foodcortex

COMPLIANCE BRIEF

Mandatory Labelling Requirements for Food Supplements

Practical regulatory guidance for Great Britain,
with Northern Ireland, Ireland and European Union considerations.

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At a glance

Food supplements are subject to specific labelling requirements in addition to the general food information rules that apply to prepacked foods.

For businesses preparing food supplement labels for Great Britain, the key requirements include:

- The prescribed designation **"food supplement"**.
- An indication of the vitamins, minerals or other substances characterising the product.
- The portion of the product recommended for daily consumption.
- Three mandatory statements relating to the prevention of exceeding the recommended daily dose, the importance of a varied diet, and storage out of the reach of young children.
- Quantitative declarations of vitamins, minerals and other substances with a nutritional or physiological effect.
- General mandatory food information, including ingredients, relevant allergens, date marking and food business operator details.
- Additional information where particular ingredients or nutrition and health claims trigger further requirements.

This brief explains these obligations and demonstrates how they can be incorporated into a practical food supplement label.

How to use this brief

The guidance is structured around the mandatory particulars required for food supplements, followed by a worked label example and a pre-publication checklist.

The principal focus is Great Britain (England, Scotland and Wales). Businesses placing products on the market in Northern Ireland, Ireland or other EU Member States should also assess their labels against specific market requirements and general food information legislation.

1. Regulatory framework

1.1 Food supplement legislation in Great Britain

Food supplements are regulated in Great Britain through legislation applying separately in England, Scotland and Wales.

The principal instruments are:

- The Food Supplements (England) Regulations 2003, as amended.
- The Food Supplements (Scotland) Regulations 2003, as amended.
- The Food Supplements (Wales) Regulations 2003, as amended.

These regulations establish requirements relating to the composition, presentation and labelling of food supplements.

They operate alongside wider food law, including:

- Regulation (EU) No 1169/2011 on the provision of food information to consumers, as it applies in Great Britain.
- Regulation (EC) No 1924/2006 on nutrition and health claims made on foods, as it applies in Great Britain.
- Relevant legislation governing food additives, novel foods and other ingredients.

Food supplement labels must therefore be assessed against both supplement-specific requirements and general food information legislation.

1.2 Great Britain and Northern Ireland

Great Britain and Northern Ireland do not operate under an entirely identical food regulatory framework.

Northern Ireland continues to apply relevant EU food law under the Windsor Framework arrangements, subject to applicable provisions and any specific UK arrangements.

Businesses supplying both Great Britain and Northern Ireland should not assume that a label assessed for Great Britain will automatically satisfy every Northern Ireland requirement.

The UK Internal Market Act 2020 and relevant market-access arrangements may also affect how goods lawfully marketed in one part of the United Kingdom can be supplied elsewhere. These provisions require consideration in the context of the particular product and route to market; they do not remove the need to identify applicable food safety and labelling obligations.

1.3 Ireland and other EU Member States

EU Directive 2002/46/EC establishes the food supplement framework within the European Union.

General food information requirements are principally governed by Regulation (EU) No 1169/2011.

Although many underlying requirements are aligned, individual Member States may impose additional national provisions, particularly concerning notification, certain ingredients and language requirements.

A single multilingual label may be possible for several markets, but compliance must be assessed for each intended destination.

2. Product designation

Food supplements must be marketed under the designation **“food supplement”**.

This is a prescribed designation under food supplement legislation.

The designation can appear alongside a descriptive product name identifying the nutrients or other substances characterising the supplement.

Example:

Vitamin C & Zinc
Food Supplement

Or

Food Supplement with Vitamin C and Zinc

The descriptive wording communicates the nature of the product, while “Food Supplement” fulfils the prescribed designation requirement.

3. General mandatory food information

Food supplements are prepacked foods and are subject to the relevant requirements of Regulation (EU) No 1169/2011, as applicable in Great Britain.

3.1 Core particulars

Particular	Application to food supplements
Name of the food	Must include the prescribed designation “food supplement”.
List of ingredients	Required, subject to applicable rules and exemptions.
Allergens	Relevant substances or products causing allergies or intolerances must be declared and emphasised as required.
Quantity of certain ingredients or categories of ingredients	Required where the conditions for quantitative ingredient declaration (QUID) apply, subject to relevant exemptions.
Net quantity	Requirements and exemptions depend on how the product is presented and sold.
Date of minimum durability	Normally expressed using an appropriate “best before” or “best before end” declaration.
Special storage conditions or conditions of use	Required where applicable.
Food business operator details	Name or business name and address of the responsible food business operator.
Country of origin or place of provenance	Required in circumstances specified by legislation, including where omission would mislead consumers.
Instructions for use	Required where it would be difficult to make appropriate use of the food without them.
Nutrition declaration	Food supplements are exempt from the conventional mandatory nutrition declaration, but are subject to separate quantitative declaration requirements.

3.2 Ingredient declaration

Ingredients must be declared in accordance with the applicable food information rules, generally in descending order of weight as recorded at the time of their use in the manufacture of the food.

This means that the ingredient order is established at the point of formulation or manufacture, sometimes referred to in practice as the **mixing bowl stage**, rather than by attempting to determine the relative weights of ingredients in the finished product.

Ingredient declarations must also follow the applicable rules for:

- Appropriate ingredient names.
- Compound ingredients.
- Food additives and their functional classes.
- Relevant allergen declarations.
- Ingredients requiring additional particulars under specific legislation.

Food additives are generally declared using the appropriate functional class followed by their specific name or E-number, where required.

Example:

Ingredients: Bulking Agent (Microcrystalline Cellulose), Anti-caking Agent (Silicon Dioxide).

Where an ingredient contains an allergen listed in Annex II to Regulation (EU) No 1169/2011, the relevant allergen must be emphasised in the ingredients list, subject to applicable exemptions.

Illustrative example:

Ingredients: **Fish** oil, softgel capsule (bovine gelatine, humectant (glycerol), water).

This example illustrates allergen emphasis only and is not intended to represent a complete formulation.

3.3 Quantitative ingredient declaration (QUID)

The general food information rules require a quantitative indication of certain ingredients or categories of ingredients in specified circumstances.

However, QUID is not typically mandatory for the vitamins, minerals and other substances characterising a food supplement where the relevant exemption applies and their quantities are declared under the supplement-specific requirements.

The applicability of QUID should nevertheless be considered where other ingredients are emphasised in the product name, labelling or presentation.

3.4 Net quantity and products sold by number

The general rules on net quantity contain exemptions relevant to products customarily sold by number.

Where the conditions in Annex IX to Regulation (EU) No 1169/2011 are satisfied, products such as tablets and capsules may be declared by number without a separate weight or volume declaration.

Example:

120 tablets

This should not be treated as an automatic exemption for every food supplement format. Liquids, powders and other presentations require assessment against the applicable rules.

3.5 Date marking

Food supplements normally require a date of minimum durability.

For products with an appropriate shelf life, the declaration may use:

Best before end: MM/YYYY

Where the date is provided elsewhere on the packaging, a reference such as “Best before end: See base of container” may be used where the applicable requirements are satisfied.

A batch or lot identification may also be required under separate legislation.

3.6 Food business operator details

The label must identify the responsible food business operator by name or business name and address, in accordance with the applicable requirements.

The address must be sufficient to identify and contact the responsible operator through a postal address.

The responsible operator and appropriate address must be determined for the relevant market.

4. Mandatory food supplement particulars

Food supplement legislation establishes additional labelling requirements beyond the general rules for prepacked foods.

4.1 Characterising nutrients and substances

The label must include:

"the name of the category of any vitamin or mineral or other substance with a nutritional or physiological effect which characterises the product or an indication of the nature of that vitamin or mineral or other substance"

This may be communicated through a descriptive product name or other appropriate wording.

Examples:

- Vitamin C & Zinc
- Multivitamin & Mineral
- Magnesium
- Fish Oil

The wording must accurately reflect the product's composition.

4.2 Recommended daily consumption

The label must indicate the **portion of the product recommended for daily consumption**.

For example:

Recommended daily intake: Take one tablet daily.

The instruction should be clear, appropriate to the product and consistent with the quantitative declarations.

4.3 Three mandatory statements

Food supplement legislation requires the following statements or warnings to be communicated:

1. Do not exceed the stated recommended daily dose.

2. Food supplements should not be used as a substitute for a varied diet.

3. Store out of the reach of young children.

The wording may be incorporated into a label's directions and warnings section, provided the required information is communicated clearly.

These requirements apply independently of additional warnings that may arise from particular ingredients or authorised health claims.

4.4 Quantitative declarations

The label must declare the amounts of vitamins, minerals and other substances with a nutritional or physiological effect present in the product, as required by food supplement legislation.

The declared amounts must be expressed per portion of the product recommended for daily consumption.

For vitamins and minerals, the declared amounts must also be expressed as percentages of the applicable Nutrient Reference Values (NRVs).

The declared amounts are those of the **vitamin or mineral nutrient**, rather than the total weight of the chemical substance used as its source.

For example, the declaration of zinc refers to the quantity of elemental zinc supplied, not the weight of zinc oxide included in the formulation.

5. Presenting nutrient quantities

5.1 Recommended declaration format

A clear format for tablet and capsule supplements is:

Each tablet provides:

Nutrient	Amount	% NRV
Vitamin C	100 mg	125%
Zinc	15 mg	150%

NRV = Nutrient Reference Value.

For a product with a recommended daily intake of one tablet, the amounts per tablet correspond to the amounts per recommended daily portion.

Where the recommended daily intake is more than one tablet or capsule, the quantitative declaration must reflect the recommended daily portion.

5.2 Nutrient source versus nutrient quantity

It is important to distinguish between the ingredient used in manufacture and the nutrient supplied.

For example:

Ingredients: Vitamin C (L-ascorbic Acid), Zinc (Zinc Oxide).

Quantitative declaration:

Vitamin C — 100 mg
Zinc — 15 mg

The ingredients list identifies the substances used in manufacture, while the quantitative declaration indicates the amounts of the relevant nutrients.

Food Cortex's illustrative labels adopt the practical convention of identifying the nutrient first, followed by its source in brackets, where appropriate and supported by the formulation.

5.3 Conventional nutrition declaration

Food supplements are exempt from the conventional mandatory nutrition declaration required for many other prepacked foods.

This does not remove the requirement to provide the supplement-specific quantitative declarations described above.

The two requirements should not be confused.

6. Legibility and presentation

Mandatory food information must be presented in accordance with the applicable legibility requirements.

Under Regulation (EU) No 1169/2011, mandatory particulars must generally be printed using a font size with an x-height of at least **1.2 mm**.

Where the largest surface of the packaging or container has an area of less than 80 cm², the minimum x-height is **0.9 mm**.

Other applicable requirements concerning visibility, clarity, indelibility and the presentation of mandatory particulars must also be considered.

The name of the food and net quantity must appear in the same field of vision.

For products marketed in Great Britain, mandatory information must be provided in English.

Products marketed elsewhere may require additional languages or market-specific presentation.

7. Additional ingredient and claims requirements

7.1 Ingredient-specific information

Some food supplement ingredients are subject to additional labelling conditions.

Examples may include:

- Warnings or statements required for particular authorised novel foods.
- Conditions associated with certain additives or ingredients.
- Relevant allergen information.
- Restrictions or mandatory particulars arising from applicable national legislation.

These obligations must be assessed against the actual ingredients, specifications and intended markets.

An ingredient's permitted use in a food supplement does not necessarily mean that it can be used without additional conditions or labelling requirements.

7.2 Nutrition and health claims

Nutrition and health claims must comply with Regulation (EC) No 1924/2006, as applicable to the relevant market.

A health claim may only be used where it is authorised and the applicable conditions of use are met.

For example, the authorised claim:

"Vitamin C contributes to the normal function of the immune system."

may be used where the applicable conditions are satisfied.

In addition to the claim-specific conditions, Article 10(2) establishes accompanying information requirements for health claims.

The label, or presentation and advertising where there is no labelling, must include:

1. A statement indicating the importance of a varied and balanced diet and a healthy lifestyle.
2. The quantity of the food and pattern of consumption required to obtain the claimed beneficial effect.
3. Where appropriate, a statement addressed to persons who should avoid using the food.
4. An appropriate warning for products likely to present a risk to health if consumed to excess.

These requirements are separate from the mandatory food supplement statements.

However, where the obligations overlap, appropriate wording may communicate the relevant information together.

For example:

A varied, balanced diet and healthy lifestyle are important. Food supplements should not be used as a substitute for a varied diet.

This combines the food supplement varied-diet statement with the health-claim requirement concerning a varied and balanced diet and healthy lifestyle.

7.3 Recycling and environmental information

Packaging and environmental obligations may arise under separate legislation, including extended producer responsibility arrangements.

However, Great Britain does not currently impose a universal requirement for every food supplement to display a particular consumer-facing recycling symbol.

Environmental labelling obligations can differ across European markets and should be assessed separately where relevant.

8. Worked example: Cortex Nutrition Vitamin C & Zinc

The following example demonstrates how the mandatory information can be presented on a conventional tablet food supplement intended for Great Britain.

The formulation and nutrient quantities are based on a conventional commercially marketed supplement, but the example uses original branding and illustrative operator details.

8.1 Front-of-pack example



Illustrative Cortex Nutrition bottle artwork

CORTEX NUTRITION

Vitamin C & Zinc

Food Supplement

Vitamin C contributes to the normal function of the immune system.

120 tablets

8.2 Back-of-pack example

Food Supplement with Vitamin C and Zinc

Ingredients: Vitamin C (L-ascorbic Acid), Bulking Agents (Dicalcium Phosphate, Microcrystalline Cellulose, Cross-linked Sodium Carboxymethylcellulose), Zinc (Zinc Oxide), Anti-caking Agents (Magnesium Salts of Fatty Acids, Fatty Acids, Silicon Dioxide).

Recommended daily intake: Take one tablet daily.

Each tablet provides:

Nutrient	Amount	% NRV
Vitamin C	100 mg	125%
Zinc	15 mg	150%

NRV = Nutrient Reference Value.

Do not exceed the stated recommended daily dose.

A varied, balanced diet and healthy lifestyle are important. **Food supplements should not be used as a substitute for a varied diet.**

Store out of the reach of young children.

Storage: Store in a cool, dry place.

Best before end: See base of container.

Batch: See base of container.

Food Cortex Limited
12 Orchard Business Park
Sampleton
ZZ1 1ZZ
United Kingdom

Fictional business name and address used for illustration.

8.3 Understanding the example

FRONT LABEL

FRONT-OF-PACK LABEL • FLAT ARTWORK

CORTEX
NUTRITION

Vitamin C & Zinc

Food Supplement

Vitamin C contributes to the normal function of the immune system.

120 tablets

BACK LABEL

BACK-OF-PACK LABEL • FLAT ARTWORK

Food Supplement with Vitamin C and Zinc

Ingredients:

Vitamin C (L-ascorbic Acid), Bulking Agents (Dicalcium Phosphate, Microcrystalline Cellulose, Cross-linked Sodium Carboxymethylcellulose), Zinc (Zinc Oxide), Anti-caking Agents (Magnesium Salts of Fatty Acids, Fatty Acids, Silicon Dioxide).

Recommended daily intake: Take one tablet daily with water.

Each tablet provides:

Nutrient	Amount	% NRV
Vitamin C	100 mg	125%
Zinc	15 mg	150%

NRV = Nutrient Reference Value.

Do not exceed the stated recommended daily dose.
A varied, balanced diet and healthy lifestyle are important.
Food supplements should not be used as a substitute for a varied diet.
Store out of the reach of young children.
Best before end: See base of container.
Storage: Store in a cool, dry place.
Batch: See base of container.

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Sampleton • ZZ1 1ZZ • United Kingdom

Label element	Purpose
Food Supplement	Prescribed designation of the product.
Vitamin C & Zinc	Identification of the nutrients characterising the product.
120 tablets	Quantity declaration for a product sold by number.
Ingredients	Declaration of ingredients in descending order of weight, including appropriate additive functional classes and ingredient descriptions.
Recommended daily intake	Portion of the product recommended for daily consumption.
Each tablet provides	Quantitative declaration of vitamins and minerals, including NRV percentages.
Vitamin C immune-function claim	Authorised health claim, subject to the applicable conditions of use.
Recommended daily dose warning	Mandatory food supplement warning.
Varied-diet statement	Mandatory food supplement statement, combined with the diet and lifestyle information associated with the health claim.
Young-children warning	Mandatory food supplement warning.
Best before end	Date of minimum durability.
Storage instructions	Appropriate storage conditions.
Food business operator details	Identification of the responsible operator and postal address.

The example illustrates how general food information, food supplement-specific requirements and health-claim information can be integrated into a single label.

The presentation and positioning of the information must also satisfy the applicable artwork and legibility requirements.

9. Food supplement label checklist

The following checklist can be used during the preparation or review of food supplement pack copy.

It is not a substitute for assessing the complete formulation, intended markets and final artwork.

9.1 Core mandatory information

- ☐ Prescribed designation “food supplement” included.
- ☐ Characterising vitamins, minerals or other substances appropriately identified.
- ☐ Ingredients declared using appropriate names and in the required order.
- ☐ Relevant allergens declared and emphasised where required.
- ☐ Food additive functional classes and names or E-numbers correctly presented.
- ☐ QUID requirements assessed where relevant.
- ☐ Net quantity or quantity-by-number requirements satisfied.
- ☐ Date of minimum durability provided.
- ☐ Batch or lot identification provided where required.
- ☐ Appropriate storage conditions included where required.
- ☐ Responsible food business operator name and address included.
- ☐ Instructions for use included where required.

9.2 Food supplement-specific information

- ☐ Portion of the product recommended for daily consumption stated.
- ☐ Quantities of vitamins, minerals and other relevant substances declared per recommended daily portion.
- ☐ Vitamin and mineral NRV percentages correctly calculated and presented.
- ☐ Statement not to exceed the stated recommended daily dose included.
- ☐

Statement that food supplements should not be used as a substitute for a varied diet included.

- ☐ Statement to store out of the reach of young children included.

9.3 Additional requirements

- ☐ Ingredient-specific warnings and conditions assessed.
- ☐ Novel food conditions and additional labelling particulars assessed where applicable.
- ☐ Nutrition and health claims checked for authorisation and conditions of use.
- ☐ Accompanying information required for health claims included where applicable.
- ☐ Country-of-origin requirements considered where relevant.
- ☐ Market-specific requirements assessed for every intended destination.

9.4 Artwork and final verification

- ☐ Mandatory information is legible and meets applicable minimum font-size requirements.
- ☐ Required particulars appear in the correct field of vision where applicable.
- ☐ Text is clear, visible and indelible.
- ☐ Mandatory information is provided in the required language or languages.
- ☐ Final artwork has been compared against the approved pack-copy manuscript.
- ☐ All quantities, claims, warnings and ingredient names have been checked against the final product specification.

10. Northern Ireland, Ireland and EU considerations

The general principles described in this brief are relevant across the UK and EU, but the precise legal framework and market-specific requirements must be considered separately.

Area	Principal considerations
Great Britain	GB food supplement regulations, GB food information rules, applicable GB nutrition and health claims legislation, and other relevant domestic provisions.
Northern Ireland	Relevant EU food law under the Windsor Framework arrangements, alongside applicable UK provisions and market-access arrangements.
Ireland	EU food supplement and food information legislation, together with relevant Irish national requirements, including notification obligations where applicable.
Other EU Member States	EU harmonised legislation together with national provisions concerning notification, language, certain ingredients and other market-specific requirements.

Businesses should consider the intended market at an early stage of product development.

Differences in permitted ingredients, notification procedures, claims registers, mandatory warnings and language requirements may affect whether a single label can be used across several jurisdictions.

A product that is appropriately labelled for Great Britain should not automatically be regarded as ready for every EU market.

11. Principal legislation and references

The following instruments provide the principal legal framework relevant to this brief.

Great Britain

- Food Supplements (England) Regulations 2003, as amended.
- Food Supplements (Scotland) Regulations 2003, as amended.
- Food Supplements (Wales) Regulations 2003, as amended.
- Regulation (EU) No 1169/2011 on the provision of food information to consumers, as applicable in Great Britain.

- Regulation (EC) No 1924/2006 on nutrition and health claims made on foods, as applicable in Great Britain.
- Nutrition (Amendment etc.) (EU Exit) Regulations 2019, including relevant provisions concerning permitted vitamin and mineral sources.

European Union and Ireland

- Directive 2002/46/EC relating to food supplements.
- Regulation (EU) No 1169/2011 on the provision of food information to consumers.
- Regulation (EC) No 1924/2006 on nutrition and health claims made on foods.
- Relevant national legislation implementing or supplementing EU requirements.

These references should be consulted in their current applicable form, including relevant amendments.

Conclusion

Food supplement labelling requires the application of both general food information rules and legislation specific to food supplements.

A compliant label must identify the product appropriately, provide the required ingredient and operator information, communicate the recommended daily consumption and declare relevant nutrients and substances in the prescribed manner.

It must also include the mandatory food supplement statements and any additional particulars triggered by the formulation, claims or intended market.

Preparing accurate pack copy before artwork development can help businesses identify regulatory issues early, reduce avoidable revisions and establish a consistent basis for final label verification.

Food Cortex provides regulatory support for food and food supplement businesses, including formulation compliance reviews, pack copy creation and artwork compliance assessments.

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