

BNN Full Ingredients Declaration

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Transparency and with it, the complete declaration of ingredients is tradition in the organic food industry. Almost all products offered in organic shops feature a list of all ingredients that goes beyond the legal requirements. The Full Ingredients Declaration agreed at the BNN General Assembly¹ back in 2004 played a key role in making this the case.

Declaration according to food legislation

The Regulation on food information to consumers (Regulation (EU) No 1169/2011) leaves gaps in the listing of certain ingredients. For example, there is no requirement to break down compound ingredients that make up no more than 2% of the final weight – with exceptions – or to specify the origin (type of animal) of refined animal oils and fats. At the same time, additives with no technological function in the final product can end up undeclared in the product through individual compound ingredients.

Alcohol content does not have to be listed in solid foods. However, if added to a product as an ingredient, alcohol must be included in the list of ingredients. It is not immediately clear that some foods, such as some sweets, contain an alcoholic ingredient.

Processing aids must be labelled in accordance with the provisions of Regulation (EU) No. 1169/2011 only when they contain one of the 14 main allergens. All other processing aids don't need to 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, it doesn't appear on the packaging.

¹ General Assembly of the Bundesverbands Naturkost Naturwaren (BNN) Herstellung und Handel e.V. In 2013, the two associations BNN Einzelhandel e.V. and BNN Herstellung und Handel e.V. merged to form Bundesverband Naturkost Naturwaren (BNN) e.V.

BNN resolution on the Full Ingredients Declaration

The Full Ingredients Declaration implies that all the ingredients used have to be identified and requires information in the following areas:

The breakdown of compound ingredients such as herbal and spice mixes as well as the list of additives in compound ingredients and precise specification of the flavourings used. Information on type of animal or origin of refined animal fats and oils as well as easy-to-locate labelling of alcohol content in vol. % of deliberately added alcohol in compound foodstuffs².

The Full Ingredients Declaration thus surpasses legal requirements and closes gaps in labelling legislation to offer customers in the organic food trade greater transparency.

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 manufacturing companies in BNN, by committing themselves to the adoption of this full ingredients 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 for each product), whether the Full Ingredients Declaration is fulfilled.

Identification in the price lists of producers / wholesale

1 = Complied with the full ingredients declaration Order of BNN

2 = Not complied with the full ingredients declaration Order of BNN

² The labelling of deliberately added alcohol in compound foodstuffs is based on a resolution by the BNN Board of Trustees from 2014.

Implementation

The following table lists in detail the differences between labelling requirements under the food law and the BNN Full Ingredients Declaration.

	Declaration according to food law	BNN Full Ingredients Deklaration
Additives	Additives used in the final product must be listed in the ingredients list. When an additive gets into the final product over a compound ingredient where it has no technological function anymore, it doesn't need to be listed.	All additives must be listed in the ingredients list, even when they get into a final product through a compound ingredient.
Example	Frozen salami pizza: wheat flour, water, mozzarella cheese, tomato puree, <u>salami</u> (<u>pork, pork fat, salt</u>), yeast, oregano, salt	Frozen salami pizza: wheat flour, water, mozzarella cheese, tomato puree, <u>salami</u> (<u>pork, pork fat, salt, sodium nitrate</u>), yeast, oregano, salt
Flavourings	Flavourings should be marked in the ingredients list using the term "flavouring". Any more specific information is voluntary. Only flavouring preparations and Natural flavours from the source material referred to (natural <X> flavouring, pursuant to Art. 16 (2) (3) <u>and</u> (4) of Reg. 1334/2008) are allowed to be used in organic food.	It is recommended to characterize the flavouring used in accordance with the flavour recommendations of the BNN (See http://n-bnn.de/downloadbereich).
Example	Raspberry yogurt: yogurt, sugar, raspberry puree, <u>flavouring</u>	Raspberry yogurt: yogurt, sugar, raspberry puree, <u>natural raspberry flavouring</u>
Refined oils and fats of animal origin	The use of refined oils or refined fats of animal origin (e.g. Lard, beef tallow) may be referred to as "oil" or "fat" in the list of ingredients and either by adding the word "animal" or the indication of the specific animal origin.	All animal fats used are listed with their individual names in the list of ingredients. The exact animal fat used is explicitly named.
Example	Fries: potatoes, <u>animal fat</u> , sunflower oil	Fries: potatoes, <u>beef tallow</u> , sunflower oil
Herbs and Spices	When herb and spice mixes are used and they don't exceed 2% of the final weight , the single ingredients of the blend don't have to be listed. <u>Exceptions:</u> If the blend contains one of the 14 major allergens , it needs to be explicitly named.	Herbs and spices have to be listed individually. If this is not possible due to a lack of space on the packaging, publication of all the ingredients shall be made in the point of sale material or online.
Example	Grain Burger: Whole grain oats, whole wheat flakes, <u>herb mixture</u> , nutritional yeast	Grain Burger Whole grain oats, whole grain wheat flakes, <u>herb mixture</u> (<u>thyme, oregano</u>), nutritional yeast

	Declaration according to food law	BNN Full Ingredients Deklaration
Compound ingredients making up less than 2% of the weight	<p>If a compound ingredient makes up less than 2% of the weight the single ingredients don't need to be listed if the composition is regulated by a union law (e.g. chocolate) or if the compound ingredient is a herb and spice mix.</p> <p><u>Exceptions:</u> If the composite ingredient contains one of the 14 major allergens, it needs to be explicitly named or if overruled by the regulations for the labeling of additives.</p> <p>The ingredients of a compound ingredient also do not have to be listed if it is a food for which a list of ingredients is not foreseen (e.g. Cheese or fermentation vinegars derived exclusively from a single basic product).</p>	<p>Basically, all the ingredients are listed, including those of compound ingredients (even for proportions less than 2%, and for herb and spice mixes). Except for compound ingredients if it is a food for which a list of ingredients is not foreseen (e.g. Cheese or fermentation vinegars derived exclusively from a single basic product).</p>
Example	<p>Oat cookies: Whole grain oats, sugar, <u>1,9% chocolate (contains soya lecithin)</u>, vanilla, salt</p>	<p>Oat cookies: Whole grain oats, sugar, <u>1,9% chocolate (cocoa butter, cocoa mass, sugar, soya lecithin)</u>, vanilla, salt</p>
Alcohol	<p>Regulations exist on the labelling of alcoholic 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 easy-to-find information is not intended.</p>	<p>When alcohol is used as an ingredient (e.g. liquor or wine in confectionary) it should be easy to spot for the customer. In these cases, must the alcohol content therefore be specified below the list of ingredients as "xy vol% alcohol". A detailed declaration of the alcoholic ingredient ("positive-claim") is also possible (e.g. "xy vol% alcohol from Rum").</p>