



Nutrition Criteria

White Paper

Contents

Executive Summary.....	3
EU Pledge Nutrition Criteria Overview	6
Section I: Background, approach and rationale.....	10
Introduction	10
Current practice	12
Development of common criteria.....	12
Overall approach.....	14
Scope and product categories	16
Reference units	17
Nutrients to limit.....	17
Components to encourage	18
Nutrient values.....	18
Next steps	19
Section II: Nutrition criteria by category.....	20
1. Vegetable and animal based oils, fats and fat containing spreads & emulsion-based sauces (e.g. mayonnaise).....	20
2. Fruits, vegetables and seeds, except oil	22
3. Meat based products	28
4. Fishery products.....	29
5. Dairy products.....	30
6. Cereal based products	33
7. Soups, composite dishes, main courses and filled sandwiches	37
8. Meals.....	39
9. Edible ices	43
References	44
Annex I: Energy values	47
Annex II: Key reference documents.....	49

Executive Summary

The EU Pledge is a voluntary initiative by leading companies to change food and beverage advertising to children under the age of twelve on TV, print and internet in the European Union. Member companies pledge not to advertise food and beverage products to children under twelve, or only to advertise those products that meet specific nutrition criteria.

Launched in 2007 as a commitment to the European Union Platform for Action on Diet, Physical Activity and Health, the EU Pledge has evolved significantly since entry into force on 1 January 2009, notably: the definition of “advertising to children” has been strengthened to cover programmes with 35% children under 12 or more in the audience, from the original 50%; the scope of the commitment has been extended to cover company-owned websites as well as third-party online advertising; membership has expanded from 11 companies representing two thirds of EU food and beverage advertising spend, to 21 companies representing an estimated 80% of ad spend in the EU.

These improvements respond to most of the suggestions for enhanced commitments reflected in the European Commission’s 2010 Implementation progress report on the EU Strategy on nutrition, overweight and obesity related health conditions. However, EU Pledge member companies are aware that the use of company-specific nutrition criteria, although science-based, poses potential problems of transparency and consistency. The EU Pledge therefore embarked on a project to develop common criteria, applicable only to those companies that currently use nutrition criteria – those eight member companies that do not to advertise any of their products at all to children under twelve will continue not doing so.

The EU Pledge nutrition criteria are designed for the exclusive purpose of defining better-for-you options in the context of food and beverage advertising to children under twelve and specifically for the product categories covered. This reflects international guidelines underlining the necessity to develop nutrient criteria that are tailored for a specific purpose. The use of the EU Pledge nutrition criteria for other purposes, such as for instance nutrition and health claims or taxation, would not be appropriate or scientifically credible.

The common EU Pledge nutrition criteria were developed on the basis of available international guidance and underpinned by some key principles agreed at the outset, including: a firm scientific basis; comprehensiveness; ability to make a difference; appropriateness in an EU-wide context; suitability for validation; and a clear and communicable rationale.

Different approaches to developing and applying nutrition criteria have been adopted across the globe. One approach is not necessarily better than another, but each system has specific advantages and disadvantages and all have inherent limitations. On the basis of a comprehensive discussion informed by the available evidence and guidance and underpinned by the above principles, the EU Pledge opted for a category-based approach, based on thresholds for key nutrients.

A category-based approach was selected because it is better able than a universal, across-the-board approach to reflect the role that different types of foods and beverages play in the average diet. It is also better at discriminating between food products within categories and therefore appropriate to further the core aim of the EU Pledge, i.e. to limit the types of food and beverage products that are advertised to children, while incentivising competition for the development of better-for-you options, through innovation and reformulation.

A threshold-based system was preferred to a scoring system since a key driver of common criteria was to enhance the consistency of existing company-specific criteria, most of which were based on threshold systems. Another factor in favour of a threshold-based system was increased transparency, a threshold system being more transparent and easier to communicate than a scoring system, whereby nutritional scores are worked out on the basis of an algorithm.

The common nutrition criteria are not intended as a universally applicable system. They cover nine defined categories produced or marketed by EU Pledge member companies. The choice of categories was motivated by the need to balance the need for simplicity and consistent treatment of similar products on the one hand and, on the other, the need to avoid categories so broad that only lax nutrition criteria would accommodate all types of products represented in a category. In order to ensure both robustness and fairness, it was necessary to create sub-categories within most of the nine categories.

No nutrition criteria were developed for certain categories, such as chocolate, confectionery and soft drinks. This reflects existing commitments by several member companies active in these categories and it confirms that none of the EU Pledge member companies will advertise these products to children under 12, as defined in the EU Pledge commitments.

Following implementation of the nutrition criteria in January 2015, it became apparent that a few products did not fall into a specific category because they did not meet the minimum content requirement under the relevant category/sub-category. The EU Pledge Nutrition Working Group agreed that in these cases, and if such a product cannot fall under any another category/sub-category, then the product cannot be marketed to children.

In light of experience with implementing the nutrition criteria in early 2015, it also became apparent that certain products that are produced by EU member companies but not relevant for children do not fall in any specific category. The EU Pledge Nutrition Working Group agreed that the following product categories should therefore be treated as outside the scope of the EU Pledge Nutrition Criteria:

- Bouillon/stock cubes
- Herbs and spices
- Coffee and tea (excluding coffee and tea-based drinks, which fall under the Beverages category)¹

The common nutrition criteria are based on a set of “nutrients to limit” and “components to encourage” (nutrients and food groups). A system taking into account both is more in line with the core objective of the EU Pledge – to foster innovation, reformulation and competition for a shift towards advertising of better-for-you products – than a system based solely on “nutrients to limit”.

The “nutrients to limit” - sodium, saturated fat and total sugars – were chosen on the basis of widely available evidence that they are of public health concern because population average intakes are in excess of those recommended or desirable for health. Importantly, and in contrast to a scoring system, in the EU Pledge nutrition criteria “components to encourage” do not counterbalance “nutrients to limit”: to be eligible for advertising to children under twelve, a product will need to contain the required quantity of “components to encourage”, *in addition to* being below the thresholds for “nutrients to limit”

¹ See footnote 6

and under the calorie cap set for each category. A specific rationale is outlined for the choice of energy caps and nutrient values in each category.

The common nutrition criteria are applicable since 1 January 2015. In line with the framework approach of the EU Pledge, whereby companies must meet a common benchmark but can go beyond if they wish, member companies may use different nutrition criteria than the common criteria, but on condition that they are demonstrably more stringent than the common ones.

The EU Pledge nutrition criteria should be seen against the backdrop of the great challenge of developing EU-wide criteria. It is clear that any nutrition criteria will have their advantages and drawbacks and all systems will have inherent limitations. However, EU Pledge member companies believe that these common criteria are an important step forward in terms of improved transparency and consistency. These criteria will also make a tangible difference in practice: for many of the companies that currently use nutrition criteria, the new criteria mean that significantly fewer products will be eligible for advertising to children under twelve than is currently the case.

Table 1: EU Pledge Nutrition Criteria Overview

Category 1: Vegetable and animal based oils, fats and fat containing spreads & emulsion-based sauces					
Sub-category A: Vegetable & animal based oils, fats & fat containing spreads: all animal and vegetable based fats & oils used as spreads on bread and/or food preparation. ²					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
Oils and fats (all types), full & low-fat margarine, butter mélanges, solid or liquid oil/fat products for roasting and frying	≤ 85	≤ 500	≤ 33% total fat is SAFA (incl. TFA)	(5)	≥ 25% of total fat is PUFA
Sub-category B: Emulsion-based sauces: sauces that constitute only a minor component of the meal to which an emulsifying agent is added OR have a fat content ≥ 10% w/w.					
Mayonnaise, salad dressings, marinades, vinaigrettes...	≤ 85	≤ 750	≤ 33% total fat is SAFA (incl. TFA)	≤ 5	≥ 25% of total fat is PUFA
Category 2: Fruits, vegetables and seeds, ³ except oil Vegetables include legumes and potatoes. Seeds include seeds, kernels, nuts. Nuts include peanuts and tree nuts.					
Sub-category A: Products of fruits and vegetables except oils & potatoes (≥ 50g fruit and/or veg per 100g of finished product) that constitute a substantial component of the meal.					
Vegetable gratin, canned vegetables, baked beans, fruit compote, fruit in syrup, fruit salad	≤170	≤ 300	≤ 1.5	≤ 15	Min. ½ portion fruit and/or veg. Nutrients delivered through ingredients (fruit and/or veg).
Subcategory B: Potato & potato products, except dehydrated potato products: all potato based dishes (≥ 50g potato per 100g of finished products) that constitute a substantial component of the meal.					
Mashed potato, gnocchi, gratin, dumplings, fried or roasted potato...	≤170	≤ 300	≤ 1.5	≤ 5	Nutrients delivered through main ingredient (potato)
Subcategory C: Potato chips & potato based snacks, incl. dough-based products					
Potato chips/crisps	≤170	≤670	≤10% kcal from SAFA	≤ 10	Fibre : ≥3g/100g/ml; and/or ≥70% UFA/total fat
Extruded & pelleted snacks, stackable chips	≤170	≤900	≤10% kcal from SAFA	≤10	Fibre : ≥3g/100g/ml; and/or ≥70% UFA/total fat
Sub-category D: Seeds and nuts					

² Butters as defined in Council regulation (EC) 1234/2007 Annex XV, are excluded from this category because they will not be advertised towards children.

³ Exemptions: 100% fruit and vegetables and their products, including 100% fruit and vegetable juices, as well as 100% nuts and seeds and mixes thereof (with no added salt, sugar or fat). These products, presented fresh, frozen, dried, or under any other form may be advertised to children without restrictions.

Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
Salted or flavoured nuts, mixed nuts, nut-fruit mixes, peanut butter	≤200	≤670	≤10	≤ 15	Nutrients delivered through ingredients (nuts and seeds)
Sub-category E: Fruit/Vegetable based meal sauces: all fruit/vegetable based sauces (≥ 50g fruit and/or vegetable per 100g of finished products) that constitute a substantial component of the meal					
Tomato sauce, pasta sauce...	≤ 100	≤ 500	≤ 1.5	≤ 10	Nutrients delivered through ingredients (fruits and/or vegetables)
Sub-category F: Fruit/Vegetable based condiments: all fruit/vegetable based condiments (≥ 50g fruit and/or vegetable per 100g of finished products) that constitute only a minor component of the meal					
Tomato ketchup, chutney...	≤ 85	≤ 750	≤ 1.5	≤ 25	Nutrients delivered through ingredients (fruit and/or vegetables)
Category 3: Meat based products: all kinds of processed meat/poultry, and meat products, consisting of minimally 50g of meat per 100g finished product					
Meatballs, salami, grilled ham, chicken fillet, sausages...	≤ 170	≤ 800	≤ 6	(≤ 5)	≥ 12% of energy as protein
Category 4: Fishery products: all kinds of processed fish, crustaceans and shellfish, consisting of min. 50g of fish, crustaceans, and/or molluscs per 100g of finished product					
Cod parings, fried fillet of haddock, fish fingers, pickled mussels, tinned tuna	≤ 170 OR > 170 IF ≥ 25% total fat is PUFA	≤ 450	≤ 33% total fat is SAFA (including TFA)	(≤5)	≥ 12% of energy as protein
Category 5: Dairy products					
Sub-category A: Dairy Products other than cheeses: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Milks & milk substitutes; yoghurts; sweet fresh/soft cheese; curd & quark; fermented milks; dairy desserts	≤170	≤ 300	≤ 2.6	≤ 13.5	Protein: ≥12 E% or ≥ 2g /100g or 100ml AND/OR At least 1 source of: Ca or Vit D or any Vit B
Sub-category B: Cheese and savoury dairy based products: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Hard, semi-hard cheeses	≤85	≤ 900 if SAFA ≤ 15 or ≤ 800 if SAFA ≤ 16	≤ 15 if sodium ≤ 900 or ≤ 16 if sodium ≤ 800	(< 5)	At least one source of: Ca, Vit B12, Vit B2

Other cheeses, curd & quark and savory dairy-based products	≤170	≤ 800	≤ 10	≤ 8	
Category 6: Cereal based products					
Sub-category A: <u>Sweet</u> biscuits, fine bakery wares and other cereal based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g, except when specified otherwise</i>					
All kinds of biscuits and cakes, cereal bars, flapjacks...	≤200	≤ 450	≤10	≤35	Fibre (≥3 g/100g) and/or whole grain (15% total ingredients) and/or 20%E from UFA and ≥70% UFA/total fat
Sub-category B: <u>Savoury</u> biscuits, fine bakery wares and other cereal based products, including dough-based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Savoury crackers, extruded, pelleted & popcorn-based snacks, popcorn, pretzel products	≤170	≤900	≤10% kcal from SAFA	≤10	Fibre : ≥3 g/100g; and/or ≥70% UFA/total fat
Sub-category C: Breakfast Cereals including porridge					
Ready to eat breakfast cereals such as cornflakes, puffed rice, porridge	≤210	≤450	≤5	≤30	Fibre (≥3g/100g) and/or wholegrain (15% whole grain per total ingredients)
Sub-category D: Cereal and cereal products except breakfast cereals, biscuits and fine bakery wares: cereal must be listed as the main ingredient.					
Bread, rusks, rice, noodles, pasta, polenta	≤340	≤500	≤5	≤5	Fibre (≥3 g/100 g) and/or wholegrain (15% of total ingredients)
Category 7: Soups, composite dishes, main course and filled sandwiches					
Sub-category A: Soups: all kinds of soups and broths containing min 1 of the following: 30g fruit, vegetables, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions).					
Tinned tomato soup, instant vegetable soup, soup in stand-up pouches	≤ 170	≤ 350	≤ 1.5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or vegetables, cereals, meat, fish, milk)
Sub-category B: Composite dishes, main dishes, and filled sandwiches: all kinds of dishes & sandwiches containing min 2 of the following: 30g fruit, veg, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions).					
Pasta salad with veg, noodles with sauce, pizza, croque-monsieur, moussaka, filled pancakes	≤ 425	≤ 400mg	≤ 5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or vegetables, cereals, meat, fish, milk)

Category 8: Meals: The combination of items served as a meal (main dish, side item (s) and a beverage) for breakfast, lunch or dinner.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*Energy values are per portion and nutrient values per 100g/100ml, except when specified otherwise</i>					
Children's meals	≤510/meal ^{a)} ≤340/meal ^{b)}	≤660/meal	≤10% kcal from saturated fat	≤20/meal (minus natural occurring sugar ^{c)} from 1 portion ^{d)} J/F/V/M/D)	Each meal must contain min. of: 1 portion ^{d)} fruit/ vegetables or/and 1 portion ^{d)} 100% juice or/and 1 portion qualified ^{d,e)} dairy product or milk or/and 1 portion ^{d)} of whole grain ^{f)}
Category 9: Edible ices: all kinds of edible ices (water ices and ice cream)					
Ice cream, water ice, ice lollies, sherbet ice	≤ 110	≤ 120	≤ 5	≤ 20	-
Exclusions (no nutrition criteria; are not advertised to children <12 by EU Pledge member companies)					
<ul style="list-style-type: none"> Sugar and sugar-based products, which include: Chocolate or chocolate products; Jam or marmalade; Sugar, honey or syrup; Non-chocolate confectionary or other sugar products⁴ Soft drinks⁵ 					

Notes:

a) For lunch/dinner (30% energy)

b) For breakfast (20% energy)

c) If sugar content is higher than 20g for a meal and contains more than 1 J/F/V/M/D.

d) Portions are:

- Fruits (F)/Vegetables (V): 60-80g
- 100% juice (J): 150-250ml
- Dairy (D): e.g. 30g cheese/100-150g yoghurt
- Milk (M): 150-250ml

e) Meet individual category requirements

f) Product qualified for a reasonable source of fiber which contains ≥ 8g whole grain

⁴ Sugar-free gum and sugar-free mints are exempted, i.e. outside the scope of EU Pledge restrictions.

⁵ The rationale for this exclusion is that some EU Pledge companies committed in 2006 not to market any soft drinks directly to children younger than 12 years old (see UNESDA commitments: <http://www.unesda.org/our-unesda-commitments-act-responsibly#year2006>). Discussions are ongoing regarding low-energy beverages. In the meantime companies that are not signatories to the UNESDA commitment will continue using their own nutrition criteria for these beverages, including fruit-based drinks. Bottled water is exempted from the EU Pledge restrictions.

Section I: Background, approach and rationale

Introduction

About the EU Pledge

The EU Pledge is a voluntary initiative by leading food and beverage companies to change food and beverage advertising to children under the age of twelve on TV, print and internet in the European Union.

The EU Pledge was launched in December 2007 as part of the signatories' commitment to the European Union Platform for Action on Diet, Physical Activity and Health, the multi-stakeholder forum set up by former EU Health and Consumer Affairs Commissioner Markos Kyprianou in 2005 to encourage stakeholders to take initiatives aimed at promoting healthy lifestyles in Europe. In the context of the EU Platform, the EU Pledge commitment is owned by the World Federation of Advertisers (WFA), which also supports the programme.

EU Pledge members

The founding members of the EU Pledge are the following companies: Burger King, Coca-Cola, Danone, Ferrero, General Mills, Kellogg, Kraft Foods, Mars, Nestlé, PepsiCo and Unilever.

In 2010, the European Snacks Association (ESA) and its leading corporate members joined the EU Pledge. Today, those are: Intersnack (including Estrella Maarud acquired in May 2014), KiMs (owned by Orkla Confectionery and Snacks), Lorenz Snack-World, Unichips San Carlo, Zweifel Pomy-Chips, Amica Chips and ICA Foods (which both joined in July 2014).

McDonald's joined the EU Pledge in November 2011, Royal FrieslandCampina in 2012, and the Quick Group in 2013, bringing membership to twenty-one leading food and beverage companies. Together, EU Pledge member companies account for over 80% of food and beverage advertising spend in the EU. The initiative is open to any food and beverage company active in Europe and willing to subscribe to the EU Pledge commitments.

The EU Pledge commitments

The EU Pledge is a framework initiative whereby signatories are committed to changing the way they advertise to children under 12 years old by respecting the following two criteria:

- **No advertising of products to children under 12 years, except for products which fulfil specific nutrition criteria based on accepted scientific evidence and/or applicable national and international dietary guidelines. For the purpose of this initiative, "advertising to children under 12 years" was defined as advertising to media audiences with a minimum of 35%⁶ of children under 12 years⁷.**

⁶ This is a commonly agreed benchmark. This method of audience indexing has been agreed as a pragmatic system to determine the applicability of advertising rules. Nevertheless, this is a minimum common benchmark for all EU Pledge member companies. For further detail see: www.eu-pledge.eu

⁷ The rationale for this threshold is the strong degree of academic consensus that by the age of 12 children develop their behaviour as consumers, effectively recognise advertising and are able to adopt critical attitudes towards it. Although children between the ages of 6 and 12 are believed to generally understand the persuasive intent of advertising, care

- **No communication related to products in primary schools, except where specifically requested by, or agreed with, the school administration for educational purposes.**

The EU Pledge is a dynamic and progressive initiative. While it provides a common framework, member companies can make commitments that go beyond it, and several do. Since its launch, over half of the founding member companies have increased their corporate commitments, tightening the way they define advertising to children, broadening the scope of their actions and strengthening the nutrition criteria they use to classify better-for-you options for children under 12 years.

In the same spirit and following constructive dialogue with stakeholders, the EU Pledge launched enhanced framework voluntary commitments, applying as of 1 January 2012 to existing and new members:

- **The audience threshold of children under 12 years was lowered from 50% to 35%**
- **In the online sphere, the above commitment *applies to marketing communications for food and beverage products on company-owned websites*, in addition to third-party internet advertising.**

These enhanced commitments are subject to third-party monitoring – as have been the original commitments - since their entry into force on 1 January 2012.

should be taken because they may not have a fully developed critical understanding. For further information see: http://www.wfanet.org/pdf/adv_papers/when_is_a_child_a_child.pdf

Current practice

To date there is no one single global or European set of nutritional guidelines to evaluate products on the basis of their nutrient content. There are however international and national recommendations for total diets (e.g. WHO 2003, Eurodiet 2001, Standing Nordic Committee on Food 2004, Conseil Supérieur d'Hygiène 2006). Such dietary guidelines usually include recommendations on daily caloric/nutritional intake. Alternatively many countries have food-based dietary guidelines to communicate healthy dietary choices in terms of food groups (e.g. AFSSA 2009, DGE 2005, HMM 2009, MFF 2009, MHH 2001, NNC 2005, SACN 2011, VIG 2009; see also WHO 2003 bis); however, these are not specific to individual foods. Existing guidelines are also rarely adapted to children's dietary intakes.

A number of EU Pledge companies⁸ have developed their own nutrition criteria for the purpose of distinguishing better-for-you options for children under 12 years. Such criteria have been developed on the basis of the most widely accepted national and international guidelines that exist (e.g. WHO, FAO, USDA, IOM, EURODIET). Companies that use nutrition guidelines to determine what they may choose to advertise to children have developed them individually, reflecting the diversity of their product portfolios. Some include products from a number of categories; others include only one category. Eight EU Pledge member companies⁹ have taken the decision not to advertise any of their products to children under 12, not on the basis of nutritional considerations, but because they direct their advertising primarily to the adults who make the household purchasing decisions and to young people older than 12 years.

Stakeholders have called on the EU Pledge initiative to enhance the transparency and consistency of the nutrition criteria applied by companies. This call is reflected in the European Commission's 2010 implementation progress report on the EU Strategy on Obesity, overweight and related health conditions (European Commission 2010), as well as the Commission's 2012 application report on the Audiovisual Media Services Directive (European Commission 2012).

Development of common criteria

Common nutrition criteria have been developed by EU Pledge members that use nutrition guidelines for advertising products to children to provide increased transparency and consistency and strengthen the commitments overall.

The common criteria developed by these EU Pledge members are designed for the exclusive purpose of defining better-for-you options in the context of food and beverage product advertising to children under the age of 12 and specifically for the product categories covered. This reflects international guidelines (e.g. EFSA 2008; WHO unpublished) underlining the necessity to develop nutrient criteria that are tailored for a specific purpose.

Such criteria are applied only by EU Pledge members who choose to advertise the compliant products also to children under 12. Companies that wish to use different nutrition criteria may continue to do so, provided they can demonstrate that these are more stringent than the EU Pledge common nutrition criteria. In such cases, the EU Pledge will commission an independent nutrition

⁸ Burger King, Danone, Friesland Campina, General Mills, Kellogg's, Intersnack, McDonald's, Mondelez, Nestlé, PepsiCo, Unichips San-Carlo, the Quick Group, Unilever

⁹ Amica Chips, Coca-Cola, Ica Foods, KiMs, Lorenz Snack-World, Ferrero, Mars, Zweifel Pomy-Chip

expert to verify that this is the case, on the basis of the impact of the criteria on the eligibility of those products for advertising to children under 12.

The effort of the EU Pledge in this area should be seen against the backdrop of the great challenge of developing common criteria in the diverse countries that make up Europe. As underlined by EFSA, *“the lack of uniform data for food composition and food consumption across the EU, as well as differences in nutrient intake recommendations and food based dietary guidelines between Member States, makes it more difficult to set nutrient profiles at EU level than at national level”* (EFSA 2008).

Against this background it is clear that any nutrition criteria will have their advantages and drawbacks and all systems will have inherent limitations. Such limitations common to different schemes include, according to EFSA:

- The difficulty in reflecting differences in national nutrient intake recommendations and food based dietary guidelines in an EU system.
- The difficulty in *“seeking to apply to individual food products nutrient intake recommendations that are established for the overall diet”*.
- The inability of nutrient criteria to *“take into account changes in nutrient content that occur during cooking or preparation, such as addition of fat, sugar or salt”* as well as *“the habitual intake of the food or the pattern of consumption”*. (EFSA 2008)

The present nutrition criteria were designed for the specific and exclusive purpose of food advertising to children under 12; their use for other purposes, such as, for instance, for nutrition and health claims or taxation, would not be appropriate or scientifically credible.

Development process

The EU Pledge Working Group on Nutrition Criteria was established following discussions in the course of 2011 with the European Commission and stakeholders in the context of the EU Platform for Action on Diet, Physical Activity and Health.

The Working Group, established in late 2011, drew on member companies’ internal expertise, by gathering a senior nutritionist from each member company. The Working Group established terms of reference aimed at developing a consensual approach to common nutrition criteria.

In a first phase, the Working Group discussed how it would approach establishing a suitable process for developing common nutrition criteria. In this respect it relied to a significant extent on the draft WHO Guidance on the establishment of nutrient profiles (WHO unpublished).

Second, the Working Group reviewed the available evidence and existing standards that could provide a useful benchmark (See Annex II, Reference documents).

Third, the Working Group discussed and agreed on an overall conceptual approach that it deemed suitable for the purpose in hand, having weighed up the benefits and drawbacks of different approaches.

Fourth, the Working Group discussed and agreed core parameters (scope, food categories, reference values, thresholds vs. scoring).

Fifth, the Working Group set about agreeing specific values and, in the process, refined the key parameters where needed.

Finally, the resulting draft common nutrition criteria were subjected to a preliminary validation process, involving benchmarking against indicator foods and against member companies' product portfolios; in a second stage they will also be reviewed against a wider European food consumption database (Roodenburg et al. 2011 bis).

Overall approach

The EU Pledge Nutrition Working Group took on board the key points of the EFSA Opinion (EFSA 2008), namely the need to take into account:

- Dietary recommendations, public health considerations and generally accepted scientific evidence on the relationship between diet, nutrition and health;
- Other considerations of an industrial/commercial, cultural and dietary/culinary nature;
- The variability of dietary habits and traditions and the fact that dietary changes take time;
- The ability of the system to permit product innovation.

Based on this guidance, the EU Pledge Working Group developed some key principles to underpin its work, namely that the criteria would be:

- **Scientifically grounded:** i.e. backed up by an articulated and up-to-date science-based analysis of state of the art evidence wherever possible.
- **Comprehensive:** i.e. applicable to all products in defined categories (see table on Nutrition criteria overview), unless exemptions are justified (a) scientifically, (b) by the fact that such categories/products are not currently marketed to children under 12 at all.
- **Progressive:** i.e. able to foster progress vis-à-vis existing company specific criteria and able to encourage product innovation and reformulation.
- **Appropriate:** i.e. suitable for the European context and compatible with standards developed elsewhere.
- **Validated:** i.e. amenable to a validation process ensuring quality and legitimacy (specifics to be determined at a later stage).
- **Communicable:** i.e. with a clear rationale and relatively straight-forward to communicate externally to lay audiences.

Different approaches to developing and applying nutrition criteria have been adopted across the globe. One approach is not necessarily better than another on the basis of the above criteria. However, each system has specific advantages and disadvantages and, as noted above, all have inherent limitations.¹⁰

On the basis of a comprehensive discussion informed by the available evidence and guidance¹¹ and underpinned by the above principles, the EU Pledge Working Group decided to favour a category-based approach, based on thresholds for key nutrients, on the basis of the following main considerations:

¹⁰ For a detailed discussion, see EFSA 2008.

¹¹ See Annex II for a list of key reference documents used.

Category based approach

- A category-based approach is able to take into account the role that different types of food and beverage products play in the average diet, whereas this is significantly more difficult to achieve in an “across the board” or universal approach (EFSA 2008).
- A category-based approach works better to discriminate between food products within categories. It is therefore better suited than a universal system to further the core aim of the EU Pledge, namely to limit the types of food and beverage products that are advertised to children, while incentivising competition for the development of better-for-you options, through innovation and reformulation.

Threshold-based approach

- As recommended by EFSA, the choice between threshold-based and scoring models should be guided by pragmatic considerations related to the specific needs of the system.¹²
- On this basis, the EU Pledge Working Group considered that a threshold-based system would be more appropriate, since:
 - A key driver of establishing common nutrition criteria was to enhance the consistency of existing company-specific criteria, most of which were based on threshold systems;
 - Another key driver was increased transparency, and a threshold system is more transparent and easier to communicate to stakeholders and to the consumer than a scoring system, whereby nutritional scores are worked out on the basis of an algorithm.

¹² *“The Panel recommends that the choice of threshold or scoring system should be based on pragmatic considerations related to the needs of the particular scheme, while threshold or score values should be selected to ensure the appropriate classification of food products”* (EFSA 2008)

Scope and product categories

In defining product categories, the Working Group was guided by the following principles:

- The common nutrition criteria are not intended as a universally applicable system. They should cover defined categories produced or marketed by EU Pledge member companies, other than those categories produced but not advertised to children under member companies' corporate commitments.
- The number of categories should be limited as much as possible with a view to ensuring consistent treatment of similar products, as well as maintaining as much simplicity as possible.
- At the same time, the number of categories should not be limited to an extent where categories could be so broad as to require less stringent values in order to accommodate all types of products represented in the category.

On this basis and at this stage, the following nine categories were developed and agreed:

1. **Vegetable oils, butter and spreadable fats & emulsion-based sauces (e.g. mayonnaise)**
2. **Fruits, vegetables¹³ and seeds¹⁴ and their products except oil**
3. **Meat based products**
4. **Fishery products**
5. **Dairy products**
6. **Cereal based products**
7. **Soups, composite dishes, main courses and filled sandwiches**
8. **Meals**
9. **Edible ices**

It became clear that in order to ensure both robustness and fairness, it would be necessary to create sub-categories within most of the above categories. These are detailed in Section II below.

In order to ensure that products would fit appropriately into one of the above categories, each category was defined on the basis of minimum content of the food group in question (e.g. min. 50g meat/100g). In a couple of cases, the definition was based on "main ingredient" considerations instead. This is to account for the fact that in some categories it is common to have products that contain significant percentages of more than one food group without reaching a minimum threshold for either category (e.g. some cereal products). In order to fit into the most appropriate category, the "main ingredient" criterion is more suitable in these cases.

No nutrition criteria were developed for the following categories that are not advertised to children under 12 by EU Pledge member companies:

- Sugar and sugar-based products, which include:
 - Chocolate or chocolate products
 - Jam or marmalade
 - Non-chocolate confectionery or other sugar products¹⁵

¹³ Vegetables include legumes as well as potatoes.

¹⁴ Seeds include seeds, kernels and nuts. Nuts include peanuts and tree nuts.

- Sugar, honey or syrup
- Soft drinks¹⁶

This reflects existing commitments by several member companies active in these categories and it confirms that none of the EU Pledge member companies will advertise these products to children under 12, as defined in the EU Pledge commitments.

Reference units

As recommended by EFSA, the EU Pledge Working Group based its selection of reference units on pragmatic considerations related to the needs of the particular scheme in question (EFSA 2008).

The objective of the present scheme is to differentiate between products within categories – products which are invariably pre-packed and promoted and sold in specific portion sizes or with serving size instructions. On this basis, it was agreed that the reference unit for the first key discriminating criterion, i.e. energy, should be “per portion”¹⁷. This would ensure that the absolute energy value of a product would need to be below a specific cap to be eligible for advertising to children under 12.

With regard to key nutrients, it was agreed that the reference unit would be “per 100g/ml”¹⁸. This is because:

- Standardised reference portion sizes do not exist for all product categories in Europe.
- The nutrient values per 100g/ml can easily be translated into values per portion where standard reference portions exist.

Nutrients to limit

With regard to “nutrients to limit”, the EU Pledge Working Group reviewed the available evidence (see Annex II), with the following EFSA recommendation as a guiding principle: “*the virtues of nutrient profiles based on a large number of nutrients should be weighed against the burden that such complexity would constitute*” (EFSA 2008).

The pragmatic decision taken by the Working Group was to focus on those nutrients that are most widely considered of public health concern (WHO 2004) – not because inherently problematic – but because population average intakes are in excess of those recommended or desirable for health. In addition to energy, the “nutrients to limit” chosen were:

- Sodium

¹⁵ Sugar-free gum and sugar-free mints are exempted, i.e. outside the scope of EU Pledge restrictions.

¹⁶ The rationale for this exclusion is that currently some EU Pledge companies committed in 2006 not to market any soft drinks directly to children younger than 12 years old (see UNESDA commitments: <http://www.unesda.org/our-unesda-commitments-act-responsibly#year2006>). Discussions are ongoing regarding low-energy beverages. In the meantime companies that are not signatories to the UNESDA commitment will continue using their own nutrition criteria for these beverages, including fruit-based drinks. Bottled water is exempted from the EU Pledge restrictions.

¹⁷ Some exceptions to this rule were however needed, e.g. in the case of quick service restaurant meals, where the reference value is “per meal”, as these are marketed as such, i.e. as a combination of main dish, side dish, dessert and drink.

¹⁸ As above. An additional exception was needed in the case of saturated fats in some categories: where fat is a dominant nutrient in the product, what matters more nutritionally is the proportion of saturated fat to total fat, rather than the total amount of saturated fat per 100g.

- Saturated fat
- Total sugars

The sodium values given can be converted into salt values by applying the standard conversion formula: salt value = 2.5 x sodium value.

With regard to fat, the decision to focus mainly on saturated fats was taken on the basis of:

- The consideration that total fat content is already limited by an energy cap.
- The fact that saturated fat, not fat overall, is consumed in amounts that exceed those that are recommended for health.
- The understanding that trans-fatty acids have been reduced to minimal levels for most of the food groups in the European food supply in recent years, to the point where they are no longer of significant relevance as a “nutrient to limit” (EFSA 2008).

Components to encourage

The EU Pledge Working Group agreed that a system taking into account both “nutrients to limit” and “components to encourage” (nutrients and food groups) is more in line with the core objective of the EU Pledge – to foster innovation, reformulation and competition for a shift towards advertising of better-for-you products – than a system based solely on “nutrients to limit”.

The choice of “components to encourage” was made on a category basis, i.e. pinpointing those positive components most relevant in each category, e.g. fibre and wholegrain in cereal-based products; protein and calcium in dairy products; protein in meat and fishery products; polyunsaturated fatty acids (PUFAs) in vegetable oils, spreads and fats, etc.

In addition, it was decided to only allow the addition of vitamins and minerals (fortification) to qualify as “components to encourage” in specific food categories where such fortification is most strongly encouraged on public health grounds (e.g. vitamin D in dairy products). In all other cases, only naturally occurring “components to encourage” qualify.

Importantly, and in contrast to a scoring system, in the EU Pledge common nutrition criteria, “components to encourage” do not counterbalance “nutrients to limit”. Where they are listed in the criteria, the specified quantity needs to be present in the product *in addition to* the product meeting the criteria for “nutrients to limit”.

Nutrient values

All values referring to energy, “nutrients to limit” and “components to encourage” in the EU Pledge common nutrition criteria apply to food products as sold, except where specified, for those products which cannot be consumed without reconstitution (e.g. soup powder, dehydrated mashed potatoes, milk drinks etc.).

The values for each nutrient in each category are based on:

- International dietary guidelines referring to nutrient intake (e.g. WHO).
- The contribution of different foods to children’s overall diet, on the basis of average consumption.

- The overall importance of specific nutrients in food products within each category, i.e. benchmarking of what are higher or lower end percentages.
- Technological feasibility and consumer acceptance.

With regards to energy values, these are calculated as a percentage of reference intake values. It is important to note that quantitative guidelines for children are not numerous. Nutritional needs for children below 12 are not always adequately researched, especially when they are not clearly linked to a risk of obesity and chronic diseases. Currently there are no officially approved or EU-endorsed daily reference values for children available in Europe. We therefore based our approach on existing reference intake values in the US and some European countries (See Annex I). We found that reference intakes for 4 to 10 year olds ranged from about 1400kcal to over 2050 kcal so the chosen value of 1700 kcal/day for children up to 12 years of age is conservative but justifiably so in light of the overall public policy objective of tackling childhood obesity.

Food intake during the day is usually divided across: breakfast, lunch, evening meal and food consumed between meals (snacks). As a wider range of foods is customarily consumed at lunch and dinner compared to breakfast, these are conventionally assigned a greater proportion of intake: 20% of daily energy intake at breakfast; 30% for lunch; 30% for dinner; and 20% for snacks (Food Standards Agency 2007). Given that children customarily consume five meals per day, including two snacks, each of these snacking occasions can account for 10% of energy intake, or 170 kcal on the basis of the daily reference energy intake of 1700 kcal described above. On the basis of the same rationale, the average child's breakfast energy intake reference value was set at 340 kcal, while lunch and the evening meal can account for kcal 510 respectively. Energy caps for foods consumed as part of a meal have been set as a share of the energy reference value of the meal in question, taking into account the customary contribution of the particular product to the eating occasion, e.g. breakfast cereals as part of a complete breakfast; main dishes as part of a complete lunch or dinner.

Specific additional rationales for individual values are given in the category sections in Section II below.

Next steps

The above EU Pledge Common Nutrition Criteria entered into force across the EU for all EU Pledge member companies that advertise food and beverage products to children on 1 January 2015.

Member companies who can demonstrate that their current nutritional criteria are stricter than the common criteria may continue using their own criteria.

EU Pledge member companies that do not advertise any of their products to children under 12 at all have decided to maintain their policies. Therefore, the common nutrition criteria are not relevant for them.

In line with WHO recommendations, the nutrition criteria should be amenable to adaptation in light of new developments. These Common Nutrition Criteria may therefore be updated in the future, potentially also to include food categories that are not represented currently.

Should existing or future EU Pledge member companies wish to develop criteria for new food categories, i.e. categories not currently represented in these common nutrition criteria, they will need to do so jointly within the EU Pledge initiative and in line with the common approach.

Section II: Nutrition criteria by category

1. Vegetable and animal based oils, fats and fat containing spreads & emulsion-based sauces (e.g. mayonnaise)

Category 1: Vegetable and animal based oils, fats and fat containing spreads & emulsion-based sauces					
Sub-category A: Vegetable and animal based oils, fats and fat containing spreads: all animal and vegetable based fats and oils used as spreads on bread and/or the preparation of food ¹⁹ .					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Oils and fats (all types), low-fat margarine, margarine, butter mélanges, oil/fat products for roasting and frying (solid or liquid)...	≤ 85	≤ 500	≤ 33% total fat is SAFA (incl. TFA)	(≤ 5)	≥ 25% of total fat is PUFA
Sub-category B: Emulsion-based sauces: sauces that constitute only a minor component of the meal to which an emulsifying agent is added OR have a fat content ≥ 10% w/w.					
Mayonnaise, salad dressings, marinades, vinaigrettes...	≤ 85	≤ 750	≤ 33% total fat is SAFA (incl. TFA)	≤ 5	≥ 25% of total fat is PUFA

- **Product group:**
 - **Sub-category A:** The product group includes all animal and vegetable based fats and oils used as spreads on bread and/or the preparation of food¹. Examples are oils and fats (all types), low-fat margarine, margarine, butter mélanges, oil/fat products for roasting and frying (solid or liquid).
 - **Sub-category B:** The product group includes sauces that constitute only a minor component of the meal, to which an emulsifying agent is added OR have a fat content ≥ 10% w/w. Examples are mayonnaise, salad dressings, marinades, and vinaigrettes.
- **Energy:** The threshold (85kcal) is equivalent to 5% of children's daily reference value (1700kcal) per portion. The reference portions are 10g for spreads and 15ml/14g for most emulsion-based sauces. Application of this energy threshold only allows low-fat emulsion-based sauces (e.g. low-fat mayonnaise) to comply.
- **Sodium:**
 - **Sub-category A:** Within Europe salt content in spreadable fats differs substantially. The level of 500mg/100g is challenging for products in e.g. UK (UK Responsibility Deal 2012)

¹⁹ Butters as defined in Council regulation (EC) 1234/2007 Annex XV, are excluded from this category because they will not be advertised towards children.

targets for fat containing spreads vary from 40mg [unsalted] to 800mg). As portion sizes for this product group are relatively small, sodium contribution is relatively low (50mg/portion).

- **Sub-category B:** A relatively higher sodium level is necessary for preservation in this sub-category (microbes grow in water, not in fat; microbes do not grow in water with some sodium; products with higher water content, such as low-fat mayonnaise, therefore need higher sodium to prevent spoilage²⁰), and thus not to penalize reduced-fat products. Criterion is the same as applied in the International Choices Programme (Roodenburg et al. 2011) and corresponds to the UK Responsibility Deal 2012 target for reduced fat mayonnaise. As portion sizes for this product group are relatively small, sodium contribution is relatively low (~105mg/portion).
- **Saturated fats:** For these product groups, consisting of relatively high-fat products, application of the reference amount “% of total fat” is more relevant than “g/100g”. Indeed, there is scientific consensus that reducing SAFA per se is not beneficial for heart health but what matters is what SAFA are replaced by. In this product group, for both high and low fat levels, it is appropriate to replace SAFA by PUFA. Therefore, expression of SAFA as “% of total fat” better identifies healthier options within the product group, which are not necessarily products with a low SAFA content. The “g/100g” reference would also not provide an incentive for relatively low fat products to reformulate. Trans-fatty acids (TFAs) are included in the saturated fat threshold, due to their public health relevance in this group. The SAFA threshold (33% of total fat) resembles the fatty acid profile of the healthier oils and fats and will exclude virtually all animal based products. Also the majority of stick margarines will be excluded.
- **Total sugars:** For Subcategory A, sugars are not considered to be relevant. Nonetheless, the EU value for “low in sugar” as per Regulation EC 1924/2006 (5g/100g) is applied. The same value is applied to Subcategory B, where it is a challenging threshold for reduced-fat sauces.
- **Components to encourage:** The products in this category are sources of poly-unsaturated fatty acids (PUFAs) (WHO 2003). PUFAs are widely acknowledged as nutrients making a positive contribution to the diet and for which the average consumption among the European population is inadequate (Harika et al. 2011). As the evidence for PUFAs is stronger than for mono-unsaturated fatty acids (MUFAs) (Mozaffarian et al. 2010) the latter are not included.

What’s in and what’s out?

- *The energy threshold will allow reduced-fat sauces (e.g. low-fat mayonnaise) to comply but exclude full-fat varieties.*
- *The saturated fat criterion will exclude animal fat-based products, as well as stick margarines.*
- *The sugar threshold is challenging for reduced-fat sauces.*

²⁰ Note that products in this category, in contrast to the other sub-category, are mainly ambient stable.

2. Fruits, vegetables and seeds, except oil

Category 2: Fruits, vegetables and seeds, ²¹ except oil Vegetables include legumes and potatoes. Seeds include seeds, kernels, nuts. Nuts include peanuts and tree nuts.					
Sub-category A: Products of fruits and vegetables except oils & potatoes (≥ 50 g fruit and/or vegetable per 100g of finished products ²²) that constitute a substantial component of the meal.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Vegetable gratin, ratatouille, canned vegetables, baked beans, fruit compote, fruit in syrup, fruit salad...	≤ 170	≤ 300	≤ 1.5	≤ 15	Min. $\frac{1}{2}$ portion of fruit and/or vegetables. Components to encourage delivered through ingredients (fruits and/or vegetables)

- **Product group:** The product group includes all fruit/vegetable based dishes (≥ 50 g fruit and/or vegetable per 100g of finished products) that constitute a substantial component of the meal.
- **Energy:** The threshold (170kcal/portion) represents 10% of children’s daily reference value (1700kcal) per portion. A typical fruit or vegetable children’s portion corresponds to 80g.
- **Sodium:** The sodium value of 300mg/100g corresponds to the UK 2012 Responsibility Deal target for bakes beans, quiches and flans.
- **Saturated fats:** The threshold (1.5g/100g) corresponds with “Low in saturated fat”, as defined in Regulation (EC) 1924/2006 on nutrition and health claims made on foods.
- **Total sugars:** The total sugar value is mainly related to fruit content. The threshold is set at 15 grams/100g, which excludes preparations made solely with fruit with naturally high sugar content (e.g. grape 16g/100g).
- **Components to encourage:** These are based on the WHO dietary recommendation of ≥ 400 g per day of fruits and vegetables (WHO 2003). Campaigns generally advise people to eat five portions of fruit and vegetables daily (5x 80g fresh fruit or vegetables = total 400g), adopting the well-known simple message of ‘5 A DAY’, initiated in the US and extended to several countries in Europe (WHO 2003 bis, WHO 2005, EUFIC 2012). Positive nutrients are delivered through the main ingredients of the fruit and vegetable preparation, as only products that contain ≥ 50 g of fruits and vegetables per 100g of product qualify for this product group. One portion corresponds to 80g fresh fruit or vegetables (or equivalent in non-fresh format).

What’s in and what’s out?

- *The energy threshold will ensure that various fried, creamy, or cheese preparations will not*

²¹ Exemptions: 100% fruit and vegetables and their products, including 100% fruit and vegetable juices, as well as 100% nuts and seeds and mixes thereof (with no added salt, sugar or fat). These products, presented fresh, frozen, dried, or under any other form may be advertised to children without restrictions.

²² Local standards should apply for the purposes of quantifying fruit and vegetable content, e.g. conversion formulae for dried fruit and vegetables into fresh equivalents.

qualify.

- The saturated fat threshold is challenging for e.g. cheese, cream, or meat containing products.
- The sugar cap will be challenging for preparations such as fruit compote, as they may contain about 17g of sugars, of which 11g are coming from fruit. This threshold still allows some product innovations with high fruit content.

Category 2: Fruits, vegetables and seeds, except oil

Subcategory B: Potato & potato products, except dehydrated potato snack products: all potato based dishes ($\geq 50g$ potato per 100g of finished products) that constitute a substantial component of the meal.

Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Mashed potato, potato gnocchi, gratin, potato dumplings, fried or roasted potato...	≤ 170	≤ 300	≤ 1.5	≤ 5	Nutrients delivered through main ingredient (potato)

- **Product group:** The product group includes all potato based dishes ($\geq 50g$ potato per 100g of finished products) that constitute a substantial component of a meal. The minimum quantity required should be calculated on the basis of the ingredients entering into the recipe.
- **Energy:** The threshold (170kcal/portion) represents 10% of children’s daily reference value (1700kcal) per portion. This energy threshold will ensure that fried potato and potato preparations with e.g. high content of cream and/or cheese do not qualify. Depending on the preparation, a typical child’s potato portion ranges from 80g (e.g. croquettes) to 180g (e.g. jacket potato or mashed potato).
- **Sodium:** The sodium value of 300mg/100g corresponds to the UK 2012 Responsibility Deal target for potato products.
- **Saturated fats:** The threshold (1.5g/100g) corresponds with “Low in saturated fat”, as defined in Regulation (EC) 1924/2006 on nutrition and health claims made on foods.
- **Total sugars:** the threshold (5g/100g) corresponds with “Low in sugars”, as defined in Regulation (EC) 1924/2006 on nutrition and health claims made on foods. This amount allows products prepared with milk to comply.
- **Components to encourage:** Positive nutrients are delivered through the main ingredient of the preparation, as only products that contain $\geq 50g$ of potato per 100g of product qualify for this product group.

What’s in and what’s out?

- The energy threshold will exclude most fried potato and potato preparations with e.g. high content of cream and/or cheese
- The saturated fat threshold is challenging for e.g. cheese or cream containing products as well as fried potato products.

Category 2: Fruits, vegetables and seeds, except oil					
Subcategory C: Potato chips & potato based snacks, incl. dough-based products:					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Potato based snacks(incl. dough based products)					
Potato chips/crisps	≤170	≤ 670	≤ 10% kcal from SAFA	≤ 10	Fibre: ≥3 g/100g; and/or ≥70% UFA/total fat
Extruded snacks, pelleted snacks, stackable chips	≤ 170	≤ 900	≤ 10% kcal from SAFA	≤ 10	Fibre: ≥3 g/100g; and/or ≥70% UFA/total fat

- **Product group:** The product group includes potato chips and other potato-based snacks. The reference portion is 30g.
- **Energy:** The threshold (170kcal/portion) represents 10% of children’s daily reference value (1700kcal) per portion.
- **Sodium:** The sodium value for potato chips (200mg/portion) is based on 10% children’s reference value for 7-10 year olds of 5g salt or 2000mg sodium per day (SACN 2003). The threshold for potato-based snacks is based on UK Responsibility Deal 2012 targets, which take into account the functional role of sodium in such products.
- **Saturated fats:** The saturated fat threshold (10% Kcal from SAF) is consistent with international dietary guidelines for saturated fat intake.
- **Total sugars:** For fried and baked products this level of sugars is consistent with the international consensus that ≤10% energy should be derived from added sugars. Sugars are not discriminatory for this category; levels are usually low and are associated with seasoning applications.
- **Components to encourage:** The 3g/100 fibre is equivalent to the legal requirement for the “source of fibre claim” under the EU Nutrition and Health Claims Regulation and represents a significant amount. The value for unsaturated fatty acids (UFA) – min. 70% unsaturated fatty acids as a proportion of total fat - is equivalent to the value required for the “high unsaturated fat” claim under the EU Nutrition and Health Claim Regulation.

What’s in and what’s out?

- *The sodium thresholds are challenging and ensure that only products reformulated to have a smaller number or amounts of sodium containing ingredients and reduced topical application of salt can be compliant.*
- *The saturated fat threshold ensures that healthier oils with a reduced level of saturated fat have to be employed.*

Category 2: Fruits, vegetables and seeds, except oil					
Sub-category D: Seeds and nuts					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Salted or flavoured nuts (e.g. Peanuts, hazelnuts, cashew nuts, pistachios, almonds, walnuts), mixed nuts, nut-fruit mixes, peanut butter...	≤ 200	≤ 670	≤ 10	≤ 15	Nutrients delivered through ingredients (nuts and seeds)

- **Product group:** The product group includes all seeds and nuts as well as coated nuts, excluding 100% seeds and nuts, i.e. without added salt, fat or sugar, which are exempted.
- **Energy:** The relatively high energy cap is a reflection of the high nutrient density of these energy dense products. As well as being high in good fats, delivering calories, nuts are also an important source of a variety of micronutrients and other plant components thought to be beneficial for health. As such, nuts can have an important role to play in the diet.
- **Sodium:** The sodium threshold corresponds to 10% of a 7-10 year old child's reference daily intake value of 5g salt (2000mg sodium) (SACN 2003).
- **Saturated fats:** The criterion for saturated fat will exclude both nuts which are naturally higher in saturated fats but also those which have been fried in oils which are higher in saturated fat.
- **Total sugars:** The sugars criterion reflects the inclusion of dried fruit in fruit/nut mixes but will prohibit the use of thick sugary coatings on nuts.
- **Components to encourage:** Positive nutrients are delivered through the main ingredient (nuts, seeds), which are a natural source of micronutrients.

What's in and what's out?

- *The criteria are designed to limit the inclusion of nut products whose nutrient composition has been adversely impacted by the addition of fat or sugar through frying, coating or inclusions.*

Category 2: Fruits, vegetables and seeds, except oil					
Sub-category E: Fruit/Vegetable based meal sauces: all fruit/vegetable based sauces (≥ 50 g fruit and/or vegetable per 100g of finished products ²³) that constitute a substantial component of the meal					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Tomato sauce, pasta sauce...	≤ 100	≤ 500	≤ 1.5	≤ 10	Nutrients delivered through ingredients (fruits and/or vegetables)

- **Product group:** The product group includes all fruit/vegetable based sauces (≥ 50 g fruit and/or vegetable per 100g of finished products) that constitute a substantial component of the meal.
- **Energy:** The threshold (100kcal/portion) is the same as applied in the International Choices Programme (Roodenburg et al. 2011). This value represents $\sim 6\%$ of children’s daily reference value (1700kcal) per portion (reference portion: 100ml).
- **Sodium:** Meal sauces are normally added to unflavoured carbohydrates and vegetables acting as the main meal flavour provider. These products are consumed in smaller portions than soups (100ml vs. 200ml), for which a 350mg sodium value is defined. The sodium threshold (500mg) is challenging for various sauces.
- **Saturated fats:** The threshold (1.5g) corresponds with “Low in saturated fat”, as defined in Regulation (EC) 1924/2006 on nutrition and health claims made on foods.
- **Total sugars:** The total sugar value is related to the fruit/vegetable content, as only meal sauces consisting of $>50\%$ fruits and/or vegetables are included in this product group. The threshold is set at 10 g to allow sauces prepared from high sugar containing vegetables (e.g. beet root, sweet pepper, corn, tomato) to comply, and to stimulate (and not penalize) innovations towards high vegetable content sauces.
- **Components to encourage:** Positive nutrients are delivered through the main ingredients of the meal sauces, as only these sauces that contain ≥ 50 g of fruits and vegetables per 100g product are classified in this product group.

What’s in and what’s out?

- *The energy and nutrient limits will exclude a number of cream, cheese and meat-containing sauces.*

²³ See footnote 22

Category 2: Fruits, vegetables and seeds, except oil					
Sub-category F: Fruit/Vegetable based condiments: all fruit/vegetable based condiments (≥ 50 g fruit and/or vegetable per 100g of finished products ²⁴) that constitute only a minor component of the meal.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Tomato ketchup, chutney...	≤ 85	≤ 750	≤ 1.5	≤ 25	Nutrients delivered through ingredients (fruit and/or vegetables)

- **Product group:** All fruit/vegetable based condiments (≥ 50 g fruit and/or vegetable per 100g of finished products) that constitute only a minor component of the meal.
- **Energy:** The threshold (85kcal) is equivalent to 5% of children’s daily reference value (1700kcal) per portion.
- **Sodium:** The sodium threshold is the same as applied in the International Choices Programme (Roodenburg et al. 2011) and is close to the relatively stringent UK Responsibility Deal 2012 target for ketchups (730mg). A relatively higher sodium level is set for this product group (compared to vegetable based meal sauces): as portion sizes for this product group are relatively small (15ml, 14g), sodium contribution is relatively low (~105mg/portion).
- **Saturated fats:** The threshold (1.5g) corresponds with “Low in saturated fat”, as defined in Regulation (EC) 1924/2006 on nutrition and health claims made on foods.
- **Total sugars:** The total sugar value is related to the fruit/vegetable content, as only condiments consisting of $>50\%$ fruits and/or vegetables are included in this product group. Higher sugar levels are expected in these products due to concentration: ingredients are reduced in cooking (e.g. chutneys). Therefore, a relatively higher sugar level is set for this product group (compared to vegetable based meal sauces). As portion sizes for this product group are relatively small, sugar contribution is relatively low (3.5g/portion).
- **Components to encourage:** Positive nutrients are delivered through the main ingredients of condiments, as only these condiments that contain ≥ 50 g of fruits and vegetables per 100g product are classified in this product group.

What’s in and what’s out?

- *The sodium threshold is challenging for various ketchups and savoury condiments.*

²⁴ See footnote 22

3. Meat based products

Category 3: Meat based products: all kinds of processed meat/poultry, and meat products, consisting of minimally 50g of meat per 100g finished product					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Ready-to-eat meatballs, salami, smoked beef, grilled ham, chicken fillet, sausages...	≤ 170	≤ 800	≤ 6g	(≤ 5)	≥ 12% of energy as protein

- **Product group:** The product group includes all kinds of processed meat/poultry, and meat products, consisting of minimally 50g of meat per 100g finished product (fresh meat as defined in Annex I of [Regulation \(EC\) No 853/2004](#) is exempted). Note that it also includes ready dishes where meat is the main ingredient (>50%) such as “Blanquette de veau” or “Fricassée de volaille”.
- **Energy:** The threshold (170kcal) is equivalent to 10% of children’s daily reference value (1700kcal), which represents up to 1/3 of the energy content of a meal (510kcal). Various recommendations for schools menus indicate children’s portion sizes ranging from 45 to 125g, depending on product type and children’s age. This threshold is challenging for various meat products.
- **Sodium:** Salt (sodium) is necessary for meat preservation. The 800mg threshold, which is more stringent than the criterion as applied in the International Choices Programme (Roodenburg et al. 2011) (900mg).
- **Saturated fats:** In combination with the energy criterion, the SAFA threshold is a challenging cut-off. Meat is a natural source of fat and saturated fat (with SAFA levels up to 50% of total fat) Application of the saturated fat criterion will exclude meat products with a fat content >12%. **Total sugars:** For this product group, sugars are not considered to be relevant. The EU value for “low in sugar” as per Regulation EC 1924/2006 (5g/100g) is applied, to allow a margin for flavouring or for sauces based on e.g. herbs, vegetables, and fruit.
- **Components to encourage:** Positive nutrients are delivered through the main ingredients of these products, as only products that contain ≥ 50g of meat per 100g product are classified in this product group. Meat is an important contributor of protein and its content should be in line with the EC claim “source of” (12% of energy as protein).

What’s in and what’s out?

- *The sodium and saturated fat thresholds will only allow reduced-salt versions of cured meats, exclude most sausages, and generally require all meat products to comply with a fat content < 12%*
- *Meat-based dishes will be challenged by the min 12% energy-from-protein value as well as the sodium value.*

4. Fishery products

Category 4: Fishery products: all kinds of processed fish, processed crustaceans and shellfish, consisting of min. 50g of fish, crustaceans, and/or molluscs per 100g of finished product.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
	<i>*except where specified otherwise</i>				
Cod parings, fried fillet of haddock, fish fingers, pickled mussels, tinned tuna, fish-based dishes (>50% fish)...	≤ 170 OR > 170 IF $\geq 25\%$ of total fat is PUFA	≤ 450	$\leq 33\%$ total fat is SAFA (including TFA)	(≤ 5)	$\geq 12\%$ of energy as protein

- **Product group:** The product group includes all kinds of processed fish, processed crustaceans and shellfish, consisting of minimally 50g of fish, crustaceans, and/or molluscs per 100g of finished product, as well as ready dishes where fish is the main ingredient (>50%) such as “Hake à la Provençale”.
- **Energy:** The threshold (170kcal) is equivalent to 10% of children’s daily reference value (1700kcal), which represents up to 1/3 of the energy content of a meal (510kcal). To stimulate the consumption of fatty fish containing high PUFA levels, fish products that contain PUFA levels over 25% of total fat are permitted to exceed this energy threshold.
- **Sodium:** The sodium threshold (450mg) is the same as applied in The International Choices Programme. More than 50% of the Choices EU database (Roodenburg et al. 2011 bis) complies with this threshold.
- **Saturated fats:** As for the fats and oils product group it is more relevant to express the SAFA threshold as % of total fat: to allow fatty fish (containing around 3-8g SAFA/100g) to comply, but to also provide an incentive for processed lean fish (e.g. fish fingers) to reformulate towards lower SAFA levels (e.g. through application of healthier oils).
- **Total sugars:** for this product group, sugars are not considered to be relevant. The EU value for “low in sugar” as per Regulation EC 1924/2006 (5g/100g) is applied, to allow a margin for flavouring or for sauces based on e.g. on herbs, vegetables, fruit.
- **Components to encourage:** Positive nutrients are delivered through the main ingredients of these products, as only products that contain $\geq 50\text{g}$ of fish per 100g product are classified in this product group. Fish is an important contributor of protein and its content should be in line with EC claim “source of” (12% of energy as protein).

What’s in and what’s out?

- *The sodium threshold is challenging for various pickled, smoked and canned fish products.*
- *The saturated fats threshold is challenging for e.g. (deep) fried fish products*
- *Fish fillets will comply, some non-reformulated fried fish products, and various canned, pickled, and smoked products will often not.*

5. Dairy products

Category 5: Dairy products					
Sub-category A: Dairy Products other than cheeses: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
	<i>*except where specified otherwise</i>				
Milks and milk substitutes; yoghurts; sweet fresh/soft cheese; curd & quark; fermented milks; dairy desserts...	≤170	≤ 300	≤ 2.6	≤ 13.5	Protein: ≥12 E% or ≥2 g /100g or 100ml AND/OR At least one source of: Calcium or Vit D or any Vit B

- **Product group:**
 - **Milk and milk substitutes:** Flavored milk drinks as prepared (product values based on preparation instructions; criteria cut-off per 100ml) or other flavoured powder preparations.
 - **Yoghurts:** Plain or fruit, skimmed, semi skimmed and whole milk yogurts, spoonable or drinkable
 - **Sweet fresh/soft cheese-based, curd, quark products :** Plain or fruit fresh cheeses/curd/quark or preparations with sweet ingredients (e.g. fruits, honey, chocolate) that may have added sugar; sweet cheese-based dip with e.g. cereal sticks
 - **Fermented milk drinks:** buttermilk, plain or fruit based or flavored skimmed, semi-skimmed and whole fat yoghurt drinks
 - **Dairy desserts:** Puddings, mousse, crèmes, flans
- **Energy:** Based on 10% of the children’s reference value per portion (several servings of this basic food group recommended); kcal cut-off per portion without further portion size specification covers big variances in the portion sizes within this category (due to very different product types) and the producer can modify between fat and sugar content and portion size.
- **Sodium:** Fresh dairy products are not a major sodium contributor to the diet, but there is intrinsic sodium + some sodium added with fruit preparation; the threshold value includes a wide range of products such as curd & quark products with higher density.
- **Saturated fats:** The value corresponds to the natural saturated fat content of full fat milk (60-70% of total milk fat is saturated fat, taking into account seasonal variations and variations due to cow feeding); cut off based on the International Choices Programme (Roodenburg et al. 2011 bis) database evaluation and indicator foods. The limit is combined with energy cut-off.
- **Total sugars:** The threshold takes into account the diverse product types within this category; milk contains intrinsic lactose (5 g/100ml) and often natural sugars from added fruit.
- **Components to encourage:** Positive nutrients are delivered through min.50% dairy as a group definition. Dairy stands for a substantial intake of positive nutrients (protein, calcium, vitamins B) Calcium is a very important nutrient to encourage since the contribution to intake from fresh

dairy products is high. Protein min. 12%E as per EU Regulation – since energy levels can differ between types of products, a min. protein content of 2g/100ml is also set; Calcium, Vitamins D and B in significant amount as per EU Regulation i.e. 15% of RDA per 100g; for drinks 7.5% of RDA per 100ml. Calcium: 120mg per 100g or 60mg per 100ml; For Vitamins B, it depends on the Vitamin, but for example : VitB12: 0.375µg per 100g or 0.1875µg per 100ml; VitB2: 0.21mg per 100g or 0.105 mg per 100ml.

What's in and what's out?

- *Controlled fat and sugar milk/yoghurt drinks in appropriate portions will comply, as will plain or fruit, skimmed, semi skimmed and whole milk yoghurt, as well as controlled -fat / sugar sweet cheese-based dips*
- *Yoghurt in large serving sizes, indulgent yoghurts and non-fat/salt controlled dips will not*
- *Plain or fruit or flavored drinking yoghurts prepared with skimmed, semi-skimmed or whole fat milk that are controlled for sugar & fat (150-200ml portion) will comply as long as they meet the energy and sugar thresholds.*
- *Desserts such as caramel Puddings, chocolate mousse or crème caramel will not comply, with a few strictly reformulated exceptions.*

Category 5: Dairy products					
Sub-category B: Cheese and savoury dairy based products: Must contain minimum 50% dairy (Codex Alimentarius standard)					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Hard, semi-hard cheeses					
Gouda, Edam, blue cheese, gorgonzola...	≤ 85	≤ 900 if SAFA ≤ 15 or ≤ 800 if SAFA ≤ 16	≤ 15 if sodium ≤ 900 or ≤ 16 if sodium ≤ 800	(≤ 5)	At least one source of: Calcium, Vit B12, Vit B2
Other cheeses, curd & quark and savory dairy-based products					
Cream cheese, quark, processed cheese slices...	≤ 170	≤ 800	≤ 10	≤ 8	

Hard-/Semi-hard cheeses:

- **Product group** (Codex standard for Cheese 283-1978 definition): Ripened cheese with different fat percentage in dry matter (20+/30+/45+ etc.)
- **Energy:** The threshold is based on 5% of children's reference intake value; lower %- value for fat-reduced cheeses that have less variable and smaller serving sizes than the sweet dairy products. Note: SFA criterion is already limiting/defining the energy content of the product due to the proportional amount of fat/SFA in milk fat.
- **Sodium:** Sodium in hard/semi hard cheese is needed for the cheese making process and for conservation. Due to recent and ongoing sodium reduction initiatives in several EU Member States, the 2012 EU Pledge Nutrition White Paper foresaw the potential to further reduce this

value in 3 years' time. Having reviewed the situation in early 2015, the EU Pledge Nutrition Working Group agreed to introduce an optional lower sodium threshold (800mg/100g) to incentive further sodium reduction. To make this lower sodium threshold workable, the accompanying maximum SAFA threshold is raised by 1g/100g, to 16. If the lower sodium threshold is not used, the SAFA threshold remains at 15g/100g.

- **Saturated fats:** The value allows fat-reduced 30+ Cheese to comply; still acceptable in taste for consumers and it supplies a lot of positive nutrients, such as Ca; P; B2; B12; A; K; Zn; Se
- **Total sugars:** For this product group, sugars are not considered to be relevant, since no sugar is naturally present in cheese. The EU value for "low in sugar" as per Regulation EC 1924/2006 (5g/100g) is stated.
- **Components to encourage:** Min. 50% dairy as the group definition; therefore does contain several positive nutrients e.g. at least one source of: Calcium, Vit B12, B2.

Other Cheeses, curd & quark and savory dairy-based products:

- **Product group:**
 - Processed cheese: (Codex standard for processed cheese preparations A-8©-1978 definition): Products made of cheese subjected to a process of melting, grinding, mixing and emulsifying with the aid of heat that may have other ingredients added (e.g. other dairy ingredients/whey, emulsifiers, salt, ingredients to flavour), for example processed cheese slice, spread and preparations (e.g. with ham).
 - Fresh/Soft cheese (Codex standard for Cheese 283-1978 definition): Unripened cheese with different fat % in dry matter (20+/30+/45+ etc.), curd/quark, including plain, flavored and prepared with other ingredients (e.g. ham); savory dairy-based products e.g. cheese dip with bread sticks/corn chips.
- **Energy:** The threshold is based on 10% of children's reference intake value. The key discriminating factor in this category is not energy but saturated fat content.
- **Sodium:** The value corresponds to the UK Responsibility Deal target for processed cheese slices, strings etc.
- **Saturated fats:** The lower saturated fat limit than for natural cheese will only allow fat-reduced versions of other cheeses to comply.
- **Total sugars:** Allows some added sugars, e.g. coming from flavour preparations and from the additional component (e.g. bread stick) in the dip products.
- **Components to encourage:** Min. 50% dairy as the group definition; therefore does contain several positive nutrients e.g. at least one source of: Calcium, Vit B12, B2

What's in and what's out?

- *30% reduced-fat cheeses will meet the criteria with additional sodium cut-off; full-fat cheeses will not.*
- *Fat-reduced savoury fresh/cream/soft cheeses (if meeting sodium as well), other cheeses prepared with additional ingredients, e.g. ham, may fail the sugar criterion.*
- *Savoury dairy-based products, such as cheese dip with bread sticks will not meet criteria unless of the reduced-fat and salt variety.*

6. Cereal based products

Category 6: Cereal based products					
Sub-category A: Sweet biscuits, fine bakery wares and other cereal based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
All kinds of biscuits and cakes, cereal bars, flapjacks...	≤ 200	≤ 450	≤ 10	≤ 35	Fibre (≥3 g/100g) and/or whole grain (15% of total ingredients) and or 20% energy from UFA and 70% UFA/total fat

- **Product group:** Category definition: cereal must be listed as the main ingredient on the ingredient declaration. Products included in this category can be consumed as snacks but also part of other meal occasions such as breakfast. Portions are defined by sectoral associations, e.g. the European Chocolate, Biscuit and Confectionery Association (CAOBISCO) and the European Snacks Association (ESA) or unit designed to be consumed on one occasion.
- **Energy:** The threshold is equivalent to 12% of children’s reference intake value. Given that a typical breakfast accounts for 20% of daily energy intake, the 12% value for cereal-based products leaves sufficient room for other breakfast components, dairy and fruit (juice).
- **Sodium:** This is the maximum level set in the UK’s Responsibility Deal for sweet biscuits.
- **Saturated fats:** The value corresponds to the upper limit of what can currently be achieved through reformulation efforts across the range of product types within this category.
- **Total sugars:** This cereal category contains a wide range of products; some of these may contain fruit or milk, which are sources of naturally occurring sugars. No scientific support for negative effect in this category. The bulking effect of sugar requires substitution when reducing this nutrient with a risk of fat – and thus energy – increasing.
- **Components to encourage:** The 3g fibre/100g is equivalent to the legal requirement for the “source of fibre claim” under the EU Nutrition and Health Claims Regulation and represents a significant amount. The value for unsaturated fatty acids (UFA) is equivalent to the value used required for the “high unsaturated fat” claim under the EU Nutrition and Health Claim Regulation.

What’s in and what’s out?

- *Biscuits made with wholegrain and products with special focus on better fat composition are included.*
- *Some cereal bars and biscuits with fruity filling will not pass because of their sugar content.*
- *Most products with a fatty filling or chocolate covered will not pass because of saturated fat content.*
- *Many products based on flour will not fulfil the positive criteria for fibre/wholegrain.*

Category 6: Cereal based products					
Sub-category B: Savoury biscuits, fine bakery wares and other cereal based products, including dough-based products: cereal must be listed as the main ingredient on the ingredient declaration.					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Savoury crackers, extruded snacks, pelleted snacks, pretzel products, popcorn & popcorn-based snacks...	≤ 170	≤ 900	≤ 10%kcal from SAFA	≤ 10	Fibre: ≥3 g/100g; and/or ≤ 70% UFA/ total fat

- **Product group:** Category definition: cereal must be listed as the main ingredient on the ingredient declaration.
- **Energy:** These products are usually intended to be consumed as snacks; the 170kcal value corresponds to 10% of daily intake reference value for children. The reference portion is 30g.
- **Sodium:** Based on UK Responsibility Deal 2012 targets for pelleted snacks.
- **Saturated fats:** The SAFA limit of 10% of energy is consistent with international dietary guidelines for saturated fat intake.
- **Total sugars:** This level of sugars is consistent with the international consensus that ≤10% energy should be derived from added sugars. Sugars are not discriminatory for this category; levels are usually low and are associated with seasoning applications.
- **Components to encourage:** The 3g/100 fibre is equivalent to the legal requirement for the “source of fibre claim” under the EU Nutrition and Health Claims Regulation and represents a significant amount. The value for unsaturated fatty acids (UFA) is equivalent to the value used required for the “high unsaturated fat” claim under the EU Nutrition and Health Claim Regulation.

What’s in and what’s out?

- *Sodium and saturated fat are the key discriminating values for this category. Many pretzel-type products, for instance, will not meet the set values.*

Category 6: Cereal based products					
Sub-category C: Breakfast Cereals including porridge					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Ready to eat breakfast cereals, e.g. cornflakes, puffed rice, porridge...	≤ 210	≤ 450	≤ 5	≤ 30	Fibre (≥3g/100g) and/or wholegrain (15% whole grain per total ingredients)

- **Product group:** Category definition: cereal must be listed as the main ingredient on the ingredient declaration. Products included in this category can be consumed as snacks but also part of other meal occasions such as breakfast. Portions are defined by sectoral associations, e.g. the European Breakfast Cereals Association (CEEREAL) and the European Snacks Association (ESA) or unit designed to be consumed on one occasion. For porridges and similar products, values in this category apply to food as reconstituted, ready for consumption, following manufacturer’s instructions.
- **Energy:** This threshold represents c. 12% of children’s reference intake value. This value is designed to enable products intended to be consumed as part of a balanced breakfast to be included. It is slightly higher than the threshold for sweet biscuits, fine bakery wares and other cereal based products (210 instead of 200kcal/portion) to enable the inclusion of porridge-based products that require reconstituting prior to consumption, usually with the addition of milk. For ready to eat cereals that do not need to be reconstituted, the values apply to the cereals as sold.
- **Sodium:** The sodium value (450mg) is corresponds to the maximum target set by the UK’s Department of Health in its Responsibility Deal.
- **Saturated fats:** Below the level proposed in the International Choices Programme model (Roodenburg et al. 2011).
- **Total sugars:** The 30g/100g value corresponds to <11% of children’s reference value (based on 85g sugar/day), well within breakfast recommendations (18% sugar reference value including contribution from milk). This is also a significantly reduced value from currently used criteria. These products may contain fruit, which is a source of naturally occurring sugars.
- **Components to encourage:** The 3g fibre/100g is equivalent to the legal requirement for the “source of fibre” claim under the EU Nutrition and Health Claims Regulation and represents a significant amount.

What’s in and what’s out?

- *Sugar content is the key discriminating value. Out of 169 children’s products available in UK, France, Italy, Spain and Germany (representing top 80% of children’s products sold), 85 (50%) will not meet the 30g sugar level. Many chocolate and sugar-coated ready-to-eat products will not qualify. On the other hand, products such as porridge oats will.*
- *The sodium threshold is also discriminating: some extruded products with lower sugar will not qualify.*

Category 6: Cereal based products

Sub-category D: Cereal and cereal products except breakfast cereals, biscuits and fine bakery wares: cereal must be listed as the main ingredient.

Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Bread, rusks, rice, noodles, pasta, polenta...	≤340	≤500	≤5	≤5	Fibre (≥3 g/100 g) and/or wholegrain (15% of total ingredients)

- **Product group:** Category definition: cereal must be listed as the main ingredient on the ingredient declaration. These products include staples such as bread, noodles, pasta polenta etc. Values in this category apply to food as reconstituted, ready for consumption, following manufacturer's instructions.
- **Energy:** The 340kcal threshold corresponds to 20% of children's daily reference intake value. These products usually constitute a significant part of a meal: based on reference intake values, the energy content of lunch or dinner is 510kcal, so that the 340kcal limit for these products leaves 170kcal for other meal components.
- **Sodium:** The sodium value, 500mg/100g, is similar to the value used in the International Choices Programme (Roodenburg et al. 2011) system. It is challenging for a range of products and should stimulate innovation.
- **Saturated fats:** Below the level proposed in the International Choices Programme model (Roodenburg et al. 2011).
- **Total sugars:** The 5g/100g sugar threshold reflects the fact that some of these products contain a certain amount of naturally occurring sugars.
- **Components to encourage:** The 3g fibre/100g is equivalent to the legal requirement for the "source of fibre" claim under the EU Nutrition and Health Claims Regulation and represents a significant amount.

What's in and what's out?

- *Components to encourage (fibre and/or whole grain) criteria are challenging for most traditional wheat based products if not reformulated: instant noodles, pasta, spaetzle, semolina gnocchi ...*
- *Salt reduced versions of ready to eat polenta may comply as made from milled whole corn (maize).*

7. Soups, composite dishes, main courses and filled sandwiches

Category 7: Soups, composite dishes, main courses and filled sandwiches					
Sub-category A: Soups: all kinds of soups and broths containing min 1 of the following: 30g fruit, vegetables ²⁵ , cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions).					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
	<i>*except where specified otherwise</i>				
Tinned tomato soup, instant vegetable soup, soup in stand-up pouches...	≤ 170	≤ 350	≤ 1.5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or vegetables, cereals, meat, fish, milk)

- **Product group:** The product group includes all kinds of soups and broths containing min 1 of the following: 30g fruit, vegetables, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion.
- **Energy:** The threshold (170kcal) is equivalent to 10% of children's daily reference value (1700kcal) per portion (200ml).
- **Sodium:** The sodium threshold (350mg) is the same as applied in the International Choices Programme (Roodenburg et al. 2011). This sodium value may not be challenging for UK, which is ahead in the sodium reduction journey, but is very challenging in many other European countries.
- **Saturated fats:** The threshold (1.5g) corresponds with "Low in saturated fat", as defined in Regulation (EC) 1924/2006 on nutrition and health claims made on foods.
- **Total sugars:** The threshold is set at 7.5 g to allow soups prepared from high sugar containing vegetables (e.g. beet root, sweet pepper, corn, tomato) to comply, and to stimulate (and not penalize) innovation towards high vegetable content soups.
- **Components to encourage:** Positive nutrients are delivered through the main ingredients of the soups, as only soups that contain min 1 of the following: 30g fruit, vegetables, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion, are classified in this category. This is equivalent to ½ child's portion of the above. For many soup products, it is very challenging to comply with this.

What's in and what's out?

- *The saturated fats threshold is challenging for cheese, meat and cream containing soups*
- *For many soup products, it is very difficult to comply with the "components to encourage" criteria*

²⁵ See footnote 22

Category 7: Soups, composite dishes, main course and filled sandwiches

Sub-category B: Composite dishes, main dishes, and filled sandwiches: all kinds of dishes and sandwiches containing min 2 of the following: 30g fruit, vegetables²⁶, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion. (Thresholds apply to food as reconstituted, ready for consumption, following manufacturer's instructions).

Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fat (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
<i>*except where specified otherwise</i>					
Pasta salad with vegetables, noodles with sauce, pizza, croque-monsieur, moussaka, filled pancakes	≤ 425	≤ 400	≤ 5	≤ 7.5	Nutrients delivered through ingredients (fruits and/or vegetables, cereals, meat, fish, milk)

- **Product group:** The product group includes all kinds of dishes and sandwiches containing min 2 of the following: 30g fruit, vegetables, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion.
- **Energy:** Dishes should not contribute more than 25% of daily reference intake value for children (which corresponds to the threshold of 425kcal/portion). Reference portion is 200g.
- **Sodium:** The sodium threshold (400mg) is in line with various UK Responsibility Deal 2012 targets (400mg for pizza, 450mg for ready meals; high salt fillings sandwiches: 400mg). Consumers will add salt when sodium content it is too low.
- **Saturated fats:** The threshold (5g) is suitable for this broad group of very different types of dishes. For a 425kcal dish this value would represent ~10% of energy coming from saturated fat.
- **Total sugars:** the threshold is set at 7.5g to allow dishes prepared from high sugar containing vegetables (e.g. beet root, sweet pepper, corn, tomato) to comply, and to stimulate (and not penalize) innovation towards high vegetable content dishes. For a 425kcal dish this value would represent ~7% of energy coming from sugars.
- **Components to encourage:** positive nutrients are delivered through the main ingredients of the dishes, as only these dishes that contain min 2 of the following: 30g fruit, vegetables, cereals, meat, fish, milk or any combination of those (calculated as fresh equivalent) per portion, are classified in this category. This is equivalent to ½ child's portion of the above.

What's in and what's out?

- *The sodium threshold is challenging for most composite dishes especially for those containing cheese such as pizza, pasta gratins and croque-monsieur (if not reformulated)*
- *The saturated fats threshold is challenging for cheese, meat and cream containing products*

²⁶ See footnote 22

8. Meals

Category 8: Meals: The combination of items served as meal (main dish, side item (s) and a beverage) for breakfast, lunch or dinner

Examples	Energy (kcal per meal*)	Sodium (mg per meal)	Saturated fats (g per meal*)	Total sugars (g per meal)	Components to encourage
Children's meals	≤510 ^{a)} ≤340 ^{b)}	≤660	≤10% Kcal from saturated fats	≤20 (minus natural occurring sugar ^{c)} from 1 portion ^{d)} J/F/V/M/D)	Each meal must contain min. of: 1 portion ^{d)} fruit/vegetables ²⁷ or/and 1 portion ^{d)} 100% juice or/and 1 portion qualified ^{d,e)} dairy product or milk or/and 1 portion ^{d)} of whole grain ^{f)}

Notes:

^{a)} For lunch/dinner (30% energy)

^{b)} For breakfast (20% energy)

^{c)} If sugar content is higher than 20g for a meal and contains more than 1 J/F/V/M/D.

^{d)} Portions are:

- Fruits (F)/Vegetables (V): 60-80g
- 100% juice (J): 150-250ml
- Dairy (D): e.g. 30g cheese/100-150g yoghurt
- Milk (M): 150-250ml

^{e)} Meet individual category requirements

^{f)} Product qualified for a reasonable source of fiber which contains ≥ 8g whole grain

- **Product group:** A Meal is defined as the combination of items served as meal (main dish, side item (s) and a beverage) for breakfast, lunch or dinner. Although there is not a commonly agreed upon reference for “meal” in the EU²⁸, the United States Food and Drug Administration (FDA) uses the following definition: a meal is a group of food that:

(1) Makes a major contribution to the total diet by:

(i) Weighing at least 10 ounces (oz) per labeled serving; and

(ii) Containing not less than three 40-g portions of food, or combinations of foods, from two or more of the following four food groups, except as noted in paragraph (l)(1)(ii)(E) of this section:

²⁷ See footnote 22

²⁸ The European Commission's 2009 draft nutrient profiles for the application of Article 4(1) of Regulation 1924/2006 on nutrition and health claims made on food does not refer to meals as a combination of different items. The LIVSFS- labeling system (Swedish key whole scheme) does not have details for meals (only ready to eat meals intended to be a main dish during breakfast, lunch or dinner, such as pizza, wraps, sandwiches, soups...). The Choices International Foundation only refers to main course/sandwich in a meal not to the whole meal. There is no meal category in the EUROFIR system. The EFSA-evaluation of the FoodEX food classification system (EFSA Journal 2011; 9(3) 1970 page 22) is proposing to add meals that contain a combination of ingredients, as this is not part of the 20 categories, but for the time being there is only reference to ready-to-eat products. The UK FSA nutrient profiling system does not refer to meals, but offers a scoring system with points for the specific nutrient content of 100 g of food or drink.

- (A) Bread, cereal, rice, and pasta group;
 - (B) Fruits and vegetables group;
 - (C) Milk, yogurt, and cheese group;
 - (D) Meat, poultry, fish, dry beans, eggs, and nuts group; except that;
 - (E) These foods shall not be sauces (except for foods in the above four food groups that are in the sauces), gravies, condiments, relishes, pickles, olives, jams, jellies, syrups, breadings or garnishes; and
- 2) Is represented as, or is in a form commonly understood to be, a breakfast, lunch, dinner, or meal.

- **Energy:** The thresholds of ≤ 510 kcal for a lunch or dinner meal and ≤ 340 kcal for a breakfast meal are based represent 30% of energy for lunch/dinner and 20% for breakfast of children's daily reference value (1700 kcal), as set out in the Energy Values section above.

The justification for the recommended thresholds is based on a nutrition science review and comparison with the currently existing EU pledge commitments of both companies Burger King Europe (own thresholds system²⁹) and McDonald's Europe (OFCOM system plus 533kcal per meal)³⁰. Furthermore the McDonald's Europe GDA for Kids criteria, used for the company's own nutritional labeling are also taken into consideration. As additional support and comparison, the US Institute of Medicine (IOM), and Dietary Guidelines nutrient levels were utilized as a tool for further justification.

- **Sodium:** According to WHO a moderate low salt/sodium diet should have not more than 5g salt/day for adults and 3g for children. Current EU Commission salt GDA for adults is 6g, there is no value for children available. Due to the limited number of official recommendations for salt/sodium intake available for children we base our calculation on SACN (UK) data and their rationale to take real consumption into consideration (SACN 2003). The reference value for children aged 4-8 is 1.4g sodium per day (=3.5g salt per day). Using the 1/3 GDA approach this would be a threshold of 466mg sodium per meal. In the US, the IOM School Meals sodium recommendations are ≤ 640 mg for 5–9 year-olds and ≤ 710 mg for 10–13 year-olds for school lunches. To define a threshold for children's meals that reinforces the importance of lower sodium intake and supports further reduction steps, but also reflects reality, a combination of recommendations along with communicated values in different profiling systems is used. (The sodium thresholds for different product categories, 300-400 mg/100g for main dishes, fruits and vegetables, dairy products have been applied.) As a meal is a combination of different items (main dish, side item(s) and beverage), including fruits, vegetables, dairy products and juices or

²⁹ BK Europe criteria:

- No more than 560 calories per meal
- Less than 30 percent of calories from fat
- Less than 10 percent of calories from saturated fat
- No added trans fats
- No more than 10 percent of calories from added sugar
- No more than 1.67 g of salt or 660 mg of sodium
- No artificial colorings and flavorings

³⁰ McDonald's Europe criteria - UK (FSA) OFCOM System plus limit to 533 kcal/meal

Note: Classification is related to a product (100g), not to a meal. Positive nutrients can make up for negative „A“ points. A meal containing one HFSS item doesn't meet current EU pledge criteria. The system is an external and official rating system in the UK.

low fat milk as a drink option, a combined threshold seems to have legitimacy. On this basis, the chosen threshold is ≤ 660 mg sodium/meal.

- **Saturated fats:** Based on WHO recommendations for daily intake of total fat and SFA there is a common understanding and alignment in nearly all scientific publications, profiling systems and recommendations that the daily intake for SFA should be $\leq 10\%$ of energy. There is no difference in recommendations for children or adults. This recommendation was taken as justification for the defined threshold $\leq 10\%$ of energy (for the individual meal).
- **Total sugars:** In the absence of quantitative guidelines for intake of total sugar for children in Europe, we decided to align with the UK Institute of Grocery Distribution (IGD) approach to calculate the GDA value for total sugar on a typical day intake of sugar. Following WHO recommendations for a typical diet (different portions of fruits, vegetables, dairy....) this would be about 20% of Energy as a GDA for total sugar, also for kids. For a 1700 kcal diet, this would be 85g sugar per day. This is in line with the NSG recommendation. The “Meal” category will work with a threshold of ≤ 20 g of total sugars. Excluded from this limit are sugars from food groups to encourage (if needed). This is in an effort to encourage the use of these food groups with beneficial nutrients to children. The naturally occurring sugars from ONE qualifying low-fat dairy, fruit without added sugars and fruit/vegetable juices or blends with no added sugars will not be counted toward the total sugar limit.
- **Components to encourage:** To be consistent with and to fully support dietary guidelines and qualitative recommendations for balanced diets for children, **each meal will contain minimum:** 1 portion fruit/vegetables or a mix of both and/or 1 portion 100% juice and/or 1 portion qualified (meet category requirements) low fat dairy product or low fat milk and/or 1 portion of whole grain product. The food groups to encourage will add essential vitamins, minerals and fiber, which are known to be lacking in many children’s daily diets. Rationales for portion sizes for food groups to encourage:
 - **Portion of fruit/vegetable:** It was agreed that 100% fruit and vegetable products are exempted from any category/threshold system and can be advertised to children under 12 without restrictions. Following the recommendations for balanced diets for children, we feel it is necessary to have portion size guidance. There is a need for a minimum portion size. As fruits add sugar a recommendation of an upper limit is also given. The UK (FSA) 5 a day recommendation for adults indicates a portion size of 80g for fruit and vegetables. For children 0-6 years a portion size of 60g is recommended, for older children the same 80g as for adults. FDA/USDA definitions of serving size for fruit and vegetables are $\frac{1}{2}$ cup. The “Meal” category therefore defines a portion of fruit or vegetable 60-80g.
 - **Portion of 100% juice:** It was agreed that 100% juices are exempted from any category/threshold system and can be advertised to children under 12 without restrictions. The UK (FSA) 5 a day recommendation indicates a portions size of 150ml of. FDA/USDA definitions of serving size for juice is 1 cup. The “Meal” category defines a portion of juice 150ml-250ml. These are also volumes offered as servings in glasses and “portion” bottles.
 - **Portion of qualified dairy product or milk:** Qualified dairy products or milk products have to meet the individual category requirements. There is a need for a minimum portions size. FDA/USDA recommendation is e.g. max 1oz of cheese, max 8oz of milk and max 6oz of yoghurt. The “Meal” category defines a portion of milk 150ml-250ml. For

dairy products examples are: max 30g cheese or 100-150g yoghurt. These are also volumes offered pre-packed.

- **Portion of whole grain:** The work done by the US Whole Grains Council was taken as reference and provides an excellent overview on the existing definitions of whole grain and portion sizes. The “Meal” category defines a product qualified for a reasonable source of fiber which contains ≥ 8 g whole grain.

What’s in and what’s out?

- *Only meals specifically designed for children will comply*
- *Among these, only some will qualify, e.g.: 4 Chicken Nuggets, Cherry tomatoes and orange Juice; Hamburger, Fruit bag and low-fat milk; Fish fingers, Small Fries and Mineral Water.*
- *Meals such as Hamburger, French Fries and Soft drink or even Mineral water; or any meal combination with Cheeseburger will not qualify.*

9. Edible ices

Category 9: Edible ices: all kinds of edible ices (water ices and ice cream)					
Examples	Energy (kcal/portion*)	Sodium (mg/100g or 100ml*)	Saturated fats (g/100g or 100ml*)	Total sugars (g/100g or 100ml*)	Components to encourage
	<i>*except where specified otherwise</i>				
Ice cream, water ice, ice lollies, sherbet ice	≤ 110	≤ 120	≤ 5	≤ 20	-

- **Product group:** The product group includes all kinds of edible ices (water ices and ice cream). An edible ice category was created on the grounds that compliant products are responsible treats with a controlled and suitable energy content. Portion sizes are limited through the energy criterion. These products are no alternatives for dairy or fruit, and therefore should not be classified as such.
- **Energy:** The threshold (110kcal/portion) is the same value as applied for snacks in the International Choices Programme (Roodenburg et al. 2011). This value represents 6.5% of the reference daily intake for children (1700kcal). These are occasional products, with a low contribution to the daily energy intake. This 110kcal threshold is lower than the 10% (170kcal) energy cap used elsewhere, as for this product group no nutrients to encourage are defined. Portion size is limited by the energy threshold.
- **Sodium:** For this product group, sodium is not considered to be relevant. The EU value for “low sodium” is applied, to allow a margin for inclusions.
- **Saturated fats:** Both SAFA and sugar are important for technological properties: creaminess, taste, physical stability, softness. Through innovation industry tries to maintain these properties while using less SAFA and sugar. Saturated fat is important for the creamy texture and the creation of the whipped structural network and plays a major role for structure stability: the setting point of the used fats dictates the crystallization process of the fat to obtain a stable ice cream.
- **Total sugars:** The sugar threshold (20g) is in line with the Choices International criterion for snacks (Roodenburg et al. 2011). Such a sugar criterion prevents high sugar-content ices from qualifying and ensures that daily intake of added sugar could not exceed maximum daily recommendations (<25% energy) as set by the US Institute of Medicine (IOM 2005). Sugar has technical properties that are essential for the structural characteristics of both water ices and ice creams. It is essential for the control of ice crystal formation and the lowering of freezing point.
- **Components to encourage:** Positive contribution is very challenging for the category as the presence of a main food group is low and serving sizes are small. These products have controlled levels of energy, SAFA and sugar.

What's in and what's out?

- *Internal data from member companies show that only 10% of the total ice portfolios comply with the 110kcal threshold.*
- *For children's products around 50% of the portfolio complies with the 110kcal threshold, as many products are currently being reformulated.*

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Annex I: Energy values

Energy values used in the EU Pledge Nutrition Criteria are calculated as a percentage of reference intake values. It is important to note that quantitative guidelines for children are not numerous. Nutritional needs for children aged 1-12 are not comprehensively researched, especially not if they are not clearly linked to a risk of obesity and chronic diseases. Currently there are no officially approved or EU-endorsed daily reference values for children available in Europe. We therefore based our approach on existing reference intake values in the US and some European countries.

US Dietary Reference Intakes (DRI) (IOM 2005) has recommended daily energy needs of moderately active boys and girls of the age groups 1-2 years, 3-8 years and 9-13 years. As many countries that have not developed dietary reference intakes use the US DRI, we based our estimation of energy needs of children on the US DRI. For that, we calculated the medians of the values for boys aged 3 years to 8 years (included) as well as for girls of the same age. We excluded the values for children aged 9-13 in order to obtain a conservative estimate, with a view to the overall public health concern in hand, namely childhood obesity. Then we calculated the mean of these two values. Medians for energy intake in boys and girls 3-8 years old are respectively 1742 and 1642 kcal/day, which results in an average value of 1692 kcal/d, rounded to 1700 kcal/d for moderately active children.

To check the legitimacy of this average value, we performed the same calculation on recommendations for energy intake published by European countries (DoH 1991, FSAI 1999, DGE 2000, Eurodiet 2001, Martin 2001, Standing Nordic Committee on Foods 2004, Conseil Supérieur de l'Hygiène 2009, Gezondheidsraad 2006), and we compared the new values to the first one. In Europe, average child energy requirement is considered around 1360 kcal for 4 years of age, 1640 kcal for 6 years of age, 1860 kcal for 8 years of age, and more than 2000 kcal above 9 years of age (Table 1). The average energy requirement for children of 4-8 years of age inclusive was thus calculated to be 1770 kcal/d, close to the 1700 kcal/d value calculated for children aged 3-8 using US DRI.

Table 2: Energy requirements of children in some European country (data adapted from Prentice et al., 2004)

Denmark, Finland, Iceland, Norway, Sweden	1-3 y	4-6 y	7-10 y	11- 14 y				
	1411	1663	1914	2177				
Italy	2 y	3 y	4 y	5 y	6 y	7y	8 y	9-11 y
	1160	1412	1471	1579	1723	1710	1866	1986
Spain	1-3 y	4-6 y	7-9 y	10- 12 y				
	1244	1699	2058	2249				
Austria, Germany, Switzerland	1-3 y	4-6 y	7-9 y	10- 12 y				

	1089	1460	1795	2141				
France	2 y	3 y	4 y	5 y	6 y	7 y	8 y	9 y
	1050	1150	1250	1400	1650	1800	1900	2050
United Kingdom	1-3 y	4-6 y	7-10 y	11-14 y				
	1208	1639	1854	2034				

In addition, the 1700 kcal/day value is consistent with the results reported in a meta-analysis (Torun 1997) of 42 studies, involving 1982 boys and 1969 girls in developed industrialised countries, and 1236 boys and 1116 girls in developing countries, which calculated energy requirements from energy expenditure of children of different ages with light, moderate, or heavy physical activity. Average value for boys and girls of 4-8 years of age was around 1600 kcal/d.

Overall, the energy requirement of children ranges from around 1400 kcal at 4yr old to around 1800 kcal at 8yr old, thus the average value of 1700 kcal/d for children aged 4-8 years, based on the DRI published by the US Institute of Medicine (IOM 2005) appears legitimate.

Given that the EU Pledge commitment concerns all children up to the age of 12, the chosen value of 1700 kcal/day is conservative but justifiably so in light of the overall public policy objective of tackling childhood obesity.

Annex II: Key reference documents

The following sources are not necessarily referenced in the White Paper, but were consulted for the purposes of the informing the work of the EU Pledge Nutrition Working group:

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