



LABELLING GUIDELINES

For ACETO BALSAMICO DI MODENA PGI

May 2024

PRELIMINARY CONSIDERATIONS

The purpose of this document is to sum up any information that may help to produce labels for Aceto Balsamico di Modena PGI (Balsamic Vinegar of Modena); it covers the currently compulsory elements and formalises the principles of interpretation for the assessment of labels that are subject to the authorisation procedure under the Control Plan.

These Guidelines help to understand the special regulations that apply to Balsamic Vinegar of Modena (BVM), mainly EU Reg. no. 2024/1143, EC Reg. no. 583/09, (EU) Reg. no. 2023/512, the BVM manufacturing specifications and the attendant Control Plan, as well as all the applicable ministerial notices, memos and rulings that may have been issued since the Designation was registered.

Because of the nature of this document, it is clear that its contents are not exhaustive or final and, as such, they can be completed or changed if the interpretation thereof becomes outdated. The Consorzio di Tutela (Producers' Association) is entitled to ask the Ministry for advice on the interpretation thereof, if in doubt.

PURPOSE

According to the Control Plan, the authorisation for BVM labels provided by the Consorzio di Tutela only applies to special BVM labelling rules, and does not concern the conformity of labels in their entirety, under the applicable EU and national laws.

In the event of a binding regulatory change outside of the scope of these Guidelines, the relevant methods and timelines will be notified to the companies from time to time, so they can start to apply for the new approvals.

The labelling criteria, which we will detail in the next sections, shall apply to all customer communication media, such as brochures, fair literature, websites and social platforms, which can be checked out even if no preliminary approval is needed.





SCOPE

Designation

1. The registered Designation is “Aceto Balsamico di Modena”: it must be mentioned at least once in Italian;
2. It must be complete, unchanged and give a feeling of general consistency;
3. Different fonts or layouts are acceptable, on condition a straight layout is shown at least once (at the front or back);
4. The Italian Designation must always be followed by the phrase “Indicazione Geografica Protetta” (Protected Geographical Indication) in full or as an acronym, “IGP” (PGI):
5. Translations of the registered Designation such as *Balsamic Vinegar of Modena* are acceptable but, in this case, the translated Designation cannot be followed by the phrase at point 4 above or its acronym;
6. The translation of the phrase at point 4 above or its acronym, such as PGI, is acceptable, provided it follows the Italian Designation, “Aceto Balsamico di Modena PGI”.

(cf. EU Reg. no. 2024/1143, Art. 37, point 6)

European Union logo

1. The European Union logo is compulsory (EU Reg. no. 2024/1143, Art. 37, point 2, letter b, and EU Reg. no. 664/2014, Art. 2);
2. It must be shown in the same field of view as the Italian Designation, inclusive of the phrase (EU Reg. no. 2024/1143, Art. 37, point 3);
3. The instructions for use and the Pantone’s graphic design can be consulted at:

http://ec.europa.eu/agriculture/quality/schemes/logos/index_en.htm.

Producer’s name

1. The producer’s name must be compulsorily mentioned, pursuant to EU Reg. no. 2024/1143, Art. 37, point 5, paragraph one. Subject to any further provision, for the label to be approved such requirement is met by mentioning the name of the producer even just once.



2. Under paragraph four of the same Article, *“Agricultural products and spirit drinks that are marketed under a geographical indication, which were labelled before 14 May 2026, may continue to be placed on the market without complying with the obligation to indicate the name of the producer or operator in the same field of vision as the geographical indication, until existing stocks are exhausted.”*

Address of the Factory

1. The full address of the **bottling plant** shall be mentioned on the package; in countries whose national regulations do not lay down such requirement, the code assigned by CSQA to the packaging company, e.g. *Bottling plant: CSQA no. XXXXXX*, may be mentioned instead. Such information can be translated into the language of the country in which the product is sold. Note that the CSQA number is always a 6-digit code, with the last digit identifying the operational headquarters.
2. At any rate, note that, pursuant to EU Reg. no. 1169/2011, the name or the registered name and the address of the food business operator must compulsorily be mentioned.

Ministerial definition

1. In addition, the presentation of the product must include the phrase: *“Certificato da Organismo di Controllo autorizzato dal Ministero competente”* with the word ITALIA or the Italian flag, as suggested by the Instructions for Use of the Italian Ministry of Agriculture; different recommended versions of such phrase are shown in the document. The phrase can be translated into the language of the country in which the product is sold.

Aging

1. A product aged for at least three years and certified as such can be labelled as **“invecchiato”**, translated if need be (“aged” in English);
2. The phrase at point 1 above can be completed by mentioning the minimum aging time, which can be translated into the language of the country in which the product is sold. Acceptable examples can be:
 - Invecchiato 3 anni (Aged 3 years);
 - Invecchiato almeno 3 anni (Aged at least 3 years);
 - Invecchiato per un periodo minimo di 3 anni (Aged for a minimum of 3 years);
 - Invecchiato oltre 3 anni (Aged over 3 years).



Adjectives and numbers

1. No adjectives may be used, not even in a numerical form;
2. «extra», «fine», «scelto», «selezionato», «riserva», «superiore», «classico» («Extra», «fine», «exclusive», «selected», «Riserva», «superior», «classic») or **other, similar adjectives** are strictly forbidden;
3. The word “tradizionale” (“traditional”) and any derived word, in Italian or translated, are always watched out for as they might be suggestive of the DOP. This requirement applies to the entire graphic layout of the product: in particular, the phrase “metodo tradizionale” (“traditional method”) in connection with the typical production method instead of the IGP is not acceptable. In addition, the overall assessment of the label will cover other features as well, such as its iconographic features (e.g. a set of barrels in progressively smaller sizes...);
4. As to numbers, it is forbidden to mention the percentages of the ingredients. Exceptions may be made for bottles sold on the markets of some specific countries in which the local regulations require that such percentages be mentioned.

The list of countries in which labels have been approved as an exception currently includes:

- South Korea;
 - Israel;
 - Malesia and Thailand;
 - Serbia.
5. The prohibition to use numbers is not applicable:
 - To the date of foundation of the company, which is mentioned next to the company’s registered address or logo;
 - To trademarks, on condition the number is clearly **unrelated** to the product or to the manufacturing process and is instead expressly and simultaneously associated with some other feature.

Analytical and sensory parameters

1. The product’s analytical and sensory parameters, as provided by descriptors under Art. 2 of the “Consumer features” specifications, may be described, on the following conditions:
 - They cannot be more visible than the Designation (the maximum height must not exceed 75% of the smallest letter of the Designation);



- They must be separated from the Designation either by a space or by a graphic distinction.
2. Only the adjectives listed in Art. 2 of the Specifications or adjectives from the same semantic fields (technical or narrative) may be used to describe the sensory parameters;
 3. The adjectives mentioned at point 2 above may only be used in close connection with a feature (e.g. brown colour, lasting aroma, sweet and sour flavour). Such combinations are not essential in marketing texts on labels.

Product segmentation

1. Corporate and/or shared segmentation systems (e.g. *Consortium Profile*) may be used, on condition they are accepted by the Authorisation Office as compatible with the Specifications and the Control Plan.
2. Corporate and shared segmentation systems can co-exist.
3. Reference can be made to precious metals: such references (e.g.: gold, platinum, etc.) must be expressly associated with some other element (label, range, seal ...) to make sure they do not act as substantial qualifications of the Designation (e.g.: *Balsamic Vinegar of Modena GOLD*).
4. The same applies to any reference to colours or colour palettes; special care must be taken when using colours that may be associated with the product (e.g.: black, brown, red, light), and therefore the chosen graphic layouts must not create any confusion, particularly if colours are used as invented names.

Examples:

- Balsamic Vinegar of Modena *Red Seal* – YES
- Balsamic Vinegar of Modena *Green* – NO
- Aceto Balsamico di Modena PGI *Gold Label* – YES
- Aceto Balsamico di Modena PGI *Gold* – NO

Claims

1. **Claims** may be made, on condition they bring attention to some **uncommon** feature and are **demonstrable**. *Common* features are those listed in the Specifications and in the industry regulations for all product categories (e.g. “aged in wood”, “preservative-free”).
2. Any mention of a specific geographical area (e.g. *only grapes from Modena*) or of a specific varietal (such as *from Lambrusco grapes*) must apply to all ingredients (the must and the vinegar);



3. The words **Guarantee/Method** are not acceptable unless they are commercial guarantees (e.g. “money-back guarantee”) and unrelated to the Designation;
4. Claims or advertising texts that describe the manufacturing method in incomplete or ambiguous or incorrect ways (such as: “this ABM is made from cooked grape must, aged in wooden barrels ...”, without mentioning the vinegar) may have to be changed or completed.

Invented names

1. Invented names added to the Designation and to any other statutory notice are acceptable, on condition they will not create confusion with the product’s features or nature.

“Edition” packages

1. “Special”, “limited” or similar editions for products that are produced in very small numbers or within a specific timeframe (e.g. for Christmas or special anniversaries) or for specific clients (restaurants, chefs...) are acceptable;
2. The overall graphic layout must suggest that the distinctive features **do not concern the product**. In addition, a sense of proportions with the other phrases on the bottle must be kept;
3. **Co-branding** is acceptable too, on the same terms (e.g. “Special selection for Gucci”).

Umbrella brands

In the Ministry’s interpretation, the so-called “umbrella brands” may be used on BVM bottles even if they contain elements that are expressly forbidden by Art.8 of the Specifications or by the above paragraphs of these Guidelines, if the following conditions are met:

1. “Umbrella brand” means the brand of a product range that is closely related to the Distributor, available on a wide range of products in different categories, and known to consumers (e.g. “Carrefour Selection”);
2. If no close connection between the brand and the Distributor is clearly apparent on the label, the Designation must be properly separated either by a space or by a graphic interruption (e.g. the “Deluxe” brand and the name of the supermarket, Lidl, mentioned only on the back, separately);
3. The Office may request the company to complete the documentation by submitting the registration of the trademark and providing evidence of the differentiation of the product category of the brand.



Nutri-Score

1. By Board Resolution dated November 2022, labels with the FOP Nutri-Score logo are not acceptable.

Use of the words of the Designation outside of it

1. The words “Aceto” (“Vinegar”) and “Modena” may be separately mentioned on the label, but the way in which they are used will be specifically assessed.
2. The word “Balsamico” (“Balsamic”) may not be used outside of the Designation.
3. In descriptive texts, if the full Designation (Italian or translated) is already shown in the same field of view, a partial version of the Designation may be used and, if needed, translated: “Balsamico di Modena” (“Balsamic of Modena”).

APPROVAL PROCEDURE

According to the current procedure, the labels must be emailed to the Consorzio at autorizzazioni@consorziobalsamico.it in .pdf, .doc, .docx format or as images.

The applications must include the entire graphic layout of product, as presented to the final consumer, namely:

- Primary packaging: front and back labels, any pendants or stickers placed on the container (bottle, single serving);
- Secondary packaging (if available and sold): container (box) with the primary packaging, including any fixed or removable part;
- If there is a QR Code on the package, provide the contents it directs to;
- Italian or English translations if different languages are used.

VALIDITY

These Guidelines sum up the existing assessment criteria and, as such, they are immediately valid.

Backlog management

1. Authorisations previously issued for labels that do not comply with these requirements will automatically lapse and must therefore be assessed and approved again.
2. In the circumstances mentioned in points 3 and 4 of *Product Segmentation*, point 1 of *Claims*, point 3 of *Use of the words of the Designation outside of it*, all the stocks **must be disposed of**, and the



labels must be brought into compliance with the new rules within **2 years** of receiving the Guidelines (by May 2026);

3. Special or unexpected circumstances will be assessed on a case-by-case basis.

Guidelines

The above criteria apply to all the communication channels between the company and the consumer, even if they do not need to be approved.

These Guidelines will be constantly updated, and revisions thereof will be distributed to all the parties concerned in due time.

This document will be produced, updated and distributed in Italian, English, French, German and Spanish and will be posted on the Consorzio's website at www.consorziobalsamico.it and on the forthcoming platform.

Contact details

For info or further explanations:

autorizzazioni@consorzibalsamico.it

vigilanza@consorzibalsamico.it