

## What is the Nutri-Mark?

The Nutri-Mark is a front-of-pack label that provides information on the nutritional quality of products in simplified form that complements the mandatory back-of pack nutritional declaration.

It is based on a scale of 5 Letters/Colours ranging from A (dark green) through B (light green), C (yellow), D (light orange) to E (dark orange), designed to optimize its accessibility and understanding by the consumer

The purpose of the Nutri-mark is to help the consumer better see, interpret and understand the nutritional value of products. The objective is not to separate 'good' foods from 'bad' foods, but rather to use the 5 classes to distinguish foods that are healthier from those that are less healthy from a nutritional point of view. This also helps food producers to decide how to reformulate their products so they can move to a higher Nutri-mark rating



## Origin of the Nutri-mark

The Nutri-mark is based on the 2023 revision of the Nutri-score front-of-pack nutritional labelling system first implemented in France in 2017. The Nutri-score system was originally developed based on work by the team of Serge Hercberg, as well as expertise from the French Agency for Food, Environmental and Occupational Health and Safety (ANSES) and the High Council for Public Health (HCSP). Several European Union countries have decided to recommend the label: Belgium, Switzerland, Germany, Spain, the Netherlands and Luxembourg.

## Nutri-Mark Scope

### Who uses the Nutri-Mark?

The Nutri-Mark is relevant to all Abu Dhabi food business operators at all stages of the food chain, where their activities concern the provision of food information for customers. It is applicable to foods intended for the final consumer, including foods delivered by mass caterers and foods intended for supply to mass caterers.

## **Which products are covered by the Nutri-Mark?**

The food products covered by the Nutri-Mark are those with a mandatory nutritional declaration in accordance with the standard UAE.S GSO 2233 – Requirements of nutritional labeling. In most cases the available data on the mandatory nutritional declaration is what must be used to calculate the Nutri-Mark.

## **Which products cannot use the Nutri-Mark?**

Products that are not covered by the mandatory nutritional declaration of UAE.S GSO 2233 are excluded from the scope of the Nutri-Mark labelling scheme, including:

- Infant food for children aged 0-3
- Sports Nutrition products
- Products designed for special diets including
  - Infant formula and follow-on formula
  - Processed cereal-based food and baby food
  - Food for special medical purposes
  - Total diet replacement foods for weight control
- Meal replacement products which do not have a goal of weight control
- Food supplements
- Alcoholic drinks (containing more than 0.5% alcohol)

## **What type of products are included under ‘processed cereal-based food and baby food’?**

Follow the guidance of EU Regulations 1169/2011 and 609/2013 to further define products for which the use of the Nutri-Mark is not eligible under Processed cereal-based foods which is an umbrella term for the following categories:

- Simple cereals which are or must be reconstituted with milk or other appropriate nutritious liquids
- Cereals with added high protein food which are or have to be reconstituted with water or other protein-free liquid
- Pastas which are to be used after cooking in boiling water or other appropriate liquids

- Rusks and biscuits which are to be used either directly or, after pulverisation, with the addition of water, milk or other suitable liquids.

### **Which products are exempted from using the Nutri-Mark?**

Certain products can be considered as exempt or inappropriate for use of the Nutri-Mark, including:

- Unprocessed products that comprise a single ingredient or category of ingredients (such as fresh fruits or vegetables, cut raw meat, honey, etc)
- Processed products where the only processing they have been subjected to is maturing and that comprise a single ingredient or category of ingredients
- Herbs, spices or mixtures thereof, Salt and salt substitutes, Table top sweeteners, Flavourings, food additives, processing aids, food enzymes, Geletine, Jam setting compounds, Yeasts, Chewing Gums
- Products relating to coffee extracts and chicory extracts, whole or milled coffee and decaffeinated coffee beans, Herbal and fruit infusions, tea, decaffeinated tea and instant or soluble tea extracts
- Fermented vinegars and substitutes for vinegar, including those where the only added ingredients are flavourings
- Food in packaging or containers the largest surface of which has an area of less than 25 cm<sup>2</sup>
- Food, including handcrafted food, directly supplied by the manufacturer of small quantities of products to the final consumer or to local retail establishments directly supplying the final consumer

In the case of food products that are not subject to mandatory nutritional declaration (in accordance with UAE.S GSO 2233), if the nutritional declaration is presented, the manufacturer/supplier can choose to also display the Nutri-Mark on their products, unless they fall under the exclusions in the previous section (“Which products cannot use the Nutri-Mark?”). The choice should be applied by the manufacturer/supplier to all products of the same food category and not for each product separately.

Notably, with products that are packaged on-site in stores, the Nutri-Mark may be added if there is a nutritional declaration on or associated with the product.

# Nutri-Mark Calculation

## General Calculation Rules

A product's nutritional score, used to determine which Nutri-mark grade is applied, is calculated using the data from the nutritional declaration per 100 g or 100 mL of product as sold (except in specific cases) and from the ingredient list. Points are attributed according to the content as:

- 'unfavourable' elements, an excess of which is considered unhealthy: energy in KJ, sugars, salt and saturated fatty acids (and non-nutritive sweeteners for beverages)
- 'favourable' elements: protein, fibres, fruits, vegetables, legumes, nuts, and rapeseed, walnut and olive oils

The final nutritional score for a food is found by subtracting the total number of favourable points from the total number of unfavourable points. In addition, the level of unfavourable points can cause the favourable points to vary depending on whether points for protein are counted (see calculation scenarios).

The detailed nutritional score points calculation rules are described in the Abu Dhabi Guideline for use of the Nutrition Mark (ADG 44). The QCC have provided the excel spreadsheet-based calculation tool for the purpose of inputting nutritional values and automatically calculating the nutritional score of the product, along with the Nutri-Mark Grade.

## Source of Nutritional Information Used

### Nutritional Declaration, List of Ingredients

The nutritional calculation algorithm and the method for determining the Nutri-Mark classification thresholds are made publicly available to ensure transparency and reproducibility of the system.

The nutritional score is calculated using the declared nutritional data (Energy (kJ), Fat (g), Saturated fatty acids (g), Sugars (g), Proteins (g), Salt (g), Fibres (g)) listed on the package per 100 g or 100 mL of product, which either forms part of the mandatory nutritional declaration of a product or is available as supplementary information

The declared nutritional values shall be average values, meaning the value which best represents the energy value and amounts of nutrients in each product and reflects allowances for seasonal variability, patterns of consumption and other factors which may cause the actual value to vary.

Through the vitamins they contain, fruits, vegetables and legumes are major contributors to public health and are thus also counted towards the nutritional score. As the food must contain at least 40% for this component (details of the ingredients taken into account in the following parts) to obtain at least 1 positive point in the score calculation, an estimate of the content can be made by using the ingredient list, to the extent that for these products, qualifying ingredients are usually mentioned in the legal denomination of the product (see UAE.S GSO 9 – labelling of prepackaged foodstuffs).

The declared nutritional values shall be determined based one or more of the following methods

- Chemical analysis of the product or its component ingredients through testing. Chemical analysis shall be performed using the official methods of the Association of Official Analytical Chemists (AOAC) taking into consideration the food type/matrix.
- Calculations from generally established and accepted food and beverage nutritional value data sources e.g. USDA FoodData Central, Food Composition System Singapore (FOCOS), FAO/INFOODS Analytical Food Composition Database (AnFood2.0).
- Calculations based on the known or actual nutritional values of the product's ingredients

### **Is testing of products for Nutritional Value Declaration a requirement?**

Evidence of testing the products directly to determine the nutritional values is not essential, however, If the testing is used, it should be conducted by a third-party laboratory based within or outside of the UAE which should hold an accreditation to ISO/IEC 17025 at the time of the testing and test report issuance, where the test

standard or protocol was within the scope of the accreditation. Additionally, the accreditation body which issued the ISO/IEC 17025 accreditation to the laboratory shall be a signatory to the International Laboratory Accreditation Cooperation Mutual Recognition Arrangement (ILAC-MRA). Evidence of the laboratory Accreditation Certification shall be provided as part of the application submission

All test reports submitted shall be no older than 12 months on the day of the application submission. The submitted test report number and test report issuance date shall be provided in the appropriate column of the Abu Dhabi Nutri-Mark Calculation Tool (Microsoft Excel file).

Products may also be submitted directly to the QCC for Nutritional Chemical Analysis testing by contacting the QCC Central Testing Laboratory (CTL) through TAMM, by email through Sample Management Services or visiting the CTL service center at Masdar City, Abu Dhabi.

Products which have previously undertaken Nutritional Chemical Analysis testing through the QCC CTL for determination of the declared nutritional values are exempted from the QCC Surveillance sampling schedule.

## **Nutri-Mark Certification and Licensing Process**

### **Who may display the Nutri-Mark logo on their brands and products?**

License for use of the Nutri-Mark is authorized for producers and distributors of products marketed in Abu Dhabi, United Arab Emirates, after they have completed the certification of specific product models and Licensing process online through the Abu Dhabi Government Services website - TAMM.

### **How do you obtain the right to use the Nutri-Mark?**

The use of the Nutri-Mark is reserved for Operators, individuals or legal entities which are the manufacturers and distributors of Food and Beverage Products sold in the markets of Abu Dhabi. The applicant company for Certification of the products and license for use of the Nutri-Mark should be the legal entity who places the

product in the UAE/Abu Dhabi Market and is therefore responsible for its correct labelling (both under regulatory requirements e.g. UAE.S GSO 9, UAE.S GSO 2233, and for the Front-of-Pack requirements for Nutri-mark).

In the case of imported products, this would typically be the distributor/importer, although some responsibility may be based back to the manufacturer in order to achieve packaging/labelling compliance. We are also working on guidance for use of sticking – post import application of the Nutri-mark, to facilitate application, and will update you on developments of this advice accordingly.

An Operator Company wishing to use the Nutri-Mark on a product(s) must submit an application to the QCC for issuance of a Certificate of Conformity and License to use the Nutri-Mark. The Individual representing the Operator Company applying for the Certificate of Conformity must first create an account with the UAE Pass system in order to access the QCC online Conformity Scheme Services through the Abu Dhabi Government Services website – TAMM. Step-by-step details on the online submission process can be found in the ‘Nutri-mark Application submission guide’.

The Individual representing the Operator Company will be required to link their TAMM account (accessed through the UAE Pass system) to the Commercial License of the Operator Company (the company being registered in the economic zones or free-zones in any of the 7 United Arab Emirates).

The documentation required for submission as part of an application for issuance of a Certificate of Conformity and License to use the Nutri-Mark is detailed in the Certification Scheme for Foods and Beverages using the Nutri-Mark (QCC-Pro-CS-26) and includes:

- A completed and signed ‘Application Form for Product Certification of Food and Beverages using the Nutri-Mark’ (QCC-Pro-AF02), available on the [qcc.gov.ae](http://qcc.gov.ae) website, including completion by signature of the Declaration of Conformity clause and agreement to the Usage Policy for the Nutri-Mark (Nutri-Mark Guideline)

- A valid UAE Commercial/Business License for the Operator company or the UAE industrial license for manufacturer of the product(s) (if manufactured in the UAE). The scope of activities listed in the license should be related to the sale, distribution or manufacture of the Food and/or Beverage products applying
- An authorisation letter issued by the manufacturer and/or product brand owner authorising the applicant company to submit the product(s) for evaluation of conformity by the QCC (if the applicant company is not the manufacturer and/or product brand owner). The Authorisation letter should be issued under the manufacturer/brand owner letterhead and dated within 30 days of the application submission date, signed and stamped by an authorised representative of the manufacturer/brand owner and include sufficient contact details of the signatory (email and phone number) to allow verification of legitimacy
- A power of attorney or authorisation letter issued by the applicant company stating that the individual whom has completed and signed the Product Certification Application Form (QCC-Pro-AF02) is duly authorised to do so. The authorisation letter should be on the applicant company letterhead and signed/stamped by a person holding Power of Attorney for the applicant company, the General Manager or person named on the Applicant Company's Commercial/Industrial License
- Completion of the product information and nutritional content declarations in the Abu Dhabi Nutri-Mark Calculation Tool, available on the [qcc.gov.ae](http://qcc.gov.ae) website

The signatory on the application for issuance of a Certificate of Conformity and License to use the Nutri-Mark may differ from the individual who submits the application through TAMM.



## **What information should be provided for each product model applying to use the Nutri-Mark?**

Each product shall submit sufficient product identification information in order to be identifiable in the Abu Dhabi marketplace including:

- Trade name
- Barcode
- Brand name
- Country of Origin of the Manufacturer or Producer
- Manufacturer or Producer company Name
- Net contents as weight for solid foods, volume for liquid foods and either weight or volume for semi-solid or viscous foods

For non-prepackage foods/beverages and unlabeled loose food items, the barcode information shall be replaced by a retailer/distributor SKU number and Net Contents shall be considered as 100 g or 100 ml as per the calculation of nutritional values.

Each product shall submit evidence of National registration in one or more of the National Electronic Food Registration Portals e.g. 'ATLP', 'ZAD', 'FIRS' or 'ZADI' through the provision of the valid product registration number issued by the Registration Body along with the name of the Registration Body.

All food and beverage products which fall within the scope of the Technical Regulations issued by the UAE Ministry of Industry and Advanced Technology (MoIAT) shall submit the Emirates Quality Mark (EQM) or Emirates Conformity Assessment Scheme (ECAS) certificate number and expiration date for either an EQM or ECAS Certificate of Conformity which lists the product models applying for Nutri-Mark certification and with an expiry date prior to the date of the application submission. This includes Bottled Drinking Water, Juices and Beverages, Milk and Dairy products, Energy Drinks, Honey and products carrying Organic Claims.

## **What are the fees associated with obtaining the Certificate of Conformity and the right to use the Nutri-Mark?**

Each application for certification of products to receive the right to bare the Nutri-Mark will be charged 700 AED (comprising 600 AED Application Submission Fee and 100 AED Certificate Issuance Fee).

Each product category as defined by the Scheme Scope; a) General Foods, b) Red Meat, c) Cheese, d) Fats, Oils, Nuts and Seeds, and e) Beverages must be submitted as a separate application by an applicant company and is subject to a separate application submission and validation fee. The number of product models that can be submitted in each application is unlimited, as long as all product fall within the same product category of a-e above.

Each product that achieves successful certification will be listed on the Certificate of Conformity issued by the QCC alongside the information pertaining to identification of the product (Name, Barcode/sku, Brand, Country of origin, Manufacturer or producer, Net contents) and the Nutri-Mark rating (A-E) calculated based on the declared nutritional values provided in the Abu Dhabi Nutri-Mark Calculation Tool (Microsoft excel file).

Issuance of the License for a company to use the Nutri-Mark on their products is free of charge. Once a company has been issued a License it will be valid for 3 years and cover all subsequent Certifications issued to the company during this period.

To add new product(s), remove existing product(s) to the Certificate of Conformity, or amend the details for an existing model listed in a Certificate, the applicant should submit an application through the TAMM website including submission of all required documentation. Applications for changes to the Certificate of Conformity (addition/removal/amendment of products) will incur the standard 700 AED service fee.

## Graphic Guideline for Use of the Nutri-Mark

A graphic guideline accessible online defines the rules (sizes, placements, etc.) to affix the Nutri-Mark on food packages. Except for some specific cases the Nutri-Mark should be affixed to the front-of-package. It is not allowed to replace the Nutri-Mark with a QR code and display the Nutri-Mark only online.

Use of stickering, e.g. application of the Nutri-Mark to the product front-of-package after printing of the packaging, is currently authorized (at the discretion of the Abu Dhabi Government and subject to change with suitable notice) so long as the use of stickering complies with the graphic guidelines.

High-resolution image files for the Nutri-Mark labels will be provided to the recipients of the Certificate of Conformity and License to use the Nutri-Mark upon successful completion of the certification process.

### **Is any approval required before you can start applying the Nutri-Mark to products?**

Products must first be submitted for Certification and the Certificate of Conformity + License for use of the Nutri-Mark issued to obtain the right (license) to use the Nutri-mark. Once the certificate is issued with the final Nutri-Mark rating for each product, it is up to the Licensed company/manufacturer to apply the Nutri-Mark to the product using the official Graphic Guidelines. You can also contact the QCC Marketing and Communications department to provide mock-ups of the use of the Nutri-Mark on you products and confirm if they are compliant, before printing/applying the final version. Obtaining this approval is not mandatory, i.e., once you have obtained certification and the license to use the Nutri-mark, you can proceed directly to start applying it to Certified products. Any miss-use of the mark if identified in the Abu Dhabi market will be dealt with directly by the QCC in coordination with market inspectors and the Department of Economic Development.

## **How to display Nutri-Mark for assortments?**

When the nutritional values of packs containing assortments are different, one Nutri-Mark for each nutritional declaration must be displayed.

In the event that the nutritional score calculations for each of the assortments produce the same Nutri-Mark result, a single Nutri-Mark can be displayed on the front (e.g. in the case of a multi-pack yoghurt with different flavours or products with one average nutritional statement)

If this is an assortment where a person is expected to consume the entire product, an average Nutri-Mark can be calculated. If components of an assortment belong to groups with different calculation rules (for example solid food with a beverage), in this situation multiple Nutri-Marks must be presented.

## **What are the rules for use of the Nutri-Mark in e-commerce sites?**

For digital use of the Nutri-Mark, the size of the logo is not set and it is not subject to the proportionality rules for packages. However, it is important to ensure the logo remains legible. The other conditions for using the logo on e-commerce sites are the same as those required when products are sold in shops.

## **Can the Nutri-Mark be used for promotional purposes?**

The rules for using the Nutri-Mark for sales communications and promotions are detailed in the graphic guideline available online. In these cases, the Nutri-Mark licensee can choose to include the communication logo only (without emphasis on one of the letters A, B, C, D, E). If the Nutri-Mark is displayed on the front of the packaging, it is possible to add an explanation of the Nutri-Mark at the back of the packaging. The information provided there must only mention elements related to the score calculation. It should not mention other information related to additives or preservatives for instance, which could give the impression that these components are part of the calculation.

## **Should the Nutri-Mark be applied to outer-carton packaging?**

Outer-carton packaging for transportation is typically not displayed or visible to the consumer at point of sale and so does not require use of the Nutri-Mark logo.

## **What are the Terms and Conditions for the use of the Nutri- Mark?**

Terms and conditions for the use of the Nutri-Mark are given in the document 'General Requirements for Product Certification through after-market testing (Type 2) QCC-PRO-RQ02'. This document details the duties of the company recipient of the Certificate of Conformity and License for use of the Nutri-Mark as well as duties and responsibilities of the Abu Dhabi Quality and Conformity Council in relation to the Nutri-Mark Certification and Licensing.

## **Regulatory scope of the Nutri-Mark**

### **Is the European Nutri-score recognized as equivalent to Nutri-Mark?**

While both the Nutri-Score system and Nutri-Mark system follow the same calculation algorithm for determining the product Grade/Mark applied, the still have fundamental differences in how the systems are administered. For example, the Nutri-Mark scheme required certification of the product information, and products carrying the Nutri-Mark will be subjected to in-market sampling and testing for compliance with the declared nutritional values, which is currently not the case for products carrying the Nutri-Score Label.

To facilitate low-impact of introduction the Nutri-Mark scheme within the Abu Dhabi market, equivalency with the Nutri-Score system, and mutual recognition between the two Marks is currently being investigated.

### **Is the Nutri-Mark Label recognized in the other UAE Emirates and the GCC?**

Currently the Nutri-Mark is only launched as an initiative to inform and improve the health choices of the general population of Abu Dhabi Emirate. At present there are no fundamental restrictions for use of the Nutri-Mark on products retailed in the

other Emirates, or in the GCC. However, it should be noted that the guidance of the Codex Alimentarius with regards to Front-of-pack Nutritional Labelling (FOPNL) (Guidelines on Nutritional Labelling CXG 2-1985) is for Governments in each country to recommend only one FOPNL system. In this respect, the Government of Abu Dhabi is actively advocating for the adoption of the Nutri-Mark scheme at the National (UAE) level, and for further adoption at the GCC level through the appropriate regulatory channels (Ministry of Industry and Advanced Technology and Gulf Standards Organization accordingly).

## Specific Calculation Questions

### Liquid Foods calculation

With liquid foods such as soups or oils, the value used is the one given as a unit on the mandatory nutritional declaration, and not a unit that is not written on the packaging (to ensure transparency for the consumer). If two values are mentioned (per 100 g and per 100 mL), per 100 g is to be taken into account.

### Can the Nutri-Mark be applied to Recipes?

In the case of recipes, for example in magazines, apps or in promotional material, the Nutritional score calculation is based on the quantities and nutritional values of the various ingredients that constitute the dish, once the ingredients that require cooking have been cooked (i.e., nutritional values for the ingredient as consumed). In the event that an ingredient's nutritional values are unavailable (raw products, for example), the values listed in international food composition database shall be referred to instead. Nutritional values of such ingredients shall then be calculated using a rule of proportionality based on data found in the composition database. Nutritional values of the entire recipe should take into account the ingredients once cooked, i.e., with a consideration for the yield of the ingredient within the recipe. Once the nutritional values for the recipe have been computed, the Nutri-mark algorithm for general foods should be used through the calculation tool (excel file) available through the QCC website can be used.

The list of ingredients used in the recipe, and their respective quantities, must be clearly indicated. A table of the recipe's nutritional values must be presented.

### **What counts as a simple sugar?**

Simple sugars include mono- and disaccharides

### **How is the salt – sodium conversion calculated?**

The sodium content corresponds to the salt content listed in the mandatory declaration divided by a conversion coefficient of 2.5.

### **Which method shall be used for assessing fibre content?**

All methods for determination of the fibre content declared on the nutritional declaration as listed in the European guidance document<sup>1</sup> for methods of analysis for determination of the fibre content declared on a label, are valid for the calculation of the score.

### **What reference is used to calculate the content of ‘Fruits, vegetables and legumes’ in processed products?**

The calculation of the product content of ‘Fruits, vegetables, legumes and nuts, and rapeseed, walnut and olive oils’ is based on the ingredient list.

The amount of fruits and vegetables in the product (g per 100 g) can be calculated before or after cooking. However, when calculating the quantity of fruits and vegetables in a composite food, all the ingredients should be in the same state – either raw or cooked.

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<sup>1</sup> [https://food.ec.europa.eu/system/files/2016-10/labelling\\_legislation\\_guidance\\_methods\\_2012\\_en.pdf](https://food.ec.europa.eu/system/files/2016-10/labelling_legislation_guidance_methods_2012_en.pdf)

## Calculation On Product As Sold Vs. As Consumed

### **Does the product's Nutri-Mark need to be calculated based on it's nutritional score as sold or once it's prepared?**

A product nutritional declaration may be based on the nutritional values as sold or, when appropriate, as prepared. In any case, the Nutri-Mark's calculation has always to be based on the energy and the nutrients indicated on the corresponding nutritional declaration. In addition, the calculation of the Nutri-Mark on the prepared product can only be considered if there are sufficient details on the preparation method.

For these products, it is recommended to calculate the Nutri-Mark for the product as prepared, to allow consumers to be able to compare the Nutri-Mark on the same basis. To be eligible for this calculation method, the packaging must affix the nutritional declaration for 100 g or 100 mL of prepared product and the food's preparation method has to be described in detail. Products covered by this calculation method are those to be reconstituted, but not those included in a recipe. An example of a product that is covered by this method of calculation is dehydrated powdered soups.

Note: for products intended to be reconstituted with milk, if the type of milk is not indicated, then semi-skimmed milk should be considered the default.

### **How is the Nutri-Mark calculated for fried products?**

Pre-packaged fried products (such as chips or breaded fish) will normally have undergone an industrial pre-frying process that has a low impact on the amount of fat in the product.

Some products may be designed for cooking in an oven or frying pan, whereas other packaging may mention that it can be cooked in a deep-fryer, which leads to a far greater quantity of oil in the final consumed product. As a result, cooking in a deep-fryer translates to a Nutri-Mark that is one or two letters higher, depending on the type of oil used.



In the exclusive case of fried products that cannot be eaten as sold and where the packaging indicates a deep-fryer as a cooking method, it is recommended that the producer inform consumers of the changes such a preparation method would cause in terms of the product's Nutri-Mark, by adding the following generic sentence to the packaging: 'The process of deep-frying will worsen the product's Nutri-Mark by one or two letters.'

### **How is the Nutri-Mark calculated for the product with a covering liquid?**

The nutritional score is calculated using the nutritional data listed on the package for 100 g of the product, whose nutrients form part of the mandatory nutritional declaration or are included as supplemental information, in accordance with UAE food labelling standards.

If the covering liquid is taken into account in the mandatory nutritional declaration, the Nutri-Mark should also be calculated for the product + the covering liquid and vice versa. If the covering liquid is taken into account, the 'Fruits, vegetables, legumes, nut and oils' calculation should include it. If the nutritional values do not take the covering liquid into account, then it should be recalculated without the covering liquid.

### **How are composite products calculated?**

In the case of a prepared dish sold with a sauce packet that displays the nutritional values of the dish + sauce, the Nutri-Mark should also be calculated for the dish + sauce.

If two nutritional statements are provided, two Nutri-Marks may be displayed on the front – there is a Nutri-mark graphic guideline available for displaying 2 Nutri-Scores on the front of the packaging.

## Definition Of the Product Categories

The first step to determination of the products' Nutri-Mark is to identify the food/beverage group to which it belongs. The majority of products belong to the **General Food** group unless they meet the criteria of the alternate categories; **Cheese, Red Meat, Beverages, Animal/Vegetable Fats, Nuts and Seeds.**

### Which products are categorized as cheeses?

The following products are considered cheeses

- Cheeses
- Processed cheeses
- Cheese specialties
- Cheese or cheese preparations (breaded or marinated) intended to be grilled or baked

The following are not considered cheese for the purposes of calculating the Nutri-Mark and thus fall under the General Foods category.

- Quark
- Plant-based cheese alternatives

If cheese is incorporated into a composite product in the General Foods category, it be included in the overall score for the product using the information from the nutritional declaration for 100 g of the food. Composite products are considered in their entirety as a mixture of ingredients. The score applies to the final mixture. Therefore, cheese, is not considered separately when included in a recipe.

### Which products are categorized as added fats?

'Added fats' refer to fats sold as finished products, not to fats used as ingredients in a composite product. For instance, the following are considered added fats: vegetable oils, margarines, butter, cream or dairy products used as added fats such as 'creme fraiche'.

Plant-based preparation for cooking (for instance made of soya, coconut, etc), as well as whipped cream should be considered as added fats. Coffee cream is not considered as added fat, but as beverage. Condensed milk is not considered as added fat but as general food.

Cold-emulsified sauces, such as mayonnaise or cocktail sauce, are not covered under the Added Fats category.

Cream used in a composite product (or butter, sunflower oil, etc.) will be included in the overall score for the product, using the information from the nutritional declaration for 100 g of the food. Composite products are considered in their entirety as a mixture of ingredients, including any fats. The score applies to the final mixture.

### **Which products are categorized as beverages?**

The Nutri-Mark category of Beverages applies to the following products if they include a nutritional declaration, except bottled waters for which a default Nutri-Mark rating of 'A' / dark green can be displayed without mandatory nutritional declaration:

- Mineral water, table water and spring water (default Nutri-mark 'A')
- Flavoured water (with and without added sugars). This category is different from mineral water and spring water and cannot receive a Nutri-Mark 'A'
- Fruit juices, nectars and smoothies
- Vegetable juices
- Drinks with added sugar and/or sweeteners
- Teas, infusions or coffee reconstituted exclusively with water
- Lemon juices, concentrated or not, used for culinary purpose or as drink after dilution
- Milk drinkable yoghurt, un-flavoured, flavoured or chocolate milk beverages whatever their % content in milk
- Coffee Cream
- Plant-based drinks

Soups and gazpacho, however, are still considered as foods, and sweeteners for hot beverages are not considered beverages for the purposes of calculating the Nutri-Mark.

### **Which products are categorized as red meat and products thereof?**

Red meat products are identified in the literature as typically products from mammalian muscles. Thus, with some exceptions (listed below), meat from birds or amphibians are excluded from this category.

Products designated in the Red Meat category of the purpose of the Nutri-Mark are defined using international classifications of food products, either using the Harmonized System Nomenclature, or the Codex Alimentarius/FAO classifications.

Regarding the Codex Alimentarius classifications, the entire group 08.0 (Meat and meat products, including poultry and game and all its subgroups) is relevant, though not all food items in the individual sub-groups are included, only those containing red meat.

In the Harmonized System Classification, the following codes correspond to red meat for the purpose of Nutri-Mark categorization:

Beef:

- 0201 Meat of bovine animals, fresh or chilled
- 0202 Meat of bovine animals, frozen

Pork:

- 0203 Meat of swine, fresh, chilled or frozen

Lamb:

- 0204 Meat of sheep or goats, fresh, chilled or frozen

Horse:

- 0205 Horse and equine meat

Game and venison:

- 0208903000 Of game, other than of rabbits or hares
- 02089060 Fresh, chilled or frozen reindeer meat and edible offal thereof

Offals and processed meat (as red meat):

- 0206 Edible offal of bovine animals, swine, sheep, goats, horses, asses, mules or hinnies, fresh, chilled or frozen
- 0210 Meat and edible offal, salted, in brine, dried or smoked; edible flours and meals of meat or meat offal
- 1601 sausages
- 1602 Prepared or preserved meat, meat offal, blood or insects (excl. sausages and similar products, and meat extracts and juices)
  - All those from swine, lamb or beef even as mixtures

Ostrich meat is also considered in the red meat category

### **Foods to be potentially evaluated within the red meat category**

The red meat category applies to products in which the main/first ingredient is meat. In other words, the red meat algorithm applies to products which have or can have the role of the meat component on a plate or in a dish:

- meat (e.g. fresh meat, seasoned meat, cooked meat in sauce)
- meat products (e.g. minced meat, meat ball, sausage)

More formally, those are the foods in the groups 13 and 14 of the WHO EURO Nutrient Profile Model<sup>2</sup> (meat and meat products) and some food products from group 9 (meat-based tinned foods).

The following clarifications are not intended to replace the definitions of the WHO groups, but to make it easier to understand and apply the rules for categorizing products as ‘red meat’ by proposing concrete examples for the different types of products.

Group 13: Fresh and frozen meat, poultry, game, fish and similar products.

Group 14: Processed meat, poultry, fish and similar products.

Within these groups, the categorization of red meat within the scope of Nutri-Mark applies to the following products:

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<sup>2</sup> <https://www.who.int/europe/publications/i/item/WHO-EURO-2023-6894-46660-68492>

- 14 d. Raw meat products and preparations. (Unprepared raw meat, minced meat products and fresh sausages. This includes marinated, flavoured, moisture-enhanced and breaded meat products) Examples: minced meat, fresh Strasbourg sausage, Rohwurst, etc.
- 14 e (i). Whole muscle meat products, heat treated (frozen and tinned products). (Frozen and tinned whole muscle (e.g., beef, lamb, chicken and turkey)). Frozen and appertized (including sterilization) Prepared meat products at room temperature (excluding products not concerned) Examples: Frozen beef ribs, frozen leg of lamb, pork tenderloin, beef tournedos, etc.
- 14 e (ii). Whole muscle meat products, heat treated (refrigerated products). (Refrigerated whole muscle (e.g., beef, lamb, chicken and turkey)). Examples: lamb chop, roast beef, fillet of beef, etc.
- 14 f. Whole muscle meat products, non-heat preservation. Air-dried, cured, entire pieces of meat (e.g. Parma ham and Serrano ham). Brined meat products (e.g. pastrami and bacon).
- 14 g. Comminuted meat products, heat treated (cooked). All types of cooked minced meat products, whether sterilized or not. (Cooked sausages (excluding hot dogs), cooked meat loaf balls, corned beef, luncheon meats and pâté (includes tinned sausages and luncheon meats).
- 14 h. Comminuted meat products, non-heat preservation. (Air-dried, cured and/or fermented sausages). Examples: pepperoni, chorizo, sausage, salami, jerky and biltong , etc.

Group 9: 9 a Tinned foods: meatballs in sauce and curries

### **Foods excluded from the red meat category**

Examples from WHO group 9 products that do not fall into the red meat category with respect to the Nutri-Mark:

- 9 a. Tinned foods. (Shelf-stable vegetarian and meat chilli, stew and baked beans and refried beans. Examples: Ragouts, Chilis, etc
- 9 b (i)/ 9 b (ii). Pasta, noodles and rice or grains with sauce or seasoned (prepared, dry-mix or concentrated). (Shelf-stable, frozen and refrigerated products. Ready-to-serve pasta, noodles and rice or grain mixes with sauce or seasonings (e.g., macaroni with cheese sauce, noodles in tomato sauce and teriyaki noodles). Dry-

mixes for shelf-stable pasta, noodles and rice or grain mixes with sauce or seasonings sold in concentrated form (e.g., macaroni with cheese sauce, noodles in tomato sauce and teriyaki noodles). Includes instant noodle with soup or seasonings.). Examples: Meat stuffed pasta, veal stir-fry with side dish, lasagne.

- 9 c. Pizza and pizza snacks. (Frozen and refrigerated pizza, pizza snacks and calzones. Examples: Pizzas, calzones

- 9 d. Sandwiches and wraps. (Frozen and refrigerated sandwiches, wraps, burritos, tacos, enchiladas, hamburgers and hot dogs). Examples: Hamburger, hot dog, tacos, burritos, etc.

- 9 e. Prepared salads. (Frozen and refrigerated prepared salads (e.g., potato salad, coleslaw, pasta salad, vegetable salad, bean salad, couscous and rice salad)). Examples: Vegetable and/or cereal-based salad with meat (beef, pieces of beef, etc.)

- 9 f. Ready-to-eat meals composed of a combination of carbohydrate and either vegetable or meat or all three combined. (Frozen and refrigerated dinner entrées, meal sides, meal centres and appetizers.) Examples: “Boeuf bourguignon”, “Poulet Basquaise”, Stuffed vegetables, Tarts, etc.

- 9 g (i) / 9 g (ii). Soups (ready-to serve, tinned, refrigerated soups and dry soup (concentrated). Tinned and refrigerated, ready-to serve broth and broth-based soup, Dried broth and broth-based soup (concentrated).

Sauces containing meat (e.g. Bolognese sauce) are not affected by the specific rule. This is because the aim of the Nutri-Mark is to enable products to be compared within the same category/shelf, and these products are primarily sauces: the main ingredients are the sauce base, while meat represent a small proportion of the product.

On the other hand, products characterized by a higher meat content and a sales name that identifies them as meat (e.g. Meatballs in sauce) are affected by the specific rule. The red meat algorithm is to be applied if the red meat proportion is  $\geq 20\%$  in meat and meat products (as defined above).

## Which products are categorized as animal and vegetable fats, nuts and seeds category?

This category includes fats and oils from plant or animal sources, including cream, margarines, butters and oils. Additionally, the following products are included in this category, using the Harmonized System Nomenclature codes<sup>3</sup>:

- Nuts: 0801 0802
- Processed nuts: 200811 200819 (> 50% nuts to qualify)
- Ground nuts: 1202
- Seeds: 1204 (linseed) 1206 (sunflower) 1207 (other seeds)

Of note chestnuts are excluded from the category.

The detailed list of the Harmonized System Nomenclature, classifying nuts is detailed below:

08.01 Coconuts, Brazil nuts and cashew nuts, fresh or dried, whether or not shelled or peeled.

- Coconuts: 0801.11 -- Desiccated / 0801.12 -- In the inner shell (endocarp) / 0801.19 -- Other

- Brazil nuts: 0801.21 -- In shell / 0801.22 -- Shelled

- Cashew nuts: 0801.31 -- In shell / 0801.32 -- Shelled

08.02 Other nuts, fresh or dried, whether or not shelled or peeled.

- Almonds: 0802.11 -- In shell / 0802.12 -- Shelled

- Hazelnuts or filberts (*Corylus* spp.): 0802.21 -- In shell / 0802.22 -- Shelled

- Walnuts: 0802.31 -- In shell / 0802.32 -- Shelled

- Pistachios: 0802.51 -- In shell / 0802.52 -- Shelled

- Macadamia nuts: 0802.61 -- In shell / 0802.62 -- Shelled

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<sup>3</sup> <http://www.wcoomd.org/en/topics/nomenclature.aspx>  
<https://www.wcoomd.org/en/topics/nomenclature/instrument-and-tools/hs-nomenclature-2022-edition/hs-nomenclature-2022-edition.aspx>  
<https://www.tariffnumber.com/2023/>



- Kola nuts: (Cola spp.) 0802.70
- Areca nuts: 0802.80
- Other: 0802.91 -- Pine nuts, in shell 0802.92 -- Pine nuts, shelled 0802.99 – Other
- Pecans: 08029910

Concerning the category of processed nuts, the Harmonized System Nomenclature list is reported below:

- Nuts, ground-nuts and other seeds, whether or not mixed together:

2008.11 -- Ground-nuts

2008.19 -- Other, including mixtures

All processed or mixed products based on nuts with an amount > 50% (like spreadable product: peanuts butter) are taken in account.

The detailed list of the Harmonized System Nomenclature, classifying seeds is detailed below:

12.02 Ground-nuts, not roasted or otherwise cooked, whether or not shelled or broken.

1202.30 - Seed - Other : 1202.41 -- In shell 1202.42 -- Shelled, whether or not broken

12.04 1204.00 Linseed, whether or not broken

12.06 1206.00 Sunflower seeds, whether or not broken.

12.07 Other oil seeds and oleaginous fruits, whether or not broken: Palm nuts and kernels; Cotton seeds; Castor oil seeds; Sesamum seeds; Mustard; Safflower (*Carthamus tinctorius*) seeds; Melon seeds & other; Poppy seeds; Other

Can be considered as Other: Chia seeds; Pumpkin seeds; Hemp seeds; Pine nuts.

All processed or mixed products based on seeds with an amount > 50% (like spreadable product: tahini) are taken in account.

Products from an ingredient qualifying in the nuts & seeds list (like flour or powder) qualify as nuts & seeds as well.

All processed and/or mixed products with a total amount of nuts and/or seeds > 50% are categorized in the 'animal and vegetable fats, nuts and seeds' category. The

proportion of vegetable oils that might have been added to these products is not taken into account in the question of the allocation of the product to this category.

Coconut (all edible parts: fresh coconut flesh, coconut cream, coconut milk, desiccated and dried coconut) excluding coconut water and coconut drinks (considered as beverages) as classified by the harmonized system is to be considered in the 'animal and vegetable fats, nuts and seeds' category. Therefore, coconut water is not included in the 'Fruit, vegetables and legumes' category.