

GS1 Standards

# GDSN-Recommendations

for use in the display of quantity, volume and weight data in the German FMCG target market profile, V. 2.0





The Global Language of Business

**GS1 Standards**

# GDSN-Recommendations for use in the display of quantity, volume and weight data

in the German FMCG target market profile

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## Contributors

<p>This document was created in collaboration with the members of the Legal Expert Panel and with the support of Dr. Grube (GPKH Rechtsanwälte). It was released by the GDSN FMCG Expert Group.</p>
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## Log of changes

Version	Date of change	Changed by	Summary of change
1.0	September 2016	Tanja Thomsen	First published version
2.0	August 2023	Carolin Prinz Vivian Salim	<p>Basically updated due to changes in the PAngV (<i>Preisangabenverordnung</i> – German Price Indication Ordinance) and the FpackV (<i>Fertigpackungsverordnung</i> – German Pre-packaging Ordinance) on the basis of the ruling of Berlin Administrative Court of 23 February 2021 (4 K 86.19).</p> <ol style="list-style-type: none"> <li><a href="#">Section 3.6</a>: Breakdown of products sold by piece into products sold by piece with and without pre-packaging</li> <li>New section on self-filling of offered liquid bulk goods (<a href="#">Section 3.7</a>)</li> <li>General revision of the topic products sold by yield (<a href="#">Section 4</a>)</li> <li><a href="#">Section 5.2</a>: Drained weight: Added distinction between pre-packages and pre-packaged foods.</li> <li><a href="#">Section 5.3</a>: Handling of glazed foods: Added distinction between pre-packages and pre-packaged foods.</li> <li><a href="#">Section 6.4</a>: New table to illustrate the interaction between the FIC and the FPackV.</li> </ol>

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## 1 Objective

Quantity, volume and weight data was originally used to support logistical processes along the value-added chain. In recent years, however, the legislators have moved consumer protection to the fore (see Regulation (EU) No. 1169/2011, Food Information to Consumers Regulation (FIC)) and defined several specifications on quantity information (e.g. nominal content). These specifications regarding the declaration of nominal contents in turn impact the obligation in the retail trade to include price comparison information.

The definition of standardized specifications is essential to prevent drawing incorrect conclusions from the dataset (which could lead to the indication of an incorrect base price, for example). Uniform rules governing how to fill in the corresponding quantity, weight and volume data for different products with different declaration requirements or even for the same products with different declarations on the product (the legislators permit a certain degree of freedom here).

These recommendations for use provide an overview of the quantity, volume and weight data used in the GDSN (Global Data Synchronisation Network) FMCG profile of the target market Germany and present them in a structured and clear manner in the context described above. Furthermore, concrete implementation assistance is provided in the form of real-world examples of how to fill in the GDSN fields. Please see the [Trade Item Implementation Guide](#) for additional information.

**Note:** A product marketed in Germany must comply with applicable legal provisions. It therefore must be possible to display the relevant content in the target market of Germany.

Technical implementation of the attributes is based on the specifications from the atrify Compendium. Furthermore, all products marketed in Germany must comply with all legal provisions applicable to this product. These include:

- Regulation (EU) No. 1169/2011 (Food Information to Consumers Regulation)
- Regulation (EC) No. 1223/2009 (Cosmetic Products Regulation)
- Regulation (EC) No. 767/2009 (Feed Marketing Regulation)
- and others

Supplementing the European regulations indicated above are national regulations, which also must be observed. The following two laws are relevant here in the context of quantity, volume and weight data:

- FPackV (Pre-packaging Ordinance) of 18 November 2020 and valid from 1 December 2020
- PAngV of 12 November 2021 (German Price Indication Ordinance) and valid from 28 May 2022

**Note:** The regulations listed do not constitute an exhaustive list of relevant legal standards, but are merely intended to illustrate the legal framework within which a product falls when it is sold in Germany.

Statements made in this implementation guide refer to pre-packaged and loose products in accordance with the PAngV, which are described via the attributes "Trade item unit descriptor" = "BASE\_UNIT\_OR\_EACH" [M242] and/or "Is trade item a consumer unit" [M247] = "yes (= true)". Information on higher article hierarchies (e.g. case or pallet) are not considered.

## 2 Overview: How do I use the implementation guide?

These recommendations for use describe the general use of the quantity, volume and weight attributes in the GDSN, from a simple case (standard case) to more complex cases.

The following product categories are described in detail below:

[Section 3: Products with exactly one declared content.](#)

[Section 4: Products sold by yield](#)

[Section 5: Products with a multiple declaration of the content](#)

[Section 6: Special cases](#)

The following is an overview of all quantity, volume and weight data considered:

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Net weight [M278] [is optional and can always be indicated in addition]
- Gross weight [M279]
- Net content [M281]
- Net content statement [M282]
- Drained weight [M280]
- Is base price declaration relevant [M321]
- Price comparison measurement [M322]
- Product yield type code [M087]
- Product yield: Value [M085]

A short technical description of the attributes can be found in [Appendix 7.1 "Short technical description of the quantity, volume and weight data"](#). Please refer to the atrify Compendium for more detailed information.

All attributes not filled and described in the tables for the examples are not relevant for this use case and must not be filled.

**Note:** These recommendations for use do not consider the attributes for describing serving size. These are used in the context of nutritional information and are described in detail in the "GDSN implementation guidelines for technical use in the context of the FIC".

This guideline therefore does not cover the following attributes:

- Serving size: Value [M075]
- Serving size description [M074]
- Number of servings per package [M076]
- Number of servings range description [M077]

**Note:** All attributes for indicating the dimensions of an article (e.g. depth, width, height) all quantity data with reference to an article hierarchy (e.g. 36 cases on a pallet, six cans in a case) are likewise not considered.

## 3 Products with exactly one declared content.

### 3.1 Labelling of the content in accordance with the Food Information to Consumers Regulation (FIC) and the Pre-packaging Ordinance (FPackV)

The FIC specifies in Article 23 that the net quantity must be indicated in units of volume or mass **on the packaging**. Annex IX defines, among other things, the following exception for products sold by piece:

*"The net quantity declaration shall not be mandatory in the case of foods:...*

*c) normally sold by number of pieces, provided that the number of pieces can be clearly seen and easily counted from the outside, or, if not, is declared on the label." ...*

Furthermore, Article 42 refers to supplemental "national measures". For Germany, this is the Pre-packaging Ordinance (FPackV), which among other things governs the indication of a yield.

If pre-packages are marketed commercially in Germany, the FPackV mandates that the content be labelled. This can be indicated by weight, volume or number of pieces. Special considerations apply for the labelling of certain products, however. This document discusses several examples in greater detail.

### 3.2 Obligation to indicate a base price in accordance with the German Price Indication Ordinance (PAngV)

To facilitate the comparison of prices for consumers, the German Price Indication Ordinance (PAngV) stipulates in Section 4 (1) and (2), that

*"(1) Any entrepreneur who offers customers goods in pre-packages, open packages or as units of sale without wrapping by weight, volume, length or area, or as a seller of these goods advertises to consumers stating prices, shall indicate not just the total price but also the base price in an unambiguous, clearly recognisable and easily legible manner. There is no need to indicate the base price if this is identical with the total price.*

*(2) Any person who, as an entrepreneur, offers loose goods to consumers by weight, volume, length or area, or who, as a supplier of these goods, advertises to consumers stating prices, shall indicate only the base price."*

Accordingly, a base price shall be indicated for products with a declared content (except piece) in pre-packages, open packages or as units of sale without wrapping or for loose goods. Furthermore, there is no need to indicate the base price with pre-packages if this is identical with the total price.

The base price does not necessarily have to be indicated on the packaging of the article. It does, however, must then be unambiguous, clearly recognisable and easily legible elsewhere. Goods that can be taken directly by consumers or are offered visibly inside or outside of the salesroom in display windows, showcases, on shelves, sales stands or in any other manner, shall be marked with price tags or by labelling the goods (Section 10 (1) PAngV). Goods that are stored visibly or invisibly in closed cupboards, showcases, drawers or on shelves behind the sales counter and which are not directly accessible to the customer shall be marked with price tags, by labelling the goods, by attachment or display of price lists or by labelling the containers or shelves in which the goods are located (in accordance with Section 10 (2) PAngV).

PAngV also defines a series of exceptions for pre-packages, open packages or units of sale without wrapping (Section 4 (1) in Section 4 (3) PAngV for such things as:

1. goods with a net weight or net volume of less than 10 grams or 10 millilitres;
2. goods containing different types of products that are not mixed or blended together;
3. goods offered by small direct marketers, in particularly farm shops, wineries or beekeepers, as well as by small trade businesses, in particular kiosks, mobile sales points or stands at markets or public festivals, in which the goods are primarily handed over by staff, unless the range of goods is procured within the context of a distribution system;

4. goods offered within the context of a service;
5. goods offered in vending machines for food and beverages;
6. chewing tobacco and snuff with a net weight of up to 25 grams;
7. cosmetic products used exclusively for colouring or beautifying the skin, hair or nails;
8. perfumes and perfumed toilet waters with at least 3 per cent by volume perfume oil and at least 70 per cent by volume pure ethyl alcohol.

GDSN includes the following attributes for depicting the information required for determining the base price:

- Net content [M281]
- Drained weight [M280]
- Is base price declaration relevant [M321]
- Price comparison measurement [M322]

### 3.3 Solid products

Solid products are sold by weight. The weight is usually shown in grams and is indicated on the packaging. For the example shown here, the following attributes are specified in GDSN:

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	500 (GRM)
Gross weight [M279]		516 (GRM)
Net content [M281]		500 (GRM)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]	The obligation to provide price comparison information generally refers to the net content. Except when a drained weight or a different quantity is specified in the attribute "Price comparison measurement [M322]" .	Yes (= TRUE)
Price comparison measurement [M322]		---

Attribute name	Remark	Example
Product yield type code [M087]		---
Product yield: Value [M085]		---

**Note:** With products that indicate the net content in units of mass<sup>1</sup>, the net weight, if indicated, is identical to the net content.

### 3.4 Liquid products

Liquid products are sold by volume. The volume is indicated in millilitres, centilitres or litres and is indicated on the packaging. For the example shown here, the same attributes are specified as for products sold by weight in the GDSN:

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]

In this example, only one declaration in volume is made on the product. The GDSN attributes are to be used as follows:



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	690 (GRM)
Gross weight [M279]		1007 (GRM)
Net content [M281]		750 (MLT)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

### 3.5 Multi-packs

Multi-packs are made up of multiple pre-packages (combi-packs). Multi-packs can be made up of solid or liquid products.

<sup>1</sup> Mass units are e.g. milligram (mg), gram (g), kilogram (kg) and tonne (t).

In the case of multi-packs, the provisions of the FPackV and FIC must be observed; the following applies for multi-packs in accordance with Section 39 (1–3) FPackV:

*"(1) Any person who manufactures [...] places on the market or otherwise makes available on the market a pre-package comprising multiple packages of the same product not intended for individual sale must mark this with the total nominal content and the number of individual packages. The number of packages does not have to be indicated if all packages are visible and easily counted.*

*(2) Where a pre-package consists of multiple packages of different products not intended for individual sale, or where different products are filled separately into a pre-package, the quantities of the individual products shall be indicated.*

*(3) In the case of packages consisting of several pre-packages (multi-packs), in addition to the indication of the nominal content on the individual pre-packages, the number and the nominal content of the individual pre-packages shall be indicated on the wrapper of the multi-pack. These additional indications shall not be required if the individual pre-packages are visible and easily counted and the indication of the content can be recognised on all of the pre-packages, or in the case of pre-packages with the same nominal content, on one pre-package."*

For this example, the attributes are to be specified in the GDSN as follows:

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Net content statement [M282]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	265 (GRM)
Gross weight [M279]		284 (GRM)
Net content [M281]	The net content may have to be calculated.	265 (GRM)
Net content statement [M282]		10 x 26.5 g
Drained weight [M280]		---
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

For the provisions of the FIC relevant to multi-packs, please see [Section 6.4 "Multi-packs in accordance with FPackV and FIC"](#).

### 3.6 Products sold by piece

For these products, the following attributes are to be specified in the GDSN:

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]



Indication of the base price is not required for these articles, as there is no obligation to provide price comparison information for goods that are typically sold in certain quantity units, such as piece, pair, etc.

Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	700 (GRM)
Gross weight [M279]		710 (GRM)
Net content [M281]		56 (1N = Count*)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		No (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

**Note:** \*) There are three codes available in the GDSN for piece indication: H87 = Stück/piece, 1N = Anzahl/count, EA= Eines/each.

Section 21 "Labelling by number of pieces" and Section 25 "Special provisions in the case of labelling by number of pieces" of the Pre-packaging Ordinance define the items that may be placed on the market per "piece".

#### 3.6.1 Pre-packed food and pre-packages with food

This section applies to **pre-packaged food** and **pre-packages with food** sold to final consumers or group caterers. As described in Section 21 (1) FPackV, the number of pieces may be indicated on pre-packages with fruit and vegetables, baking wafers and spices if the products are generally only traded by number of pieces.

Furthermore, as described in Section 21 (2) FPackV, the number of pieces may be indicated for the following foods, provided they are sold in pre-packages containing more than one piece and the content is less than 100 grams. This applies:

- for figurative sugar confectionery, figurative chocolate products, except pralines, and dry baked goods with an individual weight of more than 5 grams,

- for chewing gum, chewy sweets and aerated confectionery.

In the case of pre-packages with artificial sweetener tablets, only the number of pieces must be indicated (Section 21 (3) FPackV).

### 3.6.2 For all other products in pre-packages

This section applies to **all other products in pre-packages** that are not pre-packaged foods or pre-packages with foods. (Art. 25 FPackV and Art. 19 EU Cosmetics Regulation<sup>2</sup>)

Furthermore, according to Art. 25 FPackV, the following products may be labelled by number:

- perfumed cleansers and dishwashing detergents in piece form weighing less than 50 grams each,
- for automotive care products in portion packs,
- for feeds for pets and wild birds, if the general public perception is that the feeds are traded only by the number of pieces,
- for glue sticks,
- for touch-up pens with a content of less than 50 millilitres.

In addition, Article 19 (1) (b) of Chapter VI of the Cosmetics Regulation (EC) No 1223/2009 provides that

- the nominal content at the time of packaging, given by weight or by volume, except in the case of packaging containing less than 5 grams or 5 millilitres, free samples and single-application packs; for pre-packages normally sold as a number of items, for which details of weight or volume are not significant, the content need not be given provided the number of items appears on the packaging. This information need not be given if the number of items is easy to see from the outside or if the product is normally only sold individually.

### 3.7 Self-filling of offered liquid bulk goods

According to Section 5 (3) PAngV, in the case of liquid bulk goods offered for self-filling, the base price by weight may be indicated in addition to the base price according to Section 5 (2), in deviation from the general perception of the trade.

These products are not exchanged in the GDSN as a consumer unit (isTradeItemAConsumerUnit="true"). Consumer units are pre-packaged foods intended to be sold to the consumer.

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<sup>2</sup> Art. 19 of the EU Cosmetics Regulation concerns both pre-packaged and non-pre-packaged cosmetic products.

## 4 Products sold by yield

For defined foods, the content is replaced by the “yield” (optionally, the nominal content can also be given). The yield is based on the ready-to-eat portion or the quantities required for preparation.

The FPackV defines products sold by yield in Section 20 (2) with the respective yield quantity to be indicated:

3. Pre-packages containing concentrated soups, broths, gravies, seasoning sauces and salad dressings **with the volume of the ready-to-eat preparation** in litres or millilitres [see [Sections 4.2 and 4.3](#)].

4. Pre-packages containing baking powder and baker’s yeast with the weight of flour for the processing of which the content is still sufficient after the storage time that is to be expected in circulation [see [Section 4.4](#)].

5. Pre-packages containing pudding powders and related products and dry products for purees, dumplings and similar accompaniments **with the amount of liquid required to prepare the content** [see [Chapter 4.3](#)].

### 4.1 Products sold by yield with a voluntary declaration of the weight

If products that are to be labelled with the yield according to Section 20 (2) 3-5 FPackV are also voluntarily labelled with the nominal content of the unprepared dry product, these must be labelled with the base price in accordance with to Section 4 (1) PAngV. In these cases, the base price refers to the voluntary declaration of the nominal content (weight of the unprepared dry product) and not to the yield quantity.

**Note:** This applies both to products to which drinking water is added and to products to which other ingredients such as milk, oat drinks, sugar or flour are added.

Conditionally mandatory [If “Is trade item a base unit [M243]” = “true” and “Is trade item a consumer unit M247” = “true” and “GPC Brick [M317]”]:

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Net content: Description [M282]
- Is base price declaration relevant [M321]
- Price comparison measurement [M322]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If “Is trade item a base unit [M243]” = “TRUE” and “Is trade item a consumer unit M247” = “TRUE” and “GPC Brick [M317]”)	38 (GRM)
Gross weight [M279]		54.4 (GRM)
Net content [M281]		1 (LTR)

Attribute name	Remark	Example
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]	As the grammage is also indicated on the product, the product is subject to the obligation to provide price comparison information.	Yes (= TRUE)
Price comparison measurement [M322]	If the base price is to be indicated in a quantity and unit of measurement deviating from the declared net content, the price comparison measurement must be stored.	38 (GRM)
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 4.2 Products sold by yield prepared with drinking water (e.g. soups)

According to Section 2 No. 4 PAngV, "base price" within the meaning of the ordinance means "the price per quantity unit of a good including VAT and other price components". In the case of products sold by yield prepared with drinking water, the costs for the drinking water as an "other price component" are negligible and thus play no role in the calculation of the base price.

It is legally justifiable not to indicate a base price for these products, as they are not marketed by weight/volume. However, in the interest of uniformity and better comparability of the products, GS1 recommends indicating the base price for products that are to be labelled with the yield in accordance with Section 20 (2) FPackV and are prepared **with drinking water**. In these cases, the base price refers to the labelled yield in accordance with Section 20 (2) FPackV.

In case of a voluntary declaration of the nominal content of the unprepared dry product, the statements in Section 4.1 of this guideline apply.

The attributes are to be specified in the GDSN as follows:

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]
- Product yield type code [M087]
- Product yield: Value [M085]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]"")	51 (GRM)
Gross weight [M279]		54 (GRM)
Net content [M281]	In this case, the yield must be specified.	1 (LTR)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]	If Product yield: Value [M085] is specified, then a declaration is required here as well.	AFTER_COOKING
Product yield: Value [M085]	This indication is optional.	1 (LTR)

### 4.3 Products sold by yield with the addition of other ingredients (e.g. pudding)

The ruling of the Berlin Administrative Court of 23 February 2021 (4 K 86.19) can be understood to mean that products prepared with the addition of other ingredients such as milk and labelled with the yield in accordance with Section 20 (2) 3 and 5 FPackV must also be labelled with the base price based on yield. According to Section 2 No. 4 PAngV, "base price" within the meaning of the ordinance means "the price per quantity unit of a good including VAT and other price components".

For important reasons, this guide does **not** follow a reading of the decision according to which products sold by yield to which other ingredients such as milk, oat drinks or sugar have to be added by the consumer should be subject to a base price based on yield:

The ruling of the Berlin Administrative Court is based on an individual case decision and does consider the prices of the other ingredients required for the preparation of the products sold by yield. For example, different milk products (cow's milk, oat milk, coconut milk, but also different branded products) can be used for the preparation of the products, which are offered at different prices. However, the prices of the other ingredients to be used would have to be included in the calculation in order to calculate the base price correctly. This is not easily possible due to the different prices in the market. Without the corresponding pricing of the other ingredients, however, it is not possible to determine the base price in the sense of the definition or to compare base prices.

The guideline therefore follows the view that **no base price** is to be indicated if the products sold by yield are prepared with other ingredients such as milk, cream or sugar and are to be labelled with the yield in accordance with Section 20 (2) 3 and 5 FPackV.

In case of a voluntary declaration of the nominal content of the unprepared dry product, the statements in [Section 4.1](#) of this guideline apply.

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Net content statement [M282]
- Is base price declaration relevant [M321]
- Price comparison measurement [M322]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]")	80 (GRM)
Gross weight [M279]		85 (GRM)
Net content [M281]		500 (MLT)
Net content statement [M282]		for 500 ml liquid
Drained weight [M280]		---
Is base price declaration relevant [M321]		NO (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

#### 4.4 Baking powder and baker's yeast

The Berlin Administrative Court did not make a decision with regard to the base price indication for baking powder and baker's yeast, which according to Section 20 (2) 4 FPackV must be labelled with the weight of the flour for the processing of which the content is still sufficient after the storage time that is to be expected in circulation.

As in the case of products sold by yield prepared with the addition of other ingredients ([Section 4.3](#)), it is also the case here that no base price has to be indicated, as the flour prices likewise cannot be considered in the calculation of the base price.

In case of a voluntary declaration of the nominal content of the unprepared dry product, the statements in [Section 4.1](#) of this guideline apply.

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Net content statement [M282]
- Is base price declaration relevant [M321]
- Price comparison measurement [M322]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]")	42 (GRM)
Gross weight [M279]		43 (GRM)
Net content [M281]	The current specification of the attribute does not allow from-to statements. Therefore, only the lower limit "500 g" is indicated.	500 (GRM)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		NO (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

#### 4.5 Yield: Pre-package consisting of several packages of different products not intended for retail sale

Pre-packages containing spaghetti, a separate sauce and a separate seasoning mix, for example, must be labelled with the individual contents.

*With regard to the content, Section 39 (2) FPackV states:*

*"Where a pre-package consists of multiple packages of different products not intended for individual sale, or where different products are filled separately into a pre-package, the quantities of the individual products shall be indicated".*

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Net content statement [M282]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	359.8 (GRM)
Gross weight [M279]		391.544 (GRM)
Net content [M281]		359.8 (GRM)
Net content statement [M282]		Macaroni 232 g Tomato paste 110.4 g Seasoning mix 17.4 g
Drained weight [M280]		---
Is base price declaration relevant [M321]	Excluded in accordance with Section 4 (3) 2 PAngVO.	NO (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

#### 4.6 Yield: Pre-package with two declarations

According to Section 6 (2) FPackV

*"(2) Pre-packages containing detergents and cleansers as well as cleaning and care products*

- 1. in liquid or pasty form shall labelled by volume and*
- 2. in solid or powdered form shall be labelled by weight*

*Soft soaps shall be labelled by weight."*

*Article 19 (1) (b) of Chapter VI of the Cosmetics Regulation (EC) No 1223/2009 provides that*

*"(...) the nominal content at the time of packaging, given by weight or by volume, except in the case of packaging containing less than 5 grams or 5 millilitres, free samples and single-application packs; for pre-packages normally sold as a number of items, for which details of*

*weight or volume are not significant, the content need not be given provided the number of items appears on the packaging. This information need not be given if the number of items is easy to see from the outside or if the product is normally only sold individually;*

When selling material goods to the end consumer, there is always the additional obligation to indicate the base price in accordance with the Price Indication Ordinance. The quantity unit to be indicated is 1 kilogram, 1 litre, 1 cubic metre, 1 metre or 1 square metre, respectively.

The legislators have provided an exception for household laundry detergents. According to Section 5 (5) PAngV, a customary application may also be used as the unit of measure for the base price in the case of household detergents. The same applies to individually portioned detergents or cleansers if the number of portions is indicated in addition to the total content.

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]
- Price comparison measurement [M322]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	7 (KGM)
Gross weight [M279]		7.43 (KGM)
Net content [M281]		7 (KGM)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		YES (= TRUE)
Price comparison measurement [M322]		100 (PTN)
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 5 Products with a multiple declaration of the content

There are various reasons for a multiple declaration of the content. On the one hand, the reason can lie in the product itself (pasty soups can be indicated in millilitres as well as in grams), a multiple declaration is defined by the legislators (e.g. additional declaration of the drained weight by the FIC) or different national legislation (ice cream is sometimes to be indicated by volume and sometimes by weight).

**Note:** In the case of a multiple declaration of the content, only the legally mandated content is to be transferred in the GDSN.

### 5.1 Net content in volume and mass units

For the German target market, the following special regulations apply in accordance with national legislation on the indication of the net content for ice cream:



- the content for pre-packages with ice cream must be indicated by volume in accordance with Section 20 (2) 2 (b) FPackV
- for ice cream with a content of 200 ml or less, no indication of content is required in accordance with Section 22 (2) 5 FPackV.

However, according to Article 23 (1) FIC, the applicable unit of measurement depends on whether the food is a "liquid" or "other" food. It therefore depends on the aggregate state of the food. Accordingly, manufacturers could take the view that the content information for ice cream could be indicated by weight. As a result, there may be different requirements or labelling of content information for ice cream in Germany and other member states of the European Union.



With regard to the base price, Section 5 (1) PAngV states that for products offered by volume, the quantity unit for the base price is always 1 litre.

**Note:** Since no content information is required for ice cream with a content of 200 ml or less, the price information should then refer to the number of pieces.

With regard to the fact that the content of pre-packages with ice cream is to be indicated in volume according to national legislation and that the net content is declared on the packaging despite the

exemption according to Section 22 (2) 5 FPackV, the following attributes apply for the example illustrated here, which are to be declared in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net Content [M281]
- Is base price declaration relevant [M321]

Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	90 (GRM)
Gross weight [M279]		99.3 (GRM)
Net content [M281]		150 (MLT)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		YES (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

**Notice:** Special rules apply to ice cream in larger packaging units with individually packaged ice cream. These are discussed separately [in Section 6.4.2 Combi-pack as a consumer unit](#).

## 5.2 Products with a drained weight

The amended Pre-packaging Ordinance differentiates between pre-packaged food (these are also pre-packages) and, in general, pre-packages containing products other than food as well as pre-packages containing food.

The regulations thus state that pre-packages with food (Section 5 FPackV) as well as pre-packaged food (Annex IX No. 5 LMIV) must indicate the drained weight of the food in addition to the nominal content if there is a solid food in a liquid medium.

**Notice:** According to Section 5 FPackV, liquid media are defined as:

*"(2). Liquid medium shall mean the following products, provided the liquid is merely an adjunct to the essential elements of the preparation and is thus not a decisive factor for the purchase:*

1. water,
2. aqueous solutions of salts,
3. brine,
4. aqueous solutions of food acids,

5. vinegar,
6. aqueous solutions of sugars,
7. aqueous solutions of other sweetening substances, and
8. fruit or vegetable juices in the case of fruit and vegetables.

This also applies if the liquid medium

1. in mixtures
2. is frozen or
3. is quick-frozen."

Conversely, this means that for a product packed in oil, the weight of the oil is part of the total content of the product. The oil is therefore not a liquid medium.

This means that a drained weight must be indicated for tuna in water, and a total nominal content for tuna in oil.

If the drained weight of goods is to be indicated, the base price shall be based on the declared drained weight (Section 5 (4) PAngV).

**Example:** Apricots in liquid medium

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Drained weight [M280]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]")	825 (GRM)
Gross weight [M279]		881.05 (GRM)
Net content [M281]		825 (GRM)
Net content statement [M282]		---
Drained weight [M280]	In the case of products in liquid media, the base price refers to the drained weight.	490 (GRM)
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

**Example:** Tuna in liquid medium

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Drained weight [M280]
- Is base price declaration relevant [M321]
- Price comparison measurement [M322]

Thunfischfilets, geschnitten, in eigenem Saft und Aufguss Thunfisch ( <i>Katsuwonus pelamis</i> ), gefangen im Pazifischen Ozean (Westlicher Pazifischer Ozean) mit Umschließungsnetzen und Hebenetzen (Ringwaden). mindestens haltbar bis: 31.12.2018		ZUTATEN: Thunfisch, Wasser, Speisesalz.		DURCHSCHNITTLICHE NÄHRWERTE**		pro 100g		% RM* pro 100g	
Füllmenge: <b>195g e</b>		Abtropfgewicht: <b>150g</b>		Brennwert kJ/kcal		547/129		7%	
Papua-Neuguinea 08EPR001 EDEKA ZENTRALE AG & Co. KG, D-22291 Hamburg, 05		*Referenzmenge für einen durchschnittlichen Erwachsenen (8400 kJ/2000 kcal)		Fett		1,0 g		1%	
EDEKA KUNDEN- UND ERNÄHRUNGSSERVICE: 0800 333 5211 (kostenfrei aus dem dt. Fest- und Mobilfunknetz) oder info@edeka.de.		**bezogen auf das abgetropfte Produkt		davon: - gesättigte Fettsäuren		0,4 g		2%	
				Kohlenhydrate		0,6 g		<1%	
				davon: - Zucker		0,1 g		<1%	
				Eiweiß		29,1 g		58%	
				Salz		0,8 g		13%	

Attribute name	Remark	Example tuna in liquid
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	195 (GRM)
Gross weight [M279]		234 (GRM)
Net content [M281]		195 (GRM)
Net content statement [M282]		---
Drained weight [M280]	In the case of products in liquid media, the base price refers to the drained weight.	150 (GRM)
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

**Example:** Tuna in oil

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]

Thunfischfilets, geschnitten, in Sonnenblumenöl Thunfisch ( <i>Katsuwonus pelamis</i> ), gefangen im Pazifischen Ozean (Westlicher Pazifischer Ozean) mit Umschließungsnetzen und Hebenetzen (Ringwaden), mindestens haltbar bis: 30.06.2020 Füllmenge: <b>195g e</b> Papua-Neuguinea 08EPR001 EDEKA ZENTRALE AG & Co. KG, D-22291 Hamburg, Q5 EDEKA KUNDEN- UND ERNÄHRUNGSSERVICE: 0800 333 5211 (kostenfrei aus dem dt. Fest- und Mobilfunknetz) oder info@edeka.de.		<b>ZUTATEN:</b> 79% Thunfisch, 20% Sonnenblumenöl, Speisesalz.	<b>DURCHSCHNITTLICHE NÄHRWERTE**</b>	pro 100g	%RM* pro 100g
			Brennwert k./kcal	664/158	8%
			Fett	4,5 g	6%
			davon: - gesättigte Fettsäuren	0,8 g	4%
			Kohlenhydrate	0,3 g	<1%
			davon: - Zucker	0,1 g	<1%
			Eiweiß	28,8 g	58%
			Salz	0,8 g	13%

Attribute name	Remark	Example Tuna in oil
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	195 (GRM)
Gross weight [M279]		234 (GRM)
Net content [M281]		195 (GRM)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]	No indication required, as the price comparison measurement corresponds to the net content.	---
Product yield type code [M087]		---
Product yield: Value [M085]		---

### 5.3 Handling of glazed food

The amended Pre-packaging Ordinance differentiates between pre-packaged food (these are also pre-packages) and, in general, pre-packages containing products other than food as well as pre-packages containing food.

For example, Section 10 (4) FPackV regulates the handling of glazed food in pre-packages.

According to Section 10 (4) FPackV, in the case of pre-packages with glazed food, the glaze may not be included in the declared nominal content of the food.

Pre-packaged food is regulated in the FIC as follows:

If water constitutes a liquid medium and liquid media may also be frozen or quick-frozen (cf. Annex IX No. 5 FIC), the FIC differentiates between "liquid media" and "glazes" with regard to glazed pre-packaged food. It states:

*"Where a solid food is presented in a liquid medium, the drained net weight of the food shall also be indicated. Where the food has been glazed, the declared net weight\* of the food shall be exclusive of the glaze."*

It follows that a declaration of the total content including the glaze is not recommended.

Supporting a differentiation between "liquid media" and "glazes" is the fact that glazed products may not simply be "drained" to determine the net weight, but rather the glaze must be removed under specific parameters without thawing the product as a whole.

Since glazed foods are as goods in pre-packages by weight that are offered to end consumers on a commercial basis, the base price must also be indicated in accordance with Section 5 (1) PAngV. This refers to the declared net weight\* and the additional indication of a price comparison measurement is not required.

This results in the following attributes to depict glazed foods in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]

**Note:** \*) In this case, the net weight mentioned in this section must be transferred to the GDSN attribute "Net content" [M281].

## 6 Special cases

### 6.1 Products "without" declaration of the net content on the packaging

**Example:** Feine Dekorblüten 0.2 g/piece each. Content: 12 flowers

According to Section 21 FPackV (labelling of the number of pieces in pre-packed foodstuffs):

*"(1) In deviation from Section 20 (1)(2), the responsible person within the meaning of Article 8 (1) of Regulation (EU) No 1169/2011 may indicate the number of pieces in the case of pre-packages with fruit and vegetables, bakery wafers and spices if, in accordance with the general perception of the trade, the products are only traded by number of pieces. (...)"*

In this example, the manufacturer has decided, based on its right of choice, to indicate the number of pieces on the packaging. The indication of 12 pieces on the packaging is considered to be information for the consumer.

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" = "TRUE")	2.4 (GRM)
Gross weight [M279]		9.98 (GRM)
Net content [M281]		12 (H87 = piece)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]	Indication of the base price is not required for goods that are typically sold in certain quantity units, such as piece, pair, etc.	No (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 6.2 Figurative sugar confectionery and chocolate products

According to Section 21 (2) 1 FPackV, the number of pieces may be indicated for the following foods, provided they are sold in pre-packages containing more than one piece and the content is less than 100 grams:

*Section 21 (2) 1.: "... for figurative sugar confectionery, figurative chocolate products, except pralines, and dry baked goods with an individual weight of more than 5 grams"*

For the example mentioned, this means that the attributes in the GDSN are to be specified as follows.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Net content statement [M282]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" )	56 (GRM)
Gross weight [M279]		63.03 (GRM)
Net content [M281]		18 (H87 = piece) [= roses]
Net content statement [M282]		6 roses incl. 12 leaves
Drained weight [M280]		---
Is base price declaration relevant [M321]		No (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 6.3 "Liquid" products to be labelled by weight

Liquid products are sold as "volume" (sold by volume). Labelling is in accordance with the Pre-packaging Ordinance:

*"Section 20 (1) Pre-packages containing liquid foods shall be labelled by volume, pre-packages containing other foods by weight.*

*(2) In deviation from Paragraph 1, the following shall be marked*

*1. by weight pre-packages with*

- a. honey, pectin, malt extract and syrup intended for use as a spread,
- b. milk products with the exception of mixed milk drinks,
- c. vinegar essence,
- d. spices,...

(3) In deviation from Paragraph 2 (1) (b), in the case of

- 1. unsweetened condensed milk products filled in containers other than metal cans or tubes, the weight and volume,
  - 2. buttermilk products, the weight or volume
- is to be indicated. ...”

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]

The declaration for this liquid food is to be indicated on the product in grams (here 250 g). The GDSN attributes are to be used as follows:



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If “Is trade item a base unit [M243]” = “TRUE” and “Is trade item a consumer unit M247” = “TRUE” and “GPC Brick [M317]”)	250 (GRM)
Gross weight [M279]		443.57 (GRM)
Net content [M281]		250 (GRM)
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 6.4 Multi-packs according to FPackV and FIR

Special regulations apply to the labelling of contents on multi-packs. Whether continuing regulations of the national pre-packaging ordinance or elements of the FIC are to be applied depends on whether the pre-packaged products are similar or different products and whether the individual products can be sold to the consumer.

The interaction is illustrated in the following table: Type of packaging	Regulation according to FIC	Regulation according to FPackV
<p>Multi-pack containing packaged products that are sold <b>individually</b> to the consumer, i.e. which each constitute a "unit of sale" – six-pack of water (shrink-wrapped). The bottles can usually also be purchased individually. These are pre-packages in a pre-package.</p>	<p>Annex IX No. 3 FIC:</p> <p>Where a prepacked item consists of two or more individual prepacked items containing the same quantity of the same product, the net quantity shall be indicated by mentioning <b>the net quantity contained in each individual package and the total number of such packages.</b></p> <p>The term "prepacked item consist(ing) of two or more individual prepacked items containing the same quantity of the same product" is narrower than the term "multi-pack" according to FPackV because it requires individual packages containing the same quantity.</p> <p>An unwritten criterion is that the individual prepacked items are to be regarded as units of sale. In view of and in delimitation to the case group according to Annex IX No. 4 FIC. In the meaning of this regulation, the purposes of this regulation, the "individual prepacked item" is therefore a "prepacked item".</p> <p>The indication of those particulars shall not, however, be mandatory where the total number of individual packages can be clearly seen and easily counted from the outside and where at least one indication of the net quantity contained in each individual package can be clearly seen from the outside.</p>	<p><b>Section 39 (3) FPackV</b></p> <p>In the case of packages consisting of several pre-packages (multi-packs), <b>in addition to the indication of the nominal content on the individual pre-packages, the number and nominal content of the individual pre-packages shall be indicated on the wrapper of the multi-pack.</b></p> <p>These additional indications shall not be required if the individual pre-packages are visible and easily counted and the indication of the content can be recognised on all of the pre-packages, or in the case of pre-packages with the same nominal content, on one pre-package.</p>

The interaction is illustrated in the following table: Type of packaging	Regulation according to FIC	Regulation according to FPackV
Multiple package containing <b>similar</b> packaged products that are <b>not sold individually</b> to the consumer, i.e. do not constitute a "unit of sale" – packaging with individual small "pots" of condensed milk. Individual sale is not foreseen and would be unusual.	<b>Annex IX No. 4 FIC:</b> Where a prepacked item consists of two or more individual packages which are not regarded as units of sale, the net quantity shall be given by indicating <b>the total net quantity and the total number of individual packages.</b>	Section 39 (1) FPackV Any person who manufactures, brings into the scope of the Measurement and Calibration Act, places on the market or otherwise makes available on the market a pre-package comprising multiple packages of the same product not intended for individual sale must mark this with the <b>total nominal content and the number of individual packages.</b> The number of packages does not have to be indicated if all packages are visible and easily counted.
Pre-packages containing <b>different types of</b> packaged products that are <b>are not sold individually</b> to the consumer, i.e. do not constitute a "unit of sale" – Example: noodles with tomato sauce packaged separately	Annex IX No. 4 FIC: Where a prepacked item consists of two or more individual packages which are not regarded as units of sale, the net quantity shall be given by indicating <b>the total net quantity and the total number of individual packages.</b>	<b>Section 39 (2) FPackV</b> Where a pre-package consists of multiple packages of different products not intended for individual sale, or where different products are filled separately into a pre-package, the <b>quantities of the individual products</b> shall be indicated.

**Notice:** This implementation guide does not provide guidance on the interpretation of the above legislation. In any case, the manufacturer is responsible for the interpretation and/or application of the Community legislation on labelling of content.

#### 6.4.1 Special case dry yeast

This example of "dry yeast" is an absolute special case. In practice, such products (also applies to baking powder) are usually classified as a multi-pack.

Section 20 (1) and (2)4 FPackV defines the mandatory content information for the dispensing **of dried yeast in a** multi-pack, e.g. transparent plastic packaging with individual packets or "sachets", as follows:

*"(1) Pre-packages containing liquid foods shall be labelled by volume, pre-packages containing other foods by weight.*

*(2) In deviation from Paragraph 1, the following shall be marked*

*4. Pre-packages containing baking powder and baker's yeast with the weight of flour for the processing of which the content is still sufficient after the storage time that is to be expected in circulation."*

If the manufacturer intends to voluntarily indicate the respective content on the individual packages, it must first be determined whether the individual packages constitute separate units of sale, i.e. are sold individually to consumers.

In this example, it is common practice to classify dry yeast as a multi-pack with individual packages intended for sale to the consumer, each representing a separate unit of sale. Thus Section 39 (3) FPackV applies.

The transparent packaging contains 4 fully labelled individual packages, so it is a multi-pack according to Section 39 (3) FPackV.

The content labelling prescribed by the German Pre-packaging Ordinance (FPackV) must contain the following information on the multi-pack (in addition to each individual pack) (Section 39 (3) FPackV):

- the number of individual pre-packages
- the nominal content of each pre-package.

This additional information is not required if:

- the individual pre-packages can be easily counted, and
- the content indication is recognisable on at least one of the individual pre-packages.

The transparent multi-pack makes it easy to count the individual pre-packages and to see all of the labelling elements – including the content of 7 g.

The prescribed labelling of the nominal content is therefore correctly located on the individual pack in accordance with FPackV and reads “7 g”.

According to Section 4 (3) 1 1 of the Price Indication Ordinance, there is an exemption from the obligation to indicate a base price for goods with a nominal weight of < 10 g. This means that there is no base price obligation for this article.



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If “Is trade item a base unit [M243]” = “TRUE” and “Is trade item a consumer unit M247” = “TRUE” and “GPC Brick [M317]”)	28 (GRM)
Gross weight [M279]		32 (GRM)
Net content [M281]		2000 (GRM)
Net content: Description [M282]		4 x 7 g
Drained weight [M280]		---
Is base price declaration relevant [M321]		No (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

### 6.4.2 Combi-pack as consumer unit

**Example:** Minimilk 12-pack, three different varieties not intended for individual sale. Varieties do not have their own GTIN.

A combi-pack is a combination of different types of units (components) in a unit of sale that are not sold separately. The individual components must not be identified by their own GTIN. (A six-pack of beer, on the other hand, is not a combi-pack; each individual bottle is marked with its own GTIN). The above regulations also apply to ice cream in so-called multi-packs (see [Section 6.4](#)).

Problems could occur if the content of the individual packages does not exceed 200 ml. According to Section 22 (2) 5 FPackV, the obligation to indicate the corresponding filling quantity information of the individual pack is in this case no longer applicable, and the multi-pack could possibly contain no information regarding the content.

**Note:** Content information is quite useful, however, and it is recommended to indicate content information on the multi-pack.

In view of the fact that the content is indicated on the packaging and pre-packages containing ice cream must be labelled by volume in accordance with national legislation, the attributes below must be specified in the GDSN for the example shown here.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Net content statement [M282]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		BASE_UNIT_OR_EACH
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]")	276 (GRM)
Gross weight [M279]		377 (GRM)
Net content [M281]		420 (MLT)
Net content statement [M282]		12 pieces
Drained weight [M280]		---
Is base price declaration relevant [M321]		Yes (= TRUE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 6.5 Assortment intended for sale to the consumer, with more than one GTIN

**Example:** Travel pack as an assortment in which all included products are identified by their own GTIN. The travel pack pictured is not a base unit, but is intended for sale to consumers.

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]
- Net content [M281]
- Is base price declaration relevant [M321]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		PACK_OR_INNER_PACK
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" If a value is transmitted, the sum of the individual net weights shall be indicated.	222 (GRM)
Gross weight [M279]		371 (GRM)
Net content [M281]	This information is optional at this hierarchy level (hierarchical level of the trade item). If the number of pieces is indicated on the packaging, 5 pieces must be stored here.	
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]		No (= FALSE)
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 6.6 Homogeneous multi-packs (e.g. Duopack)

A homogeneous multi-pack contains two or more identical products, each with its own GTIN.

In this example, the multi-pack contains two identical packs of Mondamin, each with a net weight of 400 g.

Consequently, the following attributes for the example shown here are to be specified in the GDSN.

- Trade item unit descriptor [ M242]
- Is trade item a consumer unit [M247]
- Gross weight [M279]



Attribute name	Remark	Example
Trade item unit descriptor [M242]		PACK_OR_INNER_PACK
Is trade item a consumer unit [M247]		Yes (= TRUE)
Net weight [M278]	Conditionally mandatory (If "Is trade item a base unit [M243]" = "TRUE" and "Is trade item a consumer unit M247" = "TRUE" and "GPC Brick [M317]" If a value is transmitted, the sum of the individual net weights shall be indicated.	800 (GRM)
Gross weight [M279]		850 (GRM)
Net content [M281]	This information is to be taken from the hierarchy level "BASE_UNIT_OR_EACH".	---
Net content statement [M282]		---
Drained weight [M280]		---
Is base price declaration relevant [M321]	This information does not exist at this hierarchy level (hierarchical level of the trade item). This information as well as the net content must be taken from the hierarchy level "BASE_UNIT_OR_EACH".	---
Price comparison measurement [M322]		---
Product yield type code [M087]		---
Product yield: Value [M085]		---

## 7 Appendix

### 7.1 Brief technical description of the quantity, volume and weight data

Attribute name	Description	GDSN attribute name Module name	Status	Format/ Status
Trade item unit descriptor [M242]	Describes the hierarchical level of the item (e.g. pallet, carton, base unit or each, etc.).	tradeItemUnitDescriptorCode (catalogueItemNotification/catalogueItem/tradeItem)	Mandatory	Code
Is trade item a consumer unit [M247]	Identifies whether the product is designed to be a consumer unit or not. Consumer units are food in pre-packaging, which are intended to be taken possession of, or to be consumed or used by an end user or both.	isTradeItemAConsumerUnit (catalogueItemNotification/catalogueItem/tradeItem)	Mandatory	Boolean
Net weight [M278]	Value of net weight of the trade item.	netWeight (TradeItemMeasurementsModule)	OPTIONAL	n..15 (15.5)
Gross weight [M279]	Gross weight of the base unit or packaging item including the entire packaging material, also those of the packaging items contained. (At pallet level the gross weight includes the weight of the pallet itself.)	grossWeight (TradeItemMeasurementsModule)	MANDATORY	n..15 (15.5)
Net content [M281]	The amount of a trade item contained in the package, as claimed on the label (according to the country-specific regulation on packagings labelling). In case of a multi-pack, the net content of the total trade item. For fixed value trade items use the value on the package to avoid variable fill rate issue that arises with some trade items sold by volume or weight whose actual content may vary slightly from batch to batch. In the case of a product where content can vary, the average value should be used.	netContent (TradeItemMeasurementsModule)	MUST (at base unit level)	n..15 (15.5)
Net content statement [M282]	This statement corresponds to the net content descriptions as stated on the packaging (e.g. "4 x 100g = 400 g")	netContentStatement (avpList/stringAVP TradeItemMeasurementsModule)	OPTIONAL	an..70
Drained weight [M280]	The weight of the trade item when drained off its liquid.	drainedWeight (TradeItemMeasurementsModule)	OPTIONAL	n..15 (15.5)

Attribute name	Description	GDSN attribute name Module name	Status	Format/ Status
Is base price declaration relevant [M321]	An indicator whether or not this item is mandated to have price comparison information included according to country-specific pricing directives.	isBasePriceDeclarationRelevant (SalesInformationModule)	MANDATORY	NonBinaryLogic (TRUE / FALSE)
Price comparison measurement [M322]	The quantity of the trade item at usage. This is applicable for trade items that are concentrated and those where the price comparison is calculated using a measurement other than the net content.	priceComparisonMeasurement (SalesInformationModule)	OPTIONAL	n..15 (15.5)
Product yield type code [M087]	Code indicating the type of yield measurement. Examples: after dilution, after cooking, drained weight, etc.	productYieldTypeCode (FoodAndBeveragePreparationServingModule)	CONDITIONALLY MANDATORY	Code
Product yield: Value [M085]	Information on the yield of a product, i.e. product quantity after preparation.	productYield (FoodAndBeveragePreparationServingModule)	OPTIONAL	n..15 (15.5)
Serving size: Value [M075]	Measurement value specifying the serving size in which the information per nutrient has been stated. Example: Per 250 grams.	servingSize (NutritionalInformationModule)	CONDITIONALLY OPTIONAL	n..9 (9.3)
Serving size description [M074]	Free text field specifying the serving size for which the information per nutrient has been stated. Example: Per 1/3 cup (42 g).	servingSizeDescription (NutritionalInformationModule)	CONDITIONALLY OPTIONAL	an..70
Number of servings per package [M076]	The total number of servings contained in the package.	numberOfServingsPerPackage (FoodAndBeveragePreparationServingModule)	OPTIONAL	n..9 (9.3)
Number of servings range description [M077]	A text description describing the range of servings/portions contained within a trade item. Some items may contain a variance in the number of units or a range; therefore the servings could also vary for the trade item. This attribute should only be used when there is a range of servings. If the number of servings is an exact amount, this should not be used. Ex.: A bag of meatballs may contain 18 – 20 meatballs. Serving size may be 2 meatballs. Therefore the numberOfServingsRange = 9 – 10 servings/portions.	catalogue_item_notification: catalogueItemNotification/ catalogueItem/tradeItem/avp List/stringAVP  @attributeName = numberOfServingsRangeDescription	OPTIONAL	an..70

## 7.2 Net content information on multi-packs according to FPackV and FIR

Type of packaging	Regulation according to FIC	Regulation according to FPackV
<p>Multi-pack containing packaged products that are sold <b>individually</b> to the consumer, i.e. which each constitute a "unit of sale" – six-pack of water (shrink-wrapped). The bottles can usually also be purchased individually. These are pre-packages in a pre-package.</p>	<p>Annex IX No. 3 FIC: Where a prepacked item consists of two or more individual prepacked items containing the same quantity of the same product, the net quantity shall be indicated by mentioning <b>the net quantity contained in each individual package and the total number of such packages.</b></p> <p>The term "prepacked item consist(ing) of two or more individual prepacked items containing the same quantity of the same product" is narrower than the term "multi-pack" according to FPackV because it requires individual packages containing the same quantity.</p> <p>An unwritten criterion is that the individual prepacked items are to be regarded as units of sale. In view of and in delimitation to the case group according to Annex IX No. 4 FIC. In the meaning of this regulation, the purposes of this regulation, the "individual prepacked item" is therefore a "prepacked item".</p> <p>The indication of those particulars shall not, however, be mandatory where the total number of individual packages can be clearly seen and easily counted from the outside and where at least one indication of the net quantity contained in each individual package can be clearly seen from the outside.</p>	<p><b>Section 39 (3) FPackV</b></p> <p>In the case of packages consisting of several pre-packages (multi-packs), <b>in addition to the indication of the nominal content on the individual pre-packages, the number and nominal content of the individual pre-packages shall be indicated on the wrapper of the multi-pack.</b></p> <p>These additional indications shall not be required if the individual pre-packages are visible and easily counted and the indication of the content can be recognised on all of the pre-packages, or in the case of pre-packages with the same nominal content, on one pre-package.</p>

Type of packaging	Regulation according to FIC	Regulation according to FPackV
<p>Multiple package containing <b>similar</b> packaged products that are <b>not sold individually</b> to the consumer, i.e. do not constitute a "unit of sale" – packaging with individual small "pots" of condensed milk. Individual sale is not foreseen and would be unusual.</p>	<p><b>Annex IX No. 4 FIC:</b></p> <p>Where a prepacked item consists of two or more individual packages which are not regarded as units of sale, the net quantity shall be given by indicating <b>the total net quantity and the total number of individual packages.</b></p>	<p>Section 39 (1) FPackV</p> <p>Any person who manufactures, brings into the scope of the Measurement and Calibration Act, places on the market or otherwise makes available on the market a pre-package comprising multiple packages of the same product not intended for individual sale must mark this with the <b>total nominal content and the number of individual packages.</b></p> <p>The number of packages does not have to be indicated if all packages are visible and easily counted.</p>
<p>Pre-packages containing <b>different types of</b> packaged products that are <b>are not sold individually</b> to the consumer, i.e. do not constitute a "unit of sale" – Example: noodles with tomato sauce packaged separately</p>	<p>Annex IX No. 4 FIC:</p> <p>Where a pre-packed item consists of two or more individual packages that are not regarded as units of sale, the net quantity shall be given by indicating <b>the total net content and the total number of individual packages.</b></p>	<p><b>Section 39 (2) FPackV</b></p> <p>Where a pre-package consists of multiple packages of different products not intended for individual sale, or where different products are filled separately into a pre-package, the <b>quantities of the individual products</b> shall be indicated.</p>

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