



EUROPEAN COMMISSION  
DIRECTORATE-GENERAL FOR HEALTH AND FOOD SAFETY

Food and feed safety, innovation  
E1- Food information and composition, food waste  
Head of Unit

07.06.2018

Brussels,

SANTE/E1/SP/ez (2018)3008803

Anexo 2018 2978763

Dear Ms Kettlitz,

Dear Ms Hervé,

**Subject: Questions on the interpretation of the FIC Regulation regarding the labelling of engineered nanomaterials**

I thank you for your letter of 20 April 2018 related to the labelling of engineered nanomaterials (EHN).

In accordance with Article 18(3) of Regulation (EU) No 1169/2011 on food information to consumers (FIC Regulation), all ingredients present in the form of engineered nanomaterials shall be clearly indicated in the list of ingredients of a food, the names of such ingredients having to be followed by the word 'nano' in brackets.

Engineered nanomaterials are defined in Article 3(2)f of Regulation (EU) No 2015/2283 on novel foods as *any intentionally produced material that has one or more dimensions of the order of 100 nm or less or that is composed of discrete functional parts, either internally or at the surface, many of which have one or more dimensions of the order of 100 nm or less, including structures, agglomerates or aggregates, which may have a size above the order of 100 nm but retain properties that are characteristic of the nanoscale.*

The combined reading of these two provisions implies that only intentionally produced nanomaterial ingredients have to be followed by the word 'nano' in brackets in the list of ingredients.

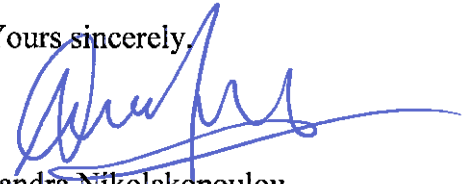
Article 20 (b), (c) and (d) of the FIC Regulation lays down exemptions for food additives and food enzymes and carriers and substances from being included in the list of ingredients. The same exemptions also apply when these are in the form of engineered nanomaterials.

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Ms M. Hervé, Secretary General,  
Ms B. Kettlitz, Director  
Fooddrink Europe  
Avenue des Nerviens 9-31  
B-1040 Brussels

As far as testing methods are concerned, the Joint Research Centre is currently working with Member State laboratories to develop and validate appropriate methods for the identification and characterisation of engineered nanomaterials in foods.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Alexandra Nikolakopoulou', with a long horizontal flourish extending to the right.

Alexandra Nikolakopoulou