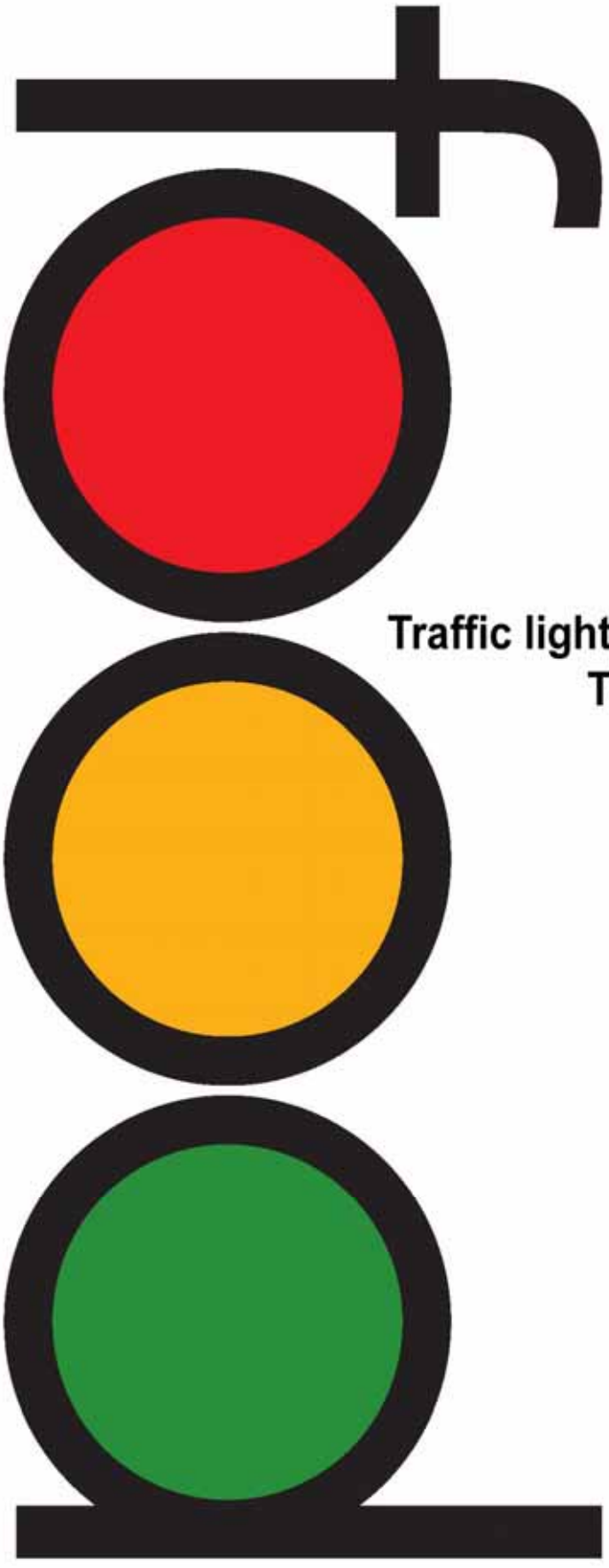


FOOD STANDARDS AGENCY

Front-of-pack Traffic light signpost labelling Technical Guidance

Issue 2 November 2007

There is a new labelling system on food. It tells you the levels of sugars, fat, saturated fat and salt.

Red means high.

Amber means medium.

Green means low.

The Food Standards Agency. Helping you make healthier choices.

eatwell.gov.uk/trafficlights

Front of Pack Traffic Light Signpost Labelling - Technical Guidance

This document replaces Issue 1 of the Food Standards Agency's front of pack nutritional signpost labelling technical guidance. This guidance has been re-issued to include criteria for breakfast cereals and to incorporate a modification to the sugars red (high) criteria which is intended to help consumers better identify foods which are healthier options, for example those where the sugars content is due to high levels of fruit. These changes are detailed in section 2. This guidance will be updated again following the formal traffic light signposting criteria review which will be carried out during 2008.

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

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

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

- **separate information on fat, saturated fat, sugars and salt;**
- **red, amber or green colour coding to provide at a glance information on the level (i.e. whether high, medium or low) of individual nutrients in the product;**
- **provision of additional information on the levels of nutrients present in a portion of the product; and**
- **use of the nutritional criteria as set out in this document to determine the colour banding.**

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

In addition:

- Information on Guideline Daily Amounts (GDAs) and calories can be provided[3].
- The signpost should clearly indicate if information on the levels of nutrients present in a portion is as sold or as consumed.
- Any other front of pack logos used to communicate messages about beneficial nutrients in the food, such as calcium, iron or fibre must comply with legislative requirements, and should be separate from the signpost bearing information about fat, saturated fat, sugars and salt.

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

[3] If information on calories is provided, the Agency recommends this is done in a neutral colour. If companies choose to colour code calories then the Agency recommends 'green' reflects the criteria for 'low energy' set out in European Regulation (EC) No 1924/2006 on nutrition and health claims;
http://eurlex.europa.eu/LexUriServ/site/en/oj/2007/l_012/l_01220070118en00030018.pdf

1. Scope of approach

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

- **Sandwiches, wraps, filled baguettes and similar products**
- **Prepared or ready meals, whether hot or cold (for example pasta salad bowls, prepared salad meals such as chicken caesar salad and prepared dishes sold with and without accompaniments such as rice, noodles, vegetables, potato or similar)**
- **Burgers, sausages**
- **Pies, pasties and quiches**
- **Breaded or coated or formed meat, meat alternative, poultry, fish and similar products including those in sauces (for example chicken nuggets, fish fingers, chicken kiev, fish in parsley sauce, meat balls, lamb grills)**
- **Pizzas**
- **Breakfast cereals**

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

2. The colour code

2.1 How the nutritional criteria were developed

The green/amber (low/medium) boundaries are determined by the European Regulation (EC) No 1924/2006 on Nutrition and Health Claims, which came into effect on 1 July 2007[4].

The amber/red (medium/high) boundaries are based on existing advice from COMA and SACN for fat, saturated fat, sugars and salt using 25% of recommended intake levels per 100g and 30% (40% for salt) per portion[5].

In view of the fact neither COMA nor SACN has provided advice on intakes of total sugars an expert group was set up to recommend suitable criteria based on total sugars[6].

Further work has been undertaken to develop suitable sugars criteria for breakfast cereals[7,8]. Consumer research on breakfast cereals confirmed that consumers expect the colour code and the nutritional information per portion for breakfast cereals to be based on dry weight of cereal and that they wanted to be able to distinguish at a glance between breakfast cereals which are high in added sugars and those high in sugars due to high fruit content. A technical working group was subsequently set up to advise on the criteria for the sugars colour code in the case of breakfast cereals, which recommended that it should be based on added sugars and that additional on pack text, discrete from the traffic light signpost, should be provided to highlight the presence of sugars from fruit and / or milk not included in the colour code[9]. This approach is in line with COMA advice.

To ensure the consistency and clarity of the approach it was also recommended that this approach be applied to all the recommended traffic light signposting categories. The traffic light signpost labelling Adopters and Supporters agreed this change with immediate effect in the case of newly traffic light labelled products, and in the case of existing products with traffic light labels, when the labels are next re-printed.

[4] http://eur-lex.europa.eu/LexUriServ/site/en/oj/2007/l_012/l_01220070118en00030018.pdf.
[5] Department of Health. Report on health and social subjects No. 41. Dietary reference values for food energy and nutrients for the United Kingdom. London : HMSO, 1991
[6] http://www.food.gov.uk/foodlabelling/signposting/signposttimeline/rationalesugars/
[7] http://www.food.gov.uk/foodlabelling/signposting/sugarslabcereals
[8] http://www.food.gov.uk/multimedia/pdfs/cerealportion.pdf
[9] DN: insert weblink to working group paper

2.2 Nutritional criteria

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

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

	Green (Low)	Amber (Medium)	Red (High)	
Fat	≤ 3.0 g/100g	> 3.0 to ≤ 20.0 g/100g	> 20.0 g/100g	> 21.0g / portion
Saturates	≤ 1.5 g/100g	> 1.5 to ≤ 5.0 g/100g	> 5.0 g/100g	> 6.0g / portion
Sugars[10]	≤ 5.0 g/100g	> 5.0 to ≤ 12.5g/100g	> 12.5g/100g	> 15.0g / portion
Salt[11]	≤ 0.30 g/100g	> 0.30 to ≤ 1.50g/100g	> 1.50 g/100g	> 2.40g / portion[12]

The colour code for sugars is determined in terms of both the total and added sugar components as follows[13]: -
Green if **total sugars** are less than or equal to **5g/100g**.
Amber if **total sugars** exceed **5g/100g** and **added sugars** are less than **12.5g/100g**.
Red if **added sugars** are more than **12.5g/100g**.

In addition to the per 100g criteria, there are 'per portion' criteria for food. The per portion criteria ensure that any food which contributes more than 30% (40% for salt) of an adult's recommended daily maximum intake for a particular nutrient is labelled red (high)[14].

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

- dried foods, which should be assessed 'as reconstituted', for example dried noodle meals.
- where all the nutritional labelling on pack, including group 2 nutritional labelling, is provided as consumed, then the colour code for front of pack labelling can also be assessed on an 'as consumed' basis **provided** this is clearly stated.

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

[10] The Agency has asked SACN to review and advice on intakes of sugars as part of its future work programme.
[11] Sodium from all sources expressed as salt.
[12] To be reviewed in 2008 to reflect progress on salt reduction work.
[13] For the purposes of the Agency's front of pack nutrition signpost scheme, added sugars is defined as any mono- or disaccharide or any other food used for its sweetening properties. This would include, but is not exclusively limited to: sucrose, fructose, glucose, glucose syrups, fructose-glucose syrups, corn syrups, invert sugar, honey, maple syrup, malt extract, dextrose, fruit juices, deionised fruit juices, lactose, maltose, high maltose syrups, Agave syrup, dextrin and maltodextrin. The sugars contained in dried fruit are assumed to be intrinsic and are not included as added sugars. The sugars in milk powder are not included as added sugars, in line with COMA dietary guidelines which deemed sugars in milk as a special case and did not set guidelines to limit their intake.
[14] From 2008 the per portion criteria will apply to all foods over 100g. Until then the per portion criteria may be used if the serving size is 250g or greater.

Table 2 – Drinks (per 100ml)

	Green (Low)	Amber (Medium)	Red (High)
Fat	≤ 1.5 g/100ml	> 1.5 to ≤ 10.0 g/100ml	> 10.0g/100ml
Saturates	≤ 0.75 g/100ml	> 0.75 to ≤ 2.5 g/100ml	> 2.5g/100ml
Sugars	≤ 2.5 g/100ml	>2.5 to ≤ 6.3 g/100ml	> 6.3g/100ml
Salt[11]	≤ 0.30 g/100ml	> 0.30 to ≤ 1.50g/100ml	> 1.50g/100ml

The colour code for sugars is determined in terms of both the total and added sugar components as follows: -
Green if **total sugars** are less than or equal to **2.5g/100ml**.
Amber if **total sugars** exceed **2.5g/100ml** and **added sugars** are less than **6.3g/100ml**.
Red if **added sugars** are more than **6.3/100ml**.

2.3 How to apply the nutritional criteria to assign the traffic light colour code

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

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

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

Step 3: For foods, if any nutrient meet the red (high) per portion criteria it must be labelled red (high), regardless of its per 100g profile.

Some worked examples are attached at Appendix 3 which illustrate how to arrive at the correct colour coding for each nutrient.

Sugars

Additional text is also required on pack, which is discrete from the signpost, to highlight to the consumer when a product is colour coded amber and also contains sugars from fruit and or milk which are not included in the colour code. It is recommended that "contains naturally occurring sugars", which reflects the requirements in the Nutrition and Health Claims Regulation for "no added sugars" claims is used.

A flow chart is attached at Appendix 2 to illustrate how to calculate the sugars colour code together with examples of suitable wording for the additional text.

3. Front of pack labelling per serving information

Information given in the signpost on the levels of nutrients present in a portion of a product should not be misleading and be based on **realistic** portion sizes. Where possible, generally accepted portion sizes should be used. Details of portion size used must be indicated clearly on the product packaging, for example ½ a packet, one burger. In the case of breakfast cereals this information should be provided on a dry weight basis.

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

Information about the amount of **total sugars** in a portion is required to be given on the signpost.

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

Appendix 1

Synopsis of design

The Agency is not seeking to determine the design of individual approaches, but to provide advice on design issues as a starting point for those who may wish to use it. The following information is based on the visuals the Agency used during its consumer research and is intended as a guide. However the information provided in the signpost, including the portion size, must be clear and not misleading.

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

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

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

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

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

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

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

- The minimum font size that should be used is 4 point.

Signpost position

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

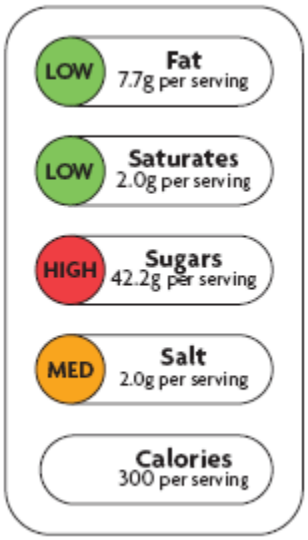
- Position the signpost in the same field of vision as the product fancy, brand or trade name, and if possible in a place consistent with use in other labels. Take care to ensure that the text is not distorted.

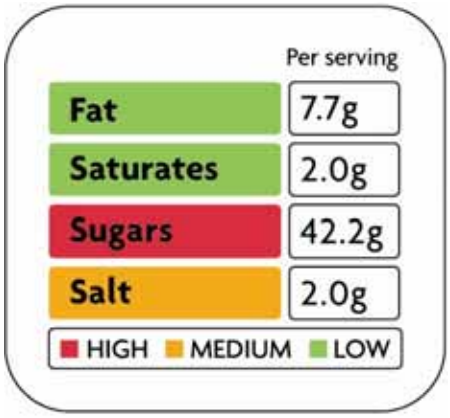
- In the case of multi-pack products or selection packs, place the signpost on the outer packaging. It can also be repeated on individual products.

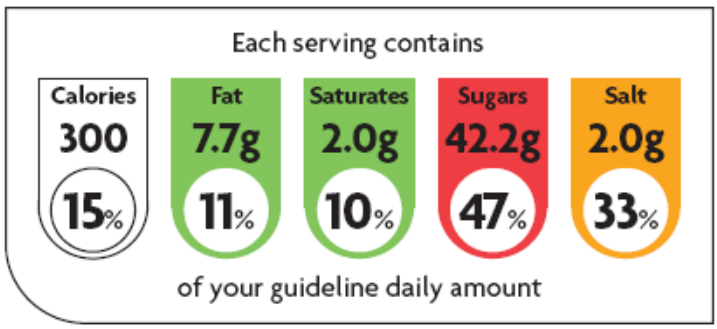
- Do not place images behind the signpost (watermarking).

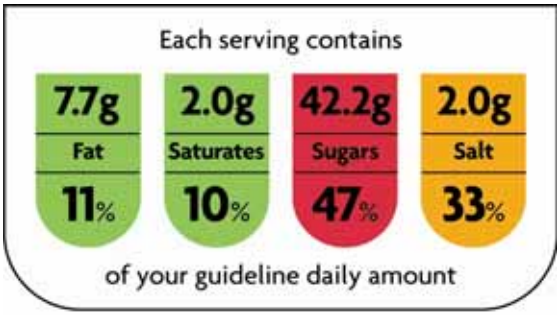
Exemplar signpost formats

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









Appendix 2

Nutritional criteria for sugars
The colour code for sugars for food products is determined in terms of both the total and added sugar components as follows: -
Green if total sugars are less than or equal to 5g/100g.
Amber if total sugars exceed 5g/100g and added sugars are less than 12.5g/100g.
Red if added sugars are more than 12.5g/100g.

For the purposes of the Agency's front of pack nutrition signpost scheme, added sugars is defined as any mono- or disaccharide or any other food used for its sweetening properties. This would include, but is not exclusively limited to: sucrose, fructose, glucose, glucose syrups, fructose-glucose syrups, corn syrups, invert sugar, honey, maple syrup, malt extract, dextrose, fruit juices, deionised fruit juices, lactose, maltose, high maltose syrups, Agave syrup, dextrin and maltodextrin.

The sugars contained in dried fruit are assumed to be intrinsic and are not included as added sugars. The sugars in milk powder are not included as added sugars, in line with COMA dietary guidelines which deemed sugars in milk as a special case and did not set guidelines to limit their intake.

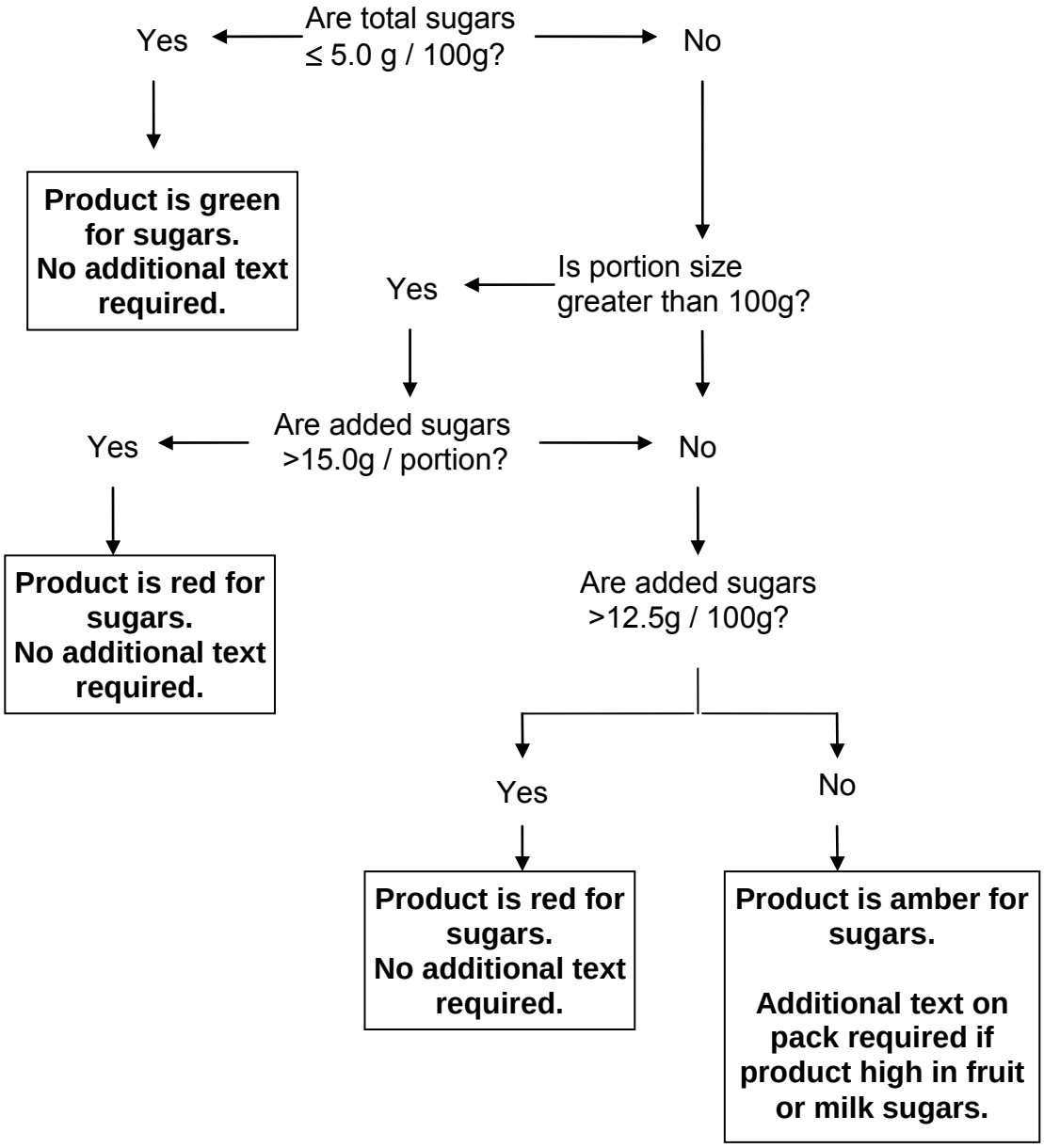
Examples of accompanying text to appear on packet if the product is high in sugars from fruit and or milk but is colour coded amber.

"This product has no added sugars but contains naturally occurring sugars."

"The colour code reflects the amount of added sugars present. This product also contains naturally occurring sugars from the fruit."

"Contains naturally occurring sugars"

Flow chart to illustrate how to apply sugars criteria



Appendix 3

Worked examples using the Agency's nutritional criteria

Product 1 – Ready meal

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

- As this is a food product, Table 1 will be used to determine the signpost.
- The total sugars does not exceed 5g, therefore colour coding is green for sugars and additional wording to highlight the presence of sugars from fruit and / or milk is not required.
- None of the nutrients in a portion of this product are present in amounts that exceed the 'high' per portion criteria, therefore the classification derived using the per 100g information applies.

	Banding
Fat	Green
Saturates	Green
Sugars	Green
Salt	Amber

Product 2 – Ready meal

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

- As this is a food product, Table 1 will be used to determine the signpost.
- The total sugars does not exceed 5g, therefore colour coding is green for sugars and additional wording to highlight the presence of sugars from fruit and / or milk is not required.
- The amount of fat in a portion of this product exceeds the 'high' per portion criteria so this will override the classification derived using the per 100g criteria for this nutrient. For all remaining nutrients, the classification derived using the per 100g information applies.

	Banding
Fat	Red*
Saturates	Green
Sugars	Green
Salt	Amber

**classification using per portion criteria.*

Product 3 – Sandwich

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

- As this is a food product, Table 1 will be used to determine the signpost.
- The total sugars does not exceed 5g, therefore colour coding is green for sugars and additional wording to highlight the presence of sugars from fruit and / or milk is not required.
- None of the nutrients in a portion of this product are present in amounts that exceed the 'high' per portion criteria, therefore the classification derived using the per 100g information applies.

	Banding
Fat	Amber
Saturates	Amber
Sugars	Green
Salt	Amber

Product 4 – Breakfast cereal (e.g. wheat biscuits)

	Per 100g	**Per portion (45g, dry weight)**
Fat	2.5g	1.1g
Saturates	0.5g	0.2g
Sugars	0.9g	0.4g
Added sugars	0.0g	0.0g
Salt	0.02g	0.01g

- As this is a food product, Table 1 will be used to determine the signpost.
- The total sugars does not exceed 5g, therefore colour coding is green for sugars and additional wording to highlight the presence of sugars from fruit and / or milk is not required.

	Banding
Fat	Green
Saturates	Green
Sugars	Green
Salt	Green

Product 5 – Breakfast cereal (e.g. high fruit muesli)

	Per 100g	**Per portion (50g, dry weight)**
Fat	3.0g	1.5g
Saturates	0.7g	0.4g
Sugars	29.4g	15g
Added sugars	0.0g	0.0g
Salt	0.04g	0.02g

- As this is a food product Table 1 will be used to determine the signpost.
- The total sugars is more than 5g, therefore colour coding cannot be green. Amber / red colour coding is determined according to the level of added sugars.
- The nutrient information declared in the signpost for a portion is given on the basis of total sugars, i.e. 15g. **Additional text is required to highlight the presence of sugars** from fruit and / milk **not included in the colour code.**

	Banding
Fat	Green
Saturates	Green
Sugars	Amber
Salt	Green

Product 6 – Breakfast cereal (e.g. flakes, nuts and fruit)

	Per 100g	**Per portion (40g, dry weight)**
Fat	4.6g	1.8g
Saturates	0.6g	0.2g
Sugars	25.9g	10.4g
Added sugars	14.5g	5.8g
Salt	0.64g	0.26g

- As this is a food product Table 1 will be used to determine the signpost.
- The total sugars is more than 5g, therefore colour coding cannot be green. Amber / red colour coding is determined according to the level of added sugars.
- The nutrient information declared in the signpost for a portion is given on the basis of total sugars, i.e. 10.4g. The colour coding is red so additional wording to highlight the presence of sugars from fruit and / or milk is not required.

	Banding
Fat	Amber
Saturates	Green
Sugars	Red
Salt	Green