



Section 4, List of Ingredients

In this chapter, you will learn:

- ▶ What is the list of ingredients?
- ▶ What is the order of listing ingredients?
- ▶ How are ingredients, food improvement agents and nutritional additives indicated in the list of ingredients?
- ▶ How are substances that cause allergies or intolerances indicated?
- ▶ When must the amount of an ingredient be indicated, and how is this done?

In this section, you will learn how to write the list of ingredients. The list of ingredients tells what ingredients have been used to produce the food. The list of ingredients must be headed. The header should include the word “ingredients”.

After this section, you will know how to indicate the ingredients contained in non-prepacked and prepacked foods, substances that cause allergies or intolerances, food improvement agents (such as additives) and vitamins and minerals.

Order of listed ingredients

The ingredients of **prepacked foods** are listed in descending order of weight according to the food’s recipe.

Exceptions to this are water and other volatile products used to manufacture the food, such as alcohol. These are indicated in the list of ingredients according to their weight in the finished product.

If the finished product contains at most 5% added water or volatile products, they do not need to be indicated in the list of ingredients. However, this exception does not apply to meat, meat preparations, unprocessed fishery products and unprocessed bivalve molluscs.

There are no specific formal requirements for the list of ingredients in **non-prepacked foods**. What is essential is that the information provided to consumers is correct and verifiable.

For further information, see sections 6.2.9 and 7.1 of the Food Information Guide for Food Supervisors and Food Operators (in Finnish and Swedish).

Ingredients to be included

The list of ingredients must include

- ingredients (such as water, wheat flour, sugar, eggs),
- food improvement agents (such as preservatives (sorbate), strawberry flavor) and
- nutritional supplements (such as vitamin D, calcium)

For further information, see section 6.2.1 of the Food Information Guide for Food Supervisors and Food Operators (in Finnish and Swedish).

Substances and products that cause allergies or intolerances

The following substances and products are listed in annex II of the food information regulation as causing allergies or intolerances, and must be indicated for both prepacked and non-prepacked foods:

- Cereals containing gluten, namely wheat, rye, barley, oats and products made of these cereals
- Crustaceans and products thereof
- Eggs and products thereof
- Fish and products thereof
- Peanuts and products thereof
- Soy beans and products thereof
- Milk and products thereof (including lactose)
- Nut and products thereof
- Celery and products thereof
- Mustard and products thereof
- Sesame seeds and products thereof
- Sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre in terms of the total sulphur dioxide. The concentrations are calculated for products as proposed ready for consumption or as reconstituted according to the producer's instructions.
- Lupin and products thereof
- Molluscs and products thereof

How are these indicated in the list of ingredients?

In **prepacked foods**, substances and products that cause allergies or intolerances are emphasised by a typeset that clearly

distinguishes them from the rest of the list of ingredients, for example by means of the font, style or background colour.

The ingredient causing an allergy or intolerance does not need to be emphasised in the list if it is mentioned in the name of the food, such as in milk powder.

If the ingredient is commonly associated with a specific origin, such as cheese, butter and yogurt with milk, it is sufficient that these words are emphasised in the list of ingredients.

Additives that cause allergies or intolerances must always be indicated using its own name and not simply its E number, such as **soy** lecithin instead of E 322.

Below is an example of the list of ingredients for buns:

Wheat flour, **milk**, sugar, rapeseed oil, **egg**, yeast, salt, emulsifier (**soy** lecithin)

Ingredients that can cause allergies or intolerances must also be indicated for **non-prepacked** foods.

The information may be given in writing or verbally. If the information is given in writing, the ingredients do not need to be emphasised. If given verbally, consumers must be clearly informed that the information is available upon request.

Contamination with substances that cause allergies or intolerances

In some cases, foods may be contaminated, through contact with hands or tools, with ingredients causing allergies or intolerances that are not part of the recipe.

When all possible measures have been taken to remove the risk of contamination but a warning label is still deemed to be necessary for risk management, it is recommended that the packaging includes a separate label:

“May contain traces of xxxx”.

Indicate the substance that can cause allergy or intolerance as accurately as possible using its specific name. In the case of nuts, for example, indicate the type of nut in question as people may be allergic to different nuts.

For example, “May contain traces of hazelnut”

For further information, see sections 6.2.4 and 7.1 of the Food Information Guide for Food Supervisors and Food Operators (in Finnish and Swedish).

Food improvement agents

Food improvement agents refer to additives, aromas and enzymes.

Next, you will learn how these should be indicated in the list of ingredients.

Indicating food additives

Additives are used in food for specific technical purposes, such as to increase its shelf life or improve its colour and structure. The types and amounts of additives that may be used in foods are specified in law.

Food additives are indicated by the name of the category that describes their function (such as preservative, acidity regulator, sweetener), followed by the specific name or E number of the additive.

For example:
acidity regulator (ascorbic acid) OR
acidity regulator (E300)

Exception: The specific name or E number does not need to be indicated for additives that belong to the category “modified starch”.

The **names and identifiers (E numbers) of food additives** are listed in the Regulation (EC) No 1333/2008 of the European Parliament and of the Council on food additives.

The regulation also specifies what additives can be used in certain foods.

The **names of food additive categories** are listed in part C of annex VII to the food information regulation.

If an additive belongs to more than one category, it is named according to its principal function in the food.

For example, ascorbic acid (E 300) may belong to one of three categories of additives based on its intended purpose:

- antioxidant (E 300) or
- acidity regulator (E 300) or
- flour treatment agent (E 300)

Additives that cause allergies and intolerances

Food additives that cause allergies and intolerances must be indicated using their specific names instead of only the category name and E number. For example, soy-based lecithin must be indicated as emulsifier (soy lecithin), not simply as emulsifier (E 322).

Packaging gases

Packaging gases are classified as food additives, but do not need to be indicated in the list of ingredients as they are not present in the finished product. However, food that is packed using packaging gases must include the label “packaged in a protective atmosphere”.

Food colours

The use of certain food colours requires a warning to be included in the label that states the name or E number of the colour(s), followed by “may have an adverse effect on activity and attention in children”.

Colours that require a warning:

- Sunset yellow (E 110),
- Quinoline yellow (E 104),
- Carmoisine (E 122),
- Allura red (E 129),
- Tartrazine (E 102) and
- Ponceau 4R (E 124).

Sweeteners

Foods containing a *sweetener* (such as aspartame and acesulfame K) must include the label “with sweetener”.

Foods containing *sugar and sweetener* must include the label “with sugar and sweetener”.

If the food contains more than one sweetener and sugar, the plural forms are used, as in “with sugars and sweeteners”.

Foods containing *aspartame or aspartame-acesulfame salt* must include the warning label:

“contains aspartame (source of phenylalanine)”, if the aspartame or aspartame-acesulfame salt is indicated in the list of ingredients by its E number.

OR

“contains a source of phenylalanine”, if the aspartame or aspartame-acesulfame salt is indicated in the list of ingredients by its specific name.

Foods with more than 10% added polyols or sugar alcohols (such as xylitol and sorbitol) must include the warning label: “excessive consumption may induce laxative effects”.

Indicating food flavourings

Food flavourings are substances that are not typically consumed as actual food. They are added in foods to give or change a scent or flavour. The use of food flavourings must meet the requirements of EU law. Flavourings are indicated in the list of ingredients with the words “flavouring” or by the specific name of the flavouring, such as ammonium chloride, or a detailed description of the flavouring, such as strawberry flavouring, natural flavouring or natural strawberry flavouring.

There are specific requirements on the use of the term ‘natural’ to describe a flavouring, which are explained in article 16 of Regulation (EC) No 1334/2008 of the European Parliament and of the Council. The same regulation also sets out rules on the use of flavourings in food.

Quinine and *caffeine* used in the production of food must always be indicated by their specific names immediately after the term ‘flavouring’, such as in flavouring (caffeine).

The use of *smoke flavouring* indicated by the name “smoke flavouring(s)” or with a detailed description, such as in “smoke flavouring produced from beech”. Smoke flavourings permitted for use in foods are listed in Commission Implementing Regulation (EU) No 1321/2013.

Indicating food enzymes

Enzymes are proteins that may trigger a certain biochemical reaction. For example, the enzyme lactase breaks down lactose in milk in order to make the product more suitable to people with lactose intolerance.

The use of food enzymes must meet the requirements of EU law.

Enzymes are indicated in the list of ingredients by their specific names if they are used as

additives. Enzymes used as food processing aids do not need to be indicated.

The labelling requirements for enzymes will be clarified once the list of food enzymes permitted in the EU is published as part of Regulation (EC) No 1332/2008 of the European Parliament and of the Council on food enzymes.

For further information, see sections 6.2.8, 6.15 and 6.16 of the Food Information Guide for Food Supervisors and Food Operators (in Finnish and Swedish).

Vitamins and minerals

Fortified foods are foods that include added vitamins, minerals or other nutritionally or physiologically active substances (Regulation (EC) No 1925/2006 of the European Parliament and of the Council).

Vitamins and minerals used to fortify the food are considered to be ingredients and must therefore be named in the list of ingredients. It is recommended that they are named by the names listed in annex XIII of the food information regulation, such as thiamin (not vitamin B1) and riboflavin (not vitamin B2).

Vitamins and minerals may also be indicated using their category name, but this must be followed by a detailed list of the vitamins and minerals in question, for example:

- vitamins (vitamins A, D and E)
- minerals (iron, calcium).

In addition, the quantities of vitamins and minerals and their portion of daily reference intakes must be included in the nutrition declaration. The nutrition declaration is discussed in detail in Section 8 of this guide.

Please note that if a food is fortified with vitamins and minerals, the Finnish Food Authority must be notified of the food.

The Finnish Food Authority has provided guidance on the notification procedure on its website.

For further information, see section 6.3 of the Food Information Guide for Food Supervisors and Food Operators (in Finnish and Swedish).

Compound ingredients

Compound ingredients are foods used as ingredients that themselves contain more than one ingredient.

As an example of a compound ingredient, the following ingredients are used to produce a strawberry and apple filled bun:

- Wheat flour
- Strawberry and apple filling (sugar, strawberry, apple, water, modified starch, colour E 120)
- Vegetable margarine (partly hydrogenated vegetable fat (turnip rape), rapeseed oil, water, salt, flavouring)
- Sugar
- Egg
- Water
- Yeast
- Salt
- Cardamom

Of these, “strawberry and apple filling” and “vegetable margarine” are compound ingredients, as they contain more than one ingredient.

Indicating compound ingredients

Compound ingredients may be indicated in the list of ingredients of a finished product in one of the following ways:

1. By the name of the compound ingredient

The compound ingredient is listed by its own name in the correct order according to its weight. Immediately after this, its ingredients are indicated in parenthesis or following a semicolon in descending order by weight (*carry-over additives do not need to be indicated).

For example:

Ingredients: **Wheat** flour, strawberry and apple filling (sugar, strawberry, apple, water, modified starch, colour E 120), vegetable margarine (partly hydrogenated vegetable fat (turnip rape), rapeseed oil, water, salt, flavouring), sugar, **egg**, water, yeast, cardamom, salt.

2. As individual ingredients

The individual ingredients in a compound ingredient are indicated in the correct order by their weight (*carry-over additives need not be indicated).

For example:

Ingredients: **Wheat** flour, sugar, water, strawberry, apple, partly hydrogenated vegetable fat (turnip rape), rapeseed oil, **egg**, modified starch, yeast, cardamom, salt, flavouring, colour E 120.

3. In certain cases, by name only

In the following situations, compound ingredients may be indicated in the list of ingredients only by their name without specifying the contained ingredients:

- Compound ingredients that are less than 2% of the finished product and whose composition has been defined by law (such as jam and chocolate)
- Mixtures of spices or herbs that are less than 2% of the finished product

- Compound ingredients are foods referred to in article 19 of the food information regulation whose ingredients do not have to be listed, for example

- butter that contains only milk products, food enzymes and micro-organism cultures
- fermented cheese that contains only milk products, food enzymes or micro-organism cultures and salt.

However, these exceptions do not apply to substances and products that cause allergies and intolerances, which must always be indicated.

*Carry-over additives refer to additives that have ended up in the food as the result of an ingredient, but have no effect in the finished product. These additives are not considered as ingredients of the finished product, and therefore do not have to be indicated in the list of ingredients unless they cause allergies or intolerances. However, carry-over additives must not be confused with additives that come from ingredients and premixtures of additives, which must always be indicated in the list of ingredients. These types of premixtures are commonly used in the food industry.

For further information, see section 6.2.10 of the Food Information Guide for Food Supervisors and Food Operators (in Finnish and Swedish).

Quantities of certain ingredients or ingredient categories

The quantities of food ingredients or ingredient categories must be indicated if their quantities influence the consumers' decisions.

The quantities of ingredients or ingredient categories must be indicated in the following situations:

- The name of the food contains any of its ingredients or ingredient categories. For example:
 - In strawberry yoghurt, the amount of strawberry contained must be indicated.
 - In rye bread, the amount of rye must be indicated.
 - In minced meat produced from different meats, the weight ratio of the meats must be indicated.
- The consumer naturally connects the name of the food with an ingredient or ingredient category. For example:
 - In sausage, the amount of meat must be indicated.
- An ingredient or ingredient category is essential to the food and distinguishes it from other products. For example:
 - In marzipan, the amount of almonds must be indicated.
- The ingredient or ingredient category is emphasised in the product's labelling through words, images or a typeface of a differing size, colour or style. For example:
 - In fruity muesli, the amount of fruit must be indicated.
 - In butter rolls, the amount of butter must be indicated.

How to indicate ingredient quantities

Quantities of ingredients are indicated as a percentage of the total weight of the product. The indication of the quantity must accompany the name of the food or included in the list of ingredients.

Examples on indicating ingredient quantities:

Rainbow trout casserol 400 g
Rainbow trout **20% of weight**

Ingredients: Potato, **rainbow trout, cream**, onion, corn starch, salt, dill, white pepper.

OR

Rainbow trout casserole 400 g

Ingredients: Potato, **rainbow trout (20% of weight), cream**, onion, corn starch, salt, dill, white pepper.

For further information, see section 6.4 of the Food Information Guide for Food Supervisors and Food Operators (in Finnish and Swedish).

You can test your knowledge with the revision exercises found in Section 11 of this guide.

Summary

- ▶ For prepacked foods, list the ingredients by descending order of quantity, from highest to lowest percentage of total weight.
- ▶ Be sure to always include substances that cause allergies or intolerances.
- ▶ If you use food improvement agents, check for possible restrictions on their use and requirements for additional warning labels.
- ▶ If you fortify a food with vitamins or minerals, you must notify the Finnish Food Authority of the food.
- ▶ If you are emphasising a certain ingredient, be sure to indicate its amount in the food.