



## Guideline for the interpretation of the Regulation of Food Information to Consumers\* regarding vegetable oils and fats

This is an English courtesy translation of the original guideline  
prepared in German language.

\* Regulation EU (No) 1169/2011 dated 25 October 2011

## Foreword

On 13 December 2014, the Regulation of Food Information to Consumers (EU) No 1169/2011 came into effect throughout Europe. After a multitude of changes, the EU Parliament voted with a majority on 06.07.2011 on the negotiated compromise in its second reading.

A general guideline with the title "Questions and Answer on the application of the Regulation (EU) No 1169/2011 on the provision of food information to consumers", which does not deal with all the specific questions, is already available to aid understanding and correct application of this comprehensive regulation.

With regard to the labelling of vegetable oils and fats, in recent months the manufacturers, providers and users of these vegetable oils and fats have developed practical approaches, and have compiled these in the form of this interpretation guideline. The work is aimed at achieving nationwide standard implementation of the Regulation with regard to vegetable oils.

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## Hydrogenation labelling

The expression of the refinement ("fully hydrogenated" or "partly hydrogenated") should be indicated in direct combination with details of the type of vegetable oil or fat, so that it is clear as to which ingredient has been refined. This can be either before or after the designation.

As refinement labelling is mandatory, all the remaining oils and fats are therefore, unrefined. **A declaration in the list of ingredients, which states that no refinement has taken place, could be considered a self-evident statement, and therefore, should not be used.** The expression of refinement in the list of ingredients should only take place if all the oils and fats in this category were handled in the same way.

The expression of the partly of fully hydrogenated product should be related to the initial material.

### Examples of refinement labelling

The product contains: Fully hydrogenated rapeseed oil, partly hydrogenated palm fat, fully hydrogenated palm fat, coconut fat

Declaration option 1:

Rapeseed oil, fully hydrogenated, palm fat, partly hydrogenated, palm fat, fully hydrogenated, coconut fat

Declaration option 2:

Fully hydrogenated rapeseed oil, partly hydrogenated palm fat, fully hydrogenated palm fat, coconut fat

Declaration option 3:

Fully hydrogenated rapeseed oil, partly and fully hydrogenated palm fat, coconut fat

## Classification into the category oil or fat

In Germany, **vegetable oils** are typically understood to be oils that are **liquid at 20 °C**. In Germany, **vegetable fats** are typically understood to be fats that are **semi-solid or solid at 20 °C**.

Different perceptions exist throughout the different European countries regarding the distinguishing between oils and fats - including different temperatures for the differentiation of oils from fats, or even the exception of individual products from this distinction.

In general terms, alternative expressions for the individual products - irrespective of their consistency - have been established; examples are: cocoa butter, shea butter, palm oil, palm kernel oil, coconut oil.

## Information about the vegetable origin

sufficient for

- a) Palm & palm kernel fat,
- b) Fractions and
- c) Highly oleic acid-rich varieties

A distinction between palm fat and palm kernel fat is only found in expert circles and is unusual at the consumer level. The aim of the Regulation (EU) No 1169/2011 is to provide information about the vegetable origin (compare Regulation (EU) No 1169/2011 Annex VII Part A No. 8 and 9). Like palm fat, palm kernel fat originates from the same plant, the oil palm. The vegetable origin is therefore, already covered by the term palm, palm oil or palm fat. A separate designation of palm fat and palm kernel fat is still, however, possible.

Information about the vegetable origin is also sufficient for fractions of vegetable oils and fats.

Information about the vegetable origin is also sufficient for special cultures such as highly oleic-rich varieties (high oleic varieties or HO-varieties).

### Example information about the vegetable origin:

The product contains: Palm fat, rapeseed oil, palm kernel fat, HO-sunflower oil, HO-rapeseed oil

Declaration option 1:

Palm fat, rapeseed oil,  
sunflower oil

Declaration option 2:

Palm fat, rapeseed oil, palm  
kernel fat, high oleic sunflower  
oil, high oleic rapeseed oil

Declaration option 3:

Palm oil, rapeseed oil, palm  
kernel fat, high oleic sunflower  
oil, high oleic rapeseed oil

## Grouping into ingredient classes

Where at least two vegetable oils or vegetable fats are present, the following summaries are possible:

- As long as vegetable oils are included, these can be grouped together in the ingredient class "vegetable oils" with subsequent information about their vegetable origin.
- As long as vegetable fats are included, these can be grouped together in the ingredient class "vegetable fats" with subsequent information about their vegetable origin.

In practice, a mixture of vegetable oils and fats is often used. The organisations recommend grouping these together in the ingredient class "vegetable oils and fats" with subsequent information about their vegetable origin.

There are several reasons for this:

- **convenience for consumers** – as the grouping together in the ingredient classes "vegetable oils and fats" in combination with information about the vegetable origin and the future mandatory nutritional information will be suited to the information requirements of the consumer; recognition of the nutritional physiological weighting by the consumer is also possible through the information about the nutritional value.
- **sensible** – as oils and fats belong to the same chemical family of triglycerides;
- **practical** – as for example for reasons of "variable proportions", alternatively the position of the entry in the ingredients class "vegetable oils" and "vegetable fats" in the list of ingredients must often be changed, and a change in the product packaging is only realistic with the appropriate advance notice (see the Section Recipe changes or change of the raw materials).

If oils and fats are grouped together in one ingredient class, the total weight of the individual oils and fats is relevant to the position of this ingredients class in the list of ingredients.

In the case of a grouping together of oils and fats in an ingredient class, then "there is no special order given for the list of vegetable origins" [[Hagemeyer: LMIV Kommentar, Behrs Verlag 2012](#)]. For reasons of clarity, however, the adherence to a decreasing series is recommended by the associations if the indication of "variable proportions" is omitted (see next section).

A special note about individual oils and fats beyond the grouping together is possible.

Grouping into ingredient classes is not compulsory. It can also be left out.

**Example 1: Grouping into ingredient classes**

The product contains: Rapeseed oil, ...\*, palm fat, sunflower oil, (\*...: other ingredients)

Declaration option 1:

Vegetable oils and fats (rapeseed, palm, sunflower), ..

Declaration option 2:

Vegetable oils (rapeseed, sunflower), ..., palm fat

Declaration option 3:

Rapeseed oil, ..., palm fat, sunflower oil

**Example 2: Grouping into ingredient classes**

The product contains: Rapeseed oil, coconut fat, sunflower oil, palm fat

Declaration option 1:

Vegetable oils and fats (rapeseed, coconut, sunflower, palm)

Declaration option 2:

Vegetable oils (rapeseed, sunflower), vegetable fats (coconut, palm)

Declaration option 3:

Vegetable oils (rapeseed, sunflower, coconut, palm)

Declaration option 4:

Rapeseed oil, sunflower oil, vegetable fats (coconut, palm)

Declaration option 5:

Vegetable oils (rapeseed, sunflower), coconut fat, palm fat

Declaration option 6:

Rapeseed oil, coconut fat, sunflower oil, palm fat

The use of brackets represents only one possibility of indicating the vegetable origin of the individual oils and fats of an ingredient class; other options are also possible. Here, the affiliation of the components to the ingredients class must be recognisable.

## Variable proportions

If the mixture ratio of the used oils and fats varies, they can be grouped together in ingredients classes. In this case, the note "in variable proportions" is possible after the information about the vegetable origin.

The note "in variable proportions" is only allowed in combination with the grouping in ingredient classes.

### Example of variable proportions:

The product contains: 40 – 90 % coconut fat, 10 – 60 % rapeseed oil

Declaration:

Vegetable oils and fats (coconut, rapeseed, in variable proportions)

### Recipe changes or change of the raw materials

The information about the ingredients used must correspond to the actual oils and fats included in the product.

If you would like to keep the declaration unchanged although mixture variations are necessary due to seasonal raw ingredient fluctuations or as a result of market forces, then it must be ensured that a certain proportion of the relevant raw material remains included in the mixture. Here, the declaration of the ingredient "in variable proportions" must be included. **In the case of the proportion being 0 %, the "in variable proportions" cannot be used.**

For cases where at least one of a maximum of two similar or interchangeable ingredients is present at below 2 % in the end product, the formulation "Contains ... and/or ..." (in accordance with Regulation (EU) No 1169/2011 Annex VII Part A No. 7) can be used. In this case, the note "in variable proportions" should not be included.

### Example 1: Change of the raw materials

The product contains: 80 % rapeseed oil, 20 % palm stearin, 0 % shea butter

Declaration option 1:

Vegetable oils and fats  
(rapeseed, palm)

Declaration option 2:

Rapeseed oil, palm fat

### Example 2: Seasonal differences in the use of raw material

The product contains: 78 % rapeseed oil, 2–20 % coconut fat, 2–20 % shea butter

Declaration:

Vegetable oils and fats (rapeseed,  
coconut, shea, in variable  
proportions)

## Grouped together examples

The product contains: 20 % HO-rapeseed oil, 20 % palm olein, 20 % partly hydrogenated palm fat, 20 % fully hardened rapeseed oil, 10 % shea butter, 10 % fully hardened palm kernel fat, 0 % sunflower oil

Declaration option 1:

Vegetable oils and fats (rapeseed; palm; palm, partly hydrogenated; rapeseed, fully hydrogenated; shea butter; palm, fully hydrogenated)

Declaration option 2:

Vegetable fats (palm; palm, partly hydrogenated; shea; palm, fully hydrogenated) vegetable oils (rapeseed oil, rapeseed, fully hydrogenated)

Declaration option 3:

Rapeseed oil, palm fat, partly hydrogenated palm fat, fully hydrogenated rapeseed oil, shea butter, fully hydrogenated palm fat

Declaration option 4:

High oleic rapeseed oil, palm fat, partly hydrogenated palm fat, fully hydrogenated rapeseed oil, shea butter, fully hydrogenated palm kernel fat

HO-rapeseed oil, palm fat, HO-sunflower oil, rapeseed oil, coconut oil, fully hardened palm fat

Declaration option 1:

Vegetable oils and fats (rapeseed; palm; sunflower; coconut; palm, fully hydrogenated)

Declaration option 2:

Vegetable oils and fats (rapeseed, palm, sunflower, coconut), ..., fully hydrogenated palm fat

Declaration option 3:

Vegetable oils (rapeseed, sunflower), vegetable fats (palm; coconut; palm, fully hydrogenated)

Declaration option 4:

High oleic rapeseed oil, high oleic sunflower oil, rapeseed oil, vegetable fats (palm; coconut; palm, fully hydrogenated)

Declaration option 5:

Rapeseed oil, sunflower oil, vegetable fats (palm; coconut; palm, fully hydrogenated)

Declaration option 6:

Rapeseed oil, palm fat, sunflower oil, coconut fat, fully hydrogenated palm fat

Declaration option 7:

Rapeseed oil, palm fat, sunflower oil, coconut fat, fully hydrogenated palm fat

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