



LABELLING GUIDELINES FOR ACETO BALSAMICO DI MODENA PGI (BALSAMIC VINEGAR OF MODENA)

MAY 2025 - REVISION 1



Table of contents

1. PRELIMINARY CONSIDERATIONS	3
2. SCOPE OF APPLICATION	3
3. MANDATORY ELEMENTS	4
3.1. Name	4
3.2. European Union logo	4
3.3. Bottling plant.....	5
3.4. Name of the producer and of the food business operator	5
3.5. Ministerial definition.....	5
3.6. Container capacity	6
4. REGULATED ELEMENTS.....	6
4.1. <i>Invecchiato</i> and <i>riserva</i> (aged and reserve)	6
4.2. Adjectives and numbers.....	7
4.3. Analytical and sensory parameters.....	7
4.4. Product segmentation.....	8
4.5. Claims	8
4.6. Invented names.....	9
4.7. Special bottles/packages.....	9
4.8. Umbrella brands.....	9
4.9. Nutri-Score	10
4.10. Use of the words of the name of the geographical indication outside of it	10
5. APPROVAL PROCEDURE	10
6. VALIDITY.....	11
6.1. Backlog management.....	11
6.2. Closing notes	11

1. PRELIMINARY CONSIDERATIONS

The purpose of this document is to sum up all information that may be useful to make labels for Aceto Balsamico di Modena PGI (Balsamic Vinegar of Modena); it covers both currently mandatory elements and formalises the interpretation principles adopted to assess the labels that are subject to the authorisation procedure under the Control Plan.

These Guidelines provide the interpretation of the special regulations that apply to Balsamic Vinegar of Modena (BVM), having specific regard to Regulation (EU) 2024/1143, Regulation (EC) No 583/2009, Implementing Regulation (EU) 2023/512, the BVM Production Specifications and the related Control Plan, as well as all the applicable ministerial notes, circulars and rulings that may have been issued since the name of the geographical indication was registered.

Because of the nature of this document, it is clear that its contents are not exhaustive, nor final and, as such, they can be supplemented or changed if the interpretation of the references given above becomes outdated. The Protection Consortium is entitled to ask the competent Ministry for opinions on the interpretation thereof, in case of any doubts.

The Consortium shall give its approval after assessing the elements described herein; the responsibility for ensuring full compliance with all applicable legislation, regulations and standards on food labelling, such as truthfulness and accuracy of any and all other information given in the label shall lie directly and exclusively with the food business operator concerned; if any are needed, the accuracy of any translations provided by packers shall be their own responsibility. All approvals given are store in the Consortium's records and shall be full and admissible proof in case of any disputes.

2. SCOPE OF APPLICATION

The authorisation of BVM labels shall apply to the labelling of BVM intended for supply to the final consumer or mass caterers (see Regulation (EU) No 1169/2011, at Article 6), and, therefore, to all containers in which BVM is distributed for direct consumption (see Production Specifications, at Article 8).

In accordance with the Control Plan, the authorisation for BVM labels provided by the Protection Consortium shall only apply to special BVM labelling rules, and does not concern full compliance of labels in their entirety with all the applicable EU and national legislation and regulations.

Having regard to any changes due exclusively to mandatory alignment to the applicable legislation and regulations outside of the scope of these Guidelines, the methods and timelines to apply for the new approvals shall be notified each time.

The labelling criteria, which are exhaustively described in the next sections, shall apply to all consumer communication material, channels and media, such as brochures, trade fair material, websites and social media, for which no preliminary approval shall be needed, although they may be subject to controls.

3. MANDATORY ELEMENTS

3.1. NAME

- 3.1.1. The registered name is “Aceto Balsamico di Modena”: it shall be stated in the label at least once in Italian.

The name shall be in full, unchanged and give a feeling of general consistency and harmonisation.

Different fonts or layouts are acceptable, on condition that a straight layout is shown at least once (at the front or back).

- 3.1.2. The name in Italian shall always be followed by the phrase “Indicazione Geografica Protetta” (Protected Geographical Indication) in full or as an acronym, “IGP” (PGI):

- 3.1.3. Translations of the registered name (such as *Balsamic Vinegar of Modena*) are acceptable but, in this case, the translated name shall not be followed by the phrase given at point 3.1.2 or its acronym.

The translation of the phrase at point 3.1.2. or its acronym (such as PGI, g.g.A.) is acceptable, provided it follows the Italian name, “Aceto Balsamico di Modena PGI”.

- 3.1.4. In accordance with the 2025 Production Specifications, in the name, the size of the “Modena” toponym shall be the same as, or bigger - up to three times bigger - than the size of the «Aceto» and «Balsamico» terms. This shall be verified comparing the height of the uppercase and lowercase letters in the term “Modena” with the higher uppercase and lowercase letters between “Aceto” e “Balsamico”. The main name and all repetitions and any translations shall be assessed in this way, each one of them separately. Considering the many different cases that may occur, in case of any doubt it is recommended that a preliminary verification be made with the Authorisation Office.

3.2. EUROPEAN UNION LOGO

- 3.2.1. The European Union symbol is mandatory (Regulation (EU) 2024/1143, Article 37(2)(b), and Delegated Regulation (EU) No 664/2014, at Article 2); it may be used in the different languages provided for by the Regulation and may appear more than once on the package or bottle.

- 3.2.2. It shall be located in the same field of vision as the full name in Italian, inclusive of the phrase given in point 3.1.2 (Regulation (EU) 2024/1143, Article 37(3));

The rules of use and the Pantone’s graphic design can be consulted at:

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

3.3. BOTTLING PLANT

- 3.3.1. The full address of the **bottling** plant shall be stated on the package or bottle; in countries whose national legislation and regulations do not lay down such requirement, the bottling plant may be stated using the code assigned by CSQA to the packer, e.g. *Bottling plant*: N. CSQA XXXXXX. Such information may be translated into the language of the country in which the product is to be sold. Note that the CSQA number is always a 6-digit code, with the last digit identifying the operational headquarters.

3.4. NAME OF THE PRODUCER AND OF THE FOOD BUSINESS OPERATOR

- 3.4.1. As of 14 May 2026, the name of the producer shall mandatorily appear in the labelling, in accordance with Regulation (EU) 2024/1143, Article 37(5), first paragraph; labels can already be aligned.

TRANSITIONAL NOTE Under Article 37(5), fourth paragraph *“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.”.*

The requirement concerning the name of the producer shall be deemed complied with if the name of the producer appears even once only in the same field of vision as the name of the geographical indication in Italian. In the specific case of Balsamic Vinegar of Modena, the producer is the processor, i.e. the entity that certified the batch as fit for packaging. The “name of the producer” is the firm name or any abbreviations thereof entered in the Business Register. Specifically, having regard to the legitimacy of the use of said abbreviations, in-depth assessments are underway with the competent authorities. The firm name shall be accompanied by a phrase identifying it as required, e.g. “Producer...”, “Produced by...”, “Produced and bottled by...” or other similar ones.

- 3.4.2. In any case, it is to be borne in mind that Regulation (EU) No 1169/2011 requires that the name, or firm name, and the address of the food business operator responsible for the information on the products given in the label be stated, while the Control Plan requires that the packaging plant’s address or CSQA code be stated (see point 3.3.1).

The producer, the packer and the food business operator may be not one and the same: the obligations are laid down by three different pieces of legislation and compliance with each one of them shall be verified. In the simplest case, i.e. the case of a vinegar loft that packages its product at the same plant and sells it in its own name, the information “Produced and bottled by... in...” fulfils all three the obligations set out in points 3.3 and 3.4.

3.5. MINISTERIAL DEFINITION

- 3.5.1. In addition, the presentation of the product shall include the phrase: *“Certified by a Control Body authorized by the Competent Ministry”* with the word ITALY 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 may be translated into the languages of the countries

where the product is to be sold, making sure that the translations are as faithful as possible to the original.

3.6. CONTAINER CAPACITY

- 3.6.1. The container capacity shall be mandatorily stated on package, in compliance with the options listed in Article 8 of the Production Specifications, namely: 0.100 l; 0.150 l; 0.200 l; 0.250 l; 0.375 l; 0.500 l; 0.750 l; 1 l; 1.5 l; 2 l; 3 l or 5 l. Bottles with capacities of over 5 l are allowed for professional use, and bottles with capacity of less than 25 ml are allowed for single serving containers.

4. REGULATED ELEMENTS

4.1. INVECCHIATO AND RISERVA (AGED AND RESERVE)

- 4.1.1. The term **Invecchiato**, which may be translated, may be combined with the name of the geographical indication on the label of a product that was aged for at least three years and that obtained the consequent certification.
- 4.1.2. The word **Invecchiato** may be accompanied by the indication of the minimum ageing period of three years, which may also be translated in the language of the country where the product is to be sold.

Some examples that are compliant:

- *Aceto Balsamico di Modena IGP Invecchiato – Aceto Balsamico di Modena PGI Aged;*
- *Aceto Balsamico di Modena IGP Invecchiato 3 anni - Balsamic Vinegar of Modena Aged for 3 years;*
- *Aceto Balsamico di Modena IGP Invecchiato almeno 3 anni - Aceto Balsamico di Modena PGI Aged for at least 3 years;*
- *Aceto Balsamico di Modena IGP Invecchiato oltre 3 anni - Balsamic Vinegar of Modena Aged for over 3 years.*

- 4.1.3. Likewise, the term **Riserva**, which may be translated, may be combined with the name of the geographical indication on the label of a product that was aged for at least five years and that obtained the consequent certification.
- 4.1.4. The word **Riserva** may be accompanied by the indication of the minimum ageing period of five years, which may also be translated in the language of the country where the product is to be sold.
- 4.1.5. In the labelling, the word **Riserva** may be used together with the name of the geographical indication, irrespective of whether combined with the term “Invecchiato” or not.

Some examples that are compliant:

- *Aceto Balsamico di Modena IGP Riserva - Aceto Balsamico di Modena PGI Reserve;*
- *Aceto Balsamico di Modena IGP Invecchiato Riserva - Balsamic Vinegar of Modena Aged Reserve;*



- *Aceto Balsamico di Modena IGP Riserva 5 anni - Aceto Balsamico di Modena PGI Reserve 5-year;*
- *Aceto Balsamico di Modena IGP Riserva Invecchiato 5 anni - Balsamic Vinegar of Modena Reserve Aged for 5 years;*
- *Aceto Balsamico di Modena IGP Riserva Invecchiato oltre 5 anni - Aceto Balsamico di Modena PGI Reserve Aged for over 5 years.*

4.1.6. In any case, the terms “invecchiato”, “invecchiamento” and translations thereof shall be authorised for use in the label only if referring to the product certified as Invecchiato or Riserva.

4.2. ADJECTIVES AND NUMBERS

- 4.2.1. No adjectives may be used, not even in a numerical form.
- 4.2.2. «Extra», «fine», «scelto», «selezionato», «riserva» (except for the products referred to in point 4.1), «superiore», «classico» or the like are expressly prohibited.
- 4.2.3. The word “tradizionale” (“traditional”) and any derived word, in Italian or translated, are always watched out for as they might be suggestive of the PDO product. 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 PGI product shall not be accepted nor authorised. 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...);
- 4.2.4. 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 stated. The list of countries in which labels have been approved departing from this rule currently includes:
- South Korea;
 - Israel;
 - Malaysia and Thailand;
 - Serbia
- 4.2.5. 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.

4.3. ANALYTICAL AND SENSORY PARAMETERS

- 4.3.1. The product’s analytical and sensory parameters, as provided by descriptors under Art. 2 of the “Consumption Characteristics” specifications, may be described, on the following conditions:



- They cannot be more visible than the name of the geographical indication (the maximum height must not exceed 75% of the smallest letter of the name);
 - Separation from the name of the geographical indication shall be ensured through appropriate spacing or graphic distinction or both.
- 4.3.2. 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;
- 4.3.3. The adjectives mentioned in the previous point 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.
- 4.3.4. Specifically, the “high density” description, which is one of the above options, may be used only for products having, at 20°C, density that is equal to or higher than 1.25.

4.4. PRODUCT SEGMENTATION

- 4.4.1. 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.

Corporate and shared segmentation systems may co-exist.

- 4.4.2. Reference may be made to precious metals or stones: such references (e.g.: gold, diamond, etc.) shall be expressly associated with some other element (label, range, seal ...) to make sure they do not act as substantial qualifications of the name of the geographical indication.
- 4.4.3. The same applies to any reference to colours or colour palettes; special care shall 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.

Some assessment examples:

– <i>Balsamic Vinegar of Modena Red Seal</i>	YES
– <i>Balsamic Vinegar of Modena Green</i>	NO
– <i>Balsamic Vinegar of Modena Gold Label</i>	YES
– <i>Balsamic Vinegar of Modena Gold</i>	NO

4.5. CLAIMS

- 4.5.1. Claims may be made, on condition they bring attention to some **uncommon** feature and are **demonstrable**. Common features are those provided for by the Specifications and by the applicable legislation and regulations (e.g. “matured in wood”, “preservative-free”).



- 4.5.2. In accordance with Article 8 of the 2025 Specifications, claims such as “caramel-free” and the like are prohibited; as a consequence, associated claims (e.g. “Free from colouring agents”) are also prohibited.
- 4.5.3. Any mention of a specific geographical area (e.g. *only grapes from Modena*) or of a specific vine variety (such as *from Lambrusco grapes*) shall apply to all ingredients (the must and the vinegar); otherwise, it shall be clearly specified to which ones.
- 4.5.4. The words **Guarantee/Method** are not acceptable unless they are commercial guarantees (e.g. “money-back guarantee”) and unrelated to the name of the protected geographical indication;
- 4.5.5. Claims or advertising texts that describe the manufacturing method in incomplete or ambiguous or incorrect ways (such as: “this BVM is made from cooked grape must, aged in wooden barrels ...”, without mentioning the vinegar) may have to be changed or supplemented.

4.6. INVENTED NAMES

- 4.6.1. Invented names added to the name of the geographical indication and to any other statutory information are acceptable, on condition that they do not generate confusion on the product’s features or nature, and do not contain the individual elements of the registered name of the geographical indication, in a partial or modified version.

4.7. SPECIAL BOTTLES/PACKAGES

- 4.7.1. “Special”, “limited” or similar editions for products that are on the market temporarily (e.g. for Christmas or special anniversaries) or for specific clients (restaurants, chefs...) are acceptable;
- 4.7.2. The overall graphic layout shall suggest that the distinctive features **do not concern the product**. In addition, a sense of proportions with the other phrases on the bottle shall be kept;
- 4.7.3. With the same methods, **co-branding** is also accepted: in this case, it is important that the name/brand of the producer or packer be present, in addition to the name/brand of their partnership.

4.8. 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 Article 8 of the Specifications or by the above paragraphs of these Guidelines, if the following conditions are met:

- 4.8.1. “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”);
- 4.8.2. If no close connection between the brand and the Distributor is clearly apparent on the label, the name of the geographical indication shall 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);



4.8.3. 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.

4.9. NUTRI-SCORE

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

4.10. USE OF THE WORDS OF THE NAME OF THE GEOGRAPHICAL INDICATION OUTSIDE OF IT

4.10.1. 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.

4.10.2. The word “Balsamico” (“Balsamic”) may not be used outside of the name of the geographical indication.

4.10.3. In descriptive texts, if the full name of the geographical indication (Italian or translated) is already shown in the same field of vision, a partial version of the name of the geographical indication may be used and, if needed, translated: “Balsamico di Modena” (“Balsamic of Modena”).

5. APPROVAL PROCEDURE

The procedure currently in force requires that labels be sent to the Consortium via e-mail to address: autorizzazioni@consorziobalsamico.it in the following formats: .pdf, .doc, .docx or image.

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.

As regards translations, the bottler/packer shall be responsible for ensuring that the texts provided upon approval are consistent with the actual text printed on the label. Specifically, the bottler/packer shall be responsible for texts in non-European languages and non-Latin alphabets.

6. VALIDITY

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

6.1. BACKLOG MANAGEMENT

Authorisations previously issued for labels that do not comply with the requirements laid down herein shall automatically lapse and, therefore, the labels shall be assessed and approved again, save for the exceptions listed below.

- 6.1.1. For the cases referred to in paragraphs 4.4.2 and 4.4.3 (segmentation), 4.5.1 (claims), 4.10.3 (abbreviation of the name of the geographical indication), the period to dispose of all the stock inventories and to make the labels compliant set as of the first version of these guidelines shall end in **May 2026**;
- 6.1.2. Having regard to the provisions laid down in the 2025 Specifications, introduced in points 3.1.4 (“Modena” sizes) and 4.5.2 (caramel claim), in accordance with the ministerial instructions, the labels that are not yet compliant may be used until **4 August 2026**.
- 6.1.3. Special or unexpected circumstances shall be assessed on a case-by-case basis.

6.2. CLOSING NOTES

The above criteria shall 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 Consortium’s website www.consorziobalsamico.it and on the forthcoming platform.

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