businesscompanion
trading standards law explained

Labelling of prepacked foods: ingredients list

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In this guide, the words 'must' or 'must not' are used where there is a legal requirement to do (or not do) something. The word 'should' is used where there is established legal guidance or best practice that is likely to help you avoid breaking the law.

Although the United Kingdom left the European Union (EU) in 2021, certain pieces of legislation (known as 'assimilated law') continue to apply until such time as they are replaced by new UK legislation, revoked or permitted to expire. This means that our guidance still contains references to legislation that originated from the EU.

This guidance is for Scotland

This guidance relates to prepacked food only.

'Prepacked food' is defined in assimilated Regulation (EU) No 1169/2011 *on the provision of food information to consumers* as "... food and the packaging into which it was put before being offered for sale, whether such packaging encloses the food completely or only partially, but in any event in such a way that the contents cannot be altered without opening or changing the packaging ...".

The definition of prepacked does not cover food packed on the sales premises at the consumer's request; nor does it cover food that is sold from the premises on which it was packed, or from a mobile stall or vehicle being operated by the packer (referred to as 'prepacked for direct sale'). For more information, see 'Labelling of non-prepacked foods' and 'Labelling of prepacked-for-direct-sale foods'.

List of ingredients

Most prepacked foods must have an ingredients list.

The list must be headed by the word 'ingredients', followed by a list of all the ingredients in descending order by weight at the mixing bowl stage of production. This means that the list goes from those ingredients that weighed the most to those ingredients that weighed the least when they were included in the product. There are a few exceptions to this.

Mixtures of spices and herbs where none specifically predominate, and any other ingredient that makes up less than 2% of the finished product, can be placed at the end of the list.

Compound ingredients

Compound ingredients are ingredients that are made up of more than one ingredient. All the components of the compound ingredient must be declared in brackets immediately after the compound ingredient appears in the ingredients list, and the list must be in descending order of weight. For example, Toad in the hole: 'Ingredients: Batter (Water, Wheat Flour, Whole Egg, Egg White, Rapeseed Oil, Skimmed Milk Powder, Salt, Emulsifier: Soya Lecithin)'.

It is best practice for any additives that are in the compound ingredient to be presented as part of the bracketed list, rather than at the end of the main ingredients list. This could be either:

- At the end of the bracketed list
  or
- In descending order of weight with the other ingredients in the bracketed list

Any compound ingredient with a composition controlled by product-specific legislation (chocolate, jam, honey, etc) that makes up less than 2% of the finished product does not need to be broken down into its components.

Water

Water must be included in the ingredients list, unless it has been used only to reconstitute a dehydrated ingredient.

If the water is intended to be drained away (tuna in brine, for example), it does not need to be declared in the ingredients list.

Additives

Additives must be included in the ingredients list like any other ingredient. If an additive makes up 2% or more of the finished product, it must be declared in descending weight order, as above. For additives that make up less than 2% of the finished product, it is best practice to group them all together at the end of the list.

Even though you may not knowingly use additives, they may be present in the ingredients you are using. Make a careful check of any packaging or documents that come with your ingredients, because you must ensure that any additives they contain are declared.

Format of declared additives

You must declare the functional category of the additive (what it does), followed by the specific name of the additive or, if appropriate, the additive's E number. For example:

- Preservative: sorbic acid
- Preservative: E200

You may use whichever method you prefer. Using both the name and the E number (for example, 'preservative: sorbic acid E200') would not confuse consumers or make the information unclear, although the Regulation does not list this as an alternative option.

The Food Standards Agency (FSA) website contains the list of approved additives and E numbers.

If your product includes several additives from the same category, you only need to state the category once and then list each additive from that category.

If an additive fits into multiple categories, choose the main purpose for its inclusion and declare it as that category.

You may not consider some ingredients to be additives; however, if an ingredient has been included for a 'technological purpose' (in other words, for what it does rather than how it tastes or the nutrients it provides) then you must declare it as an additive. For example, baking soda would be declared as 'Raising agent: sodium bicarbonate'.

If you are naming the additive rather than using its E number, you must give the name in full and not abbreviate - for example, 'monosodium glutamate' rather than 'MSG'.

Colours

Colours are a type of additive, and therefore follow the rules above. If you use certain colours in your food, you must include specific warnings. The amounts of some colours are strictly controlled, while others are non-permitted.

For full details, please see 'Colours and other additives in food'.

Sweeteners

Sweeteners are a type of additive; therefore, they follow the above rules. Please refer to the FSA's list of approved additives and E numbers for sweeteners that can be used in food (referred to as 'permitted sweeteners').

Aspartame

If aspartame is in the product, you must state the following on the label: 'Contains a source of

phenylalanine'.

If you have only declared the E number rather than the name 'aspartame' in the ingredients list, you must use the following statement rather than the one above: 'Contains aspartame (a source of phenylalanine)'.

Polyols

Polyols are a type of carbohydrate-based sugar-free sweetener. If your product is made up of more than 10% added polyols, you must state: 'Excessive consumption may produce laxative effects'.

Sweeteners are included on the approved additives list under their name rather than their type. You will therefore need to research whether the sweeteners you are using are polyols.

Foods that do not need an ingredients list

The following foods do not require an ingredients list:

- Fresh whole, unpeeled, fruit and vegetables (including potatoes)
- Carbonated water (that states that it is carbonated)
- Vinegar containing no added ingredients
- Cheese, butter, fermented milk and cream with no added ingredients (other than the ones needed to make them, such as bacterial cultures, salt in the case of cheese, etc)
- Foods that are made up of a single ingredient, and the name of the ingredient is stated in the name of the food
- Beverages with an alcoholic strength greater than 1.2%

Products that do not have an ingredients list must still highlight the presence of allergenic ingredients. For more information, please see 'Food allergens and intolerance'.

You may voluntarily provide an ingredients list where none is required. If you choose to do so, you must comply with all of the above requirements.

Further information

There are many requirements for prepacked food. Please see our other guides on the subject:

- 'Labelling of prepacked foods: general'
- 'Labelling of prepacked foods: nutrition declaration'
- 'Labelling of prepacked foods: product name'
- 'Labelling of prepacked foods: QUID'

Trading Standards

For more information on the work of Trading Standards services - and the possible consequences of not abiding by the law - please see 'Trading Standards: powers, enforcement and penalties'.

> In Scotland, food labelling laws are not generally enforced by Trading Standards services, but rather by Environmental Health. However, we have included In-depth Guides on food for Scotland

> in order to provide more comprehensive guidance.

In this update

The 'Format of declared additives' section has been changed to add clarity about using both the name and the E number of an additive in a declaration.

Last reviewed / updated: April 2026

Key legislation

- Food Safety Act 1990
- Assimilated Regulation (EC) No 1332/2008 *on food enzymes*
- Assimilated Regulation (EC) No 1333/2008 *on food additives*
- Assimilated Regulation (EC) No 1334/2008 *on flavourings and certain food ingredients with flavouring properties for use in and on foods*
- Assimilated Regulation (EU) No 1169/2011 *on the provision of food information to consumers*
- Food Additives, Flavourings, Enzymes and Extraction Solvents (Scotland) Regulations 2013
- Food Information (Scotland) Regulations 2014

Please note

This information is intended for guidance; only the courts can give an authoritative interpretation of the law.

The guide's 'Key legislation' links go to the legislation.gov.uk website. The site usually updates the legislation to include any amendments made to it. However, this is not always the case. Information on all changes made to legislation can be found by following the above links and clicking on the 'More Resources' tab.

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