

## Full ingredients declaration in the organic food trade

### - Introduction -

The complete declaration of ingredients is a tradition in the health food industry, practised by the majority of companies. To underpin this, the general meeting of the Organic Processors and Traders Association e.V.<sup>1</sup> decided in April 2004 to require that all ingredients and additives in packaged foods have to be declared. The manufacturing companies in BNN, by committing themselves to the adoption of this full declaration decision, agree to distribute only products in the organic food trade that meet this requirement. The wholesale companies in BNN indicate in their price lists (via an abbreviation on each product), whether the full declaration is fulfilled.

**The full declaration goes beyond the legal requirements and provides customers in the organic food trade with more transparency.**

The full declaration requires that all the ingredients used must be shown. This is especially true for composite ingredients such as herbs and spice mixes and also for additives: Compound ingredients must, according to Food Information Regulation (VO (EU) No 1169/2011, LMIV) – with some exceptions - only be broken down when they comprise more than 2% of the total weight of the product.

The full declaration also calls for the indication of vegetable and animal oil/fat raw materials. According to LMIV, from 13.12.2014, vegetable raw materials specifically used to produce refined vegetable fats must be indicated; for refined animal fats and oils, it is still permitted under European law, not to concretely specify the origin (species).

Based on a decision of the BNN Advisory Board clearly visible labelling of **deliberately added alcohol** in a composite food in 2014 will be required for the first time: While alcohol is a high quality ingredient for some consumers, which may even be associated with a particular taste, others wish or need to avoid alcohol. There are foods where it is not immediately

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<sup>1</sup> In 2013 „BNN Einzelhandel“ and „BNN Herstellung und Handel“ allied as „BNN - Association of Organic Processors, Wholesalers and Retailers“

apparent that they contain an alcoholic ingredient, for example, some sweets. For such products not only is the legal requirement that the alcoholic ingredient is listed in the list of ingredients to be fulfilled, but the alcoholic content in % by volume should also added below the ingredients list where it will be easy to find. The implementation of this new requirement is to take place with the next label print run.

The full declaration closes gaps in the food labelling laws. The listings in organic food shops differ markedly in terms of transparency of the ingredients used when compared to the organic product ranges in conventional trade outlets. Especially customers with an allergy or intolerance benefit from labelling with complete transparency in the organic food outlets, because it recognizes which potentially critical ingredients are contained in a product. The full declaration also meets the expectations of the majority of customers in the organic food trade.

## - Implementation -

In 2004, the member companies of BNN - Organic Processors and Traders Association e.V. decided to include a comprehensive list of all ingredients on all packaged foods that they manufacture and distribute.

Processing aids must be labelled in accordance with the provisions of Regulation (EU) No. 1169/2011 only when they are on the list of the 14 main allergens. All other processing aids need not be specified in the list of ingredients either under EU law or according to the BNN full ingredients declaration decision.

For example, if diatomaceous earth is used as a filter aid in the filtration of edible oil, this need not appear on the packaging. .

The following table lists in detail the differences between labelling requirements under the food law and the BNN full ingredients declaration.

	<b>Declaration according to food law</b>	<b>Declaration according to the BNN decision</b>
<b>Flavours</b>	<p>Depending on the type, Regulation (EC) No 1334/2008 requires a declaration as:</p> <ul style="list-style-type: none"> <li>- Flavour extract</li> <li>- Natural flavouring</li> <li>- Flavouring.</li> </ul> <p>For organic food only flavouring extracts and natural flavours are permitted. A more specific indication is possible. Example: Natural raspberry flavour</p> <p>The processing aids used in the flavours need not be specified, unless required by the allergen labelling under Regulation (EU) No. 1169/2011.</p>	<p>It is recommended to characterize the aroma used in accordance with the flavour recommendations of the BNN (See <a href="http://n-bnn.de/downloadbereich">http://n-bnn.de/downloadbereich</a>).</p> <p>The processing aids used in the flavours need not be specified, unless required by the allergen labelling under Regulation (EU) No. 1169/2011.</p>

	<b>Declaration according to food law</b>	<b>Declaration according to the BNN decision</b>
<b>Herbs and Spices</b>	<p>When using different herbs and spices a collective term is possible, provided it does not exceed 2% of the final weight.</p> <p>Example: thyme, oregano and basil can be listed as "herbs" in the ingredients list.</p>	<p>Herbs and spices have to be listed individually.</p> <p>If this is not possible for reasons of space, publication of all the ingredients shall be in the product point of sale material or in the Internet.</p>
<b>Vegetable fats</b>	<p>When using various fats of vegetable origin, it was possible under the food labelling regulation, to indicate these using a collective name. Due to the transition rules of LMIV such products can still be sold after the 13.12.2014.</p> <p>Example: palm oil and coconut oil can be listed in the ingredients as "Vegetable fats".</p> <p>Exceptions: soybean, peanut, sesame and nut oils need to be listed individually.</p> <p>Example: If the product contains soybean oil, it may be listed, for example, as "vegetable fat (contains soy)"</p>	<p>All the vegetable fats are listed with their individual names in the list of ingredients. The exact vegetable fat used is explicitly named.</p>
<b>Refined oils and fats of animal origin</b>	<p>The use of refined oils or refined fats of animal origin may be referred to as "oil" or "fat" in the list of ingredients, together with either to "animal" or the indication of specific animal origin.</p> <p>Example: lard and beef tallow may be listed in the ingredients as "Animal fats".</p>	<p>All animal fats used are listed with their individual name in the list of ingredients. The exact animal fat used is explicitly named.</p>

	<b>Declaration according to food law</b>	<b>Declaration according to the BNN decision</b>
<b>Additives</b>	<p>The additives used in the final product must be listed in the ingredients list.</p> <p><u>Exceptions:</u> Where an additive occurs via a single ingredient in the final product and has no technological function anymore, it needs not be listed.</p> <p>Example: nitrites in salami, which is a topping on frozen pizza</p>	<p>All additives used must be listed in the ingredients list, even if they occur for example as a compound ingredient in the food.</p>
<b>Composite ingredients making up less than 2% of the recipe</b>	<p>Composite products making up less than 2% of the total product need not be listed with the individual ingredients when the composition of the compound ingredient is governed by a Union regulation or when they are spice or herb mixtures. This ruling does not apply if one of 14 major allergens is present or if overruled by the regulations for the labeling of additives. The ingredients of a composite ingredient also do not have to be listed if the composite ingredient is a food for which a list of ingredients is provided (e.g. Cheese or fermentation vinegars derived exclusively from a single basic product).</p> <p>Example: Grain Burger Whole grain oats, whole wheat flakes, mixed herbs, nutritional yeast</p> <p>If the proportion of the herbal mixture is below 2%, no list of individual ingredients must be provided.</p> <p>Exceptions: If the composite ingredient contains one of the 14 major allergens, this needs to be explicitly named.</p> <p>Example: Grain Burger Whole grain oats, whole wheat flakes, mixed herbs (contains mustard), nutritional yeast</p>	<p>Basically, all the ingredients are listed, including those of composite products (even for proportions less than 2%, and even for herbs and spices). The exception is for compound ingredients if they are a food for which a list of ingredients is provided (e.g. Cheese or fermented vinegar made from a single raw material).</p> <p>Example: Grain Burger Whole grain oats, whole grain wheat flakes, herb mixture (thyme, oregano), nutritional yeast</p>

	<b>Declaration according to food law</b>	<b>Declaration according to the BNN decision</b>
<b>Alcohol</b>	Regulations exist on the labelling of alcohol drinks, but not for other foodstuffs containing alcohol. Alcoholic ingredients in foods with multiple ingredients must be indicated in the list of ingredients, separate and searchable information is not provided.	If alcohol is used as an ingredient, for example, liquor or wine in confectionary, this should be readily apparent to the customer. Therefore, in these cases the alcohol content must be specified below the list of ingredients as "xy vol% alcohol". A detailed declaration of the alcoholic ingredient ("positive-claim") is feasible, for example, "Xy vol% alcohol as Rum".

## - Identification in the price lists of producers / wholesale -

1 = Conforms with the full declaration Order of BNN

2 = Does not conform with the full declaration Order of BNN