

## Labelling: Trade description and Sales description

### o **NATURAL MINERAL WATER**

Each Natural Mineral Water has a recognised and named source, which is registered in the Official Journal of the European Union. All production from the source must carry the name and location of the source on the label, and must have the same trade description. If the trade description of the NMW is different from just the name or location of the source, then either the name or the location of the source must be printed in letters at least one and a half times larger than any part of the trade description.

The Sales Description for natural mineral water must be one of the following:

- "Natural Mineral Water" referring to a still or non-effervescent product
- "Naturally Carbonated Natural Mineral Water" meaning an effervescent Natural Mineral Water whose carbon dioxide content is the same after bottling as it was at source
- "Natural Mineral Water Fortified with Gas from the Spring" meaning an effervescent Natural Mineral Water whose carbon dioxide content derives from the same ground water but the carbonation level after bottling is greater than that in the source
- "Carbonated Natural Mineral Water" meaning a sparkling Natural Mineral Water which has been carbonated at least in part with carbon dioxide from another origin.

Note that the words "Natural Mineral Water" may only be used on waters which have been recognized and registered in the Official Journal of the European Union. Even if a water satisfies all the criteria required for Natural Mineral Water but it does not have official recognition, not only can it not be sold as a Natural Mineral Water, but it must not be labelled in such a way that it could be confused with a specific Natural Mineral Water.

### o **SPRING WATER**

As with Natural Mineral Water, each Spring Water has a recognised and named source, although unlike NMW the source does not have to be officially registered with the EU. The name and location of the source and the same trade description must always appear on the label. If the trade description of the Spring Water is different from just the name or location of the source, then either the name or the location of the source must be printed in letters at least one and a half times larger than any part of the trade description. Because there is no official list of Spring Water sources, the bottler may change the name of the Spring Water at any time, but only one name may be used at any one time. For a Spring Water, the sales description is Spring Water with any reasonable qualifier such as "sparkling" or "carbonated". It should not include the words "natural" or "mineral" in order to prevent possible confusion with Natural Mineral Water.

- **BOTTLED DRINKING WATER (TABLE WATER)**

The legal name of the product is "water". The law requires the name to be sufficiently precise to inform the purchaser of the true nature of the food and to enable the food to be distinguished from products with which it could be confused, and can include a description of its use. The names "table water" or "bottled drinking water" are sometimes used. There is a general requirement that the consumer should not be misled, and that there should be no confusion with any natural mineral water or spring water.

### **Other mandatory information**

Other mandatory information on the labels of bottled waters includes the analytical composition (compulsory for natural mineral water, optional for spring waters), information on treatments - if any -, place of exploitation).

- **Composition**

A statement of analytical composition is mandatory only for Natural Mineral Waters. Bottled Drinking Waters and Spring Waters may not always have a stable enough composition to give a representative analysis, but often do. A re-mineralised bottled drinking water will normally have a stable composition by design.

An example format appears below:

| <u>Mineral Analysis</u>       | <u>mg/L</u> |
|-------------------------------|-------------|
| Calcium                       | 30          |
| Magnesium                     | 2           |
| Potassium                     | 2           |
| Sodium                        | 2           |
| Bicarbonate                   | 95          |
| Chloride                      | 12          |
| Sulphate                      | 25          |
| Nitrate (as NO <sub>3</sub> ) | 2           |
| Dry residue at 180°C          | 156         |
| pH (at source)                | 6.8         |

- **Place**

Place of exploitation for Natural Mineral Waters or Spring Waters or origin in general regulations for other waters.

- **Traceability**

The requirement to name the source, the packer and the lot mark means that a bottle of water is fully traceable to its origins and the day, even precise time, of bottling can be identified as added reassurance for consumers.

- The lot (batch) mark

The lot or batch mark provides a useful source of identification to enable product identification along the whole food chain. The size of the batch is for the packer to determine but, for waters, typically represents a day's production. Each container produced must carry a batch mark. The mark must be easily visible, clearly legible and indelible. The customer need not understand the meaning of the mark but must be able to distinguish it from other information on the label. A lot or batch mark is not required if an indication of minimum durability or "Best Before" date is used which includes the day as well as the month and year.

- Best Before

The words "Best Before" followed by a date up to and including that which the drink can reasonably be expected to retain its specific properties, if properly stored, together with any special storage instructions should be clearly stated. The date may be expressed in terms of a month and year only for drinks expected to retain their specific properties for more than three months and if the words "Best Before End" are used.

For drinks retaining specific properties for over 18 months the year only is sufficient if the words "Best Before End" are used. The date may be separate from the words "Best Before" or "Best Before End" if the words are followed by a reference to the place where the date appears.

Bottle labels often advise that products should be stored in a cool, dry, non-odorous place away from direct sunlight.

- Volume of package

The volume must be marked in letters of a certain size.

- Instructions for use and storage

Instruction for use and storage would be included on the label where necessary. Labels often advise consumers to store bottles in clean, cool and dry places.

- Origin

Name or business name and address of packer, manufacturer or seller in the EU must be marked on the pack

The country of origin should be clear.

- Nutrition labelling

Bottled waters are exempt from mandatory nutrition labelling.

- Infant labelling claims

Council Directive 2009/54/EC empowers Member States to introduce national rules in relation to the conditions of use for the claim “suitable for infant feeding”.

- Nutrition and Health Claims

Natural Mineral Waters may use the health claims listed in annex III of Council Directive 2009/54/EC relating to the exploitation and marketing of Natural Mineral Waters and EU Regulation 1924/2006.

- Name and address

Name or business name and address of packer, manufacturer or seller in the EU must be marked on the pack.