foodcortex

COMPLIANCE BRIEF

Food Supplement Notification Requirements Across the EU

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

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At a glance

Article 10 of Directive 2002/46/EC permits Member States to introduce **national notification arrangements** for food supplements placed on their territories. The Directive does not establish an EU-wide product notification or marketing-approval system. Accordingly, a food business operator proposing to market a supplement in several Member States must identify the relevant national implementing law and filing procedure in each destination market.

- Notification is a **market-entry administrative obligation**, not normally an approval that the formulation is lawful or safe.
- Identify the Member State, responsible notifying operator, product version, required label and timing.
- Distinguish a first notification, a changed-product notification and a duplicate filing for an already notified product.
- Keep evidence of submission and any official reference number with the product's regulatory file.
- Check national language, ingredient, compositional and other restrictions **independently** of the notification process.
- Great Britain does not operate a general food supplement product notification scheme; **food business registration** is separate.

How to use this brief

The following overview explains the Article 10 mechanism and uses selected Member States to illustrate how notification procedures differ in practice.

1. EU legal basis and limits of harmonisation

Article 10 of Directive 2002/46/EC allows Member States, to facilitate official monitoring, to require the manufacturer or person placing a food supplement on their territory to notify the competent authority by forwarding a model of the label used for the product. It does **not** itself create one central EU notification portal or make every Member State use an identical procedure. [1]

The national implementing measure determines the scope and practical operation of notification, which may vary in its responsible person, timing, label-language requirements, documentary information, administrative fee and treatment of amendments. The first assessment should establish whether the proposed market requires notification and, if so, the applicable timing, responsible operator and documentation. Industry country profiles can provide useful screening leads but the operative requirement must be verified from the competent authority or legislation.

2. What notification does not prove

Notification is not a substitute for confirming vitamin/mineral sources, ingredient legality, novel food status, additive permissions, safety, label particulars or health claims. A product can be notified and remain non-compliant. In some countries the authority may review the label, raise objections or request supplementary material, but these procedural features must not be mistaken for universal approval. [1,2]

The same applies to a notification number displayed in a supplier catalogue: check that it relates to the correct product, formulation, operator and market and determine whether it remains current.

3. Ireland: FSAI notification

The Food Safety Authority of Ireland states that food supplements **marketed in Ireland for the first time** must be notified using its online form. The duty falls on the manufacturer if manufactured in Ireland or the importer if imported into Ireland. [2]

The FSAI advises that a prospective seller should establish whether the same product has already been notified by the relevant manufacturer or importer. Where an existing notification covers the product, a duplicate notification is not generally required; the seller should retain the relevant notification details. The FSAI also indicates that **reformulation or material relabelling, including changes to ingredient levels or claims**, can require a new notification. A change-of-address procedure should not be treated as equivalent to a general exemption for changed formulations or claims. [2,10]

This does not settle ingredient compliance, label accuracy or the operator's other food-law responsibilities. Ireland is part of the **EU**, whereas **Northern Ireland** is a separate UK jurisdiction applying relevant EU food law under the Windsor Framework and domestic enforcement provisions.

4. Italy: electronic notification and the national register

Italy operates an electronic notification system for food supplements through the Ministry of Health, implementing Legislative Decree No. 169/2004. The Ministry describes first notification through its electronic procedures, submission of the label and the responsible operator's role. [3,4]

The Ministry's electronic procedure requires a separate notification for each food supplement subject to the system. Official Ministry guidance states expressly that **notification is neither an authorisation nor an implicit approval of the product**; compliance with the applicable law remains the responsibility of the notifying food business operator. Administrative review, requests for clarification and inclusion on an official register must therefore be understood in the context of the national procedure and not marketed as a product approval. [3,4]

The Ministry also issued a 2026 communication concerning maintenance and accuracy of product entries, illustrating that notification administration may continue after the initial filing. A change in formula or market status should therefore trigger a check of any updated filing duties. [5]

5. Belgium: FOODSUP

Belgium's Federal Public Service Public Health provides **FOODSUP**, an online portal for notifying food supplements, fortified foods and certain foods for specific groups. Official guidance explains that access requires registration and, where applicable, authorisation for the local administrator. [6]

Check the Belgian competent authority's detailed conditions, product categorisation, notification number arrangements and any fee or documentation requirements at the point of filing. Availability of the portal does not imply that every ingredient or finished product is permitted.

6. France: current public administration route

French procedures have evolved. The DGCCRF's official Téléicare information now directs operators seeking to assess or declare food supplements to the government **Compl Alim** service. Do not assume that a legacy portal name or archived instruction remains the live route. [7]

Assess the current French declaration requirements and any ingredient constraints using the relevant official legal and administrative sources. The composition-screening functions of an electronic portal should not be equated with an independent legal approval of the product.

7. Notification and routes to market

The arrangements described for Ireland, Italy, Belgium and France are **illustrative national examples**, selected to demonstrate differences in regulatory procedure. Other Member States may impose different rules and should be assessed independently. Before entry into **each** additional Member State, check the ministry or national competent authority's current notification rules, official forms, submission channel, file requirements and fees.

Notification requirements may arise whether a supplement is marketed **direct to consumers, through retailers or through online marketplaces**. The method of sale does not, of itself, remove an obligation established by the destination market. Check whether a label-only variation, brand or SKU change, different daily dose, ingredient change or new responsible operator requires a new notification or an amendment. These details are national and should not be inferred from another country's practice.

EU free movement and, where applicable, mutual recognition must be considered in light of the specific harmonised legislation and lawful national measures. They do not dispense automatically with a national procedure established under Article 10. Where a Member State objects to a product marketed lawfully elsewhere, the legal basis and procedure for the restriction must be assessed separately; notification should not be presented as a substitute for that analysis.

8. Great Britain and Northern Ireland

England, Scotland and Wales do **not** have a general food supplement product notification scheme equivalent to Ireland's. This is separate from food business establishment registration and any product-specific approvals, for example regulated novel food authorisations. [8]

Do **not** automatically describe Northern Ireland as part of the GB position. Relevant EU supplement law continues to apply under the Windsor Framework, alongside Northern Ireland domestic provisions. Identify the actual NI requirements and supply route rather than extrapolating an Irish Republic filing to NI. [8,9]

9. Practical preparation for notification

Before entering a market, the operator should establish the competent authority's current procedure, identify which business is responsible for notification, prepare the relevant label and other required materials, and retain the submission acknowledgement or reference number where applicable. Existing notifications may need to be checked with suppliers or importers to avoid duplicate filings; any later changes to composition, label or responsible operator should be evaluated against the relevant national procedure.

This is an **administrative compliance step**, distinct from ingredient and label conformity. A notification receipt should not be presented to customers as an official certification of safety or an EU-wide permission to market the product.

10. Pre-entry notification checklist

- Intended EU markets are enumerated by country, not grouped into “EU” alone.
- Current official national notification basis and procedure are documented.
- Notifier’s identity and legal role have been confirmed.
- The product, label and language match the specific intended market.
- Ingredient and claims assessments are complete independently.
- Filing/fee/acknowledgement records are retained and version controlled.
- Duplicate or existing notification status has been checked.
- Formula, packaging, responsible operator and cessation changes trigger reassessment.
- GB establishment-registration and NI arrangements are addressed separately.

11. Official legislation and competent-authority sources

Only official authority and legislative sources are used below. Member State rules and portal procedures may change, so a **live check** is required before actual filing.

1. Directive 2002/46/EC, Article 10: food supplement notification
2. Food Safety Authority of Ireland: Food supplements and notification
3. Italy Ministry of Health: New notification of food supplement
4. Italy Ministry of Health: National register of food supplements
5. Italy Ministry of Health: Operator obligations, July 2026 notice
6. Belgium FPS Public Health: FOODSUP notification system
7. France DGCCRF: Official direction to Compl'Alim notification portal
8. UK Government: Food supplements legislation guidance
9. Food Supplements Regulations (Northern Ireland) 2003
10. FSAI: notified foods and re-notification after reformulation or relabelling

Conclusion

Notification is an important **national procedural obligation**, not a common EU licence to market. Businesses entering several European markets need a market-by-market filing plan, aligned with a separately documented regulatory assessment and a reliable system for tracking product changes.