Front of Pack Nutritional Signpost Labelling

Technical Guidance

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Front of Pack Nutritional Signpost Labelling - Technical Guidance

These guidelines set out the core elements identified by the Food Standards Agency Board[1] as the basis for helpful front of pack nutritional signpost labelling approaches and outline the nutritional criteria which underpin the red, amber and green (or high, medium, low) bands for the 'traffic light' colours recommended by the Agency.

The findings from consumer research undertaken by the Agency[2], and the views of a wide range of stakeholders including public health bodies, consumer organisations, food manufacturers, retailers and advisory groups have been used to develop this guidance. The guidance intends to provide consistency in the application of the Agency's recommendations.

In order to satisfy the Agency's recommendations for front of pack nutritional signpost labelling, the front of pack nutritional signpost labelling logo execution must accommodate each of the following four core elements:

- **separate information on fat, saturated fat, sugars and salt;**

- **red, amber or green colour coding to provide at a glance information on the level (i.e. whether high, medium or low) of individual nutrients in the product;**

- **provision of additional information on the levels of nutrients present in a portion of the product; and**

- **use of the nutritional criteria as set out in this document to determine the colour banding.**

In addition:

- The signpost should clearly indicate if information on the levels of nutrients present in a portion is as sold or as consumed.

- Additional information on calories and GDAs is optional.

- Any other front of pack logos used to communicate messages about beneficial nutrients in the food, such as calcium, iron or fibre must comply with legislative requirements, and should be separate from the signpost bearing information about fat, saturated fat, sugars and salt.

Appendix 1 gives advice on design issues and includes some examples of design executions that incorporate the core elements of the Agency's signpost labelling approach.

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[1] http://www.food.gov.uk/aboutus/ourboard/boardmeetings/boardmeetings2006/boardmeeting90306/agenda9mar06
[2] Qualitative preference research http://www.food.gov.uk/foodlabelling/signposting/signpostingreport/;
Qualitative preference research focussing on optimisation of GDA based formats
http://www.food.gov.uk/multimedia/pdfs/signpostingnavigatorreport.pdf;
Quantitative performance research www.food.gov.uk/foodlabelling/signposting/alt;
Quantitative research looking at the application of signpost labelling www.food.gov.uk/foodlabelling/signposting/refine

1. Scope of approach

The Agency sought consumer views on which products front of pack nutritional signpost labelling should be applied to. This research found that consumers felt it would be most helpful on composite, processed foods, which they had difficulty determining the nutritional content of. Based on the results of this consumer research, the Agency recommends front of pack nutritional signpost labelling for the following products:

- **Sandwiches, wraps, filled baguettes and similar products**

- **Prepared or ready meals, whether hot or cold (for example pasta salad bowls, prepared salad meals such as chicken caesar salad and prepared dishes sold with and without accompaniments such as rice, noodles, vegetables, potato or similar)**

- **Burgers, sausages**

- **Pies, pasties and quiches**

- **Breaded or coated or formed meat, meat alternative, poultry, fish and similar products including those in sauces (for example chicken nuggets, fish fingers, chicken kiev, fish in parsley sauce, meat balls, lamb grills)**

- **Pizzas**

- **Breakfast cereals**

In the case of breakfast cereals it is recognised that further consumer research is needed to understand how consumers consider nutritional information for breakfast cereals should be presented, particularly in relation to sugars and breakfast cereals which contain high levels of fruit. The Agency will carry out this additional consumer research in early 2007. A small advisory group will assist in developing this research.

The Agency recognises that some businesses may want to apply its front of pack nutritional signpost labelling approach more widely. The potential added benefit to consumers of widening the approach beyond the products above will vary across product categories. For example, where clear advice is to eat more, such as for fresh fruit and vegetables, the added benefit of a front of pack nutritional signpost label is unclear.

2. The colour code

2.1 Nutritional criteria

The traffic light colour approach to nutritional signpost labelling requires criteria that define the green/amber (low/medium) and amber/red (medium/high) boundaries for the key nutrients (fat, saturated fat, salt and sugars). The criteria are set out in Table 1.

Table 1 – Food (per 100g whether or not they are sold by volume)

	Green (Low)	Amber (Medium)	Red (High)	
Fat	≤ 3.0 g/100g	> 3.0 to ≤ 20.0 g/100g	> 20.0 g/100g	> 21.0g / portion
Saturates	≤ 1.5 g/100g	> 1.5 to ≤ 5.0 g/100g	> 5.0 g/100g	> 6.0g / portion
Total Sugars	≤ 5.0 g/100g	>5.0 to ≤ 15.0 g/100g	> 15.0 g/100g[3]	> 18.0g / portion[3]
Salt[4]	≤ 0.30 g/100g	>0.30 to ≤ 1.50g/100g	> 1.50 g/100g	> 2.40g / portion[5]

For foods where the per portion criteria apply, the nutrient must be labelled red (high) regardless of its per 100g profile if the per portion criteria are met. From 2008 the per portion criteria will apply to all foods with a serving size of greater than 100g. In the intervening period, we suggest that the per portion criteria be used if the serving size is 250g or greater, but companies may wish to adopt a phased approach for using the per portion criteria to foods with a serving size of between 100g and 250g.

The colour code should be based on nutritional information for foods 'as purchased' with the following exceptions:

- dried foods which should be assessed 'as reconstituted', for example dried noodle meals.

- where all the nutritional labelling on pack, including group 2 nutritional labelling, is provided as consumed, then the colour code for front of pack labelling can also be assessed on an 'as consumed' basis provided this is clearly stated.

Whilst the Agency is not recommending nutritional signpost labelling on drinks, the criteria in Table 2 should be followed if manufacturers of drinks choose to apply signpost labelling to their products.

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[3] The Agency has asked SACN to review and advise on intakes of sugars as part of its future work programme.

[4] Sodium from all sources expressed as salt.

[5] To be reviewed in 2008 to reflect progress on salt reduction work.

Table 2 – Drinks (per 100ml)

	Green (Low)	Amber (Medium)	Red (High)
Fat	≤ 1.5 g/100ml	> 1.5 to ≤10.0 g/100ml	> 10.0g/100ml
Saturates	≤ 0.75 g/100ml	> 0.75 to ≤2.5 g/100ml	> 2.5g/100ml
Total Sugars	⩽ 2.5 g/100ml	>2.5 to ≤7.5 g/100ml	> 7.5 g/100ml
Salt[4]	≤ 0.30 g/100ml	> 0.30 to ≤1.50g/100ml	> 1.50 g/100ml

The criteria will be reviewed in 2008.

2.2 How to apply the nutritional criteria

The appropriate traffic light colour for the signpost for any food is determined by following the 3 steps outlined below:

Step 1:   Use the criteria in Table 1 for foods and Table 2 for drinks.

Step 2:   Determine the colour code for each nutrient based on per 100g or per 100ml of the product.

Step 3:   Check the portion size of the product as specified on the packaging. If the portion size is greater than or equal to 250g, then the alternative red (high) per portion criteria outlined in Table 1 applies. If any nutrient meets this red (high) per portion criteria it must be labelled red (high), regardless of its per 100g profile.

Where a selection of products is packaged together, for example a "take-away pack", then an average value of all the products should be used.

To help ensure the criteria are applied correctly some worked examples are attached at Appendix 2 which illustrate how to arrive at the correct colour coding for each nutrient.

2.3 How the nutritional criteria were developed

The green/amber boundaries are determined by the new EU legislation on Nutrition and Health Claims.

The amber/red (medium/high) boundaries are based on existing advice from COMA and SACN for fat, saturated fat and salt using 25% of recommended intake levels per 100g and 30% (40% for salt) per portion. The amber/red boundaries for fat, saturated fat and salt were agreed at the Agency's March 2006 Board meeting.

Setting the amber/red (medium/high) boundary for sugars is a complex task since nutrition information, for practical reasons, is given for total sugars but neither COMA nor SACN has provided advice on intakes of total sugars. An independent sugar review group was therefore set up to recommend an appropriate boundary based on

total sugars. It noted the COMA advice on recommended intakes of non-milk extrinsic sugars (NMES, i.e. added sugars including extrinsic fruit sugars such as in fruit juice) and took this into account when developing the amber/red boundary for sugars. The criteria developed use COMA's advice on NMES as the basis for the approach and include an adjustment based on the levels of fruit and milk sugars likely to be present in processed foods. For sugars, the per 100g amber/red boundary is set at 25% of the 50g DRV for NMES plus 2.5g to take account of intrinsic sugars. The per portion boundary is set at 30% of the DRV for NMES plus 3g to take account of intrinsic sugars. These criteria apply to total sugars.

It should be noted that neither the Agency nor the sugar review group has made any comment on the suitability or otherwise of any of the IGD GDA values, including total sugars.

Because of the complexity of this issue, and the range of different views, consumer research is to be carried out as described in section 1, and SACN advice will be sought on sugars intakes. These, and other criteria, will be reviewed in 2008 taking account of further information available at this time.

2.4 Additional notes on sugars labelling aspects

The EU regulation on Nutrition and Health Claims defines sugars in accordance with the definition set out in the EU Directive 90/496/EEC on nutrition labelling of foodstuffs (i.e. all monosaccharides and disaccharides present in food, but excludes polyols).

The regulation also states that claims indicating that "sugars have not been added" may only be used where the product does not contain any added mono- or disaccharides or any other food used for its sweetening properties. However where sugars are naturally present in the food it advises that the following indication should appear on the label "contains naturally occurring sugars".

3. Front of pack labelling per serving information

Information given in the signpost on the levels of nutrients present in a portion of a product should be appropriate and based on realistic portion sizes. Where possible commonly used portion sizes should be used.

Details of portion size used must be indicated clearly on the product packaging.

The levels of nutrients present in a portion of a product can be given on an 'as purchased' or 'as consumed' basis. The approach used should be clearly stated. If 'as consumed', then this should also specify the recommended method of preparation or cooking.

As a general rule, use "trace", or similar terms such as "nil" or "negligible", when a nutrient is present in less than 0.1g per 100g/100ml although declarations of "0g" may be used. Figures of between 0.05g and 0.15g can however, be rounded to 0.1g and that value used instead.

Appendix 1

Synopsis of design

The Agency is not seeking to determine the design of individual approaches, but to provide advice on design issues as a starting point for those who may wish to use it. The following information is intended as a guide only for the signpost visuals and is not prescriptive. It is based on the visuals the Agency used during its consumer research.

- Agenda Bold is the typeface used in the signpost visuals in this guidance and was chosen for its clarity and legibility. Nutrients are in bold, upper and lower case. Where high, medium and low descriptors are included, these are bold and uppercase.

- Text included in the signpost should ideally be in black. Text within the colour coded areas of the signpost may be in black /or white.

- The pantones of the traffic light colours used in the signpost have been chosen to ensure that there is good colour contrast between the colour and text. The shade, tone and intensity of the red, amber and green colours used are as follows: Green: Pantone 376, CMYK specifications: C 53, M 0, Y 85, K 0; Amber: Pantone 143, CMYK specifications: C 0, M 40, Y 99, K 0; and Red: Pantone 1788, CMYK specifications: C 0, M 90, Y 75, K 0.

- Feedback on some designs that are currently being used in the marketplace suggests that colour blind consumers find it helpful if there is a space between the traffic light colours for individual nutrients, especially where high, medium and low descriptors have not been incorporated into the design.

- When the signpost is applied to packaging that does not include colour, such as 'economy' products or similar, use the predominant dark colour of the pack and white, for monochrome front of pack nutritional signpost labelling which gives maximum contrast. Similarly in the case of certain types of packaging where the printing technique only allows a very limited colour spectrum, for example some flexopacks, flexible films and transparent packaging materials a monochrome front of pack label can be used.

- On metallic and shiny surfaces, a matt-finish eases legibility.

- The signpost should be easily visible and scaled in proportion with the size of the product, as a guide the following are suggested:
  - Use 10 point font on product packs with dimensions of approx. 200mm x 300mm (e.g. breakfast cereal).
  - Use 8 point font on product packs with dimensions of approx. 200mm x 200mm (e.g. >350g ready meal packs, boxes of burgers etc)
  - Use 6 point font on product packs with dimensions of approx. 180mm x 150mm (e.g. twin sandwich pack).
  - The minimum font size that should be used is 4 point.

Signpost position

- Position the signpost in a consistent place on the front of pack where it is clearly seen. In the Agency's research it was positioned on front of pack, bottom left.

- Position the signpost in the same field of vision as the product fancy, brand or trade name, and if possible in a place consistent with use in other labels. Take care to ensure that the text is not distorted.

- In the case of multi-pack products or selection packs, place the signpost on the outer packaging. It can also be repeated on individual products.

- Do not place images behind the signpost (watermarking).

Exemplar signpost formats

The following are examples of variations of signposting formats which meet the core elements of the Agency's Proposed Signposting approach.
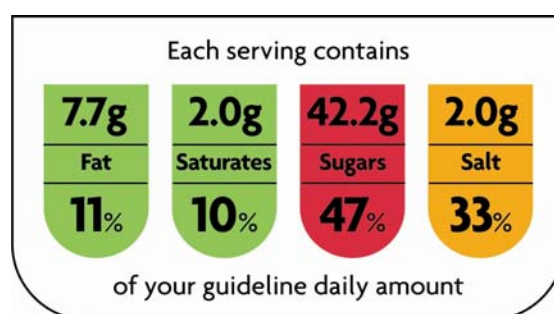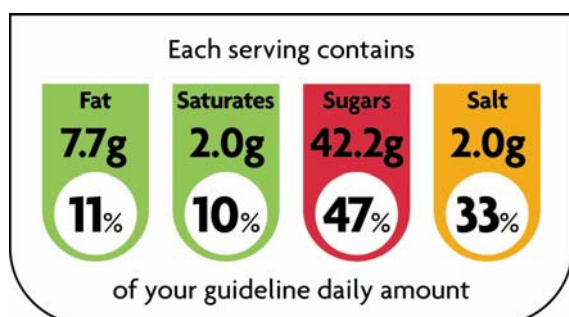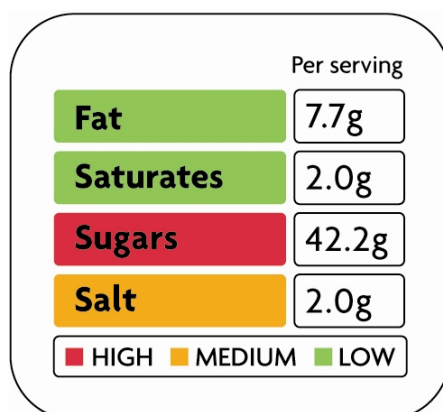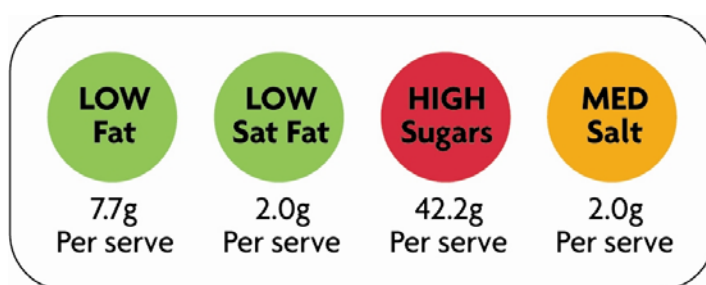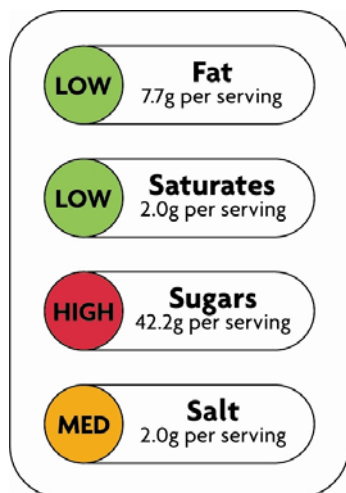
Appendix 2

Worked examples using the Agency's nutritional criteria

Product 1 – Ready meal

	Per 100g	**Per portion (400g)**
Fat	2.2g	8.8g
Saturates	0.4g	1.6g
Sugars	1.5g	6g
Salt	0.35g	1.4g

- As this is a food product, Table 1 will be used to determine the signpost.

- The portion size of this product exceeds 250g, therefore the amount of each nutrient per portion needs to be checked.

- None of the nutrients in a portion of this product are present in amounts that exceed the 'high' per portion criteria, therefore the classification derived using the per 100g information is valid.

	Banding
Fat	Green
Saturates	Green
Sugars	Green
Salt	Amber

Product 2 – Ready meal

	Per 100g	**Per portion (400g)**
Fat	6g	24g
Saturates	0.4g	1.6g
Sugars	1.5g	6g
Salt	0.35g	1.4g

- As this is a food product, Table 1 will be used to determine the signpost.

- The portion size of this product exceeds 250g, therefore the amount of each nutrient per portion needs to be checked.

- The amount of fat in a portion of this product exceeds the 'high' per portion criteria so this will override the classification derived using the per 100g criteria for this nutrient. For all remaining nutrients, the classification derived using the per 100g information is valid.

	Banding
Fat	Red*
Saturates	Green
Sugars	Green
Salt	Amber

classification using per portion criteria.

Product 3 – Ready meal

	Per 100g	Per portion (400g)
Fat	6g	24g
Saturates	2.5g	10g
Sugars	5g	20g
Salt	0.6g	2.4g

- As this is a food product, Table 1 will be used to determine the signpost.

- The portion size of this product exceeds 250g, therefore the amount of each nutrient per portion needs to be checked.

- All of the nutrients in a portion of this product are present in amounts that exceed the 'high' per portion criteria, therefore this will override the classification derived using per 100g criteria for all nutrients.

	Banding
Fat	Red*
Saturates	Red*
Sugars	Red*
Salt	Red*

classification using per portion criteria.

Product 4 - Meal centre (e.g. chicken fillet burger).

	Per 100g	Per portion (90g)
Fat	4.3g	3.9g
Saturates	0.7g	0.6g
Sugars	0g	0g
Salt	0.75g	0.75g

- As this is a food product, Table 1 will be used to determine the signpost.

- The portion size of this product does not exceed 250g, therefore the per portion information does not need to be checked.

	Banding
Fat	Amber
Saturates	Green
Sugars	Green
Salt	Amber

Product 5 – Pizza

	Per 100g	**Per portion (235 g)**
Fat	7.1g	16.7g
Saturates	4.0g	9.4g
Sugars	4.4g	10.3g
Salt	0.9g	2.1g

- As this is a food product, Table 1 will be used to determine the signpost.

- The portion size of this product does not exceed 250g, therefore the per portion information does not need to be checked.

	Banding
Fat	Amber
Saturates	Amber
Sugars	Green
Salt	Amber

Product 6 – Sandwich

	Per 100g	**Per portion (180g)**
Fat	8.4g	15.2g
Saturates	1.8g	3.3g
Sugars	2.9g	5.2g
Salt	0.5g	0.9g

- As this is a food product, table 1 will be used to determine the signpost.

- The portion size of this product does not exceed 250g, therefore the per portion information does not need to be checked.

	Banding
Fat	Amber
Saturates	Amber
Sugars	Green
Salt	Amber