

Comparison of European Product Composition Criteria Sets

October 2015

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Request

Request

- The Dutch ministry of health welfare and sports has asked Schuttelaar & Partners (S&P) to make an inventory of existing European product composition criteria sets, which aim to stimulate the healthy food choice, and identify the differences between these composition criteria sets. The desk research will include FOP labelling and maximum criteria sets for (improving) product composition either obligatory or by means of a covenant.
- The inventory and identification of the differences is meant as a preparation for discussion on EU level on product improvement, during the Dutch EU presidency.

Goal

Goal

- To identify the differences in existing European product composition schemes focusing on:
 - Maximum criteria for product composition (obligatory or by means of a covenant);
 - FOP labelling systems.

Context

Context

1. Lower the rate of nutrition related obesity and related non communicable diseases
2. Translate dietary recommendations into product composition recommendations
3. International coherence is needed, because trade, policies and research are cross border

General observations

Synergy EU countries (Oct. 2015) - food logos and maximum criteria

Food logos (from questionnaire)	No food logos (from questionnaire)	Food logo unknown (from questionnaire)	Maximum criteria (from questionnaire)
Croatia ('For healthy living')			
	Austria		
	Belgium		
	Bulgaria		Bulgaria
		Cyprus	
Czech Republic (Choices)**			
Denmark (Keyhole)			
	Estonia		
Finland (Heart symbol)			Finland
		France	
	Germany		
	Greece		Greece
Hungary (Stop salt)			Hungary
		Ireland	
Italy ('Gaining health')			
Latvia (Green/ Claret spoon)			Latvia
Lithuania (Keyhole)			Lithuania
	Luxembourg		
		Malta	
Netherlands (Vinkje)			Netherlands
Norway (Keyhole)			
Poland (Choices)**			
		Portugal	
	Romania		
	Slovakia		Slovakia
Slovenia ('Protects health' Heart Symbol)			
	Spain		
Sweden (Keyhole)			
United Kingdom (BCC GDA)			United Kingdom

*Blue highlighted cells are the selected FOP composition schemes for this desk research.

**Although not mentioned in the questionnaire, Poland and Czech Republic participate in Choices.

Maximum criteria (from questionnaire)

(in g/100g unless stated otherwise)

Country*	General	Bread	Breakfast cereal	Dairy drinks	Processed meat	Sand-wiches	School meals	Soups
<u>Greece</u>	Salt ¹	1.5g added salt ²						
<u>Hungary</u>	TFA: 2 g/100 g of total fat ⁵	Salt in white bread: 2.5g ²			Salt ¹		Salt ¹ Fat in milk: 1.5% for > 3yrs ⁵	
<u>Slovakia</u>		Salt ¹					Salt ¹	
<u>Netherlands</u>		Salt: 1.5g based on flour ³		Added sugar: 8g ³	Sodium: 0.9-1.3g SAFA: 9-12g ³ (specified per group)			Sodium: 0.35g (prepared) ³
<u>Bulgaria</u>		Salt: 1.2g in bread ²			Salt: 2g For boiled smoked sausage: 3.5g ²		Salt ¹	
<u>UK</u>	TFA: 0% artificial ¹	Salt: 1.13g ¹	Salt: <1 ⁴		Salt specified per product type. E.g. 1.75g for frankfurters, hotdogs and burgers ⁴	Salt: 0.88g (no high salt filling) 1.5g (high salt filling) ⁴	Salt ¹	Salt 0.63g ⁴

*The countries marked with an underscore have indicated in the questionnaire to have legislation on one or more nutrients / product categories.

**Blue highlighted cells are selected examples, presented in this summary.

1) EC Questionnaire: Does your country have reformulation initiatives, government and/or private activities, which use maximal levels for implementation?

2) EC report: Survey on Members States, Implementation of the EU Salt Reduction Framework.

3) www.akkkoordverbeteringproductsamenstelling.nl

4) <https://responsibilitydeal.dh.gov.uk/pledges>

5) Additional info provided by Hungarian government.

Maximum criteria (from questionnaire)

(g/100g unless stated otherwise)



Country	General	Bread	Breakfast cereal	Dairy drinks	Processed meat	Sandwiches	School meals	Soups
<u>Latvia</u>	TFA: -2% of total fats -10% for products <3% of total fat - 4% for products 3-20% of fat ¹	Salt: 1.25g (for national scheme products) ¹		Added sugars: 5g Total fat milk (products): 2.5% (schools) ¹	Salt: 1.8g ¹		Salt: 0.4g Total sugar: 20 g per meal ¹	
<u>Lithuania</u>		Salt Added sugar ¹	Salt Added sugar Total sugar ¹	Total fat SAFA Added sugar Total sugar ¹	Total fat SAFA Added sugar Total sugar ¹		Salt Total fat SAFA Total sugar Added sugar ¹	
<u>Finland</u>	Salt SAFA ¹	Salt SAFA ¹	Salt SAFA ¹		Salt SAFA ¹		Salt SAFA ¹	

*The countries marked with an underscore have indicated in the questionnaire to have legislation on one or more nutrients / product categories.

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5) Additional info provided by Hungarian government.

Comparison FOP nutrients and reference units

	Vinkje	Keyhole	Heart Symbol	British Colour Coded GDA system
Nutrients				
Unsaturated fat	-	-	+	-
Dietary fibre	+	+	+	-
Energy	+	-	-	+
Total fat	-	+	+	+
SFA	+	-	+	+
TFA	+	-	-	-
Cholesterol	-	-	+	-
Sodium	-	+	+	-
Salt	+	-	-	+
Total sugars	-	+	+	+
Added sugars	+	-	+	-
Reference unit				
(m)g/100g or 100 ml	+	+	+	+
(m)g/100kcal or 100kJ	-	+	-	-
Per serving*	+	+	-	+
Daily value	-	-	-	-

*Not across-the-board. **Blue highlighted cells are the selected nutrients for this desk research.

Other logos than the selected FOP product composition schemes

- Stop salt, Hungary 2010* 
 - Developed by the National Institute for Food and Nutrition Science. Not used by industry, available in Hungarian only.
 - *According to correspondence between the Dutch ministry of health welfare and sports and Hungary, logos based on nutrition criteria presently do not exist in Hungary.
- Whole Grain Logo, Denmark 2009 
- The Green / Claret spoon, Latvia 2008  
 - Criteria for food quality, including local production / ingredients, no colorants, no GMO (www.karotite.lv)
 - Green spoon: 260 products, maximal levels mentioned
- 'Živjeti zdravo' ('For healthy living'), Croatia 2014 
 - Criteria available only in Croatian
- 'Guadagnare salute' ('Gaining health'), Italy 2009 
 - Only applicable for some reformulated lower salt products
- 'Varuje zdravjelt' ('Protects health'), Heart Symbol, Slovenia 1993 
 - www.zasrece.si

*Blue highlighted are FOP composition schemes also included in this desk research.

Synergy EU countries (Oct. 2015)

Maximum criteria and food logos

	Bread	Milk and fermented milk	Processed meat	Soups	Breakfast cereals	Sandwiches/ rolls
Sodium	11 FOP logos 9 Maximum criteria	4 FOP logos 0 Maximum criteria	10 FOP logos 6 Maximum criteria	10 FOP logos 2 Maximum criteria	10 FOP logos 2 Maximum criteria	10 FOP logos 1 Maximum criterion
SAFA	5 FOP logos 0 Maximum criteria	5 FOP logos 1 Maximum criterion	4 FOP logos 3 Maximum criteria	5 FOP logos 0 Maximum criteria	5 FOP logos 0 Maximum criteria	5 FOP logos 0 Maximum criteria
Total sugar	6 FOP logos 0 Maximum criteria	1 FOP logo 0 Maximum criteria	5 FOP logos 1 Maximum criterion	1 FOP logo 0 Maximum criteria	6 FOP logos 1 Maximum criterion	1 FOP logo 0 Maximum criteria
Total Fat	6 FOP logos 0 Maximum criteria	7 FOP logos 0 Maximum criteria	7 FOP logos 1 Maximum criterion	2 FOP logos 0 Maximum criteria	6 FOP logos 0 Maximum criteria	2 FOP logos 0 Maximum criteria

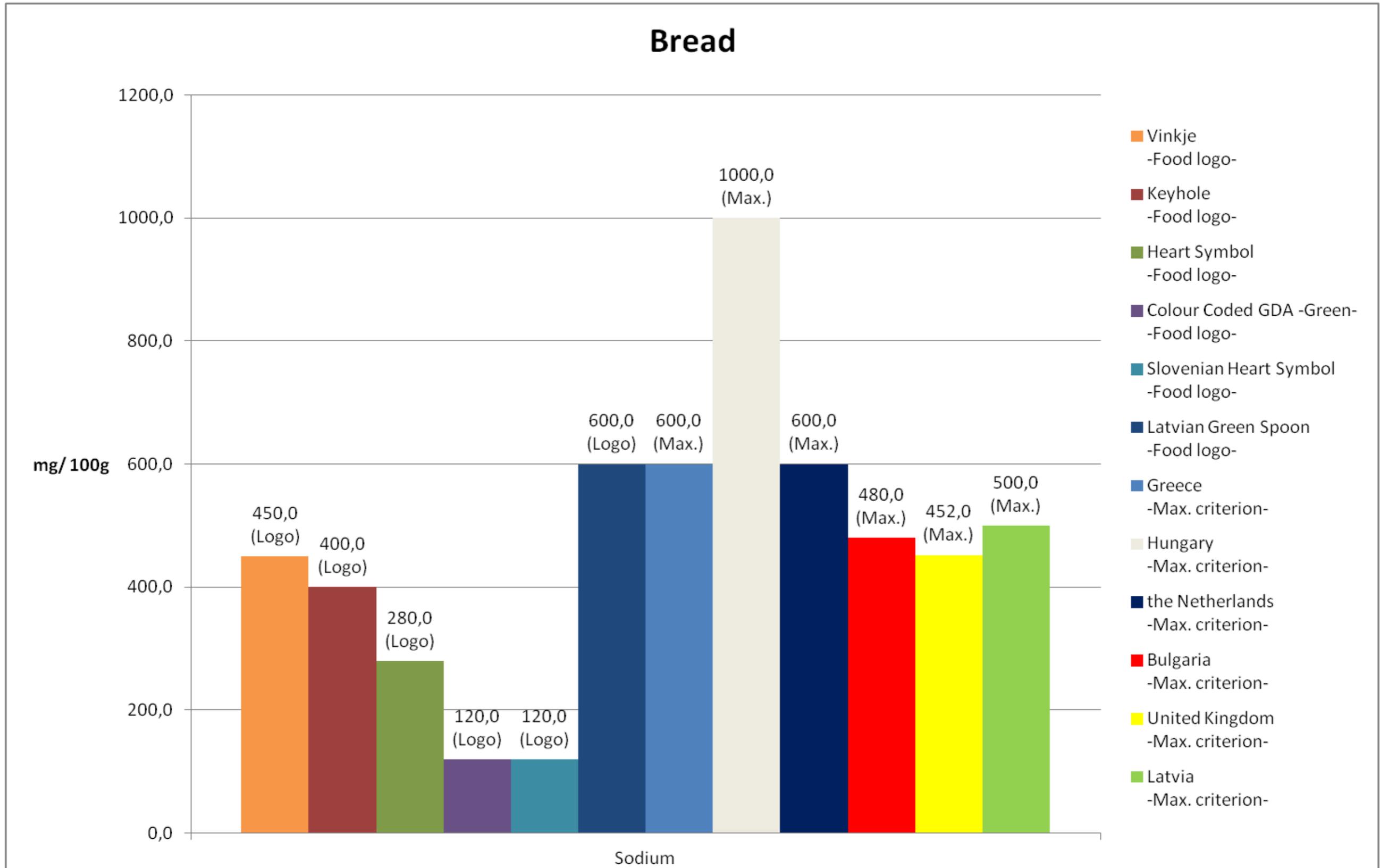
*The table shows the no. of countries having a FOP logo and/or maximum criteria for the nutrients and sub groups mentioned.

**The darker the colour of the cell, the more countries have a FOP logo and/or maximum criteria for this nutrient and sub group.

Sources: EC Questionnaire: Does your country have reformulation initiatives, government and/or private activities, which use maximal levels for implementation?; EC report: Survey on Members States, Implementation of the EU Salt Reduction Framework; www.akkoordverbeteringproductsamenstelling.nl and <https://responsibilitydeal.dh.gov.uk/pledges>.

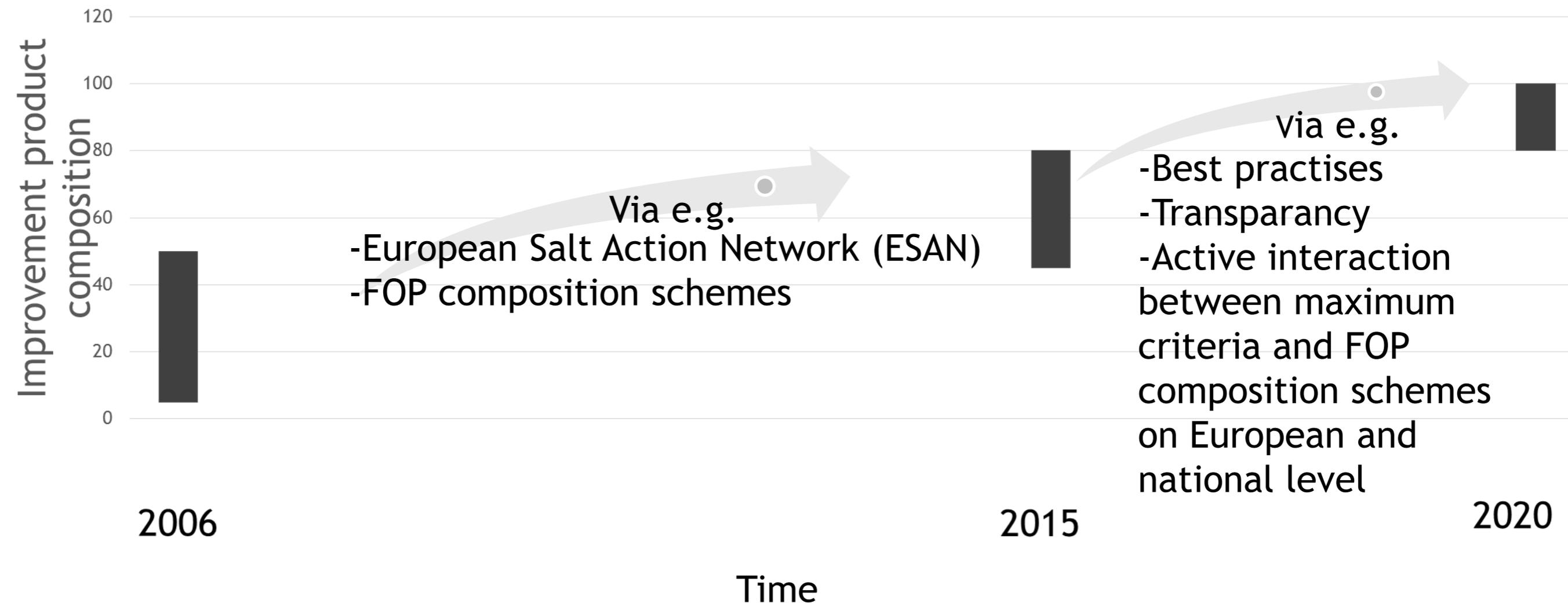
FOP composition schemes and maximum criteria

Example: bread & sodium



Schematic development maximum criteria and FOP composition schemes EU countries 2006-2020

European product composition variations across countries at given time



Observations on classification (1/2)

Subgroups

- Overall, Vinkje, Keyhole and Heart Symbol are comparable with regard to their subgroups. However, these differ slightly in terms of definitions.
- The British Colour Coded GDA system doesn't give a specific definition about its 'foods' and 'drinks' food groups.
 - The classification needs clarification.

Nutrients

- The nutrients used by the four major FOP composition schemes (Vinkje, Keyhole, Heart Symbol and the BCC GDA system) are not the same, which complicates a 'fair' comparison.
 - For instance, Vinkje doesn't use total fat and total sugar as qualifying criterion, but does have criteria for SAFA and added sugar. As a result, the choice of subgroup as well as the definition of nutrients has an effect on the observation. (see breakfast cereals in ANNEX 4)

Observations on classification (2/2)

Cut-off points

- The cut-off points also slightly differ, mainly due to adjustment to national eating culture and market.
- The cut-off points of the Slovenian Heart Symbol are similar to the cut-off points of the green light of the BCC GDA system.

General

- Synergy of maximum levels and FOP composition schemes can be achieved by harmonization on definitions and standardization of FOP composition schemes and reformulation initiatives:
 - EU wide FOP logos
 - EU reformulation initiatives on nutrients
- Currently, revision of the FOP composition schemes is not equally nutrition-scientifically based, because the choice of nutrients (e.g. total fat versus added fat) differs.

General conclusions

- Current national maximum criteria on nutrients, such as sodium in bread or processed meat, offer the opportunity for EU-wide coordination.
- The five major FOP composition schemes (including Slovenia) have been developed independently over several years, and offer an opportunity for EU wide introduction.
- The next revision of the maximum criteria and FOP composition schemes should be nutrition-scientifically based and performed by competent (EU) authorities.
- Reducing the variations between existing European maximum criteria and FOP composition schemes could be accomplished by going on a journey together, while making use of means such as best practises (UK Public Health Responsibility Deal), transparency and active exchange between maximum criteria and FOP composition schemes.
- An ideal result would be to have initiatives on national level (adapted to national eating culture and market) as well as on European level. Besides, this would also enable the EU countries to involve food companies and harmonize their maximum levels with the maximum levels which some food companies now apply for their own products.
- It is suggested to focus on European wide collaboration on product criteria, for example on sodium in processed meat. This reduction would create a significant impact on health (blood pressure).

ANNEX 1:
EC Questionnaire:
Inventory of the maximum
criteria of European
reformulation initiatives for
product composition

Maximum levels of European reformulation initiatives - Method



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- The questionnaire was leading, therefore only the countries in the questionnaire are reported on. Additional sources were used for adding more information.
 - We selected the same sub groups and nutrients as used for the major four FOP composition schemes to demonstrate the differences/ similarities
 - Sub groups:
 - Drinks on the basis of dairy, breakfast cereals, soups, processed meat and sandwiches/rolls, bread
 - Additionally: school meals
 - Nutrients (cut-off points, if applicable)
 - Total fat, SAFA, total sugar, sodium
 - TFA and added sugar (added by S&P)
 - The highlights are presented in this presentation, including:
 - Identification of similarities and differences in the maximum criteria used

Maximum criteria (from questionnaire)

(in g/100g unless stated otherwise)

Country*	General	Bread	Breakfast cereal	Dairy drinks	Processed meat	Sand-wiches	School meals	Soups
<u>Greece</u>	Salt ¹	1.5g added salt ²						
<u>Hungary</u>	TFA: 2 g/100 g of total fat ⁵	Salt in white bread: 2.5g ²			Salt ¹		Salt ¹ Fat in milk: 1.5% for > 3yrs ⁵	
<u>Slovakia</u>		Salt ¹					Salt ¹	
<u>Netherlands</u>		Salt: 1.5g based on flour ³		Added sugar: 8g ³	Sodium: 0.9-1.3g SAFA: 9-12g ³ (specified per group)			Sodium: 0.35g (prepared) ³
<u>Bulgaria</u>		Salt: 1.2g in bread ²			Salt: 2g For boiled smoked sausage: 3.5g ²		Salt ¹	
<u>UK</u>	TFA: 0% artificial ¹	Salt: 1.13g ¹	Salt: <1 ⁴		Salt specified per product type. E.g. 1.75g for frankfurters, hotdogs and burgers ⁴	Salt: 0.88g (no high salt filling) 1.5g (high salt filling) ⁴	Salt ¹	Salt 0.63g ⁴

*The countries marked with an underscore have indicated in the questionnaire to have legislation on one or more nutrients / product categories.

**Blue highlighted cells are selected examples, presented in this summary.

1) EC Questionnaire: Does your country have reformulation initiatives, government and/or private activities, which use maximal levels for implementation?

2) EC report: Survey on Members States, Implementation of the EU Salt Reduction Framework.

3) www.akkkoordverbeteringproductsamenstelling.nl

4) <https://responsibilitydeal.dh.gov.uk/pledges>

5) Additional info provided by Hungarian government.

Maximum criteria (from questionnaire)

(g/100g unless stated otherwise)



Country	General	Bread	Breakfast cereal	Dairy drinks	Processed meat	Sand-wiches	School meals	Soups
<u>Latvia</u>	TFA: -2% of total fats -10% for products <3% of total fat - 4% for products 3-20% of fat ¹	Salt: 1.25g (for national scheme products) ¹		Added sugars: 5g Total fat milk (products): 2.5% (schools) ¹	Salt: 1.8g ¹		Salt: 0.4g Total sugar: 20 g per meal ¹	
<u>Lithuania</u>		Salt Added sugar ¹	Salt Added sugar Total sugar ¹	Total fat SAFA Added sugar Total sugar ¹	Total fat SAFA Added sugar Total sugar ¹		Salt Total fat SAFA Total sugar Added sugar ¹	
<u>Finland</u>	Salt SAFA ¹	Salt SAFA ¹	Salt SAFA ¹		Salt SAFA ¹		Salt SAFA ¹	

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Maximum levels of European reformulation initiatives - Observations



- For some countries it is not clear whether these are levels for logo or separate reformulation programmes (e.g. Lithuania, Finland)
- The questionnaire does not provide a complete overview. There seem to be many more European countries with reformulation initiatives, who did not participate in the questionnaire. See e.g. EC salt report and notification documents.
- Portugal has legal measures on salt and sugar (proposed) in bread (notification 2014).
- Slovakia has notified a salt reduction, but questions have been asked regarding free trade by the Czech Republic.

ANNEX 2:
EC Questionnaire:
Other FOP product composition
schemes in Europe

EU countries with/without logos

Logo*	No logo*	Unknown*
Hungary (Stop salt)	Romania	Malta
Netherlands (Vinkje)	Greece	Cyprus
Denmark (Keyhole)	Luxembourg	France
United Kingdom (BCC GDA)	Bulgaria	Ireland
Latvia (Green/ Claret spoon)	Spain	Portugal
Croatia ('For healthy living')	Estonia	
Norway (Keyhole)	Germany	
Italy ('Gaining health')	Belgium	
Sweden (Keyhole)	Austria	
Lithuania (Keyhole)	Slovakia	
Finland (Heart symbol)		
Slovenia ('Protects health' Heart Symbol)		
Poland (Choices)**		
Czech Republic (Choices)**		

*From EC Questionnaire: Are food logos based on composition criteria (nutrient profiles) used in your country?

**Although not mentioned in the questionnaire, Poland and Czech Republic participate in Choices.

Other logos than the selected FOP product composition schemes

- Stop salt, Hungary 2010. 
 - Developed by the National Institute for Food and Nutrition Science. Not used by industry, available in Hungarian only
- Whole Grain Logo, Denmark 2009 
- The Green / Claret spoon, Latvia 2008  
 - Criteria for food quality, including local production / ingredients, no colorants, no GMO (www.karotite.lv)
 - Green spoon: 260 products, maximal levels mentioned
- ‘Zivjeti zdravo’ (‘For healthy living’), Croatia 2014
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- ‘Guadagnare salute’ (‘Gaining health’), Italy 2009 
 - Only applicable for some reformulated lower salt products
- ‘Varuje zdravjelt’ (‘Protects health’), Heart Symbol, Slovenia 1993
 - www.zasrece.si 

ANNEX 2:

Comparison of the major FOP
product composition schemes
in Europe

Process description - Sources

- Het Vinkje (Choices)
 - Stichting Ik Kies Bewust, *Productcriteria Stichting Ik Kies Bewust*, version 2015
- Keyhole criteria
 - The National Food Agency's Code of Statutes, *Regulations amending the National Food Agency's regulations (SLVFS 2005:9) on the use of a particular symbol*, January 2015
- Finnish Heart Logo criteria
 - <http://www.sydanmerkki.fi/en/sydanmerkki/criteria>, 13 August 2015
- British Colour Coded GDA system
 - Department of Health, the Food Standards Agency (Scotland, Northern Ireland and Wales) in collaboration with the British Retail Consortium, *Guide to creating a front of pack (FoP) nutrition label for pre-packed products sold through retail outlets*, June 2013

Process description - Method

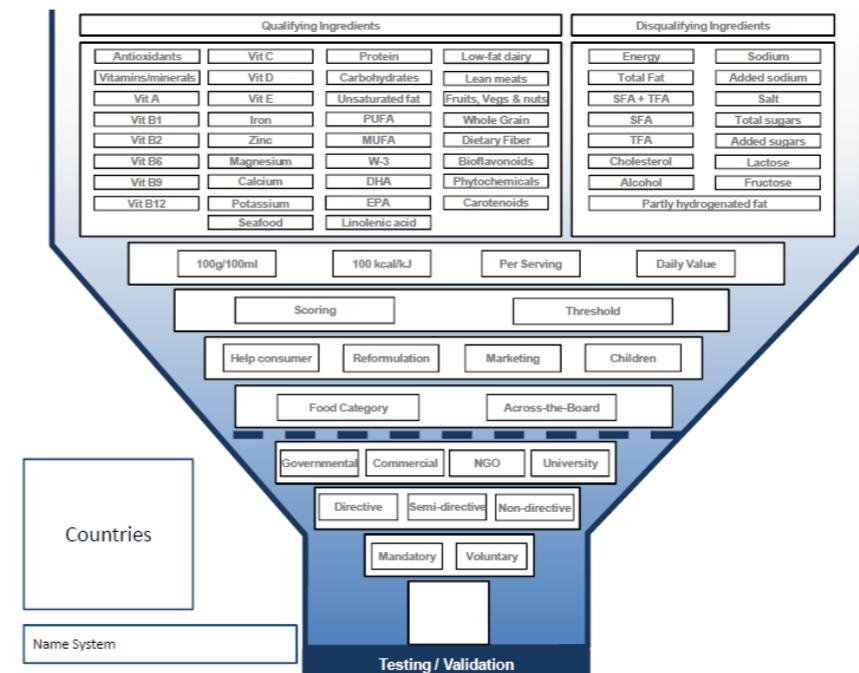
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- All the nutrient cut-off points of Vinkje, Keyhole, Heart Symbol and the British Colour Coded GDA system were documented in an Excel file
 - The sub groups were matched with each other, using the Vinkje sub groups as basis for categorisation
 - Next, six sub groups were selected to demonstrate the differences/ similarities between the different FOP composition schemes with respect to four selected nutrient cut-off points
 - Sub groups: Bread, milk and fermented milk, breakfast cereals, soups, processed meat and sandwiches/rolls
 - Nutrients (g/100g): total fat, SAFA, total sugar and sodium
 - Corresponding highlights are presented in this presentation, including:
 - Identification of similarities and differences in the composition schemes
 - Summary with technical observations based on the research

FOP product composition schemes

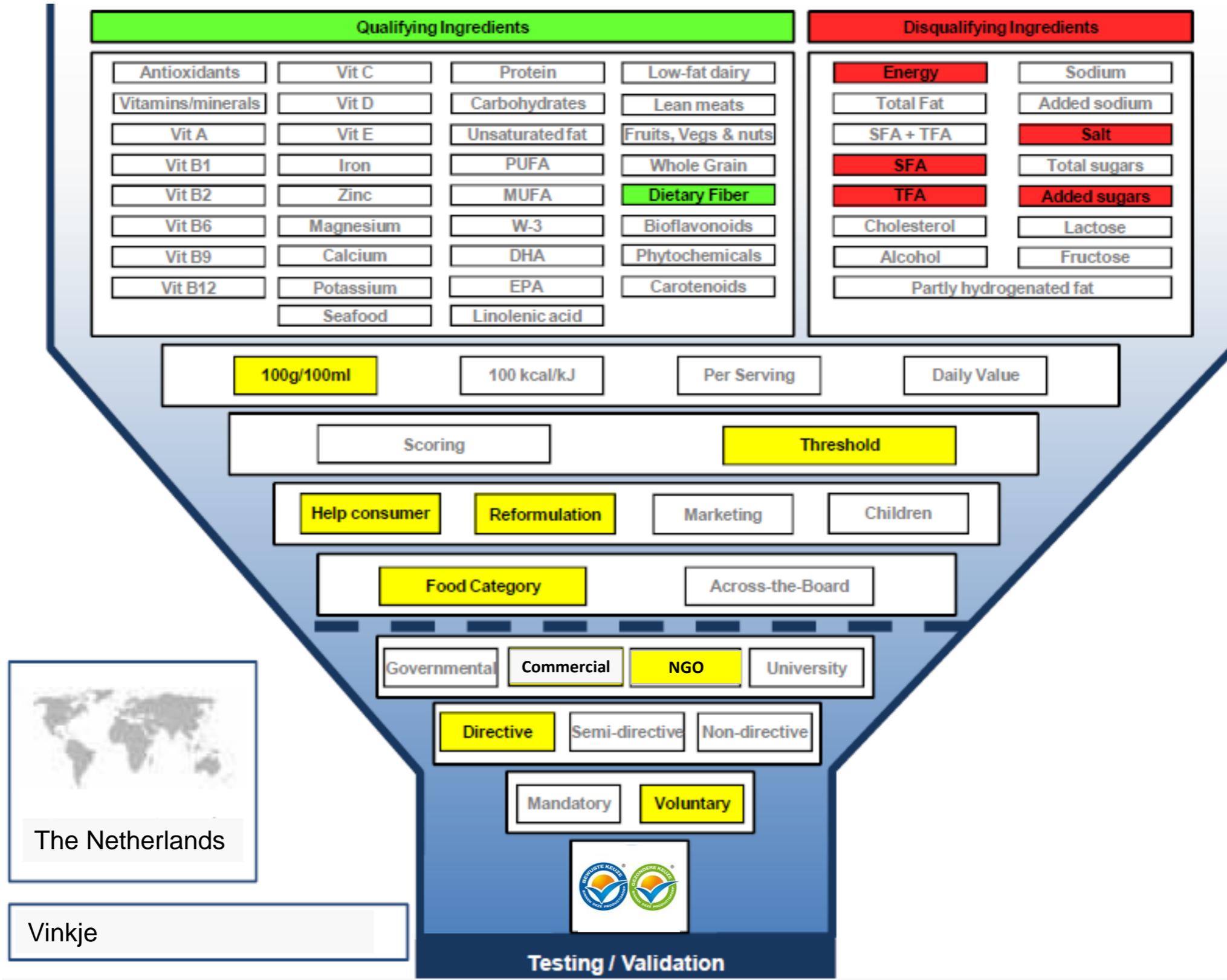
The Funnel model

- As a starting point we used the funnel model to indentify and visualise the criteria of the FOP labelling systems¹. The following characteristics are described:

- Country
- Organisation name and organisation type
- Utilisation
- Methodological approach
- Measurement method
- Risk and benefit criteria
- Reference unit
- Directivity
- Purpose
- Symbol

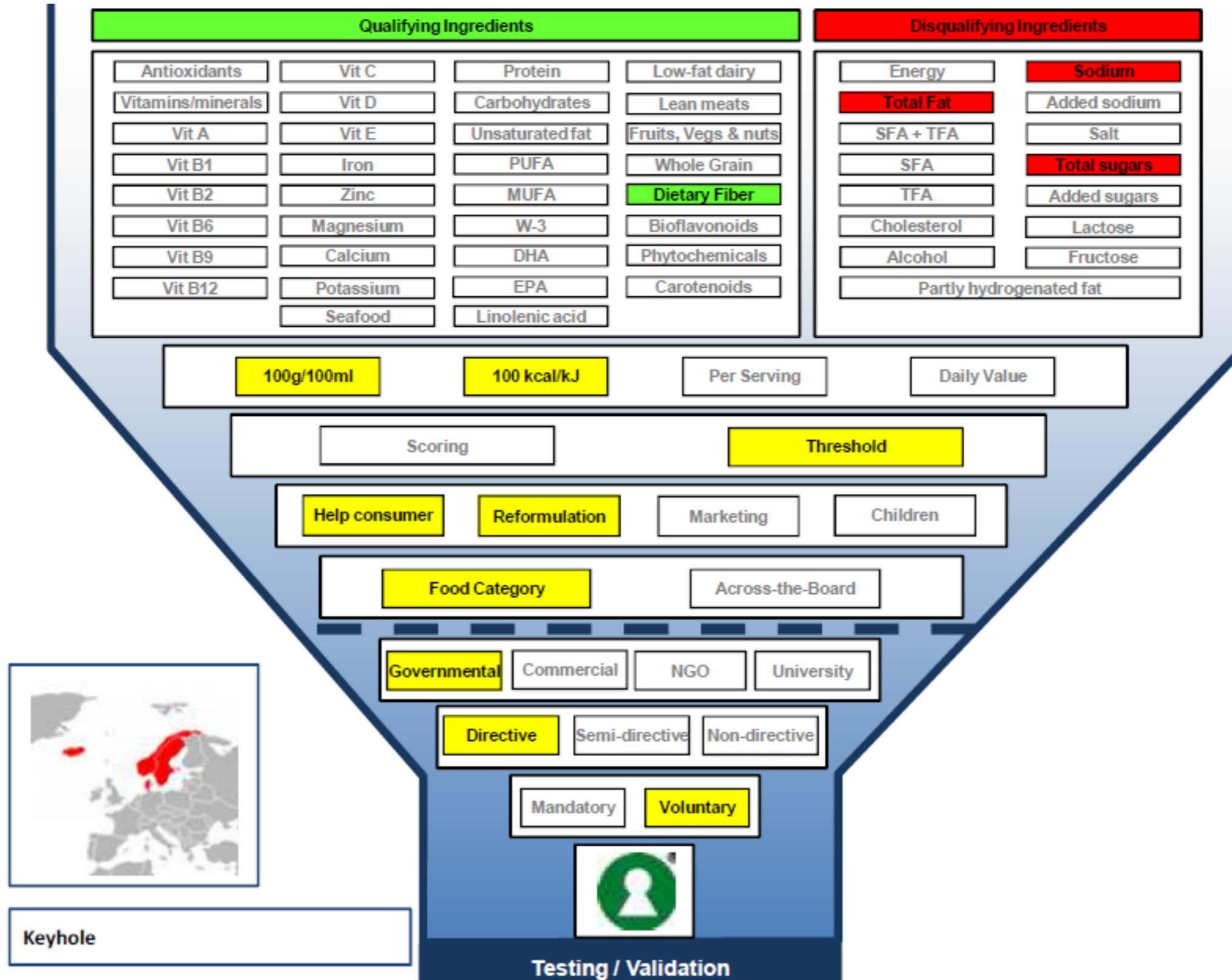


¹ Van der Bend et al, A Simple Visual Model to Compare Existing Front-of-pack Nutrient Profiling Schemes; European Journal of Nutrition and Food Safety 4(4): 429-534, 2014



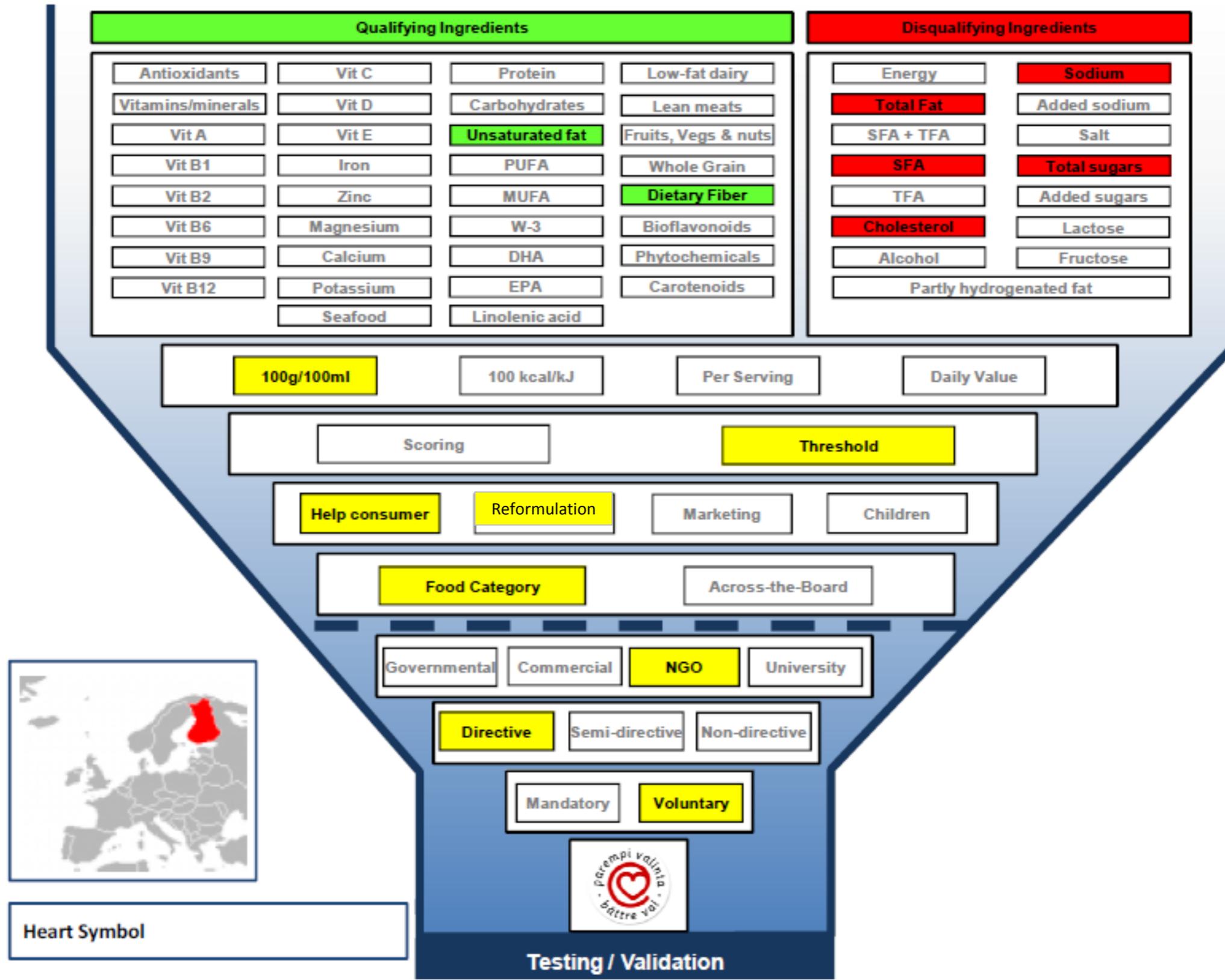
Vinkje

Keyhole

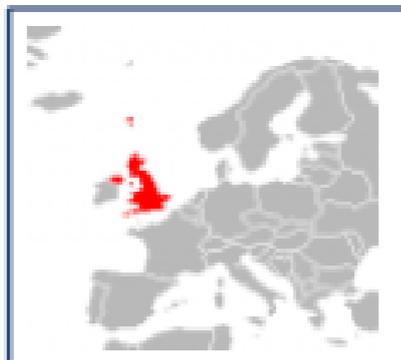
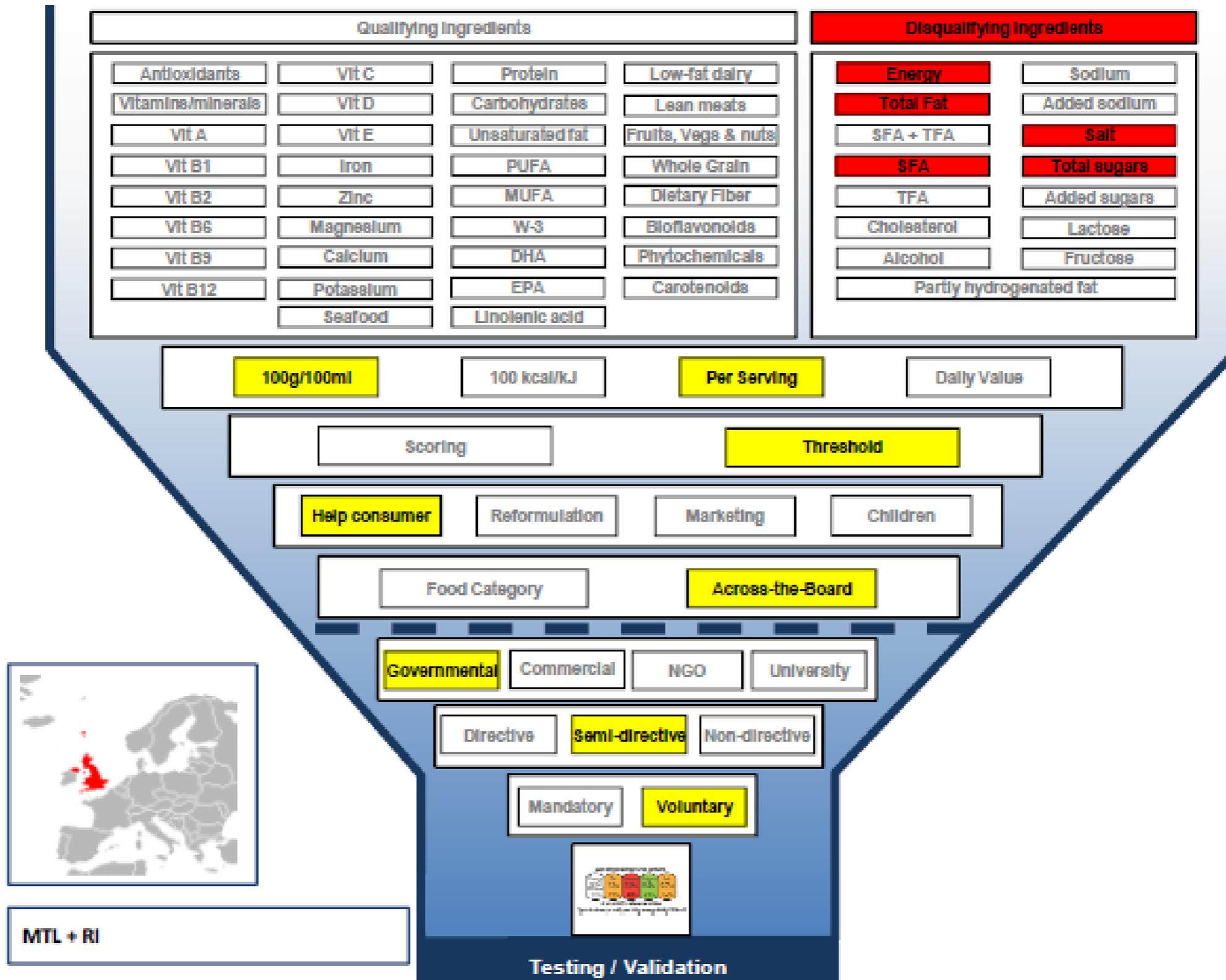


Keyhole

Heart symbol



British Colour Coded GDA System



MTL + RI

Comparison FOP nutrients and reference units

	Vinkje	Keyhole	Heart Symbol	British Colour Coded GDA system
Nutrients				
Unsaturated fat	-	-	+	-
Dietary fibre	+	+	+	-
Energy	+	-	-	+
Total fat	-	+	+	+
SFA	+	-	+	+
TFA	+	-	-	-
Cholesterol	-	-	+	-
Sodium	-	+	+	-
Salt	+	-	-	+
Total sugars	-	+	+	+
Added sugars	+	-	+	-
Reference unit				
(m)g/100g or 100 ml	+	+	+	+
(m)g/100kcal or 100kJ	-	+	-	-
Per serving*	+	+	-	+
Daily value	-	-	-	-

*Not across-the-board

Comparison nutrients and reference units - observations



- Overall, the FOP composition schemes use many different nutrients (criteria). This specifically complicates a comparison for fat (some schemes have criteria for total fat, while others only mention added fat) and sugar (some schemes have criteria for total sugar, while others only mention added sugar).
- The only nutrient that is included in all four FOP composition schemes is sodium/salt.
- Three similar nutrients are seen for:
 - Dietary fibre: Vinkje, Keyhole and Heart Symbol
 - Total fat: used by Keyhole, Heart Symbol and BCC GDA system
 - SAFA: Vinkje, Heart Symbol and BCC GDA system
 - Total sugars: Keyhole, Heart Symbol and BCC GDA system
- With the exception of the reference unit (g/100g), the four major schemes show no similarities.
- Taken into account the DGAC report (Feb 2015) on the US Dietary Guidelines 2015: total fat and cholesterol could be dismissed as criteria in the future.

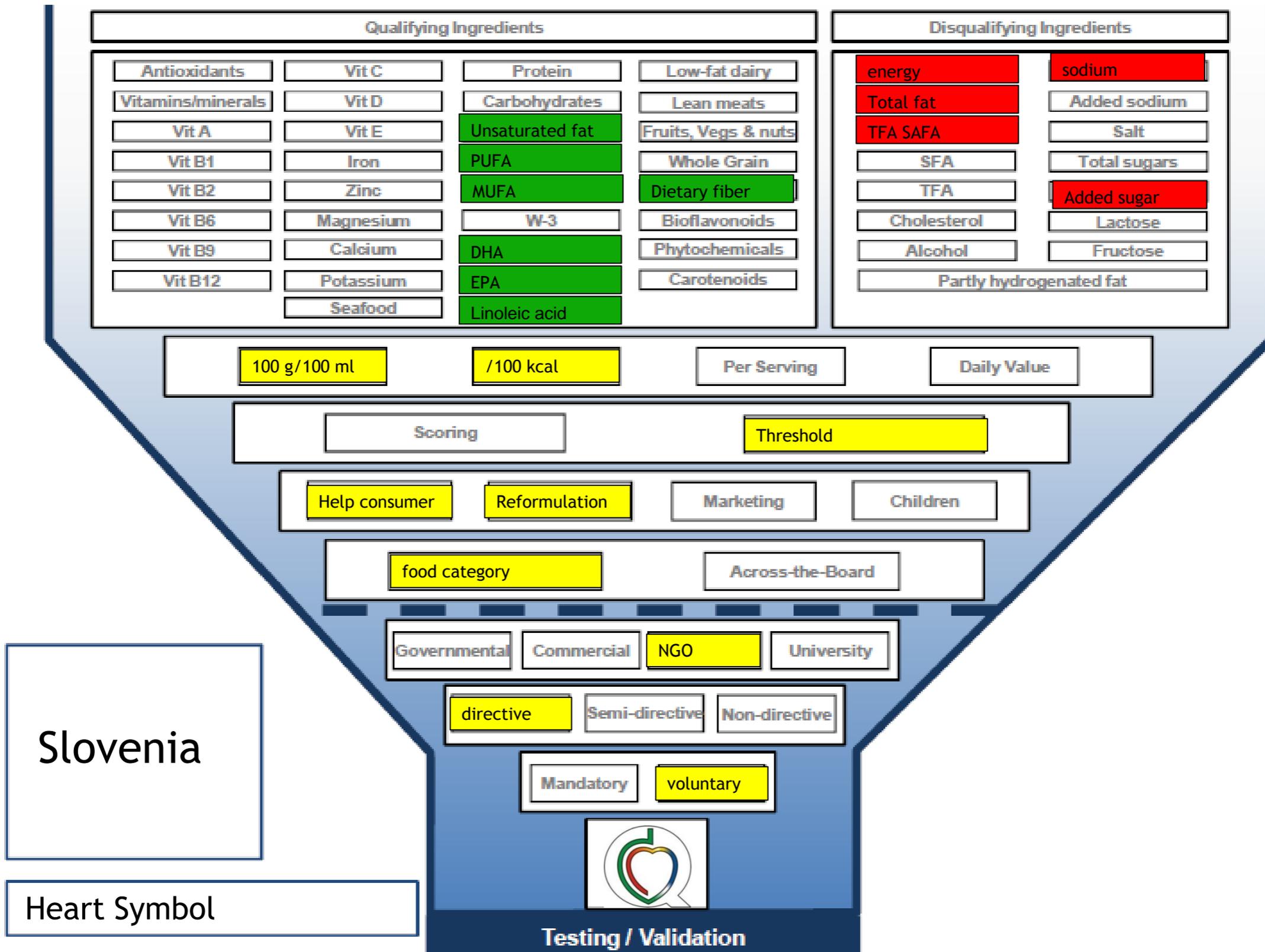
Comparison product groups - observations

Amount of food groups and subdivision into sub groups

	Vinkje	Keyhole	Heart Symbol	British Colour Coded GDA system
Food groups	13	9	9	2
Sub groups	31	33	53	0

- The major difference between Vinkje and Keyhole is that the latter is focused on basic food products that contain essential nutrients. Vinkje enables the labelling of all product groups, and classifies them in basic food products and non-basic food products such as snacks and soft drinks.
- The Heart Symbol can be placed between Vinkje and Keyhole concerning the labelling of basic- and non-basic food products. For example, it does not label beverages, candy and snacks, but does label sweet and savoury pastries and ice-cream (excluded from labelling in Keyhole).
- The British Colour Coded GDA system distinguishes two product groups, namely foods and drinks. Within these two groups the green, amber and red colours distinguish to which extent the nutrient is responsible.

Slovenian Heart Symbol



Slovenia

Heart Symbol

Cut-off points

Cut-off points - Method

- Six sub groups were selected to demonstrate the differences/ similarities between the FOP composition schemes with respect to total fat, SAFA, total sugar and sodium
- Sub groups:
 - Bread, drinks on the basis of dairy, breakfast cereals, soups, processed meat and sandwiches/rolls
 - Note: Based on the selected sub groups, the corresponding sub groups were chosen only if all FOP composition schemes had a ‘similar’ sub group.
 - Note: the Vinkje sub groups are used as basis for categorisation
- The Slovenian Heart Symbol and the Latvian Green/ Claret spoon are included when possible.

Cut-off points - Remarks (1 / 3)

- The sub groups of the four FOP composition schemes are not fully comparable, due to the national eating culture and market of each country. This should be taken into account when interpreting the corresponding cut-off points.
- A comparison of Vinkje, Keyhole and Heart Symbol with the BCC GDA system should be made with caution, as the latter:
 - Has only cut-off points for ‘foods’ and ‘drinks’
 - Makes a distinction between low, medium and high cut-off values
 - Takes the serving size into account when a product is more than 100g or 150mL

Cut-off points - Remarks (2/3)

- To ensure a ‘fair’ comparison, the graphs only include cut-off points of positive FOP composition schemes. Therefore, only the green light of the Colour Coded GDA system was included.
- The only nutrient that is included in all four FOP composition schemes is sodium.
- Three similar nutrients are seen for:
 - Total fat: Keyhole, Heart Symbol and BCC GDA system (Vinkje is missing)
 - SAFA: Vinkje, Heart Symbol and BCC GDA system (Keyhole is missing)
 - Total sugars: Keyhole, Heart Symbol and BCC GDA system (Vinkje is missing)

Cut-off points - Remarks (3/3)

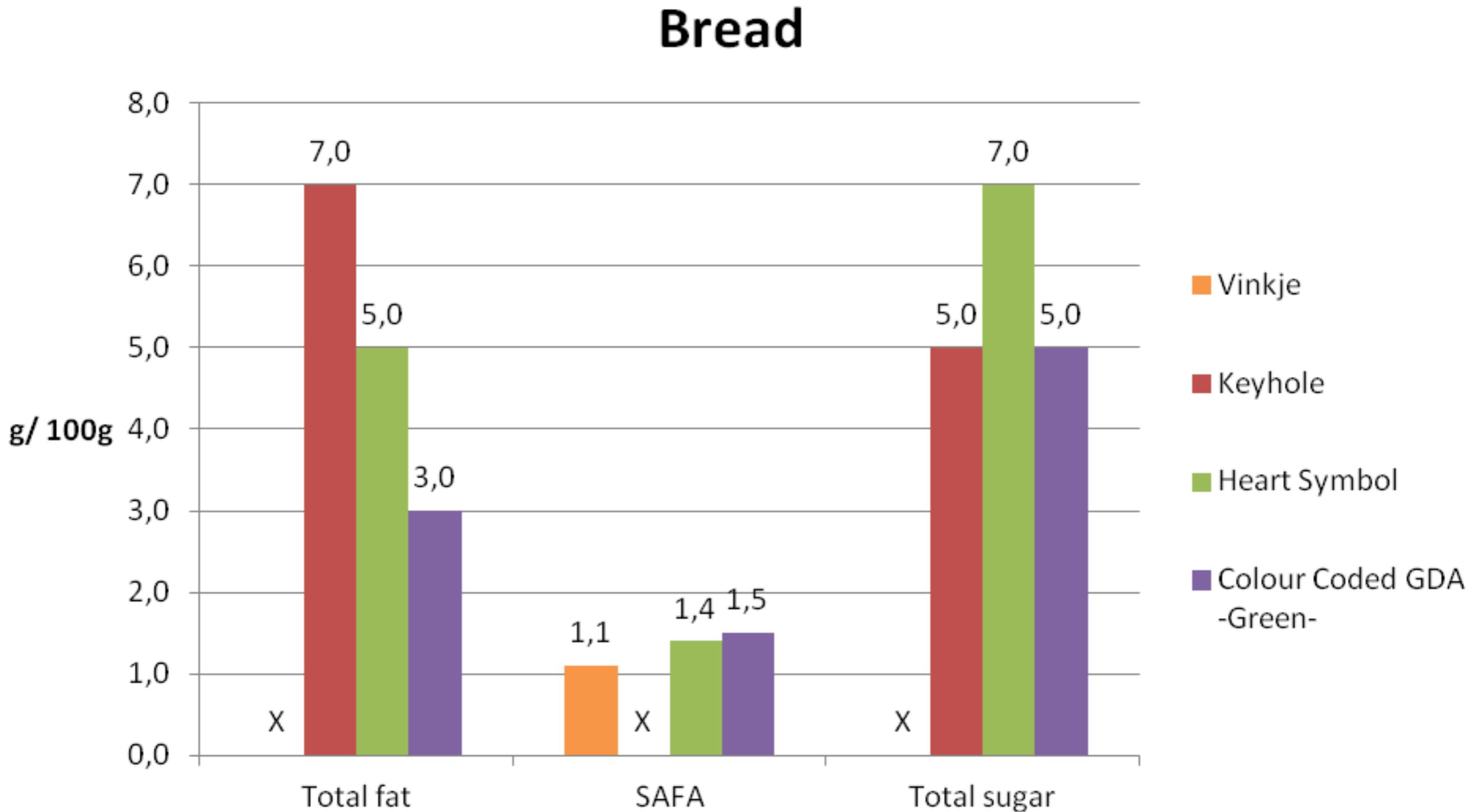
- We assume that ‘hard fat’ of the Heart Symbol is equal to SAFA. Its corresponding cut-off point is dependent on the maximum fat content of a product, if this fat content is higher than the maximum amount of total fat allowed.
- For the comparison between ‘milk and fermented milk’ cut-off points, we used the ‘drinks’ food group of the Colour Coded GDA system which is in g/ 100mL (instead of g/ 100g).
- In the graphs the 'X' stand for ‘no cut-off point available’.
- All cut-off points are expressed in terms of ‘equal or smaller than’.
 - For example, total fat: $\leq 10\text{g} / 100\text{g}$

Bread

Vinkje	Keyhole	Heart Symbol	Colour Coded GDA	Slovenian Heart Symbol	Latvian Green Spoon
Bread All sorts of bread and bread substitutes other than breakfast cereals	8a) Soft bread and bread mixes where only liquid and yeast are to be added and bread containing a minimum of 30 % whole grain calculated on the basis of the product's dry matter content. Products in food group 8b) are not covered. Gluten free bread and bread mixes shall contain at least 10 % whole grain calculated on the basis of the product's dry matter content. The conditions refer to ready-to-consume products.	Bread	Foods	Detailed information to be retrieved	Detailed information to be retrieved

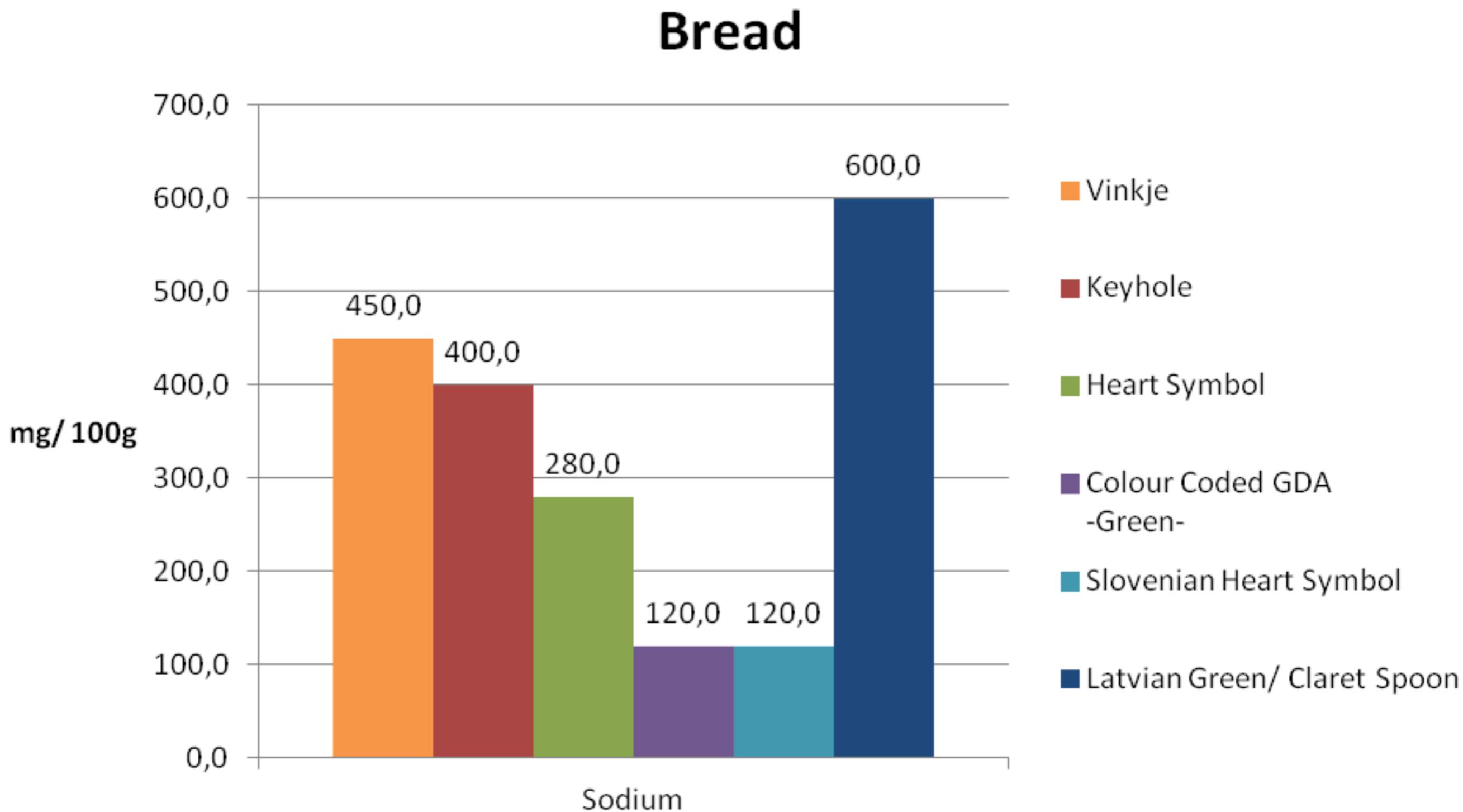
Bread - total fat, SAFA, total sugar

Comparison major FOP schemes



Bread - sodium

Comparison major FOP schemes, including Slovenia and Latvia



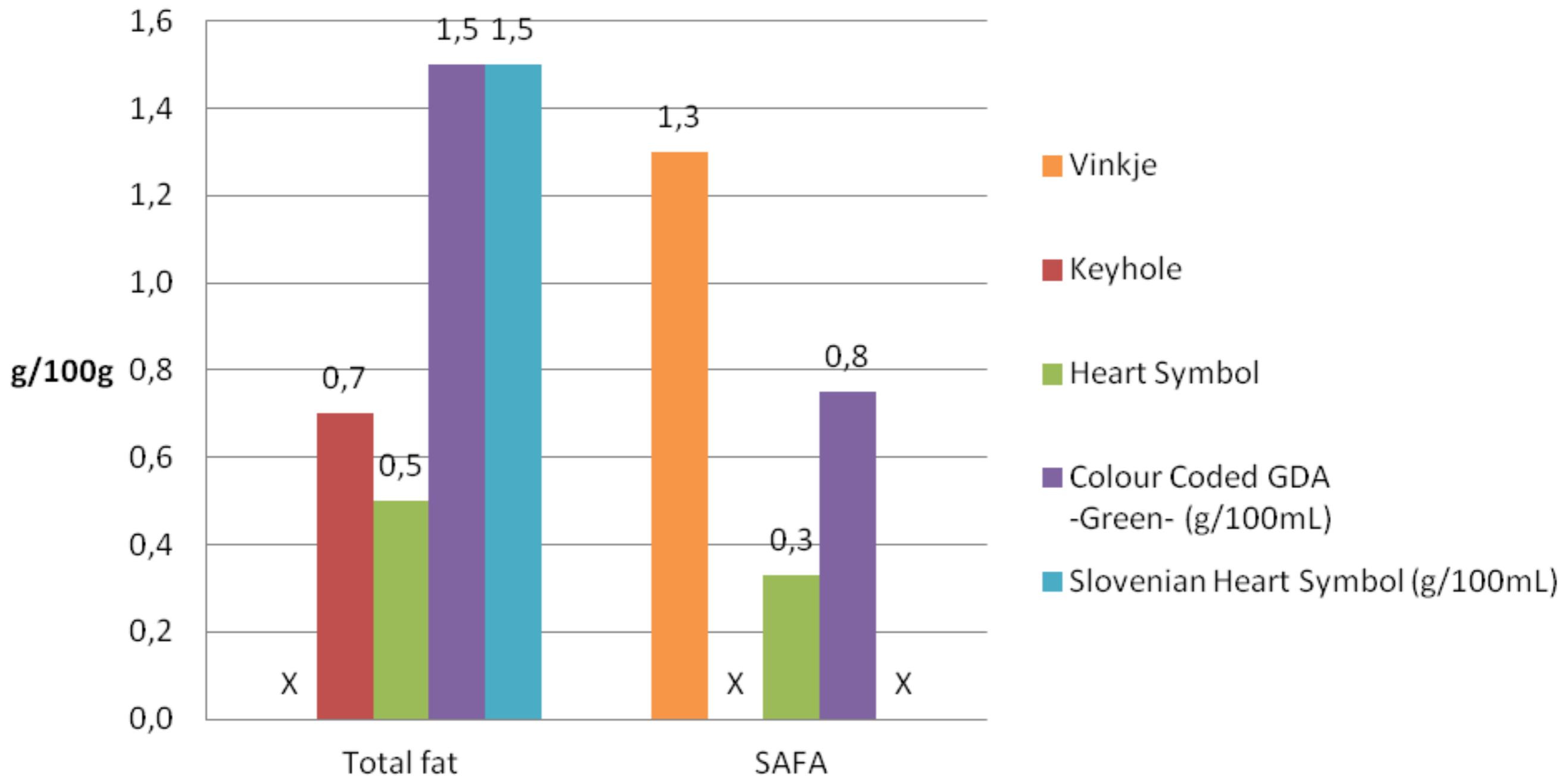
Milk and fermented milk

Vinkje	Keyhole	Heart Symbol	Colour Coded GDA	Slovenian Heart Symbol
Milk , milk products and milk substitutes	11a) Milk and similar fermented milk products	Milk, sour milk and other similar products	Drinks	Detailed information to be retrieved
All types of milk and milk products.	intended as a drink and that are not flavoured.			
Milk substitutes have to include two of these nutrients, containing at least the following quantities per 100 g: Calcium (100mg), Vitamin B2 (0,11mg), folate (40µg), Vitamin B12 (0,24µg). OR be produced from a minimum of 70% dairy.	Similar lactose free products and lactose free milk drinks are also covered.			

Milk and fermented milk - total fat, SAFA

Comparison major FOP schemes, including Slovenia

Milk and fermented milk

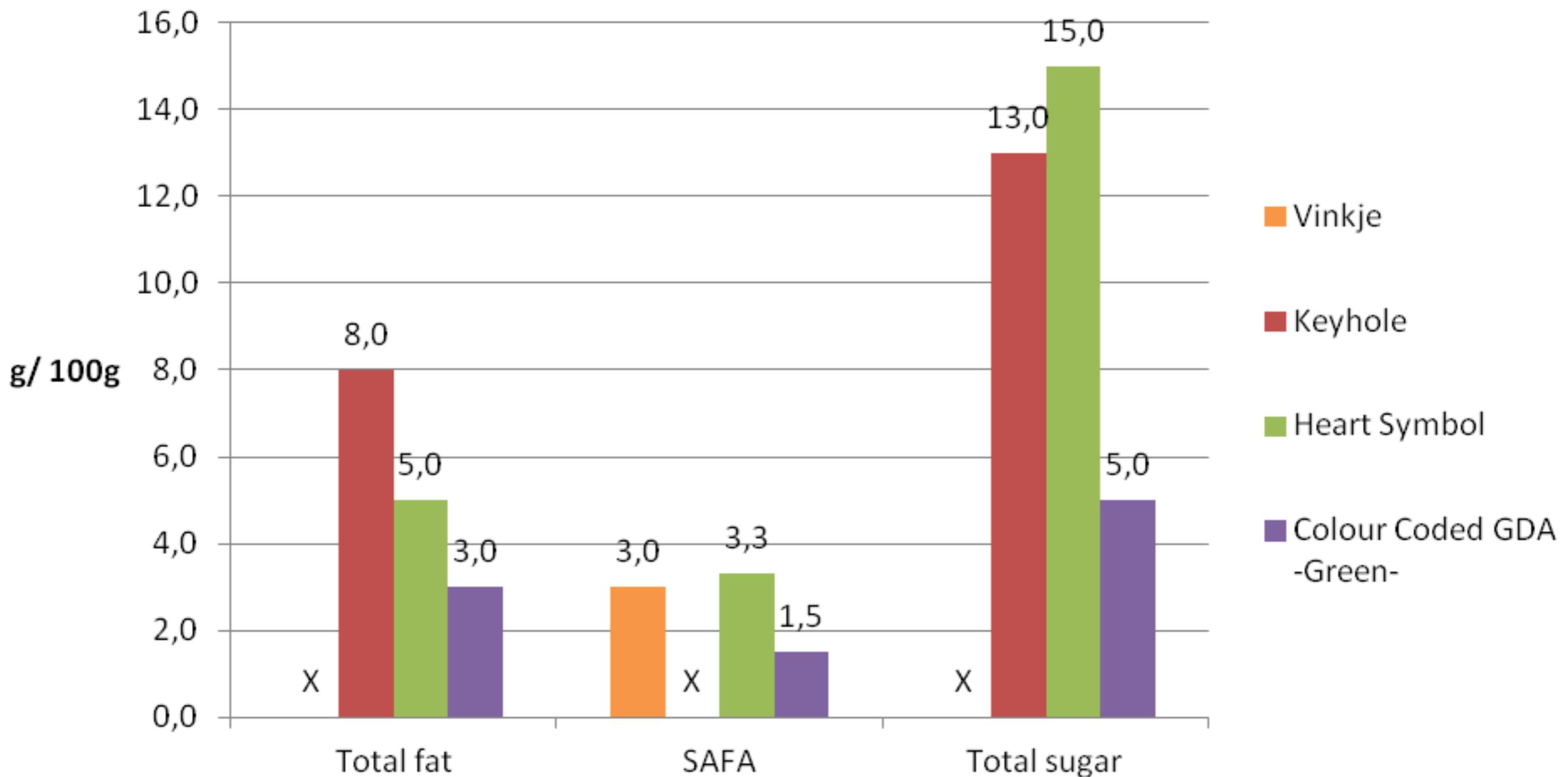


Breakfast cereals

Vinkje	Keyhole	Heart Symbol	Colour Coded GDA	Slovenian Heart Symbol
Breakfast cereal products	6) Breakfast flakes and muesli containing at least 55 % whole grain calculated on the basis of the product's dry matter content.	Seasoned grain products (breakfast cereals, muesli and alike)	Foods	Detailed information to be retrieved
All types of breakfast cereal products.	Gluten free breakfast flakes and muesli shall contain at least 20 % whole grain calculated on the basis of the product's dry matter content.			

Breakfast cereals - total fat, SAFA, total sugar

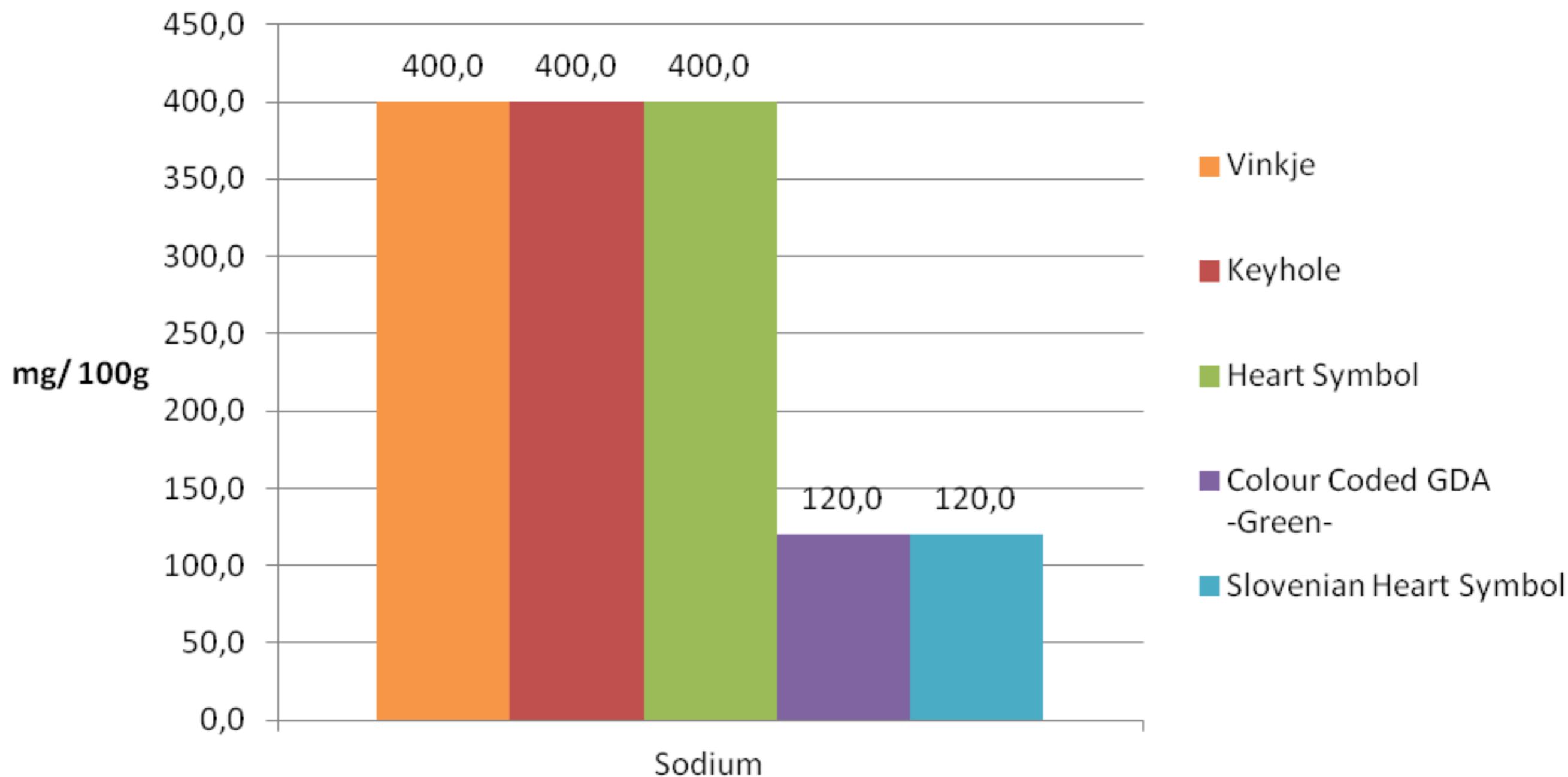
Breakfast cereals



Breakfast cereals - sodium

Comparison major FOP schemes, including Slovenia

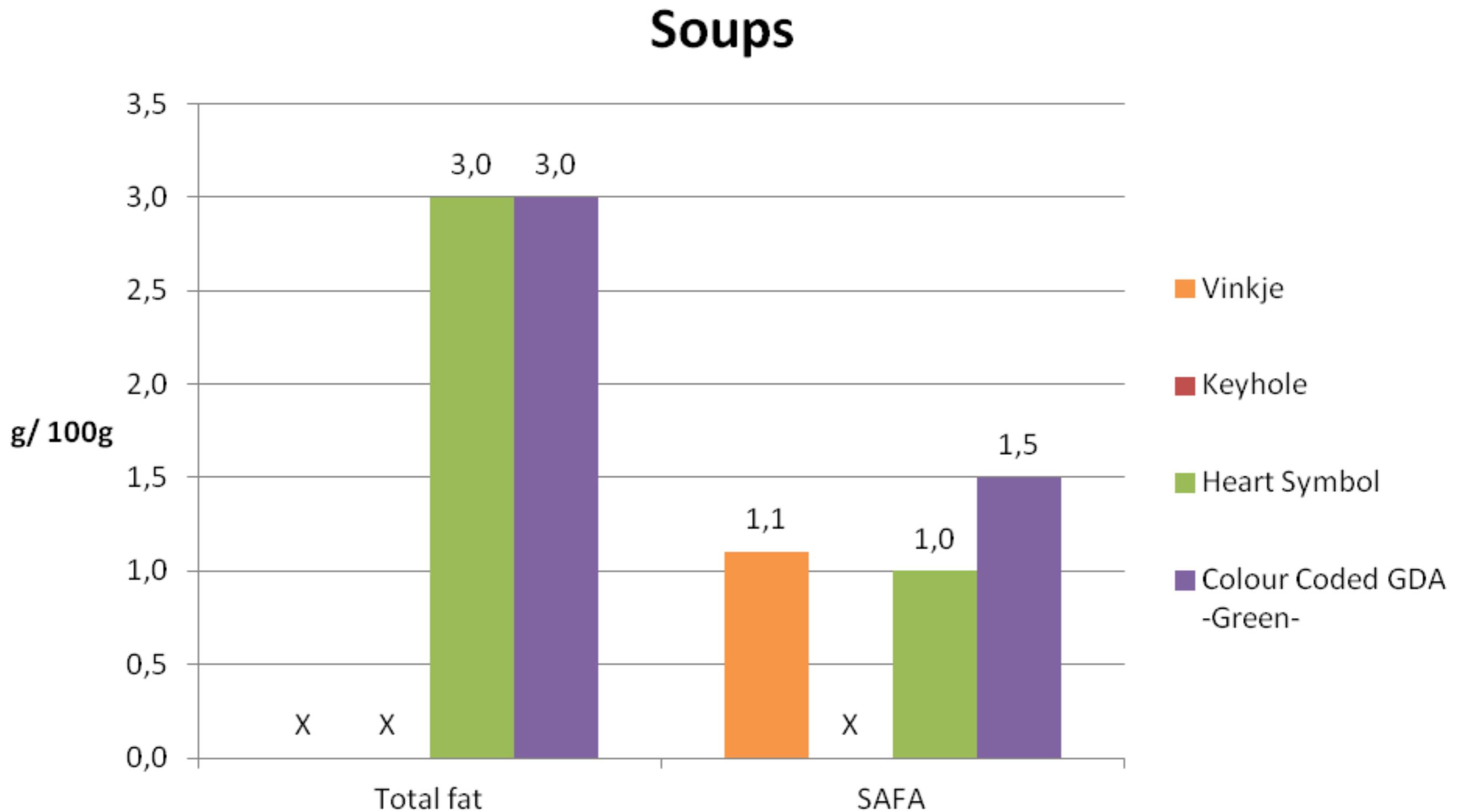
Breakfast cereals



Soups

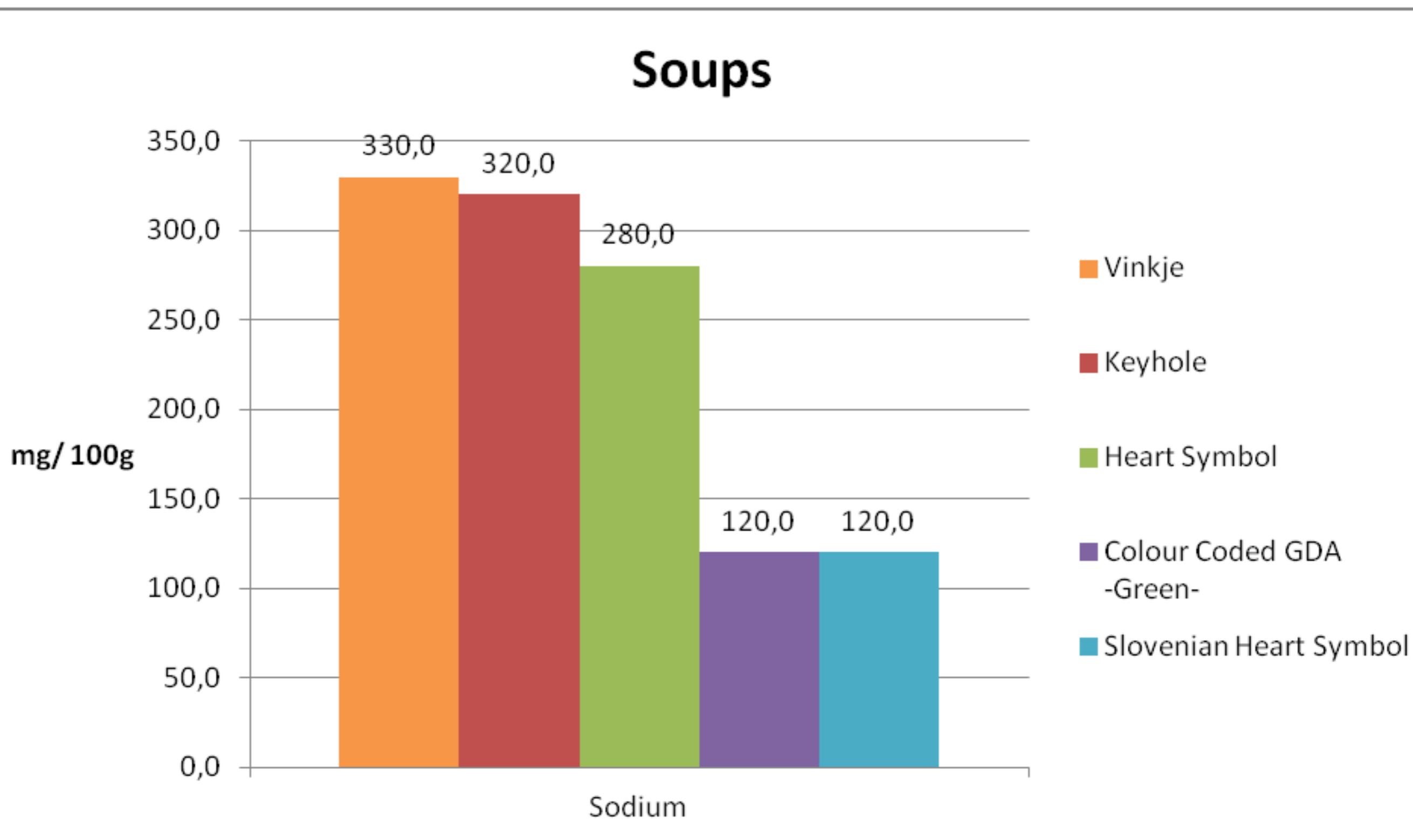
Vinkje	Keyhole	Heart Symbol	Colour Coded GDA	Slovenian Heart Symbol
Soups All types of soups and broths.	29) Soups with meat and fish (final products and the kind of products to be made in accordance with preparation instructions) that contain – a minimum of 100 kcal (420 kJ) per portion and – at least 28 g root vegetables, leguminous plants (excluding peanuts) and other vegetables (excluding potatoes) or fruit and berries per 100 g of the product. Any grain element shall satisfy the whole grain condition in the food group in question. If gluten free pasta is included, the fibre condition in food group 10 will apply.	Soups and soup bases	Foods	Detailed information to be retrieved

Soups - total fat, SAFA



Soups - sodium

Comparison major FOP schemes, including Slovenia



Processed meat

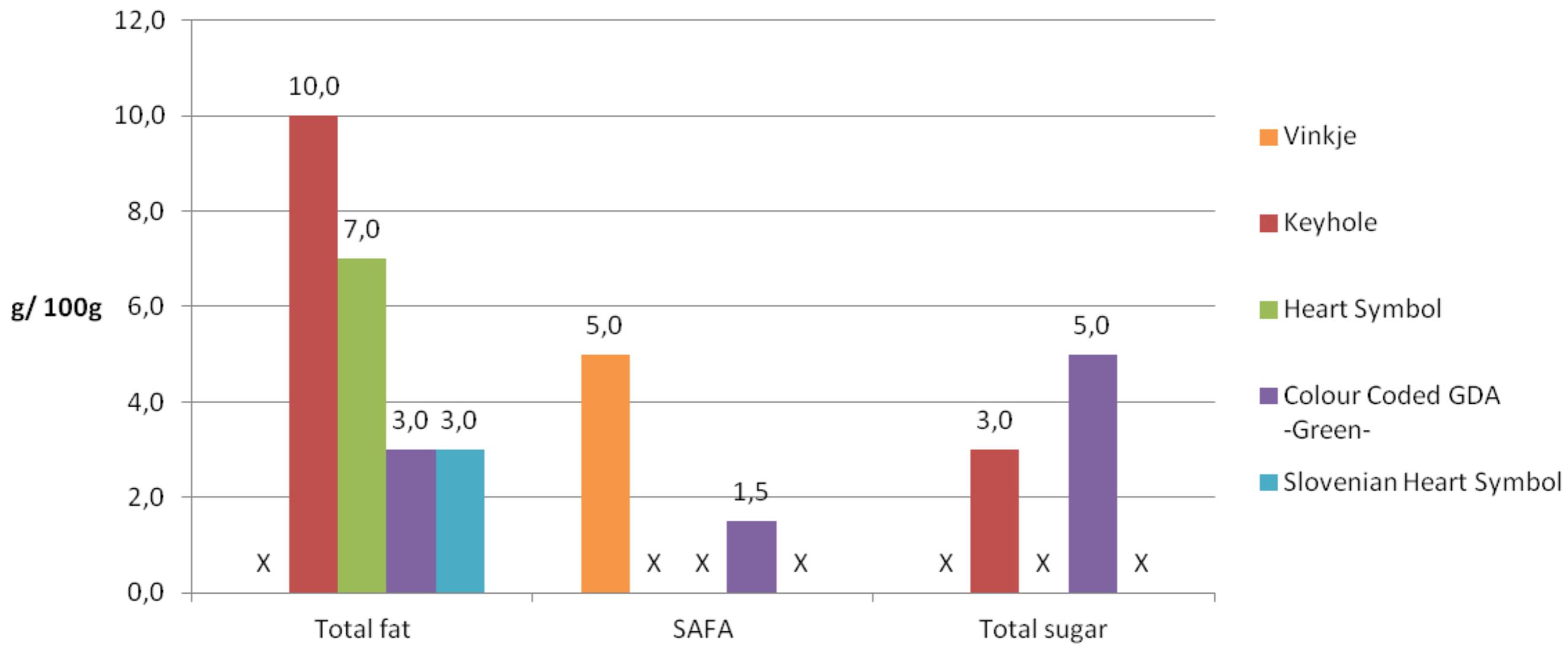
Vinkje	Keyhole	Heart Symbol	Colour Coded GDA Foods	Slovenian Heart Symbol
<p>Processed meat, meat products and meat substitutes</p>	<p>24a) Raw products made from whole or carved pieces of meat that are surface marinated or seasoned.</p>	<p>Seasoned or marinated meat</p>	<p>Foods</p>	<p>Detailed information to be retrieved</p>
<p>All types of processed meat/poultry, meat products and (vegetable) meat substitutes.</p>	<p>Products produced from a minimum of 50% meat.</p>	<p>In marinade: Hard fat max 20% of the total fat.</p>		
<p>Meat substitutes have to include two of these nutrients, containing at least the following quantities per 100 g: Retinol-equivalent (70µg), Vitamin B1 (0,11mg), Vitamin D (0,5µg), Iron (0,8mg), Vitamin B12 (0,24µg).</p>	<p>For liver pate in food group 24 b) the requirement is a minimum of 35% meat.</p>	<p>Sodium (meat + marinade) max 350 mg/100 g</p>		
<p>OR be produced from a minimum of 70% meat.</p>	<p>For products where a minimum of the raw meat products is replaced by a raw vegetable product containing protein, the products shall contain at least 40% meat.</p>			
	<p>The products may contain sauce or liquid. The percentage and conditions concern those parts of the product intended for consumption.</p>			
	<p>The products may be coated with breadcrumbs but the preparation instructions must not add fat to the product.</p>			

Processed meat - total fat, SAFA, total sugar

Comparison major FOP schemes, including Slovenia



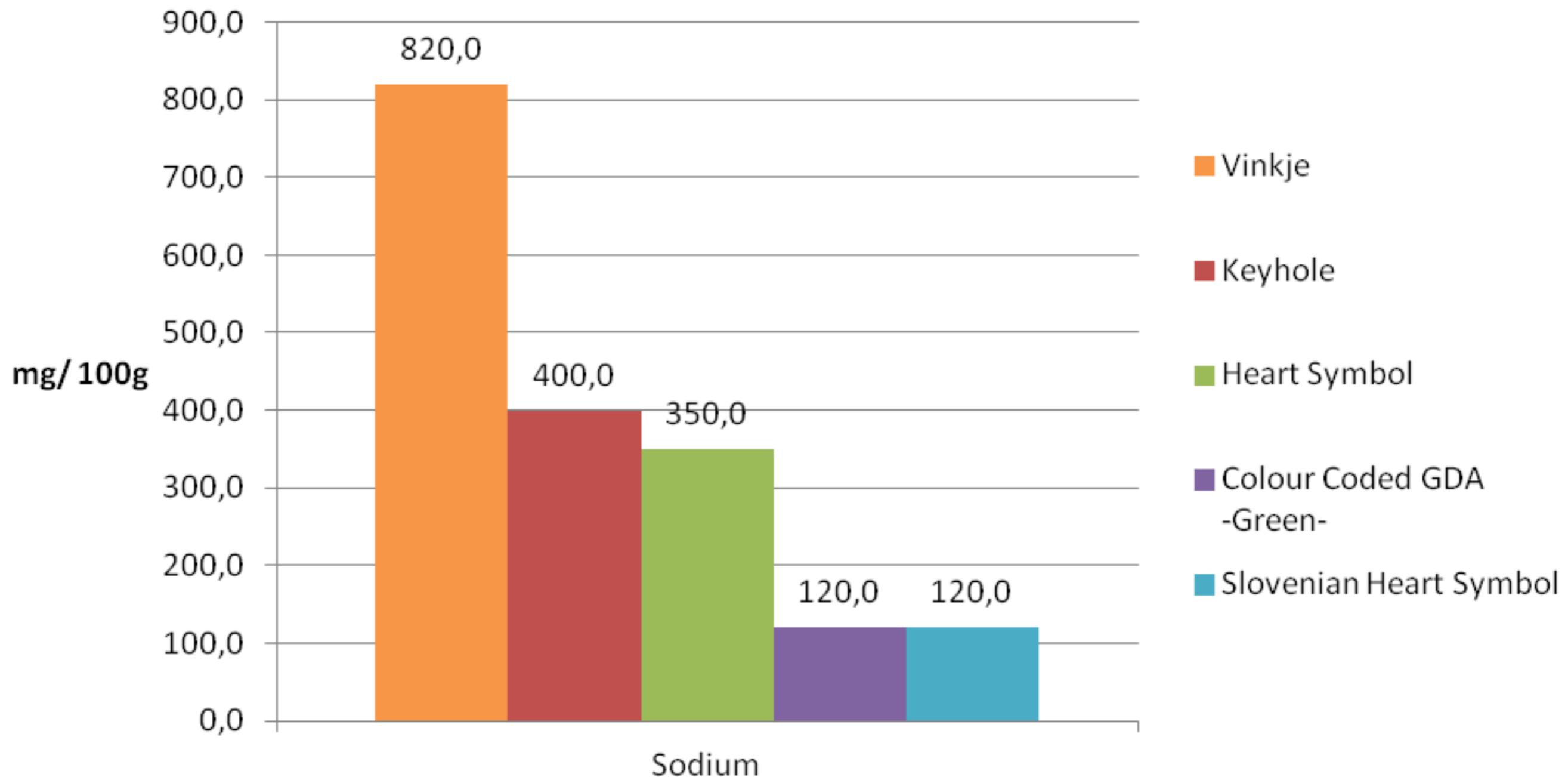
Processed meat



Processed meat - sodium

Comparison major FOP schemes, including Slovenia

Processed meat

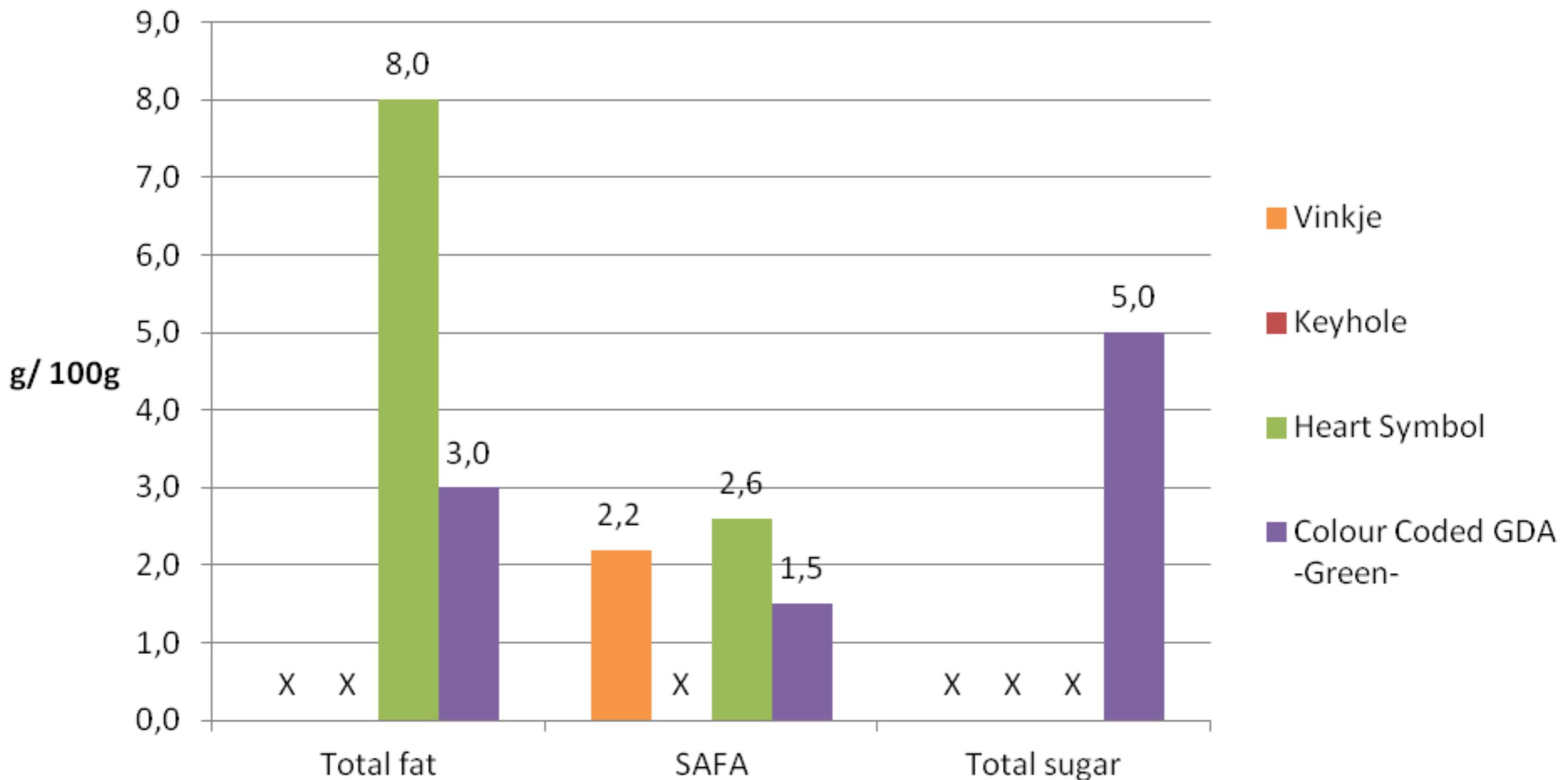


Sandwiches/ rolls

Vinkje	Keyhole	Heart Symbol	Colour Coded GDA	Slovenian Heart Symbol
<p>Sandwiches/rolls</p> <p>All types of ready-to-eat filled sandwiches/rolls, with a bread component of $\leq 80\text{g}$.</p> <p>If all the components of the sandwiches/rolls meet the criteria of their product groups, and the sandwiches/rolls in total meet the criteria for energy and fibre, the sandwiches/rolls will meet the logo criteria.</p>	<p>28) Sandwiches, baguettes, wraps and similar products, based on grain that contains</p> <ul style="list-style-type: none"> – a minimum of 150 kcal (630 kJ) per portion and – at least 25 g root vegetables, leguminous plants (excluding peanuts) and other vegetables (excluding potatoes) or fruit and berries per 100 g of the product. <p>The grain element shall contain at least 30 % whole grain, calculated on the basis of the product's dry matter content. If a gluten free grain element is included, it is the case that it shall contain at least 10 % whole grain calculated on the basis of the product's dry matter content.</p>	<p>Sandwiches and different kinds of meals made of bread (e.g. taco's, tortilla's, hamburger, panini)</p> <p>The bread must contain min 6% of fibre.</p>	<p>Foods</p>	<p>Detailed information to be retrieved</p>

Sandwiches/ rolls - total fat, SAFA, total sugar

Sandwiches/ rolls

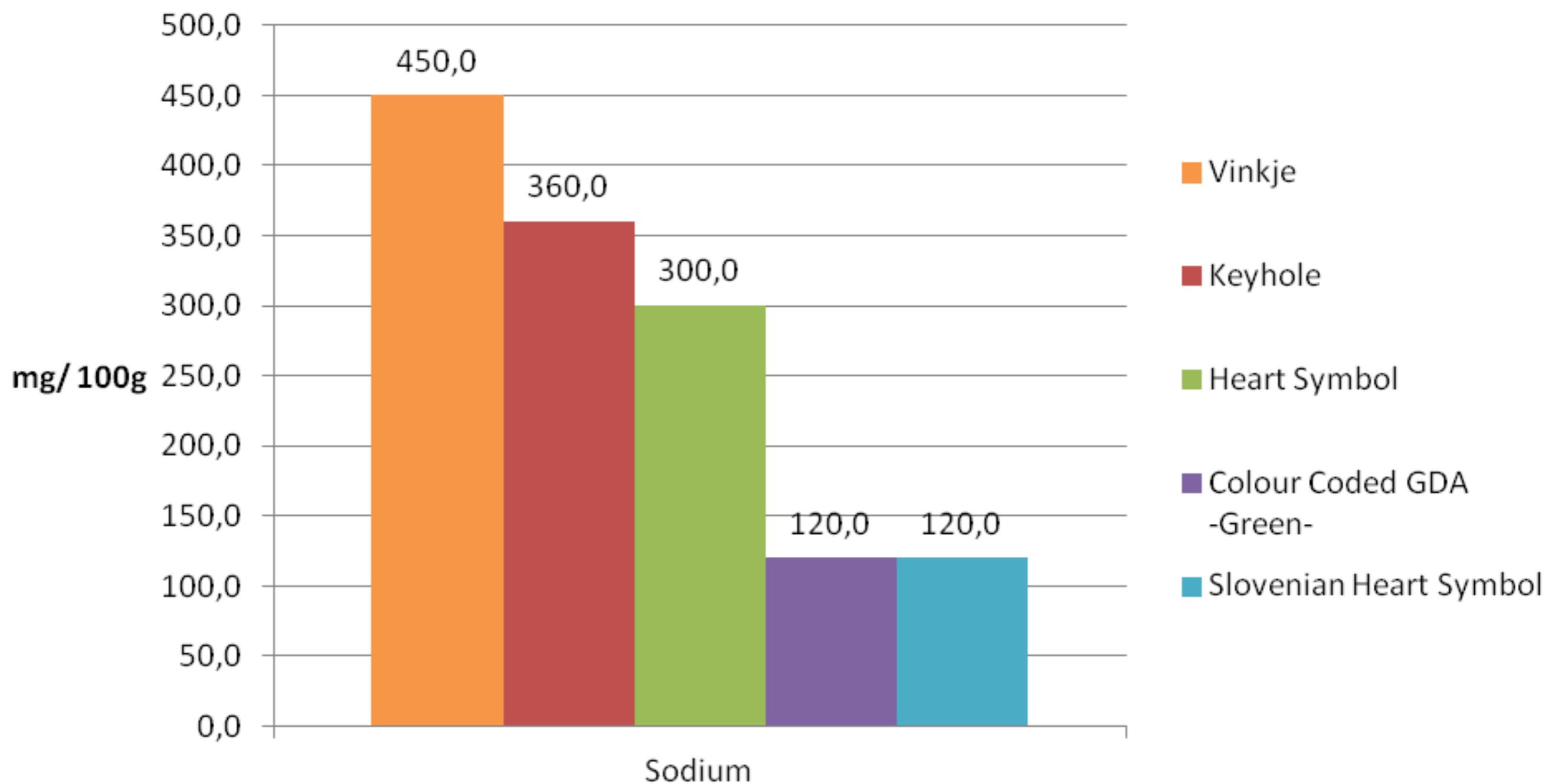


Sandwiches/ rolls - sodium

Comparison major FOP schemes, including Slovenia



Sandwiches/ rolls



Observations (1/2)

Differences in cut-off points were observed, due to different sub group definitions and/or adaption to national eating habits/ market. This is reflected in:

- Bread: national recipes differ
- Milk: every country has its own standards for milk e.g. magere, halfvolle en volle melk in the Netherlands
- Sandwiches/ rolls products: e.g. total fat cut-off point in Heart Symbol is high, due to differences in sub group definitions
- Breakfast cereals: e.g. total fat cut-off points in Keyhole and Heart Symbol are high (5g versus 3g), sugar criterion in Vinkje is high.
 - Different definitions? Is high fat and sugary granola included in Heart Symbol? Vinkje includes all types.
- Processed meat: e.g. total fat cut-off point in Keyhole is high, due to differences in sub group definitions

Observations (2/2)

Not regarded as relevant/ priority, and therefore not reflected in graphs

- Sugar in soup
- Sodium and sugar in milk and fermented milk

Other

- Breakfast cereals: sodium levels are comparable between Vinkje, Keyhole and Heart Symbol.
- Processed meat: Vinkje allows the highest salt level.
- Bread: Latvia has a lenient salt criterium for bread, but this scheme has a different aim. Nutrition is not the most important aspect as focus is on national production and food quality.

Maximum levels Slovenian Heart Symbol



Sub group	Total fat	SAFA + TFA	SAFA	TFA	Salt	Added sugar	Total sugar
General					0.3 g/100g or 100 ml	5.0 g/100g or 2.5 g/100ml	
Bread					0.3 g/100g or 100 ml	5.0 g/100g or 2.5 g/100ml	
Breakfast cereals					0.3 g/100g or 100 ml	5.0 g/100g or 2.5 g/100ml	
Dairy based drinks	1.5 g/100ml 1.8 g/100ml for semi- skimmed milk	1.5 g/100g 0.75 g/100ml			0.3 g/100g or 100 ml	5.0 g/100g or 2.5 g/100ml	
Processed meat	3.0 g/ 100g	1.5 g/100g			0.3 g/100g or 100 ml	5.0 g/100g or 2.5 g/100ml	
Sandwiches/ rolls					0.3 g/100g or 100 ml	5.0 g/100g or 2.5 g/100ml	
Soups					0.3 g/100g or 100 ml	5.0 g/100g or 2.5 g/100ml	

Maximum levels Latvian Green/ Claret spoon

Sub group	Total fat	SAFA + TFA	SAFA	TFA	Salt	Added sugar	Total sugar
Bread				1.0/ 100g	1.25 g/ 100g		

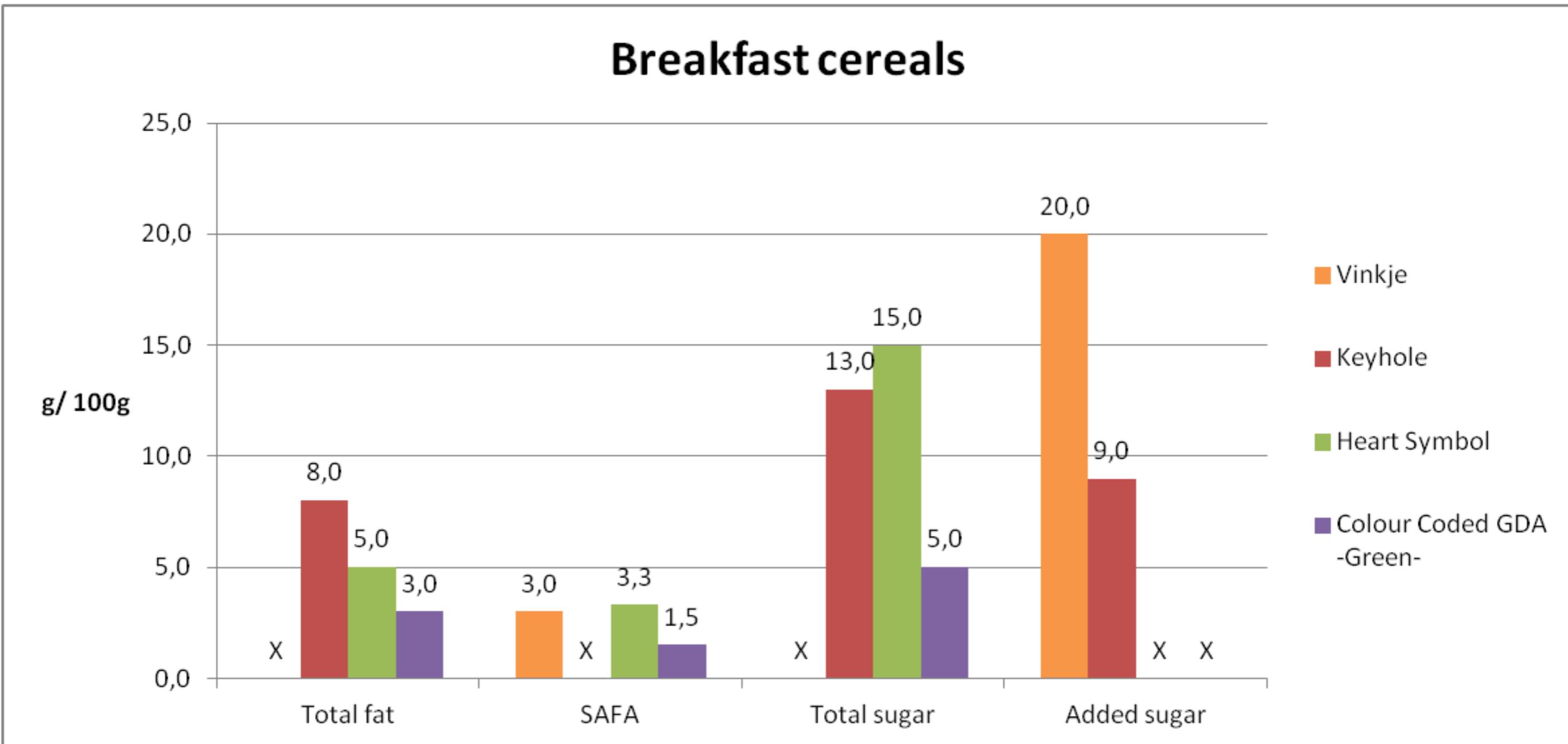


ANNEX 4:

Choice of sub group as well as the definition of nutrients has an effect on the observation

Breakfast cereals

The choice of sub group as well as the definition of nutrients determines the observation.



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