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White Paper

EU Food Allergen Labeling

Printing labels that comply with EU Regulation
N° 1169/2011

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Overview

As of December 2014, all European nutrition labels must list and identify potential allergens in accordance with EU Regulation N° 1169/2011. This regulation helps customers make informed decisions about the ingredients and nutrition of the food and beverages they consume. Food manufacturers, business food operators and distributors must clearly mark and emphasize all allergens in the ingredient list.

For years, BarTender® has had the ability to create and design labels that comply with this regulation. Now with your installation of BarTender, Seagull provides an intuitive, easy-to-use label template that helps you meet these food labeling requirements and produce consistent, compliant labeling throughout your industry.

The BarTender EU Allergen label template is completely customizable and features:

- Automated emphasis and formatting of allergens in your ingredient list.
- Customizable list of allergens, allowing easy modification should the regulation be updated or you need to comply with similar geographic regulations.
- Simple design that allows you to design labels to match your company's marketing and production needs.
- Seagull Scientific's legendary technical support.

For more information about EU Regulation N° 1169/2011 and food labeling requirements, visit the Seagull Scientific Food Industry page:

<http://www.seagullscientific.com/label-software/food-and-beverage.aspx>

Steps to Implement EU Allergen-Compliant Labeling

BarTender's sample document can be downloaded from Seagull Scientific's Food Industry page:

<http://www.seagullscientific.com/label-software/food-and-beverage-fic.aspx>

The sample template includes a very simple design for the sole purpose of letting you format and brand your label as you see fit. You can manually replace the sample ingredients with your own, or more likely, retrieve your ingredient list from a database, spreadsheet or ERP system.



Use of the sample BarTender document requires the Professional edition of BarTender or higher.

Update the Allergen List

BarTender's sample document contains a list of 30 common allergens, as defined by EU Regulation N° 1169/2011. This allergen list is intended to be a starting point for the allergens used in your production environment, and is stored in an external txt file, Allergen.txt. A list of these included allergens are also listed in [Appendix A](#) of this white paper.

NOTE: You are fully responsible for maintaining the Allergen list and complying with the EU Regulation. The allergens included with this sample document may not comprehensively cover all allergens derived from the categories defined by the EU Regulation. Updates to the installed allergen list should include all variations of the allergens used in your company, including spelling variations (e.g. kamut vs kamult), translated allergen names, plural forms of the allergens (e.g. egg vs eggs) and/or specific types of an allergen (e.g. salmon, herring, mackerel and squid all fall under the category "fish").

To modify the allergen list:

1. Locate the file Allergen.txt on your computer and open it in the text editor of your choice. By default, this file is installed in the same directory as the BarTender document.
2. Enter your allergens, one per line in the text file.
3. Save the file and close out of the text editor.

Modify the Allergen Formatting

The Food Information to Consumers (FIC) regulation mandates that all allergens be clearly highlighted and not lost in a block of text with lots of ingredients. Bold text is the preferred highlighting method, but companies may use other methods to highlight the allergen text. Manufacturers may underline, bold, italicize or use a combination of all three.

By default, the sample document bolds the ingredients. If you wish to modify this style, follow these steps:

1. In the Data Sources Toolbox pane, expand the **Named Data Sources** node.
2. Double-click on the named data source entitled "AllergenStyle". The **Named Data Sources** dialog opens.
3. With the "AllergenStyle" named data source still selected, enter one of the following accepted formatting inputs:
 - **Bold**
 - ***BoldItalic***
 - **BoldUnderline**
 - ***BoldItalicUnderline***
 - *Italic*
 - *ItalicUnderline*
 - Underline

Note that these entry values are case sensitive and must match the case above. If an unsupported value is entered, the allergen will default to bold formatting.

4. Click **Close** to close the Named Data Sources dialog and return to your template.

Enter Ingredient List

There are two ways to enter your ingredients into the sample label: you can either manually input your ingredients or import them from an external data file.

Entering Ingredients Manually

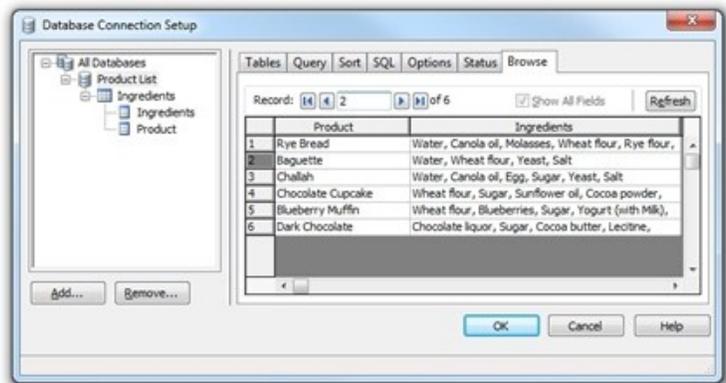
By default, the sample label is set up so that you manually enter your ingredients into your document.

1. In the Data Sources Toolbox pane, expand the **Named Data Sources** node.
2. Double-click on the named data source entitled "Ingredients". The **Named Data Sources** dialog opens.
3. With the "Ingredients" named data source still selected, enter the ingredients in your product, separated by commas.
4. Click **Close** to close the Named Data Sources dialog and return to your template.

Importing Ingredients from a Database

Preparing Your Database

Once you decide that you'd like to automatically populate your label with data from a data file, you must first create a data file that is supported. BarTender supports the following types of database platforms: delimited text files, Access databases, Excel spreadsheets, SQL Server databases, Oracle databases and SAP IDoc files. In addition, BarTender allows you to connect to other databases, provided that you have an OLE DB or ODBC driver installed on your system.



At a minimum, your database for this label must contain two fields: Product and Ingredients. The **Product** field includes the product name, identifier and/or description of the product so that you can easily differentiate products from each other. The **Ingredients** field contains a list of all the ingredients in the product, separated by commas.

NOTE: Included with the sample document is a text file entitled "IngredientList.txt". If you do not already have a database file in place, use this file as a starting point for your own database file using the directions below.

Connecting to Your Database

1. From the **File** menu, select **Database Connection Setup**. The **Add Database Connection Wizard** opens.
2. Work your way through the wizard, specifying the database platform, file location and tables you wish to use. The screens you encounter will vary based on the database platform you are using.
3. At the end of the wizard, click **Finish**.
4. Click the **Browse** tab to verify that your data was imported correctly.
5. Click **OK** to close the Database Connection Setup dialog.

Reading Ingredients from Your Database

1. In the Data Sources Toolbox pane, expand the **Named Data Sources** node.
2. Double-click on the named data source entitled "Ingredients". The **Named Data Sources** dialog opens.
3. With the "Ingredients" named data source still selected, click the **Properties** icon  next to **Type**. The **Data Source Wizard** opens.
4. For **Type**, select **Database Field**. Click **Next**.
5. For **Field Name**, select **Ingredients**. Click **Finish** to close the Data Source Wizard.

6. Click **Close** to close the Named Data Sources dialog and return to your template.

Customize Your Label

Depending on the size and distribution of your food label, one or more additional pieces of information may need to be added to your label in order to comply with EU Regulation N° 1169/2011. For example, you may want to include the name of the food, the quantity of food, the 'use by' date or the business name. Note that this is not a full list of the mandatory information, and you should refer to the regulation for the detailed requirements.

Because this information will vary with every company, the sample label template does not include these pieces of information. You will need to add text objects, images and/or other objects to customize the label to meet your company's needs. These objects can be added anywhere on the label, provided that the ingredient list is clearly visible.

The font, font color, and text size for the ingredient list are stored in an HTML object on the template. To change these styles:

1. In the Data Sources Toolbox pane, expand the **Named Data Sources** node.
2. Double-click on the named data source entitled "IngredientStyle". The **Named Data Sources** dialog opens.
3. Modify the CSS as desired.
4. Click **Close** to close the Named Data Sources dialog and return to your template.

Appendix A: Allergen List

The EU Regulation N° 1169/2011 has defined several categories of allergen. Any food product in a formulation that appears in the EU's list must be highlighted on the package label's ingredient list.

- Cereals containing gluten, including wheat, rye, barley, oats, spelt, and kamut or their hybrids
- Crustaceans
- Eggs
- Fish
- Peanuts
- Soybeans
- Milk
- Nuts, namely almonds, hazelnuts, walnuts, cashews, pecans, Brazil nuts, pistachios, macadamia and Queensland nuts
- Celery
- Mustard
- Sesame seeds
- Sulphur dioxide and sulphites at concentrations greater than 10mg/kg or 10mg/liter
- Lupin
- Molluscs

Related Documentation

From the European Commission

- Food labelling - EU Rules 2014

http://ec.europa.eu/food/food/labellingnutrition/foodlabelling/proposed_legislation_en.htm

From Seagull Scientific

- EU N° 1169/2011 (Food Information to Consumers) allergen labeling

<http://www.seagullscientific.com/label-software/food-and-beverage-fic.aspx>