BarTender®

BY SEAGULL SCIENTIFIC

EU Food Allergen Labeling

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

Contents

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 labels.

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

- Automated emphasis and formatting of allergens in your ingredient list.
- Configurable 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.
- Support for multiple languages, including English, Dutch, French, German, Italian and Spanish.
- Seagull Scientific's legendary technical support.

For more information about EU Regulation N°1169/2011 and food labeling requirements, visit the Seagull Scientific EU Food Allergen Labeling (FIC) Regulation page:

http://www.seagullscientific.com/label-design-and-printing/regulations-standards/eu-food-allergens-fic

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-design-and-printing/regulations-standards/eu-food-allergens-fic

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.

Ingredients:
Water, Canola Oil, Molasses, **Wheat** flour, **Rye** flour, **Milk** powder, Caraway, Yeast, Salt

Rye Bread

Ingredients:
Water, Canola Oil, Molasses, *Wheat* flour, *Rye* flour, *Milk* powder, Caraway, Yeast, Salt

6 141419 999968

XYZ Bakery

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

Select Your Language

In order to accurately identify the allergens in your ingredient list, you must specify what language(s) your ingredient list is in. To do so:

1. In the Data Sources Toolbox pane, expand the **Named Data Sources** node.
2. Double-click on the named data source entitled "LanguageID". The **Named Data Sources** dialog opens.
3. With the "LanguageID" named data source still selected, replace the data with the ISO-639 code that corresponds to one of the six languages supported by the sample document. See Appendix A of this document for more information.
4. Click **Close** to close the Named Data Sources dialog and return to your template.

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 text file, Allergens.txt. A list of these included allergens are also listed in Appendix B of this white paper.

> **NOTE:** You are fully responsible for maintaining the allergen and exceptions list and complying with the EU Regulation. The allergens (and exceptions) 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 Allergens.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. In the file, find the line containing the language of your choice. Enter your ingredients for your language, separated by commas.
3. Save the file and close out of the text editor.

Exceptions

Some multi-word ingredients may contain an allergen in their name, but the ingredient itself is not an allergen. Examples include "coconut milk" and "cocoa butter." In these cases, you can define exceptions, so that BarTender will not highlight any part of the ingredient, even if its name includes an allergen.

To add an exception:

1. Locate the file Exceptions.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. In the file, find the line containing the language of your choice. Enter your exceptions for your language, separated by commas.
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 so that they are easily identified in an ingredient list. 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***
   - *Italic*
   - BoldUnderline
   - *ItalicUnderline*
   - ***BoldItalicUnderline***
   - 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.
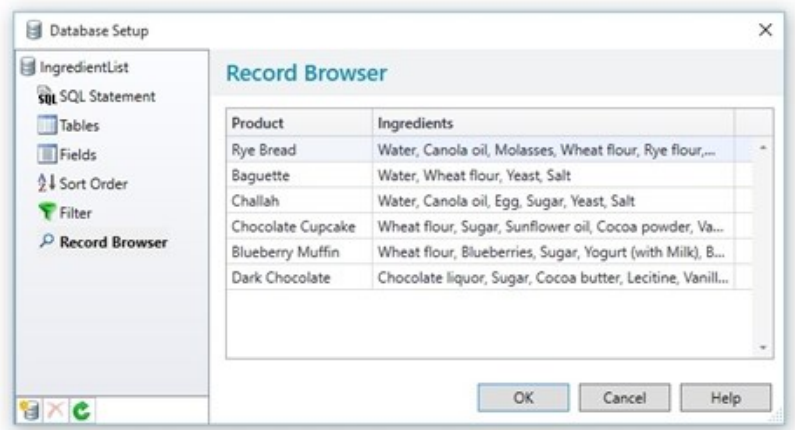
Entering Ingredients Manually

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.

Reading 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 **Database Setup 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. In the left Navigation Pane, click **Record Browser** to verify that your data was imported correctly.

5. Click **OK** to close the Database 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.

Configure 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 configure 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.

WARNING: Do not make any changes to the text object containing the ingredient list without the help of a BarTender representative. This object contains advanced VBScripts that correctly format the

allergens. If these values are modified, your label may no longer conform to the specifications detailed in EU Regulation N° 1169/2011.

Considerations for Modifying an Existing Document

In some cases, you may already have a BarTender document designed for your product. Even in this case, you can adapt your existing design and copy over parts of the sample document so that it conforms to the specifications detailed in EU Regulation N° 1169/2011.

This chapter walks you through the steps needed to modify an existing BarTender document. Once you have incorporated these steps into your design, you will be able to set a target language, update the allergen and exception lists, and modify the allergen formatting as outlined in the previous chapter.

Prerequisites

The following steps assume that you have these files available for use:

1. Your own BarTender document, already connected to a database containing an ingredient list.
2. BarTender's sample document, EU allergen list and exceptions list, downloadable from Seagull Scientific's Food Industry page:

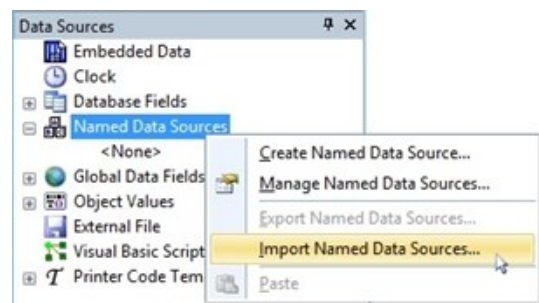   http://www.seagullscientific.com/label-design-and-printing/regulations-standards/eu-food-allergens-fic

Implementation

1) Import Named Data Sources

1. Open the sample document.
2. In the Data Sources Toolbox pane, locate the **Named Data Sources** node.
3. Right-click on the Named Data Sources node and select **Export Named Data Sources**.
4. Enter a file name for your data source list and click **Save**.

This will save the named data sources from the sample document as an XML file so that they can be used in other documents (such as your existing product label).

1. Open your existing document.
2. In the Data Sources Toolbox pane, locate the **Named Data Sources** node.
3. Right-click on the Named Data Sources node and select **Import Named Data Sources**.
4. Browse to the file saved in Step 4, above, and click **Open**.

2) Copy Ingredients Text Box

1. In your existing design, delete the text object that contains your ingredient list.
2. From the sample document, copy the text object. This text object makes use of VBScript and a list of allergens in an external database to automatically emphasize the potential allergens in your ingredient list.
3. Paste this text object into your existing template.

At this point, you no longer need the sample document. You can close it at this time.

3) Create Allergen and Exception Lists

1. Locate Allergens.txt and Exceptions.txt on your computer. By default, these files are installed in the same directory as the sample BarTender document.
2. Copy both files.
3. Paste them into the same directory where your existing document resides.

4) Read 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 the field that contains your ingredient list. Click **Finish** to close the Data Source Wizard.
6. Click **Close** to close the Named Data Sources dialog and return to your template.

Appendix A: Supported Language Table

Language Name	Language ID
Dutch	NL
English	EN
French	FR
German	DE
Italian	IT
Spanish	ES

Appendix B: 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 and -derived products
- Eggs and -derived products
- Fish and -derived products
- Peanuts and -derived products
- Soybeans and -derived products
- Milk and -derived products
- Nuts and -derived products, namely almonds, hazelnuts, walnuts, cashews, pecans, Brazil nuts, pistachios, macadamia and Queensland nuts
- Celery and -derived products
- Mustard and -derived products
- Sesame seeds and -derived products
- Sulphur dioxide and sulphites at concentrations greater than 10mg/kg or 10mg/liter
- Lupin and -derived products
- Molluscs and -derived products

Based on these categories, BarTender's installed allergen list includes the following allergens in six supported languages:

almonds, barley, Brazil nuts, cashews, celery, cream, crustaceans, egg, fish, hazelnuts, kamult, kamut, lupin, macadamia nuts, milk, molluscs, mustard, oats, peanuts, pecans, pistachios, Queensland nuts, rye, sesame seeds, soybeans, spelt, sulphur dioxide, sulphites, tofu, walnuts, wheat

Note that this is not a comprehensive list of all potential allergens. 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), 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").

Related Documentation

White Papers and Manuals

- BarTender Software for FIC Compliance (PDF)
  http://www.seagullscientific.com/label-design-and-printing/regulations-standards/eu-food-allergens-fic

- BarTender Software for Food Labeling (PDF)
  http://www.seagullscientific.com/label-design-and-printing/regulations-standards/eu-food-allergens-fic

External Documentation

To learn more, please visit The European Commission website at *http://ec.europa.eu/index_en.htm*.

- Food information to consumers - legislation (WEB)
  http://ec.europa.eu/food/safety/labelling_nutrition/labelling_legislation

- New EU Food Labelling Rules (PDF)
  http://ec.europa.eu/food/safety/docs/labelling_legislation_infographic_food_labelling_rules_2014_en.pdf