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## Legislative requirements for the labelling of dairy products in the European Union

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### ABSTRACT

The labelling of dairy products in the European Union is governed by a multi-layered legal framework combining horizontal food information rules, sector-specific market standards, hygiene requirements, and origin-related obligations. This article analyses the principal legislative requirements applicable to the labelling of milk and dairy products, with particular attention to mandatory food information, allergen communication, reserved dairy names, origin labelling, and the legal relevance of the concept of the primary ingredient. The article further examines recurring non-compliances identified in official control outputs across several EU Member States, particularly in the areas of undeclared milk allergens, incomplete mandatory particulars, misleading presentation, and origin-related ambiguity. The analysis is based on a qualitative review of EU legislation, official interpretative materials, and public outputs of competent authorities. The findings suggest that the legal framework itself is comprehensive, but practical compliance remains uneven due to the operational complexity of dairy supply chains, the legal sensitivity of dairy designations, and difficulties in implementing origin-related rules. The article concludes with recommendations for food business operators to strengthen compliance, traceability, and consumer protection in the dairy sector.

**Keywords:** dairy products, food labelling, European Union, milk, origin labelling, primary ingredient, allergen labelling, official controls

### 1 Introductions

Food labelling in the European Union is one of the core legal instruments through which food law protects consumers and supports fair market practices. For prepacked foods, the general framework requires that information provided to the final consumer be clear, accurate, visible, and non-misleading. These principles are of particular importance in the case of milk and dairy products, which are highly perishable, frequently consumed, nutritionally significant, and commonly associated with allergen, origin, and authenticity issues [1].

The general legal basis for food information in the EU is Regulation (EU) No 1169/2011 [2] on the provision of food information to consumers. Under this framework, prepacked dairy products must, as a rule, bear the name of the food, the list of ingredients, allergen information, the quantity of certain ingredients where required, date marking, the name and address of the responsible operator, the net quantity, any special storage conditions or conditions of use, instructions for use where necessary, and the nutrition declaration. In certain cases, the country of origin or place of provenance must also be indicated, especially where its omission may mislead the consumer or where the overall presentation of the food triggers origin-related obligations [3].

For dairy products, these horizontal requirements are supplemented by product-specific rules. Regulation (EU) No 1308/2013 [4] protects the legal use of terms such as “milk” and “milk products” and sets specific naming and compositional requirements for drinking milk. In addition, Regulation (EC) No 853/2004 [5] lays down specific hygiene-related labelling obligations for raw milk and certain products made with raw milk. Origin-related claims are further affected by Article 26 of Regulation (EU) No 1169/2011 and Commission Implementing Regulation (EU) 2018/775 [6], which govern the indication of the country of origin or place of provenance of the primary ingredient where it differs from that of the food.

As a result, dairy labelling in the EU is not governed by a single provision but by an interconnected system of food information law, market regulation, hygiene law, and official controls. At the same time, official control findings and public alerts show that practical compliance remains inconsistent, especially in relation to allergen communication, mandatory particulars, reserved dairy names, and origin-related information. This article therefore aims to provide a structured legal and practical analysis of the labelling of dairy products in the European Union [7].

### 1.1 Scientific hypothesis

The working hypothesis of this study is that the European Union has established a comprehensive legal framework for the labelling of dairy products, yet recurring deficiencies identified by competent authorities demonstrate that practical compliance remains inconsistent, particularly in the areas of allergen declaration, mandatory particulars, and origin-related information.

A secondary hypothesis is that the most frequent non-compliances do not arise from legislative gaps as such, but rather from the complexity of implementation, especially where the legal identity of dairy products, the concept of the primary ingredient, and the practical realities of sourcing and formulation intersect.

### 1.2 Objectives

The main objective of this article is to analyse the legislative requirements applicable to the labelling of milk and dairy products in the European Union and to identify the most common deficiencies detected through official control practice.

The specific objectives were:

- i. to systematise the EU legislative requirements applicable to dairy labelling, with particular emphasis on mandatory food information, allergen communication, reserved names, and raw-milk-specific wording;
- ii. to explain the legal relevance of the concept of the primary ingredient in dairy products and its role in origin labelling;
- iii. to interpret the practical decision-making model used in the dairy sector for voluntary origin communication;
- iv. to identify recurring deficiencies in dairy product labels, especially undeclared milk allergens, incomplete mandatory particulars, misleading presentation, and origin-related ambiguity;
- v. to discuss the implications of these shortcomings for consumer protection, traceability, and compliance management in the dairy sector.

## 2. Methods

This article was prepared as a qualitative legal and documentary analysis. The primary sources examined were EU legislative acts governing food information, market standards for milk and milk products, hygiene requirements for foods of animal origin, and origin-labelling rules. In particular, the analysis focused on Regulation (EU) No 1169/2011 [2], Regulation (EU) No 1308/2013 [4], Regulation (EC) No 853/2004 [5], and Commission Implementing Regulation (EU) 2018/775 [6].

In addition to legislation, the study used official interpretative and sectoral materials relevant to dairy labelling, including the European Dairy Association's guidance on voluntary origin labelling for dairy products and its policy documents on origin and front-of-pack nutrition labelling. These sources were not treated as legally binding norms, but as sector-specific interpretative materials reflecting practical implementation concerns [8], [9], [10].

The study also included a targeted review of publicly available outputs of competent authorities in selected EU Member States, including official annual reports, warning portals, food alerts, and authority guidance, in order to identify recurring deficiencies relevant to dairy labelling. Because Member States do not publish dairy-specific labelling infringements in a fully harmonised format, the comparative part of the analysis was based on a qualitative synthesis of official annual reports, public warning systems, and competent-authority guidance.

### 3. Results and discussion

#### 3.1 Core legislative requirements for the labelling of dairy products in the European Union

The labelling of dairy products in the European Union is primarily structured around the mandatory-information model established by Regulation (EU) No 1169/2011. For prepacked dairy products, the label must normally include the name of the food, the list of ingredients, allergen information, the quantity of certain ingredients where relevant, date marking, net quantity, storage conditions, the identity of the responsible food business operator, and the nutrition declaration [11].

The list of ingredients must be headed by the word “ingredients” and present the ingredients in descending order of weight. Quantitative declaration is required where an ingredient appears in the name of the food, is emphasised on the labelling by words, images or graphics, or is essential to characterise the food and distinguish it from similar products. In dairy practice, this may be relevant not only to milk itself, but also to cream, butter, cheese, or other ingredients that are central to the commercial identity of the product [12], and [13].

Allergen communication is one of the most sensitive aspects of dairy labelling [14]. Milk and products thereof are among the allergens listed in Annex II to Regulation (EU) No 1169/2011 and must be clearly emphasised in the list of ingredients. Where no ingredients list is required, the indication must still identify the allergen in accordance with the Regulation. This obligation is of particular practical significance because milk allergens may occur not only in obvious dairy foods, but also in compound foods, bakery products, confectionery, and products in which milk-derived substances are not necessarily obvious to consumers [15], [16], and [17].

Legibility is another essential element of compliance [18]. Mandatory particulars must be easy to see, easy to understand, and indelible. Minimum font-size requirements apply depending on packaging dimensions. Although these rules are horizontal and not dairy-specific, they are particularly important for dairy products sold in small formats, such as yoghurts, desserts, or portion-packed cheeses, where space constraints may increase the risk of inadequate presentation of mandatory information [19].

These rules show that the legal framework does not treat labelling as a merely formal requirement. In the dairy sector, food labelling functions simultaneously as a legal, informational, and safety-related interface between the producer and the consumer [20].

#### 3.2 Reserved names and specific labelling requirements for milk and milk products

The legal framework governing the labelling of milk and milk products in the European Union includes not only horizontal food information rules, but also product-specific provisions concerning the use of reserved names, sales descriptions, and additional mandatory statements for certain categories of dairy products. In this respect, Regulation (EU) No 1308/2013 plays a central role, as it establishes the legal protection of the terms used for milk and milk products and sets out specific naming rules for drinking milk. These provisions are particularly important because they determine which products may lawfully be presented as milk or milk products and under which conditions such designations may be used in commercial practice [21].

Regulation (EU) No 1308/2013 defines “Milk” as meaning “exclusively the normal mammary secretion obtained from one or more milkings without either addition thereto or extraction therefrom.” At the same time, the legislation permits the term “milk” to be used for milk treated without altering its composition or for milk the fat content of which is standardised, and in association with a word or words to designate the type, grade, origin and/or intended use of such milk or to describe the physical treatment or the modification in composition to which it has been subjected, provided that the modification is restricted to an addition and/or withdrawal of natural milk constituents. This legal formulation is fundamental because it confirms that the term “milk” is protected while also allowing certain qualified uses in which the product's essential nature remains within the dairy category.

The same Regulation defines “milk products” as meaning “products derived exclusively from milk on the understanding that substances necessary for their manufacture may be added, provided that those substances are not used for the purpose of replacing, in whole or in part, any milk constituent.” This definition makes clear that the legal identity of a milk product depends on its exclusive derivation from milk, although certain technologically necessary substances may be added during manufacture. However, such additions must not replace milk constituents either wholly or partially. This distinction is especially relevant in contemporary markets, where plant-based alternatives and composite foods frequently compete with traditional dairy products and may create labelling ambiguity if dairy terminology is used inappropriately.

An additional rule of practical relevance is that the species of animal from which the milk originates must be stated if it is not bovine. This means that, for milk from species such as goats, sheep, buffalo, or other animals, the label must explicitly identify that origin. This requirement is important for both product identity and consumer transparency, since the species of origin may affect nutritional composition, technological properties, sensory profile, and consumer choice.

Regulation (EU) No 1308/2013 further reserves a number of names exclusively for milk products. These include, among others, whey, cream, butter, buttermilk, butteroil, caseins, anhydrous milk fat (AMF), cheese, yogurt, kephir, koumiss, viili/fil, smetana, fil, rjaženka, and rūgušpiens. In addition, the protection extends to designations or names within the meaning of Article 17 of Regulation (EU) No 1169/2011 on the provision of food information to consumers. The legal consequence of this rule is that such names cannot be freely used for non-dairy foods or for products that do not meet the legal conditions applicable to milk products.

At the same time, the legislation allows a limited use of dairy terms in relation to composite foods. More specifically, the term “milk” and the designations used for milk products may also be used in association with a word or words to designate composite products of which no part takes or is intended to take the place of any milk constituent and of which milk or a milk product is an essential part either in terms of quantity or for characterisation of the product. This provision is important because it recognises that some foods are not pure dairy products but nevertheless legitimately contain milk or milk products as essential raw materials. The decisive condition is that no component of the composite product may replace a milk constituent.

A specific group of legal rules concerns the delivery of milk intended for the consumer without further processing. Regulation (EU) No 1308/2013 defines the following sales descriptions:

- whole milk: heat-treated milk which, with respect to fat content, meets one of the following requirements:
  - standardized whole milk: milk with a fat content of at least 3.50 % (m/m).
  - non-standardized whole milk: milk with a fat content that has not been altered since the milking stage, either by the addition or removal of milk fats or by mixture with milk, the natural fat content of which has been altered. However, the fat content may not be less than 3.50 % (m/m);
- semi-skimmed milk: heat-treated milk whose fat content has been reduced to at least 1.50 % (m/m) and at most 1.80 % (m/m);
- skimmed-milk: heat-treated milk whose fat content has been reduced to not more than 0.50 % (m/m).

These definitions are highly relevant for labelling practice because they determine the legal sales name that must appear on the packaging. Milk that does not comply with these fat-content categories may still be marketed as drinking milk, but only under a specific condition: the fat content is clearly indicated with one decimal and easily readable on the packaging in the form of “... % fat”. The legislation also expressly states that such milk must not be described as whole milk, semi-skimmed milk, or skimmed milk. This rule protects consumers from misleading categorisation and ensures that commonly used market descriptions correspond to harmonised legal standards.

The Regulation also specifies which compositional modifications are permitted for drinking milk. These include:

- a) in order to meet the fat contents laid down for drinking milk, modification of the natural fat content by the removal or addition of cream or the addition of whole milk, semi-skimmed milk or skimmed milk;
- b) enrichment of milk with milk proteins, mineral salts or vitamins;
- c) reduction of the lactose content by conversion to glucose and galactose.

However, the law adds an important labelling obligation in this context. Modifications in the composition of milk referred to in points (b) and (c) are allowed only if they are indelibly indicated on the packaging of the product so that they can be easily seen and read. However, such an indication shall not remove the obligation as regards nutrition labelling laid down in Regulation (EU) No 1169/2011 on the provision of food information to the consumer (FIC). This means that compositional modification must be communicated clearly and permanently on the package, while the standard nutrition declaration requirements remain fully applicable. Furthermore, where proteins are added, the protein content of the enriched milk must be 3.8 % (m/m) or more.

In addition to naming rules, Regulation (EU) No 1308/2013 lays down compositional criteria for drinking milk. It requires that drinking milk must:

- have a freezing point close to the average freezing point for raw milk recorded in the area of origin of the drinking milk collected;
- have a mass of not less than 1 028 grams per litre for milk containing 3.5 % (m/m) of fat at a temperature of 20 °C or the equivalent weight per litre for milk having a different fat content;
- contain a minimum of 2.9 % (m/m) of protein for milk containing 3.5 % (m/m) of fat or an equivalent concentration in the case of milk having a different fat content.

These technical criteria reinforce the legal identity of drinking milk and serve as objective benchmarks for product authenticity and market compliance.

Another important legal aspect concerns the use of reserved dairy names in relation to competing products. Although Regulation (EC) No 1234/2007 has been replaced by Regulation (EU) No 1308/2013, Decision 2010/791/EU remains in force. Regulation (EU) No 1308/2013 establishes the principle that the descriptions milk and milk products may not be used for products other than those described in Part III of Annex VII to the

Regulation. As an exception, this principle is not applicable to the description of products the exact nature of which is known because of traditional use and/or where the designations are clearly used to describe a characteristic quality of the product. Decision 2010/791/EU, therefore, retains practical significance because it lists products notified by Member States that may continue to use dairy-related terms despite not meeting the standard dairy definition, such as salad cream, cream crackers, or ice cream.

The legislation also makes clear that, in respect of a product other than those recognised as milk or milk products, no label, commercial document, publicity material or any form of advertising or presentation may be used which claims, implies or suggests that the product is a dairy product. This rule is central to fair market communication, especially in the context of plant-based alternatives and dairy-imitating products. At the same time, where a product contains milk or milk products, the designation “milk” or the relevant milk-product designations may be used only to describe the basic raw materials ingredients in accordance with Regulation (EU) No 1169/2011 (FIC). Thus, the legislation draws a clear boundary between lawful ingredient description and unlawful presentation of a non-dairy food as a dairy product.

A separate but highly relevant issue is the labelling of raw milk. Regulation (EU) No 853/2004 introduces additional mandatory wording for raw milk and certain products made from raw milk. It requires that, in addition to the requirements of Regulation (EU) No 1169/2011, the labelling must clearly show:

- a) in the case of raw milk intended for direct human consumption, the words ‘raw milk’;
- b) in the case of products made with raw milk, the manufacturing process for which does not include any heat treatment or any physical or chemical treatment, the words ‘made with raw milk’.

These wording requirements are particularly important because they communicate a product characteristic with direct implications for consumer safety, product handling, and informed choice. In dairy labelling practice, they therefore represent not only a formal obligation, but also a critical element of risk communication.

The legal regime for names reserved for milk and milk products demonstrates that the EU does not treat dairy terminology as purely descriptive commercial language. On the contrary, the use of terms such as “milk,” “cheese,” “butter,” or “yogurt” is legally regulated and linked to compositional authenticity, consumer protection, and fair competition. For food business operators, this means that product naming, origin indication, and ingredient description must be assessed together, especially where composite foods, modified milk, non-bovine milk, or dairy alternatives are concerned.

### 3.3 Origin labelling and the legal relevance of the primary ingredient concept

Origin labelling is one of the most legally and practically complex aspects of dairy labelling in the EU. Under Article 26 of Regulation (EU) No 1169/2011, the country of origin or place of provenance must be indicated where failure to do so could mislead the consumer as to the true origin of the food. In addition, Article 26(3), as implemented by Commission Implementing Regulation (EU) 2018/775, requires additional information when the country of origin or place of provenance of the food is given and differs from that of its primary ingredient [22].

This rule is especially relevant in the dairy sector because dairy products are often marketed through references to national or regional identity, while the milk or dairy ingredients used in the product may originate from a different country or from several Member States. In such cases, the legal question is not limited to where the final product was manufactured, but also extends to whether the consumer may be misled about the origin of the ingredient central to the food's identity.

The concept of the primary ingredient is therefore crucial. EU law defines the primary ingredient as either an ingredient representing more than 50% of the food or an ingredient usually associated with the name of the food by the consumer, and for which a quantitative indication is, in most cases, required. In dairy products, this may mean that the primary ingredient is not always limited to the single heaviest component. For example, in products such as yoghurt, cheese preparations, or flavoured dairy products, several dairy ingredients may be relevant to the consumer's understanding of the product identity [23].

The EDA (European Dairy Association) guidance on voluntary origin labelling provides a useful practical interpretation of this issue. It explains that if the origin of the food is voluntarily claimed, operators should verify that all dairy ingredients originate from that claimed origin. If not, they should determine whether one dairy ingredient exceeds 50% of the food, whether there are other dairy ingredients associated with the product name, and whether the label should therefore indicate the origin of the dominant dairy ingredient only, of all relevant dairy ingredients, or of a broader geographical area such as the EU. The guidance also clarifies that certain dairy-derived substances used in small amounts for technological reasons, such as milk proteins or caseinates, may not need to be treated as primary ingredients in the same way as milk, cream, or milk powder [14].

At the same time, not every geographical reference on a label automatically triggers the primary-ingredient rule [22]. The EDA document notes that certain indications, such as the operator's address, identification marks, geographical references contained in protected names, trademarks, or expressions such as “Greek style” or

“Spanish recipe,” are not necessarily to be considered voluntary origin information for the purposes of Implementing Regulation (EU) 2018/775. The decisive issue is whether the average consumer would understand the term, symbol, or image as indicating the origin or provenance of the food.

### 3.4 Voluntary versus mandatory origin labelling of milk and dairy products

The current debate on origin labelling of milk and dairy products in the European Union reflects a broader tension between consumer information, internal market principles, and supply-chain flexibility. According to the EDA position, voluntary origin labelling may be justified where it provides accurate and credible information to consumers and where operators are able to substantiate the claimed origin in practice. The dairy sector opposes additional mandatory origin-labelling measures at either the national or EU level, arguing that such requirements would go beyond proportionate consumer information and would create unnecessary legal, economic, and logistical burdens. This position is predicated on the existing regulatory framework, which already mandates origin indication in instances where its absence could mislead consumers regarding the true provenance of the food product or its primary ingredients [24]. Conversely, proponents of mandatory origin labelling often highlight consumer demand for greater transparency regarding food sourcing and the potential for such regulations to support local agricultural economies. This perspective posits that consumers have a right to know the origin of their food, allowing them to make informed choices that align with their values, such as supporting domestic producers or particular environmental standards [25]. Indeed, studies show that consumers are often willing to pay a premium for products with clear origin labels, especially when those origins are associated with specific quality attributes or ethical production practices [26].

A central argument advanced in the EDA material is that mandatory origin labelling is difficult to reconcile with the functioning of the EU Single Market and the principle of free movement of goods. The document refers to the case-law of the Court of Justice of the European Union, according to which origin-marking requirements may facilitate consumer bias in favour of domestic products and may make the marketing of products from other Member States more difficult. In the dairy sector, this issue is particularly sensitive because milk collection, ingredient sourcing, and processing are often organised across borders. As a result, mandatory origin rules may interfere with established patterns of division of labour and may encourage market fragmentation rather than transparency. Such fragmentation can lead to significant economic inefficiencies and increased operational costs for producers operating within an integrated European supply chain [8]. Furthermore, implementing mandatory Country of Origin Labelling transforms what was previously a quality differentiation signal for credence attributes under voluntary schemes into a regulatory intervention aimed at rectifying market inefficiencies caused by asymmetric information regarding product attributes like food safety [27].

The practical functioning of dairy supply chains further strengthens this concern. Milk and dairy ingredients are frequently sourced from different countries depending on availability, price, seasonality, and technological needs. The EDA document emphasises that resilient dairy supply chains depend on operational flexibility, especially in times of crisis. In this context, mandatory origin labelling is portrayed as a measure that would reduce adaptability, complicate sourcing, and undermine the capacity of the dairy chain to respond to disruptions. Therefore, from a sectoral perspective, voluntary harmonised origin communication appears more compatible with both market integration and realistic production conditions than a rigid mandatory regime. This perspective aligns with broader criticism of mandatory origin labelling, which suggests that such regulations may increase costs for processors across the supply chain, from farmers to consumers, and could inadvertently foster a preference for national products, thereby disrupting established international supply chains [8], [28].

### 3.5 Most frequent deficiencies in the labelling of dairy products and related products

The review of official control outputs from selected EU Member States suggests that the most frequent dairy-relevant labelling deficiencies are concentrated in a relatively small number of recurring categories. Although Member States do not publish harmonised dairy-specific annual labelling statistics in a uniform format, official annual reports, warning portals, and guidance materials indicate repeated problems with allergen communication, mandatory particulars, misleading composition or presentation, date marking, and origin-related ambiguity [17].

The most consistently documented problem is undeclared milk or inadequate allergen communication. Public recall systems and authority warnings in several Member States show recurring cases in which milk or milk-derived ingredients were present in the product but were not declared at all, or were not sufficiently emphasised as allergens. This type of non-compliance is particularly serious because it may directly affect allergic consumers and transform a labelling error into a food-safety issue [16].

A second recurring area of weakness concerns the improper use or insufficient precision of mandatory particulars. Although the legal framework clearly specifies the information required for prepacked foods, practical non-compliance can arise when labels omit essential storage conditions, present ambiguous product names, fail

to declare the quantity of a characterising ingredient, or do not present mandatory information in a sufficiently legible manner [29].

The comparison presented in Table 1 should be interpreted as a qualitative synthesis rather than a strict quantitative comparison, because the reporting formats and categories used by national authorities are not fully harmonised.

**Table 1** Common problems with dairy products food labelling based on official control findings.

Country	Official source usable for citation	What the official source shows	Best-documented dairy-labelling deficiency
Slovakia	ŠVPS SR official food-labelling guidance and monthly official-control reporting	Slovak official guidance stresses that label data must be correct, visible and non-misleading; allergens from Annex II must be declared and highlighted. Public control outputs are mainly monthly and not harmonised into a dairy-specific annual labelling table.	Incomplete mandatory particulars / allergen emphasis
Poland	GIS reporting and official public warnings	GIS publishes annual activity reporting, while official public warnings include cases where allergen-related information, including possible milk content, was missing or inadequate in Polish labelling.	Undeclared milk / missing allergen warning / inadequate allergen presentation
Hungary	NÉBIH recall portal and official dairy-labelling guidance	NÉBIH provides official milk-and-dairy labelling guidance and its recall system includes cases involving undeclared milk ingredients.	Undeclared milk ingredient / allergen labelling failure
Czech Republic	CAFIA annual reports and official enforcement cases	CAFIA explicitly supervises food safety, quality and labelling; its annual reports include labelling/quality inspection sections, and official cases show misleadingly labelled milk where declared composition did not match actual values.	Misleading composition/quality declaration and date-marking irregularities in dairy cases
Austria	AGES food-control reporting and guidance	Austrian official sources frame food control around misleading composition, shelf life, origin/provenance and allergen information; however, public reporting is mostly horizontal rather than dairy-specific.	Misleading presentation/composition and allergen-related labelling deficiencies
Germany	BVL labelling overview and lebensmittelwarnung.de	BVL explains that food labels must correctly communicate identity, origin, composition and shelf life, and the official warning portal publishes cases of undeclared milk or other allergen-labelling defects.	Undeclared milk allergen / non-compliant allergen labelling
France	DGCCRF annual report and RappelConso	French official public outputs include recall entries for dairy products with packaging errors leading to allergen-labelling defects and wrong use-by dates.	Allergen-labelling errors and incorrect date marking in dairy products
Spain	AESAN publications/alerts	Spain's annual official-control material is broad, but official alerts repeatedly include products where milk or milk components were present but not declared.	Undeclared milk / undeclared milk components in labelling
Belgium	FAVV/AFSCA annual report 2024 and 2024 recalls/warnings press release	Belgium's official 2024 reporting states that companies issued warnings mainly because allergens were not mentioned in the ingredients list, and some warnings also concerned wrong durability dates.	Missing allergen declaration and secondarily wrong durability/date information
Netherlands	NVWA year report/inspection results and allergen enforcement pages	NVWA's 2024 year overview is broad, but NVWA also reports that businesses too often provide insufficient allergen information and maintains dedicated allergen-labelling guidance.	Insufficient allergen information / non-compliant allergen labelling, including milk as a listed allergen
Denmark	Danish Veterinary and Food Administration recall database and labelling guidance	The official recall database contains dairy-relevant cases such as products where milk was not declared on the label, including recent entries.	Undeclared milk allergen due to mispacking or incorrect labelling
Slovenia	GOV.SI labelling guidance and dairy-specific labelling page	Slovenian official guidance states that food-label information must be accurate, unambiguous, clearly visible and not misleading; a dedicated page also explains milk and dairy naming/quality rules.	Misleading or inaccurate mandatory information, especially on identity, composition and dairy naming
Sweden	Swedish Food Agency allergen guidance and risk guide on undeclared allergens	Sweden's official material strongly centres allergen communication; the agency has specific guidance on undeclared allergens and lists milk among allergens requiring rigorous risk assessment and labelling control.	Undeclared milk allergen / inadequate allergen communication
Italy	Ministry of Health annual national control report and official recall notices	Italy's annual national control report is horizontal, but the Ministry's official recall notices include cases relevant to milk allergen communication.	Undeclared milk proteins / allergen non-compliance

In dairy foods, where shelf life, refrigeration, and differentiation between product types are critical, such shortcomings may significantly impair the consumer's ability to make an informed choice [20].

A third recurring issue is misleading composition or presentation. Official findings from some Member States include cases where the declared composition of milk did not correspond to the actual composition, or where the overall presentation of the food created a misleading impression as to quality or identity [30], [31].

A fourth category involves incorrect or unclear date marking, particularly in dairy-food recall cases. Given the perishability of many dairy products, date-marking non-compliance is especially important in this sector.

The origin-related ambiguity remains a significant issue [32]. When labels use national symbols, regional imagery, or wording that suggests a specific provenance, the actual origin of the milk or the primary dairy ingredient may not always align with the overall impression created by the label. This is precisely the type of situation in which Article 26 of Regulation (EU) No 1169/2011 and Implementing Regulation (EU) 2018/775 become operationally relevant.

### 3.6 Recommendations for practice

#### 3.6.1 Core Compliance Principles

Operators should begin every assessment with the overarching legal principle that food information must not be misleading [33]. This principle governs both the decision to use origin claims and the final wording on the label. When an origin claim is made, operators must immediately verify that the food's origin matches that of its primary ingredient. If they differ, Article 26 of Regulation No 1169/2011 is triggered, requiring the declaration of the primary ingredient's origin or an indication that it differs from the food's origin [33], [34]. Consequently, origin-related design decisions should never be decoupled from recipe analysis and raw-material traceability.

#### 3.6.2 Technical Identification of the Primary Ingredient

FBOs must identify the primary ingredient before developing any origin statement. A primary ingredient is defined as either representing more than 50% of the food or being the ingredient usually associated with the name of the food by the consumer [35]. For dairy products, this assessment cannot be limited strictly to percentages. Where multiple dairy components are linked to the consumer's understanding of the product, all may need to be taken into account. Therefore, labelling reviews should consider both formulation percentages and consumer perception of the product name [36].

A further technical distinction is required between primary dairy ingredients and dairy-derived substances added solely for technological purposes. Ingredients such as milk minerals, proteins (whey or caseinates), or milk powders added in small proportions for functional reasons should not automatically trigger primary-ingredient labelling requirements [14]. However, this tolerance must be applied cautiously and justified in the product file, particularly if the overall presentation could lead consumers to assume a broader dairy-origin claim.

#### 3.6.3 Procedural Implementation and Decision Models

Origin labelling should follow a structured decision-making model, such as the logic found in the European Dairy Association guidance. This involves a step-by-step verification:

1. Do all dairy ingredients originate from the claimed country?
2. If not, does one dairy ingredient exceed 50% of the food?
3. Are other dairy ingredients usually associated with the name of the food?

Following this logic, the label may need to show the origin of only the main ingredient, multiple associated ingredients, or all relevant dairy origins [7]. For products with complex sourcing, broader statements such as "EU" or "non-EU" may be used, provided the wording remains accurate and non-misleading. Companies should adopt standard internal wording templates for recurrent categories (e.g., plain yogurt, flavoured milk drinks) to reduce the risk of marketing-driven overstatements of national origin [37].

#### 3.6.4 Scope Management: Origin vs. Geographical References

Businesses must carefully distinguish true origin indications from geographical references that do not trigger the rules of Implementing Regulation 2018/775. The following are generally not considered voluntary origin information:

- Name and address of the operator or identification marks.
- Terms included in protected names or trademarks clearly linked to a producing company [38].
- Style descriptors such as "Greek style" or "Spanish recipe" [14].
- Generic denominations like Emmental, Camembert, or Gouda, which no longer function as provenance claims in the eyes of the consumer [38].

### 3.6.5 Evidence, Documentation, and Dynamic Review

Documentary substantiation is essential to compliance. FBOs should maintain updated supplier declarations, specifications for milk and dairy ingredients, batch traceability records, and evidence of the provenance used in the label claim [21]. This is critical for products manufactured using milk or cream sourced from multiple countries.

Finally, origin labelling must be reviewed dynamically rather than as a one-time exercise. Labels should be re-evaluated whenever sourcing patterns, recipes, or supplier portfolios change [39]. A robust compliance system should include periodic verification and pre-market legal review of any new origin claims to ensure they remain consistent with evolving EU interpretative guidance.

### 3.7 Front-of-pack nutrition labelling and the specificity of dairy products

Another important issue in dairy labelling concerns front-of-pack nutrition labelling (FOPNL). The EDA documents consistently support the provision of accurate and useful nutrition information to consumers, but they argue that any FOPNL scheme should remain voluntary, scientifically grounded, and harmonised at EU level. The rationale is that front-of-pack schemes should complement, rather than replace or distort, the existing nutrition declaration required under Regulation (EU) No 1169/2011. From this perspective, the objective of FOPNL should be to help consumers make better-informed dietary choices without oversimplifying the nutritional profile of complex foods such as milk and dairy products [10].

A key principle emerging from both EDA papers is that nutrition labelling should be aligned with food-based dietary guidelines. These guidelines form the basis of national nutrition policy and communicate not only restrictions, but also the recommended frequency and quantity of consumption of different food groups within a balanced diet. The EDA argues that a FOPNL scheme that fails to reflect this broader dietary context may confuse consumers and weaken trust in both nutrition policy and food labels. This concern is especially relevant for dairy foods, which are described in the documents as nutritionally complex foods that provide essential macro- and micronutrients, including calcium, protein, vitamins, and other beneficial components that may not be properly captured by simplified cross-category scoring models. Consequently, the EDA advocates for FOPNL systems that consider the specific nutrient contributions of dairy products to the diet rather than applying a universal algorithm [10]. This perspective highlights the need for FOPNL systems to accommodate the nuanced nutritional contributions of dairy within a balanced dietary framework, aligning with food-based dietary guidelines to prevent consumer confusion and maintain trust in nutritional guidance [9], [10].

The EDA therefore advocates a sub-category-specific approach to front-of-pack nutrition labelling. According to the position paper, dairy products should not be assessed only through broad, uniform criteria applied across all foods, because such an approach risks misrepresenting the nutritional diversity within the dairy sector itself. The documents explicitly note that categories such as yoghurt and cheese differ substantially in composition and nutritional role, and that a meaningful system should allow consumers to identify better options within those categories rather than comparing nutritionally dissimilar foods on the basis of a single simplified score. In this sense, FOPNL is considered acceptable only if it improves real dietary decision-making and if its public-health benefit can be demonstrated in practice [9].

### 3.8 Economic, environmental, and consumer-policy implications of additional labelling requirements

The EDA materials also provide a broader policy critique of extending dairy-labelling obligations, particularly with regard to mandatory origin labelling. One of the main arguments is that such measures may impose negative economic and environmental consequences without producing corresponding consumer benefits. The documents state that dairy production is characterised by multiple supply streams, frequent ingredient mixing, and technologically complex processing chains. Under such conditions, stricter origin-tracking obligations would require greater separation of milk flows, additional cleaning between batches, separate storage and production lines, more label changes, and additional packaging adjustments. These changes would increase administrative burden and production costs throughout the sector. This would ultimately translate into higher prices for consumers and potentially reduced product availability [40].

The environmental dimension is presented in a similarly critical way. According to the EDA position, mandatory origin rules would reduce production efficiency and sourcing flexibility, resulting in more transport movements, more energy use, more water consumption, and potentially more food and packaging waste. The argument is that a fragmented origin-based production model would conflict with broader EU sustainability objectives under the Green Deal and the Farm to Fork Strategy. In that sense, the issue is not framed merely as a labelling matter, but as a policy choice with implications for resource use, emissions, and the overall sustainability of the dairy chain. Furthermore, the EDA contends that such measures could disproportionately affect small and

medium-sized enterprises within the dairy sector, potentially hindering their competitiveness and market access due to the increased compliance costs associated with complex origin tracking and differentiated production processes. Beyond economic and environmental considerations, the efficacy of additional labelling requirements in delivering tangible consumer benefits remains a subject of debate [41].

The consumer-policy implications are equally important. The EDA paper refers to evidence suggesting that consumers often interpret origin information as a proxy for safety, freshness, healthiness, or environmental quality, even though such assumptions are not necessarily justified. The cited JRC review is presented as indicating that consumer interest in origin may be influenced by patriotism or ethnocentrism, while food safety and product quality are already harmonised at EU level. The papers on front-of-pack nutrition labelling stress that consumer-oriented label tools should be based on sound scientific evidence, accompanied by educational efforts, and periodically evaluated under real-life conditions. Taken together, these arguments imply that additional labelling requirements should not be introduced solely because consumers express an interest in more information; they should also be proportionate, evidence-based, operationally feasible, and capable of improving actual consumer decision-making [8].

### 3.9 Negative and absence claims in the labelling of dairy products

Another legally sensitive area in dairy labelling concerns negative or absence claims, i.e., statements indicating that a product does not contain certain undesirable substances or agents, such as contaminants, microplastics, pathogenic microorganisms, or substances not naturally occurring in milk. From a regulatory perspective, such statements fall within the category of voluntary food information and must therefore comply with the general requirements of Regulation (EU) No 1169/2011. In particular, voluntary information must not mislead the consumer, must not be ambiguous or confusing, and should, where appropriate, be based on relevant scientific data. The EDA specifically highlights the potential for misuse of negative claims, arguing that such claims can be misleading if they imply a superior quality or safety standard compared to other products when, in fact, the absence of a particular substance is a universal characteristic of that food category or is legally mandated [42].

In the case of dairy products, absence claims relating to safety are especially delicate because food safety is already a general legal obligation rather than an optional product benefit. Under Regulation (EC) No 178/2002, unsafe food shall not be placed on the market, while Regulation (EC) No 2073/2005 establishes microbiological criteria and compliance obligations for food business operators. Consequently, statements such as “does not contain pathogenic microorganisms” may be problematic if they imply that the product offers a special safety advantage beyond what is already legally required for all comparable foods. From this perspective, the absence of pathogenic microorganisms should normally be regarded as a baseline compliance expectation rather than as a differentiating marketing claim. Similarly, claims indicating the absence of substances such as hormones or antibiotics can be misleading if they suggest a unique characteristic, given that the use of hormones for growth promotion is prohibited in the EU, and milk containing antibiotic residues above maximum residue limits cannot be marketed [43].

A similar issue arises in relation to claims such as “free from contaminants” or “does not contain contaminants”, “does not contain microplastics.” Unless such wording refers to a clearly defined substance or category of substances, supported by reliable analytical evidence and communicated in a precise and proportionate manner, it may create a misleading impression that other products in the same category are likely to be contaminated. Such claims should therefore be approached with caution, especially where they merely restate compliance with general legal safety requirements. This applies particularly to substances like antibiotic residues, where stringent regulatory frameworks already mandate their absence above specified maximum limits in dairy products destined for the market [5]. The World Health Organization and the World Organization for Animal Health promote the “One Health” concept, which emphasizes the close relationship between humans, animals, and the environment [44].

The same caution applies to claims concerning microplastics. In the absence of a universally standardised regulatory framework for routine product-level “microplastic-free” communication, the use of statements such as “does not contain microplastics” may be difficult to justify unless based on validated analytical methods, clearly defined detection limits, and transparent interpretation criteria. Otherwise, the claim may be vulnerable to challenge as ambiguous, scientifically insufficiently substantiated, or potentially misleading for consumers. This is particularly relevant where the wording suggests absolute absence rather than analytical non-detection within a defined testing framework. Moreover, the analytical challenges associated with comprehensive microplastic detection across diverse matrices make such definitive claims problematic, particularly given the ongoing development of standardized methodologies and the complex interplay of environmental factors influencing microplastic presence [45].

Broader formulations such as “does not contain substances not naturally occurring in milk” should also be treated with caution. If the wording does not identify the substances concerned with sufficient clarity, the statement may be regarded as too vague to meet the standards applicable to voluntary food information. In practice, food business operators should avoid undefined negative claims and should use only those absence claims that are legally relevant, scientifically verifiable, and communicated in a precise and proportionate manner. Such claims must not overstate ordinary compliance with food law or suggest a special safety advantage where the absence of the substance concerned is already a general legal requirement. At the same time, a broader One Health perspective remains relevant when assessing food-safety communication, as responsible antimicrobial use in food-producing animals and coordinated management of zoonotic and antimicrobial-resistance risks are important public health considerations [46], [47], [48], and [49].

### 3.10 Relationship Between EU and National Legislation in the Categorisation and Labelling of Dairy Products

Although the labelling of dairy products in the European Union is largely governed by directly applicable Union legislation, the practical legal framework is not exhausted by EU regulations alone. In this field, it is necessary to distinguish between the harmonised rules laid down at EU level and the supplementary rules that may continue to exist at the national level. This distinction is important because dairy products are not regulated only as foods in general, but also as product categories with specific technological, compositional, and traditional characteristics. In practice, therefore, the legal assessment of a dairy label may require simultaneous consideration of both Union law and national legislation.

From the perspective of legal hierarchy, EU law takes precedence over conflicting national law. According to the principle of primacy of EU law, Member States may not maintain or apply national rules that contradict binding Union provisions. This principle applies to binding EU acts generally and ensures the uniform protection of consumers and the consistent functioning of the internal market throughout the Union. In the field of food information, this means that national rules cannot override or contradict the mandatory provisions of Regulation (EU) No 1169/2011, Regulation (EU) No 1308/2013, Regulation (EC) No 853/2004, or other applicable Union acts. At the same time, Regulation (EU) No 1169/2011 expressly recognises that Member States may adopt national measures concerning matters not specifically harmonised by the Regulation, provided that such measures do not prohibit, impede, or restrict the free movement of goods that comply with Union law.

This relationship is particularly relevant to the concept of the legal name of a food. Regulation (EU) No 1169/2011 provides that, in the absence of a name prescribed by Union provisions, the name of the food may be the name provided for in the laws, regulations, and administrative provisions of the Member State in which the food is sold to the final consumer or to mass caterers. Accordingly, national legislation may retain considerable practical importance in the categorisation of dairy products, especially where it specifies traditional product classes, compositional thresholds, technological distinctions, or reserved designations that are not fully harmonised at EU level.

A good example is the Slovak legal framework. In addition to the general EU rules, Slovakia applies Decree No. 343/2016 Coll. [50] on certain milk products, which regulates selected products made from cow’s, sheep’s, and goat’s milk. The decree does not replace Union law, but complements it by defining a number of dairy-product categories, technological processes, and naming requirements relevant to the Slovak market. It contains detailed definitions of products such as yoghurt, yoghurt with an alternative culture, kefir, fermented milk products, cream, cheese, whey cheeses, processed cheeses, bryndza, and other specific dairy categories. It also lays down detailed rules on fat content, dry matter, permitted naming practices, and mandatory wording in the name of the product, including where thermal treatment, fat level, or the milk species must be expressly stated.

In this sense, national legislation performs at least three important functions. First, it concretises general Union concepts for specific product groups placed on the domestic market. Second, it preserves and structures traditional dairy categories that have strong national or regional significance and that may not be described exhaustively in Union legislation alone. Third, it supplements the practical application of labelling law by linking specific product names to compositional and technological criteria. In the Slovak example, this is visible in rules determining when a product may be labelled as “smotanový” (cream-type), “tvarohový,” “jogurt,” “acidofilný jogurt,” “ovčia bryndza,” or “zmesná bryndza,” and in provisions requiring the indication of fat content, heat treatment, or the proportion of sheep cheese in certain products.

The legal significance of such national rules is limited by Union law. National measures may operate only within the space left open by harmonisation and must remain compatible with the principles of proportionality, legal certainty, and the free movement of goods. This is especially important in the dairy sector, where products may be manufactured in one Member State and lawfully marketed in another. In this respect, the Slovak decree itself reflects the internal-market dimension by stating that its requirements do not apply to products manufactured

or marketed in another EU Member State, in Turkey, or in a State of the European Economic Area, provided that they are lawfully marketed there. This illustrates that national dairy legislation must be interpreted not as an autonomous regulatory system standing above EU law, but as a complementary layer operating within the framework of Union law.

For food business operators, this means that legal compliance in dairy labelling often requires a two-step assessment. First, it is necessary to verify conformity with the directly applicable EU rules on food information, origin, hygiene, and reserved dairy designations. Second, it may be necessary to examine whether the Member State in which the product is marketed applies additional national provisions on categorisation, naming, composition, or sector-specific labeling of dairy products. This is particularly relevant for products with traditional names, specific fat-content classifications, fermentation-related designations, or nationally protected market categories. Therefore, from a practical and legal perspective, dairy labelling in the European Union should be understood as a multi-level system in which EU law provides the primary and superior framework, while national legislation may still play an important interpretative and product-specific role.

This interaction between Union and national law also has implications for official controls. Regulation (EU) 2017/625 requires Member States to organise official controls to verify compliance with food law, which in practice includes not only directly applicable Union provisions but also relevant national rules adopted within the limits allowed by EU law. As a result, the legality of a dairy label may depend not only on whether it complies with EU-wide mandatory food-information rules, but also on whether the product name and product classification are correctly used under the national law of the market in which the food is sold.

In addition, the relationship between EU and national dairy legislation is shaped not only by substantive labelling rules, but also by internal-market mechanisms designed to prevent unjustified trade barriers. Even where a Member State adopts detailed provisions on the classification, composition, or naming of dairy products, those rules must be interpreted in light of the principle of mutual recognition. Under this principle, goods lawfully marketed in one Member State should in principle be allowed on the market of another Member State, unless a restriction is justified by overriding public-interest grounds and complies with EU law. In parallel, EU law requires Member States to notify the European Commission of draft technical regulations before their adoption, so that potential trade barriers can be examined in advance. In practice, this means that national dairy rules are relevant not only because they define product categories and associated labelling obligations, but also because their legal effect depends on their compatibility with the wider framework of EU harmonisation, free movement of goods, and procedural transparency.

A further source of complexity is that national legislation often regulates dairy products not only through general food-information requirements, but through highly specific compositional and technological definitions that directly influence the lawful product name. In the Slovak context, Decree No. 343/2016 Coll. illustrates this clearly: it links the use of particular designations to precise criteria concerning fat content, dry matter, heat treatment, fermentation cultures, or the share of sheep cheese in bryndza, and thereby determines which terms may legally appear on the label. This shows that categorisation and labelling cannot be fully separated. Once a national rule defines what counts as “yogurt,” “cream-type,” “processed cheese,” or “sheep bryndza,” that categorisation immediately affects the legal name of the food and the mandatory accompanying particulars. For food business operators active in more than one Member State, the challenge is therefore not limited to translation of labels, but extends to adapting the legal name, descriptive wording, and product classification to the national dairy taxonomy of the target market. For this reason, compliance in the dairy sector should be understood as requiring continuous coordination between EU-level legal review and Member State-specific product-law assessment.

#### 4 Practical examples of dairy product labelling

This part of the article was prepared using information available for public at the [oznacovaniepotravin.sk](http://oznacovaniepotravin.sk) [51]. (foodlabeling) portal, operated by the Food Chamber of Slovakia with the support of the Ministry of Agriculture and Rural Development of the Slovak Republic. The practical examples shown in Figures 1–6 summarise, in a visual and product-specific form, the mandatory food information required for prepacked dairy products under Regulation (EU) No 1169/2011. As reflected in these model labels, dairy products must, as applicable, bear the name of the food, the list of ingredients, allergen information, the quantity of certain ingredients, the net quantity, the date of minimum durability or the “use by” date, any special storage conditions and/or conditions of use, the name and address of the responsible food business operator, instructions for use where necessary, and the nutrition declaration (Art. 9(1), Regulation (EU) No 1169/2011).

The figures also illustrate several detailed requirements that are particularly relevant for milk and dairy products. The name of the food must enable the consumer to identify the true nature of the product and, where omission could mislead the consumer, it must be accompanied by particulars relating to the physical condition or

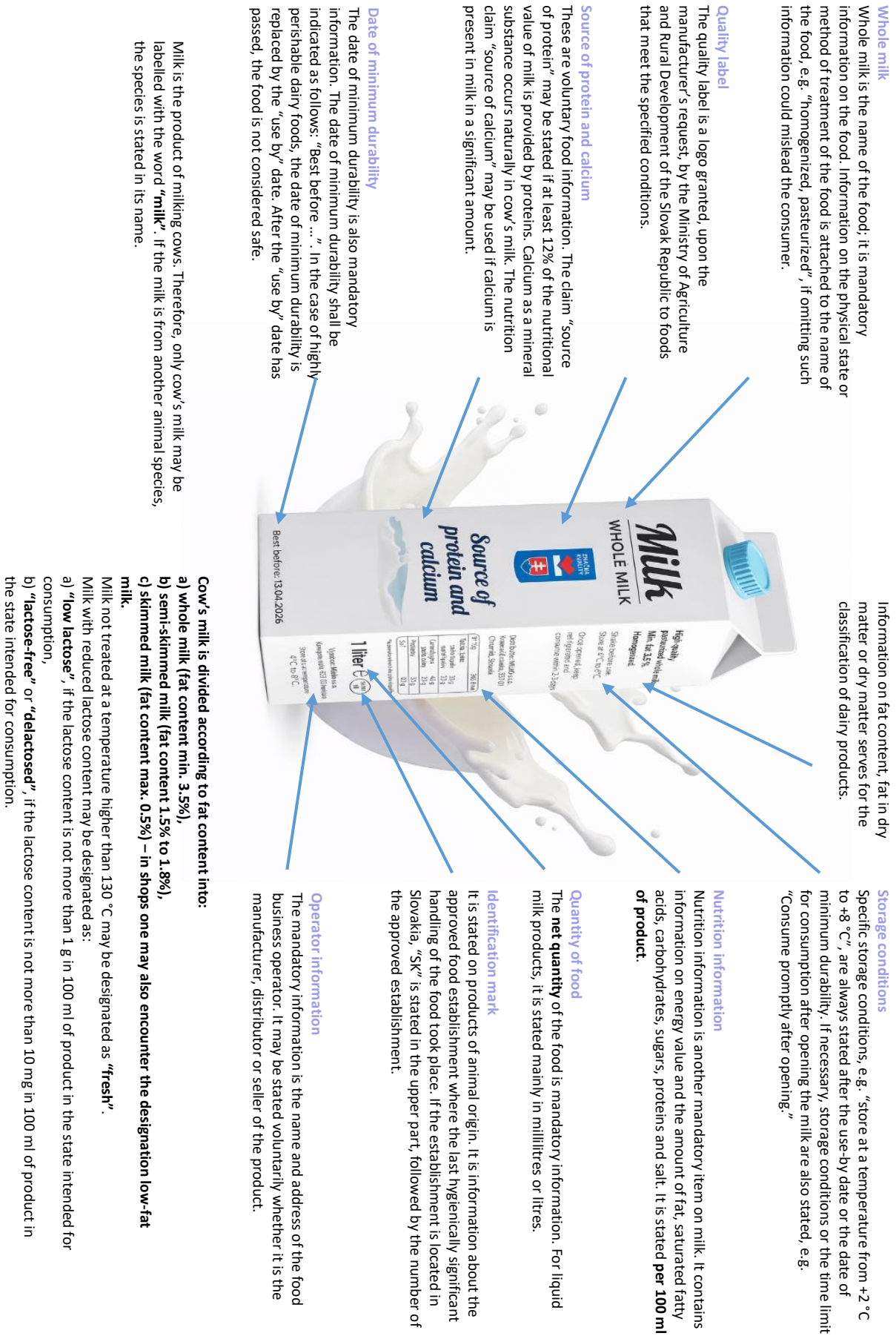
specific treatment of the food, such as pasteurisation, homogenisation, ripening, smoking, or packaging in a protective atmosphere. In the same way, the list of ingredients must be headed by the word “ingredients” and presented in descending order of weight, while substances causing allergies or intolerances, including milk and products thereof, must be clearly emphasised. Where an ingredient is referred to in the name of the food or highlighted by words, pictures, or graphics, its quantity must also be indicated (Art. 17; Art. 18(1); Art. 21(1); Art. 22(1); Annex VI, Regulation (EU) No 1169/2011).

These practical examples also show that dairy labelling is not limited to the formal presence of mandatory particulars, but also concerns the manner in which such information is presented. Regulation (EU) No 1169/2011 requires mandatory food information to appear directly on the package or on a label attached thereto and to be placed in a conspicuous position so that it is easily visible, clearly legible and, where appropriate, indelible. The Regulation further provides that such information must not be hidden, obscured or interrupted by other written or pictorial matter. This aspect is especially relevant for dairy products sold in smaller packages, such as yoghurt cups, cream containers, or portion-packed cheeses, where limited labelling space may increase the risk of reduced legibility (Art. 12(2); Art. 13(1)–(2), Regulation (EU) No 1169/2011).

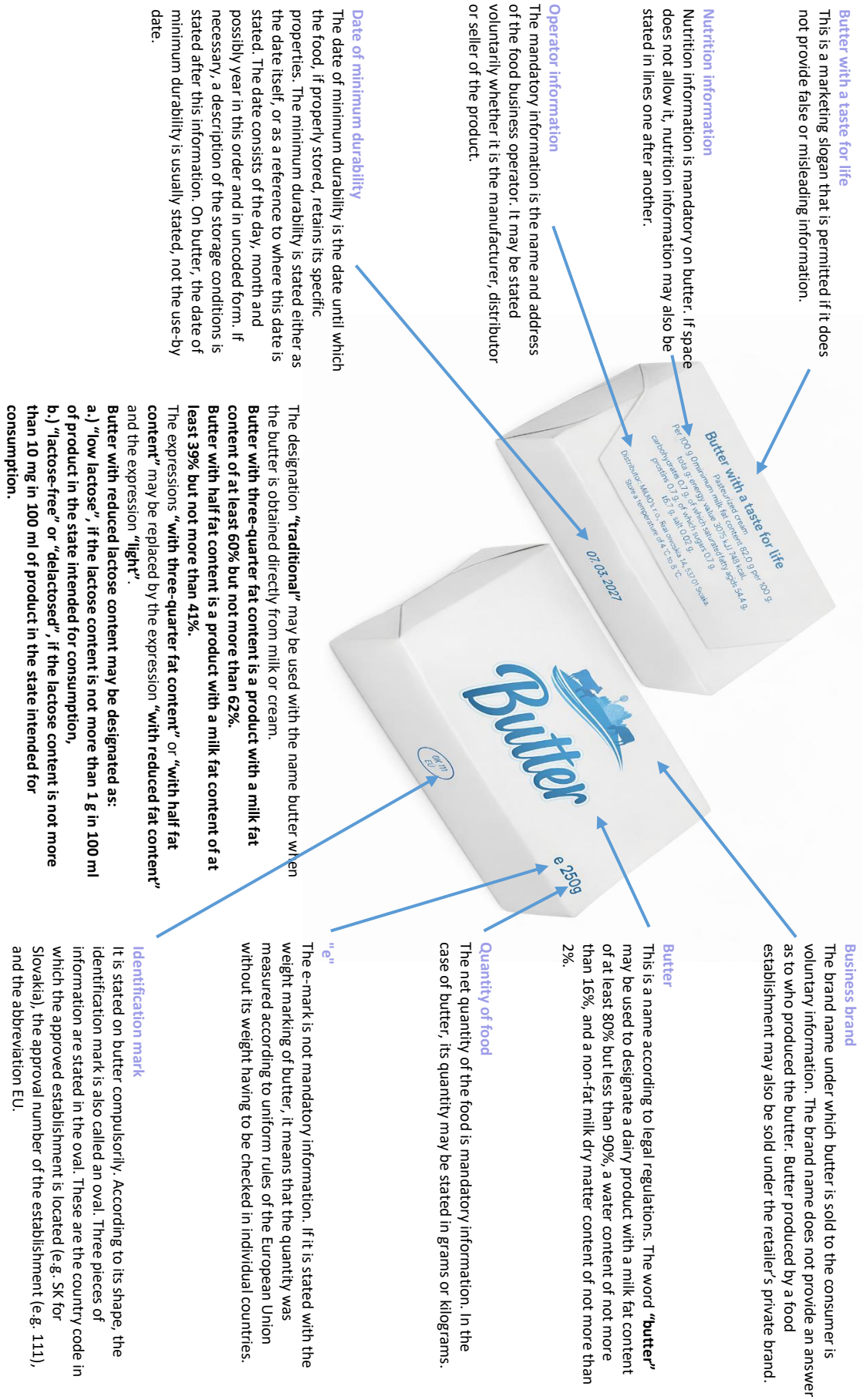
Date marking and storage instructions are also among the most important practical elements illustrated by the figures. Article 24 distinguishes between the date of minimum durability and the “use by” date, the latter being mandatory for foods which, from a microbiological point of view, are highly perishable and likely after a short period to constitute an immediate danger to human health. Annex X specifies that the date of minimum durability must be preceded by the words “Best before ...” or “Best before end ...”, whereas the “use by” date must be preceded by the words “use by ...”. In parallel, Article 25 requires the indication of special storage conditions and, where appropriate, the conditions of use or the time limit for consumption after opening. For refrigerated dairy foods, these particulars are of central importance because they directly affect both safe use and the consumer’s understanding of product durability (Art. 24(1)–(2); Art. 25(1)–(2); Annex X, Regulation (EU) No 1169/2011).

The figures further demonstrate that the practical communication of food information in the dairy sector involves not only mandatory particulars, but also the relationship between mandatory and voluntary information. Quality marks, slogans, and selected nutrition-related claims may appear on dairy packaging, but such information must not mislead the consumer, must not be ambiguous or confusing, and must not be displayed to the detriment of the space available for mandatory food information. In this respect, the model labels presented in Figures 1–6 show that compliant dairy labelling is based not only on the inclusion of the required legal particulars, but also on their truthful, balanced and intelligible presentation to the consumer (Art. 7(1)–(2); Art. 36(2); Art. 37, Regulation (EU) No 1169/2011).

These practical examples do not merely reproduce commercial packaging design, but provide a concise visual summary of the principal labelling obligations applicable to milk and dairy products placed on the EU market. They show how the structure of Regulation (EU) No 1169/2011 can be translated into product-specific labelling practice and how legal requirements relating to identity, composition, allergens, durability, storage, and presentation are communicated to consumers in an accessible form.



**Figure 1** Whole milk labelling example.



**Figure 2** Butter labelling example.

**Strawberry cream yogurt**

For unambiguous identification, the food must be labelled with a name. In this case, it is a name according to legal regulations. Yogurt may be designated as cream yogurt if the amount of fat in the milk component is at least 10% by weight. If the yogurt is flavoured, the name of this flavouring component must also be stated in the yogurt name, for example by the expression “strawberry”.

**Allergenic ingredients**

In the composition they are highlighted so that they are clearly distinguished from the other ingredients.

**Fat in the milk component at least 10%**

On the labelling of yogurts, which are fermented milk products, the amount of fat in the milk component in % by weight must be stated.

**Use-by date**

On yogurts that spoil quickly, the use-by date is stated. On the packaging, we may encounter a sentence that refers to where the use-by date is located on the packaging, for example on the lid. After the use-by date has passed, the yogurt may not be consumed, it is not considered a safe food.

**Storage conditions**

The storage conditions of the food must be stated after the use-by date. Dairy products must be stored in a refrigerator.

**Nutritional information**

Nutrition information is mandatory on dairy products. It represents average values per 100 g, stated in a table one below another or, if space does not allow, in lines one after another.



**Operator information**

The information on the responsible food business operator in the format business name and address must be stated compulsorily. It may be stated voluntarily whether it is the manufacturer, distributor or seller of the product.

**Identification mark**

It is stated on products of animal origin. It is information about the approved food establishment where the last hygienically significant handling of the food took place. The identification mark does not

In food shops one may also encounter yogurts made from sheep's milk or goat's milk. The labelling of these yogurts must state that it is sheep's yogurt or goat's yogurt. If the yogurt does not contain such a designation, it is yogurt made from cow's milk.

In the labelling of yogurts with an alternative culture, together with the word “yogurt” there must also be an attribute designating the alternative culture, for example “acidophilic yogurt” or “bifidus yogurt”.

In the name of yogurt, verbal designation of the amount of fat may also be used, namely “cream”, “with reduced fat content”, “low-fat” or “skimmed”. If a food ingredient is depicted verbally, pictorially or graphically on the packaging of the food (e.g. strawberry), its

Figure 3 Strawberry yogurt labelling example.

**Edam**  
This is the trade name of a natural cheese under which it is sold in food shops.

**Portioned slices, unsmoked**  
The name of the food must be supplemented by accompanying information on the state or specific treatment of the food if omission of this information could mislead the consumer.

**Semi-hard ripened semi-fat cheese**  
For unambiguous identification, the food must be labelled with a name. At the same time, the classification of the cheese according to the amount of water in fat-free matter, the method of ripening, and the amount of fat in dry matter must be stated.

**Fat content, dry matter**  
Natural cheeses are characterised by the amount of fat in percent by weight and the amount of dry matter in percent by weight. This information must be stated on the label.

**Composition**  
Information on the composition of the food is stated with the word “**composition**”, followed by a list of the food ingredients. Substances causing allergies or intolerances must be highlighted in the composition of the food.

**Operator information**  
The information on the responsible food business operator in the format business name and address must be stated compulsorily. It may also be supplemented by information on whether it is the manufacturer, distributor or supplier.

**Storage conditions**  
Natural cheeses must be stored in a refrigerator. On natural cheeses, storage conditions after opening the packaging and the shortened time limit for consumption of this food are also usually stated.

**Packed in protective atmosphere**  
If the food was packed using packaging gases that extend its shelf life, this information must be stated on the food packaging.



**Nutrition information**  
Nutrition information is mandatory on dairy products. It represents average values, stated in a table one below another or, if space does not allow, in lines one after another.

**Natural cheeses have a high protein content. This is a nutrition claim that may be stated if at least 20% of its energy value is provided by proteins.**

Natural cheeses are divided according to the amount of water in fat-free matter into extra-hard, hard, semi-hard, semi-soft and soft. Natural cheeses are divided according to the method of ripening into ripened cheeses, unripened cheeses – fresh, and cheeses in brine. Natural cheeses are divided according to the amount of fat in dry matter into high-fat, full-fat, semi-fat, low-fat and fat-free.

A list of ingredients is not stated on cheese if no ingredient other than dairy ingredients, food enzymes and cultures of microorganisms necessary for production, or in the case of cheese other than fresh cheese and processed cheese other than salt necessary for its production, was added to the product.

**Date of minimum durability**  
The date of minimum durability is the date until which the food, if properly stored, retains its specific properties.

**Weight**  
Information on the quantity of the food is mandatory information and, for natural cheeses, is stated in grams or kilograms.

**Identification mark**  
This is an identification mark informing about the approved establishment in which the last hygienically significant handling of the food took place.

**Figure 4** Edam cheese labelling example.

**Full-fat bryndza**

For unambiguous identification, the food must be labelled with a name. In this case, it is a name according to legal regulations – full-fat bryndza, which was made from sheep cheese and cow cheese. If

**Fat in dry matter min. 48%. Dry matter min. 44%.**

Bryndza is characterised by the amount of fat in percent by weight and the amount of dry matter in percent by weight. This information

**Identification mark**

The identification mark informs about the approved establishment in which the last hygienically significant handling of the food took

**Composition**

On the labelling of bryndza, the amount of sheep lump cheese in percent by weight must be stated compulsorily. The information is usually stated in the composition. Substances causing allergies or

**Use-by date**

Bryndza spoils quickly and therefore the use-by date is stated on it. After the use-by date has passed, it may not be consumed; it is not

**Storage conditions**

The storage conditions of the food must be stated after the use-by date. Bryndza must be stored in a refrigerator. On bryndza, storage conditions after opening the packaging and the shortened time limit for consumption of this food are also usually stated.

**Made for:**

The information on the responsible food business operator in the format business name and address must be stated compulsorily. This information may also be supplemented by information that in the given case it is the seller for whom the bryndza was made and who



**Energy**  
On the front side of the packaging, the **energy value per 100 g** of product from the nutrition information table stated on the food packaging

**Weight**  
Information on the quantity of the food is mandatory information and is stated on bryndza in

**Nutritional information**  
Nutrition information is mandatory on dairy products. It represents average values stated in a table one below another or, if space does not allow,

We distinguish two types of bryndza – **sheep bryndza**, which is made only from sheep cheese, and **mixed bryndza**, which is made from sheep cheese and cow cheese. In mixed bryndza, there must always be at least 50% by weight of sheep lump cheese from the dry matter.

**Slovak bryndza** is a protected geographical indication within the European Union **Quality Policy**. These foods must meet certain qualitative parameters that distinguish them from other similar products by precisely defined requirements for their raw material composition and technological production process.

A **dairy product** may be designated by a name derived from the word base of the

**Figure 5** Bryndza labelling example.

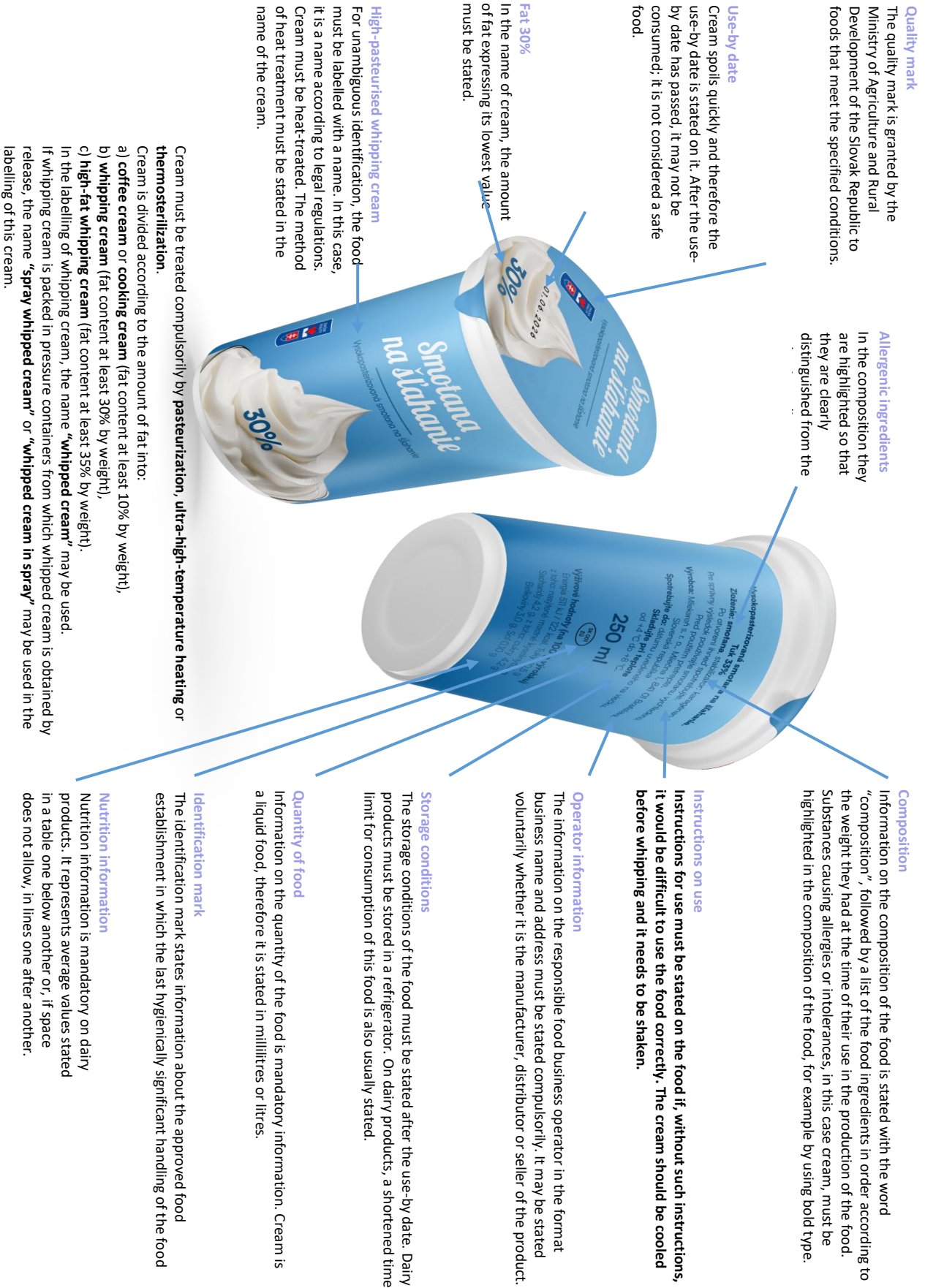


Figure 6 Whipping cream labelling example.

## CONCLUSION

The analysis confirms that the labelling of dairy products in the European Union is governed by a comprehensive and multi-layered legal framework. Regulation (EU) No 1169/2011 provides the horizontal basis for mandatory food information, while Regulation (EU) No 1308/2013, Regulation (EC) No 853/2004, and Implementing Regulation (EU) 2018/775 add sector-specific requirements concerning dairy designations, raw-milk wording, and origin-related communication. The study further shows that the legal challenge in dairy labelling lies less in the absence of rules than in the complexity of their practical implementation. This is particularly evident in the areas of allergen communication, reserved dairy names, the relationship between the claimed origin of the food and the origin of its primary dairy ingredient, and the operational management of multi-origin supply chains. Official control outputs indicate that recurrent deficiencies continue to concern undeclared milk allergens, inadequate emphasis of allergenic ingredients, misleading composition or presentation, incomplete mandatory particulars, and origin-related ambiguity. These shortcomings are significant not only from the perspective of formal legal compliance, but also in relation to consumer safety, trust, and traceability. For food business operators, correct dairy labelling should therefore be understood as an integral element of regulatory compliance and quality management. Accurate documentation, careful assessment of primary ingredients, legally sound use of reserved dairy names, and regular review of labels in response to sourcing changes are essential to ensure that dairy products are presented to consumers in a lawful, transparent, and non-misleading manner.

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