

Food checklist for the labelling and supply-chain duties that apply today

Mandatory particulars, allergens, nutrition, distance selling, the wine e-label and the EUDR dates - to tick off.

What this checklist covers

Nature of this checklist. These duties apply today under existing law. The EU has excluded this industry from the product passport, so no passport act will follow; we update this list when the underlying law changes.

This checklist is part of our [reference on the digital product passport for food](#), which covers the legal position, the roles, the required data and the official documents for the whole sector; this page narrows it down to the duties you can tick off today.

Food will never have a product passport duty, and it still carries more structured product data than most industries that will. This list sums up what [Regulation \(EU\) No 1169/2011](#) asks of the operator responsible for the food information, what the wine rules of [Regulation \(EU\) 2021/2117](#) allow to move behind a code and what they forbid on the page it leads to, and what the [EUDR](#) will ask of you from the end of 2026. The deadlines follow as a timeline, the official documents are linked under sources, and the whole list is there to download as a PDF below.

The wine section is the only place in EU food law where a QR code may replace printed particulars, and it comes with two prohibitions that decide which provider you can use at all. Read that card even if you do not sell wine.

Which rules reach your product?

Tick what applies. Most food businesses land on the first line alone; wine and the seven raw materials of the EUDR add a second and a third set of duties on top of it.

- ☐ You sell prepacked food to the final consumer or to mass caterers, so the mandatory particulars apply in full.

Art. 9(1)

- ☐ You sell food that is not prepacked, is packed at the consumer's request or is prepacked for direct sale, so only the allergens are mandatory under EU law and the rest is left to national measures.
Art. 44(1)
- ☐ You sell by means of distance communication, so the information has to be there twice, before the purchase and at delivery.
Art. 14(1)
- ☐ You sell wine or another grapevine product, so the ingredient list and the nutrition declaration are compulsory and may partly move behind an electronic means.
Art. 119(1) of Regulation (EU) No 1308/2013
- ☐ You place cattle, cocoa, coffee, oil palm, rubber, soya or wood, or a product made from them, on the Union market, so the EUDR reaches you.
Regulation (EU) 2023/1115, Art. 3 and Annex I

What every prepacked food has to carry

The twelve particulars of Art. 9(1), plus the rules on where they sit and how large they are. This is the part that has been in force since 2014 and that a passport does not replace.

- ☐ The name of the food.
Art. 9(1)(a)
- ☐ The list of ingredients.
Art. 9(1)(b)
- ☐ Any ingredient or processing aid listed in or derived from Annex II that causes allergies or intolerances and is still present in the finished product, even in an altered form.
Art. 9(1)(c)
- ☐ The quantity of certain ingredients or categories of ingredients.
Art. 9(1)(d)
- ☐ The net quantity of the food.
Art. 9(1)(e)
- ☐ The date of minimum durability or the use-by date.
Art. 9(1)(f)
- ☐ Any special storage conditions or conditions of use.
Art. 9(1)(g)
- ☐ The name or business name and address of the food business operator responsible for the food information.
Art. 9(1)(h)
- ☐ The country of origin or place of provenance where its absence might mislead, and for the meat of the CN codes of Annex XI.
Art. 9(1)(i), Art. 26(2)

- ☐ Instructions for use where it would be difficult to use the food appropriately without them.
Art. 9(1)(j)
- ☐ The actual alcoholic strength by volume for beverages above 1,2 per cent by volume.
Art. 9(1)(k)
- ☐ A nutrition declaration.
Art. 9(1)(l)
- ☐ All of it in words and numbers, directly on the package or on a label attached to it.
Art. 9(2), Art. 12(2)
- ☐ In characters whose x-height is at least 1,2 millimetres, or at least 0,9 millimetres where the largest surface of the packaging is smaller than 80 square centimetres.
Art. 13(2) and (3), Annex IV
- ☐ The name of the food, the net quantity and the alcoholic strength in the same field of vision.
Art. 13(5)
- ☐ Where you name an origin for the food and the primary ingredient comes from somewhere else, the origin of that primary ingredient, or a statement that it differs.
Art. 26(3)

Allergens

Fourteen categories, and the one particular that no data-carrier discussion has ever been allowed to touch. Where a recipe changes, this is the field that decides whether a print run has to be pulled.

- ☐ Indicate them in the list of ingredients with a clear reference to the name of the substance or product as it stands in Annex II.
Art. 21(1)(a)
- ☐ Emphasise that name through a typeset that clearly distinguishes it from the rest of the list, for example by font, style or background colour.
Art. 21(1)(b)
- ☐ Where there is no list of ingredients at all, use the word contains followed by the name as listed in Annex II.
Art. 21(1)
- ☐ Cover all fourteen categories of Annex II, from cereals containing gluten through nuts, celery, mustard, sesame, sulphites and lupin to molluscs, with the exemptions the annex spells out per entry.
Annex II
- ☐ For food that is not prepacked, treat the allergens as the one particular EU law makes mandatory regardless of what your Member State requires on top.
Art. 44(1)(a)

The nutrition declaration

Six nutrients and an energy value, in fixed units and a fixed order. It is the closest thing food law has to a structured dataset, and it is recalculated every time a recipe moves.

- ☐ Declare the energy value and the amounts of fat, saturates, carbohydrate, sugars, protein and salt.
Art. 30(1)
- ☐ Supplement voluntarily, if you wish, with mono-unsaturates, polyunsaturates, polyols, starch, fibre or the vitamins and minerals of Annex XIII Part A present in significant amounts.
Art. 30(2)
- ☐ Express the values in the measurement units of Annex XV.
Art. 32(1)
- ☐ Express them per 100 grams or per 100 millilitres, whatever else you add per portion.
Art. 32(2)
- ☐ Put them in the same field of vision, presented together in a clear format and, where appropriate, in the order of Annex XV.
Art. 34(1)
- ☐ Use a tabular format with the numbers aligned where space permits, and a linear format only where it does not.
Art. 34(2)

Distance selling

Selling online means giving the information twice, and the only particular you may hold back before the purchase is the date. Everything else has to be readable before someone pays.

- ☐ Make every mandatory particular except the date of minimum durability or use-by date available before the purchase is concluded.
Art. 14(1)(a)
- ☐ Put it on the material supporting the distance selling, or provide it through other appropriate means clearly identified by you, without charging the consumer any supplementary cost for it.
Art. 14(1)(a)
- ☐ Make all mandatory particulars, the date included, available at the moment of delivery.
Art. 14(1)(b)
- ☐ Note the exception - the pre-purchase rule does not apply to food sold from automatic vending machines or automated commercial premises.
Art. 14(3)

Wine and the electronic label

This is the one place where EU food law lets a QR code carry compulsory particulars. It also fixes what the page behind the code may not do, and those two prohibitions are a procurement criterion, not a design preference.

- ☐ Carry a nutrition declaration on the wine.

Art. 119(1)(h) of Regulation (EU) No 1308/2013

- ☐ Carry a list of ingredients.

Art. 119(1)(i)

- ☐ Carry a date of minimum durability where the product has been de-alcoholised and has an actual alcoholic strength below 10 per cent by volume.

Art. 119(1)(j)

- ☐ Keep the energy value on the package or an attached label, where it may be limited to that value and expressed with the symbol E, and give the full nutrition declaration by electronic means identified on the pack.

Art. 119(4)

- ☐ Display that electronic nutrition declaration with no other information intended for sales or marketing purposes, and collect or track no user data.

Art. 119(4)

- ☐ Give the list of ingredients by electronic means under the same two conditions, no tracking and no sales or marketing content.

Art. 119(5)(a) and (b)

- ☐ Keep the allergens directly on the package or an attached label, as the word contains followed by the name of the substance as listed in Annex II to Regulation (EU) No 1169/2011.

Art. 119(5)(c)

- ☐ Label the code with a proper term or the heading required by Art. 18(1) of Regulation (EU) No 1169/2011, because a generic symbol such as an i does not satisfy the provision.

Commission Notice C/2023/1190, Q38

- ☐ Take the reader immediately and directly to the compulsory information, with no form, no query, no consent step and no intermediate site in the way.

Commission Notice C/2023/1190, Q35

- ☐ Do not serve the compulsory information from your own website, which typically carries commercial content and normally tracks its users.

Commission Notice C/2023/1190, Q30

- ☐ Keep selling wine produced and labelled before 8 December 2023 until stocks are exhausted, without relabelling it.

Regulation (EU) 2021/2117, Art. 5(8)

Deforestation-free supply chains

From 30 December 2026 the origin of seven raw materials stops being a country and becomes a coordinate. The coordinates sit several steps upstream, which is why this card is the one with the longest lead time on the whole page.

- ☐ Check whether your product contains or was made using cattle, cocoa, coffee, oil palm, rubber, soya or wood.
Regulation (EU) 2023/1115, Annex I
- ☐ Place nothing on the market that is not deforestation-free, produced in accordance with the relevant legislation of the country of production, and covered by a due diligence statement or a simplified declaration.
Art. 3
- ☐ Exercise the due diligence before you place the product on the market or export it, not afterwards.
Art. 4(1)
- ☐ Make the due diligence statement available to the competent authorities through the information system before placing or exporting, and take responsibility for compliance by doing so.
Art. 4(2) and (3)
- ☐ Keep a record of the statements for five years from the date of submission.
Art. 4(3)
- ☐ Collect and keep for five years the description and quantity, the country of production, the businesses you bought from and supplied to, and adequately conclusive and verifiable information that the product is deforestation-free and legally produced.
Art. 9(1)(a) to (h)
- ☐ Collect the geolocation of every plot of land where the commodity was produced, with the date or time range of production; for cattle the geolocation refers to all establishments where the animals were kept.
Art. 9(1)(d)
- ☐ Give those coordinates as latitude and longitude with at least six decimal digits, and as polygons for plots above four hectares for every commodity other than cattle.
Art. 2, point (28)
- ☐ Carry out the risk assessment and place nothing on the market unless it reveals no or only a negligible risk of non-compliance.
Art. 10(1)
- ☐ Document the risk assessment, review it at least annually and make it available to the competent authorities on request.
Art. 10(4)
- ☐ Adopt risk mitigation procedures and measures wherever the risk is more than negligible, from requesting further documents to independent surveys or audits.
Art. 11(1)

- ☐ If you are a micro or small primary operator, submit the one-time simplified declaration instead and keep the declaration identifier you are assigned.

Art. 4a, inserted by Regulation (EU) 2025/2650

Deadlines

The dates that matter for a food business. The first three have passed and are enforced today; the EUDR dates are the ones still ahead, and they were replaced wholesale in December 2025.

13 DECEMBER 2014

● The food information rules apply

Regulation (EU) No 1169/2011 applies. The mandatory particulars of Art. 9(1), the allergens emphasised in the ingredient list under Art. 21(1), the country of origin where its absence would mislead under Art. 26(2)(a) and, in distance selling, the same information before the purchase is concluded under Art. 14(1)(a).

13 DECEMBER 2016

● The nutrition declaration becomes mandatory

Energy value and the amounts of fat, saturates, carbohydrate, sugars, protein and salt become compulsory for most prepacked food (Art. 30(1)). From this point a food label carries a small structured dataset rather than prose, which is why the figures belong in a maintained system.

8 DECEMBER 2023

● The wine e-label applies

The ingredient list and the nutrition declaration become compulsory for wine, and both may be given by electronic means (Art. 119(1), (4) and (5) of Regulation (EU) No 1308/2013, inserted by Regulation (EU) 2021/2117). Wine produced and labelled before this date may be sold until stocks are exhausted.

19 DECEMBER 2025

● The EUDR is simplified and moved again

Regulation (EU) 2025/2650 replaces Art. 38 of Regulation (EU) 2023/1115 in its entirety, introduces the one-time simplified declaration for micro or small primary operators (Art. 4a) and adds the downstream operator as a category. Read the dates from the replacing article, never from the original text.

30 DECEMBER 2026

The EUDR applies to operators and traders

Cattle, cocoa, coffee, oil palm, rubber, soya and wood may only be placed on the market deforestation-free, produced in accordance with the law of the country of production, and covered by a due diligence statement or a simplified declaration (Art. 3, Art. 4). This is the general date for everyone the regulation reaches.

30 JUNE 2027

Six more months for the smallest operators

Operators who are natural persons or micro or small undertakings and were established as such by 31 December 2024 get the same duties six months later (Art. 38(3)). The relief does not cover products already covered by the Annex to Regulation (EU) No 995/2010, and a micro enterprise founded in 2025 does not get it at all.

FIVE YEARS PER SHIPMENT

The supply-chain record keeps running

The due diligence statements are kept for five years from the date they were submitted (Art. 4(3)), and the information and evidence behind them for five years from the placing on the market or the export (Art. 9(1)). Every consignment starts its own clock.

NO ACT PLANNED

Food stays outside the product passport

Art. 1(2)(a) and (b) of Regulation (EU) 2024/1781 exclude food and feed within the meaning of Regulation (EC) No 178/2002 from the Ecodesign for Sustainable Products Regulation. There will be no delegated act and no mandatory passport for food. Everything above comes from food law and supply-chain law instead.

Sources

The documents this checklist is drawn from, and what each one is good for. The EUDR has been amended, so read the consolidated text rather than the version as adopted.

Document	What for
Regulation (EU) No 1169/2011	The core of food labelling. Art. 9 the mandatory particulars, Art. 13 the legibility rules, Art. 14 distance selling, Art. 21 and Annex II the allergens, Art. 26 origin, Art. 30 to 34 the nutrition declaration, Art. 44 non-prepacked food.

Document	What for
Regulation (EU) 2021/2117	The amendment that inserted the wine rules into Art. 119 of Regulation (EU) No 1308/2013, including the electronic means and the two prohibitions. Art. 5(8) carries the transitional rule for stock produced before 8 December 2023.
Commission Notice C/2023/1190	The Commission's questions and answers of 24 November 2023 on the wine rules. It answers what the code may lead to, why a producer website does not qualify and why there is no consent workaround for the tracking ban.
Regulation (EU) 2023/1115	The deforestation regulation. Art. 2 point 28 the geolocation definition, Art. 3 the prohibition, Art. 4 the statement, Art. 9 the information requirements, Art. 10 and 11 risk assessment and mitigation, Annex I the seven commodities.
Regulation (EU) 2025/2650	The amendment of 19 December 2025. It replaces Art. 38 with the current dates, adds the simplified declaration of Art. 4a and introduces the downstream operator.

How to prepare

Six steps in the order they pay off, from the label you already print to the plot coordinates you do not have yet.

1. **Audit one label against Art. 9(1):** take your busiest product and walk points (a) to (l). Where a particular exists only inside an artwork file, note the system it should live in instead.
2. **Make nutrition and allergens data, not text:** the energy value with its six nutrients and the fourteen categories belong in fields, so a recipe change shows you which products and which print runs are affected on the same afternoon.
3. **Decide the batch question early:** nutritional values shift with the harvest and origin shifts with the supplier, so decide per product line whether the passport sits at model or at batch level before you import anything.
4. **For wine, settle the two prohibitions first:** no marketing content and no tracking on the page behind the code. Ask any provider to state both in writing, because the Commission Notice leaves no consent workaround.
5. **Start the EUDR conversation with the traders, not the software:** plot coordinates sit at the farm and travel through people with no reason to pass them on unless a contract says so. That negotiation is longer than any implementation.

6. **Pilot with a handful of products:** [Register for free](#), set up the fields of this checklist once and publish a few real products. Ingredients, allergens and nutrition become fields, origin can go down to the plot, and nothing tracks the person who scans.

As of 9 September 2026. The current version of this checklist:

<https://transpareo.com/en/industries/food/checklist-food>