2018.

³⁹ *Supra* note 32.

⁴⁰ Commission Directive 2005/26/EC of 21 March 2005 establishing a list of food ingredients or substances provisionally excluded from Annex IIIa of Directive 2000/13/EC of the European Parliament and of the Council Text with EEA relevance, *OJ L* 75, 22.3.2005, pp. 33–34. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32005L0026>. Accessed October 19, 2018.

⁴¹ Commission of the European Communities. White Paper on Food Safety. Brussels, 12 January 2000, COM (1999) 719 final. Available on: http://ec.europa.eu/dgs/health_food-safety/library/pub/pub06_en.pdf. Accessed October 19, 2018.

⁴² *Ibid.*

⁴³ Regulation (EC) No 178/2002 of the European Parliament and of the Council of 28 January 2002 laying down the general principles and requirements of food law, establishing the European Food Safety Authority and laying down procedures in matters of food safety, *OJ L* 31, 1.2.2002, pp. 1–24. Available on: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2002:031:0001:0024:en:PDF>. Accessed October 19, 2018.

European Food Safety Authority (further in the text – EFSA), an organisation that provides scientific guidance and statements on dangers linked to food chain.⁴⁴ Regulation 1829/2003⁴⁵ sets the rules of labelling for genetically modified food. Regulation 1830/2003⁴⁶ addressed labelling issues of genetically modified organisms and their traceability. Regulation 853/2004⁴⁷ addressed the hygiene rules for foodstuff including its labelling. Regulation 882/2004⁴⁸ adopted the rules regarding the official controls of compliance checks including the food labelling. Regulation 1924/2006⁴⁹ is the main legislative act in a field of nutrition and health claims. The underlying principle is that any claim made about the food and presented in the labelling is grounded on scientific evidence as well as is clear and correct. Regulation 1332/2008⁵⁰ covered the labelling requirements for food enzymes. Regulation 1333/2008⁵¹ enclosed the labelling necessities for food additives. Regulation 1334/2008⁵² provided the labelling rules for food flavourings.

⁴⁴ EFSA. About EFSA. Available on: <https://www.efsa.europa.eu/en/aboutefsa>. Accessed October 19, 2018.

⁴⁵ Regulation (EC) No 1829/2003 of the European Parliament and of the Council of 22 September 2003 on genetically modified food and feed (Text with EEA relevance), *OJ L* 268, 18.10.2003, pp. 1–23. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX%3A32003R1829>. Accessed October 19, 2018.

⁴⁶ Regulation (EC) No 1830/2003 of the European Parliament and of the Council of 22 September 2003 concerning the traceability and labelling of genetically modified organisms and the traceability of food and feed products produced from genetically modified organisms and amending Directive 2001/18/EC, *OJ L* 268, 18.10.2003, pp. 24–28. Available on: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2003:268:0024:0028:EN:PDF>. Accessed October 19, 2018.

⁴⁷ Corrigendum to Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin (*OJ L* 139, 30.4.2004), *OJ L* 226, 25.6.2004, pp. 22–82. Available on: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:139:0055:0205:en:PDF>. Accessed October 19, 2018.

⁴⁸ Corrigendum to Regulation (EC) No 882/2004 of the European Parliament and of the Council of 29 April 2004 on official controls performed to ensure the verification of compliance with feed and food law, animal health and animal welfare rules (*OJ L* 165, 30.4.2004), *OJ L* 191, 28.5.2004, pp. 1–52. Available on: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2004:165:0001:0141:EN:PDF>. Accessed October 19, 2018.

⁴⁹ Regulation (EC) No 1924/2006 of the European Parliament and of the Council of 20 December 2006 on nutrition and health claims made on foods, *OJ L* 404, 30.12.2006, pp. 9–25. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32006R1924>. Accessed October 19, 2018.

⁵⁰ Regulation (EC) No 1332/2008 of the European Parliament and of the Council of 16 December 2008 on food enzymes and amending Council Directive 83/417/EEC, Council Regulation (EC) No 1493/1999, Directive 2000/13/EC, Council Directive 2001/112/EC and Regulation (EC) No 258/97 (Text with EEA relevance), *OJ L* 354, 31.12.2008, pp. 7–15. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32008R1332>. Accessed October 19, 2018.

⁵¹ Regulation (EC) No 1333/2008 of the European Parliament and of the Council of 16 December 2008 on food additives (Text with EEA relevance), *OJ L* 354, 31.12.2008, pp. 16–33. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32008R1333>. Accessed October 19, 2018.

⁵² Regulation (EC) No 1334/2008 of the European Parliament and of the Council of 16 December 2008 on flavourings and certain food ingredients with flavouring properties for use

Codex Alimentarius is an international collection of standards, guides and codes approved by the Codex Alimentarius Commission. The collection serves as a protection of consumers' health and insurance of fair trade in food business.⁵³ In 2003 the EU joined the Codex Alimentarius Commission by Decision 2003/822/EC⁵⁴, which is an international body that fosters and approves food standards that acts as standards for international food trade. There are various committees in the body. There are committees on general subjects such as general principles, food labelling, food hygiene and food additives, then there are commodity committees on such subjects as milk and milk products, cereals, pulses and legumes and on sugar, also there are coordinating committees for various world regions.⁵⁵ The law developments of this body have also at some extent been an influence on the food law development of the EU.

Furthermore, in 2004 WHO published its regional series book about the Europe in field of food and health. The publication outlined the health issues that might follow in case of poor nutrition, no information on allergens in the foods and lack of healthy lifestyle such as various diseases and even death. It emphasized the vital need for health and nutrition policies in the Europe.⁵⁶ This report was one of the starting points for various changes in the food-labelling field.

In 2005 the Commission published its Green paper on "Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases"⁵⁷. It signified the consumer information as one of the area of action. The emphasis was put on the fact that with clear information about the food together with appropriate consumer education the necessary foundation of the informed consumer choice can be made. Afterwards Commission also submitted a proposal for regulation on nutrition and health claims.⁵⁸ The author notes that it is

in and on foods and amending Council Regulation (EEC) No 1601/91, Regulations (EC) No 2232/96 and (EC) No 110/2008 and Directive 2000/13/EC (Text with EEA relevance), *OJ L* 354, 31.12.2008, pp. 34–50. Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32008R1334>. Accessed October 19, 2018.

⁵³Codex Alimentarius. International Food Standards. Available on: <http://www.fao.org/fao-who-codexalimentarius/en/>. Accessed October 19, 2018.

⁵⁴ 2003/822/EC: Council Decision of 17 November 2003 on the accession of the European Community to the Codex Alimentarius Commission, *OJ L* 309, 26.11.2003, pp. 14–21. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:32003D0822>. Accessed October 19, 2018.

⁵⁵Codex Alimentarius. International Food Standards. Committees and task forces. Available on: <http://www.fao.org/fao-who-codexalimentarius/committees/en/>. Accessed October 19, 2018.

⁵⁶ Robertson, Tirado, Lobstein, Jermini, Knai, Jensen Ferro-Luzzi and James. Food and Health in Europe: a new basis for action. 2004. WHO regional publications. European series, No. 96. 388 pages. Available on: http://www.euro.who.int/__data/assets/pdf_file/0005/74417/E82161.pdf?ua=1. Accessed October 19, 2018.

⁵⁷ Commission of the European Communities. Green Paper on Promoting healthy diets and physical activity: a European dimension for the prevention of overweight, obesity and chronic diseases, Brussels, 08.12.2005, COM (2005) 637 final. Available on: http://ec.europa.eu/health/ph_determinants/life_style/nutrition/documents/nutrition_gp_en.pdf. Accessed October 19, 2018.

⁵⁸ *Ibid.*

emphasized that only together with relevant consumer education the nutrition information will help for the dietary choice of consumer.

In 2007 the Commission published White Paper on "A strategy for Europe on nutrition, overweight and obesity related health issues"⁵⁹. It highlighted the review of EU legislation of nutrition labelling as well as the possible mandatory labelling again. The paper also emphasized the importance of nutrition labelling as a way to help consumers make informed choices about their food. It has been expressed that the informed choice concept for the food labelling area is meant to encourage the consumer to make a knowledgeable selection and choose the food product that fits his diet the most appropriately.⁶⁰ Consumer information was identified as a policy priority area in order to stop overweight and obesity in the EU by addressing nutrition and physical activity. The notion of "informed consumer" was also described in this paper. It is understood that the consumer makes choices based on the knowledge gained by the environment around him. Thus the decisions are influenced by the information based on proof and also advertisements. It has led the Commission to examine the nutrition labelling and front of pack labelling rules in the EU since they work as an advertisement as well as observe the rules of health claims that the manufacturers state about their products to ensure that they are based on scientific proof.⁶¹ From the developed strategy for the EU it can be concluded that major changes will follow in food labelling as well.

In 2008 the Commission put forward a proposal for a regulation on requirements of food information to consumers⁶². In 2011 the Regulation 1169/2011⁶³ was published. It provided for various changes in food labelling area. For allergen representation it meant more clear structure of representation in prepacked foods as well as mandatory specification of allergens for non-prepacked foods involving representation in mass caterer places such as cafes and restaurants. Specific nutrition information labelling was made mandatory for prepacked and processed foods. For all the mandatory information that needs to be presented was enhanced legibility. Food labelling requirements were made also applicable to distance selling. Rules for prohibiting deceiving practices were improved. Additional amendments included mandatory origin labelling for fresh meat, ingredient list updates by engineered nanomaterial's, rules on vegetable origin of oils, warnings for imitation foods, formed fish or meat as well as defrosted products. New Regulation was set to come into effect on 1 January 2014; with the exception for part on

⁵⁹ Commission of the European Communities. White paper on A Strategy for Europe on Nutrition, Overweight and Obesity related health issues, Brussels, 30.05.2007, COM (2007) 279 final. Available on: http://ec.europa.eu/health/archive/ph_determinants/life_style/nutrition/documents/nutrition_wp_en.pdf. Accessed October 19, 2018.

⁶⁰ Lorenzo Cuocolo, "The Questionable Eligibility of Traffic Light Labelling," *European Food & Feed Law Review*, 2014, Vol. 9 Issue 6, pp. 382-390.

⁶¹ *Supra* note 59.

⁶² Commission of the European Communities, Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on the provision of food information to consumers, Brussels, 30.1.2008 COM (2008) 40 final 2008/0028 (COD). Available on: <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:52008PC0040>. Accessed October 19, 2018.

⁶³ *Supra* note 5.

nutrition labelling that should come into effect starting on 13 December 2016. The Regulation has been amended by several delegated acts of the Commission already one of them being about certain cereals causing allergies or intolerances adopted on 22 November 2013⁶⁴. Delegated acts procedure for the Commission has been embodied in the Article 51 of the Regulation; this procedure allows keeping the legal act up to the latest developments in the field.

Ultimately, the main legislative acts for food labelling were Directive 2000/13/EC⁶⁵ and Directive 90/496/EEC⁶⁶. Both of the legislative documents were composed into Regulation 1169/2011⁶⁷ that now is the main legal document in the field of food information for consumers. The outline of the food labelling rules can be also seen in the annex No 1.

The Commission has outlined the problem of overweight and corpulence among the EU population in its White paper on "A strategy for Europe on nutrition, overweight and obesity related health issues"⁶⁸. In the recent years various studies also show increase in the population with allergies or intolerances.⁶⁹ Over the period of time the EU has tried to keep up with the latest health issues of the population by issuing various amendments to the main directives in the fields as also showed by the overview above. However that led to the fragmentation of the EU requirements in the food law field. It did not help to increase the legal certainty for neither the consumers nor food manufacturers. Therefore, in the author's opinion combining various legal acts that each embodied different advancements in the field of food law and food labelling was a necessity.

⁶⁴ Commission Delegated Regulation (EU) No 78/2014 of 22 November 2013 amending Annexes II and III to Regulation (EU) No 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers, as regards certain cereals causing allergies or intolerances and foods with added phytosterols, phytosterol esters, phytostanols or phytostanol esters, *OJ L 27*, 30.1.2014, pp. 7–8. Available on: <http://eur-lex.europa.eu/legal-content/EN/ALL/?uri=CELEX:32014R0078&qid=1490938708840>. Accessed October 19, 2018.

⁶⁵ *Supra* note 32.

⁶⁶ *Supra* note 26.

⁶⁷ *Supra* note 5.

⁶⁸ *Supra* note 59.

⁶⁹ M. J. Hendriks, Frewer L. J., van der Meulen B. M. J., "Allergens in Law: European Legislation Assessed against the Preferences of Food Allergic Consumers." *European Food & Feed Law Review*, 2011, Vol. 6, Issue 2, pp. 74 – 87.

2. LEGAL FRAMEWORK OF THE RESEARCH

Regulation 1169/2011⁷⁰ introduced various amendments as mentioned above to food labelling area of the EU. The aims of the Regulation 1169/2011⁷¹ are stated in its Article 3. It emphasizes the necessity of food information to provide protection of consumers' health and interests allowing them to make informed choices. It also highlights free movement of foods in the common market of the EU. Article 4 speaks about the principles of mandatory food information law. There are three main principles underlying obligatory food information law. First, it is information about the identity of the food such as its characteristics, possessions and content. Second, it is information of the product to protect the health of the consumer and would enable the safe use of the food such as durability date and storage necessities, for example. Third, it is nutrition features of the product that will allow the consumer to make informed food choices. Another important notion that has been expressed is that the majority of the consumers attribute certain significance for particular information of the food and it should be respected when deliberating the necessity for mandatory food information. Article 6 states that the basic requirement of the food information is that any food planned for consumer should be supplemented with food information as stipulated under this Regulation. Article 8 establishes the responsible party of the food information. It should be the food business operator under which name the food is marketed, in case if that operator is not established in the EU then the liable operator is the importer in the EU market. Taking into account the aim of the Regulation 1169/2011⁷² to protect health and interests of the consumer two of the various advancements introduced by the regulation earns particular attention.

Eurostat has published statistical reports on the overweight issue among the EU Member States. First, in 2011 indication showed that eight between 25 percent of EU Member State nationals are overweight. The data was compiled over the year of 2008 and 2009.⁷³ Second, in 2016 it was also concluded that in the ratio of almost one adult of six in the EU Member States is to be considered overweight. The data was collected through 2014.⁷⁴ Both of the reports show still high number of overweight problem for the EU Member States population. These results are also one of the contributors for the development of the nutrition and food labelling area in the EU. They also provide evidence that the nutrition labelling of the food is relevant topic for nowadays food law area of the EU.

Among the overweight problem of the EU population the WHO publication of 2004 outlined the need for policies of indicating allergen ingredients in the food. Food allergens are defined as the ingredients of the food that cause adverse reactions. Food intolerances are defined, as the ingredients of the foods that cause abnormal physical reaction of the body but that are not allergic ones. Both of them are food sensitivity reactions. It had been suggested to advance the food labelling so

⁷⁰ *Supra* note 5.

⁷¹ *Ibid.*

⁷² *Ibid.*

⁷³ *Supra* note 1.

⁷⁴ *Supra* note 2.

it would include the most common allergens.⁷⁵ In the following years the EU through various initiatives discussed and made above-mentioned advancements in the allergen labelling area. The EU legal instruments introduced allergen mandatory labelling already in 2005 as reported above. Today, in the Regulation 1169/2011⁷⁶ Article 9 section 1 part (c) states that ingredients listed in the Annex II or originated from a substance in Annex II used in the food manufacturing must be mentioned in the food label. Annex II currently recognises 14 allergens; they will be named below. Yet the legal instrument is silent on the issue of traceability or cross-contamination issue also known as precautionary or advisory labelling. Cross-contamination occurs when allergen unintentionally becomes part of the food through shared manufacturing equipment or facilities.⁷⁷ The Commission in its Green paper on "General principles of food law" already discussed trace level presence of allergens in 1997⁷⁸. However, these allergen thresholds after which the manufacturer can place a precautionary label on a product so far have not been harmonized among the EU Member States. It has led to current situation where manufacturers use precautionary labelling to safeguard their own and consumers' interests in case if in some product the cross-contamination threshold really reaches the level of actually causing an adverse allergic reaction. However, what this also does is reduces the available and labelled as "safe" products for the allergic and intolerant people. Therefore, this unregulated field of food labelling is still a health issue for nowadays.

The Regulation 1169/2011⁷⁹, which is the main food information for consumer document in the EU now, has consolidated many legal acts of the food law field as well as introduced various amendments as discussed above. Yet for the reasons mentioned above the particular two of the advancements will be the main focus of this research.

2.1. Nutrition information

In the European Food and Nutrition Action Plan 2015-2020 the WHO Regional Committee for Europe has encouraged the European states to improve and promote front of pack labelling systems. It is believed that front of pack labels are more consumers friendly and their positive impact on making healthier choices by consumers are highlighted.⁸⁰ Thus more front of pack label systems adopted by the EU Member States are to be expected in the future.

⁷⁵ *Supra* note 56.

⁷⁶ *Supra* note 5.

⁷⁷ K.J. Allen, Remington B.C., Baumert J.L., Crevel R.W.R., Houben G.F., Brooke-Taylor S., Kruizinga A.G., Taylor S.L. "Allergen reference doses for precautionary labeling (VITAL 2.0): Clinical implications," *The Journal of Allergy and Clinical Immunology*, January 2014, Vol 133, Issue 1, pp. 156–164.

⁷⁸ *Supra* note 29.

⁷⁹ *Supra* note 5.

⁸⁰ World Health Organization Regional Committee for Europe. European Food and Nutrition Action Plan 2015–2020. 2015. Available on: http://www.euro.who.int/__data/assets/pdf_file/0003/294474/European-Food-Nutrition-Action-Plan-20152020-en.pdf?ua=1. Accessed October 19, 2018.

As argued there are mostly three types of front of pack labelling. First, there is nutrition labelling based on the scientific facts, which basically states the nutrition value found in food. This type of labelling is used in the EU legal acts. Second, there is a certification system that allows using specific label only once the requirements set by it are met. As an example for this type of labelling the research names the Keyhole label of the Sweden. It is a nutrition label that can be used on the product that has lower levels of salt, sugar and fat and more whole grains and fibre. The label is part of a voluntary scheme yet in order to be part of it the products should fulfil certain nutrition criteria set for the specific food group.⁸¹ Third, there is front of pack labelling system that contains assessment information such as whether the nutrition value present in the product is high, medium, low compared to the recommended daily intake. This type of labelling is also traffic light labelling system that is present in the UK.⁸² All of the mentioned front of pack presentation systems will be analysed in this research.

On 8 March 2017 the public statement was issued of Nestle, Coca-Cola, Mondelez International, Mars, PepsiCo and Unilever companies. It notified about the initiative to introduce colour coded nutrition label system based on portion sizes in reference to daily intakes. It aims to establish one nutrition labelling format for involved companies' products in the EU that is unified and reliable nutrition label system across the Europe and is also in line with the EU laws. They argue that different national systems would impede consumer consideration of labels as well as would be an obstruction to free movement of goods. The statement specifically indicates the incentive to figure how to upgrade the label system of the UK so the colour coding would be in reference to portion size as well.⁸³ The initiative has already received negative side marks because by defining the colours on portion basis many products that were defined as unhealthy would actually become healthy and green labelled. For now it is unknown when the new system will be placed on products. The representative of one of the companies stated that the governments of the EU Member States would be consulted as well.⁸⁴ This announcement serves as another great example how the traffic light system introduced by the UK would still make a huge impact to food product nutrition labelling for the EU as a whole even though the UK itself is set to exit the union. Overall the idea to transfer the colour labels to portion sizes the author find useful and argues would actually make the consumers less confused. As noted above the colouring of products based on 100 grams or 100 ml actually was one of the negative remarks about the traffic light labelling system because the actual consumption sizes for products differs.

⁸¹ Nordic Co-operation. About Keyhole. Available on: <http://www.norden.org/en/nordic-council-of-ministers/council-of-ministers/nordic-council-of-ministers-for-fisheries-and-aquaculture-agriculture-food-and-forestry-mr-fjls/keyhole-nutrition-label/about-keyhole>. Accessed April 12, 2017.

⁸² *Supra* note 60.

⁸³ Evolved Nutrition Label. Promoting Healthier Diets through an Evolved Colour-Coded Nutrition Labelling Scheme. 8 March 2017. Available on: <http://evolvednutritionlabel.eu/public-statement/>. Accessed October 19, 2018.

⁸⁴ Food Navigator. Six industry giants to launch UK-style traffic light labels in Europe by Niamh Michail. 8 March 2017. Available on: <http://www.foodnavigator.com/Policy/Six-industry-giants-to-launch-UK-style-traffic-light-labels-in-Europe>. Accessed October 19, 2018.

2.2. Allergens

The specific allergen indication has been clearly regulated by the Regulation 1169/2011⁸⁵. Yet precautionary labels that are also an area linked to allergens are non-harmonized field and none of the EU Member States have developed any rules in this regard except voluntary guidelines accepted in the UK. However, any binding rules about usage of advisory labels at Member State level most likely would become an obstacle to free movements of goods. It follows that further harmonization of precautionary labels should happen at the EU level as well. Though, the currently unregulated field is the reason for precautionary label common usage. As the main reason for cross-contamination has been mentioned shared manufacturing equipment and manufacturing facilitates. Yet the EU Regulation 852/2004⁸⁶ lays down the rules for food hygiene during production and handling as well as together with Regulation 178/2002⁸⁷ regulates possible contamination managing. When the manufacturers are not certain that they have followed the rules strictly enough to avoid cross contamination of allergen ingredient they tend to use precautionary label.⁸⁸ Hazard Analysis and Critical Control Points (further in the text – HACCP) principles set good hygiene application rules and are supported by the EU.⁸⁹ When by HACCP principle application elimination of cross contamination could not be accomplished then precautionary labelling should be used.⁹⁰ HACCP principles to some extent have influenced the rules in the EU yet further analysis of the HACCP principles will not be carried out since the focus of this research is to analyse the relevant EU law framework.

Likewise it has been understood that advisory labelling should be used to inform the consumer about actual risk of cross-contamination that was first of all addressed through risk assessment and afterwards followed by procedures to minimize it. Yet it has been suggested that other manufacturers uses this advisory labelling as substitute for actual risk management of allergens.⁹¹ The various studies have shown that there is a growing tendency of allergic and intolerant consumers to disregard the precautionary labels. The reasons are either one or several following. First, since the advisory labelling is so widespread the consumers contemplate that person cannot escape eating foods without it. Second, consumers think that manufacturers uses the advisory labelling as a way to protect themselves from claims against them in case of any allergic reaction of consumer due to cross contamination. Third, consumers adopt a perception that different wordings of advisory labels suggest lower risks compared to one another and consumers will

⁸⁵ *Supra* note 5.

⁸⁶ Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs, *OJ L* 139, 30.4.2004, pp. 1–54, Available on: <http://eur-lex.europa.eu/legal-content/en/ALL/?uri=CELEX:32004R0852>. Accessed October 19, 2018.

⁸⁷ *Supra* note 43.

⁸⁸ *Supra* note 69.

⁸⁹ European Commission. Food. Available on: https://ec.europa.eu/food/safety/biosafety/food_hygiene/legislation_en. Accessed October 19, 2018.

⁹⁰ *Supra* note 69.

⁹¹ *Supra* note 7.

avoid only products with less unclear warning. Fourth, producers previous advisory label usage practise have led to belief that they are applied without further thought such as warning on milk that it might contain lactose. In contrary the drawback of introducing the uniform approach for advisory labelling is the different thresholds not only for each product but might be also for different populations since human response to allergen depends also on genetics.⁹² The main notion shows that new developments in the area are necessary to change the consumers' perceptions.

Nonetheless the current precautionary label usage framework has created overdoing. As will be noted below various researches have concluded that these labels were placed on products without actual distinguished allergen trace. These and similar kinds of developments have led to the customers behaviour of not trusting the label altogether. It leads to absurd situation that the product can no longer be safe to the consumer and the whole purpose of the allergen labelling is somewhere gone.

⁹² *Ibid.*

3. INTERACTION BETWEEN NATIONAL AND EU LAWS

At first the research will look at the relevant EU rules of the defined framework of research – information of allergen provisions for prepacked and non-prepacked food and relevant nutrition declaration rules and front of pack nutrition labelling systems in place if any. Then the research will overview the law and practice specifics of certain Member States; countries like Latvia, the Netherlands, the UK and France will be examined. These EU member states were chosen due to either a state being a residence place thus ability to observe the rules in practise – Latvia – or states adopted or reported practise for voluntary front of pack nutrition labelling schemes – the UK, the Netherlands and France.

In order to examine the practical placement of the nutrition labelling systems and allergen precautionary labelling one online distance selling grocery store in each of the selected countries and ten sample products were chosen. Products were cashew nuts, olive oil, orange juice, cottage cheese, Greek yogurt, fruit yogurt, bread, cookies, dark chocolate and chocolate confectionery. These products were chosen because either most of the cases they contain allergen ingredients – cashew nuts, cottage cheese, Greek and fruit yogurt, bread, cookies, dark chocolate and chocolate confectionery – or they have been named as a disputable cases for the traffic light labelling scheme – orange juice and olive oil. Four indicators were nominated that would be checked in the products page – 1) whether any front of pack label is present, 2) whether there is additional form of front of pack labels such as energy value repetition, traffic light label or healthy logo, 3) whether the allergen notice is present or allergens present in the product is emphasized differently (e.g. underlined, in bold etc.) and 4) whether there is also noted precautionary label of allergen presence, for example, “manufactured in the same factory as such allergens as...”. The results of the study for each country will be examined in the relevant country’s subchapter.

Additionally, since two of the member states also requests that allergen information should be given in writing by mass caterers as will be discussed below, four menus of randomly chosen restaurants in those countries will be examined along with two menus of home delivery services for those two specific states.

3.1. EU law

Nutrition labelling

Nutrition labelling in the Regulation 1169/2011⁹³ are primarily regulating Article 9 section 1 part (I) and Articles 29-35. Article 9 section 1 part (I) says that one of the components of the mandatory labelling is nutrition declaration; Article 9 section 2 allows the information of the nutrition declaration additionally to numbers and word be expressed with symbols as well. Articles 29 to 35 refer to the section of nutrition declaration. Article 30 section 1 defines that nutrition declaration shall include energy

⁹³ *Supra* note 5.

value and fat, saturates, carbohydrate, sugar, protein and salt; section 3 outlines that additionally either energy value alone or energy value collected with fat, saturates, sugars and salt can be repeated. Article 32 that in its section 2 regulates that expression of quantity of nutrition's and energy value shall be per 100 g or per 100 ml in the section 4 expresses that additionally it might also be communicated as a percentage of the reference intakes prescribed in the Annex XIII. Article 33 section 1 also allows expression of energy value and nutrition's to be stated on a basis of portion or unit given that total portions or units contained in the package are indicated on the label as well as the amount used for portion or unit is also identified on label. Article 34 in section 2 specifies that all the nutrient declaration should be given in tabular format if it is possible by the space of label. If not then linear nutrition declaration expression is allowed. Article 35 allows the EU Member States to use additional forms of expression and appearance such as symbols and graphical forms in its section 1 if the subsequent necessities are fulfilled – (a) based on consumer research and information is not misleading, (b) prior the development discussions with area participants took place, (c) aim is to contribute to consumer understanding of the nutrition importance of the food, (d) based on scientific proof of average consumer understanding of such form of communication, (e) they are based on intakes presented in Annex XIII if specified in case if not defined then generally accepted intake, (f) communication is unbiased and fair, (g) communication does not hinder free movement of goods. Section 2 allows EU Member States to recommend to manufactures use specific form of expression for nutrition declaration that they consider the most relevant fulfilling the criteria set above; such forms should also be presented to the Commission. Section 3 sets the task for the EU Member States to monitor such additional communication forms present in their states.

In certain sources "front of pack" labelling has been highlighted. Recital 41 of the Regulation 1169/2011⁹⁴ offers some guidance of this term. Nutrition information should be put in the principal field of vision so it can be easily seen and serve as guidance for the consumer before his choice. The "field of vision" in Article 2 section 1 part (k) of Regulation 1169/2011⁹⁵ explains that it means all package information that can be read from one standpoint. The "principal field of vision" Article 2 section 1 part (l) of Regulation 1169/2011⁹⁶ is described as view of package that is most likely to be seen as the primary look by the consumer at the time of buying. This principle field of vision is also known as "front of pack" as well as somewhat "back of pack". It is understood that all the nutrition information should be in this same field of vision. However, it is specified that the most important nutrition information can be repeated in the principle field of vision – front of pack. As stated above the information that is the most important and can be repeated is either energy value or energy value together with fat, saturates, sugars and salt as identified in Article 30 section 3. During the research the front of pack labelling will have attention devoted to.

⁹⁴ *Ibid.*

⁹⁵ *Ibid.*

⁹⁶ *Ibid.*

Allergen labelling

Allergen labelling in the Regulation 1169/2011⁹⁷ is mainly regulated by Articles 9 section 1 part (c) and Article 21, also Article 44, which will be discussed below. Article 9 section 1 part (c) states that among the mandatory items that needs to be presented in the food label also are allergen ingredients that are either listed in Annex II or originated from substances listed in Annex II. Annex II currently recognises 14 allergens; they are – cereals with gluten, crustaceans, eggs, fish, peanuts, soybeans, milk, nuts, celery, mustard, sesame seeds, sulphur dioxide and sulphites within prescribed concentration level, lupin, mollusc. Article 21 regulates labelling of allergen products or their substances that causes allergies. Allergens shall be included in the list of ingredients and shall be distinguished from other ingredients through a typeset (in bold, capital letters, underlined etc.) as stated in section 1. In the nonappearance of the ingredients there should be word “contains” followed by the allergen(s) or substance(s) from allergens as listed in Annex II.

Under the Regulation 1169/2011⁹⁸ Article 38 regulates the adoption of national measures by the EU Member States. Section 1 states that national measures cannot be adopted in the matters already harmonised by this regulation without authorization by the EU law; if they are allowed they still cannot hinder the free movement of goods hence internal market. Section 2 allows EU Member States to adopt national measures in fields that are not specifically harmonized by the EU law, yet these measures cannot restrict free movement of goods.

Article 44 of the Regulation 1169/2011⁹⁹ regulates national measures for non-prepacked food. Section 1 states that in cases where the foods are presented to the consumer or mass caterers or packed on sale sites by buyers request the providing of ingredients that are allergens or substances originated from allergens is mandatory, however, other particulars of mandatory labelling is not required unless EU Member State has adopted a national measure considering them required. Section 2 states that EU Member States can adopt measures about the way how the mandatory allergen information stated in section 1 are to be presented to the consumer. In the “Questions and Answers on the application of the Regulation 1169/2011”¹⁰⁰ dated on 31 January 2013 several aspects of Article 44 have been clarified. It is stated that the business operator cannot provide the mandatory allergen information only upon request by the consumer since it has to be easily available. This can be done through modern technology tools as well. It is added that in case if the EU Member State has not adopted the national measures on how the allergen information should be communicated to the consumer then the EU rules of prepacked foods is available. That means information should be communicated in a written form. However, it is also stated that the EU Member States can allow through

⁹⁷ *Ibid.*

⁹⁸ *Ibid.*

⁹⁹ *Ibid.*

¹⁰⁰ European Commission’s Health and Consumer Directorate General. Questions and Answers on the application of the Regulation (EU) N° 1169/2011 on the provision of food information to consumers. 31 January 2013. Available on: https://ec.europa.eu/food/sites/food/files/safety/docs/labelling_legislation_qanda_application_reg1169-2011_en.pdf. Accessed October 19, 2018.

its national measures that allergen information is available only upon request by the consumer even though this kind of information communication is not considered a way how to provide information. If, however, a Member State adopts such provision then business operator should in clearly visible space indicate in a written form that the allergen information is available upon request.¹⁰¹ Yet as has been indicated this clarification actually has a clash in itself.¹⁰² From one side it is stated that information on allergens cannot be given upon request yet from the other side it is allowed for Member States to adopt such national measures where giving allergen information upon request is permitted.

Recital 48 of the Regulation 1169/2011¹⁰³ adds particular value to the allergen representation for non-prepacked foods. It emphasizes that the Member States keep the right to decide on the food information presented about the non-prepacked food yet in all the circumstances it highlights the high necessity of allergen information for particular consumer group. Due to indications that most of the allergy episodes lead back to non-prepacked food the recital states that allergy information should always be given to the consumer.

Article 13 of the Regulation 1169/2011¹⁰⁴ states the presentation of the mandatory food information. The information should be easily visible as stated in Section 1. Section 2 stipulates that information should be clearly readable and characters font size in X-height as stated in Annex IV is 1,2 mm or greater. Characters font size can be 0,9 mm or greater in case if the largest surface area of package is less than 80 cm² as stated in section 3. This rule might also be relevant during further research.

Another important requirement set by the Regulation 1169/2011¹⁰⁵ in its Article 15 is language requirements. Mandatory food label information should be given in a language which the consumers of the Member State, where the food product is marketed, understands as stipulated in the section 1 of Article 15.

As an additional point of reference the research will plan to look at the foods sold through distance selling. Article 14 of the Regulation 1169/2011¹⁰⁶ regulates the food labelling for distance selling. It states that all the list of mandatory particulars except "use by" date should be available before the purchase. Yet all the mandatory data should be available at the time of delivery.

Regulation 1169/2011¹⁰⁷ according to Article 55 comes into force starting from 13 December 2014, yet mandatory nutrition declaration emphasized in Article 9 section 1 part (l) applies starting by 13 December 2016.

¹⁰¹ *Ibid.*

¹⁰² Finardi C., Gonzdlez Vaque L., "European Food (Mis)Information to Consumers: Do Safety Risks Lie Just Around the Corner?" *European Food & Feed Law Review*, 2015, Vol. 10, Issue 2, pp. 92 – 106.

¹⁰³ *Supra* note 5.

¹⁰⁴ *Ibid.*

¹⁰⁵ *Ibid.*

¹⁰⁶ *Ibid.*

¹⁰⁷ *Ibid.*

It can be concluded that the EU law sets the main framework for the nutrition and allergen labelling yet it also gives certain latitude for the Member States on labelling requirement implementation.

3.2. Case of Latvia

The author chose the example of Latvia as it is a native state and better and full access to the various advancements in the food-labelling area necessary in the later stage at research can be ensured.

Allergen labelling

In Latvia "Law on the Supervision of the Handling of Food" in its Article 13 section 3 stipulates that the Cabinet of Ministers regulates the norms about prepacked food labelling as well as information about non-prepacked food.¹⁰⁸ Cabinet of Ministers Regulation No 115 "Requirements for prepacked food labelling"¹⁰⁹ upheld the food labelling rules for prepacked food stated in the Regulation 1169/2011.¹¹⁰ Cabinet of Ministers Regulations No 595 "Requirements for information provision of non-prepacked food"¹¹¹ are adopted in line with the Article 44 of the Regulation 1169/2011.¹¹² The point 4 of the Regulation No 595¹¹³ state that in Latvia information about the allergens as specified in Regulation 1169/2011 Article 9 section 1 part (c) should be provided in writing. That also means in the restaurants and cafes – places of mass caterers. Point 5 gives an exception if the name of the product clearly indicates the allergen as regulated by the EU law. Point 8 gives three more exceptions if the product is packed by the consumer request at the sale premises, which are - 8.1. a market, 8.2. a sale place where scales or cash machines due to technical reasons can print only a limited amount of signs as well as 8.3. a sale places where the consumer packs the product himself. Still, as specified in Point 9 the exceptions mentioned in point 8 can only be applied if the sale place puts a sign in a clear and visible place how and where the allergen information can be obtained as well as the information is provided to the consumer in the distribution place before a purchase and without additional payment. The regulation also stipulates different typeset for allergen ingredients in the list of ingredient as well as

¹⁰⁸ Pārtikas aprites uzraudzības likums (Law On the Supervision of the Handling of Food), Saeima, The Parliament of the Republic of Latvia, adopted: 19 February 1998, entered into force: 20 March 1998. Available on: <https://likumi.lv/doc.php?id=47184>. Accessed October 19, 2018.

¹⁰⁹ Prasības fasētas pārtikas marķējumam (Requirements for prepacked food labelling), The Cabinet of Ministers of the Republic of Latvia, adopted: 3 March 2015, entered into force: 6 March 2015. Available on: <https://m.likumi.lv/doc.php?id=272619>. Accessed October 19, 2018.

¹¹⁰ *Supra* note 5.

¹¹¹ Prasības informācijas sniegšanai par nefasētu pārtiku, (Requirements for information provision of non-prepacked food), The Cabinet of Ministers of the Republic of Latvia, adopted: 20 October 2015, entered into force: 23 October 2015. Available on: <https://likumi.lv/ta/id/277278-prasibas-informacijas-sniegsanai-par-nefasetu-partiku>. Accessed October 19, 2018.

¹¹² *Supra* note 5.

¹¹³ *Supra* note 111.

if the list of ingredients is not provided then the sign with “contains” and stated allergens present would still need to be put up as defined in point 4 to be in line with Regulation 1169/2011.¹¹⁴

Nutrition labelling

About the nutrition declaration speaks point 11, which indicates that if there are no other rules given by food handling legal acts, then nutrition declaration can be provided in one of the following ways: 11.1. energy value, 11.2. energy value together with fat, saturates, sugar and salt or 11.2. energy value together with fat, saturates, carbohydrate, sugars, protein and salt. Point 13 of the Regulations No 595¹¹⁵ stipulates that all the data of mandatory information except “use by” data should be provided before the purchase and all the data should be given at the time of the delivery in case of distance selling.

The author concludes that the national measures introduced for non-prepacked foods that makes allergen information mandatory in writing is actually a positive development for the Latvian consumers who suffer from food allergies or intolerances. However, the author notes that there is no guidance for precautionary labels in regard to allergens.

Practical study

For the practical placement of the allergen information as well as the nutrition labelling systems the author examined the ten food products mentioned above in the online grocery store “e-maxima”. All the obtained data can be found in the annex No 5.

First, the front of pack labels were examined. Only one of ten products had any front of pack label and it was simply for the repetition of the energy value. The reference used was based on per portion. All the prepacked products information also contained full nutrition declaration; even the confectionery that was also observed as non-prepacked. Yet the other non-prepacked product cookies did not bear full nutritional information just its amount in the energy value.

Second, even for the one example with front of pack label no additional forms of expression were observed.

Third, allergen information was provided for all the products. Exceptions were olive oil and orange juice. However, it was reasonable to assume since their name clearly indicated that they contain olive oil and oranges, which were not included in the allergen list given by the Regulation 1169/2011.¹¹⁶ Allergen information was also presented differently from other ingredients in the product such as in bold or in capital letters or both.

Fourth, the precautionary allergen information was found on five out of eight products containing any allergens. It was about more than half of the products. All the precautionary labels informed that the “product may contain traces of...”. In the

¹¹⁴ *Supra* note 5.

¹¹⁵ *Supra* note 111.

¹¹⁶ *Supra* note 5.

examined product list were also included two products that provided for possibility to order already prepacked chocolate confectionery and cookies as well as possibility to order your own amount of grams. While the confectionery did not show any difference in regard to precautionary allergen labels the cookies that were marketed as the same product actually showed difference – the prepacked contained the precautionary label while the non-prepacked actually did not.

Author noticed that it was possible to order the food products without opening their information, however, it is similar as customer purchasing food in the store and not reading the mandatory information given. The store disclaimer was found at the end of products information for all the products. It had a statement that product information provided online can be different from that on the actual product due to changes of products ingredients thus store advised to check the actual product information on the package as well.

The author concludes that in Latvia there is no persistent front of pack labelling system used as well as there is no any additional expression forms for it as well. As regards the allergen information it was provided for the products concerned and also in differentiated style from the rest of the ingredients. Nonetheless, the precautionary labels were used extensively and since for the same product in one it was used and in another was not it raised more concern about the actual necessity for that. The disclaimer placed by the store raised the question of whether it can actually release the store from liability. Since the law in place states that all the mandatory information except “use by” date should be given before the purchase in case of distance selling the disclaimer more likely can be classified as rather a precautionary measure taken by store. Nonetheless, the study of legal value of the disclaimer might be a subject of another research.

Mass caterers and distance selling

Author also examined several menus of the cafeteria or restaurants available online. The results can be seen in the annex No 7. In several restaurants allergens are not emphasized in the menus; some of the caterings use a phrase “foods may contain allergens”. The author concluded that it is not in line with the rules put in place by the Latvian law. Additionally, author examined two restaurants that provide possibility of ready meal home delivery. Results can be seen in the annex No 8. In one of the stores for each product allergen information is available, the author notes that it is possible to order without actually opening the full information about the product. However, author also identifies that the customer with special requests such as necessity for allergen information is also under added responsibility to look whether such information is available as in this case it is. In other online store the ingredients are noted yet no distinguishing of allergens.

Since these kinds of examples can be found almost one and a half year later after the law came in force that leads to a question who is the responsible authority for compliance with these rules. The author clarified that the Food and Veterinary Service that is functioning under Ministry of Agriculture is the responsible authority in

Latvia for checking the food compliance with labelling rules.¹¹⁷ Since there is observed inconsistency with law the current system has enforcement issues. The penalties for non-compliance also include administrative sanctions such as a warning, fine or even suspension of food business operations.¹¹⁸ This particular issue with enforcement problem in Latvia has discovered a whole new field for exploration. Yet this will not be further discussed in the current research.

3.3. Case of the Netherlands

The author chose to look at the Netherlands case since certain labelling choices also start to reflect the traffic light labelling chosen by the UK.¹¹⁹ It might suggest that the system chosen by the UK will follow in other EU Member States as well. It also implies the consequences that might follow.

Allergen labelling

In addition to the Regulation 1169/2011¹²⁰ that is directly applicable to the Netherlands it has also adopted a "Commodities Act for Allergen Information of Non-prepacked Food".¹²¹ Article 2 of the rules stipulate that in places of non-prepacked food sale there is a clearly visible sign that informs the consumer that allergen information is available indicating also the way how it can be obtained. If the food is sold at different places in the same premises the sign should be available at all of the places. Additionally, allergen information that is provided in writing can also be given through electronic means. Article 3 states that allergen information can also be presented to the consumer upon request if the seller such decides. However, it can be done only if the information can be provided to the customer before the purchase without a delay, it always should be available in writing for staff and food safety authority of the Netherlands as well as there is a sign clearly visible to the customer where such allergen information can be obtained.

The author notes that the Netherlands has chosen to give the power to the food sellers to decide the way how they would like to present the allergen

¹¹⁷ Ministry of Agriculture. Pārtikas izplatīšanas uzraudzība (Monitoring of food distribution). Food and Veterinary Service. Available on: <https://www.zm.gov.lv/partikas-un-veterinarais-dienests/statiskas-lapas/partikas-izplatisanas-uzraudziba?id=7426#jump>. Accessed October 19, 2018.

¹¹⁸ Ministry of Agriculture. Food Surveillance. Food and Veterinary Service. Available on: <https://www.zm.gov.lv/en/partikas-un-veterinarais-dienests/statiskas-lapas/food-surveillance?nid=2294#jump>. Accessed October 19, 2018.

¹¹⁹ Voedzaam & Snel. We gaan de goede kant op: Suiker labels bij frisdrankenschap AH (We are on the right track – sugar labels for drinks), 22 September 2016. Available on: <http://www.voedzaamensnel.nl/blog/we-gaan-goede-kant-op-suiker-labels-frisdrankenschap-ah/>. Accessed October 19, 2018.

¹²⁰ *Supra* note 5.

¹²¹ Warenwetregeling allergeneninformatie niet-voorverpakte levensmiddelen (Commodities Act for Allergen Information of Non-prepacked Food), Regulation of the Minister of Health, Welfare and Sport, adopted: 7 August, 2014, entered into force: 13 December, 2014. Available on: <http://wetten.overheid.nl/BWBR0035516/2014-12-13>. Accessed October 19, 2018.

information to the customer in case of non-prepacked food. It is also noted that rules about advisory labelling have not been mentioned.

Nutrition labelling

It was announced in 2013 that the Netherlands becomes the first EU member state with authorised healthy Choice logo; also known as Vinkje. The logo represents single statement of nutrient levels existing in the specific product. The level of present nutrients in the product is compared to the levels of nutrients present in the similar product. The logo was presented by the Ministry of Health, Welfare and Sport of the Netherlands to the European Commission in line with Regulation 1924/2006¹²² and was approved as an official nutrition claim. It differs from regular nutrient claim because it considers several nutrients for evaluation.^{123 124} However, at the end of 2016 it was announced that the healthy choice logo will be no longer used since it was confusing for the consumers; it was voluntary and some food business operators did not participated in the programme so at the end buyers were confused and could not tell whether there is no logo because the product is unhealthy or because the manufacturer did not participate in the programme. Now the initiative has been announced to develop an app so the consumers can find out nutrition information about the product and compare it with similar products. Yet the concern has also been expressed that part of the consumers will never even download it even more use it.¹²⁵ It is logical that the necessity for an app that first needs to be acquired to afterwards assess the healthiness of the product will make the consumer less interested in actually obtaining the information. Moreover the information being available only through app requires the consumer to have a smartphone. The healthy logo situation in the Netherlands reveals two problems – first, a voluntary label confuses the consumers and second, additional expression forms of nutrition information can create discrimination if used through electronic means. This is conflicting to Article 35 section 1 part (f) of the Regulation 1169/2011¹²⁶, which regulates additional forms of presentation implementation. The aim of the harmonization is to achieve some basic content that is common to all the EU Member States. That is what the EU did providing basic rules about food information to the consumers. The EU also gave discretion to the Member States by allowing additional forms of presentations for front of pack nutrition declarations. As discussed previously there are three forms of front of pack labelling – simple data repetition,

¹²² *Supra* note 49.

¹²³ The Choice programme. PRESS RELEASE: Dutch Choices logo receives national and EU approval, April 16th, 2013. Available on: <https://www.choicesprogramme.org/news-updates/news/press-release-dutch-choices-logo-receives-national-and-eu-approval>. Accessed October 19, 2018.

¹²⁴ World Health Organization. Policy - Besluit van de Minister van Volksgezondheid, Welzijn en Sport houdende goedkeuring van het Vinkje als voedselkeuzelogo (Approval of the Choices logo). Available on: <https://extranet.who.int/nutrition/gina/en/node/22927>. Accessed October 19, 2018.

¹²⁵ Food navigator. Dutch ditch healthy eating logo for an app by Niamh Michail. 25 October, 2016. Available on: <http://www.foodnavigator.com/Policy/Dutch-ditch-healthy-eating-logo-for-an-app>. Accessed October 19, 2018.

¹²⁶ *Supra* note 5.

healthy logo or traffic light. The Netherlands regulation of the healthy logo shows that voluntary front of pack system application do confuse the consumers. That suggests that also these additional forms of presentations should be combined in order to eliminate the consumer confusion. To what extent such coordination should happen is a different question. Would it be complete label unification or rather further harmonization the author would argue the second. Front of pack vision of package has a purpose to repeat for the consumer the most important nutrition information. Complete mandatory label unification would require certification system that will most likely be costly. It also places additional burden to small and home businesses by increasing production costs and money investments. Furthermore, it might even prevent them entering the market. At the end certificated label system might not even be proportionate. The aim of informing consumer about the most important nutrients in the food would be achieved if one front of pack label system would be adopted across the Europe. It might be left to be voluntary. If a manufacturer wants to add front of pack label then he can do it but it would be one of a kind label based on harmonized rules across all the EU.

Practical study

The author conducted the research about the ten food products in the online grocery-selling store "Allerhande". The results obtained can be seen in the annex No 4.

First, it was noted that different front of pack labels were present either the healthy logo or nutrition energy value; either one of them were present on seven out of ten products. Thus even though the healthy logo initiative has been cancelled it can still be found on products.

Second, out of those seven four had a healthy logo sign, which as described above, means that product compared to other in the same category is healthier. Yet as also mentioned previously the programme now is going to be abandoned. The rest of three were front of pack labels with nutrition declaration in form of repeated energy value. Besides healthy logo there were no other additional forms of expression noticed. However, information can be found that at least one store owned by Albert Heijn in the Netherlands presents its own colour coded labelling as regards the amount of sugar added. The colour codes are added to the shelf in the store where the soft drinks are displayed.¹²⁷ Nonetheless, the two different cashew nuts also had their names written on different colour background. From outside the packages looks the same. However, the name put on green label was unsalted cashew nuts while the cashew nuts written on red label were salted. It might be that it is written with thought that salted ones are less healthy due to higher amount of salt, however, the author would rather state that most likely it is just coincidence.

Third, allergen information was present on all the relevant products besides orange juice and olive oil. The information was given in bold and capital letters. Additionally, the author noticed the signs of "no gluten" and "no cows milk" among the product information that the consumer can find before purchase. Either one of

¹²⁷ *Supra* note 119.

the signs or both were present in four products – besides orange juice and olive oil also being on cottage cheese and chocolate confectionery.

Fourth, out of eight products that contain allergens five were with precautionary labelling. The precautionary label added to the products stated, “made in factory where other allergens are also processed”.

It was possible to order food without getting acquainted with the full product information. Also in this online store the author saw the disclaimer placed at the bottom of product information. It gave a statement that the seller gives his best effort so the product information such as ingredients, allergy and nutrition information is as accurate as possible. However, since it can regularly change the store recommends the customer still check the product information before consumption also.

The author concludes that front of pack labelling is common in the Netherlands either with repetition of energy value or a healthy logo that is still seen on the products. Yet other additional forms of expression beside owners own initiatives are not seen. Allergen information is provided as specified under the law, precautionary allergen labelling also is commonly present.

3.4. Case of the United Kingdom

The author’s choice to look at the UK at this time when it has chosen to leave the EU can be questioned. However, the UK was the first state in the EU that started to use nutrition-labelling system, in particular the traffic light labelling. This choice has been questioned whether it actually complies with the rules of internal market of the EU. Additionally, private initiative of several companies as noted above is now following the steps of the UK by adopting traffic light labelling system as well. Thus studying the example of the UK is a good way to see what shortcomings this labelling system presents as well as its implications to the common market.

Allergen labelling

When looking at the UK in this research the main focus will be on the England separately. The UK through the Food Information Regulations 2014¹²⁸ introduced the rules for allergen labelling of non-prepacked food in addition to already applicable Regulation 1169/2011.¹²⁹ The section 5 of the legal act in its part (1) states that the business operator may choose to provide the allergen information as specified in the Regulation 1169/2011¹³⁰ Article 9 section 1 part (c) also upon the request by the consumer. In its part (3) it clarifies that in case of providing the information upon request the business operator must indicate that the information on allergen can be found by asking a staff. Part (4) explains that in such cases the information on allergens can be given in writing by label enclosed to the food or on a menu, notice or sign where it is clearly distinguishable and visible in a place where the customer

¹²⁸ The Food Information Regulations 2014, 2014 No. 1855, adopted: 14 July, 2014, entered into force: starting 15 August, 2015. Available on: <http://www.legislation.gov.uk/uksi/2014/1855/made/data.pdf>. Accessed October 19, 2018.

¹²⁹ *Supra* note 5.

¹³⁰ *Ibid.*

chooses the food. Part (5) signifies that allergen information is relevant not only about the products listed in the Annex II of the Regulation 1169/2011¹³¹ but also about the substances that have originated from the products in the Annex II and are still present in the final product.

Food Standards Agency operates as the main body of the food safety in regards to food labelling law enforcement in the England.¹³² The authority has prepared a technical guidance document on the food allergen labelling.¹³³ This guidance suggests that as regards the precautionary labelling it should only be used after the risk assessment and once it is established that the real risk for allergic persons do exists. The same authority has also adopted voluntary guidance on allergen management and consumer information.¹³⁴ This guide serves as a best practice guide for food business operators about placing advisory labelling. Even though this guide is only voluntary the author positively values the existence of such document. Since stakeholders were also involved in the process of adopting this support document it can be reasonably believed that they will also apply it to their practice. Nonetheless, sole existence of it is a positive example for other EU Member States until harmonized approach is adopted among them all by the EU legal act.

In 2014 the study was completed by the Food Standard's Agency that showed the allergen precautionary labelling and actual allergen presence level in the food. The study revealed that half of the products that bear such a label actually do not contain any traces of allergens.¹³⁵ This actually even more supports the study of consumers' perceptions of precautionary labels discussed above – labels are placed to protect the manufacturers themselves and certain amount is placed without further consideration.

Nutrition labelling

In the 2013 the Public Health Minister of UK has encouraged the front of pack nutrition labelling system with an aim for the citizens to make more informed choices about the food. The system is based on three colours – green, yellow and red – green being the healthiest choice while red marks the products that consumer should be careful about including in their diet. Nutrition information for the front of pack system will include the energy value, fat, saturates, sugar and salt nutrient in the product. Before the announcement of the labelling system there have also been

¹³¹ *Ibid.*

¹³² Food Standard Agency. Food Information Regulation. Available on: <https://www.food.gov.uk/enforcement/regulation/fir>. Accessed October 19, 2018.

¹³³ Food Standard Agency. Food allergen labelling and information requirements under the EU Food Information for Consumers Regulation No. 1169/2011: Technical Guidance. April 2015. Available on: <https://www.food.gov.uk/sites/default/files/food-allergen-labelling-technical-guidance.pdf>. Accessed October 19, 2018.

¹³⁴ Food Standard Agency. Guidance on Allergen Management and Consumer Information. July, 2006. Available on: <http://www.reading.ac.uk/foodlaw/label/allergens-maycontain-2006.pdf>. Accessed October 19, 2018.

¹³⁵ Food Standard's Agency. Survey of allergen advisory labelling and allergen content of UK retail pre-packed processed foods. 4 November 2014. Available on: <https://www.food.gov.uk/sites/default/files/survey-allergen-labelling-prepacked.pdf>. Accessed October 19, 2018.

discussions with representatives of food manufacturers and health non-governmental organizations as claimed by the UK authority.¹³⁶ The discussions also involved academics, individuals and retailers. The emphasis of debates was to understand the level of simplicity and consistency for the front of pack labelling system than can be achieved within the Regulation 1169/2011.¹³⁷ ¹³⁸ It follows that the main idea of initiative was to make healthier food choices easier and less confusing for the consumer. The author can add that that colours indeed makes the choice easier because it already indicates the level of nutrient in the product by colour. However, the main concern is the way how the consumer perception of the system has developed. Consumers tend to think in line of green-good and red-bad, which is not entirely correct.

The guide to forming a front of pack nutrition label for prepacked foods was also released.¹³⁹ Since then the guide has been lastly updated in November 2016. The document informs that nutrition colour coding is additional form of expression as regulated by Article 35 of Regulation 1169/2011.¹⁴⁰ Since it is voluntary front of pack labelling then it can only be given as additional information and there should still be all the mandatory nutrition information present on the package as well. There is also noted that colours codes – green yellow or amber and red – do not characterize claims. This is argued on the grounds of recital 46 of the Regulation 1169/2011.¹⁴¹ Recital 46 declares that statement given in the same field of vision about nutritional quantities and relative pointers that is presented in a noticeable method that helps the consumer to make a valuation of foods nutritional characteristics should be categorized as nutrition declaration not a group of claims. Furthermore, the guide encourages the companies to add descriptions of high, low or medium along with the colour codes to emphasize their meaning. The guide also explains the labelling system by stating the messages communicated to consumers. For example, it is stated that red does not mean that the product should not be purchased rather the attention should be given to understand how much of the product is used. Yellow label would mean medium level of nutrient, however, consumption of such products should be supplemented with green products as well for more balance diet. Green would emphasize that the product is low on the specific nutrient; opinion is also expressed that the more green products the healthier the diet.¹⁴² Yet the author

¹³⁶ UK Government. Department of Health. Final design of consistent nutritional labelling system given green light. 19 June, 2013. Available on: <https://www.gov.uk/government/news/final-design-of-consistent-nutritional-labelling-system-given-green-light>. Accessed October 19, 2018.

¹³⁷ *Supra* note 5.

¹³⁸ Food Standards Agency. Front of Pack Nutrition Labelling: Joint Response to Consultation. January 2013. Available on: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/216997/response-nutrition-labelling-consultation.pdf. Accessed October 19, 2018.

¹³⁹ UK Government. Department of Health. Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets. 19 June 2013. Available on: <https://www.gov.uk/government/publications/front-of-pack-nutrition-labelling-guidance>. Accessed October 19, 2018.

¹⁴⁰ *Supra* note 5.

¹⁴¹ *Ibid.*

¹⁴² *Supra* note 139.

would like to note that actually it should not be expressed that unpretentious because overconsumption of just green products whose nutrients at the end of the day would still add up might actually lead to the same effect as eating one or two products with the same nutrients in red. The main emphasis should be put on the overall diet structure of consumer. Consumer should still count the green products as well. The guide also notes that balanced diet can be composed of green, yellow and red products as well. When explaining the label that is composed of various colours the guide encourages the consumer to go after the product with more greens and yellows rather than reds in the same food category. Among suggestions it is also expressed the opinion that in case if the consumer chooses the product with specific nutrient in red then for the rest of nutrient amount for that day it would be good to choose the products with specific nutrient in lower amounts. Front of pack label measures can be given for amount of 100 grams or 100 ml merely, combined for 100 grams or 100 ml and per portion as well as on basis of per portion simply if it is given for fat, saturates, sugars, salt and for energy value also expressed on basis of 100 grams or 100 ml. The guidelines also indicates levels at which the label colour will change; the table of indications can be seen in the annex No 2.¹⁴³ Overall, the explanations provided for the consumer by the guide are reasonable, however, more emphasizes should be put on the consumer's own responsibility to still follow the products place in their own diet.

In August 2016 the European Parliament has asked the European Commission to evaluate the impact on consumer selections and also common market that the traffic light labelling system has had. It should be finished by the end of 2017.¹⁴⁴¹⁴⁵ It is presumed that the results of the study will be a turning point in the front of pack labelling as regard the additional forms of expression.

The given guidelines present to the food manufacturer the opportunity to use traffic light labelling for food. Yet even though the proposed system is voluntary the officials of the UK government support it. This kind of support places additional burden to the importers in the UK market even though the application of the front of pack labelling system is voluntary. It is reported food manufacturers that make up about 60% of the food in the UK market has already voluntarily agreed to use the traffic light label system.¹⁴⁶ Since the UK's food market participants are "encouraged" to apply the colour coding system it unintentionally places an extra load to food manufacturers from outside the UK as well.

¹⁴³ *Ibid.*

¹⁴⁴ European Parliament. Parliamentary questions. 1 August 2016. "Subject: Influence of traffic-light food labelling on consumers' choices". Available on: http://www.europarl.europa.eu/doceo/document/E-8-2016-006189_EN.html?redirect. Accessed October 19, 2018.

¹⁴⁵ Food navigator. MEPs raise concerns (again) in relation to traffic labels by David Burrows, 7 September 2016. Available on: <https://www.foodnavigator.com/Article/2016/09/07/MEPs-raise-concerns-again-in-relation-to-traffic-light-labels>. Accessed October 19, 2018.

¹⁴⁶ *Supra* note 136.

Practical study

The research about the ten products and their nutritional and allergen data was conducted using Sainsbury store online grocery shopping services. The result can be seen in the annex No 6.

First, the front of pack labels was present on eight out of ten products. Almost all of the present front of pack labels indicated energy value plus fat, saturates, sugars and salt, one indicated just energy value.

Second, the additional form of expression was chosen for all except one front of pack labels; it was traffic light label. For three products – olive oil, dark chocolate and Greek yogurt - were chosen two food product options – one from Sainsbury's own food chain and another from different producer. For those that were Sainsbury's products additional forms of expression such as traffic light labels were used. In fact, for each product that was produced by the Sainsbury's the traffic light label was used. The Greek yogurt did not bear front of pack label at least not in the picture presented in an online store, however, the nutrition information in product description given in the online store was coloured as for the front of pack label. It was also present on Swiss company Nestle¹⁴⁷ produced chocolate confectionery and Warburtons bread. Warburtons is a British company.¹⁴⁸ Olive oil produced by Fillipo Berio – a Italian company¹⁴⁹ - and fruit yogurt produced by French company Danone¹⁵⁰ as well as Greek yogurt produced by Fage – founded as a Greek company¹⁵¹ – did not bear a traffic light label. UK founded Cadbury¹⁵² also did not bear a traffic light label on its dark chocolate. It could be seen that the labels were rather colourful for the chosen products – green were next to red for sweets such as chocolate and olive oil, cookies had red and orange signs, Greek yogurt and cashew nuts had all three colours present. Orange and green signs, which are the most recommended combinations by authorities for daily consumption, were on cottage cheese and bread. Orange juice presents interesting reality – the same product depending on the reference amount presented two different sets of colour codes. The reference per cartoon, which is 200 ml and is advertised as a one serving, the colours are green and red for sugar amount present. The reference per serving, which is 150 ml of 1 l, the colours are green and amber for sugar. This shows how easily it is to change the colour of label just by adjusting the reference value while the content of the product has not been changed.

Third, the allergen information was provided for seven products, missing olive oil, orange juice and Sainsbury's dark chocolate, which ingredient list did not actually contain any allergen. Allergen ingredients being presented in bold differentiated

¹⁴⁷ Nestle. Available on: <http://www.nestle.com>. Accessed October 19, 2018.

¹⁴⁸ Warburtons. Our history. Available on: <http://www.warburtons.co.uk/corporate/our-history>. Accessed October 19, 2018.

¹⁴⁹ Fillipo Berio. Company info. Available on: <http://global.filippoberio.com/company-info/>. Accessed October 19, 2018.

¹⁵⁰ Danone. Available on: <https://www.danone.com/about-danone.html>. Accessed October 19, 2018.

¹⁵¹ Fage. The Fage story. Available on: <http://international.fage.eu>. Accessed April 25, 2017.

¹⁵² Cadbury. The story. Available on: <https://www.cadbury.co.uk/the-story>. Accessed October 19, 2018.

them among others. For one product the information was conflicting – it stated that for allergens needs to look for ingredients underlined, while the allergens were actually in bold.

Fourth, precautionary labels were added to five products; it was also placed on Sainsbury's dark chocolate that did not contain any allergen. Three products contained allergens yet did not bear any precautionary label. Five out of seven is still more than half of the allergen containing products with additional precautionary labels. The labels stated that product "may contain specific allergen", or "manufactured in the same factory as other allergen products" or "due to manufacturing methods may contain specific allergen".

The online store provides the possibility to buy the food without looking at the full product information as well. Furthermore, the disclaimer was also placed at the end of each products description. It stated that product information was just for better selection process and the ingredient list is liable to changes. It was emphasized that the product information should be always read before consumption and consumer should not trust only the information provided in online store.

To examine the traffic light application by outside and local producers the author also chose to look at the company registered offices. The author concludes the UK applies traffic light label system and its retailers such as Sainsbury's also does it. However, it can be seen that also manufacturers outside the UK such as Nestle applies the traffic light and at the same time not only manufacturers outside the UK but also based in UK such as Cadbury did not apply the traffic light system. Since the store has its own food label it is understandable that it will also be marketed in the first pages of product selection. It might have also led the author to choose the stores foods firstly. Yet the author tried to add diversity by selecting other manufacturers products as well. Nutrition labels form of traffic light can also be manipulated based on the reference amount since that leads to different colours of labels without actually changing the content of product. Still allergen notifications were placed for all the relevant products, however, precautionary labelling again raised doubts – it was placed on more than half of already allergen containing products and even more on the one that did not actually contained any.

3.5. Case of France

France is next to follow the steps of the UK. At the beginning of 2017 France Health Minister has announced the 5-C nutrition labelling system that has similar roots to the UK's traffic light labelling system as an official nutrition label for the France yet still voluntary.¹⁵³ However, it is argued that this system is actually better because it will take into account the full nutrition value of product.¹⁵⁴ To find out whether it is

¹⁵³ Food navigator. 5-C NutriScore to be France's Official nutrition label by Niamh Michail. 16 March 2017. Available on: <https://www.foodnavigator.com/Article/2017/03/16/5-C-NutriScore-to-be-France-s-official-nutrition-label>. Accessed October 19, 2018.

¹⁵⁴ Food navigator. 5-c creator Serge Hercberg on nutrition logos, lobbies and conflict of interest by Niamh Michail. 16 November, 2016. Available on: <http://www.foodnavigator.com/Policy/5-c-creator-Serge-Hercberg-on-nutrition-logos-lobbies-and-conflicts-of-interest>. Accessed October 19, 2018.

true and the potential implications if any the author has chosen to look at the case of France as well.

Allergen labelling

The French authorities in 2015 through Decree No 2015-447 on consumer information on allergens and non-prepacked foodstuffs¹⁵⁵ adopted the rules for the provisions on allergen information for non-prepacked foods in line with Regulation 1169/2011.¹⁵⁶ The legal act provides for amendments to the consumer Code of France. The section 4 regulates non-prepacked food. Subsection 2 sets rules for provision on allergen information. First it states that any use of ingredients listed in Annex II of Regulation 1169/2011¹⁵⁷ as well as presence of those ingredients in the final product even in altered form should be made known to the final consumer and it should be done in line with the rules set in this subsection. The allergen information should be indicated on the food itself or nearby so there is no doubt for the consumer to which product it relates to when the product is presented to the consumer by mass caterers non-prepacked, packed at the place of sale by wish of buyer or prepacked for sale. It further regulates that in the places where the food is to be consumed at the place of premises such as mass caterers' places of cafes and restaurants the allergen information and the way how such information can be obtained should be presented in writing for the consumer at the place where the consumers are admitted and it should be easily accessible to the consumer. The legal act also includes a rule that the provision of allergen information can be not provided for ordering a food in cases if the ordering of the food is completed through the device which allows the consumer before the food consumption to indicate that he will not eat one or more ingredients or substances listed in Annex II of Regulation 1169/2011.¹⁵⁸ In such a case the supplier of the food should keep a document which indicates this refusal by the consumer for three years. The French rules provide that food deliveries should have attached the allergen information.

Yet it has been reported that there are compliance problems with the law. It is stated that about 25% of the non-prepacked food is sold without allergen information. When the information is provided it is given in various forms since the law does not specify how exactly in writing it should be done. The forms of stating that allergen information can be obtained by request were also noted. Another highlighted problem is that about 60% of food business operators put precautionary

¹⁵⁵ Décret n° 2015-447 du 17 avril 2015 relatif à l'information des consommateurs sur les allergènes et les denrées alimentaires non préemballées (Decree No 2015-447 on consumer information on allergens and non-prepacked foodstuffs), adopted: 17 April, 2015, entered into force: 1 July, 2015. Available on: <https://www.legifrance.gouv.fr/affichTexte.do?cidTexte=JORFTEXT000030491684&categorieLien=id>. Accessed October 19, 2018.

¹⁵⁶ *Supra* note 5.

¹⁵⁷ *Ibid.*

¹⁵⁸ *Ibid.*

allergen labelling.¹⁵⁹ ¹⁶⁰ The wide usage of precautionary labels was also observed by practical study discussed below.

It is noticeable advancement that such mandatory allergen presentation is required also for the non-prepacked food in France. It is noted that there are no rules governing precautionary labels of allergens. Additionally, author finds useful the survey completed already so fast after the law entering into force. It provides some results for discussion.

Nutrition labelling

On 15 March 2017 it was announced by the Minister of Health and Solidarity of France that the study which was conducted across France revealed the results of the most effective labelling system being 5-C Nutri-score. The specific labelling system was chosen after the study which compared four nutrition labelling types. The study was conducted across France in 60 stores for a time period of 10 weeks looking at purchase results. It was revealed that consumers really chosen the products with nutrition label. Furthermore, it was shown that the most effective one was Nutri-score and it was also chosen by 60% of consumers with lower income.¹⁶¹ The author observes the positive step by French authorities who have also taken into account the factor about the choice of population with lower incomes. This consumer study also is one of the requirements stated in Regulation 1169/2011¹⁶² Article 35 that needs to be fulfilled in order to adopt additional form of expression for front of pack nutrition labelling system.

The Nutri-score label is grounded on nutrient summarizing system that categorizes food based on five groups of nutritional quality and then indicates the result through colour scale starting by green as the "A" and the healthiest food and ending with red as the "E" and the less healthiest food. The praise on the decision to recommend the nutrition label was also given by the WHO Regional Committee for Europe to the French authorities.¹⁶³ As mentioned above one of the critiques to the

¹⁵⁹ Food navigator. Retailers failing to comply with French allergen law: Watchdog by Niamh Michail. 8 June 2016. Available on: <https://www.foodnavigator.com/Article/2016/06/08/Retailers-failing-to-comply-with-French-allergen-law-Watchdog>. Accessed October 19, 2018.

¹⁶⁰ UFC-QUE CHOISIR. Allergen labelling one year after the new law (Etiquetage des allergenes sur les aliments non emballés : un an après la loi, les professionnels toujours allergiques à leurs obligations). June 2016. Available on: <https://www.quechoisir.org/action-ufc-que-choisir-enquete-sur-les-allergenes-les-professionnels-allergiques-a-la-bonne-information-des-consommateurs-n21579/>. Accessed October 19, 2018.

¹⁶¹ Ministry of Health and Solidarity. Marisol Touraine welcomes the results of studies on the impact of a nutritional logo: interest and the effectiveness of the Nutri-score logo is demonstrated (Marisol Touraine se félicite des résultats des études sur l'impact d'un logo nutritionnel : leur intérêt et l'efficacité du logo Nutri-score sont démontrés) 15 March 2017. Available on: <http://social-sante.gouv.fr/actualites/presse/communiqués-de-presse/article/marisol-touraine-se-felicite-des-resultats-des-etudes-sur-l-impact-d-un-logo>. Accessed October 19, 2018.

¹⁶² *Supra* note 5.

¹⁶³ World Health Organization Europe. France becomes one of the first countries in Region to recommend colour-coded nutrition labelling system. 22 March, 2017. Available on: <http://www.euro.who.int/en/health-topics/disease->

UK's traffic light labelling system was made due to its discrimination of certain food categories. Serge Hercberg who is the creator of the French Nutri-score labelling system has emphasized the added value of it because it does not discriminate specific food categories such as cheeses, for example.¹⁶⁴ Whether it is true will be possible to tell after a while.

It has been reported that products using the label will arrive in stores starting from April in France. The Minister specified that it is a voluntary initiative, however, she also stated her hopes for the snowball effect of the initiative.¹⁶⁵ The author notes the similar government backing of nutrition system in France as can also be seen in the UK in regard their traffic light labelling. Likewise adoption of voluntary nutrition label system is another positive step that can be counted as a serious attempt of France to tackle the obesity problem yet the implications to the common market if any will reveal the success of such system.

Practical study

The research looked at the ten selected products in the online grocery store of Ooshop. The results can be seen in the annex No 3.

First, the front of pack label was placed only on two out of ten products. It was simple energy value repetition. One of the products was from store-based food chain while the other one was not.

Second, for the two products that actually had a front of pack label none of them had any additional forms of expressions.

Third, allergen information was provided for four of seven products that actually contained allergens. For those three the ingredients were named, among which also were the allergens, however, without any forms of differentiation; different segment that would repeat the ingredients that are allergens also could not be found. For those products that distinguished the allergens they were written by capital letters.

Fourth, precautionary labels were placed on four products out of which one did not even distinguished among allergen ingredients. Out of eight products that actually did contained allergens precautionary labels were on four; it still means half of allergen containing products.

It is also possible to order food without reading full information. However, the food information did not contain any disclaimers. The author was also not able to locate the store disclaimer in any clearly visible place. Might be that it is still noted in later purchasing stages, yet disclaimer being out of each products information is different approach as in the other three states.

prevention/nutrition/news/news/2017/03/france-becomes-one-of-the-first-countries-in-region-to-recommend-colour-coded-nutrition-labelling-system. Accessed October 19, 2018.

¹⁶⁴ *Supra* note 154.

¹⁶⁵ The Local. France rolls out colour-coded food labels to help public improve diet. 15 March 2017. Available on: <https://www.thelocal.fr/20170315/colour-coded-groceries-get-green-light-in-france>. Accessed October 19, 2018.

The author concludes that in France the newly adopted 5C front of pack labelling is not yet introduced. Currently there is little front of pack labelling being present and limited to energy value repetition mainly; consequently, no additional forms of expression. However, the distinguishing of allergens among the ingredients is hugely lacking. Even though the precautionary labels are placed in fewer cases than other examined states they are still placed on half of products.

Mass caterers and distance selling

As additional point of research the author looked at menus of four randomly chosen restaurants or cafes in France. The results can be seen in the annex No 7. While one of the restaurant provided for possibility to access menus with allergen information by asking the waiter the rest of them in the best-case scenario indicated the ingredients or gluten free options. Thus a year after the new law entering into force there are also seen discrepancies with compliance. Furthermore, two homepages of home delivery services were also looked at. The results can be seen in the annex No 8. Neither of two options actually differentiated among allergen ingredients. Yet both of them showed the ingredient list. It might be that during later stages of food ordering the customer has a possibility to state that he will not consume the certain food substance and that kind of option would actually be in compliance with allergen notification for non-prepacked food as it is exception provided in law as discussed above.

As previously noted French authorities also carried out the research and it as well showed low compliance level of new allergen indication law. The current example unfortunately still confirms it too.

4. LEGAL EVALUATION AND IMPLICATIONS ON THE COMMON MARKET

As the aim of Regulation 1169/2011¹⁶⁶ is stated to protect consumers interests and health as well as free movement of legally produced and marketed food; it is planned to be achieved through harmonization of food labelling rules. From the teleological point of view the author would like to analyse whether the current developments actually fulfils the stated purposes of the EU legal regulation. In this chapter thus the author will look at the legal evaluation and following implications to the common market of front of pack nutrition labels and allergen labelling under the Regulation 1169/2011¹⁶⁷ also known as food information to consumers regulation.

Front of pack traffic light nutrition labels are legally argued as additional forms of expression under Article 35 of Regulation 1169/2011.¹⁶⁸ For the system to be in line with law it should fulfil certain criteria; it should be grounded on consumer study and should not deceive them, before the systems implementation dialog with stakeholders should be carried out, the aim of the system should be to add to the consumers understanding of the foods nutrition values, system should be founded on research that supports average consumers understanding of the system, system should be based on generally accepted daily reference intakes, it should not discriminate and be objective and the established system should not interfere with free movement of goods. In the further paragraphs the author will elaborate on these criteria.

First, be based on consumer research and do not mislead them. Grounded on judgment in case of *Cassis de Dijon*¹⁶⁹ the products legally put on market in one member state cannot be prohibited from importing in another member state. Thus the traffic light labelled products would become available in other member states beside the UK. If one of the additional forms of expression system will appear in another member state where the consumers will not be introduced with the label it will be confusing for them as well as fragment the common market.¹⁷⁰ One of the researches carried out supported the notion of various front of pack labelling methods actually confusing the consumer.¹⁷¹ Furthermore, it has been noted in the example of orange juice in the UK with traffic light labels that based on reference amount used the colour of traffic light label changes yet the content of the product has not been changed. The author notes that this actually can mislead the consumer. Moreover the amount consumed can be smaller than referenced, which is good for red-labelled products, or greater, which is bad for green-labelled products. If the consumer does not take into account the actual size of package as

¹⁶⁶ *Supra* note 5.

¹⁶⁷ *Ibid.*

¹⁶⁸ *Ibid.*

¹⁶⁹ *Supra* note 12.

¹⁷⁰ *Supra* note 60.

¹⁷¹ Alison K. Draper, Ashley J. Adamson, Sue Clegg, Sally Malam, Malcolm Rigg, and Sue Duncan, "Front-of-pack nutrition labelling: are multiple formats a problem for consumers?" *European Journal of Public Health*, 2013, Vol. 23, Issue 3, pp. 517–521, DOI: 10.1093/eurpub/ckr144.

well as overall nutrition consumption he cannot have balanced diet just by using green products. Just by purchasing the green products and avoiding the red ones consumer food choices will not become healthier; it might actually alter the balanced diet.¹⁷² The label colours are not straightforward and might essentially mislead consumer.

Second, before the adoption of the system the discussion with stakeholders were taken place. The consultation was carried out from May to August during 2012. It brought in about 200 replies from various market participants such as local authorities, non-governmental organizations, health services, manufacturers, retailers, academics, individuals, nutrition service organisations, voluntary and community sectors and also enforcement authorities from the UK. The communications focused on finding out the level of clarity and consistency of front of pack nutrition label that can be reached in line with EU Regulation 1169/2011¹⁷³, possibility to maintain and use the system across the broadest range of food and beverage products as well as considering the results of front of pack labelling forms that consumers admit to be the most useful for them to make healthier diet selections. The key results demonstrate support for constant front of pack nutrition information with further combination of percentage for daily reference intake, colour coding and high, medium or low nutrient indication. Additionally, front of pack label should contain energy value and four more nutrients – sugar, salt, fat and saturates, the data should be presented on per portion basis. The threshold indications for colour coding were studied in light with their application for broader range of food than initially covered. Part of the consumers supported the front of pack nutrition label unified approach while the manufacturers and retailers named technical issues and diverse classifying choices as the obstacles for systems functioning in real life.¹⁷⁴ As it can be observed the implemented traffic light system was achieved after the stakeholder discussion took place. The system included the suggested colour coding with percentage of daily reference intake. However, also can be noted that already in the communication process the concern was expressed from manufacturers and retailers about technical issues that might prevent the implementation in practice.

Third, system should target to add to consumer understanding of the nutrition value of the food. Colour coding influences modest decisions about the food products by the consumers while in fact there are no bad or good products but rather the overall product placement in the person's diet should be evaluated for the health of the consumer.¹⁷⁵ The unhealthy products will be labelled with more likely red and orange signs and the choice for the consumer would be clear while in fact healthy products such as cashew nuts in right amounts might encounter one or more red signs as well thus making the consumer confused. That is because the consumers tend to interpret the label as a whole while officials divide the label and

¹⁷² *Supra* note 60.

¹⁷³ *Supra* note 5.

¹⁷⁴ *Supra* note 138.

¹⁷⁵ Luis González Vaqué, "EU Regulation of Nutrition Labelling: An Irreversible Factor in the Deterioration of the Single Food Market?" *European Food & Feed Law Review*, 2016, Vol. 11, Issue 1, pp. 9-20.

make sense of it by separate parts.¹⁷⁶ Thus it can be argued that the system does not actually add to the consumer understanding of products nutrition value.

Forth, system is based on scientific proof of average consumer understanding of such form of communication. The provision of nutrition levels in food is in reference to 100 grams or 100 ml in certain cases per portion as explained above. They are allowed to differ and the consumer should follow the reference used and place it in their own diet individually. For some products size of 100 grams or 100 ml is not recommended daily intake by nutritionists and the label referencing it for that amount will implicitly will be red; for example olive oil or cashew nuts.¹⁷⁷ That can also be seen in the food product examples of UK store. In order for the traffic light label to serve an average consumer the labelling system should be tailored for an average consumer understanding of health information. As regards the notion of average consumer the Directive 2005/29/EC¹⁷⁸ or also known as unfair commercial practices between businesses and consumers directive might give guidance. In its recital 18 it defines an average consumer as person who is rationally knowledgeable, attentive and cautious, keeping in mind social, cultural and linguistic features.¹⁷⁹ Taking this definition into account and applying it to the traffic light label potential shortage it can be established that average consumer would be cautious as to the label colours and would actually look at the products place in his own diet and the amount consumed thus would not avoid red and orange labels. However, there has been a suggestion that consumer would actually do only brief analysis of the label for products the consumer purchases every day and actually he would not investigate the information thoroughly.¹⁸⁰ In that case if there is provided a traffic light label on the product then it is reasonable to expect that consumer would not actually carry out deeper analysis but rather just check the front of pack label to make the decision. As one of the studies revealed that in fact using red labels on foods helps to decrease consumption of such products while using green labels helps to increase purchase of those.¹⁸¹ From that follows that consumers actually follow the general idea – purchase green and yellow labelled products and avoid red ones.

¹⁷⁶ Emma Tonkina, Samantha B. Meyer, John Coveney, Trevor Webb, Annabelle M. Wilson, "The process of making trust related judgements through interaction with food labelling," *Food Policy*, 2016, Volume 63, pp. 1–11.

¹⁷⁷ *Supra* note 60.

¹⁷⁸ Directive 2005/29/EC of the European Parliament and of the Council of 11 May 2005 concerning unfair business-to-consumer commercial practices in the internal market and amending Council Directive 84/450/EEC, Directives 97/7/EC, 98/27/EC and 2002/65/EC of the European Parliament and of the Council and Regulation (EC) No 2006/2004 of the European Parliament and of the Council ('Unfair Commercial Practices Directive') (Text with EEA relevance), *OJ L* 149, 11.6.2005, pp. 22–39. Available on: <http://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex:32005L0029>. Accessed October 19, 2018.

¹⁷⁹ *Ibid.*

¹⁸⁰ Christian Bohler, "A Thin Line between the Rationalization of Consumer Choices and Overburdening Market Participants - Are the Courts Able to Keep the Balance," *European Food and Feed Law Review*, 2015, Vol. 10, Issue 1, pp. 34-39.

¹⁸¹ Milica Vasiljevic, Rachel Pechey, Theresa M. Marteau, "Making food labels social: The impact of colour of nutritional labels and injunctive norms on perceptions and choice of snack foods," *Appetite*, August 2015, Volume 91, pp. 56-63.

Fifth, label system is based on harmonised reference intakes that are given in Regulation 1169/2011¹⁸² Annex XIII or if they are not provided then on generally accepted intakes. Regulation 1169/2011¹⁸³ in its Annex XIII part B states the applicable reference intakes of adults for chosen nutrients excluding vitamins and minerals. For energy the reference intake is 2000 kcal or 8400 kJ, for total fat 70 g, for saturates 20 g, for carbohydrate 260 g, for sugars 90 g, for protein 50 g and for salt 6 g. Front of pack nutrition label contains indication about fat, saturates, sugar and salt. The percentage reference intakes of the traffic light system is based on 100 g or 100 ml or per portion-based intake and their colour meaning can be observed in annex No 2. As specified in the guidance¹⁸⁴ the percentage reference intakes are given based on data provided in part B of Annex XIII of Regulation 1169/2011¹⁸⁵. Also Article 32 section 4 of Regulation 1169/2011¹⁸⁶ emphasizes that in addition to expression per 100 g or 100 ml nutrient information may be given as percentage reference intakes based on figures given in part B Annex XIII of Regulation 1169/2011¹⁸⁷. Thus the author concludes that this criteria is fulfilled by the traffic light label system.

Sixth, the system is unbiased and fair. The UK's guidance on the application of the traffic light labelling system which is described above, stated that the different colours on the front of pack labelling does not represent claims. Yet it is reasoned that by classifying and assigning colours to the amount of nutrients in the product that can be unhealthy if consumed too much is actually a nutrition claim since it has a task to give an evaluation of the product healthiness to the consumer.¹⁸⁸ This needs to be analysed in the context of the "nutrition labelling" and "nutrition claim" definitions. Both of terms have been described in the EU legal documents as stated above. It can be established that nutrient claim provides some kind of evaluation of the product healthiness while the nutrition label is rather just simple representation of the food value by giving nutrient facts of food as they are. Since this evaluation also propose to the consumer whether the food is good, fair or bad for his health the opinion has been voiced that the traffic light labelling system should be classified rather as a nutrition claim not label. Moreover, the composition of the nutrition declaration is specified in Article 30 of Regulation 1169/2011¹⁸⁹. However, there is no indication of evaluation character given by colour coding. Article 35 of Regulation 1169/2011¹⁹⁰ regulates additional forms of expressions yet they should still be based on the same data from nutrition declaration. Since the traffic lights are authorized under Article 35 as an additional form of expression but it also present evaluative information, which is not part of the Article 30, consequently it is also not part of simple nutrition declaration thus should be rather classified as a nutrition claim.¹⁹¹

¹⁸² *Supra* note 5.

¹⁸³ *Ibid.*

¹⁸⁴ *Supra* note 139.

¹⁸⁵ *Supra* note 5.

¹⁸⁶ *Ibid.*

¹⁸⁷ *Ibid.*

¹⁸⁸ *Supra* note 60.

¹⁸⁹ *Supra* note 5.

¹⁹⁰ *Ibid.*

¹⁹¹ *Supra* note 60.

Consequently, the traffic light system cannot be unbiased since it presents evaluation of the nutrient amount by assigning colour to it.

Seventh, labelling system cannot hinder free movement of trade. Based on the CJEU judgment given in case *Commission of the European Communities v Italian Republic*¹⁹² it can be settled that goods are interpreted as products that have money value and can be a matter of commercial trades.¹⁹³ It can be established that free movement of goods also covers food products. Principle of free movement of goods is grounded on rights embodied in TFEU¹⁹⁴ Article 34-36 under chapter three also known as prohibition of quantitative restrictions between EU member states. Article 34 deals with a ban on quantitative restrictions and all the measures having an equivalent effect imposed on imports. Article 35 likewise bans all the quantitative restrictions and measures having equivalent effect put on exports. However, Article 36 gives some exceptions to the prohibitions mentioned in the previous articles. It states that the exclusions are possible based on public morality, policy or security as well as for the safeguarding of humans, animals or plants health and life also to guard national treasures with artistic, momentous or archaeological value or to protect industrial or commercial property. Nonetheless, the exemptions cannot be used as a way of subjective discrimination or hidden constraint on trade within the Member States in the EU internal market.¹⁹⁵ Thus the threshold to apply exemption for national rule would be high.

It has been distinguished that, in the areas where there is a deeper harmonisation achieved by more specific EU legal act, these general articles on free movement of goods do not apply because more specific rules already endorse them. However, if the area is only partly harmonised then these general rules serves as a precautionary measures.¹⁹⁶ Food labelling area has been harmonized and free movement of goods additionally endorsed as previously mentioned. Yet general rules are still relevant.

Quantitative restrictions are defined as measures that range to complete or limited control in imports or exports of goods as ruled in judgment of case *Riseria Luigi Geddo v Ente Nazionale Risi*.¹⁹⁷ Article 34 deals specifically with non-tariff barriers. Moreover, these restrictions would also apply to hidden measures. It is because it can be based on either legal requirements or administrative practise.¹⁹⁸ In

¹⁹² Judgment in *Commission of the European Communities v Italian Republic*, 10 December 1968, C-7/68, ECLI identifier: ECLI:EU:C:1968:51, p. 429.

¹⁹³ *Ibid.*

¹⁹⁴ *Supra* note 4.

¹⁹⁵ *Ibid.*

¹⁹⁶ European Commission. Enterprise and Industry. Free movement of goods Guide to the application of Treaty provisions governing the free movement of goods by Directorate C, Regulatory Policy, of the Enterprise and Industry DG. 2010. Available on: <http://ec.europa.eu/DocsRoom/documents/104/attachments/1/translations/en/renditions/pdf>. Accessed October 19, 2018.

¹⁹⁷ Judgment in *Riseria Luigi Geddo v Ente Nazionale Risi*, 12 July 1973, C – 2/73, ECLI:EU:C:1973:89, para.7

¹⁹⁸ *Supra* note 196.

the case *Commission of the European Communities v French Republic*¹⁹⁹ it was ruled that also administrative practise that is regular and of overall nature can extent to be recognized as banned restriction on free movements of goods.²⁰⁰ Thus the overall traffic light labelling scheme commonly used in one member state and endorsed by public officials might be considered as hindering free movement of goods if it is regular and of general nature. Measures of equivalent effect were already discussed above and their meaning comes from *Procureur du Roi v Benoît and Gustave Dassonville*.²⁰¹ judgment; in short they are measures that can hinder internal market even if it is only hypothetically or indirectly.

Case *Commission of the European Communities v Hellenic Republic*²⁰² CJEU noted the breach of Article 34 of TFEU²⁰³ in case when the entry into force of national law provision was followed by reduction of quantity in imports from other EU Member States as well as actual import stopping since the new law came in force.²⁰⁴ It has been advocated by the research that consumer consumption has decreased for Italian products, for example, Parma ham once the traffic light label system has been introduced in the UK in 2015.²⁰⁵ If the consumption is falling, then the amount of imports will also decrease creating the similar situation as discussed in the case. Furthermore, in the free movement of goods norm there is no de minimis principle. It means that prohibited restrictions can be recognized even if it is with insignificant economic implication, applicable to small part of geographical location of state or influences little part of imports, exports or traders.²⁰⁶ Accordingly even if the implication to imports covers only certain group of products it would still count as restriction to free movement of goods.

The ECJ has come to conclusion in respect to voluntary food labelling in judgment of case *Joh. Eggers Sohn & Co. v Freie Hansestadt Bremen*²⁰⁷ that the feature of label to be voluntary does not mean that it would not be an unfair trade obstacle if usage of such label is promoting or to be expected to promote an advertising of specific product rivalling the products without such label. The ruling was once again upheld by judgment in case *Commission of the European Communities v Federal Republic of Germany*.²⁰⁸ In one of the studies carried out it was observed that while red-labelled products sales decreased they decreased by

¹⁹⁹ Judgment in *Commission of the European Communities v French Republic*, 9 May 1985, C – 21/84, ECLI:EU:C:1985:184, para. 13.

²⁰⁰ *Ibid.*

²⁰¹ *Supra* note 14.

²⁰² Judgment in *Commission of the European Communities v Hellenic Republic*, 26 October 2006, C – 65/05, ECLI:EU:C:2006:673, para. 28-30.

²⁰³ *Supra* note 4.

²⁰⁴ *Supra* note 202.

²⁰⁵ Fecic. UK Traffic Light – Nomisma Research Summary by Nomisma Research Institute based on data by Nielsen UK. 2 February 2016. Available on: <http://www.fecic.es/img/galeria/crm/file/Dimarts%20Tècnic/2016/Febrer/16-2-16/Anexo2.pdf>. Accessed April 29, 2017.

²⁰⁶ *Supra* note 196.

²⁰⁷ Judgment in *Joh. Eggers Sohn & Co. v Freie Hansestadt Bremen*, 12 October 1978, C – 13/78. ECLI:EU:C:1978:182, para. 26.

²⁰⁸ Judgment in *Commission of the European Communities v Federal Republic of Germany*, 5 November, 2002, C -325/00, ECLI:EU:C:2002:633, para 24.

higher level than sales of the same product without any traffic light.²⁰⁹ It has also been stated that the ability of food labels to alter markets by influencing consumer behaviour cannot be underestimated.²¹⁰ As can be observed from the results of research carrying a traffic light label in certain cases gives a disadvantage because the consumers will purchase less the products with red labels while not necessarily the product in same category without such label.

Here needs to be added that selling arrangements, however would not be covered by the scope of Article 34 and thus not considered as hindering free movement of goods. Taking into account the judgment in case *Sapod Audic v Eco-Emballages SA*.²¹¹ which states that when obligation is not related to product or its packaging and do not form part of regulations to be fulfilled by goods they are not considered selling arrangements.²¹² Rules related to labelling or packaging thus would still be covered by prohibited measures and not selling arrangements.

The traffic light labelling system that is present in the UK is voluntary in nature. However, as described above the UK authorities endorse it. The case *Commission of the European Communities v Ireland*²¹³ decided by the CJEU in 1982 points out that likewise non-binding rules can have an equivalent effect to quantitative restriction that are prohibited by the Article 34 of TFEU²¹⁴. Hence it has been established that Article 34 still applies to measures of non-binding nature. It is so due to their influence to actions of consumers and producers in the specific Member State therefore are presumed contrary to Article 34 of TFEU²¹⁵.²¹⁶ The traffic light labelling system that is implemented on part of products still leave an effect on consumers and manufacturers.

Grounded on the several case law of CJEU related to obstacles on free movement of goods it can be established that the front of pack traffic light labelling system possess doubts as to its legal compliance to Article 34 of TFEU²¹⁷ – quantitative restriction or measures having equivalent effect as the system has a potential limited control over imported goods since amounts of certain imported goods have reduced following the introduction of such system and in line with de minis principle even insignificant impact counts; additionally it has achieved administrative practises level in the UK by most retailers adopting it and official authorities supporting it as well as since voluntary food labels that puts an advantage of the food bearing it against product without it also has proven to be the present case.

²⁰⁹ *Supra* note 205.

²¹⁰ Holle, Martin, Enrico Togni, Arianna Vettorel. "The Compatibility of National Interpretative Nutrition Labelling Schemes with European and International Law," *European Food & Feed Law Review*, 2014, Vol. 9, Issue 3, pp. 148-160.

²¹¹ Judgment in *Sapod Audic v Eco-Emballages SA*, 6 June 2002, C – 159/00, ECLI:EU:C:2002:343, para. 73.

²¹² *Ibid*.

²¹³ Judgment in *Commission of the European Communities v Ireland*, 24 November 1982, C - 249/81, ECLI:EU:C:1982:402, para.28.

²¹⁴ *Supra* note 4.

²¹⁵ *Ibid*.

²¹⁶ *Supra* note 175.

²¹⁷ *Supra* note 4.

In March 2016, a note by delegations of Italy, Cyprus, Greece, Portugal, Romania, Slovenia and Spain was presented at the Agriculture and Fisheries meeting at Council of European Union. The document states that nutrition labelling system violates the Article 35 of Regulation 1169/2011²¹⁸ specifies that any additional forms of expression and presentation should be based on scientific evidence, non-discriminatory, impartial and not hinder free movement of goods. It was pointed out that the healthy eating should be marketed through balanced diet not just by promoting consumption of foods with low levels of nutrients. The concern was also expressed about certain labelling systems discrimination of specific food products such as cheese and jams. It was also highlighted that even though the programme is voluntary the biggest food shops have signed up for using nutrition labelling system.²¹⁹ Additionally, the authority of the UK has endorsed the system as stated above. It impacts the importers by indirectly forcing them to apply the traffic light labelling system on their products otherwise they can find themselves pressed out of the market.

To sum up the opinion stated above it can be concluded that the traffic light label system used in the UK possess serious doubts as its legal evaluation of compliance with Article 35 of Regulation 1169/2011.²²⁰ The main reasons for that are that traffic light front of pack labelling system can mislead the consumer because the labels colours changes depending of the reference amount used. Further on during the stakeholders meeting the retailers and manufacturers already noted possible technical issues that might prevent systems implementation which in case for the importers who would like to apply the system would actually mean additional burden. Next, the system might be perceived as adding to the consumers understanding of the nutrition value at first, however, it has more potential to dislocate the balanced diet because consumers interpret the colours too generally – green-good and red-bad – yet, there are no good or bad products just their placement in consumers diets. The system is not actually intended to average consumer understanding since the consumers does not thoroughly analyse the label rather make quick judgment of colours while healthy products might also carry red signs. Following the system is neither unbiased nor fair since it is argued that traffic light label gives an evaluation judgment based on the nutrient amount present in the food. As well as system is a potential obstacle to free movement of goods since it can be classified as non-binding voluntary practise that is endorsed by the public authorities and according to the previous case law of the CJEU it has been ruled as a quantitative restriction or measure having an equivalent effect on free movements of goods. Based on the following it is argued that the traffic light labelling system might not comply with the rules in place regulating it.

²¹⁸ *Supra* note 5.

²¹⁹ Council of the European Union. Brussels, 29 February 2016 (OR.en) 6585/16, DENLEG 17, SAN 70, AGRI 99. "Hybrid" Nutrition Labelling System recommended in some Member States – Information from the delegations of Italy, Cyprus, Greece, Portugal, Romania, Slovenia and Spain. Available on: <http://data.consilium.europa.eu/doc/document/ST-6585-2016-INIT/en/pdf>. Accessed October 19, 2018.

²²⁰ *Supra* note 5.

It has been implied that additional trigger for food market fragmentation can also come from Article 36 of the Regulation 1169/2011²²¹ which allows in theory any food manufacturer give voluntary food information comprising a nutritional information presentation using a graphic system if the requirements set in Article 36 – should not mislead or confuse the consumer, as well as be based on scientific evidence – are fulfilled.²²² This rule can bring in the food market various different systems of nutrition information representations which at the end will only confuse the consumer and fragment the market and the progress done will be set back to the time before the harmonization. As noted the harmonization of the food labelling was also initiated on the perception that the labelling rules in place at that time was confusing for the consumers since they contained too much information that most of the time was also not understandable.²²³ If each food manufacturer will initiate its own graphic system for nutritional information without higher authority harmonization it might lead to fragmentation of the food market. In this regard as a positive advancement should be noted the initiative by six companies to launch single nutrition label yet the questionable is the format chosen – it is based on traffic light label. Furthermore this already indicates an approaching problem of private companies applying its own systems and fragmenting the market. Also, since several companies will start to use the unified system across the EU member states other companies might feel pressure to apply the particular system as well. That can already be seen in the UK market where the manufacturers who do not apply colour coded labels have been indirectly pressed out of the market.

As can be observed from the above considerations the front of pack nutrition labels in the form the system is detected currently possess various issues that are in confrontation with the aim of Regulation 1169/2011²²⁴ by misleading the consumers and their dietary choices, fragmenting the market as well as hindering free movement of trade.

Allergen labelling for prepacked food is already harmonized in the Regulation 1169/2011²²⁵; as for the non-prepacked food the discretion has been left to the Member States. As can be observed from the study of allergen labelling of ten chosen products in four selected EU member states most of the distance selling stores complies with the requirements exception can be seen in France's online store where in certain cases the allergens were not differentiated among other ingredients. As for the non-prepacked food allergen notification in writing are required only in Latvia and France from the selected member states. Yet, both states show serious enforcement issue lacking. The reasons for that can be a subject of a separate research. Nevertheless, what reassured the ten product study was amount of

²²¹ *Ibid.*

²²² *Supra* note 175.

²²³ European Commission. Health & Consumer Protection Directorate-General. Labelling: competitiveness, consumer information and better regulation for the EU. A DG SANCO Consultative Document. February 2006. Available on: https://ec.europa.eu/food/sites/food/files/safety/docs/labelling-nutrition_better-reg_competitiveness-consumer-info_en.pdf. Accessed October 19, 2018.

²²⁴ *Supra* note 5.

²²⁵ *Ibid.*

precautionary allergen label usage; in Latvia, the Netherlands and the UK they were placed on more than half allergen containing products, in France they were placed on half of allergen containing products. The side effects of over usage of advisory labels have been discussed previously; one of them being reduced food choices for allergic and intolerant consumers as well as allergic consumer ignorance of such labels altogether. The traceability issue which is the main reason for precautionary label usage was already discussed at the EU level in 1997 as mentioned earlier yet until now there is no legal act in place regulating placement of precautionary labels. In the UK there are guidelines developed but they are also only voluntary. However, such initiative might signal that harmonized rules at higher level are necessary. It might go in line with spill over theory of EU integration that harmonization in one area leads to further harmonization of another one.²²⁶ As for now the food precautionary labels is a field without harmonization that might be argued is left for regulation at the Member States level. However, since the allergens are already harmonized at EU level then the precautionary allergen labelling area is somehow partly harmonized by the EU. Furthermore, it might also be reasoned that precautionary label national regulations would actually become barriers to trade thus their regulation should happen at the EU level only.

As can be perceived from the above considerations the issue of precautionary labels in the current system is detected and it is in disagreement with the aim of Regulation 1169/2011²²⁷ by not protecting the health of consumers and any national measures adopted in this field might actually become an obstacle to free movement of trade.

In the field of comparative law theory there is presented a common core concept that emphasizes the thought of the general principles that are familiar in one way or another to developed nations either through law or practise and thus forms the common core.²²⁸ When determining the common core precise questions should be asked. The current study focused on two advancements of food labelling rules adopted by the EU.

The first was nutrition labels and front of pack labels as additional forms of expression. The research asked whether there are developed front of pack labelling systems among the chosen member states and whether it might leave implications to the common market. The second issue was allergen labelling for prepacked and non-prepacked food as well as precautionary allergen labelling. The question proposed was whether chosen member states complies with regulation for prepacked foods, whether there are adopted further national measures for non-prepacked foods, how common are precautionary labels and is there any policy for their usage as well as whether they might leave an implications to the common market.

²²⁶ Wayne Sandholtz and Alec Stone Sweet "Neo-Functionalism and *Supra* notenational Governance" in *the Oxford Handbook of European Union* edited by E. Jones, A. Menon, S. Weatherhill, the UK, Oxford University Press, August 2012, pp. 18.-34.

²²⁷ *Supra* note 5.

²²⁸ Ralf Michaels "The Functional Method of Comparative Law" in the *Oxford Handbook of Comparative Law* edited by M. Reimann, R. Zimmermann, the USA, Oxford University Press, November 2006, pp. 34-380.

When looking at the food labelling laws in the EU and its Member States the author can conclude that there is this common core for all the EU Member States given by the EU itself in regard to food labelling including in fields on nutrition labels and allergen labelling. Nonetheless, based on this theory, there are also part of the freedom that has been left to the Member States discretion. In this case it is further front of pack labelling systems and precautionary labels. If in case of nutrition labelling there could already be seen in several member states such as the UK and France further action then in case of precautionary allergen labelling there are no advance regulations actually except in the UKs guidelines for placing of precautionary labels.

It can be argued that both action and no action fragment the market. In case of action for front of pack nutrition labels the further rules have gone so far that they leave an implication to freedom of movement of goods. In case of no action for precautionary labels by the Member States the mark on common market comes from private initiatives from manufacturers and producers themselves thus fragmenting the market. In contrary any additional national measures would actually risk becoming a trade barrier for free movement of goods.

The current legal framework for both front of pack labelling systems and precautionary allergen labels does not provide for solutions. Nonetheless, the continuous obesity issue and growing number of allergic consumers would ask for developments in the food labelling area. Thus identifying the deliberations the author states that further harmonization in food labelling area most likely is inevitable.

CONCLUSION

The article aimed at providing argumentation for the statement that further developments in the food labelling area are forthcoming. In order to arrive at reasoning the article looked at evolution of law concerning the food labelling area. Then it defined the legal framework for the particular research. Next, article studied the interactions between the current law in the EU and regulations in four EU Member States – Latvia, the Netherlands, France and the UK. Last but not least done a legal evaluation and research on influence to common market.

In the recent decades the laws about food labelling have been updated several times. Contemporary developments like emerging health issues have been reflected in the international organizations such as WHO initiatives. Among the new health issues can be classified an obesity and allergen issues. Their present character has led to influence policy developments in the Commission papers. Policy advancements include relevant allergen representation in food labels and nutrient information to the consumer. Since food is one of the goods that enjoy free movement across the EU common market WTO initiatives has also been taken into account. Likewise, the area is shaped by various case law of CJEU.

The research focuses on analysing the current legal framework of food labelling rules in the EU. The most recent advancement was the introduction of Regulation 1169/2011.²²⁹ Among others two developments introduced by the regulation deserve a particular attention. These issues are: 1) nutrition labelling and 2) allergen labelling. The main purposes of the new legal act are protection of consumers health, harmonization of food information law and free movement of goods. As shown by various statistics named above in the recent year's obesity has emerged as a health issue for Europeans. The WHO has named the positive influence of front of pack nutrition labels as a way to fight obesity. Three front of pack labelling systems have been identified. First, it is basic figures given on scientific evidence, which is a form used in the EU legal act. Second, it is a label used when the products pass certification system, which is a healthy logo like the one in the Netherlands. Third, it is an assessment system labelling, which is the traffic light label scheme used in the UK. All three of the front of pack labelling systems can be seen across the EU.

With the new regulation in force the allergens now have to be stated in the food label. This development is based on increasing allergic consumer population. During the manufacturing process due to shared equipment or facilities cross-contamination might happen. Thus the producers place advisory labels on products. Their usage has now become quite common. It has led to the development of allergic consumers to ignore them. There are four reasons distinguished. First, the labels are so widespread that it is not possible to avoid eating products that have them. Second, the labels are placed to protect manufacturers themselves. Third, when the label wording is less ambiguous, it will not be taken seriously. Fourth, the previous practises of manufacturers have led the consumers to question their seriousness. The study conducted in the UK has revealed that half of the products

²²⁹ *Supra* note 5.

carrying an advisory label do not actually contain any trace of it. This proves the reasons mentioned above, including that manufacturers place the precautionary labels to protect themselves without further analysis. One more development that the new EU Regulation 1169/2011²³⁰ introduced was mandatory allergen labelling for prepacked foods as well as minimum requirements for allergen information of non-prepacked foods. A possibility for the Member States to adopt national measures for the means by which these minimum requirements should be communicated to the consumer was also presented.

The current EU law framework has made the obligatory nutrition declaration common to all the EU Member States. However, it also gave the opportunity for Member States to introduce additional forms of expression in front of pack labels that would contain only energy value or energy value plus fat, saturates, sugar and salt.

The study involved a comparison of four EU Member States. Latvia was chosen due to possibility to more closely observe the current situation in several analysis points. The UK was chosen due to the front of pack traffic light labelling system that it has implemented. The Netherlands was selected due to first signs of similar steps taken by the UK. France was taken due to the most recent development that has introduced the new front of pack labelling system 5C. An empirical analysis was conducted to understand the quality of front of pack label usage as such, as well as present front of pack labelling schemes if any. Furthermore, it was studied whether allergen ingredients are distinguished in the list of ingredients as well as whether there is placed any precautionary label.

The first analysis point revealed that the UK and the Netherlands use front of pack labelling quite extensively. In Latvia and France the front of pack labels were observed rarely and they were information repetition based on scientific evidence.

The second analysis topic discovered that the UK has implemented front of pack labelling that also give assessment information while the Netherlands uses quality labels which can be put on food once the set requirements are met. The colourful labels in the specific store in the Netherlands were the initial reason to choose this state for study. However, during the analysis it was revealed that colourful labels for sugar amount were a private initiative taken by the owner of the store. Nevertheless, the product study showed still a high number of products bearing the healthy logo. As reported in the research the first healthy logo that was recognized at the EU level is now being cancelled. The main reason is the consumer confusion because it was not possible for them to distinguish between unhealthy product without the logo and products, which did not participate in the programme. Now the initiative to provide nutrition information to help compare the product with similar ones via app has been announced. This requires that the consumer has a smart phone and it might be discriminatory. From situation analysis can be concluded that primary a voluntary labelling system creates confusion for the consumers and secondary if an additional form of presentation involves electronic means it can create discrimination, which is contrary to Article 35 section 1 part (f)

²³⁰ *Ibid.*

of the Regulation 1169/2011²³¹. This suggests that voluntary additional forms of expression should also be integrated in order to avoid consumer misperception. The front of pack labelling system present in the UK is known as traffic light labelling. The label provides information to consumers based on whether the nutrient amount in the products is high, medium or low through colours red, yellow or green. Founded on the nutrient amount in the product and the threshold against daily reference intakes it reaches label has assigned colour. The label will contain information about energy value, fat, saturates, sugar and salt. The system is positioned as voluntary. However, the authorities endorse it. Moreover the majority of retailers have also adopted it. That has led to various importers claiming that the system is hindering free movement of goods as well as not actually helping the consumers.

The third analysis point discussed whether the allergen ingredients were distinguished from other ingredients. The study revealed that ingredient list distinguishes allergens in Latvia, the Netherlands and the UK while France had some exceptions.

The fourth topic of analysis looked at usage rates of precautionary labels. It revealed that in Latvia, the Netherlands and the UK on more than half of allergen containing products also precautionary labels are placed; in France on half of the products containing allergens were also found precautionary labels. It was also found that even on products without any allergens precautionary labels were placed. Currently only in the UK there are guidelines for placement of advisory labelling. There are international initiatives yet they were not studied in this research that focused precisely on the EU rules. The side effect of the common usage of precautionary labels is the developed consumer attitude towards them – they tend to ignore them. Furthermore, unnecessary placement of advisory labels reduces the available food choices for allergic consumers.

The study also looked at implemented national measures, if any, for allergen representation for non-prepacked food. While in the UK and the Netherlands gives an opportunity for the mass caterer to decide how to communicate allergens to the consumer in Latvia and France the governments have chosen to oblige mass caterers to present this information in writing. Thus the research took examples of four cafeteria or restaurant menus available online of each country to see whether the allergens are specified in them as well as also looked at two food distance selling home delivery websites in each of the country to observe the indication of allergens. The overall results show the compliance problems in Latvia and also France. As noted the study to assess the compliance was carried out in France a year after the new law implementation and it highlighted fulfilment issues as well. Why there are such problems would be a reason for further study not covered by this research.

Next the research looked at legal evaluation and implications to common market from nutrition and allergen labelling. As revealed by the state regulations studies, the most noticeable front of pack system present in the EU is the traffic light labelling system adopted in the UK. The paper analysed the traffic light label system

²³¹ *Ibid.*

present in the UK in its set legal framework – Article 35 of Regulation 1169/2011.²³² The analysis of current situation revealed that the current system might be confusing and misleading for the consumers – the label colours changes based on the reference amount used, it also is disputable whether it is targeted for average consumer understanding since it is based on notion that to achieve a healthy diet red products should be avoided while in fact, certain healthy products will contain red signs which as proven by the researches the consumers avoid due to perception green label - good and red label – bad product for health. The more important notion is that there are no good or bad products rather their placement in the person’s diet. The traffic light system proposes more simplistic decision making for the consumer yet the consumer will not carry out more thorough analysis of the labels if he has been presented simplified version with an overall assessment that is the colours and their meanings. The system also should add to consumer understanding of the nutritional value of the food yet, for example, the cashew nuts with red signs would be avoided and good nutrients that they contain will be missing from consumers’ diet. It has been argued that the consumers will interpret the label as a whole, thus again leading to conclusion that labels that bear red and green signs together such as olive oil will confuse the consumer. The system should be unbiased and fair yet it presents the consumer with nutrient assessment and it is argued that it should rather be classified as a health claim. Nutrient assessment for certain product groups will receive mostly red signs such as cheeses. It has been concluded that product groups bearing mostly red signs have experienced selling rate drops as well. That leads to the final requirement that the system should fulfil in order to be in line with the law and it is that it cannot hinder free movement of goods. However, the analysis of the current situation and CJEU case law led to conclusion that it actually might restrict trade in the common market as the system is categorized as non-binding voluntary practise yet recommended by the government and in line with the preceding case law of the CJEU it might actually mean it is a quantitative restriction or measure having an equivalent effect.

A private initiative taken by six major companies in March 2017 that announced the introduction of colour coded nutrition declarations across the European market already shows that the UK’s example has left an implication and the front of pack labels will become more and more popular. In order to address the various issues connected to their legal evaluation the EU will have to give an assessment and its own opinion. No matter the opinion given it is believed to leave a mark for the framework of the current system.

The aim of the Regulation 1169/2011²³³ is to protect the health of the consumers and while the mandatory allergen indication is in line with this aim the parallel development of increased usage of precautionary labels actually impede this purpose. Any initiatives in the form of binding law taken by the Member States in order to regulate this field would most likely become an obstacle to free movement of goods. Moreover the traceability issue that is the main reason for precautionary labelling was already discussed in the EU in 1997 yet still the harmonization of

²³² *Ibid.*

²³³ *Ibid.*

advisory labels has not happened. Nevertheless, since current analysis reveals the issue in field, it is argued that further law development in this food labelling area would be necessary.

The author chooses the teleological viewpoint to analyse whether the current legal framework for nutrition and allergen labelling serves the main purpose of the regulation. As noted the purposes are to protect consumers' health, harmonize food information to consumers and ensure the free movement of goods. As discussed above the contemporary developments like various front of pack labelling schemes or increased usage of precautionary labels show signs of compromising consumers' health. The EU adopted legal act serves as a common ground for the food labelling area in all the EU Member States. Through the rules set in the regulation the nutrition and allergen labelling has been harmonized in the internal market. Nevertheless, the EU has given the discretion to the Member States to decide the additional forms of presentation for front of pack labels and also the EU has not laid down rules in regard to precautionary allergen labels. France and the UK have used the opportunity and they have adopted their own labelling systems. Yet now the traffic light label system is alleged to restrict free movement of goods. Whereas precautionary allergen labels are still unregulated field. There are the guidelines developed in the UK and private initiatives by manufacturers, however, any mandatory rules at national level would risk becoming an obstacle to free movement of goods. Potential fragmentations of the market follow from both areas. Thus the author argues that that the purposes of the regulation have been served partially. Moreover the current legal framework does not answer the question how to manage additional forms of presentation or precautionary allergen label placement – two still relevant difficulties. Therefore the author concludes that further development in food labelling areas is to be expected.

ANNEXES

Annex No 1. Evolution of food labelling rules

<i>Year (entry into force)</i>	<i>Act</i>	<i>No</i>	<i>Evolution</i>
1978	Directive	79/112/EEC	Recognizes the rules of food labelling, representation and advertising
1984	Directive	85/7/EEC	Changes the rules for the involvement of the Standing Committee for Foodstuffs by amending Directive 79/112/EEC
1986	Directive	86/197/EEC	Amends the alcohol strength labelling rules by amending Directive 79/112/EEC
1989	Directive	89/395/EEC	Makes the rules applicable to mass caterers among other changes by amending Directive 79/112/EEC
1990	Directive	90/496/EEC	Regulates the rules on nutrition labelling for food
1991	Directive	91/72/EEC	Rules for designation of lists of flavouring by amending Directive 79/112/EEC
1994	Directive	93/102/EEC	Repeals the Annexes by amending Directive 79/112/EEC
1997	Directive	97/4/EC	Amends the rules of the name of the food by amending Directive 79/112/EEC
1999	Directive	1999/10/EC	Provides for derogations of Article 7 of Directive 79/112/EEC
2000	Directive	2000/13/EC	Consolidates the previous amendments to the Directive 79/112/EEC
2001	Directive	2001/101/EC	Revises the rules for definition of meat of the Directive 2000/13/EC
2002	Directive	2002/67/EC	Modifies the labelling rules as regard caffeine and quinine of the Directive 2000/13/EC
2002	Regulation	178/2002	Lays down the general principles and requirements of food law; establishes EFSA
2003	Regulation	1829/2003	Sets the rules of labelling for genetically modified food

2003	Regulation	1830/2003	Labelling issues of genetically modified organisms and their traceability
2003	Directive	2003/89/EC	Adjusts the rules for indication of ingredients in the food especially the allergens of the Directive 2000/13/EC
2004	Regulation	853/2004	Addresses the hygiene rules for foodstuff including its labelling
2004	Regulation	882/2004	Adopts the rules regarding the official controls of compliance checks including the food labelling
2005	Directive	2005/26/EC	Adds allergen labelling requirements to Directive 2000/13/EC
2007	Regulation	1924/2006	The main legislative act in a field of nutrition and health claims
2006	Directive	2006/142/EC	Improves the rules of labelling by list of ingredients that must be presented in the label by amending Directive 2000/13/EC
2007	Directive	2007/68/EC	Amends Annex IIIa of the Directive 2000/13/EC
2009	Regulation	1332/2008	The labelling requirements for food enzymes
2009	Regulation	1333/2008	The labelling necessities for food additives
2009	Regulation	1334/2008	The labelling rules for food flavourings
2011	Regulation	1169/2011	Food information for consumers

Annex No 2

Extract from UK Government, Department of Health, "Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets," 19 June, 2013, pages 19-20. Available on: <https://www.gov.uk/government/publications/front-of-pack-nutrition-labelling-guidance>. Accessed October 19, 2018.

Evaluation for food of 100 g

Text	LOW ⁸	MEDIUM	HIGH	
Colour code	Green	Amber	Red	
			>25% of RIs	>30% of RIs
Fat	≤ 3.0g/100g	> 3.0g to ≤ 17.5g/100g	> 17.5g/100g	> 21g/portion
Saturates	≤ 1.5g/100g	> 1.5g to ≤ 5.0g/100g	> 5.0g/100g	> 6.0g/portion
(Total) Sugars	≤ 5.0g/100g	> 5.0g to ≤ 22.5g /100g	> 22.5g/100g	> 27g/portion
Salt	≤ 0.3g/100g	> 0.3g to ≤ 1.5g/100g	>1.5g/100g	>1.8g/portion

Portion size applies if it is greater than 100g.

Evaluation for food of 100 ml

Text	LOW ⁹	MEDIUM	HIGH	
Colour code	Green	Amber	Red	
			>12.5% of RIs	>15% of RIs
Fat	≤ 1.5g/100ml	> 1.5g to ≤ 8.75g/100ml	> 8.75g/100ml	>10.5g/portion
Saturates	≤ 0.75g/100ml	> 0.75g to ≤ 2.5g/100ml	> 2.5g/100ml	> 3g/portion
(Total) Sugars	≤ 2.5g/100ml	> 2.5g to ≤ 11.25g/100ml	> 11.25g/100ml	> 13.5g/portion
Salt	≤ 0.3g/100ml	>0.3g to ≤0.75g/100ml	> 0.75g/100ml	> 0.9g/portion

Portion size applies if it is greater than 150ml.

Annex No 3. France

Information obtained in distance selling grocery store "OoShop" at www.ooshop.com/courses-en-ligne/Home.aspx in France. All the photos taken on 24 April, 2017. The original language is French, translation done to English and can be seen in discussions in the article.

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Cashew nuts	<p>NOIX DE CAJOU - CARREFOUR</p>  <p>Analyse nutritionnelle pour 100g</p> <p>Valeur énergétique : 607 kcal Glucides : 28 g Lipides : 47 g Protides : 18 g</p> <p>Informations</p> <p>Les noix de cajou, dites noix de Bombay proviennent du sud de l'Inde, elles sont soigneusement sélectionnées au calibre W240, c'est à dire que l'on trouve environ 240 graines pour 1 livre (453.5g).</p> <p>La consommation de graines salées est déconseillée aux jeunes enfants en raison des risques d'étouffement.</p> <p>Conservation</p> <p>Après ouverture du sachet, les graines doivent être consommées dans les 48 h pour bénéficier de toute leur saveur.</p> <p>Ingrédients</p> <p>Noix de cajou (origine Inde)-huile végétale (arachide)-sel.</p>	X	X	X	X

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Olive oil	<p data-bbox="443 367 900 389">HUILE D'OLIVE VIERGE EXTRA BIO - CARAPELLI</p>  <p data-bbox="443 835 555 857">Informations</p> <p data-bbox="443 898 1107 943">Huile d'Olive Vierge Extra issue de l'agriculture Biologique Obtenue d'huiles d'olive de l'Union Européenne et hors Union Européenne.</p> <p data-bbox="443 960 1126 1028">Carapelli célèbre l'art et la simplicité de l'huile d'olive. Issue exclusivement d'oliveraies biologiques, notre huile d'olive vierge extra est produite dans le respect de notre héritage.</p> <p data-bbox="443 1046 1086 1149">Notre engagement qualité et transparence : Nous avons une longue tradition dans la production d'huiles d'olives de qualité supérieure. C'est pourquoi nos caractéristiques physico-chimiques sont plus strictes que celles imposées par la législation.</p> <p data-bbox="443 1167 1002 1189">Pour plus d'informations, veuillez consulter www.extravirginquality.com</p> <p data-bbox="443 1227 624 1249">Conseils d'utilisation</p> <p data-bbox="443 1290 1121 1357">Huile d'olive vierge extra. Huile d'olive de catégorie supérieure obtenue directement des olives et uniquement par des procédés mécaniques.</p> <p data-bbox="443 1395 563 1417">Conservation</p> <p data-bbox="443 1458 735 1498">A conserver dans un lieu frais et sec. A l'abri de la lumière et de la chaleur.</p> <p data-bbox="443 1536 735 1559">Valeurs nutritionnelles pour 100ml</p> <p data-bbox="443 1599 671 1744">Energie : 3382 KJ / 823 Kcal Matières grasses : 91g dont saturés : 14g Glucides : 0g dont sucres : 0g Protéines : 0g Sel : 0g</p>	X	X	X	X

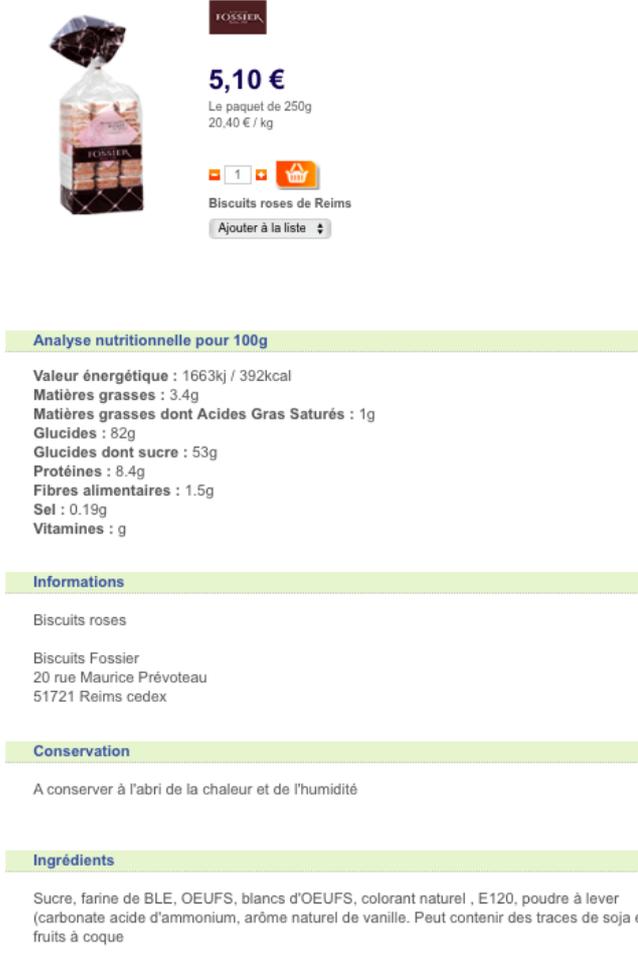
Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Orange juice	<p data-bbox="443 387 788 412">100% PUR JUS D'ORANGE - JOKER</p> <div data-bbox="464 456 571 696"> </div> <div data-bbox="651 456 719 479"> </div> <div data-bbox="651 517 735 551"> <p>3,70 €</p> </div> <div data-bbox="651 555 746 600"> <p>La brique, 2L 1,85 € / litre</p> </div> <div data-bbox="651 636 783 667"> </div> <div data-bbox="651 669 831 694"> <p>100% Pur Jus d'Orange</p> </div> <div data-bbox="651 698 791 723"> <p>Ajouter à la liste</p> </div> <p data-bbox="443 831 743 855">Analyse nutritionnelle pour 100mL</p> <p data-bbox="443 875 683 898">Valeur énergétique : 42 kcal</p> <p data-bbox="443 898 579 920">Glucides : 0,7 g</p> <p data-bbox="443 920 568 943">Lipides : 0,1 g</p> <p data-bbox="443 943 579 965">Protéines : 10 g</p> <p data-bbox="443 1003 555 1025">Informations</p> <p data-bbox="443 1048 1145 1093">100% pur jus d'orange sans sucre ajouté* à teneur garantie en vitamines C, E, B3, B5, pro-A, B6, B1, B9, B8.</p> <p data-bbox="443 1115 1161 1205">Tous nos jus sont issus de fruits de qualité, frais et mûris au soleil. Nos fruits sont cueillis à point, et pressés dès leur récolte, pour restituer au mieux leur saveur et leurs qualités nutritionnelles. Les jus Joker sont flash pasteurisés pour préserver au mieux les bienfaits et les qualités gustatives des fruits.</p> <p data-bbox="443 1227 1161 1294">Les jus Joker sont fabriqués sans adjonction de sucre, et n'apportent donc que les calories du fruit d'origine. 1 verre de 100% pur jus Joker vous aide à couvrir vos besoins quotidiens en 5 fruits et légumes.</p> <p data-bbox="443 1317 978 1339">Une alimentation équilibrée et variée est importante pour la santé.</p> <p data-bbox="443 1361 735 1384">* conformément à la réglementation</p> <p data-bbox="443 1417 627 1440">Conseils d'utilisation</p> <p data-bbox="443 1462 659 1485">Bien agiter avant de servir.</p> <p data-bbox="443 1547 563 1570">Conservation</p> <p data-bbox="443 1592 994 1615">A conserver au frais 5 jours après ouverture, refermer après usage.</p> <p data-bbox="443 1675 547 1697">Ingrédients</p> <p data-bbox="443 1720 994 1742">Pur jus d'orange, vitamines C-E-B3-B5, bêta carotène B6-B1-B9-B8</p>	X	X	X	X

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Cottage cheese	<p>COTTAGE CHEESE DE JOCKEY - DANONE</p>  <p>4,17 € Les 2 pots de 200g 10,43 € / kg</p> <p>11j Carrefour Ooshop vous garantit 11j min. pour consommer ce produit à compter de votre date de livraison.</p> <p>1</p> <p>Ajouter à la liste</p> <p>Origine : ALLEMAGNE</p> <p>Analyse nutritionnelle pour 100g</p> <p>Valeur énergétique : 382 Kj / 91 kcal Matières grasses : 3,9 g Matières grasses dont Acides Gras Saturés : 2,5 g Glucides : 2,3 g Glucides dont sucre : 2,2 g Protéines : 11,7 g Fibres Alimentaires : Sel : 0,5 g Vitamines :</p> <p>Informations</p> <p>Spécialité de fromage blanc nature. Une délicieuse recette anglaise pour les amateurs de fromage frais. Une spécialité nature qui peut accompagner des mets salés ou sucrés, grâce à son goût nature et sa texture légère.</p> <p>Service consommateurs : D.P.F.F 93589 SAINT OUEN CEDEX</p> <p>Conseils d'utilisation</p> <p>A tartiner ou à cuisiner, dans vos recettes sucrées ou salées, il est idéal pour donner vie à vos idées créatives.</p> <p>Conservation</p> <p>A conserver à +6° max.</p> <p>Ingrédients</p> <p>LAIT écrémé pasteurisé, crème pasteurisée, (LAIT), sel (0,8%), ferments lactiques (LAIT).</p>	X	X	✓	X

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Greek yogurt	<p>YAOURT BRASSÉ NATURE À LA GRECQUE - CARREFOUR</p>   <p>1,61 € les 4 pots de 150g 2,68 € / kg</p> <p>11j Carrefour Ooshop vous garantit 11j min. pour consommer ce produit à compter de votre date de livraison.</p> <p>1 </p> <p>Yaourt brassé nature à la grecque</p> <p><input type="button" value="Ajouter à la liste"/></p> <p>Origine : FRANCE</p> <p>Analyse nutritionnelle pour 100g</p> <p>Valeur énergétique : 116 kcal Glucides : 4,7 g Lipides : 9,2 g Protides : 3,7 g</p> <p>Informations</p> <p>Yaourt brassé nature au lait entier et à la crème.</p> <p>Conseils d'utilisation</p> <p>Excellent nature ou sucré, ce yaourt à la grecque peut aussi être utilisé pour vos préparations salées.</p> <p>Conservation</p> <p>A conserver entre 0°C et +6°C maximum.</p> <p>Ingrédients</p> <p>Lait entier 81%-crème 15,4%-lactose et protéines de lait-ferments lactiques.</p>	X	X	X	X

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Fruit yogurt	<p>YAOURT AUX FRUITS MIXÉS SANS MORCEAUX - CARREFOUR</p>  <p>Analyse Nutritionnelle pour 100g</p> <p>Valeur énergétique : 302 kJ / 53 kcal Matières grasses : 2,1 g Matières grasses dont Acides Gras Saturés : 1,4 g Glucides : 14,2 g Glucides dont sucre : 13,2 g Protéines : 4,2 g Fibres alimentaires : traces Sel : 0,15 g Vitamines : 0g</p> <p>Informations</p> <p>Yaourts brassées sucrés à la pulpe de fruits et aromatisés.</p> <p>Service consommateurs Carrefour : TSA 91431 91343 MASSY Cédex</p> <p>Conservation</p> <p>A conserver entre 0°C et +7°C.</p> <p>Ingrédients</p> <p>LAIT partiellement écrémé à 25g/l, sucre 7,1%, pulpe de fruits 5% (citron, pêche, abricot, framboise, fraise, cerise), sirop de glucose-fructose de BLE, protéines de LAIT, amidon transformé de tapioca, arômes, épaississants : pectine, gomme guar et gomme xanthane, colorants : antioxygènes, carmin, bêta-carotène, extrait de paprika, ferments lactiques.</p>	X	X	✓	X

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Bread	<p>PAIN AU SEIGLE - CARREFOUR</p>  <p>2,01 € Les 8 tranches, 500g 4,02 € / kg</p> <p>Carrefour Ooshop vous garantit 7j min. pour consommer ce produit à compter de votre date de livraison.</p> <p>Pain au Seigle</p> <p>Ajouter à la liste</p> <p>Origine : ALLEMAGNE</p> <p>Analyse nutritionnelle pour 100g</p> <p>Valeur énergétique : 221 kcal Glucides : 42 g Lipides : 1,2 g Protéines : 7,1 g</p> <p>Conseils d'utilisation</p> <p>Idéal pour accompagner tous vos repas.</p> <p>Conservation</p> <p>A conserver à l'abri de la chaleur et de l'humidité. Bien refermer le sachet après ouverture.</p> <p>Ingrédients</p> <p>Farine de blé 38%, eau, levain de seigle (farine de seigle 11%, eau), mono- et diglycérides d'acides gras, gluten de blé, farine complète d'avoine. Peut contenir des traces de graines de sésame.</p>	✓	✗	✗	✓

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Cookies	<p data-bbox="416 376 1054 405">BISCUITS ROSES DE REIMS - FOSSIER</p>  <p data-bbox="416 757 1054 786">Analyse nutritionnelle pour 100g</p> <p data-bbox="416 792 1054 965"> Valeur énergétique : 1663kj / 392kcal Matières grasses : 3.4g Matières grasses dont Acides Gras Saturés : 1g Glucides : 82g Glucides dont sucre : 53g Protéines : 8.4g Fibres alimentaires : 1.5g Sel : 0.19g Vitamines : g </p> <p data-bbox="416 999 1054 1028">Informations</p> <p data-bbox="416 1034 1054 1133"> Biscuits roses Biscuits Fossier 20 rue Maurice PrévotEAU 51721 Reims cedex </p> <p data-bbox="416 1167 1054 1196">Conservation</p> <p data-bbox="416 1202 1054 1232">A conserver à l'abri de la chaleur et de l'humidité</p> <p data-bbox="416 1265 1054 1294">Ingrédients</p> <p data-bbox="416 1301 1054 1386"> Sucre, farine de BLE, OEUFS, blancs d'OEUFS, colorant naturel, E120, poudre à lever (carbonate acide d'ammonium, arôme naturel de vanille). Peut contenir des traces de soja et fruits à coque </p>	X	X	✓	✓

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Dark chocolate	<p>CHOCOLAT NOIR 72% - VILLARS</p>  <p>Analyse nutritionnelle pour 100g</p> <p>Valeur énergétique : 2300 kJ / 550 kcal Matières grasses : < 44 g Matières grasses dont Acides Gras Saturés : 27g Glucides : 31 g Glucides dont sucre : 26 g Protéines : 7 g Fibres alimentaires : 14 g Sel : 0.015g</p> <p>Informations</p> <p>Chocolat Noir 72%: Fabriqué en Suisse par : Villars maitre chocolatier S.A-1701 Fribourg-suisse- www.Villars.com- Importé enUE(hors Espagne et Portugale) par : VMC France -5, Place Pincourt-42120 Le Cateau- France.</p> <p>Conservation</p> <p>à conserver au frais et au sec</p> <p>Ingrédients</p> <p>Ingrédients: Pâte de Cacao, sucre, beurre de cacao, émulsifiant(lécithinede SOJA) arôme naturel de vanille. Cacao: 72% minimum dans le chocolat.Peut contenir des traces de Lait, NOISETTE, AMANDE, NOIX, NOIX DE PEcan,NOIX DE CAJOU, PISTACHE,OEUF et GLUTEN</p>	X	X	✓	✓

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Chocolate confectionery	<p>BONBONS MIGNONNETTES CHOCOLAT NOIR CÔTE D'OR</p>  <p>ANALYSE NUTRITIONNELLE</p> <p>Valeurs nutritionnelles moyennes pour 100g Valeur énergétique : 2305kJ / 555kcal Matières grasses : 36,0g Matières grasses dont Acides Gras Saturés : 22g Glucides : 47,0g Glucides dont sucre : 43,5g Protéines : 8,9g Sel : 0,0g Fibres alimentaires : 8,9g</p> <p>INGREDIENTS</p> <p>Chocolat extra noir. Sucre, pâte de cacao, beurre de cacao, cacao en poudre fortement dégraissé, émulsifiant (lécithine de SOJA), arôme, poudre de LAIT entier. Peut contenir FRUITS A COQUE.</p> <p>INFORMATIONS CONSOMMATEURS</p> <p>Mondelez France SAS BP100 92146 Clamart Cedex Côte d'Or à votre écoute au 09 69 39 79 79 (appel non surtaxé)</p> <p>INFORMATIONS PRODUIT</p> <p>A conserver à l'abri de la chaleur et de l'humidité.</p> <p>CONSEILS D'UTILISATION / AVERTISSEMENT</p> <p>Cacao : 54% minimum.</p>	✓	✗	✓	✓
Store disclaimer	N/A				

Annex No 4. The Netherlands

Information obtained in distance selling grocery store "Allerhande" at <https://www.ah.nl/producten> in the Netherlands. All the photos taken on 24 April, 2017. The original language is Dutch, translation done to English and can be seen in discussions in the article.

* "HO" – healthy logo

"+" - additional "no allergen" symbol

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice																						
Cashew nuts	 <p>Ingrediënten Ingrediënten: CASHEWNOOT, plantaardige olie (zonnebloem, palm), zout. Allergie-informatie: bevat cashewnoot. Gemaakt in een bedrijf waar ook pinda's en andere noten worden verwerkt.</p> <p>Allergie-informatie Bevat: cashewnoot, noten.</p> <p>Voedingswaarden Deze waarden gelden voor het onbereide product.</p> <table border="1" data-bbox="778 981 1066 1189"> <thead> <tr> <th></th> <th>Per 100 Gram.</th> </tr> </thead> <tbody> <tr> <td>Energie</td> <td>2575 kJ (620 kcal)</td> </tr> <tr> <td>Vet</td> <td>49 g</td> </tr> <tr> <td>Waarvan verzadigd</td> <td>10 g</td> </tr> <tr> <td>Waarvan enkelvoudig onverzadigd</td> <td>30 g</td> </tr> <tr> <td>Waarvan meervoudig onverzadigd</td> <td>9 g</td> </tr> <tr> <td>Koolhydraten</td> <td>29 g</td> </tr> <tr> <td>Waarvan suikers</td> <td>9 g</td> </tr> <tr> <td>Voedingvezel</td> <td>3 g</td> </tr> <tr> <td>Eiwitten</td> <td>18 g</td> </tr> <tr> <td>Zout</td> <td>0.7 g</td> </tr> </tbody> </table>		Per 100 Gram.	Energie	2575 kJ (620 kcal)	Vet	49 g	Waarvan verzadigd	10 g	Waarvan enkelvoudig onverzadigd	30 g	Waarvan meervoudig onverzadigd	9 g	Koolhydraten	29 g	Waarvan suikers	9 g	Voedingvezel	3 g	Eiwitten	18 g	Zout	0.7 g	x	x r e d / g r e e n	✓	✓
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Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice																						
Fruit yogurt	 <p>Ingrediënten Ingrediënten: Magere YOGHURT, 7,5% fruit (2% aardbei, 1,6% rode bes, 1,5% rode bosbes, 1,2% kers, 1,2% bosbes), suiker, maïzetmeel, citroensap, natuurlijk aroma. Allergie-informatie: bevat noemelkeiwit en lactose.</p> <p>Allergie-informatie Bevat: lactose, melk.</p> <p>Voedingswaarden Deze waarden gelden voor het onbereide product.</p> <table border="1"> <thead> <tr> <th></th> <th>Per 100 Gram.</th> </tr> </thead> <tbody> <tr> <td>Energie</td> <td>323 kJ (76 kcal)</td> </tr> <tr> <td>Vet</td> <td>0 g</td> </tr> <tr> <td>Waarvan verzadigd</td> <td>0 g</td> </tr> <tr> <td>Koolhydraten</td> <td>8 g</td> </tr> <tr> <td>Waarvan suikers</td> <td>7,8 g</td> </tr> <tr> <td>Eiwitten</td> <td>9,4 g</td> </tr> <tr> <td>Zout</td> <td>0,08 g</td> </tr> </tbody> </table>		Per 100 Gram.	Energie	323 kJ (76 kcal)	Vet	0 g	Waarvan verzadigd	0 g	Koolhydraten	8 g	Waarvan suikers	7,8 g	Eiwitten	9,4 g	Zout	0,08 g	X	X	✓	X						
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Bread	 <p>Omschrijving</p> <ul style="list-style-type: none"> Volkorenbrood met sesamzaad. Heel Rijk aan vezels. Ca. 22 sneetjes (ca. 35 g). <p>Inhoud en gewicht - porties!</p> <p>Ingrediënten Ingrediënten: VolkorenTARWEMEEL, water, bakkersgist, 2,5% SESAMZAAD, TARWEGLUTEN, moutmeel (GERST, TARWEL), geroosterd zout. Allergie-informatie: bevat tarwegluten, sesam, gerstgluten. Gemaakt in een bedrijf waar ook noten worden verwerkt.</p> <p>Allergie-informatie Bevat: gerst, tarwe, glutenbevattende granen, sesamzaad. Kan bevatten: noten.</p> <p>Voedingswaarden Deze waarden gelden voor het onbereide product.</p> <table border="1"> <thead> <tr> <th></th> <th>Per 100 Gram.</th> </tr> </thead> <tbody> <tr> <td>Energie</td> <td>995 kJ (235 kcal)</td> </tr> <tr> <td>Vet</td> <td>2,5 g</td> </tr> <tr> <td>Waarvan verzadigd</td> <td>0,4 g</td> </tr> <tr> <td>Waarvan enkelvoudig onverzadigd</td> <td>0,7 g</td> </tr> <tr> <td>Waarvan meenvoudig onverzadigd</td> <td>1 g</td> </tr> <tr> <td>Koolhydraten</td> <td>38 g</td> </tr> <tr> <td>Waarvan suikers</td> <td>1 g</td> </tr> <tr> <td>Voedingvezel</td> <td>6,5 g</td> </tr> <tr> <td>Eiwitten</td> <td>12 g</td> </tr> <tr> <td>Zout</td> <td>1 g</td> </tr> </tbody> </table> <p> Gezondere keuze</p>		Per 100 Gram.	Energie	995 kJ (235 kcal)	Vet	2,5 g	Waarvan verzadigd	0,4 g	Waarvan enkelvoudig onverzadigd	0,7 g	Waarvan meenvoudig onverzadigd	1 g	Koolhydraten	38 g	Waarvan suikers	1 g	Voedingvezel	6,5 g	Eiwitten	12 g	Zout	1 g	✓	X H * O	✓	✓
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Cookies	 <p>Ingrediënten Ingrediënten: Suiker, TARWEbloem, schimmel, plantaardig vet (palm, shea, kokos (in wisselende verhoudingen)), plantaardige olie (palm, rap, zonnebloem, (in wisselende verhoudingen)), 4,5% framboos, glucose-fructosestroop, emulgator (SOJA)lecithine, E471, E481, verdikkingsmiddel (pectine, E422, E466), rijsmiddel (E450, E500), voedingszuren (melkzuur, citroenzuur), conserveermiddel (E202, E202), magere cacaopeper, TARWEzittmeel, natuurlijke aroma's (MELK), schimmel- en eiwitpoeder, zout, stabilisator (E492), zuurtemplelaar (E332, E509), WEGpoeder, vierbessenconcentraat. Allergie-informatie bevat tarwegluten, ei, soja, lactose, melkeiwit. Gemaakt in een bedrijf waar ook noten worden verwerkt.</p> <p>Allergie-informatie Bevat: glutenbevattende granen, tarwe, eieren, lactose, melk, soja.</p> <p>Voedingswaarden Deze waarden gelden voor het onbereide product.</p> <table border="1" data-bbox="799 869 1082 1084"> <thead> <tr> <th></th> <th>Per 100 Gram.</th> </tr> </thead> <tbody> <tr> <td>Energie</td> <td>1895 kJ (455 kcal)</td> </tr> <tr> <td>Vet</td> <td>22 g</td> </tr> <tr> <td>Waarvan verzadigd</td> <td>13 g</td> </tr> <tr> <td>Waarvan enkelvoudig onverzadigd</td> <td>6,5 g</td> </tr> <tr> <td>Waarvan meervoudig onverzadigd</td> <td>2,5 g</td> </tr> <tr> <td>Koolhydraten</td> <td>59 g</td> </tr> <tr> <td>Waarvan suikers</td> <td>39 g</td> </tr> <tr> <td>Voedingvezel</td> <td>1,5 g</td> </tr> <tr> <td>Eiwitten</td> <td>4 g</td> </tr> <tr> <td>Zout</td> <td>0,6 g</td> </tr> </tbody> </table>		Per 100 Gram.	Energie	1895 kJ (455 kcal)	Vet	22 g	Waarvan verzadigd	13 g	Waarvan enkelvoudig onverzadigd	6,5 g	Waarvan meervoudig onverzadigd	2,5 g	Koolhydraten	59 g	Waarvan suikers	39 g	Voedingvezel	1,5 g	Eiwitten	4 g	Zout	0,6 g	✓	✗	✓	✓
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Dark chocolate	 <p>Ingrediënten Ingrediënten: Cacaomassa, suiker, cacaoeter, emulgator (SOJA)lecithine, natuurlijk vanillearoma. Cacaobestanddelen ten minste 85%. Allergie-informatie: bevat soja. Gemaakt in een bedrijf waar ook melk, pinda's en noten worden verwerkt.</p> <p>Allergie-informatie Bevat: soja.</p> <p>Voedingswaarden Deze waarden gelden voor het onbereide product.</p> <table border="1" data-bbox="783 1615 1066 1816"> <thead> <tr> <th></th> <th>Per 100 Gram.</th> </tr> </thead> <tbody> <tr> <td>Energie</td> <td>2470 kJ (590 kcal)</td> </tr> <tr> <td>Vet</td> <td>52 g</td> </tr> <tr> <td>Waarvan verzadigd</td> <td>33 g</td> </tr> <tr> <td>Waarvan enkelvoudig onverzadigd</td> <td>17 g</td> </tr> <tr> <td>Waarvan meervoudig onverzadigd</td> <td>2 g</td> </tr> <tr> <td>Koolhydraten</td> <td>17 g</td> </tr> <tr> <td>Waarvan suikers</td> <td>11 g</td> </tr> <tr> <td>Voedingvezel</td> <td>14 g</td> </tr> <tr> <td>Eiwitten</td> <td>5,5 g</td> </tr> <tr> <td>Zout</td> <td>0 g</td> </tr> </tbody> </table>		Per 100 Gram.	Energie	2470 kJ (590 kcal)	Vet	52 g	Waarvan verzadigd	33 g	Waarvan enkelvoudig onverzadigd	17 g	Waarvan meervoudig onverzadigd	2 g	Koolhydraten	17 g	Waarvan suikers	11 g	Voedingvezel	14 g	Eiwitten	5,5 g	Zout	0 g	✓	✗	✓	✓
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Chocolate confectionery	 <p>RAVELLI CHOCOLATIER ROOM BONBONS</p> <p>Omschrijving</p> <ul style="list-style-type: none"> Bonbons assorti met romige vulling Pure chocolade met aardbei 2x. Melk chocolade met ormeuvulling 2x. Witte chocolade met mokka 2x. Pure chocolade met vanille crèmevulling 2x. Melk chocolade met framboos 2x. Witte chocolade met ormeuvulling en hazelnoot 2x. Deze verpakking bevat 12 bonbons. <p>Extra informatie</p> <p>Door de afname van UTZ gecertificeerde cacao, stuurt Ravelli Chocolatier duurzame cacao's. UTZ gecertificeerde bonnen zijn getrand om betere landbouwmethoden te gebruiken, met respect voor mens en natuur. UTZ Certified is een wereldwijd programma en keurmerk voor duurzame landbouw, nu en in de toekomst. www.utzcertified.org</p> <p>Inhoud en gewicht</p> <p>200 Gram</p> <p>Ingrediënten</p> <p>Ingrediënten: Suiker, cacaozet, volle MELKpoeder, cacaozassa, welpoeder (MELK), margarine (plantaardige olie en vet (palm, kokos, soja), water, emulgator (E471, E472), voedingszout (zirconiumzuur), slagroom (8% ROOM, suiker, voedingszout (magnesium), tindaal suiker, glucosestroep, vanille, hazelnootaroma (suiker, 1% HAZELNoot, doornose, plantaardige olie (rap, comolosoem), aardbeien jam (glycose-Fruuctosestroep, 1% aardbeien, suiker, voedingszout (zirconiumzuur), geleermiddel (pectine), conserveermiddel (E202), framboosaroma (suiker, 0,5% framboos, glycosylfructosestroep, soja behoudingsconserveermiddel, karamellconcentraat, voedingszout (zirconiumzuur), zuurreguleerder (E331), framboosaroma), melk- aroma, alcohol, emulgator (SOLANOL), specerijen, natuurlijk vanillearoma. Allergie-informatie: bevat lactose, melkvet, soja, hazelnoot. Gemaakt in een bedrijf waar ook pinda's en andere noten worden verwerkt.</p> <p>Allergie-informatie</p> <p>Bevat: lactose, melk, hazelnoot, soja, noten.</p> <p>Voedingswaarden</p> <p>Deze waarden gelden voor het onbereidde product.</p> <table border="1"> <thead> <tr> <th></th> <th>Per 100 Gram</th> </tr> </thead> <tbody> <tr> <td>Energie</td> <td>2000 kJ (500 kcal)</td> </tr> <tr> <td>Vet</td> <td>32 g</td> </tr> <tr> <td>Waarvan verzadigd</td> <td>18 g</td> </tr> <tr> <td>Koolhydraat</td> <td>49 g</td> </tr> <tr> <td>Waarvan suikers</td> <td>48 g</td> </tr> <tr> <td>Voedingszout</td> <td>3,5 g</td> </tr> <tr> <td>Eiwitten</td> <td>3,5 g</td> </tr> <tr> <td>Zout</td> <td>0,2 g</td> </tr> </tbody> </table>		Per 100 Gram	Energie	2000 kJ (500 kcal)	Vet	32 g	Waarvan verzadigd	18 g	Koolhydraat	49 g	Waarvan suikers	48 g	Voedingszout	3,5 g	Eiwitten	3,5 g	Zout	0,2 g	X	X	✓ + *	✓
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Store disclaimer	<p>Over prijs- en productinformatie</p> <p>Bij Albert Heijn doen we er alles aan om te zorgen dat de prijs- en productinformatie van de producten die we verkopen zo accuraat mogelijk is. Echter, omdat producten regelmatig worden verbeterd, kan productinformatie zoals ingrediënten, voedingswaarden, diët of allergie-informatie gensgeld veranderen. We raden je daarom aan om altijd eerst de verpakking te lezen alvorens het product te nuttigen. Zijn er vragen of opmerkingen dan kan altijd contact opgenomen worden met onze klantenservice.</p>																						

Annex No 5. Latvia

Information obtained in distance selling grocery store "Maxima" at www.e-maxima.lv in Latvia. All the photos taken on 24 April, 2017. The original language is Latvian, translation done to English and can be seen in discussions in the article.

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice																																				
Cashew nuts	 <p>Izcelsmes valsts Polija</p> <p>Apraksts Indijas rieksti</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiskā vērtība(kJ/kcal)</td> <td>2530 kJ / 609 kcal</td> <td></td> <td></td> </tr> <tr> <td>Tauki</td> <td>46</td> <td></td> <td></td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>8,4</td> <td></td> <td></td> </tr> <tr> <td>ogļhidrāti</td> <td>24</td> <td></td> <td></td> </tr> <tr> <td>cukurs</td> <td>6</td> <td></td> <td></td> </tr> <tr> <td>āķiedrvielas</td> <td>3</td> <td></td> <td></td> </tr> <tr> <td>olbaltumvielas</td> <td>23,3</td> <td></td> <td></td> </tr> <tr> <td>sāļi</td> <td>0,04</td> <td></td> <td></td> </tr> </tbody> </table> <p>Netto 150 g</p> <p>Zīmols Sunny Frutown</p> <p>Uzglabāšana Glabāt sausā un vēsā vietā.</p> <p>Cita informācija Uzmanību! Mazi bērni var aizrties.</p> <p>Informācija par produktu</p> <p>Ražotājs LIAB „Arimes”, Kirtimų g. 49, Vilnius, Lietuva</p> <p>Sastāvdaļas Indijas rieksti. Var saturēt sezama sēklu, zemesriekstu, citu riekstu un kviešu miltu daļiņas.</p>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiskā vērtība(kJ/kcal)	2530 kJ / 609 kcal			Tauki	46			piesātinātās taukskābes	8,4			ogļhidrāti	24			cukurs	6			āķiedrvielas	3			olbaltumvielas	23,3			sāļi	0,04			X	X	✓	✓
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Olive oil	 <p>Izcelsmes valsts Itālija</p> <p>Apraksts Oļīveļa POMACE GOCCIA D'ORO 500ml</p> <p>Energētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml 1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Energētiskā vērtība(kJ/kcal)</td> <td>824/3369</td> <td></td> </tr> <tr> <td>Tauki</td> <td>91,6</td> <td></td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>13,8</td> <td></td> </tr> <tr> <td>mononepiesātinātās taukskābes</td> <td>68,5</td> <td></td> </tr> <tr> <td>polinepiesātinātās taukskābes</td> <td>9,3</td> <td></td> </tr> </tbody> </table> <p>E vitamīns (mg)15</p> <p>Netto 500 ml</p> <p>Zīmols Goccia d'oro</p> <p>Uzglabāšana Uzglabāt vēsā, sausā vietā. Sargāt no tiešas saules staru iedarbības. Izlietot līdz (skat.uz iepakojuma, augšā).</p> <p>Cita informācija Oļīveļa kļūst duļķāna un sabiezē pie temperatūras, kas zemāka par 10°C, siltumā atgūstot savu dabisko konsistenci. Zemas temperatūras nekādā ziņā neietekmē tās kvalitāti.</p> <p>Informācija par produktu</p> <p>Ražotājs F.LLI RUATA S.p.A.12040 Baldissero d'Alba, ItalyFax (+39) 0172-40626www.gocciadoro.it</p> <p>Izplatītājs SIA "FUDEKS"Liļļu iela 20, Mārupe, LV-2167+371 67442300</p> <p>Sastāvdaļas Eļļa, kas sastāv vienīgi no eļļām, kuras iegūtas, pārstrādājot olīvu izpiedu, un eļļām, kuras iegūtas tieši no olīvām.</p>		100 g/ml 1 porcija (kg)	% porcija	Energētiskā vērtība(kJ/kcal)	824/3369		Tauki	91,6		piesātinātās taukskābes	13,8		mononepiesātinātās taukskābes	68,5		polinepiesātinātās taukskābes	9,3		X	X	X	X
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Orange juice	 <p>1,48 € (1,48 € / l)</p> <p><input type="text" value="1"/> <input type="button" value="Pievienot"/></p> <p>Izcelsmes valsts Igaunija</p> <p>Apraksts Apelsīnu sula no koncentrētas sulas</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiskā vērtība(kJ/kcal)</td> <td>196kJ/47kcal</td> <td>489kJ/117kcal</td> <td>6</td> </tr> <tr> <td>Tauki</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>0</td> <td>0</td> <td>0</td> </tr> <tr> <td>ogļhidrāti</td> <td>11</td> <td>28</td> <td>11</td> </tr> <tr> <td>cukurs</td> <td>8,6</td> <td>21</td> <td>24</td> </tr> <tr> <td>olbaltumvielas</td> <td>0,4</td> <td>1,0</td> <td>2</td> </tr> <tr> <td>sāļi</td> <td>0,03</td> <td>0,07</td> <td>1</td> </tr> </tbody> </table> <p>Netto 1 l</p> <p>Zīmols GUTTA</p> <p>Uzglabāšana Uzglabāt temperatūrā no +2°C līdz +25°C. Pirms lietošanas sakratīt! Pēc atvēršanas glabāt temperatūrā no +2°C līdz +6°C, izlietot 3 dienu laikā. Izlietot līdz: skat. uz iepakojuma.</p> <p>Informācija par produktu</p> <p>Ražotājs a/s GUTTA, Valdlauči, Ķekavas pagasts, Ķekavas novads, LV - 1076, Latvija</p> <p>Izplatītājs SIA NP Foods, Miera iela 22, Rīga LV-1001 +371 67080361, www.gutta.lv</p> <p>Sastāvdaļas Apelsīnu sula no koncentrētas sulas.</p>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiskā vērtība(kJ/kcal)	196kJ/47kcal	489kJ/117kcal	6	Tauki	0	0	0	piesātinātās taukskābes	0	0	0	ogļhidrāti	11	28	11	cukurs	8,6	21	24	olbaltumvielas	0,4	1,0	2	sāļi	0,03	0,07	1	X	X	X	X
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Cottage cheese	 <p>1,95 € (3,90 € / kg)</p> <p>1 Plešvienot</p> <p>Izcelsmes valsts Latvija</p> <p>Apraksts Graudainais biezpiens 7%</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiskā vērtība(kJ/kcal)</td> <td>519/124</td> <td></td> <td></td> </tr> <tr> <td>Tauki</td> <td>7.1</td> <td></td> <td></td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>5.1</td> <td></td> <td></td> </tr> <tr> <td>ogļhidrāti</td> <td>4.2</td> <td></td> <td></td> </tr> <tr> <td>cukurs</td> <td>4.2</td> <td></td> <td></td> </tr> <tr> <td>olbaltumvielas</td> <td>11.0</td> <td></td> <td></td> </tr> <tr> <td>sāls</td> <td>0.9</td> <td></td> <td></td> </tr> </tbody> </table> <p>Netto 500 g</p> <p>Zīmols Baltais</p> <p>Uzglabāšana Uzglabāt pie temperatūras + 2°C līdz +6 °C.Izlietot līdz: skat. uz iepakojuma.</p> <p>Informācija par produktu</p> <p>Ražotājs A/S Tukuma Piens, Tukums, Jelgavas iela 7. LV-3101, www.baltais.lv</p> <p>Sastāvdaļas VĀJPIENA SIERA graudi, saldais KRĒJUMS, sāls</p>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiskā vērtība(kJ/kcal)	519/124			Tauki	7.1			piesātinātās taukskābes	5.1			ogļhidrāti	4.2			cukurs	4.2			olbaltumvielas	11.0			sāls	0.9			X	X	✓	X
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Enerģētiskā vērtība(kJ/kcal)	519/124																																				
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piesātinātās taukskābes	5.1																																				
ogļhidrāti	4.2																																				
cukurs	4.2																																				
olbaltumvielas	11.0																																				
sāls	0.9																																				

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice																																
Greek yogurt	 <p>0,55 € <input type="text" value="1"/> Pievienot (3,67 € / kg)</p> <p>Izcelsmes valsts Niederlande</p> <p>Apraksts Dabīgs vājpiena grieķu jogurts, tauku saturs 0%.</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiska vērtība(kJ/kcal)</td> <td>210 kJ / 50 kcal</td> <td></td> <td></td> </tr> <tr> <td>Tauki</td> <td>0 g</td> <td></td> <td></td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>0 g</td> <td></td> <td></td> </tr> <tr> <td>ogļhidrāti</td> <td>4 g</td> <td></td> <td></td> </tr> <tr> <td>cukurs</td> <td>0 g</td> <td></td> <td></td> </tr> <tr> <td>olbaltumvielas</td> <td>9 g</td> <td></td> <td></td> </tr> <tr> <td>sāls</td> <td>0 g</td> <td></td> <td></td> </tr> </tbody> </table> <p>Netto 150 g</p> <p>Zīmols Katharos</p> <p>Uzglabāšana Uzglabāt temperatūrā no +1 °C – +7 °C.Izlietot līdz: skat. uz iepakojuma.</p> <p>Informācija par produktu</p> <p>Ražotājs SCHIMMERTNetherlands(NL Z 1655 EG) Izplatītājs EUROSER Sp. z o.o., ul.Geologiczna 20, 02-246, Varšava (Warszawa), Polija. www.euroser.pl</p> <p>Sastāvdaļas Pastērisēts govs VĀJPIENS, jogurta baktēriju kultūras.</p>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiska vērtība(kJ/kcal)	210 kJ / 50 kcal			Tauki	0 g			piesātinātās taukskābes	0 g			ogļhidrāti	4 g			cukurs	0 g			olbaltumvielas	9 g			sāls	0 g			X	X	✓	X
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Fruit yogurt	 <p>1,99 € (4,15 € / kg)</p> <p>1 Pievienot</p> <p>Izcelsmes valsts Jogurts ACTIVIA zemeņu 4x120g</p> <p>Apraksts Danone Activia Actiregularis zemeņu jogurts 4 x 120g</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiskā vērtība(kJ/kcal)</td> <td>386 kJ/92 kcal</td> <td>463 kJ/109 kcal</td> <td></td> </tr> <tr> <td>Tauki</td> <td>2,6 g</td> <td>3,2 g</td> <td></td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>2,0 g</td> <td>2,4 g</td> <td></td> </tr> <tr> <td>ogļhidrāti</td> <td>13,2 g</td> <td>15,8 g</td> <td></td> </tr> <tr> <td>cukurs</td> <td>12,8 g</td> <td>15,4 g</td> <td></td> </tr> <tr> <td>šķiedrvielas</td> <td>0,2 g</td> <td>0,3 g</td> <td></td> </tr> <tr> <td>sāļi</td> <td>0,14 g</td> <td>0,17 g</td> <td></td> </tr> </tbody> </table> <p>Kalcijs (mg)130</p> <p>Netto 4x120 g</p> <p>Zīmols Activia</p> <p>Uzglabāšana Uzglabāt vēsumā 2-6°C.Izlietot līdz: skat. uz iepakojuma.</p> <p>Informācija par produktu</p> <p>Ražotājs Danone Sp. z o.o.ul. Redutowa 9/2301-103 VaršavaPolija</p> <p>Izplatītājs SIA "Sanitex"Vienības gatve 109Rīga,LatvijaTālr. 67048400www.activia.lv</p> <p>Sastāvdaļas PIENS. Cukurs. Zemeses 8,2%. VĀJPIENA pulveris.PIENA olbaltumvielas. Koncentrēta melno burkānu sula. Biezīnātājs;pektīns. Krāsviela: karmīns. Aromāts. Dzīvās jogurta kultūras un bifidobaktērijas ActiRegularis Bifidobacterium DN-173010 (10⁸ vienības/g).Var saturēt nelielu daudzumu glutēna.</p>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiskā vērtība(kJ/kcal)	386 kJ/92 kcal	463 kJ/109 kcal		Tauki	2,6 g	3,2 g		piesātinātās taukskābes	2,0 g	2,4 g		ogļhidrāti	13,2 g	15,8 g		cukurs	12,8 g	15,4 g		šķiedrvielas	0,2 g	0,3 g		sāļi	0,14 g	0,17 g		X	X	✓	✓
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Bread	 <p>Izcelsmes valsts Latvija</p> <p>Apraksts Pļavas tumšā sēklu maize Vairoklis</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1" data-bbox="692 551 1043 734"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiskā vērtība(kJ/kcal)</td> <td>1235 kJ / 293 kcal</td> <td>208 kJ / 49 kcal</td> <td>2</td> </tr> <tr> <td>Tauki</td> <td>6.6</td> <td>1.1</td> <td>2</td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>0.8</td> <td>0.1</td> <td>1</td> </tr> <tr> <td>ogļhidrāti</td> <td>46.4</td> <td>7.6</td> <td>3</td> </tr> <tr> <td>cukurs</td> <td>3.2</td> <td>0.5</td> <td>1</td> </tr> <tr> <td>šķiedrvielas</td> <td>4.2</td> <td>0.7</td> <td>3</td> </tr> <tr> <td>olbaltumvielas</td> <td>10.0</td> <td>1.6</td> <td>3</td> </tr> <tr> <td>sāls</td> <td>1.1</td> <td>0.2</td> <td>3</td> </tr> </tbody> </table> <p>Netto 0.280 kg</p> <p>Zīmols Pļavas</p> <p>Uzglabāšana Uzglabāt sausā un vēsā vietā.Izlietot līdz: sk. uz iepakojuma</p> <p>Informācija par produktu</p> <p>Ražotājs A/S Hanzas Maiznīcas, Pīldas iela 10, Rīga, LV-1035, Latvija. Tālr.: +371 67505815</p> <p>Sastāvdaļas Kviešumilti, ūdens, saulespuķu sēklas (3.1%), linsēklas (3.1%), sezama sēklas (3.1%), raugs, miežuiesala ekstrakts, cukurs, pārtikas ražošanas sāls, rapšu eļļa, kviešu lipēklis.</p>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiskā vērtība(kJ/kcal)	1235 kJ / 293 kcal	208 kJ / 49 kcal	2	Tauki	6.6	1.1	2	piesātinātās taukskābes	0.8	0.1	1	ogļhidrāti	46.4	7.6	3	cukurs	3.2	0.5	1	šķiedrvielas	4.2	0.7	3	olbaltumvielas	10.0	1.6	3	sāls	1.1	0.2	3	X	X	✓	X
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Cookies	<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 30%;">  </div> <div style="width: 60%;"> <p>0,77 € (4,28 € / kg)</p> <p>1 Pievienot</p> <p>Izcelsmes valsts Latvija</p> <p>Apraksts Cepumi Selga klasika</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiska vērtība(kJ/kcal)</td> <td>1826kJ/434kcal</td> <td>183 kJ/43kcal</td> <td>2</td> </tr> <tr> <td>Tauki</td> <td>14.2 g</td> <td>1.4 g</td> <td>2</td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>6.0g</td> <td>0.6g</td> <td>3</td> </tr> <tr> <td>ogļhidrāti</td> <td>68.3 g</td> <td>6.8g</td> <td>3</td> </tr> <tr> <td>cukurs</td> <td>24.1 g</td> <td>2.4 g</td> <td>3</td> </tr> <tr> <td>olbaltumvielas</td> <td>8.2g</td> <td>0.8 g</td> <td>2</td> </tr> <tr> <td>sāls</td> <td>0.8g</td> <td>0.08 g</td> <td>1</td> </tr> </tbody> </table> <p>Netto 180 g</p> <p>Zīmols Selga</p> <p>Uzglabāšana Uzglabāt sausā un vēsā vietā (18 ± 5)°C. Derīgs līdz: skat. uz iepakojuma.</p> <p>Informācija par produktu</p> <p>Ražotājs a/s Staburadze, Artīlērijas iela 55, Rīga, LV - 10091, Latvija</p> <p>Izplatītājs SIA NP Foods, Miera iela 22, Rīga LV-1001, Latvija, +371 67080361, www.laima.lv</p> <p>Sastāvdaļas kviešu milti, cukurs, sviests, augu tauki(basijas kodolu eļļa, palmu eļļa, emulgators taukskābju mono un diglicerīdi, krāsviela karotīni, aromatizētājs) oļu masa, iebiezināts piens ar cukuru, irdinātāji (nātrija bikarbonāts, amonija bikarbonāts) , sāls, aromatizētājs vaniļīns, emulgators sojas lecitīni. Var saturēt zemesriekstu, riekstu daļiņas.</p> </div> </div>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiska vērtība(kJ/kcal)	1826kJ/434kcal	183 kJ/43kcal	2	Tauki	14.2 g	1.4 g	2	piesātinātās taukskābes	6.0g	0.6g	3	ogļhidrāti	68.3 g	6.8g	3	cukurs	24.1 g	2.4 g	3	olbaltumvielas	8.2g	0.8 g	2	sāls	0.8g	0.08 g	1	<p>✓ · / X</p>	<p>X</p>	<p>✓</p>	<p>✓ · / X</p>
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	<div style="display: flex; justify-content: space-between; align-items: flex-start;"> <div style="width: 30%;">  </div> <div style="width: 60%;"> <p>3,99 € (3,99 € / kg)</p> <p>0,5 kg Pievienot</p> <p>Izcelsmes valsts Latvija</p> <p>Apraksts Sastāvs: KVIEŠU milti, cukurs, SVIESTS (PIENS), augu tauki(palmu, basijas), OLU masa, iebiezināts PIENS ar cukuru, irdinātāji (nātrija hidrogēnkarbonāts, amonija hidrogēnkarbonāts), sāls, emulgators saulespuķu lecitīns, aromatizētājs vaniļīns. Var saturēt SEZAMA, RIEKSTU daļiņas. Enerģētiskā vērtība: 1826kJ/434kcal Temperatūras režīms: Uzglabāt sausā un vēsā vietā (18±5)° C. Ražotājs: Orkla Confectionery & Snacks Latvija</p> <p>Informācija par produktu</p> <p>Izplatītājs MAXIMA Latvija SIA, „Abrās”, Ķekavas pagasts, Ķekavas novads, LV-2111, Latvija. Bezmaksas informatīvais tālrunis – 80002020.</p> <p>Sastāvdaļas KVIEŠU milti, cukurs, sviests, augu eļļas, OLU masa, IEBIEZINĀTS PIENS AR CUKURU, irdinātāji(nātrija bikarbonāts, amonija bikarbonāts), sāls, emulgatori (SOJAS lecitīni, taukskābju mono undiglicerīdi), krāsviela karotīni, vaniļīna aromatizētājs.</p> </div> </div>																																				

Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice																																
Dark chocolate	 <p>1,65 € (18,33 € / kg)</p> <p><input type="text" value="1"/> <input type="button" value="Pievienot"/></p> <p>Izcelsmes valsts Latvija</p> <p>Apraksts Porainā rūgtā šokolāde Laima</p> <p>Energētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Energētiskā vērtība(kJ/kcal)</td> <td>2167 kJ/521 kcal</td> <td>217kJ/52kcal3</td> <td></td> </tr> <tr> <td>Tauki</td> <td>38,3 g</td> <td>3,8 g</td> <td>5</td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>22,6 g</td> <td>2,3 g</td> <td>12</td> </tr> <tr> <td>ogļhidrāti</td> <td>34,4 g</td> <td>3,4 g</td> <td>1</td> </tr> <tr> <td>cukurs</td> <td>29,9 g</td> <td>3,0 g</td> <td>3</td> </tr> <tr> <td>olbaltumvielas</td> <td>9,7 g</td> <td>1,0g</td> <td>2</td> </tr> <tr> <td>sāls</td> <td>0,2g</td> <td>0,02 g</td> <td>0,3</td> </tr> </tbody> </table> <p>Netto 90 g</p> <p>Zīmols Laima</p> <p>Uzglabāšana Uzglabāt sausā un vēsā vietā (18 ± 3)°C.Derīgs līdz: skat. uz iepakojuma.</p> <p>Informācija par produktu</p> <p>Ražotājs a/s LAIMA, Miera iela 22, Rīga, LV - 1001, Latvija Izplatītājs SIA NP Foods, Miera iela 22, Rīga LV - 1001, Latvija, +371 67080361, www.laima.lv</p> <p>Sastāvdaļas Sastāvdaļas: Kakao masa, cukurs, kakao pulveris ar samazinātu tauku saturu, kakao sviests, emulgators amonija fosfatīdi, aromatizētājs. Var saturēt riekstu, zemesriekstu, piena, kviešu lipekļa daļiņas. Kakao saturs nav mazāks par 70%.</p>		100 g/ml	1 porcija (kg)	% porcija	Energētiskā vērtība(kJ/kcal)	2167 kJ/521 kcal	217kJ/52kcal3		Tauki	38,3 g	3,8 g	5	piesātinātās taukskābes	22,6 g	2,3 g	12	ogļhidrāti	34,4 g	3,4 g	1	cukurs	29,9 g	3,0 g	3	olbaltumvielas	9,7 g	1,0g	2	sāls	0,2g	0,02 g	0,3	X	X	✓	✓
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Chocolate confectionery	 <p>2,19 € (13,69 € / kg)</p> <p>1 Pievienot</p> <p>Izcelsmes valsts Latvija</p> <p>Apraksts Konfektes LAIMA LĀCĪTIS-ĶĒPAINĪTIS 160g</p> <p>Enerģētiskā vērtība (nutrition)</p> <table border="1"> <thead> <tr> <th></th> <th>100 g/ml</th> <th>1 porcija (kg)</th> <th>% porcija</th> </tr> </thead> <tbody> <tr> <td>Enerģētiskā vērtība(kJ/kcal)</td> <td>2183 kJ/522 kcal</td> <td></td> <td></td> </tr> <tr> <td>Tauki</td> <td>28,7 g</td> <td></td> <td></td> </tr> <tr> <td>piesātinātās taukskābes</td> <td>14,0 g</td> <td></td> <td></td> </tr> <tr> <td>ogļhidrāti</td> <td>60,8 g</td> <td></td> <td></td> </tr> <tr> <td>cukurs</td> <td>54,1 g</td> <td></td> <td></td> </tr> <tr> <td>olbaltumvielas</td> <td>5,1 g</td> <td></td> <td></td> </tr> <tr> <td>saļš</td> <td>0,4g</td> <td></td> <td></td> </tr> </tbody> </table> <p>Netto 160 g</p> <p>Zīmols LAIMA</p> <p>Uzglabāšana Uzglabāt sausā un vēsā vietā (18 ± 3)°C. Derīgs līdz: skat. uz iepakojuma.</p> <p>Informācija par produktu</p> <p>Ražotājs a/s LAIMA, Miera iela 22, Rīga, LV - 1001, Latvija Izplatītājs SIA NP Foods, Miera iela 22, Rīga LV-1001, Latvija +371 67080361, www.laima.lv</p> <p>Sastāvdaļas Šokolāde 36%.Sastāvdaļas: Cukurs, mandeļi 17%, kakao sviests, kakao masa, vafeles 6% (kviešu milti, olu masa, sāls, irdinātājs nātrija bikarbonāts, sojas lecitīns), emulgatori (amonija fosfatīdi, poliglicerīna poliricinoleāts), aromatizētājs. Var saturēt PIENA, ZEMESRIEKSTU daļiņas. Kakao saturs šokolādē nav mazāks par 39%.</p>		100 g/ml	1 porcija (kg)	% porcija	Enerģētiskā vērtība(kJ/kcal)	2183 kJ/522 kcal			Tauki	28,7 g			piesātinātās taukskābes	14,0 g			ogļhidrāti	60,8 g			cukurs	54,1 g			olbaltumvielas	5,1 g			saļš	0,4g			X	X	✓	✓
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 <p>13,22 € (13,22 € / kg)</p> <p>0,5 kg Pievienot</p> <p>Izcelsmes valsts Latvija</p> <p>Apraksts Sastāvs: cukurs, MANDELES 17%, kakao sviests, kakao masa, vafeles 6% (KVIEŠU milti, OLU masa, sāls, irdinātājs nātrija bikarbonāts, SOJAS lecitīns), emulgatori (amonija fosfatīdi, poliglicerīna poliricinoleāts), aromatizētājs. Var saturēt PIENA, ZEMESRIEKSTU daļiņas. Kakao saturs šokolādē nav mazāks par 39%. 100 g produkta satur: enerģētiskā vērtība – 2216kJ/ 530 kcal, tauki – 30 g, tostarp piesātinātās taukskābes - 14 g, ogļhidrāti – 60 g, tostarp cukuri – 53 g, olbaltumvielas – 5,1 g, sāļš – 0,05 g. Uzglabāt sausā un vēsā vietā (18±3)° C.</p> <p>Informācija par produktu</p> <p>Ražotājs a/s LAIMA, Miera iela 22, Rīga, LV - 1001, Latvija Izplatītājs SIA NP Foods, Miera iela 22, Rīga LV-1001, Latvija +371 67080361, www.laima.lv</p> <p>Sastāvdaļas Šokolāde 36%.Sastāvdaļas: Cukurs, mandeļi 17%, kakaosviests, kakao masa, vafeles 6% (kviešu milti,olu masa, sāls, irdinātājs nātrijabikarbonāts, sojas lecitīns), emulgatori (amonija fosfatīdi, poliglicerīna poliricinoleāts), aromatizētājs. Var saturēt pienu,zemesriekstu daļiņas. Kakao saturs šokolādē nav mazāks par 39%.</p>	X	X	✓	✓																																	

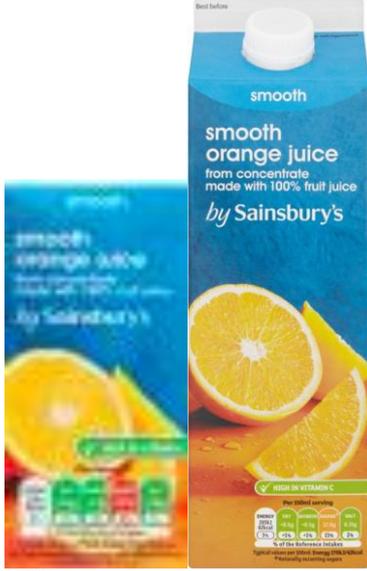
Name of product	Photo of product and its relevant information	Front of pack labels	Additional forms	Allergen notice	Precautionary notice
Store disclaimer	<p>Produkta informācija un apraksts</p> <ul style="list-style-type: none"> ▫ Produkta izskats var atšķirties no attēlā redzamā. ▫ Piegādātais produkts var būt atšķirīgā iepakojumā, krāsā un formā. ▫ Produkta apraksts tīmekļa vietnē var atšķirties no informācijas uz produkta iepakojuma, jo produkta sastāvdaļas var mainīties. ▫ Iesakām vienmēr izlasīt uz produkta iepakojuma norādīto informāciju. ▫ Akciju preču daudzums ir ierobežots. ▫ Piegādātājs: MAXIMA 				

Annex No 6. The United Kingdom

Information obtained in distance selling grocery store "Sainsbury's" at <http://www.sainsburys.co.uk/shop/gb/groceries> in the UK. All the photos taken on 24 April, 2017. The original language is English.

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Cashew nuts	 <p>Table of Nutritional Information</p> <table border="1"> <thead> <tr> <th>NA</th> <th>Per 100g</th> <th>Per pack</th> <th>% based on RI for Average Adult</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Energy</td> <td>2558kJ</td> <td>767kJ</td> <td>-</td> </tr> <tr> <td>617kcal</td> <td>185kcal</td> <td>9%</td> </tr> <tr> <td>Fat</td> <td>49.3g</td> <td>14.8g</td> <td>21%</td> </tr> <tr> <td>Saturates</td> <td>9.9g</td> <td>2.9g</td> <td>15%</td> </tr> <tr> <td>Mono unsaturates</td> <td>28.9g</td> <td>8.7g</td> <td>-</td> </tr> <tr> <td>Polyunsaturates</td> <td>8.9g</td> <td>2.7g</td> <td>-</td> </tr> <tr> <td>Carbohydrate</td> <td>20.5g</td> <td>6.2g</td> <td>2%</td> </tr> <tr> <td>Total Sugars</td> <td>5.4g</td> <td>1.6g</td> <td>2%</td> </tr> <tr> <td>Starch</td> <td>15.1g</td> <td>4.5g</td> <td>-</td> </tr> <tr> <td>Fibre</td> <td>6.1g</td> <td>1.8g</td> <td>-</td> </tr> <tr> <td>Protein</td> <td>19.8g</td> <td>5.9g</td> <td>12%</td> </tr> <tr> <td>Salt</td> <td>0.03g</td> <td><0.01g</td> <td>-</td> </tr> </tbody> </table> <p>RI= Reference Intakes of an average adult (8400kJ / 2000kcal)</p> <p>This pack contains 1 servings</p> <p>Table of Vitamins and Minerals Information</p> <table border="1"> <thead> <tr> <th>NA</th> <th>Per 100g</th> <th>% NRV Per 100g</th> <th>Per pack</th> <th>% NRV Per pack</th> </tr> </thead> <tbody> <tr> <td>Zinc</td> <td>5.9mg</td> <td>59</td> <td>1.8mg</td> <td>18</td> </tr> </tbody> </table> <p>NRV = Nutrient Reference Value</p> <p>Dietary Information</p> <p>Allergy Advice For allergens, see ingredients in bold Also, not suitable for customers with an allergy to peanuts, other nuts, wheat or soya due to manufacturing methods</p> <p>Ingredients Cashew Nut. - product sale and legal identification - brand - ingredients list + allergens - net weight - TUC - nutritional data: for 100g, per serving - children safety - storage conditions</p>	NA	Per 100g	Per pack	% based on RI for Average Adult	Energy	2558kJ	767kJ	-	617kcal	185kcal	9%	Fat	49.3g	14.8g	21%	Saturates	9.9g	2.9g	15%	Mono unsaturates	28.9g	8.7g	-	Polyunsaturates	8.9g	2.7g	-	Carbohydrate	20.5g	6.2g	2%	Total Sugars	5.4g	1.6g	2%	Starch	15.1g	4.5g	-	Fibre	6.1g	1.8g	-	Protein	19.8g	5.9g	12%	Salt	0.03g	<0.01g	-	NA	Per 100g	% NRV Per 100g	Per pack	% NRV Per pack	Zinc	5.9mg	59	1.8mg	18	✓	✓	✓	✓
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Olive oil	 <p>Description Extra Virgin Olive Oil For salad dressing and flavouring Produced with extra virgin olive oils from Greece, Italy, Spain and Tunisia Superior category Olive Oil obtained directly from olives and solely by mechanical means. This Extra Virgin Olive Oil has a unique rich and fruity flavour and is perfect dipping, drizzling and marinating, and as a healthy finish to steamed vegetables, baked potatoes and soups. In 1867, Filippo Berio began crafting olive oils worthy of his family and friends, not to mention his name.</p> <p>Nutrition Table of Nutritional Information</p> <table border="1"> <thead> <tr> <th></th> <th>(per 100ml)</th> </tr> </thead> <tbody> <tr> <td>Energy</td> <td>3378kJ-822kcal</td> </tr> <tr> <td>Fat</td> <td>91.3 g</td> </tr> <tr> <td>of which saturates</td> <td>15.5 g</td> </tr> <tr> <td>Mono-unsaturates</td> <td>66.1 g</td> </tr> <tr> <td>Polysaturates</td> <td>10.7 g</td> </tr> <tr> <td>Carbohydrate</td> <td>0 g</td> </tr> <tr> <td>of which sugar</td> <td>0 g</td> </tr> <tr> <td>Fibre</td> <td>0 g</td> </tr> <tr> <td>Protein</td> <td>0 g</td> </tr> <tr> <td>Salt</td> <td>0 g</td> </tr> </tbody> </table> <p>Manufacturer Salvo S.p.A., Via Montemano N. 1600, 55040 Massarosa (Lucca), Italy.</p> <p>Nutrition Per 15ml serving Typical Values</p> <table border="1"> <thead> <tr> <th>ENERGY</th> <th>FAT</th> <th>SATURATE</th> <th>SUGARS</th> <th>SALT</th> </tr> </thead> <tbody> <tr> <td>508kJ 123kcal 15%</td> <td>13.7g 20%</td> <td>2.0g 10%</td> <td>0g 0%</td> <td>0g 0%</td> </tr> </tbody> </table> <p>% of the Reference Intakes Typical Values Per 100ml : Energy 3384 kJ/823 kcal RI= Reference intake of an average adult (8400 kJ/2000 kcal)</p> <p>Table of Nutritional Information</p> <table border="1"> <thead> <tr> <th>Typical Values</th> <th>Per 100ml</th> <th>Per 15ml serving</th> <th>% based on RI for Average Adult</th> </tr> </thead> <tbody> <tr> <td>Energy</td> <td>3384kJ 823kcal</td> <td>508kJ 123kcal</td> <td>- 6%</td> </tr> <tr> <td>Fat</td> <td>91.5g</td> <td>13.7g</td> <td>20%</td> </tr> <tr> <td>Saturates</td> <td>13.1g</td> <td>2.0g</td> <td>10%</td> </tr> <tr> <td>Mono-unsaturates</td> <td>66.7g</td> <td>10.0g</td> <td>-</td> </tr> <tr> <td>Polysaturates</td> <td>7.5g</td> <td>1.1g</td> <td>-</td> </tr> <tr> <td>Carbohydrate</td> <td>0g</td> <td>0g</td> <td>-</td> </tr> <tr> <td>Sugars</td> <td>0g</td> <td>0g</td> <td>-</td> </tr> <tr> <td>Fibre</td> <td>0g</td> <td>0g</td> <td>-</td> </tr> <tr> <td>Protein</td> <td>0g</td> <td>0g</td> <td>-</td> </tr> <tr> <td>Salt</td> <td>0g</td> <td>0g</td> <td>-</td> </tr> </tbody> </table> <p>Reference intake of an average adult (8400 kJ / 2000 kcal) This pack contains 33 servings</p> <p>Ingredients Extra Virgin Olive Oil. Superior category olive oil obtained directly from olives and solely by mechanical means.</p>		(per 100ml)	Energy	3378kJ-822kcal	Fat	91.3 g	of which saturates	15.5 g	Mono-unsaturates	66.1 g	Polysaturates	10.7 g	Carbohydrate	0 g	of which sugar	0 g	Fibre	0 g	Protein	0 g	Salt	0 g	ENERGY	FAT	SATURATE	SUGARS	SALT	508kJ 123kcal 15%	13.7g 20%	2.0g 10%	0g 0%	0g 0%	Typical Values	Per 100ml	Per 15ml serving	% based on RI for Average Adult	Energy	3384kJ 823kcal	508kJ 123kcal	- 6%	Fat	91.5g	13.7g	20%	Saturates	13.1g	2.0g	10%	Mono-unsaturates	66.7g	10.0g	-	Polysaturates	7.5g	1.1g	-	Carbohydrate	0g	0g	-	Sugars	0g	0g	-	Fibre	0g	0g	-	Protein	0g	0g	-	Salt	0g	0g	-	<p>Front of pack labels: ✓ : ✓ X</p>	<p>Additional forms: ✓ X</p>	<p>Allergen notice: X</p>	<p>Precautionary notice: X</p>
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Chocolate confectionery	 <p>ENERGY 524kJ 125kcal 6%</p> <p>FAT 5.4g 8%</p> <p>SATURATE 2.9g 15%</p> <p>SUGARS 15.3g 17%</p> <p>SALT 0.08g 1%</p> <p>of an adult's Reference Intake (RI)* Energy Per 100g: 2011kJ/480kcal *Reference Intake of an average adult (8400kJ/2000kcal) **5 pieces</p> <p>Table of Nutritional Information</p> <table border="1" data-bbox="453 1081 983 1402"> <thead> <tr> <th></th> <th>Per 100g</th> <th>Per serving**</th> <th>Reference Intake*</th> <th>% RI*</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Energy</td> <td>2011kJ</td> <td>524kJ</td> <td>8400kJ</td> <td>-</td> </tr> <tr> <td>480kcal</td> <td>125kcal</td> <td>2000kcal</td> <td>6%</td> </tr> <tr> <td>Fat</td> <td>20.8g</td> <td>5.4g</td> <td>70g</td> <td>8%</td> </tr> <tr> <td>of which: saturates</td> <td>11.2g</td> <td>2.9g</td> <td>20g</td> <td>15%</td> </tr> <tr> <td>Carbohydrate</td> <td>68.3g</td> <td>17.8g</td> <td>260g</td> <td>7%</td> </tr> <tr> <td>of which: sugars</td> <td>59.0g</td> <td>15.3g</td> <td>90g</td> <td>17%</td> </tr> <tr> <td>Fibre</td> <td>1.1g</td> <td>0.3g</td> <td>-</td> <td>-</td> </tr> <tr> <td>Protein</td> <td>4.2g</td> <td>1.1g</td> <td>50g</td> <td>2%</td> </tr> <tr> <td>Salt</td> <td>0.30g</td> <td>0.08g</td> <td>6g</td> <td>1%</td> </tr> </tbody> </table> <p>*Reference Intake of an average adult (8400kJ/2000kcal) **5 pieces Contains approximately 4 servings Portions should be adjusted for children of different ages</p> <p>Ingredients Glucose Syrup, Sugar, Whole and Skimmed Milk Powder, Invert Sugar Syrup, Vegetable Fat (Palm, Shea/Illipe/Mango Kernel/Kokum Gurgi/Sal), Cocoa Mass, Cocoa Butter, Sweetened Condensed Skimmed Milk, Lactose and Proteins from Whey (from Milk), Whey powder (from Milk), Butterfat (from Milk), Emulsifier (Sunflower Lecithin), Salt, Flavourings, Milk Chocolate contains Milk Solids 14% minimum and Vegetable Fat in addition to Cocoa Butter</p> <p>Dietary Information Suitable for Vegetarians For allergens see ingredients in bold May Contain Cereals Containing Gluten Contains Milk Free From Artificial Colours Free From Artificial Flavours Free From Artificial Preservatives</p>		Per 100g	Per serving**	Reference Intake*	% RI*	Energy	2011kJ	524kJ	8400kJ	-	480kcal	125kcal	2000kcal	6%	Fat	20.8g	5.4g	70g	8%	of which: saturates	11.2g	2.9g	20g	15%	Carbohydrate	68.3g	17.8g	260g	7%	of which: sugars	59.0g	15.3g	90g	17%	Fibre	1.1g	0.3g	-	-	Protein	4.2g	1.1g	50g	2%	Salt	0.30g	0.08g	6g	1%	✓	✓	✓	✓
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Store disclaimer	<p>Important Information</p> <p>The above details have been prepared to help you select suitable products. Products and their ingredients are liable to change.</p> <p>You should always read the label before consuming or using the product and never rely solely on the information presented here.</p> <p>If you require specific advice on any Sainsbury's branded product, please contact our Customer Careline on 0800 636262. For all other products, please contact the manufacturer.</p> <p>This information is supplied for your personal use only. It may not be reproduced in any way without the prior consent of Sainsbury's Supermarkets Ltd and due acknowledgement.</p>				

Annex No 7. Allergen labelling – restaurants and cafes

Latvia

All the photos taken on 25 April, 2017. The original language is Latvian, translation done to English and can be seen in discussions in the article.

<i>Restaurant, cafe</i>	<i>Allergen labelling</i>
Burga, http://www.burga.lv . Accessed April 25, 2017.	Should request the waiters for the menu with the list of allergens
Milti, http://miltibistro.lv . Accessed April 25, 2017.	At the end of menu statement "The food may contain allergens – fish, egg, milk, gluten, nuts, soy, celery, mustard, sesame seeds, crustaceans and their products"
Rossini, http://www.rossini.lv/rossini_riga.html . Accessed April 25, 2017.	Ingredients of products stated, no different listing of allergen ingredients
Tinto, https://www.tinto.lv/english . Accessed April 25, 2017.	Allergen list with numbers and present allergen number given next to food

France

All the photos taken on 25 April, 2017. The original language is French or English, in case of French translation done to English and can be seen in discussions in the article.

<i>Restaurant, cafe</i>	<i>Allergen labelling</i>
Kozy, http://www.kozy.fr/menu/ . Accessed April 25, 2017.	Notice to gluten free food, ingredients of products stated, no different listing of allergen ingredients
Carette, http://www.carette-paris.fr . Accessed April 25, 2017.	Ingredients of products stated, no distinguished allergens
Café de Flore, http://cafedeflore.fr/menu/ . Accessed April 25, 2017.	For some of the foods ingredients of products stated, no distinguished allergens
PAUL, http://www.paul.fr/fr/ . Accessed April 25, 2017.	At the bottom of the menu it is stated that menus with allergen information present should be asked in the café

Annex No 8. Allergen labelling – home delivery

Latvia

All the photos taken on 26 April, 2017. The original language is Latvian, translation done to English and can be seen in discussions in the article.

Restaurant	Allergen information
Tokyo city, http://www.tokyocity.lv/spisok-product/Ris-Lapsha.html . Accessed April 26, 2017.	<p>RĪSI AR VISTU UN DĀRZEŅIEM</p> <p>6.90 € 0</p> <p>Informācija par alergēniem: kvieši, selerija, rieksti, sojas, sezams</p>
Lulu Pica, https://www.lulu.lv/picas . Accessed April 26, 2017.	 <p>Desu pica</p> <p>Picas mērce, siers, salami desa.</p> <p>Ø 45 cm 15.49 EUR</p> <p>Cik picas tu apēdīsi? 1</p> <p>Klasiskā</p> <p>PIEVIENOT PASŪTĪJUMAM</p>

France

All the photos taken on 26 April, 2017. The original language is French, translation done to English and can be seen in discussions in the article

Restaurant	Allergen information
Allo Resto, https://www.alloresto.fr/restaurant-livraison-a-domicile/restaurant/le-pecharmant/courbevoie/particuliers/carte?rg . Accessed April 26, 2017.	<p>Panier French paradox 25,00 € </p> <p>3 pour 2</p> <p>Plateau repas French paradox, salade de gésier déglacé au vinaigre de framboise, toast de foie gras, noix et tomate, confit de canard, gratin de pomme de terre, haricots verts, salade de fruits frais</p>
Deliveroo, https://deliveroo.fr/en/menu/paris/paris-16eme-victor-hugo/grill-bar?day=today&rpos=7&time=1145 . Accessed April 26, 2017.	<p>Most Popular</p> <p>Classique Steak, salade, tomates, oignons, cornichons, mayonnaise, ketchup €10.00 +</p> <p>Cheese Burger Steak, fromage parvé, salade, tomates, oignons, cornichons, mayonnaise, ketchup €10.50 +</p>