

Position statement in relation to the nano-labelling obligations introduced in the Food Information for Consumers Regulation (EU No 1169/2011).

The above regulation requires that “all ingredients present in the form of engineered nanomaterials shall be clearly indicated in the list of ingredients” [Article 18(3)].

It defines an engineered nanomaterial’ as:

“any intentionally produced material that has one or more dimensions of the order of 100 nm or less or that is composed of discrete functional parts, either internally or at the surface, many of which have one or more dimensions of the order of 100 nm or less, including structures, agglomerates or aggregates, which may have a size above the order of 100 nm but retain properties that are characteristic of the nanoscale.” [Article 2(2)t]

Further, the Commission Q&A document on the commission Recommendation 2011/696/EU, indicates that the term ‘particle’ is intended to cover only nano-objects with a defined, rigid shape.

We hereby confirm that food grade cellulose derivatives (E460 to E469) offered in the EU by OFCA members are not ‘engineered nanomaterials’ as defined in Regulation (EU) 1169/2011 and consequently exempt from the above “nano” labelling requirements.