

NUTRI-SCORE FREQUENTLY ASKED QUESTIONS

SCIENTIFIC & TECHNICAL



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Scientific and Technical FAQ

I. Calculating the Score

HOW IS THE NUTRITIONAL SCORE CALCULATED?

The nutritional score is calculated using the data from the nutritional declaration for 100g of the product as sold.

Note: see the special rubric for reconstituted products

WHAT REFERENCE IS USED TO CALCULATE THE FRUIT AND VEGETABLE CONTENT OF PROCESSED PRODUCTS?

A worksheet for calculating processed fruit and vegetable content is attached as Appendix 1.

It is based on the reference document for calculating the fruit and vegetable content: *'Application of the Nutrient profiling model: Definition of 'fruit, vegetables and nuts' and guidance on quantifying the fruit, vegetable and nut content of a processed product - Peter Scarborough, Mike Rayner, Anna Boxer and Lynn Stockley - British Heart Foundation - Health Promotion Research Group, Department of Public Health, University of Oxford - December 2005'*.

DO CONCENTRATED JUICES COUNT WHEN WORKING OUT FRUIT AND VEGETABLE CONTENT?

With regards to concentrated fruits and vegetables:

Can be counted: fruit juices made from 100% concentrates

E.g. orange juice made from 100% concentrate that is rehydrated to 100% (or coconut juice when rehydration results in 100% juice)

Cannot be counted: concentrated fruit juice sugars or if juices that have not been rehydrated to 100%

E.g. concentrated lemon syrup used in a sorbet cannot be counted as fruit

SHOULD THE NSP OR AOAC METHOD BE USED FOR FIBRE?

The reference method is the **AOAC** method.

The recommended methods are AOAC 985.29 and AOAC 991.43.

It is possible to use a generic table, however testing will still be carried out in line with the AOAC method.

WHAT COUNTS AS A SIMPLE SUGAR?

Simple sugars include mono and disaccharides.

HOW IS THE FINAL SCORED DETERMINED?

The overall 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 (up to 11) can cause the favourable points to vary depending on whether points for protein have been counted (see special rules).

The score calculation method is detailed in Appendix 2.

WHEN CALCULATING THE SCORE, SHOULD THE RESULTS BE ROUNDED?

Example: if the simple sugar content is 9.001, will the system count the rounded value as 9 and thus assign 1 point, or will it find that $9.001 > 9$ and assign 2 points?

Points are assigned for a given nutrient based on the content of the nutrient in question in the food, with a **rounded value corresponding to one additional number** with regard to the point attribution threshold. When calculating the score for [fibre](#), thresholds are defined to one decimal place. For [sugars](#), thresholds are defined to round numbers or to one decimal place. For [proteins](#), thresholds are defined to one decimal place, except for the upper threshold which is defined to a round number. All others are always defined to a round number with no decimal places ([energy](#), [saturated fatty acids](#), [sodium](#), [fruit and vegetables](#), [total saturated fatty acids/lipids ratio](#))

For the given example, the threshold is 9g/100g (2 points are counted if the simple sugar content is greater than 9 and 1 point is counted if the content is less than or equal to 9), and the number is rounded to one decimal place. For a measurement of 9.001, the figure is rounded to 9.0. Thus, only 1 point is assigned. If the content were 9.05 or 9.06, then the rounded figure would be 9.1 and 2 points would have to be assigned. Using the same simple sugar example: for a threshold of 4.5 (1 point if the value is greater than 4.5g/100g, and 0 if it is less than or equal to it), the rounded figure includes two decimal places. For a product with a value of 4.502, the rounded value is 4.50 and no points are assigned. For a product with a value of 4.505 or 4.506, the rounded figure is 4.51 and one point is assigned.

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**.

When the salt value is expressed in centigrams (2 decimal places if expressed in grams), then the rounding rule described in the 'When calculating the score, should the results be rounded?' section of this FAQ apply.

To avoid the rare but conceivable discrepancies in points assigned to the 'sodium' component in the score calculation process resulting from converting the amount of salt listed in the nutritional declaration into sodium, the solution is to privilege salt content expressed in mg (3 decimal places if expressed in grams) and include it in the nutritional declaration on the package. The declared value is calculated according to the methods described in Articles 31-4 of EU regulation no. 1169/2011.

HOW ARE COMPOSITE PRODUCTS CALCULATED?

In the case of a prepared dish sold with a sauce packet

The nutritional score is calculated using the nutritional data listed on the package for 100g of the product, whose nutrients form part of the mandatory nutritional declaration or are included as supplemental information, in accordance with Article 30 of the INCO regulation no. 1169/2011, as for the dish + sauce example.

If two nutritional statements are provided, two Nutri-Scores may be displayed on the front – [there is a graphic charter available for displaying 2 Nutri-Scores on the front](#).

HOW ARE SCORES FOR RECONSTITUTED PRODUCTS CALCULATED?

In accordance with the methodology presented by *Rayner et al.*, nutritional values used to calculate the score must be considered for the product **as sold** based on the amount in 100g of the food (or 100ml for drinks).

Certain **exceptions** are made for products which have a **standardised reconstitution recipe following the exact recipe described by the manufacturer on the package and which cannot be reasonably consumed as-is**, thus solely for:

- Concentrated, dehydrated and freeze-dried products such as dehydrated soups and purees for which reconstitution must only involve adding milk and/or water
- Chocolate powders for which reconstitution methods are described on the package
- Syrups for which reconstitution only involves adding water
- Cakes or other desserts for which the exact recipes are described on the package by the manufacturer

For reconstitutions with milk, if the type of milk is not indicated, then **semi-skimmed milk** will be considered the **default**.

Thus, these exceptions do not apply to:

- This **exception does not apply to pasta, rice and other grains**, as the Nutri-Score is calculated using nutritional values as sold (dry).
- It **does not apply to breakfast cereals**, as the Nutri-Score is calculated for the cereals and not for the cereal + milk reconstitution.
- **Ready-to-use products (ready-to-bake dough or crusts)**, for which the Nutri-Score is calculated as sold.
- Condiments or sauces that can be used for a wide range of different recipes.

IS THE NUTRI-SCORE CALCULATED FOR THE PRODUCT WITH THE COVERING LIQUID?

For foods sold **with a covering liquid that is not commonly consumed** (tinned green beans, pickles, etc.), the Nutri-Score is calculated for the net product after draining.

[Conversely, for products such as fruits in syrup, where consumers may be likely to consume the syrup accompanying the fruit, the Nutri-Score is calculated for the fruit + syrup.](#)

WITH LIQUID FOODS, IS THE SCORE CALCULATED FOR 100 G OR 100 ML?

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

II. Modifying the Score for Foods and Beverages

WHICH ADDED FATS ARE COVERED BY THE MODIFIED NUTRI-SCORE?

'Added fats' refer to fats sold as finished products, not to fats used as ingredients in a recipe. For instance, the following are considered **added fats: vegetable oils, margarines, butter and cream.**

However, cream used in a recipe (or butter, sunflower oil, etc.) will be included in the overall score for the recipe, using the information from the nutritional declaration for 100 g of the food. Recipes are considered in their entirety as a mixture of ingredients, including any fats. The score applies to the final mixture. As is the case for fats, cheeses (which, like fats, are also excepted when calculating the score) are not considered separately when included in a recipe.

WHICH CHEESES ARE COVERED BY THE NUTRI-SCORE MODIFICATION?

The following are considered cheeses, as defined by Decree 2007-628, when calculating the modified score:

- **Cheeses**
- **Processed cheeses**
- **Cheese specialties**

However, quark ***is not considered*** cheese for the purposes of calculating the Nutri-Score.

- *Calculations for this product category are performed the same way whether it is cheese or not, as products rarely have a score higher than 11 for their 'negative' component, which means their protein content is counted.*
- *spreadable plant-based foods.*

WHICH BEVERAGES ARE COVERED BY THE NUTRI-SCORE MODIFICATION?

The Nutri-Score modification applies to the following beverages **if they include a nutritional declaration**:

- **Mineral water and spring water** (score A – dark green)
- **Flavoured water;**
- **Fruit juices, nectars and smoothies**
- **Drinks with added sugar and/or sweeteners**
- **Tea, infusions or coffee reconstituted exclusively with water**

However, milk, drinkable yoghurt, flavoured or chocolate milk beverages *containing more than 80% milk*, beverages reconstituted with a liquid other than water, and *plant-based drinks* are not considered beverages for the purposes of calculating the Nutri-Score.

The energy, total sugars and fruit and vegetables columns in the conversion grid for drinks replaces those used for other food categories. The other columns (saturated fatty acids, salt, fibre) remain similar and must be taken into account.

DOES IT APPLY TO ALCOHOLIC DRINKS?

As they are not subject to nutritional declarations per Article 16.4 of the INCO regulation from 25/10/2011, the Nutri-Score **does not apply** to alcoholic drinks containing more than 1.2% alcohol.

III. Foods Covered by the Nutri-Score

WHICH PRODUCTS ARE COVERED BY THE NUTRI-SCORE?

The food products covered by the Nutri-Score are those with a mandatory nutritional declaration in accordance with regulation no. 1169/2011, known as the INCO regulation. *Except for very specific cases discussed elsewhere in this FAQ, the available data on the mandatory nutritional declaration is that which must be used to calculate the Nutri-Score.*

It is possible, however, to display a Nutri-Score on a food product that is not covered, provided it has nutritional labelling (pre-packaged meats or vegetables, for instance).

WHICH PRODUCTS ARE NOT COVERED BY THE NUTRI-SCORE?

Food products that are not covered by the mandatory nutritional declaration are listed in Appendix V of regulation no. 1169/2011. They are:

1. Unprocessed products that comprise a single ingredient or category of ingredients (such as fresh fruits or vegetables, cut raw meat, honey, etc.)
2. Processed products where the only processing they have been subjected to is maturing and that comprise a single ingredient or category of ingredients

Note: here the products in question are mainly meat products

3. Waters intended for human consumption, including those where the only added ingredients are carbon dioxide and/or flavourings
4. Herbs, spices or mixtures thereof
5. Salt and salt substitutes
6. Table top sweeteners
7. Products covered by Directive 1999/4/EC of the European Parliament and of the Council of 22 February 1999 relating to coffee extracts and chicory extracts, whole or milled coffee beans, and whole or milled decaffeinated coffee beans

8. Herbal and fruit infusions, tea, decaffeinated tea, instant or soluble tea or tea extract, decaffeinated instant or soluble tea or tea extract, which do not contain other added ingredients than flavourings which do not modify the nutritional value of the tea
9. Fermented vinegars and substitutes for vinegar, including those where the only added ingredients are flavourings
10. Flavourings
11. Food additives
12. Processing aids
13. Food enzymes
14. Gelatine
15. Jam setting compounds
16. Yeasts
17. Chewing gums
18. Food in packaging or containers the largest surface of which has an area of less than 25 cm²
19. 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

To this point, it should be noted that the exemption criteria are considered cumulatively, meaning that the concept of 'small quantities' must be considered alongside all the other criteria.

- *With regard to 'local retail establishments directly supplying the final consumer'*

'Retail shops' include large and medium-sized shops and supermarkets as well as convenience stores that sell food.

- *With regard to the concept of 'local'*

A radius of around 100 km at the departmental and regional level seems acceptable. This distance could be extended for producers located in less densely populated areas that develop distribution channels with consumers and retailers (gourmet shops, cheese shops, etc.) in the closest urban centres (such as the Paris metropolitan area for the Burgundy and Centre regions). This analysis applies to cross-border trade when compliant with the recommendations of the member state in question.

- *With regard to the 'directly supplying the final consumer' criterion*

A producer directly supplying the final consumer includes producer sales through farms, markets, short supply chains, CSAs, and production shops such as those run by artisans (butchers, delicatessens, fishmongers, bakeries, etc.), and also internet sales, as long as these sales do not constitute the sole source of revenue for the producer.

Products displayed during trade fairs in order to promote regional products may also be included.

In the vast majority of cases, when the above criteria are fulfilled the producer to whom this measure applies de facto satisfies the criterion of 'small quantities' as understood by the law.

In addition to the criteria listed above, the amount of foodstuffs produced by operators that meet the national definition of a microenterprise as described in Article 3 of Decree no. 2008-1354 from 18 December 2008 relating to the criteria that determine whether a company belongs to the category for statistical and economic analysis purposes can be considered as falling under the definition of 'small quantities'; these companies employ fewer than ten people and have a total annual sales revenue or total assets of no more than 2 million euros.

CAN THE NUTRI-SCORE BE DISPLAYED ON PRODUCTS THAT ARE NOT SUBJECT TO MANDATORY NUTRITIONAL DECLARATIONS?

The Nutri-Score can be displayed on food products that are not subject to mandatory nutritional declarations, e.g. the list of food products not covered by INCO in Appendix V of INCO regulation no. 1169/2011 (unprocessed products made of one ingredient or one category of ingredients (fresh fruits and vegetables, cut raw meat, honey, etc.) and water), **but only if they possess a nutritional declaration** that complies with the INCO regulation.

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

IF THERE IS A BUSINESS RELATIONSHIP BETWEEN A CLIENT COMPANY AND ITS SUPPLIER, CAN THE NUTRI-SCORE OF A RECIPE'S "INGREDIENTS" BE USED WITHOUT SIGNING UP TO NUTRI-SCORE?

Where there is a business relationship between two companies, the technical datasheet of the "ingredient", intended for the manufacturer and not the final consumer, may include a Nutri-Score letter without the manufacturer having to apply it for all the products in its brand that are marketed to the final consumer in stores or online.

FOR ASSORTMENTS, MUST MULTIPLE NUTRI-SCORES BE DISPLAYED?

For assortments:

- When the nutritional values are different, one Nutri-Score for each nutritional declaration must be displayed; [Santé publique France offers a graphic charter that makes it possible to display several Nutri-Scores on the front.](#)
- In the event that the nutritional tables produce the same Nutri-Score result, a single Nutri-Score can be displayed on the front (in the case of a compote with different flavours or products with one average nutritional statement)
- If this is an assortment where each person is expected to consume the entire product, an average Nutri-Score can be calculated (such as a 'dessert sampler' assortment comprising a crème brûlée, a macaroon and a chocolate cake for each person, which are consumed as a single product)

IV. Legal Issues Pertaining to the Nutri-Score Plan

WHEN CAN THE NUTRI-SCORE BE USED?

'Nutri-Score' is a Santé Publique France registered trademark. Any eligible person wishing to use the trademark may now register on the Santé Publique France website and download the documents required to use Nutri-Score:

<http://www.santepubliquefrance.fr/Sante-publique-France/Nutri-Score>

WHO MAY DISPLAY THE NUTRI-SCORE LOGO ON THEIR BRANDS AND PRODUCTS?

Use of the Nutri-Score trademark is reserved for producers and distributors of products marketed in France and/or Europe.

HOW CAN THE DOCUMENTS REQUIRED TO USE THE NUTRI-SCORE BE OBTAINED?

To obtain these documents, the user must register on the following website (French only): https://tps.apientreprise.fr/commencer/enregistrement_Nutri-Score, by clicking on the green button labelled 's'inscrire'.

They will then provide their contact information and details about their company (SIRET number, VAT number, etc.) as well as information about which product segments will receive the Nutri-Score.

Once all the required information has been provided and the application has been submitted, the applicant will receive an email containing a link to the documents required to use the Nutri-Score (as a .zip file).

HOW ARE THE NUTRI-SCORE SCORES CALCULATED?

A calculation algorithm recommended by public authorities and intended for use by professionals wishing to take part in the plan will be provided in the first quarter of 2018. It is being developed by INRA. In the meantime, product scores can be calculated by using the information available in the appendices of the regulation on the use of the Nutri-Score trademark (French only): <http://www.santepubliquefrance.fr/Sante-publique-France/Nutri-Score>

In addition, software publishers that have already developed programs for calculating the Nutri-Score must comply with all the calculation guidelines laid out in the Nutri-Score usage regulation and obtain a licence from Santé Publique France.

For more information, consult the note on the nutritional information system from the High Council of Public Health (HCSP) (French only): <http://www.hcsp.fr/explore.cgi/avisrapportsdomaine?clefr=519>.

IS IT POSSIBLE TO CONDUCT A TEST PHASE BEFORE COMMITTING?

To obtain the required documents for using the logo, you must register on the following site (French only): https://tps.apientreprise.fr/commencer/enregistrement_Nutri-Score .

Businesses have 24 months to put the logo on all the categories of food products that they market under their own brands. They could thus decide to put it only on products sold online at first. But the ultimate goal – that aligns with the use of the collective mark – is to display the Nutri-Score logo on the packages of every product a brand sells, for every format, mode or point of sale.

MUST OPERATORS PUT THE NUTRI-SCORE ON ALL THEIR BRANDS AND ON ALL THE PRODUCTS FOR THE SAME BRAND?

Decree no. 2016-980 from 19 July 2016 on additional nutritional information for food products stipulates that 'the commitment made by the producers and distributors as part of the voluntary initiative to use the complementary form of presentation applies to all categories of food products that they market under their own brands'.

As a result, a company that owns several brands could choose to only put the Nutri-Score on one or some of its brands, but when used for a brand, it must be used for all categories of food products for that brand.

MUST THE NUTRI-SCORE ALSO BE PUT ON PRODUCTS MADE FOR THE FOODSERVICE INDUSTRY?

Companies commit to using it for all the ranges they sell under a brand, whatever the final destination of the product may be, as the INCO regulation also applies to products that will be used by communities. So, if the products for use by the foodservice industry are sold under the 'Alpha' brand, they must include the Nutri-Score

On the other hand, if the brand name is different (something other than 'Alpha'), the company is not obligated to put the Nutri-Score on a foodservice-only brand.

DOES THE NUTRI-SCORE APPLY OUTSIDE OF FRANCE?

The commitment made by producers and distributors as part of the voluntary initiative to use the recommended complementary form of presentation applies to all categories of food products that they sell on the French market under their own brands. The abovementioned Decree no. 2016-980 and the

order from 31 October 2017 determining the complementary form of presentation for the nutritional declaration recommended by the government (pursuant to Articles L. 3232-8 and R. 3232-7 of the Public Health Code) form part of the French regulation.

Thus, there is no obligation to put the Nutri-Score logo on products exported outside of France.

However, if a business also wishes to put the Nutri-Score on the market in one or more European Union member states, it is possible to do so while complying with the usage regulation.

CAN A REPRESENTATIVE COMPLETE THE NUTRI-SCORE REGISTRATION PROCESS?

Any eligible person who wishes to use the 'Nutri-Score' trademark notifies Santé Publique France of their intention by registering on the website:

https://tps.apientreprise.fr/commencer/enregistrement_Nutri-Score

A duly authorised representative would be fully capable of completing the registration process on behalf of a principal. Santé Publique France cannot be involved in handling and structuring the portfolio of brands for a producer or distributor wishing to use the Nutri-Score.

It is thus entirely possible to use the services of a representative, if the operator wishes. The representative must however complete one separate registration for each different principal.

WHY ARE THERE PENALTIES IN THE NUTRI-SCORE USAGE REGULATION?

Regarding the penalties mentioned by the usage regulation, it is important to remember that the usage regulation is concerned with protecting the Nutri-Score collective mark. This protection is thus grounded in intellectual property and industrial property rights (the trademark was registered with INPI and EUIPO).

As with any trademark, the purpose of the usage regulation is to protect industrial products and ensure the 'Nutri-Score' collective mark is used properly by businesses to prevent illegal behaviours, fraud and/or unfair competition. Thus, penalties are only invoked if businesses are using Nutri-Score incorrectly, for instance, displaying a false score, as this would be dishonest.

HOW CAN A COMPANY STOP USING THE NUTRI-SCORE?

After registering, the Operator has 24 months to put the Nutri-Score logo on all product categories available on the market.

The Operator may stop using the Nutri-Score for one or all of their brands at any time, provided Santé Publique France is informed of this change.

HOW CAN SOMEONE OBTAIN THE ENGLISH TRANSLATION OF THE NUTRI-SCORE USAGE REGULATION?

An English translation of the usage regulation is now available. It can be obtained by writing to nutriscore@santepubliquefrance.fr

IS IT POSSIBLE TO MODIFY THE NUTRI-SCORE USAGE REGULATION?

The usage regulation may not be modified by unilateral amendment: all the prerogatives must therefore be complied with in order to use the 'Nutri-Score' logo.

Article 9 of the usage regulation stipulates the methods by which modifications can be made.

IS IT POSSIBLE TO MODIFY THE NUTRI-SCORE GRAPHIC CHARTER?

As an integral part of the usage regulation to which it is appended, the graphic charter may not be unilaterally modified.

IS THERE A GRAPHIC CHARTER THAT LAYS OUT THE RULES FOR USING THE LOGO ON E-COMMERCE SITES?

For this application, 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 is perfectly 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 LOGO BE USED FOR PROMOTIONAL PURPOSES?

Article 6 of the usage regulation covers these provisions.

For generic communication regarding the Nutri-Score logo, the Operator can put the following on its communication media:

1. The Neutral Logo,
2. And/or at least 3 of the 5 Classifying Logos arranged in such a way as not to mislead the consumer regarding the classification of the brand's Products, in particular by implying that all of the brand's products have the same classification.

Communications regarding a Product must use the appropriate Classifying Logo in compliance with the provisions of Article 6.2 of the usage regulation.

HOW CAN THE NUTRI-SCORE LOGOS BE OBTAINED FOR EDUCATIONAL, SCIENTIFIC OR JOURNALISTIC PRESENTATIONS?

Certain logos can be obtained by writing to the nutriscore@santepubliquefrance.fr address and including a description of the intended use.

CAN THE NUTRI-SCORE MARK BE REPRODUCED WITHOUT PERMISSION FROM SANTÉ PUBLIQUE FRANCE?

Wherever the Nutri-Score is used as a trademark in business, prior written permission must be obtained from Santé publique France.

Appendix 1: Fruits and Vegetables

Definition of 'fruit, vegetables and nuts'
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Guidance on quantifying the fruit, vegetable and nut content of a processed product

Prior comment: only the fruits, vegetables, pulses and nuts that belong to the groups mentioned in this appendix (as per the foundational works of Scarborough et al.) are used to calculate the quantity of fruits, vegetables, pulses and nuts in a processed product.

By Peter Scarborough, Mike Rayner, Anna Boxer and Lynn Stockley. British Heart Foundation Health Promotion Research Group, Department of Public Health, University of Oxford. December 2005¹.



Abstract

A- To quantify the fruits, vegetables and nuts in a product when calculating the Food Standard Agency (FSA) score, the following foods should be counted:

✗ **Tubers** (potatoes, yams, taro, manioc, sweet potatoes, etc.) are excluded from the calculation.

✗ **Quinoa**, the nutritional composition of which is similar to that of cereals, is not considered a vegetable.

✗ **Spices** are not counted as vegetables when calculating the Nutri-Score, and are not included in the Eurocodes that are taken into account in the breakdown. They do not belong to generic group 8 (which contains vegetables), but to group 4 instead.

1) 'Fruit, vegetables, and pulses' include products from the following families:

I. Pulses:

- Peas (various types: chickpea, green pea, pigeon pea, etc.)
- Beans (various types: Lima, red, etc.)
- Lentils (various types: green, yellow, French, etc.)
- Cowpea, soya bean, carob bean, broad bean, etc.

II. Vegetables:

- Leaf vegetables: endive, lettuce (all types: leaf lettuce, arugula, escarole, etc.), spinach, lamb's lettuce, dandelion greens, nettle, beet greens, sorrel, etc.
- Brassicas: cabbage (all types: cauliflower, red cabbage, Brussels sprouts, curly kale, green cabbage, Chinese cabbage, watercress, radish, broccoli, etc.)
- Stalk vegetables: celery, fennel, rhubarb
- Shoot vegetables: asparagus, chicory, globe artichoke, palm hearts, bamboo shoots, taro shoots, etc.
- Onion, shallot, leek, garlic, **chive**, **parsley**, other herbs

¹ available at <https://www.food.gov.uk/sites/default/files/multimedia/pdfs/nutprofpguide.pdf>

- Root vegetables: carrot, salsify, celeriac, radish, parsnip, beetroot, chicory root
- Fruit vegetables: tomato, aubergine, cucumber, courgette, sweet pepper, chilli pepper, squash, various gourds, green banana, plantain, avocado, olive
- Flower-head vegetables: pumpkin flower
- Sprouted vegetables: pea, broad bean, sweet corn, soya bean
- Edible fungi
- Seaweeds and algae
- Olives

III. Fruits

- *Prunus* species fruit
- Apple, pear, quince, medlar
- Date, lychee, persimmon
- Berries, grapes, cherries, blackcurrants, strawberries, red currants, blackberries, cranberries, bilberries, etc.
- Citrus fruit: lemon, orange, grapefruit, kumquat, tangerine, etc.
- Banana, kiwi fruit, pineapple, melon, fig, mango, passionfruit, guava, papaya, pomegranate, cashew fruit, carambola, durian, rambutan, sweetsop, prickly pear, sapodilla, breadfruit, tamarillo, tamarind

2) Nuts include:

- Walnut, hazelnut, pistachio, cashew, pecan, coconut, peanut, almond

✗ Chia, poppy and sunflower seeds and pine nuts are not counted (Eurocode 7.30 is not considered by the FSA document)

B - Only fruits, vegetables, pulses and nuts, including those that are sliced, peeled, tinned, frozen, cooked, dried or minimally processed (such as juices or purees or obtained by grinding) should count for the purpose of calculating a score. Fruits, vegetables, pulses and nuts which have been subject to further processing (e.g. by converting them to concentrated juices, flours resulting in water loss, or oils) should not count.

C - Nuts, which are whole, roasted, chopped, grated and ground should count.

D - The weight of dried fruits, vegetables, pulses and nuts or pureed tomatoes should be multiplied by 2 (in the numerator and denominator) when calculating the amount in g per 100g of fruit, vegetables, pulses and nuts. No multiplier should be applied to the weight of juice and purees (other than tomato).

E - The amount of fruit and vegetables (in g per 100g) in the product can be calculated either before or after cooking.



Previous Version

The fruit, vegetables, pulses and nuts component of the Food Standard Agency (FSA) score was initially developed in the 2000's and was based on a food classification named Eurocode 2. An English version is available online:

https://www.researchgate.net/publication/267194254_Application_of_the_Nutrient_profiling_model_Definition_of_'fruit_vegetables_and_nuts'_and_guidance_on_quantifying_the_fruit_vegetable_and_nut_content_of_a_processed_product

Clarifications

The purpose of this document is to clarify certain points in order to standardise the manner in which the quantity of 'fruit, vegetables, pulses and nuts' in a food is evaluated so that the FSA score can be calculated. The points covered are:

1. whether tubers (especially potatoes) are included in the vegetables category when calculating the 'fruit, vegetables, pulses and nuts' component for the FSA score calculation.
2. How are 'nuts' defined?
3. Should pureed, concentrated, dried or powdered fruits, vegetables and pulses, as well as fruit and vegetable juices, be included when calculating the quantity of fruits and vegetables in a product to determine the score? If so, how are the amounts of these processed fruits and vegetables calculated?
4. Should the quantities of fruits, vegetables, pulses and nuts in a product be calculated before or after cooking?

1 & 2. DEFINING FRUITS, VEGETABLES, PULSES AND NUTS

The Eurocode 2 classification (in English) defines the food groups. Under this system 'Fruits' are defined as products in Group 9, 'Vegetables' as products in Group 8, pulses as products in Group 7.10, and nuts as products in Group 7.20 and 7.40.

✗ Tubers, particularly potatoes and other starchy vegetables (such as yams or manioc from Group 8.34) are excluded from the calculations.

✗ Pulse and maize flours are not counted for the fruit and vegetables calculations either.

The groups are defined according to that classification

- i. Group 7.10 (Pulses);
- ii. Group 8.10 (Leaf vegetables); 8.15 (Brassicas); 8.20 (Stalk vegetables); 8.25 (Shoot vegetables); 8.30 (Onion-family vegetables); 8.38 (Root vegetables); 8.40 (Fruit vegetables); 8.42 (Flower-head vegetables); 8.44 (Pod vegetables); 8.45 (Seed vegetables and immature pulses); 8.47 (Sprouted seed vegetables); 8.50 (Edible fungi); 8.55 (Seaweeds and algae); 8.60 (Vegetable mixtures)
- iii. Group 9.10 (Malaceous fruit); 9.20 (Prunus species fruit); 9.25 (Other stone fruit); 9.30 (Berries); 9.40 (Citrus fruit); 9.50 (Miscellaneous fruit); 9.60 (Fruit mixtures).
- iv. Group 7.20 (underground pulses); 7.40 (nuts)

Clarification:

- **Pickles** are a variety of *CUCUMIS SATIVUS*, like cucumber. In light of the botanical name, they are listed as vegetables.
- **Capers** are not listed, they are not included in vegetable calculations.

A list of the various foods in these codes is found in the abstract for this document located at the beginning of this appendix.

3. CALCULATING THE AMOUNT OF FRUITS, VEGETABLES AND PULSES IN PROCESSED PRODUCTS

The health benefits of fruits and vegetables are associated with the whole product, **due to the vitamins they provide**.

Processing can result in loss of fibre and vitamins. Therefore, it would not be appropriate for ingredients such as concentrated fruit juice sugars that are added to foods to increase sweetness to count for the purpose of calculating a score in the same way as intact fruit and vegetables.

Intact fruit and vegetables (including those that are cooked and dried) and minimally processed fruit and vegetables (sweetened, peeled, sliced, tinned, frozen, purees, pulp, grilled, salted or marinated) count for the purpose of calculating a score.

✗ *Banana chips do not count as they are too processed.*

Concentrated juices may be taken into account for the calculations, but only if they are composed of 100% juice.

However, fruits and vegetables that are subject to further processing (e.g. concentrated fruit juice sugars, powders, candied fruits, and fruits in stick form) do not count. The same applies to fruits and vegetables that have been dehydrated using a process that requires the addition of sugars or salt.

Calculating processed fruits, vegetables and pulses

Previous work has found that:

- 15-20g of dried fruit and 25-30g of ready-to-eat (semi-hydrated) fruit are equivalent to 80g of fresh fruit.
- 40g of dried pulses are equivalent to 80g of fresh pulses.
- 20g of tomato puree and 25g of tomato ketchup are equivalent to 80g of fresh tomato.

This would suggest that, for the purposes of calculating nutrient profiling scores, the amount of dried or pureed fruit or vegetable present in a food should be multiplied by a standard factor when calculating the amount per 100g of a product. However, this procedure could result in anomalous results. For example, if the amount of dried fruit in a 'fruit and cereal bar' were to be multiplied by 2, then a bar weighing 75g

and containing 50g dried fruit would appear to have a fruit content of $100/75 = 133\%$, despite there being 25g of non-fruit constituents.

That is why the decision was made to multiply the amount of fresh or pureed fruit or vegetable by an agreed amount and divide by the weight of the non-fruit/vegetable constituents, plus that of the fruit or vegetable multiplied by the agreed amount. A multiplier of 2 was viewed as optimal.

Therefore, so as not to over-emphasise their importance to a healthy diet, the weight of dried fruit and vegetables should be multiplied by 2 when calculating the amount of fruit and vegetables in 100g of food.

In the above example, using a multiplier of 2, the fruit content of the fruit and cereal bar would be: $(50 \times 2) / (25 + (50 \times 2))$ or $100/125 = 80\%$.

Applying a multiplier for pureed fruits or vegetables was considered. Pureeing (e.g. when making fruit smoothies) often involves no concentration of the product, whereas in some cases, such as during the manufacture of concentrated tomato puree, it does.

The multiplier of 2 should only be applied to prepared concentrated purees such as tomato puree. For a triple-concentrated tomato puree, the same multiplier of 2 is applied.

Clarifications:

- **Roasted foods** (roasted hazelnuts or almonds) are not considered to be dried because little water is lost during the roasting process.
- **Dried fruits and vegetables** such as dehydrated mushrooms are considered, taking into account rehydration for the finished products (see question with the suggested calculation).
- However, **freeze-dried fruits and vegetables** are **not** considered.

4. CALCULATING SCORE BEFORE OR AFTER COOKING

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

Clarifications

- **Coconut** presents particular issues because it is eaten in a different way to other nuts.

For coconuts:

- fresh coconut 'flesh' should be scored as fruit
- the 'water' in the centre of the coconut, which is part of the flesh, should be scored as fruit juice
- the juice squeezed from the flesh (coconut milk) is comparable with fruit juice and should be scored accordingly
- desiccated and dried block coconut are equivalent to dried fruit
- coconut which is processed beyond the original product should not be included.

- [For cooked tomato sauces](#), only the tomato and tomato concentrate in the composition may be considered as a fruit and vegetable.

5. SUMMARY OF RECOMMENDATIONS

a) The amount of fruits, vegetables, pulses or nuts in 100 g of food is calculated as follows:

The amount of f, v, p & n* in a product =

$$\frac{(\text{Weight of f, v, p \& n}) + (2 \times \text{weight of dried f, v, p \& n})}{(\text{Weight of f, v, p \& n}) + (2 \times \text{weight of dried f, v, p \& n}) + (\text{weight of non-f, v, p \& n ingredients})}$$

(Weight of f, v, p & n) + (2 x weight of dried f, v, p & n) + (weight of non-f, v, p & n ingredients)

*f, v, p & n: fruits, vegetables, pulses and nuts, including juices and purees other than tomato puree;
Dried f, v, p & n: includes tomato puree

The list of included fruits, vegetables, pulses and nuts is found on page 1

Tubers (potatoes, yams, taro, manioc, sweet potatoes, etc.) are excluded from the calculations

b) Calculating the quantity of fruits, vegetables and pulses in a processed product

Only intact and minimally processed fruits, vegetables and pulses should count for the purpose of calculating a score. Fruits and vegetables that have been subject to further processing should not count.

c) Calculating score before or after cooking

The amount of fruits and vegetables in the product (g per 100g) 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.

Two examples:

The recommendation made above would affect the nutrient model in the following way:

The amount of f, v, p & n* in a product =

$$\frac{(\text{Weight of f, v, p \& n}) + (2 \times \text{weight of dried f, v, p \& n})}{(\text{Weight of f, v, p \& n}) + (2 \times \text{weight of dried f, v, p \& n}) + (\text{weight of non-f, v, l \& n ingredients})}$$

(Weight of f, v, p & n) + (2 x weight of dried f, v, p & n) + (weight of non-f, v, l & n ingredients)

*f, v, p & n: fruits, vegetables, pulses and nuts, including juices and purees other than tomato puree;
Dried f, v, p & n: includes tomato puree

1. Suppose a portion of fruit cake weighing 150g consists of

- 15g of cherries,
- 25g of raisins,
- 15g of mixed nuts,
- 95g of other non-fruit, vegetable, pulse or nut ingredients

The calculated proportion of fruits, vegetables, pulses or nuts is thus:

$$\frac{(30 \text{ (i.e. cherries and nuts)} + (2 \times 25, \text{ i.e. raisins}))}{(30 + (2 \times 25) + 95, \text{ i.e. the other ingredients})} = 46\%$$

2. Suppose a pizza weighing 320g consists of

- 50g of cooked vegetables
- 20g of tomato puree
- 250g of other ingredients

The calculated proportion of fruits, vegetables or nuts is thus:

$$\frac{(50 \text{ (i.e. the vegetables)} + 2 \times 20 \text{ (i.e. the puree)})}{(50 + (2 \times 20) + 250 \text{ (i.e. the other ingredients)})} = 26\%$$

Appendix 2: Methods for Calculating the Nutritional Score

The nutritional score is distinct from the Nutri-Score:

- **The nutritional score** uses the nutrients and ingredients within the food that have a significant impact on health to derive a unique estimated value of the nutritional quality of the food on an ordinal scale ranging from "negative fifteen" -15 (more nutritious) to "positive forty" +40 (less nutritious).
- **The Nutri-Score** is a graphic scale that divides the nutritional score into 5 classes (expressed by a colour and a letter), the purpose being to help the consumer better see, interpret and understand the nutritional quality. The point 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. This also helps food producers to decide how to reformulate their products so they can move to a higher class and helps consumer think about their health as they are making choices about food.

The nutritional calculation algorithm as described in the order notified to the Commission and the method for determining Nutri-Score classification thresholds are publicly available; this was done to make the system more transparent and reproducible.

The nutritional score is calculated using the nutritional data listed on the package for 100g of the product, whose nutrients form part of the mandatory nutritional declaration or are included as supplemental information, in accordance with Article 30 of the INCO regulation no. 1169/2011:

- Calories (Kcal/KJ)
- Amount of fat (g)
- Amount of saturated fatty acids (g)
- Amount of carbohydrates (g)
- Amount of sugars
- Amount of protein (g)
- Amount of salt (mg)
- Fibre (g)

Through the vitamins they contain, fruits and vegetables are major contributors to public health and help ensure that the information provided is consistent with nutritional guidelines. They are also counted for the FSA score. As the food must comprise at least 40% fruit and vegetable content, the information is available in the ingredient list, to the extent that for these products, the fruits and vegetables are mentioned in the legal name of the product (Article 9 of INCO regulation no. 1169/2011, (Europa Summary of EU legislation 2012)).

Score Calculation Methods: General

- **General calculation methods**

The score comprises two dimensions: positive points (corresponding to the 'unfavourable' components, an excess of which is considered unhealthy: calories, sugars, sodium and saturated fatty acids²) and negative points (corresponding to 'favourable' components: fruits and vegetables, protein and fibre, an adequate amount of which is considered healthy).

- Between 0 and 10 points are awarded for each of these 4 'unfavourable' components, based on the amount in 100g of the food. Points are assigned based on the reference intake for the nutrient in question. First, the 'unfavourable' components are totalled, resulting in a number of positive points (maximum of +40).
- Between 0 and 5 points are awarded for the 3 'favourable' components (0 to 10 points for beverages), based on the amount in 100g of the food (maximum of -15).

Depending on the number of positive points, either all of the 'favourable' components are subtracted, or only the fibre, fruit and vegetable components, according to the following rules.

- If the total for the N component is less than 11 points, then the nutritional score is equal to the total N component points subtracted from the total for the P component.
- If the total for the N component is greater than or equal to 11 points and
 - If the total for 'fruits and vegetables' is equal to 5 (10 for beverages), then the nutritional score is equal to the total N component points subtracted from the total for the P component.
 - If the total for 'fruits and vegetables' is less than 5, then the nutritional score is equal to the total N component points subtracted from the sum of the points for 'fibres' and 'fruits and vegetables'. In this case, the protein content is therefore not taken into account in the calculation of the nutritional score.

The point table generally used to calculate the nutritional score is as follows:

- Points assigned for nutrients that have a negative impact on the nutritional score (N)

Points	Energy (kJ)	Simple sugars (g)	Saturated fatty acids (g)	Sodium (mg) ¹
0	≤ 335	≤ 4.5	≤ 1	≤ 90
1	> 335	> 4.5	> 1	> 90
2	> 670	> 9	> 2	> 180
3	> 1005	> 13.5	> 3	> 270
4	> 1340	> 18	> 4	> 360
5	> 1675	> 22.5	> 5	> 450
6	> 2010	> 27	> 6	> 540
7	> 2345	> 31	> 7	> 630
8	> 2680	> 36	> 8	> 720
9	> 3015	> 40	> 9	> 810
10	> 3350	> 45	> 10	> 900

¹: the sodium content corresponds to the salt content listed in the mandatory declaration divided by 2.5.

² See: EU framework for national initiatives on selected nutrients (salt, energy and saturated fatty acids, added sugars (2008,2011, 2015)

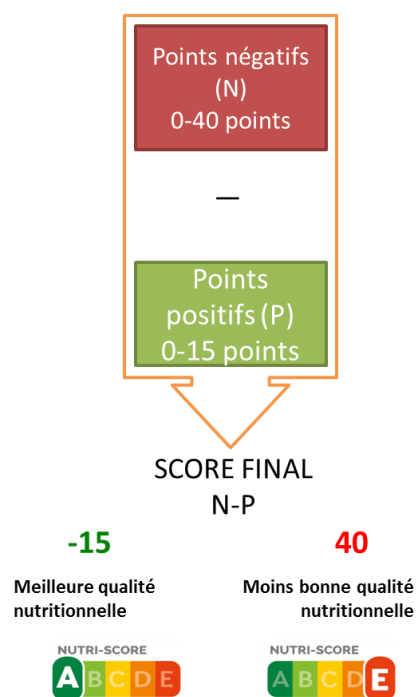
- Points attributed for nutrients that have a positive impact on the nutritional score (P)

Points	Fruits, veg (%)	Fibre (g)	Protein (g)
		AOAC	
0	≤ 40	≤ 0.9	≤ 1.6
1	> 40	> 0.9	> 1.6
2	> 60	> 1.9	> 3.2
3	-	> 2.8	> 4,8
4	-	> 3.7	> 6.4
5	> 80	> 4.7	> 8.0

The calculation is performed using the data from the table of nutritional values and the ingredient list. The point tables are modified for beverages and added fats.

Nutriment /100g	Points
Energie (KJ)	0-10
Sucres simples (g)	0-10
Acides gras saturés (g)	0-10
Sodium (g)	0-10

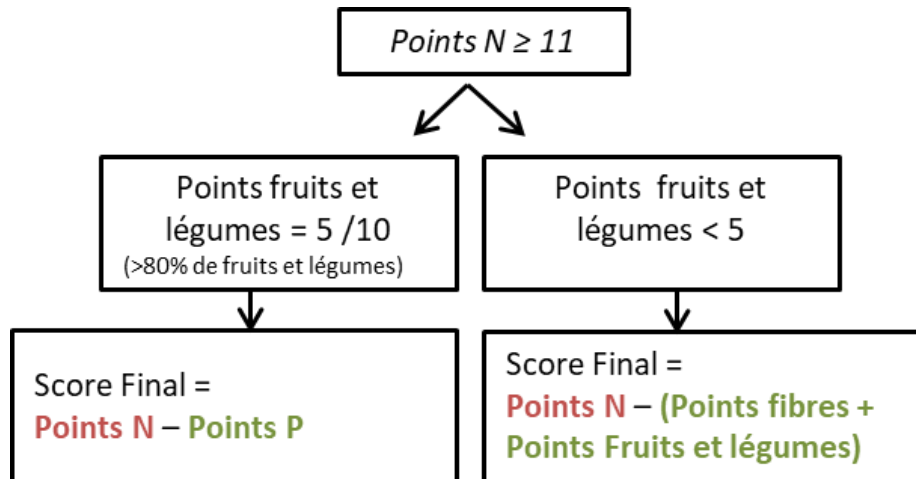
Elément /100g	Points
Fruits, légumes, légumineuses, noix (%)	0-5
Fibres (g)	0-5
Protéines (g)*	0-5



**Whether protein is counted depends on the number of N points and the amount of fruits and vegetables in the product*

Nutritional score = total N points – total P points

- Clarifications on the rule for counting protein



Methods for calculating the score: modifications

The main purpose of the Nutri-Score is to help the consumer determine what the nutritional composition of a given food product will contribute to a balanced diet. For each product category, the Nutri-Score helps reveal the degree to which product compositions vary in terms of the selected nutrients: depending on the category, products can be divided into 3 to 5 classes. **This is not true for added fats (oils, butter or cream), which are almost entirely made up** of fatty acids or for cheeses, which are grouped into only 1 or 2 classes (ANSES 2015a). For beverages, due to the lack of a significant quantity of the majority of the components used to calculate the nutritional score and due to the liquid nature of the products, it is necessary to count the category-specific components (sugar and calories) when calculating the nutritional score. Thus, modifications were made to improve the consistency of Nutri-Score and nutritional guideline classifications (Haut Conseil de la Santé Publique 2015).

Cheeses

Cheeses are included under the definition of dairy products, which should be consumed several times a day. The guidelines encourage consumers to take note of the amount of fat (to be avoided) and calcium (to be encouraged).

There is a strong correlation between the protein and calcium content of dairy products (Rayner et coll. 2005). Calcium is not one of the nutrients subject to mandatory declarations. That is why the score modification consists solely of ensuring that the amount of protein in cheeses is always counted (which would otherwise be precluded by their salt, calorie and saturated fatty acid content, as these result in a total N value that exceeds 11). This ensures that their relative calcium content is accounted for.

Thus, the protein content is counted, whether the N point total is <11 or not, and the thresholds for the other food categories remain the same. Cheeses are divided into three Nutri-Score classes.

Cheese nutritional score = Total N points – Total P points

Added fats

The French national nutrition health programme (PNNS) recommends privileging plant-derived fats and limiting animal fats (butter and cream). The classification obtained with the original FSA score calculation that put all added fats in the 'dark orange/E' category does not seem consistent with nutritional guidelines. Thus, the FSA score algorithm must be optimised to better account for saturated fatty acid contents³. The points table for fatty acids is calculated based on the total saturated fatty acid/lipid component (as a percentage) with the table for assigning points starting at 10% and increasing by steps of 6%.

The total saturated fatty acids/lipids calculation replaces the saturated fatty acids column, but the other columns must be used.

Points	Ratio total saturated fatty acids/lipids (%)
0	<10
1	<16
2	<22
3	<28
4	<34
5	<40
6	<46
7	<52
8	<58
9	<64
10	≥64

Beverages:

For beverages, the nutritional composition specific to this category must be accounted for, especially the sugar content. Modifications have been made in order to improve consistency between the Nutri-Score classification and nutritional guidelines (Haut Conseil de la Santé Publique 2015). Water is the only beverage recommended by international bodies. That is why water is always kept distinct from all other beverages (including those with 0 calories). Furthermore, the latest scientific research suggests that drinking sweetened (calorie-free) beverages has a negative impact on health (Fowler et coll. 2008; Narain et coll. 2017) or at least that there is no benefit from consuming these products (ANSES 2015b).

Scores for drinks are calculated using the following tables:

The calculation of the energy, total sugars and fruit and vegetables columns replaces the previous columns, but the other columns must be used.

Points	Energy (kJ)	Total sugars (g)	Fruits and vegetables (%)
0	≤0	≤0	≤40
1	≤30	≤1.5	
2	≤60	≤3	>40
3	≤90	≤4.5	
4	≤120	≤6	>60
5	≤150	≤7.5	

³ EU framework for national initiatives on selected nutrients saturated fatty acids (2011)

6	≤180	≤9	
7	≤210	≤10.5	
8	≤240	≤12	
9	≤270	≤13.5	
10	>270	> 13.5	>80

Assigning Colours

Attribution des couleurs

Aliments solides (points)	Boissons (points)	
Min à -1	Eau	
0 à 2	≤ 1	
3 à 10	2 à 5	
11 à 18	6 à 9	
≥ 19	≥ 10	