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# Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets

This guidance supports the development of front of pack nutrition labels that are compliant with the UK Health Ministers' recommendation on the use of colour coding as an additional form of expression and with EU Regulation No. 1169/2011 on the provision of food information to consumers (EU FIC).

The guidance was developed by the Department of Health, the Food Standards Agency, and devolved administrations in Scotland, Northern Ireland and Wales in collaboration with the British Retail Consortium.

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# Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets

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# Introduction

This guidance supports the development and communication of front of pack (FoP) nutrition labels that are compliant with the UK Health Ministers' recommendation on the use of colour coding as an additional form of expression and with EU Regulation No. 1169/2011 on the provision of food information to consumers (EU FIC)<sup>1</sup>. The provision of FoP information remains voluntary, but if provided it must meet the requirements set out in the EU FIC, namely that:

- It should be provided in one of two formats: energy alone or energy plus fat, saturates, sugars and salt (“**energy + 4**”).
- Its provision must meet legibility and font size requirements (EU FIC Article 13(2) and Appendix IV).
- It can be provided per 100g/ml only; per 100g/ml and per portion; or on a per portion basis only (applies only in the case of energy + 4). Where information is provided per portion only for the four nutrients (energy + 4), the absolute value for energy must be provided per 100g/ml in addition to per portion.
- Percentage reference intakes (%RIs) can be given on a per 100g/ml and/or per portion basis. (RIs are specified in Part B of Annex XIII of the EU FIC, and are reproduced in Table 1 on page 12 of this guidance.)
- Where % RI information is provided on a per 100g/ml basis, the statement ‘Reference intake of an average adult (8400kJ/2000kcal)’ is required.
- Additional forms of expression are allowed if they meet requirements set out in the EU FIC which relate to their methods of development, interested party involvement in that process and scientific robustness.
- EU FIC requires energy value to be expressed both in kilojoules (kJ) and kilocalories (kcal).

Voluntary front of pack nutrition labelling cannot be given in isolation; it must be provided in addition to the full mandatory (“back of pack”) nutrition declaration, which comprises energy, fat, saturates, carbohydrate, sugars, protein and salt (Article 30(1) and (3) of the EU FIC).

The FoP scheme outlined in this guidance includes colour coding of nutrients (but not energy). Colour coding is an additional form of expression as provided for in the EU FIC (Article 35). The colours red, amber and green do not represent claims. Recital 46 of the EU FIC states in this context that “the declaration in the same field of vision of the amounts of

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<sup>1</sup> REGULATION (EU) No 1169/2011 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004.

nutritional elements and comparative indicators in an easily recognisable form to enable an assessment of the nutritional properties of a food should be considered in its entirety as part of the nutrition declaration and should not be treated as a group of individual claims.”

The term “reference intakes” (or “RIs”) has replaced “Guideline Daily Amounts” (“GDAs”).

This guidance provides a step-by-step guide through the process of creating a FoP label, with further advice and worked examples provided in the Annexes.

### The basic elements of a FoP nutrition label

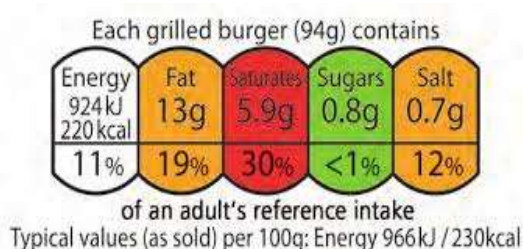
A FoP label developed in accordance with this guidance will contain:

- Information on the energy value in kilojoules (kJ) and kilocalories (kcal) per 100g/ml and in a specified portion of the product.
- Information on the amounts in grams of fat, saturated fat (“saturates”)<sup>2</sup>, (total) sugars and salt in grams, in a specified portion of the product.
- Portion size information expressed in a way that is easily recognisable by, and meaningful to the consumer. For example, ¼ of a pie or 1 burger.
- % RI information based on the amount of each nutrient and energy value in a portion of the food.
- Colour coding of the nutrient content of the food.

Companies may additionally include the descriptors “High”, “Medium” or “Low” (HML) together with the colours red, amber or green respectively to reinforce their meaning.

The FoP label design must not mislead or confuse the consumer.

### Example of colour coded FOP scheme



<sup>2</sup> The term “saturates” must be used on food labels in accordance with the EU FIC.

# Communicating for consistent consumer understanding

This section provides supporting information to help organisations from within the food industry, health and consumer non-governmental organisations, or professional bodies and companies working in diet and nutrition to promote, and explain to consumers how to use, the UK Government's recommended Front of Pack Nutrition labelling scheme.

## Benefits of consistent consumer communication

It is important that consumers understand how to use the voluntary FoP labelling scheme. Research has shown that the use of consistent FoP labelling across as many food products as possible will help consumers to become familiar with its format, and to use it to balance their diet and control their energy intake.

A consistent FoP nutrition labelling scheme across the UK market will improve our ability to educate consumers on how to use this information to improve their diet. Using a consistent and coordinated set of messaging will ensure that the information consumers receive is amplified and consolidated and will help prevent confusion.

Research and modelling have also shown that even small changes to the diet can have significant impacts on individuals' health, and in reducing the costs of ill-health to the economy. Clear FoP nutrition information supports consumers in making healthier choices and realising those benefits.

## Ways to communicate

There are a number of methods that organisations wanting to undertake consumer awareness work could use, for example:

- Website information, mobile apps and social media.
- In store information and promotion.
- Recipe cards, booklets and magazine articles.
- One to one or small group session incorporated into wider education programmes or counselling on diet and health.

## Consistent messages to help consumers understand and use the colour coded FoP label

- Use the front of pack nutrition information to help you eat a healthy diet.
- The colour coded (red, amber and green) labels on the front of pack show you at a glance if the food you are thinking about buying has high, medium or low amounts of fat, saturated fat, sugars and salt, helping you achieve a more balanced diet.

- If you see a red on the front of the pack, it does not mean that you should not or cannot eat it, but that you should try to keep an eye on how often you choose these foods, or how much of them you eat. A diet with fewer reds can help you achieve a healthier diet.
- If you see amber, these foods are neither high nor low for that nutrient. Foods with ambers help you balance your diet; just try to include a few green ones too.
- Green means the food is low in that specific nutrient that you may wish to avoid overconsuming to improve your diet. The more green colours, the healthier the choice, but you don't have to eat only green colour coded foods, including a few ambers and reds can be part of your balanced diet and will help you to get all the beneficial nutrients you need.
- Many of the foods with front of pack labelling that you see in the shops will have a mixture of red, amber and greens. So, when you're choosing between similar products, try to go for more greens and ambers, and fewer reds, to help you eat a healthier diet.
- While the colours provide at glance information, the % RI information will give you a little more detail about how much of an average adult's daily intake limit of each nutrient is in a portion and will help you put it in the context of a healthy balanced diet. For example, 50% RI of salt means that the serving contains half of an average adult's maximum daily intake for salt and so you should try to choose options lower in salt for the rest of the day.
- The %RIs also enable you make more accurate comparisons between equal portions of products. You can use the detailed RI information to help you choose between products that have the same colour per 100g/ml or the same portion size.

### Advice on eating a healthy balanced diet

#### [Eatwell Guide](#)

The Eatwell Guide shows how much of what you eat should come from each food group. This includes everything you eat and drink during the day.

So, try to:

- eat at least 5 portions of a variety of fruit and vegetables every day
- base meals on potatoes, bread, rice, pasta and other starchy carbohydrates; choosing wholegrain versions where possible
- have some dairy or dairy alternatives (such as soya drinks); choosing lower fat and lower sugar options



- eat some beans, pulses, fish, eggs, meat and other proteins (including 2 portions of fish every week, one of which should be oily)
- choose unsaturated oils and spreads and eat in small amounts
- drink 6 to 8 cups/glasses of fluid a day

If consuming foods and drinks high in fat, salt or sugar have these less often and in small amounts.

In addition to the key messages above you could consider using wider government healthy eating messages which can be found within the links listed below.

### **Links to further information**

#### **England and Wales**

[Eatwell Guide](#)

[NHS choices food labelling information](#)

[NHS choices - Livewell General Healthy Eating Advice](#)

[Change for Life Advice](#)

[One you](#)

#### **Northern Ireland**

[Front of Pack Nutrition Labelling](#)

[NI Direct Front of Pack Labelling](#)

[Choose to live Better](#)

#### **Scotland**

[Understanding food labels](#)

[Eatwell Guide](#)

[Eating healthily](#)

[Eat Better Feel Better](#)

# Application of FoP nutrition labelling

## Scope

The application of FoP nutrition labelling remains voluntary, and it is for the individual business to decide on which foods the information will be most useful to consumers. However, there is evidence that market penetration is key to consumers noticing and becoming familiar with the information<sup>3</sup>. Manufacturers and retailers are therefore encouraged to provide FoP labelling on as many of their products as possible where the information is meaningful for consumers.

For example, research<sup>4</sup> has shown that consumers expect to find FoP nutrition labelling on pre-prepared convenience foods, ready meals and other processed products. As a guide, we would not expect to see FoP labelling on those foods listed in [Annex V of the EU FIC](#), as these are exempt from mandatory nutrition labelling.

## As consumed or as sold

The EU FIC provides for the amounts of nutrients and energy value present in 100g/ml and a portion of a product to be given on an 'as sold' or 'as consumed' basis. Nutrition information given on an "as consumed" basis relates to the food as prepared for consumption. In this case, sufficiently detailed preparation instructions must be provided on the label.

It is recommended that the FoP label should clearly reflect the approach used. If the nutrition information is provided 'as consumed', the FoP label should specify the recommended method of preparation or cooking (which will need to be fully detailed elsewhere on the pack) within the portion declaration. For example, '1 grilled burger' or 'each oven-baked fillet'.

The amount of nutrients and energy, the %RI and colour coding and "High", "Medium" or "Low" text where used, should all be calculated on the same basis i.e. 'as sold' or 'as consumed'

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<sup>3</sup> FLABEL (Food Labelling to Advance Better Education for Life) was a 3-year EU funded work programme to examine the factors which lead from labelling to dietary intake. The results of the project are available at <http://flabel.org/en/News/FLABEL-final-webinar>

<sup>4</sup><http://collections.europarchive.org/tna/20101209122142/http://www.food.gov.uk/multimedia/pdfs/citforumfop.pdf>

## Per portion/ per consumption unit

The EU FIC allows front of pack nutrition information on “energy + 4” to be expressed per portion and/or per consumption unit. It is recommended that FoP information, i.e. both the absolute amount in grams and the percentage of the reference intake (%RI), be provided on the basis of a portion that is easily recognisable by and meaningful to, the consumer. For example, ¼ pie or 1 burger. Generally accepted portion sizes should be used wherever possible. However, it is recognised that labelling on the basis of a consumption unit, for example a slice of bread in a loaf, is practicable for some foods where a standard portion size varies according to the eating occasion.

## Multi-component packages

FoP nutrition labelling of packaging containing a mixed assortment of products. For example, a tapas selection, oriental or Indian snacks, biscuit or cake selections, should also be considered carefully. The following advice is offered as a guide, and the method chosen to label any given product will depend on the way it is intended to be consumed and the space available on the label.

- Where products are expected to be eaten in equal quantities, for example dips, nutrition information can be given for a mix of the products on the back of pack and repeated on FoP per suitable portion. For example, 1/3 of a pack. Alternatively, nutrition information on individual components can be provided, per 100g or per 100g plus per portion, on the back of pack alongside per 100g information on the average nutrition of the pack and then an average per portion figure given FoP.
- Where only one product is expected to be eaten per consumer, then full nutrition information can be provided back of pack on the individual products, per 100g or per 100g plus per portion, and the FoP information can be provided for the product with the highest amounts of the 4 FoP nutrients per portion. Alternatively, full nutrition information can be provided for all the products on the back and repeated on the FoP where space permits.

The portion descriptor adjacent to the front of pack nutrition information should make it clear on what basis the information is provided. The number of portions per pack should also be stated on the pack and, where possible, in close proximity to the FoP label.

Our interpretation of EU Regulation No. 1169/2011 is that Article 33(2) allows FoP information on “energy + 4” to be expressed per portion only (with the exception of the *absolute value* for energy, which must be expressed both per 100g/100ml and per portion), even when the back of pack information is expressed per 100g/100ml only. However, the reference product cannot change between the two sets of information. For example, if full nutrition information is provided back of pack on individual products, FoP information provided on the basis of a mix of those products would not constitute the ‘repeat information’ that Article 30(3)(b) requires.

## Nutrition and Health Claims

[EU Regulation No. 1924/2006](#) on nutrition and health claims requires that, if nutrition claims are made on a product, they should be made for the food as ready for consumption. In addition, nutrition claims such as 'low fat' and 'low salt' relate to 100g/100ml and not to a portion or consumption unit. Additional guidance on presentation and calculation of the nutrition declaration can be found at Annex 1.

# Step-by-step guide to constructing a FoP nutrition label

## Introduction

A FoP label developed in accordance with this guidance will contain:

- Information on the energy value in kilojoules (kJ) and kilocalories (kcal) per 100g/ml and in a specified portion of the product.
- Information on the amounts in grams of fat, saturates, (total) sugars and salt in a specified portion of the product.
- Portion size information expressed in a way that is easily identifiable and meaningful to the consumer. For example,  $\frac{1}{4}$  of a pie, 1 burger, (along with the weight).
- Percentage reference intake (% RI) information based on the amount of each nutrient and energy value in a portion of the food.
- Colour coding of the nutrient content of the food.

Companies may additionally include the descriptors “High”, “Medium” or “Low” together with the colours red, amber or green respectively to reinforce their meaning

In order to provide accurate information on your FoP label, you need to know:

1. Number of kilojoules and kilocalories, and the amounts of fat, saturates, (total) sugars and salt<sup>5</sup> per 100g/ml and per portion.
2. Size of a portion described in a manner easily identifiable and meaningful to consumers. For example, half a pack or one burger.
3. Number of portions in a pack.

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<sup>5</sup> Sodium from all sources expressed as salt. This can be determined by multiplying the sodium content of a food by 2.5.

# Annex 1. Portion size indication, information about the amount of each nutrient and energy value present in a portion, and energy per 100g/ml of the product

Information needed:

- Size of a portion described in an easily recognised manner and meaningful to the consumer. For example, half a pack or one burger,
- Number of portions in a pack,
- Amounts of kJ, kcal, fat, saturates, (total) sugars and salt in a portion of the product, and
- The amount of kJ and kcal per 100g/ml.

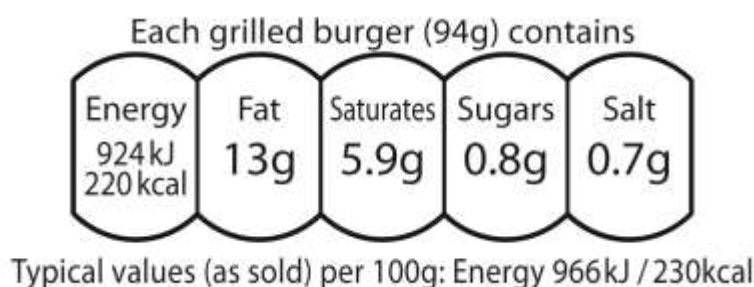
Refer to Annex 1 for further guidance about how the level of nutrients should be declared.

Step 1. The basic information for your FoP label	
<b>Step 1.1</b>	<b>Determine the portion size information</b>
	<p>The size of the portion should be described in a meaningful way, in units which consumers will understand, for example <math>\frac{1}{4}</math> pie, and in grams. It is insufficient to use phrases such as 'each portion' or 'per serving'.</p> <p>The statement should make clear that the information given on the label is based on typical values.</p> <p>The EU FIC requires a statement regarding the number of portions per pack, but does not specify where on the packaging this should be placed. It is recommended that this statement be positioned close to the FoP label if the consumer is likely to be confused about the number of portions a package contains.</p>
<b>Step 1.2</b>	<b>Insert nutrient amounts <u>per portion</u></b>
	<p>The amount of each nutrient should be given in grams or in milliliters.</p> <p>Energy value should be calculated using the conversion factors set out in <a href="#">Annex XIV of the EU FIC</a>. Alternatively, the energy values set out in <i>McCance &amp; Widdowson's The Composition of Foods</i><sup>6</sup> or online in <i>McCance &amp; Widdowson's The Composition of Foods integrated dataset (CoF IDS)</i> on the</p>

<sup>6</sup> Finglas P.M. et al (2015), *McCance & Widdowson's The Composition of Foods*, Seventh summary edition (current edition). Cambridge: Royal Society of Chemistry.

	<p><a href="http://gov.uk">gov.uk</a> can be used.</p> <p>Salt “is defined as” the total sodium in the product multiplied by 2.5.</p> <p>(Definitions for fat, saturates and sugars can be found alongside the definition for salt at Annex I of the EU FIC.)</p>
<b>Step 1.3</b>	<b>Insert energy value per portion</b>
	Energy information should be expressed in kilojoules (kJ) and kilocalories (kcal). Presentation (including font size) of the term “kJ” must have equal or greater prominence to that used for “kcal”.
<b>Step 1.4</b>	<b>Insert energy value per 100g/ml</b>
	Energy information should be expressed in kilojoules (kJ) and kilocalories (kcal). Presentation (including font size) of the term “kJ” must have equal or greater prominence to that used for “kcal”.

**Example step 1 label for a packet of 4 beef burgers sold raw: Basic information – portion size indication and the amount of each nutrient and energy value present in a portion of the product**



## Annex 2. Provision of percentage reference intake (%RI) information

Information needed:

- Amounts of kJ, kcal, fat, saturates, (total) sugars and salt in a **portion** of the product.
- Amounts of kJ and kcal per 100g/ml.
- RIs (part B of Annex XIII of EU FIC – see Table 1 below).  
**Note:** When re-labelling to meet the requirements of EU Regulation 1169/2011, you must use the RIs set out in the Regulation. There is currently no provision in the Regulation for the use of Children’s RIs. The European Commission and Member States have powers to adopt rules setting RIs for “specific population groups” (including children), but have yet to do so. Therefore the only RIs currently permitted are for adults except for reference values for nutrition labelling for certain foods listed under the foods for specific group’s legislation e.g. processed cereal based foods and baby foods for infants and young children.
- General healthy eating information on child size portions can be found at:  
[NHS choices Livewell](#)  
[Change4life](#)

See worked examples A and B (Annex 3) on calculating the correct % RI for a product.

Table 1: Reference intakes (EU FIC Annex XIII part B) for FoP nutrition labels<sup>7</sup>

Energy (kJ)	8,400
Energy (kcal)	2,000
Fat	70g
Saturates	20g
Sugars	90g
Salt	6g

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<sup>7</sup> RIs for fat, saturates, sugars and salt are the maximum amounts that should be consumed in a day. These are the figures currently used on most FoP labels and are ‘adult’ values, based on an average sized woman, doing an average amount of physical activity.



<b>Step 2. % RI information for your FoP label</b>	
<b>Step 2.1</b>	<b>Calculate and insert the % RI for each nutrient</b>
	<p>The calculations for arriving at the correct % RI for each nutrient and energy are as follows:</p> $\frac{\textit{Amount of [nutrient] per portion}}{\textit{RI}} \times 100 = \% \textit{ RI}$ $\frac{\textit{Energy value per portion or 100g or 100ml}}{\textit{RI}} \times 100 = \% \textit{ RI}$ <p>The percentage of the RI should be displayed on the label for each nutrient in a portion of a product, and should be rounded to the nearest whole number. For example, 13.6% should be rounded to 14%.</p> <p>Businesses may choose to express the % RI for energy per 100g/ml, but in that case the statutory statement “Reference intake of an average adult (8400kJ/2000kcal)” must accompany the declaration.</p> <p>If a company chooses not to provide the % RI of energy per 100g/ml, then they will need to consider either the use of the statutory statement or a similar indicator to inform consumers about the meaning of the percentages (see Step 2.2 below).</p> <p>Nutrients present in a portion at less than 1% of the RI may be declared as &lt;1%.</p>
<b>Step 2.2</b>	<b>Insert chosen descriptor for percentage figures. For example:</b>
	<p>“Reference intake of an average adult (8,400kJ/2,000kcal)” or “of the reference intake” or “of your reference intake” or “of an adult's reference intake”.</p>

Example step 2 label for a packet of 4 beef burgers sold raw: Basic information plus reference intakes

Each grilled burger (94g) contains

Energy	Fat	Saturates	Sugars	Salt
924kJ 220kcal	13g	5.9g	0.8g	0.7g
11%	19%	30%	<1%	12%

of an adult's reference intake  
Typical values (as sold) per 100g: Energy 966kJ / 230kcal

## Annex 3. Determining red, amber and green colour coding (and High, Medium and Low (HML) text if applied)

Information needed:

- Amounts of fat, saturates, total sugars and salt per 100g/ml for a product.

If the portion/serving size of the product is more than 100g or 150 ml, you will also need:

- Amounts of fat, saturates, (total) sugars and salt **per portion** (can be calculated using per 100g/ml information and portion size).
- Criteria for red (HIGH), amber (MEDIUM) and green (LOW) as set out below.

**Energy information (kJ and kcal):** Red, amber and green colour coding and HML text should **not** be applied to energy information. Energy information should be provided on a neutral background, which provides good contrast.

Table 2: Criteria for 100g of food (whether or not it is sold by volume)

Text	LOW <sup>8</sup>	MEDIUM	HIGH	
Colour code	Green	Amber	Red	
			>25% of RIs	>30% of RIs
Fat	≤ 3.0g/100g	> 3.0g to ≤ 17.5g/100g	> 17.5g/100g	> 21g/portion
Saturates	≤ 1.5g/100g	> 1.5g to ≤ 5.0g/100g	> 5.0g/100g	> 6.0g/portion
(Total) Sugars	≤ 5.0g/100g	> 5.0g to ≤ 22.5g /100g	> 22.5g/100g	> 27g/portion
Salt	≤ 0.3g/100g	> 0.3g to ≤ 1.5g/100g	>1.5g/100g	>1.8g/portion

**Note:** portion size criteria apply to portions/serving sizes greater than 100g

<sup>8</sup> The low cut off is based on the “low” nutrition claim for fat, saturates, total sugars and salt in the EU Nutrition & Health Claims Regulation legislation (EC) 1924/2006.

Table 3: Criteria for drinks (per 100ml)

Text	LOW <sup>9</sup>	MEDIUM	HIGH	
Colour code	Green	Amber	Red	
			>12.5% of RIs	>15% of RIs
Fat	≤ 1.5g/100ml	> 1.5g to ≤ 8.75g/100ml	> 8.75g/100ml	>10.5g/portion
Saturates	≤ 0.75g/100ml	> 0.75g to ≤ 2.5g/100ml	> 2.5g/100ml	> 3g/portion
(Total) Sugars	≤ 2.5g/100ml	> 2.5g to ≤ 11.25g/100ml	> 11.25g/100ml	> 13.5g/portion
Salt	≤ 0.3g/100ml	>0.3g to ≤0.75g/100ml	> 0.75g/100ml	> 0.9g/portion

**Note:** Portion size criteria apply to portions/serving sizes greater than 150ml

The supplementary information on applying the criteria in Annex 2 should be read before working out the colour coding and/or HML text for your product.

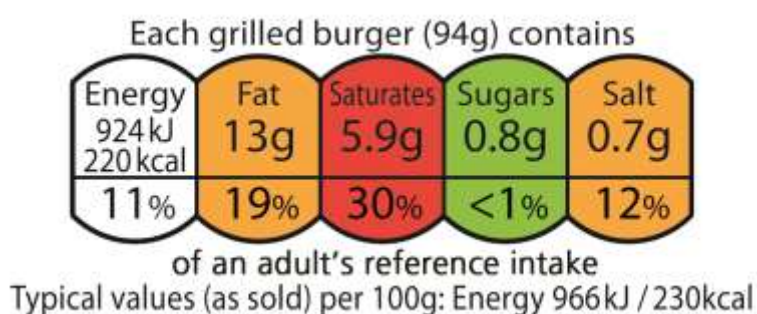
In Annex 3, worked example A illustrates how to arrive at the correct red, amber and green colour coding and HML text for foods, and worked example B for drinks.

<sup>9</sup> The low cut off is based on the “low” nutrition claim for fat, saturates, sugar and salt in the EU Nutrition & Health Claims legislation (EC) 1924/2006

Step 3 Red, amber and green colour coding (and HIGH, MEDIUM and LOW text if provided) for your FoP label	
Step 3.1	Is it a food or drink product?
	For food products use the criteria in Table 2 and for drinks use the criteria in Table 3.
Step 3.2	Is the portion size of the food more than 100g or of the drink more than 150 ml?
	<p>If yes, follow the instructions below. If no, go to step 3.3.</p> <p>Check the amount of fat, saturates, (total) sugars and salt <b>per portion</b> against the red (HIGH) per portion criteria.</p> <p><b>If any of the nutrients are present in levels in excess of their respective cut-off points, then they must be labelled red (HIGH) (regardless of the levels present per 100g/ml).</b></p> <p>To colour code any nutrients that have not been labelled red (HIGH), go to Step 3.3.</p>
Step 3.3	Check the amounts of fat, saturates, sugar and salt against the per 100g criteria for foods (Table 2), and per 100ml criteria for drinks (Table 3).
	Apply colour coding (and optional HML text) to your FoP label accordingly.

Below is an illustration of a FoP nutrition label with an acceptable portion size indication; the amount of each nutrient and energy value (kJ and kcal) present in a portion of the product; % RI information; and red, amber and green colour coding.

**Example Step 3 label for a packet of 4 beef burgers sold raw: Basic information with reference intakes and colour coding:**



Note further guidance on pantones and shades of colours that can be used can be found at page 30 of this guidance.

## Annex 4: Providing a portion size indication and information about the amount of each nutrient and energy value present in a portion of the product

This Annex provides advice on terminology, units of measurement and rounding off nutrition declarations.

The terminology and units of measurement that can be used are set out in the EU FIC. Guidance on the appropriate number of decimal places (based on per 100g/ml) and on when 0g can be used is set out in the Commission's guidance on tolerance (December 2012)<sup>10</sup>. This guidance as it relates to FoP nutrition labelling is summarised below.

Terminology, units of measurement and number of decimal places suitable for use on FoP labels

Terminology	Unit of measurement	Amount	Rounding
Energy	kJ and kcal		to nearest whole 1 kJ/kcal (no decimals)
Fat, sugars	g	≥10g per 100g or ml	to nearest 1g (no decimals)
		<10g and > 0.5g per 100g or ml	to nearest 0.1g
		no detectable amount is present or concentration is ≤ 0.5g per 100g or ml	"0g" or "<0.5g" may be declared
Saturates	g	≥10g per 100g or ml	to nearest 1g (no decimals)
		<10 and > 0.1g per 100g or ml	to nearest 0.1g
		no detectable amount is present or concentration is ≤ 0.1g per 100g or ml	"0g" or "<0.1g" may be declared
Salt	g	≥1g per 100g or ml	to nearest 0.1g
		<1g and > 0.0125g per 100g or ml	to nearest 0.01g
		no detectable amount is present or concentration is ≤ 0.0125g per 100g or ml	"0g" or "<0.01g" may be declared

<sup>10</sup> [http://ec.europa.eu/food/food/labellingnutrition/nutritionlabel/index\\_en.htm](http://ec.europa.eu/food/food/labellingnutrition/nutritionlabel/index_en.htm)

## Determination of red, amber and green colour coding

This information provides further guidance on how to determine red, amber and green colour coding for FoP labels.

There are separate criteria for food and drinks.

### 'Per portion' criteria for food and drink products

Red, amber and green colour coding for each nutrient is, in the main, determined on a per **100g/ml basis**. However, there are also '**per portion**' criteria for red which are applied to **food products** sold in portion sizes greater than 100g and **drinks** served in portion sizes over 150 ml. These additional criteria ensure that products which contribute more than 30% (for food) and 15% (for drinks) of an adult's recommended daily maximum intake for a particular nutrient are labelled as red (HIGH) for the respective nutrient, regardless of their content per 100g/ml.

### Sugars

The red, amber and green colour coding for sugars is determined based on total sugars in accordance with the EU FIC.

However, the following text: "WITH NO ADDED SUGARS"

or any claim likely to have the same meaning for the consumer may be used where the product does not contain any added mono- or disaccharides or any other food used for its sweetening properties. Where the claim 'WITH NO ADDED SUGARS' is used on foods where sugars are naturally present in the food, the following indication should also appear on the label: 'CONTAINS NATURALLY OCCURRING SUGARS'.

This text should be used in compliance with the rules for use of nutrition claims in Regulation 1924/2006. Examples of ways in which this could be presented are:

'This product has no added sugars but contains naturally-occurring sugars' or

'The colour code reflects the total amount of sugars in this product. The product contains no added sugars, but the [milk] [raisins and sultanas] in it contain[s] naturally-occurring sugars.'

### Fats

There will be some food products containing ingredients such as, nuts, seeds, and oily fish where significant amounts of fat come from those ingredients and is naturally occurring. The declaration of saturates alongside total fat will give consumers some idea of the balance of fats contained in the product. However, manufacturers may also wish to further highlight particular benefits of their products.

There are a number of authorised health claims set out, alongside their conditions of use, in the [Annex to EU Regulation No. 1924/2006](#) that may apply.

## Worked examples

### Worked example A: Determining the % RI information and colour coding for a **food** product

**Product: Ready meal**

Nutrition Information	Per 100g	Per Portion (400g)
Energy	353kJ/84kcal	1,411kJ/336kcal
Fat	2.2g	8.8g
Saturates	0.4g	1.6g
Sugars	1.5g	6.0g
Salt	0.35g	1.4g

#### Step 2.1: calculate the % RI for energy and each nutrient

- To determine % RI, you only require nutrition information for energy (kilojoules and kilocalories), fat, saturates, total sugars and salt per portion.

RIs (EU FIC: Annex XIII, part B):

Energy	8400kJ
Energy	2000kcal
Fat	70g
Saturates	20g
Sugars	90g
Salt	6g

$$\frac{\text{Amount of nutrient or energy per portion}}{RI} \times 100 = \% RI$$

Energy (kJ) ►  $\frac{1,411}{8,400} \times 100 = 16.8\%$  (17% rounded to the nearest whole number)

Energy (kcal) ►  $\frac{336}{2,000} \times 100 = 16.8\%$  (17% rounded to nearest whole number)

Fat ►  $\frac{8.8}{70} \times 100 = 12.57\%$  (13% rounded to nearest whole number)

Saturates ►  $\frac{1.6}{20} \times 100 = 8\%$

Sugars ►  $\frac{6.0}{90} \times 100 = 6.7\%$  (7% rounded to nearest whole number)

Salt ►  $\frac{1.4}{6} \times 100 = 23.3\%$  (23% rounded to nearest whole number)



Where information is presented per portion, the EU FIC requires the absolute value for energy to be expressed per 100g/ml in addition to per portion. Companies can choose whether they include a % RI for the energy value per 100g/ml, but if they do, they are required to provide the statutory statement “Reference intake of an average adult (8,400kJ/2,000kcal)”.

Where a % RI is not provided for energy per 100g, businesses will need to consider the use of the statutory statement or a similar indicator (“Reference intake of an average adult (8,400kJ/2,000kcal)” or “of the reference intake” or “of your reference intake” or “of an adult's reference intake”) to inform consumers about the meaning of the percentages. This text should be placed at the bottom of your FoP label.

**Step 3.1: Is it a food or drink product?**

It is a food product, so go to Step 3.2 of the step-by-step guide.

**Step 3.2: Is the portion/serving size of the product more than 100g?**

Yes.

Are any of the following nutrients present in amounts per portion that exceed the criteria for red per portion?

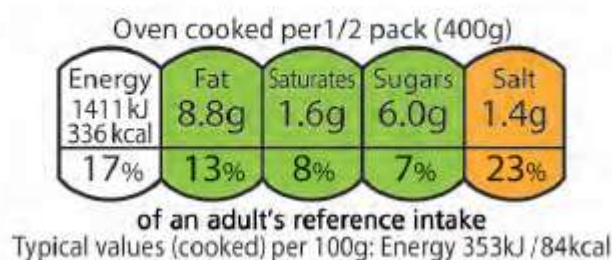
- Fat ▶ No
- Saturates ▶ No
- (Total) sugars ▶ No
- Salt ▶ No

None of the nutrients is present in amounts that meet the criteria for red per portion, therefore the per 100g criteria should be used for all nutrients.

**Step 3.3: Check the amount of fat, saturates, sugars and salt against the per 100g criteria and apply colour coding accordingly.**

- Fat (2.2g/100g) ▶ green
- Saturates (0.4g/100g) ▶ green
- (Total) sugars (1.5g/100g) ▶ green
- Salt (0.35g/100g) ▶ amber

Example label: Basic information, reference intakes and colours as determined above



## Worked example B: Determining the % RI information and colour coding for a **drink** product

### Product: Smoothie

Nutrition Information	Per 100ml	Per Portion (200ml)
Energy	260kJ	521
Energy	62kcal	124
Fat	0.2g	0.4g
Saturates	0.1g	0.1g
Total sugars	12.0g	24.0g
Salt	trace	trace

#### Step 2.1: calculate the % RI for energy and each nutrient.

- To determine % RI, you only require nutrition information for energy (kilojoules and kilocalories), fat, saturates, (total) sugars and salt per portion.

RI's (EU FIC: Annex XIII, part B):

Energy	8,400kJ
Energy	2,000kcal
Fat	70g
Saturates	20g
Sugars	90g
Salt	6g

$$\frac{\text{Amount of nutrient or energy per portion}}{RI} \times 100 = \% RI$$

Energy (kJ) ►  $\frac{521}{8,400} \times 100 = 6.2\%$  (6% rounded to the nearest whole number)

Energy (kcal) ►  $\frac{124}{2,000} \times 100 = 6.2\%$  (6% rounded to the nearest whole number)

Fat ►  $\frac{0.4}{70} \times 100 = 0.6\%$  (<1%)

Saturates ►  $\frac{0.1}{20} \times 100 = 0.5\%$  (<1%)

Sugars ►  $\frac{24.0}{90} \times 100 = 26.7\%$  (27% rounded to nearest whole number)

Salt ►  $\frac{\text{trace}}{6} \times 100 = < 1\%$

## Step 2.2: Insert text at the bottom of your label.

Where FoP information is presented per portion for drinks, the EU FIC also requires the absolute value for energy to be expressed per 100ml in addition to per portion. Companies can choose whether they include a % RI for the energy value per 100ml, but if they do they are required to provide the statutory statement “Reference intake of an average adult (8,400kJ/2,000kcal)”.

Where a % RI is not provided for energy per 100ml, businesses will need to consider the use of the statutory statement or a similar indicator (“Reference intake of an average adult (8,400kJ/2,000kcal)” or “of the reference intake” or “of your reference intake” or “of an adult’s reference intake”) to inform consumers about the meaning of the percentages. This text should be placed at the bottom of your label.

## Step 3.1: Is it a food or drink product?

It is a drink, so go to Step 3.2

## Step 3.2: Is the portion/serving size of the product more than 150ml?

Yes.

Are any of the following nutrients present in amounts per portion that meet the criteria for red per portion?

Fat	▶	No
Saturates	▶	No
(Total) sugars	▶	Yes
Salt	▶	No

Only (total) sugars meet the criteria for red per portion. For all other nutrients, the per 100ml criteria should be used.

## Step 3.3: check amounts of fat, saturates and salt against the per 100ml criteria and apply colour coding.

Fat (0.2g/100ml)	▶	green
Saturates (0.1g/100ml)	▶	green
Salt (trace/100ml)	▶	green

Example label: Basic information, reference intakes and colours as determined above



# Annex 5: Design, presentation and positioning of FoP labels

## Introduction

This document provides guidance on a number of presentational elements of FoP labelling. The manner in which some of the elements have to be provided is specified in EU Regulation 1169/2011 on the provision of food information to consumers (EU FIC).

The examples used to illustrate the different presentational elements should not be assumed to be current or future policy for any specific retailer.

This advice has been produced by the British Retail Consortium. A number of design specialists have provided their expertise. Feedback was also provided from specialists on colour blindness.

## Format

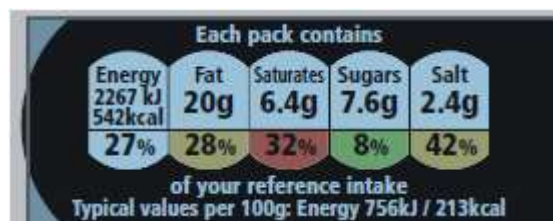
### Lozenge

The approach that will be used on front of pack will be a combination of %RI and colour coding (red, amber and green).

The nutrition information will be presented in a series of “lozenges”.

The EU FIC states that this information must be provided in characters using a font size where the x-height is equal to or greater than 1.2 mm.

Here is an example:

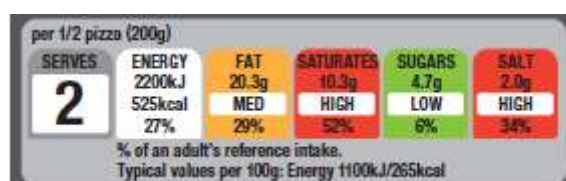


### Per 100g/100ml information

The EU FIC requires energy information to be given per 100g/100ml whenever any voluntary front of pack nutrition information is provided.

In the context of this national scheme, companies should provide the 100g/100ml energy information as text in close proximity to the per portion lozenges.

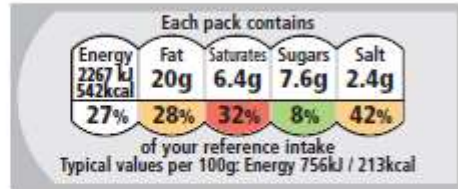
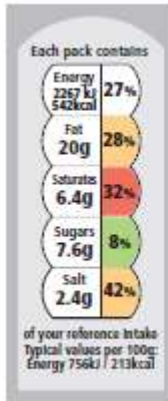
The EU FIC requires the units to be used for energy information to be kJ and kcal. Reference to “calories” or “cals” cannot be used.



## Horizontal vs vertical

For the majority of products the information should be provided in a horizontal format. However, some pack formats mean a vertical approach is cleaner.

In every case the FoP label will look like a series of lozenges.



## Nutrients

### Options

The Regulation EU FIC provides two options for front of pack nutrition labelling:

Option 1 – energy only

Option 2 – energy, fat, saturates, sugars and salt.

Companies should use option 2 wherever possible. Examples where option 1 may be appropriate are:

- Small packs, for example small condiment jars
- Multilanguage packs
- Individual components within a multipack. In this case, option 2 will be used on the outer pack and option 1 will be used on the individual components.
- Products with limited label space due to their pack shape, for example small yoghurt pots and cans of fish.



## Terminology and order of nutrients

The name and order of the nutrients is set out in the EU FIC and will be presented on the front of pack:

### **Energy / Fat / Saturates / Sugars / Salt**

The Regulation does not allow any other nutrient in the repeat nutrition information on the front of food packaging.

## Reference intakes

EU FIC states the reference intakes (RIs) for each nutrient.

The percentage reference intake should be provided for each nutrient. The percentages should be rounded to the nearest whole number.

For consistency on pack, only the term reference intake (RI) should be used and this replaces the current practice of using Guideline Daily Amount (GDA).

## Design

### Colour

Only the lozenges containing the information on fat, saturates, sugars and salt will be coloured.

The colours used should be vibrant. The use of pastel colours should be avoided.

The colours and process used to colour the lozenges will depend on the type of packaging material and other colours used on pack.

When establishing the colours to be used, strong consideration must be given to the clarity and legibility of the information given. This will be determined by good contrast between the colours and the text.

The shade, tone and intensity of the colours (Pantone or CMYK) that companies should aim to produce through their colour processes are:

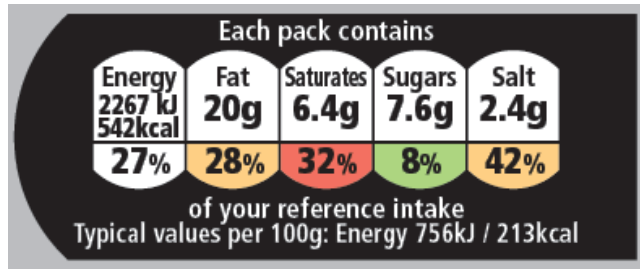
Green:	PMS 375, or	C: 48%	M: 0%	Y: 94%	K: 0%
Amber:	PMS 143, or	C: 0%	M: 36%	Y: 87%	K: 0%
Red:	Red 032, or	C: 0%	M: 90%	Y: 86%	K: 0%



## Quantity of colour

A block of colour will be included in the lozenge. At least one third of the lozenge should be coloured.

It is not acceptable to just use colour to surround the lozenge or to only colour the words or numbers.



## Contrast

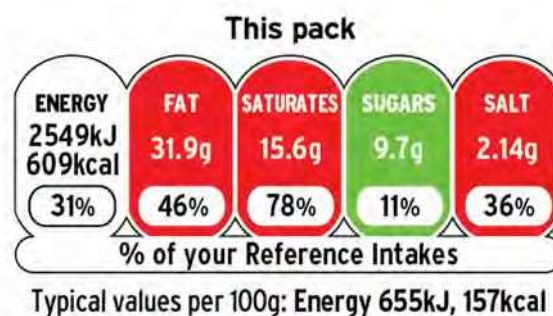
There should be clear contrast between the background and the colour used for the font (numbers). Examples of good contrast are:

- white font on coloured background
- dark colour or black font on white background
- dark colour or black font on a coloured background

The colour management should deliver a good contrast between the traffic light colours, especially the amber and red. The lozenges and accompanying text should not be obscured by graphics on pack. Companies should avoid placing images directly behind the signpost.

## Delineation

There should be clear delineation between lozenges to enable all consumers to be able to differentiate the colours. This may also be achieved by the voluntary use of “High”, “Medium” or “Low” text within the design.



## Location on pack

The information will always be provided in the principal field of vision, as required by EU FIC. The Regulation defines 'principal field of vision' as: *the field of vision of a package which is most likely to be seen at first glance by the consumer at the time of purchase and that enables the consumer to immediately identify a product in terms of its character or nature and, if applicable, its brand name. If a package has several identical principal fields of vision, the principal field of vision is the one chosen by the food business operator.*

The position of the information will be determined by many factors including brand position, additional information on pack, pack size and shape. The positioning of the information will also be dependent on space and legibility.





