

Point 7 - Wine Labelling: towards a homogeneous interpretation of rules on e-labels
Results from the Survey sent to Member States on national interpretation

Request: Please provide the interpretation being implemented in your country in the first column and add any comments in the second that may enhance the understanding of the decision taken.

MS	Heading of QR code	Comments
AT	‘Nutrition value and Ingredients’ “Nährwert und Zutaten”	in case both of them are in the QR-Code, otherwise only one of these expressions
CZ	Nutrition declaration: QR* , or Nutrition declaration listed on QR* Ingredient list: QR , or Ingredient list listed on QR	Heading of the QR code must be as short as possible
DE	If only list of ingredients: ‘Zutaten’ or similar; If only nutrition declaration: ‘Nährwerte’, ‘Nährwertangabe’, ‘Nährwertverzeichnis’ or similar; If both list of ingredients and nutrition declaration: both ‘Zutaten’ and ‘Nährwerte’, or similar.	In German <u>or other EU-language</u>
DK	‘Ingredients and nutritional declaration’ Where the information provided by electronic means is the list of ingredients, a heading, as referred to in Article 18(1) of the FIC Regulation , must be used. If the nutritional declaration is also included this must also appear in the heading of the QR code , following from FIC Article 13(1).	The presentation of a QR code should be clear for the consumers regarding its content i.e., the compulsory information that is presented by electronic means. <u>If another expression than nutritional declaration is used it the legality of the expression will be concretely assessed</u>
ES	‘Ingredients’	Reg. 1169/2011 establishes <u>the obligation to head the list of ingredients with the word ingredients</u> , but there is no equivalent <u>obligation for the nutritional information</u> . There is no legal basis for demanding that the words “nutrition declaration” be included in the heading of the QR code.

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FR	<ul style="list-style-type: none"> • ingrédients et déclaration nutritionnelle • ingredients & nutrition • ingredients/nutrition 	<p>Les autorités françaises souhaiteraient que le QR code puisse, à l'avenir, être identifié par un symbole ou un pictogramme.</p>
FI	<p>If the list of ingredients and the nutrition declaration are presented in electronic form, for example by using a QR code, the QR code should include a mention of the information it contains in Finnish and Swedish.</p>	<p>The mandatory labelling under the Food Information Regulation, the list of ingredients and the nutrition declaration for example, should be <u>in national languages</u> (Finnish, Swedish) in Finland.</p> <p>We understand the challenges with national languages and we <u>would support a common and understandable label</u>. The label should be informative for all parties, above all consumers.</p> <p>Example: the letter I (capital letters) in the middle of the QR-code.</p>
GR	<p>Regarding the heading of the QR code, Greece has not defined a specific one.</p> <p>'Nutrition declaration/Ingredients' mostly used</p>	<p><u>Multinational companies involved with QR codes in our country use a whole sentence "ingredients, nutritional facts, recycling"</u>.</p> <p>Greece requests a harmonised approach to the issue from all MS.</p>
HU	<p>'nutrition declaration and ingredients'</p>	<p>Language regime set out in Art. 121 applies (the heading should be written in one or more official language of the Union).</p> <p>Open to more flexible interpretations</p>
IT	<p>'ingredienti'</p> <p>The indication "ingredients" in one of the official languages of the European Union sufficient to inform the consumer about the presence, within the QR code, of the list of ingredients, according to the guidance provided by the European Commission.</p>	<p>Following the publication of answer No. 38 of the European Commission's Q&A document, there are divergent interpretations, resulting in a disharmonization of EU rules, and difficulties for European producers and the competitiveness of the sector.</p> <p>Italy considers QR code identification by means of symbols or pictograms to be the way to ensure to the consumer the right access to mandatory informations.</p>
LT	<p>Heading with the word 'ingredients'</p> <p>On the market, labels usually include both the list of ingredients and the nutrition declaration under a QR code.</p>	<p>In accordance with question 38 of the COMMISSION NOTICE C/2023/1190 of 24.11.2023 heading with the word 'ingredients' is used.</p>

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PL	<p>Heading, which consists of or includes the word “ingredients”</p> <p>Reference to the nutrition declaration is recommended</p> <p>Our control authorities recommend that the heading of QR code should also include a reference to the nutrition declaration when such information is provided by electronic means.</p>	<p>Since the regulation only requires that the list of ingredients should be preceded by an appropriate heading (which consists of or includes the word “ingredients”), there is <u>no legal basis for imposing an obligation to precede the QR code with a heading referring to the nutrition declaration</u> when the information is provided by electronic means. (Most food operators do it).</p> <p>It would be <u>beneficial to the consumer if the QR code was preceded by a heading referring to the nutrition declaration</u>. The consumer would then receive a clear indication that under the QR code there is also information on the nutrition declaration of the product.</p>
PT	<p>Terms in the heading of the QR code referring to the information provided by electronic means: ingredients, nutrition, or both, with many options accepted:</p> <p>Declaração nutricional: <u>um</u> dos seguintes termos, ou similares: <i>Declaração Nutricional; Informação Nutricional; Tabela Nutricional; Composição Nutricional; Declaração de Valor Nutricional; Valores Nutricionais; Nutricional;</i></p> <p>Lista de ingredientes, <u>um</u> dos seguintes termos ou similares: <i>Lista de Ingredientes; Composição dos Ingredientes; Conteúdo dos Ingredientes; Declaração dos Ingredientes; Ingredientes Utilizados; Ingredientes.</i></p> <p>Declaração nutricional e lista de ingredientes num único QR code: sempre uma combinação dos termos previstos para a declaração nutricional e lista de ingredientes ou similares. <i>Declaração Nutricional e Lista de Ingredientes; Nutricional e Ingredientes; Informação Nutricional e Composição dos Ingredientes.</i></p>	
SE	<p>Some word/words that makes the consumer understand where to find the full nutrition declaration.</p> <p>For example “nutrients”, “nutritional information”, “nutrition declaration”, “nutrition values” or equivalent.</p>	<p>When <u>the nutrition declaration</u> is provided through a QR code, it is not regulated which word to use for the heading but it <u>must be identified in some way</u> (article 119(4) of CMO Regulation) for consumer to understand where to find the full nutrition declaration.</p> <p><u>The word ‘ingredient’s alone is not enough for the consumer to understand that the QR code leads to both a list of ingredients and a complete nutrition declaration.</u></p>