

Information on Nutrition and Health Claims

April 2021



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April 2021

Published by:

Food Safety Authority of Ireland

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ISBN 1-904465-69-2

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Omega 3 With no added sugars **Fat-free** Cholesterol
free Low fat **Fat-free** Low saturated fat **Source of**
High monounsaturated fat High polyunsaturated
Low sugars Sugars-free **With no added sugars**
n-free/salt-free **Source of fibre** High fibre **Source**
of minerals Contains nutrients Increased nutrients



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Background

This document is guidance information on the regulation of nutrition and health claims in Ireland*.

The document provides an overview of the:

- Nutrition and health claims legislation
- Nutrition labelling requirements for food products bearing authorised nutrition and health claims

Legislation Referred to in this Document

Throughout the document where guidance is given on aspects of the legislation, a reference to the relevant articles and legislation is included. This is to facilitate a more detailed examination. For precise and accurate interpretation, refer to the legislation below.

Nutrition and Health Claims

- 1) Regulation (EC) 1924/2006 of the European Parliament and of the council of 20 December 2006 on nutrition and health claims made on food (as amended)
- 2) Commission implementing decision of 24 January 2013 adopting guidelines for the implementation of specific conditions for health claims laid down in Article 10 of Regulation (EC) No 1924/2006 of the European Parliament and of the Council
- 3) European Court of Justice Ruling C-19/15 regarding the scope of Commission Regulation 1924/2006 Article 1(2)
- 4) Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers (commonly known as FIC)

Food Supplements

- 4) Directive 2002/46/EC of the European Parliament and of the Council of 10 June 2002 on the approximation of the laws of the Member States relating to food supplements
- 5) S.I. No. 506 of 2007 European Communities (Food Supplement) Regulations, 2007

Nutrition and Health Claims Overview

Regulation 1924/2006 on nutrition and health claims on food came into effect on 1st July 2007. It covers all foods including foods for particular nutritional uses (PARNUTS), natural mineral waters, water intended for human consumption and food supplements. As of July 20th 2016 PARNUTS was repealed by Regulation (EU) No 609/2013 on food intended for infants and young children, foods for special medical purposes and total diet replacement for weight control.

The Regulation applies to nutrition and health claims made in commercial communications (whether in the labelling, presentation or advertising) of the food to be delivered to the final consumer, including health professionals.

It includes foods:

- Placed on the market unpacked or supplied in bulk
- Intended for supply to restaurants, hospitals, schools, canteens and similar mass caterers

The Regulation **does not** apply to claims made in non-commercial communications such as:

- Dietary guidelines
- Advice issued by public health authorities and bodies
- Information in the press and in scientific publications

* Given that food legislation continues to be adapted and amended, updates on nutrition and health claims will be provided through the FSAI website www.fsai.ie

Claims should not:

- ✗ Be false or misleading
- ✗ Give rise to doubt about the safety and/or nutrition adequacy of other foods
- ✗ Encourage or condone excess consumption of a food
- ✗ State, suggest or imply that a properly balanced and varied diet cannot provide adequate quantities of nutrients
- ✗ In general, refer to changes in bodily function that could give rise to, or exploit fear in the consumer either textually or through pictorial, graphic or symbolic representation

(Article 3 of Regulation 1924/2006)

- ✗ Attribute to any foodstuff the property of preventing, treating or curing a human disease, or referring to such properties

(Article 7 (3) of Regulation 1169/2011)

In order to make a claim, the following conditions must be fulfilled:

- ✓ The substances for which a claim is made, must be shown to have beneficial nutritional or physiological effects established by **generally accepted scientific principles**
- ✓ The beneficial nutrient or substance for which the claim is made, is present in the final product in a **significant quantity**
 - the nutrient or substance for which the claim is made is in a form that is '**available for use by the body**' (bioavailable)
 - the claimed beneficial effect has to be provided by a '**reasonable quantity of the consumed product**'. This means that an adequate amount of the active nutrient or substance has to be present in a reasonable amount of the food product
 - if the claimed beneficial effect is due to the absence or reduction of a nutrient or substance, then the nutrient or substance should be absent or reduced to the extent that produces the nutritional or physiological effect claimed
- ✓ The **average consumer should understand** the beneficial effects expressed in the claim
- ✓ The claim refers to the **food ready for consumption** according to the manufacturer's instructions
- ✓ The claim complies with the specific conditions for nutrition claims and health claims (as outlined in this document)

(Article 5 of Regulation 1924/2006)

Nutrient Profiles

Food products bearing claims should not be inherently "unhealthy". This means that foods bearing claims should not have high levels of nutrients that need to be restricted to prevent chronic diseases, e.g. fat, saturated fatty acids, *trans* fatty acids, sugars and salt. Rules setting "nutrient profiles" will establish healthy limits for different categories of foods.

(Article 4 of Regulation 1924/2006)

In 2008, the European Food Safety Authority published an opinion on nutrient profiles (<http://www.efsa.europa.eu/en/efsajournal/pub/644.htm>). However, nutrient profiles have yet to be established by the Commission and Member States.

Nutrition Claims

Regulation 1924/2006 defines a **nutrition claim** as:

'any claim which states, suggests or implies that a food has particular beneficial nutritional properties due to:

- (a) the energy (calorific value) it
 - (i) provides;
 - (ii) provides at a reduced or increased rate; or
 - (iii) does not provide; and/or
- (b) the nutrients or other substances it
 - (i) contains;
 - (ii) contains in reduced or increased proportions; or
 - (iii) does not contain.'

Nutrition claims are the simplest type of claim about the nutrients a food contains, e.g. orange juice contains vitamin C.



Regulation No 1169/2011 defines nutrient as:

- Protein
- Carbohydrate
- Fat
- Fibre
- Sodium
- Vitamins and minerals listed in point 1 of Part A of Annex XIII to this Regulation (see page 8) and substances which belong to or are components of one of those categories

How to find out if you can make a nutrition claim on your food product

This step-by-step guide will show you how to find out if you can make a nutrition claim on your food.

Step 1. Describe your food product

You need to find out exactly:

1. What nutrients are in your food product?
2. How much of each nutrient is present in 100g or 100ml of your food, as eaten?
3. Is your food product high in total fat, saturated fat, *trans* fat, sugars and salt, so that when nutrient profiles are introduced, claims will not be permitted?

Note:

Levels for nutrient profiles have yet to be established by the Commission and Member States. In the meantime, it is inadvisable to put claims on food products high in these nutrients, particularly saturated fat, sugar and salt. <http://www.efsa.europa.eu/en/efsjournal/pub/644.htm>

First – describe your food in detail. This is important because the nutritional content of foods varies even between foods that are very similar, e.g. white bread vs. wholegrain bread or dairy spread vs. polyunsaturated spread.

Second – if your food product is made up of different ingredients, e.g. sandwiches, lasagne, the nutritional content will vary according to different recipe combinations. You need to find out what nutrients are present in the amount of each ingredient that makes up 100g or 100ml of your product (see egg sandwich example on page 33).

Note:

Nutrition and health claims should refer to the food ready for consumption, as according to the manufacturer's instructions.

Step 2. Find out the nutritional content of your food product

Information on the nutritional content of foods is can be found by accessing:

- Food composition tables (make sure the data are suitable for use in Ireland)
- Nutritional information from ingredient suppliers

Using food composition tables

Food composition tables always give the nutrient information per 100g/100ml.

In Ireland, McCance and Widdowson's composition of foods integrated dataset (CoFIDs) is the accepted data source for food composition. There is a free version of this available online: (<https://www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid>).

The information presented in food composition tables is quite complex. We encourage users to evaluate the accuracy, relevance and completeness of their results themselves and where necessary, seek appropriate expert advice.

Note:

There is a user-friendly food composition database available online that you can use to find out roughly what nutrients your food product contains. The U.S. Department of Agriculture (USDA) database is available at: <http://ndb.nal.usda.gov/>. Unfortunately, this will not give you information that is accurate enough for your Irish food product because it is an American food database¹. Nonetheless, information from the USDA database will give you some indication to help you decide if your food product has the potential to bear nutrition and health claims.

Important:

To ensure your product can really make a claim, the information you access from the USDA database must be validated by checking CoFIDs. This may require help from a dietitian/nutritionist with a recognised qualification. Nutrition and health claims for Irish foods or products made from Irish/European ingredients cannot be based on USDA food composition data.

Step 3. Identify what nutrition claims you can make on your food product

A full list of the nutrition claims permitted in Europe is outlined in the Annex of Regulation 1924/2006. There are specific conditions your food product has to meet in order to legally bear these permitted claims – these are referred to as 'conditions of use'. A summary of these nutrition claims and their conditions of use are displayed in this booklet on pages 6 and 7.

Nutrition claims on vitamins and minerals

In relation to claims on vitamins and minerals ('source of' or 'high in'), the required levels to make these claims are outlined on page 9.

Nutrition claims on protein, monounsaturated, polyunsaturated and unsaturated fat.

These nutrition claims require the use of a conversion factor. This is outlined in detail on page 8.

Practical examples on how to follow the step by step process to make permitted nutrition and health claims on food products are outlined in Annex 1 (pages 29 – 35)

¹ American foods can differ from European foods due to geographic location, animal husbandry, climate and mandatory and voluntary food fortification policies.

Listed below are the permitted nutrition claims with their conditions of use as detailed in the Annex of Regulation 1924/2006 (as amended). This list is on the Community Register of claims on the European Commission website. <http://ec.europa.eu/nuhclaims/>

Nutrition Claim	Condition of Use
Low energy	Product does not contain more than – 40 kcal (170 kJ)/100g for solids or 20 kcal (80 kJ)/100ml for liquids <i>Table-top sweeteners (which have equivalent sweetening properties to 6g of sucrose (approximately 1 teaspoon of sucrose providing 24kcal (100kJ) can bear this claim if they contain no more than 4kcal (17kJ)/portion, which have equivalent sweetening properties to 6g of sucrose (approximately 1 teaspoon of sucrose providing 24kcal (100kJ))</i>
Energy-reduced	Energy value is reduced by at least 30% , with an indication of the characteristic(s) which make(s) the food reduced in its total energy value
Energy-free	Product does not contain more than 4kcal (17kJ)/100ml. <i>For table-top sweeteners the limit of 0.4kcal (1.7kJ)/portion, with equivalent sweetening properties to 6g of sucrose (approximately 1 teaspoon of sucrose), applies</i>
Low fat	Product contains no more than – 3g of fat per 100g for solids or 1.5g of fat per 100ml for liquids (1.8g of fat per 100ml for semi-skimmed milk)
Fat-free	Product contains no more than 0.5g of fat per 100g or 100ml Claims expressed as 'X% fat-free' are prohibited.
Low saturated fat	The sum of saturated fatty acids and <i>trans</i> -fatty acids in the product does not exceed 1.5g per 100g for solids or 0.75g per 100ml for liquids and in either case, the sum of saturated fatty acids and <i>trans</i> -fatty acids must not provide more than 10% of energy
Source of omega-3 fatty acids	The product contains: at least 0.3g alpha-linolenic acid per 100g and per 100kcal, or at least 40mg of the sum of eicosapentaenoic acid and docosahexaenoic acid per 100g and per 100kcal
High omega-3 fatty acids	The product contains: at least 0.6g alpha-linolenic acid per 100g and per 100kcal, or at least 80mg of the sum of eicosapentaenoic acid and docosahexaenoic acid per 100g and per 100kcal
High monounsaturated fat	At least 45% of the fatty acids present in the product derive from monounsaturated fat under the condition that monounsaturated fat provides more than 20% of energy of the product
High polyunsaturated fat	At least 45% of the fatty acids present in the product derive from polyunsaturated fat under the condition that polyunsaturated fat provides more than 20% of energy of the product
High unsaturated fat	At least 70% of the fatty acids present in the product derive from unsaturated fat under the condition that unsaturated fat provides more than 20% of energy of the product
Saturated fat-free	The sum of saturated fat and trans-fatty acids does not exceed 0.1g of saturated fat per 100g or 100ml
Low sugar	The product contains no more than – 5g of sugars per 100g for solids or 2.5g of sugars per 100ml for liquids
Sugar-free	Product contains no more than 0.5g of sugars per 100g or 100ml
With no added sugars	Product does not contain any added mono- or disaccharides or any other food used for its sweetening properties. If sugars are naturally present in the food , the following indication should also appear on the label: ' Contains naturally occurring sugars '
Low sodium/salt	Product contains no more than 0.12g of sodium , or 0.3g of salt , per 100g or per 100ml For waters other than natural mineral waters falling within the scope of Directive 80/777/EEC, this value should not exceed 2mg of sodium per 100ml
Very low sodium/salt	Product contains no more than 0.04g of sodium , or 0.1g of salt , per 100g or per 100ml This claim shall not be used for natural mineral waters and other waters .
Sodium-free/salt-free	Product contains no more than 0.005g of sodium , or 0.0125g of salt , per 100g

Nutrition Claim	Condition of Use
No added sodium/salt	A claim stating that sodium/salt has not been added to a food and any claim likely to have the same meaning for the consumer may only be made where the product does not contain any added sodium/salt or any other ingredient containing added sodium/salt and the product contains no more than 0.12g sodium, or the equivalent value for salt , per 100g or 100ml
Source of fibre	Product contains at least 3g of fibre per 100g or at least 1.5g of fibre per 100kcal
High fibre	Product contains at least 6g of fibre per 100g or at least 3g of fibre per 100kcal
Source of protein	At least 12% of the energy value of the food is provided by protein
High protein	At least 20% of the energy value of the food is provided by protein
Source of [name of vitamin/s] and/or [name of mineral(s)]	The product contains at least a significant amount as defined in Annex XIII to Regulation EU No 1169/2011 (values are given on page 9) or An amount provided for by derogations granted according to Article 6 of Regulation (EC) No. 1925/2006 of the European Parliament and of the Council of 20 December 2006 on the addition of vitamins and minerals and of certain other substances to foods (note: the derogations referred to here have not been agreed yet)
High [name of vitamin/s] and/or [name of mineral(s)]	Where the product contains at least twice the value of 'source of' [name of vitamin/s] and/or [name of mineral/s] (values are given on page 9)
Contains [name of the nutrient or other substance]	A claim that a food 'contains' a nutrient or other substance (for which specific conditions are not laid down in Regulation 1924/2006), or any claim likely to have the same meaning as 'contains' for a consumer, may only be made where the product complies with Regulation 1924/2006, particularly Article 5. For vitamins and minerals, the conditions of the claim 'source of' apply
Increased [name of nutrient]	Product meets the conditions for the claim 'source of' and the increase in content is at least 30% compared to a similar product [name of nutrient, other than vitamins and minerals]
Light/Lite	Conditions as those set for the term ' reduced '; the claim shall also be accompanied by an indication of the characteristic(s) which make(s) the food 'light' or 'lite'
Naturally/Natural	Where a food naturally meets the condition(s) laid down in this Annex for the use of a nutritional claim, the term ' naturally/natural ' may be used as a prefix to the claim
Reduced [name of nutrient]	Where the reduction in content is at least 30% compared to a similar product , except for micronutrients (vitamins and minerals), where a 10% difference in the reference values as set in Regulation EU No 1169/2011 shall be acceptable, and for sodium, or the equivalent value for salt, where a 25% difference shall be acceptable The claim "reduced saturated fat", and any claim likely to have the same meaning for the consumer, may only be made: Where the sum of saturated fatty acids and of <i>trans</i> -fatty acids in the product is at least 30% less than in a similar product; and where the content in <i>trans</i> -fatty acids is equal to or less than in a similar product The claim "reduced sugars", and any claim likely to have the same meaning for the consumer, may only be made where the amount of energy in the product is equal to, or less than the amount of energy in a similar product

Comparative Claims

A comparison may only be made between foods of the same category, taking into consideration a range of foods from that category. The difference in the quantity of a nutrient and/or the energy value must be stated and the comparison must relate to the same quantity of food.

(Article 9 of Regulation 1924/2006)

When making a comparative claim about the presence of a vitamin or mineral, the product must contain a significant amount of that nutrient (see table on page 9 for significant amounts).

Example: If a yogurt product in a 125g pot makes a comparative claim such as 'increased fibre', then the conditions of use for the claims 'increased' must be met. The fibre content of the yogurt must be at least 30% higher compared to a similar 125g pot of yogurt.

Nutrition Claims and Energy Conversion Factors

“source of protein”
 “high protein”
 “high monounsaturated fat”
 “high polyunsaturated fat”
 “high unsaturated fat”

To make these claims, a food must provide a minimum amount of energy from the specific nutrient (see pages 6 and 7 for the minimum amounts required to make these claims).

To verify the amount of energy provided by either protein or fat, the following conversion factors from Regulation No 1169/2011, as amended, are used.

Nutrient	Conversion Factor	Amount of Energy per 1g of Nutrient
Protein	4kcal/g 17kJ/g	1g protein x 4kcal = 4kcal per g protein
Fat (saturated, unsaturated, polyunsaturated and monounsaturated)	9kcal/g 37kJ/g	1g fat x 9kcal = 9kcal per g fat

Therefore

$$\% \text{ energy from the nutrient} = \frac{\text{Grams of nutrient per 100g of product} \times \text{Conversion factor for nutrient}}{\text{Total Energy per 100g of product}} \times 100$$

The nutrition table below is for a product making a ‘source of protein’ claim. A ‘source of protein’ claim requires that **at least 12% of the energy** in the food is provided by protein.

Nutrition Information	Per 100g
Energy	1136kJ 268kcal
Fat of which saturates	2.3g 0.67g
Carbohydrate of which sugars	48.8g 41g
Protein	13g
Salt	0.425g

The calculation below uses the protein conversion factor of 4kcal/g to determine the amount of the energy from protein in the product.

$$\% \text{ energy from protein} = \frac{\text{Grams of protein per 100g of product} \times \text{Conversion factor for protein}}{\text{Total Energy per 100g}} \times 100$$

$\frac{13 \times 4}{268} \times \frac{100}{1} = 19.4\%$ is the amount of energy from protein. Therefore the claim ‘**source of protein**’ can be used for this product.

Vitamins and Minerals

Daily Reference Intake (RI) values for vitamins and minerals are listed in the table below (Annex XIII of 1169/2011). These RI values previously known as Recommended Daily Allowances (RDAs), have not changed. RI values should be used on food labels. The minimum values of vitamins and minerals required to meet the conditions for '**source of**' and '**high**' claims in solids, liquids and beverages are listed below.

Table 1. Amount of vitamins and minerals required in solids, liquids and beverages for 'source of' and 'high in' claims.

Micronutrient	Refence intake	Solids (per 100g) Liquids* (other then beverages) per 100ml, single serve packs		Beverages (per 100ml)	
		Claims that are source of	Claims that are high in	Claims that are source of	Claims that are high in
Vitamin A (µg)	800	120.00	240.00	60.00	120.00
Vitamin D (µg)	5	0.75	1.50	0.38	0.75
Vitamin E (mg)	12	1.80	3.60	0.90	1.80
Vitamin K (µg)	75	11.25	22.50	5.63	11.25
Vitamin C (mg)	80	12.00	24.00	6.00	12.00
Thiamine (B1) (mg)	1.1	0.17	0.33	0.08	0.17
Riboflavin (B2) (mg)	1.4	0.21	0.42	0.11	0.21
Niacin (B3) (mg)	16	2.40	4.80	1.20	2.40
Vitamin B6 (mg)	1.4	0.21	0.42	0.11	0.21
Folic Acid (µg)	200	30.00	60.00	15.00	30.00
Vitamin B12 (µg)	2.5	0.38	0.75	0.19	0.38
Biotin (B7) (µg)	50	7.50	15.00	3.75	7.50
Pantothenic Acid (B5) (mg)	6	0.90	1.80	0.45	0.90
Potassium (mg)	2000	300.00	600.00	150.00	300.00
Chloride (mg)	800	120.00	240.00	60.00	120.00
Calcium (mg)	800	120.00	240.00	60.00	120.00
Phosphorus (mg)	700	105.00	210.00	52.50	105.00
Magnesium (mg)	375	56.25	112.50	28.13	56.25
Iron (mg)	14	2.10	4.20	1.05	2.10
Zinc (mg)	10	1.50	3.00	0.75	1.50
Copper (mg)	1	0.15	0.30	0.08	0.15
Manganese (mg)	2	0.30	0.60	0.15	0.30
Flouride (mg)	3.5	0.53	1.05	0.26	0.53
Selenium (µg)	55	8.25	16.50	4.13	8.25
Chromium (µg)	40	6.00	12.00	3.00	6.00
Molybdenum (µg)	50	7.50	15.00	3.75	7.50
Iodine (µg)	150	22.50	45.00	11.25	22.50

* Liquids other than beverages, e.g. oils

Note:

For solid and liquid products* to claim 'source of', there must be at least 15% of the RI in 100g/100ml*

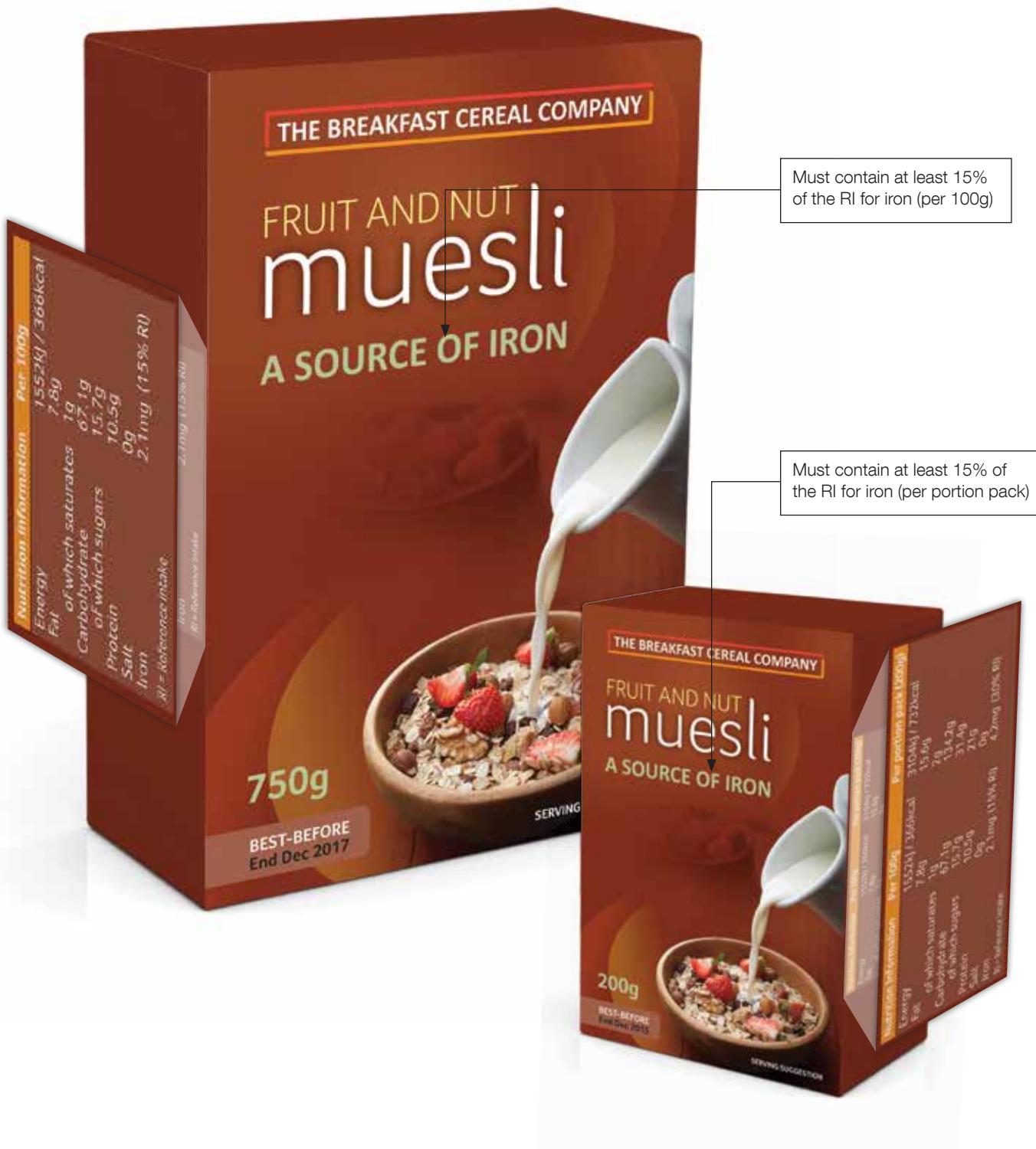
For beverages to claim 'source of', there must be at least 7.5% of the RI per 100ml*

For all products (solids, liquids & beverages) in single-serve portion packs, to claim 'source of' there must be at least 15% of the RI in the pack

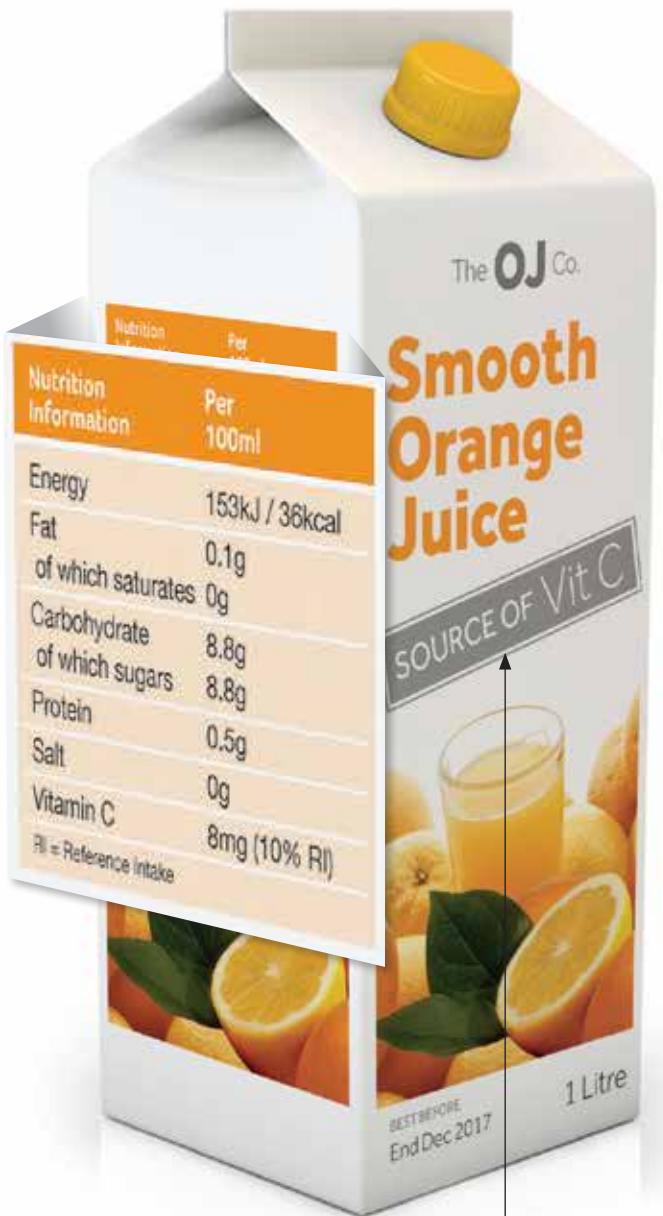
* These rules relate to full-sized product packs from which multiple servings can be taken.

Making ‘source-of’ Claims on Food Products

1. Solid food in full-sized pack and single-serve portion pack



2. Beverages in full-sized pack and single-serve portion pack



Must contain at least 7.5% of the RI for Vitamin C (per 100ml)

Nutrition Information	Per 100ml	Per portion pack (150ml)
Energy	153kJ / 36kcal	230kJ / 54kcal
Fat	0.1g	0.15g
of which saturates	Tr	Tr
Carbohydrate	8.8g	13.2g
of which sugars	8.8g	13.2g
Protein	0.5g	0.75g
Salt	0g	0g
Vitamin C	8mg (10% RI)	12mg (15% RI)

RI = Reference Intake



3. Liquids in full-sized pack and single-serve portion pack

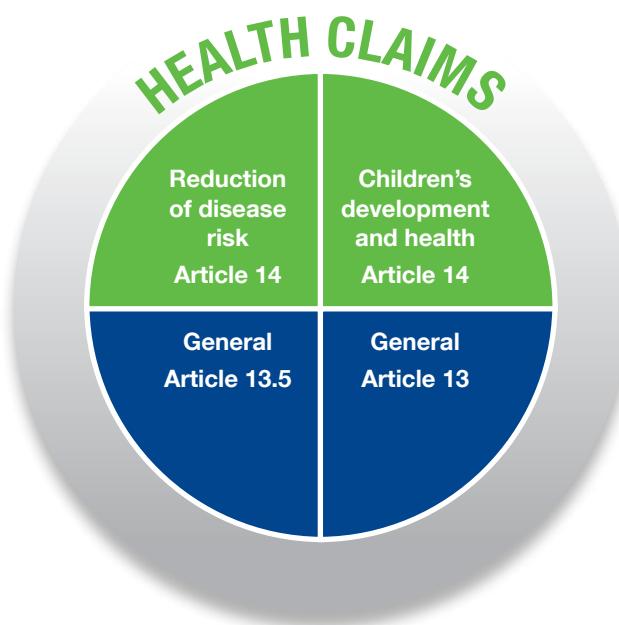


Health Claims

Regulation 1924/2006 on nutrition and health claims defines a **health claim** as:

'any claim that states, suggests or implies that a relationship exists between a food category, a food or one of its constituents and health.' e.g. this drink will help you feel more energetic/this food will help you concentrate etc.

There are four types of health claims.



Claim	Type of Claim
Article 14 health claims	Reduction of disease risk claims and
	Claims referring to children's development and health.
Article 13(5) health claims	Health claims other than disease risk reduction and children's development and health. These claims are based on newly developed scientific evidence and may include a request for the protection of proprietary data.
Article 13 health claims	Health claims other than disease risk reduction and children's development and health. Also known as 'General health claims', these claims relate to the effect of a substance on a body function.

Article 14 claims

'Reduction of disease risk claim' is defined as:

'any health claim that states, suggests or implies that the consumption of a food category, a food or one of its constituents significantly reduces a risk factor in the development of a human disease.'

(Regulation 1924/2006)

'Children's development and health claims' are defined as:

'health claims solely referring to the development and health of children and where the science is only valid for children, e.g. calcium is good for children's growth'.

and/or

'health claims used on products intended exclusively for children, like follow on formulae, processed cereal-based foods and baby foods.'

'Children' means persons between the ages of 0 and 18 years.

Note that claims relating to health benefits to a foetus are also classed as 'Children's development and health claims'.

(EU guidance on the implementation of Regulation No 1924/2006 on nutrition and health claims made on foods conclusions of the standing committee on the food chain and animal health 14th December 2007)

The following health claims are not permitted:

- ✗ Claims that suggest that health could be affected by not consuming the food
- ✗ Claims which make reference to the rate or amount of weight loss
- ✗ Claims that make reference to recommendations of individual doctors or health professionals and other associations, not provided for in community or national rules

Health claims must include:

- ✓ A statement indicating the importance of a varied and balanced diet and a healthy lifestyle
- ✓ The quantity of the food and pattern of consumption required to obtain the claimed beneficial effect
- ✓ Where appropriate, a statement addressed to persons who should avoid using the food
- ✓ An appropriate warning for products that are likely to present a health risk if consumed to excess
- ✓ Other statements that are mandatory according to the conditions of the specific claim

The above information must be included in the labelling, or if no such labelling exists, in the presentation and advertising.

(Article 10 of Regulation 1924/2006)

How to find out if you can make a health claim on your food product

Step 1. Describe your food product

Follow the procedures for nutrition claims outlined on pages 6 and 7

Step 2. Find out the nutritional content of your food product.

Follow the procedures for nutrition claims outlined on pages 6 and 7

Step 3. Identify what nutrition claims you can make on your food product

Follow the procedures for nutrition claims outlined on pages 6 and 7

Step 4. Identify what health claims you can make on your food product

Now that you have identified the nutrition claims that are possible for your product, you can investigate what authorised health claims are permitted based on these nutrients. All types of authorised health claims (13.1, 13.5, 14.1a, 14.1b) are all listed in the Community Register of Claims for the EU. You can find out what health claims are authorised for your product by searching this register for claims relating to the nutrients you have identified for your product.

Each authorised health claim has specific ‘conditions of use’ and these are listed in the Community Register of Claims. You need to check that your food product satisfies the conditions of use for each claim in order to use it legally.

Practical examples on how to follow the step by step process to make permitted nutrition and health claims on food products are outlined in Annex 1 (pages 29 – 35)



Further Information on the Community Register of Claims

The Community Register of Claims is on the European Commission website. The website address and snapshot are given below

<http://ec.europa.eu/nuhclaims/>

The screenshot shows the European Commission's Food Safety website for nutrition and health claims. On the left, there is a 'Select criteria' sidebar with dropdown menus for 'Claim status' (All), 'Type of claim' (All), 'EFSA Opinion reference' (All), 'Legislation' (All), and a search bar. Below these are checkboxes for 'Match entire phrase' and 'Reset filter'. The main content area features the European Commission logo and the word 'FOOD'. It includes navigation links for 'HEALTH', 'FOOD', 'ANIMALS', 'PLANTS', and 'AMR'. A banner at the top right says 'Follow us on Twitter'. The central part of the page is titled 'EU Register on nutrition and health claims' in red. It contains a note about the search tool only allowing searches for health claims, not nutrition claims. It also mentions that health claims for which protection of proprietary data is granted are only listed here. A download link for the complete dataset is provided. The main table displays one entry for 'ORSALIT' under 'Art.13(1)'. The columns include: Claim type (Art.13(1)), Nutrient, substance, food or food category (ORSALIT), Claim (1. ORSALIT is used in all cases when dehydration may occur 2. ORSALIT is hypotonic oral rehydrating solution composed according to WHO/UNICEF recommendations - ORSALIT. ORSALIT is available in following versions: - ORSALIT without flavor, - ORSALIT with banana), Conditions of use of the claim / Restrictions of use / Reasons for non-authorisation (1. ORSALIT is used in all cases when dehydration may occur 2. ORSALIT is hypotonic oral rehydrating solution composed according to WHO and UNICEF recommendations 3. ORSALIT helps to avoid), Health relationship (Treatment of diarrhoea and/or vomiting), EFSA opinion reference / Journal reference (2011/9(6):2228), Commission Regulation (None), and Status (Non-authorised). The table has a header row with column titles.

Claim type	Nutrient, substance, food or food category	Claim	Conditions of use of the claim / Restrictions of use / Reasons for non-authorisation	Health relationship	EFSA opinion reference / Journal reference	Commission Regulation	Status
Art.13(1)	"Dietary food for special medical purposes - oral rehydrating solution with decreased osmolarity composed according to WHO/UNICEF recommendations - ORSALIT. ORSALIT is available in following versions: - ORSALIT without flavor, - ORSALIT with banana	1. ORSALIT is used in all cases when dehydration may occur 2. ORSALIT is hypotonic oral rehydrating solution composed according to WHO/UNICEF recommendations 3. ORSALIT helps to avoid	Non-compliance with the Regulation because on the basis of the scientific evidence assessed, this claimed effect attributes to this food the property of preventing,	Treatment of diarrhoea and/or vomiting	2011/9(6):2228		Non-authorised

This register lists approved health claims and conditions for their use, as well as rejected health claims and the reasons for rejection. Authorised health claims must be filtered by the 'Claim Status' drop-down list shown in the photo above. It provides up-to-date information on the legal status of health claims. The process of evaluating health claims is ongoing in Europe and claims are added to the Register on an ongoing basis.

Health claims which are not on the authorised list **cannot** be used. There are some exceptions to this as some claims (mostly relating to botanical substances) are awaiting evaluation and are currently legal for use. Refer to the FSAI website for up to date information on the status of health claims.

Examples of Article 13 'general health' claims and their conditions of use

'Calcium is needed for the maintenance of normal teeth'

This claim on calcium can be made on any food/food supplement which is at least a 'source of' calcium. This means it must contain a 'significant amount' (see table on page 9 for significant amounts).

'Water contributes to the maintenance of normal regulation of the body's temperature'

This claim can be made only on water which complies with the Directive on the exploitation and marketing of natural mineral waters (2009/54/EC) and the Drinking Water Directive (98/83/EC). The product must clearly state that the effect is obtained when at least 2 litres of water (from all sources) is consumed per day.

'Oat grain fibre contributes to an increase in faecal bulk'

This claim can be made on foods containing oat grain fibre as long as the product meets the conditions for the nutrition claim 'High fibre' (i.e. the product must contain 6g fibre per 100g or at least 3g fibre per 100kcal)

Wording of health claims

When wording health claims, food businesses should keep as close as possible to the authorised wording listed in the Community register. However, some flexibility is possible to help consumer understanding.

1) The adapted wording must have the same meaning to the consumer as the authorised wording and must not make the claim 'stronger' than the authorised claim

Examples:

Authorised wording: 'ALA contributes to the maintenance of normal blood cholesterol levels'

Permitted adapted wording: 'Omega 3 contributes to the maintenance of normal blood cholesterol levels'

Authorised wording: 'Selenium *contributes* to the normal function of the immune system'

Permitted adapted wording: 'Selenium *supports* the normal function of the immune system'

Non-permitted adapted wording: 'Selenium *optimises* the normal function of the immune system'

2) Use of the term 'normal'

The term 'normal' appears in the authorised wording of many Article 13 health claims. It should be retained if the wording is being adapted, and should not be replaced by another term or removed.

Examples:

The claim 'Calcium contributes to normal muscle function' should not be reworded to 'Calcium contributes to muscle function', as this changes the meaning

3) Health claims should only be made for the nutrient, substance, food or food category for which they have been authorised and not for the product that contains them

Take as an example, the authorised health claim ‘Iron contributes to the normal function of the immune system’. In relation to a food called ‘Murphy’s Milk’ containing the relevant amount of iron, it would be acceptable to say:

‘Iron contributes to the normal function of the immune system’ or

‘Murphy’s milk contains iron which contributes to the normal function of the immune system’

but not:

‘Murphy’s milk contributes to the normal function of the immune system’ since this does not make a clear link between the nutrient (iron) and the claimed effect

4) General, non-specific health claims

When reference is made to general, non-specific benefits of a nutrient or food for overall good health, it must be accompanied by a specific, authorised Article 13 or 14 health claim.*

For example, if a general claim like ‘GOOD FOR YOUR SKIN’ was made on the front of a food called ‘Sheila’s seaweed’ (which is a source of iodine), it would be acceptable to present this as:

‘GOOD FOR YOUR SKIN’ – Iodine contributes to the maintenance of normal skin’ or

‘GOOD FOR YOUR SKIN’ – Sheila’s seaweed contains iodine which contributes to the maintenance of normal skin’

5) Reference to excerpts from EFSA opinions

The wording for each authorised health claim is provided in the EU register. EFSA opinions do not authorise wording for health claims. Use of phrases from an EFSA opinion on food products is not appropriate, as the phrase may not have the same meaning for the consumer as that of the authorised claim on the EU register.



* <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32013D0063&qid=1408631024104&from=EN>

Nutrition Labelling Requirements under Regulation EU No 1169/2011 (FIC)

Nutrition labelling requirements:

- Information is expressed per 100g or per 100ml. In addition, the information may be given per serving as quantified on the label or per portion, provided that the number of portions contained in the package is stated
- Information provided relates to the foodstuff as sold. The information may relate to the product after preparation, provided that sufficient preparation instructions are given and the label clearly states that the information relates to the food as prepared for consumption
- Information must be presented together in one place in tabular form with the numbers aligned. Where there is insufficient space on the label, the information may be presented in linear form
- Information must be legible, indelible, in a conspicuous location
- Information must be in English (other languages including Irish may be used in addition to English)

All pre-packaged foods must provide nutrition labelling from 13th December 2016*. Nutrition information on foods bearing nutrition and/or health claims and foods to which vitamins and/or minerals have been added, must comply with FIC since 13th December 2014.

However, if such foods have been placed on the market prior to 13th December 2014, with labelling compliant with earlier rules, they may be marketed until stocks are exhausted.

Note:

Before 13th December 2016, the only foods which are required to have nutrition labelling are those bearing nutrition and health claims and foods to which vitamins and/or minerals have been added. However, some food businesses may voluntarily provide nutrition labelling on foods. Even in these cases, since 13th December 2014, the nutrition labelling must follow the format in FIC, and all other aspects of the label must also follow rules in FIC.

* Requirements for nutrition labelling do not apply to food supplements, natural mineral waters and foods specified in Annex V of FIC. They do apply to foods for particular nutritional uses, without prejudice to Directive 2009/39/EC.

Mandatory Nutrition Labelling

It is mandatory for certain information to appear in the table of nutrition information and it must appear in a specific order. Energy must be listed first in the table. Fat should be displayed directly after energy, followed by other nutrients as shown in table 1 below.

The amount of salt must be declared. A statement can be included that salt is exclusively from natural sources if no salt has been added. Salt is calculated by multiplying the sodium content by 2.5.

Where the amount of a nutrient is negligible, the nutrition declaration for the nutrient can be replaced with a statement such as 'contains negligible amount of...' in close proximity to the nutrient declaration.

The European Commission has produced a guidance document on the tolerances allowed for nutrient values declared on the label and indications of negligible amounts. This is available here

http://ec.europa.eu/food/safety/docs/labelling_nutrition-vitamins_minerals-guidance_tolerances_1212_en.pdf

Table 1: Mandatory nutrition declaration

	Per 100g/ml
Energy	kJ/kcal
Fat of which saturates	g g
Carbohydrate of which sugars	g g
Protein	g
Salt	g

The information in the nutrition table can be supplemented by the following nutrients: monounsaturates; polyunsaturates; polyols; starch; fibre; vitamins and minerals. The order of presentation is shown below:

- (a) Monounsaturates
- (b) Polyunsaturates
- (c) Polyols
- (d) Starch
- (e) Fibre
- (f) Vitamins and minerals (see page 9 for a list of which vitamins and minerals can be listed)

If you choose to supplement the required nutrition information with information on the above nutrients, there is a specific order you must follow in the table, as shown in Table 2.

Table 2: Mandatory nutrition declaration with supplementary nutrients

	Per 100g/ml
Energy	kJ/kcal
Fat	g
of which saturates	g
of which monounsaturates	g
of which polyunsaturates	g
Carbohydrate	g
of which sugars	g
of which polyols	g
of which starch	g
Fibre	g
Protein	g
Salt	g
Vitamins and Minerals	Units specified on page 10 & % RI Values

Note:

Only the nutrients mandatorily required and the supplementary nutrients from the list above, i.e. (a) to (f) can be included in the nutrition table. **Other nutrients cannot be included in this table.**

If a claim is made on pack about a nutrient/substance that is not allowed to be listed in the nutrition table, e.g. Omega 3 fatty acids, then the amount of that nutrient/substance must be displayed in close proximity to the nutrition table (see example on page 26).

 Green = Mandatory  Purple = Voluntary/Optional

Reference Intakes (RI)

Where vitamins and minerals are declared in the nutrition table, the amount of each one must be declared per 100g or 100ml, **and** as a percentage of the reference intake (%RI). The reference intake values are outlined in Table 1 on page 9.

Along with the mandatory declaration listed above, the % Reference Intake (RI) values may also be provided on a voluntary basis for nutrients other than vitamins and minerals (i.e. energy, fat, saturates, carbohydrate, sugars, protein, salt). This optional declaration can be given per portion or per 100g or 100ml. The reference intakes for these nutrients are outlined in Table 3.

Table 3: Reference Intakes

Reference intakes	
Energy	8400kJ/2000kcal
Fat	70g
of which saturates	20g
Carbohydrate	260g
of which sugars	90g
Protein	50g
Salt	6g

See Table 4 for an example of a table with information on vitamins and minerals.

Table 4: Mandatory nutrition declaration with supplementary information on vitamins and minerals

	Per 100g/ml
Energy	kJ/kcal
Fat of which saturates	g g
Carbohydrate of which sugars	g g
Protein	g
Salt	g
Vitamin A	µg (%RI)
Vitamin C	mg (%RI)
Iron	mg (%RI)
Calcium	mg (%RI)

RI = Reference Intake

Per Portion/Consumption Unit

In addition to the mandatory nutrition declaration per 100g/ml, manufacturers may also declare the amount of nutrients per portion/consumption unit, provided that these are easily recognisable by the consumer. The label must also indicate the size of the portion/consumption unit and the number of portions/consumption units contained in the product.

It is the responsibility of the manufacturer to determine the size of the portion/consumption unit.

Examples of mandatory nutrition declaration with per portion/consumption unit information

Table 5a: Optimal per consumption unit information

	Per 100g/ml	Per Biscuit (10g)*
Energy	kJ/kcal	kJ/kcal
Fat of which saturates	g g	g g
Carbohydrate of which sugars	g g	g g
Protein	g	g
Salt	g	g

Green = Mandatory
 Purple = Voluntary/Optional

*This pack contains 10 biscuits

Table 5b

	Per 100g/ml	Per Portion (2 biscuits / 20g)*
Energy	kJ/kcal	kJ/kcal
Fat of which saturates	g g	g g
Carbohydrate of which sugars	g g	g g
Protein	g	g
Salt	g	g

Green = Mandatory
 Purple = Voluntary/Optional

*This pack contains 5 portions

Table 6: Mandatory nutrition declaration with supplementary information on vitamins and minerals

	Per 100g/ml
Energy	kJ/kcal
Fat of which saturates	g g
Carbohydrate of which sugars	g g
Protein	g
Salt	g
Vitamin A	µg (%RI)
Vitamin C	mg (%RI)
Iron	mg (%RI)
Calcium	mg (%RI)

See tables 7, 8 and 9 for examples of voluntary declarations.

Table 7: Mandatory nutrition declaration with voluntary % RI per 100g/ml

	Per 100g/ml	% RI Per 100g/ml
Energy	kJ/kcal	%
Fat of which saturates	g g	% %
Carbohydrate of which sugars	g g	% %
Protein	g	%
Salt	g	%

Green = Mandatory

Purple = Voluntary/Optional

Table 8: Mandatory nutrition declaration with voluntary portion information and % RI per 100g/ml

	Per 100g/ml	Per Biscuit (10g)*	% RI Per 100g/ml
Energy	kJ/kcal	kJ/kcal	%
Fat of which saturates	g g	g g	% %
Carbohydrate of which sugars	g g	g g	% %
Protein	g	g	%
Salt	g	g	%

*This pack contains 10 biscuits

Green = Mandatory

Purple = Voluntary/Optional

Table 9: Mandatory nutrition declaration with portion information and % RI values per 100g and per portion

	Per 100g/ml	Per Biscuit (10g)*	% RI Per 100g/ml**	% RI Per Biscuit
Energy	kJ/kcal	kJ/kcal	%	%
Fat	g	g	%	%
of which saturates	g	g	%	%
Carbohydrate	g	g	%	%
of which sugars	g	g	%	%
Protein	g	g	%	%
Salt	g	g	%	%

*This pack contains 10 biscuits

 Green = Mandatory  Purple = Voluntary/Optional

Font size

Regulation 1169/2011 has also introduced a minimum font size for all of the mandatory information and where nutrition information is declared on the label, it must also comply with this minimum font size. The mandatory information must appear on the label in characters using a font size where the x-height is equal to or greater than 1.2mm. This is covered in Annex IV of the Regulation.

Exemptions (Annex V of 1169/2011)

The following lists of foods are exempted from having to declare nutrition information:

- Unprocessed products that comprise a single ingredient or category of ingredients
- Processed products which the only processing they have been subjected to is maturing and that comprise a single ingredient or category of ingredients
- Waters intended for human consumption including those where the only added ingredients are carbon dioxide and/or flavourings
- A herb, a spice or mixtures thereof
- Salt and salt substitutes
- Table top sweeteners
- 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
- 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 so not modify the nutritional value of the tea.
- Fermented vinegars and substitutes for vinegar, including those where the only added ingredients are flavourings
- Flavourings
- Food additives
- Processing aids
- Food enzymes
- Gelatine
- Jam setting compounds
- Yeast
- Chewing gums
- Food in packaging or containers the largest surface of which has an area of less than 25cm²
- 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

Front of Pack (FoP) Nutrition Labelling (Voluntary)

Once the table of mandatory nutrition information is given, values for energy **or** for energy, fat, saturates, sugar and salt can be repeated on the front of pack. This is voluntary.

If you choose to provide this repeat information, it must be in one of the following two formats:

1. Energy value alone

Energy must be given as kJ and kcal

or

2. Energy +4 (fat, saturates, sugars and salt)

Energy (kJ and kcal) plus amounts of fat, saturates, sugars and salt (in grams).

Expression of front of pack (FoP) information per 100g or per 100ml and/or per portion/consumption unit

Depending on which of the above two formats are used, the following specific rules apply to how the nutrition information can be displayed:

1. Energy value alone

You may display the energy value (kJ and kcal) per portion. However, you must also display the energy value per 100g/100ml.

or



2. Energy +4 (fat, saturates, sugars and salt)

The energy, fat, saturates, sugars and salt (in grams) may be given:

per 100g or 100mls

or

per portion

However, if you give the values per portion, you must also display energy per 100g/100ml. Values for energy, fat, saturates, sugars, and salt may also be expressed as a percentage of the reference intake (RI) values per 100g, 100ml or portion.

Where the % RI information is provided on a per portion basis only, the following statement will also be required (if it is not already elsewhere on the label) – **Reference intake of an average adult (8400kJ/2000kcal).**



Sample Labels

Below is an example of a brown bread product bearing a permitted nutrition claim on Omega-3



Note:

Where a health claim is made in generic advertising (not linked to a food product).

There are special labelling rules for foods with added phytosterols/phytostanols and phytosterol/phytostanol esters (see FIC Annex III 5.1 for information).

Below is an example of a cooked beef product bearing a permitted general health claim



Below is an example of a food supplement bearing a permitted children's development and health claim



Note:

Specific food supplement labelling rules in Directive 2002/46 must be followed.

Annex 1. How I Can Make Permitted Nutrition and Health Claims on My Food Product – Practical Examples

1. Boiled Crab

Step 1 – Describe your food product

My food product is boiled crab meat.



Step 2 – Find out the nutritional content of your food product.

Accessing the free USDA database online at <http://ndb.nal.usda.gov/> the closest match to my food product is – ‘Crab, crustations, cooked in moist heat, meat only’

This shows me that my food product can potentially make claims in relation to providing Protein, Riboflavin, Pantothenic Acid, Chloride, Phosphorus, Magnesium, Zinc, Copper and Selenium.

This product was not high in total fat, saturated fat, *trans* fat, sugar or salt so there are no concerns about nutrient profiles.

Therefore, it is worth proceeding to find out the exact nutritional composition of my food product using food composition tables suitable for Ireland (CoFIDs) available at <https://www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid>.

Using CoFIDs nutrient composition data for my food product, I compare the levels per 100g with the required levels to make a nutrition claim.

CoFIDs composition tables show boiled crab meat (Food Code: 16-331) to contain the following nutrients in significant amounts.

Boiled Crab Meat (16-331)	
Nutrient	Amount per 100g
Protein	19.5g
Riboflavin	0.9mg
Pantothenic Acid	1.0mg
Chloride	640mg
Phosphorus	340mg
Magnesium	58mg
Zinc	5.5mg
Copper	1.8mg
Selenium	84µg

The product provides 535kJ/128kcal of energy per 100g.

Step 3 – Identify what nutrition claims you can make on your food product

I find from the list of nutrition claims (pages 6 and 7) I can make the following claims:

'Source of' several vitamins and minerals (after considering levels on page 9)

'High protein' (this required energy conversion calculations outlined on page 8)

All of these claims are shown below:

Macronutrient	Amount per 100g	Nutrition claim
Protein	19.5g (61% of energy from protein*)	High protein as protein supplies at least 20% of the energy value

* % energy from protein: $\frac{19.5 \times 4}{128} \times \frac{100}{1} = 61\%$

Micronutrient	Amount per 100g	'Source of'	'High in'
Riboflavin	0.9mg	✓	✓
Niacin	16mg	✓	✓
Pantothenic Acid	1.0mg	✓	✗
Chloride	640mg	✓	✓
Phosphorus	340mg	✓	✓
Magnesium	58mg	✓	✗
Zinc	5.5mg	✓	✓
Copper	1.8mg	✓	✓
Selenium	84µg	✓	✓

Step 4 – Identify what health claims you can make on your food product

I have identified that I can make nine nutrition claims on my food product.

I can now look up the Community Register of Claims to find out what authorised health claims are permitted based on these nutrients.

For this example I will outline some of the health claims that may be possible for my product because of its zinc content (please note there are several other claims that may be possible for this product based on the other eight nutrients it contains in significant amounts).

Product	Nutrient	Authorised health claims		
Boiled Crab Food Code: 16-331	Zinc	Zinc contributes to normal cognitive function	Zinc contributes to the maintenance of normal bones	Zinc contributes to the maintenance of normal vision

2. Natural yogurt made from semi-skim milk

Step 1 – Describe your food product

My food product is natural yogurt made from semi-skim milk.



Step 2 – Find out the nutritional content of your food product

Accessing the free USDA database online at <http://ndb.nal.usda.gov/> the closest match to my food product is '**Yogurt, plain, low fat**'.

This shows me that my food product can potentially make claims in relation to providing protein, reduced fat, calcium, phosphorus, riboflavin and vitamin B₁₂.

This product was not high in total fat, saturated fat, *trans* fat, sugar or salt so there are no concerns about nutrient profiles.

Therefore, it is worth proceeding to find out the exact nutritional composition of my food product using food composition tables suitable for Ireland (CoFIDs) available at <https://www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid>.

Using CoFIDs nutrient composition data for my food product, I compare the levels per 100g with the required levels to make a nutrition claim.

CoFIDs show low-fat yogurt to contain the following nutrients in significant amounts:

Yogurt, low-fat, plain (12-379)	
Nutrient	Amount per 100g
Protein	4.8g
Fat	1.0g
Riboflavin	0.2mg
Chloride	235mg
Calcium	162mg
Phosphorus	143mg
Iodine	34µg

The product provides 239kJ/56kcal of energy per 100g.

Step 3 – Identify what nutrition claims you can make on your food product

I find from the list of nutrition claims (pages 6 and 7) I can make the following claims:

A ‘low-fat’ claim

‘Source of’ several vitamins and minerals (after considering levels on page 9)

‘High protein’ (this required energy conversion calculations outlined on page 8)

All of these claims are shown below:

Macronutrient	Amount per 100g	Nutrition claim
Protein	4.8g (34% of energy from protein*)	High in protein as protein supplies at least 20% of the energy value
Fat	1.0g	Low-fat as product contains less than 3g fat per 100g

* % energy from protein:
$$\frac{4.8 \times 4}{56} \times \frac{100}{1} = 34\%$$

Micronutrient	Amount per 100g	‘Source of’	‘High in’
Riboflavin	0.2mg	✓	✗
Chloride	235mg	✓	✗
Calcium	162mg	✓	✗
Phosphorus	143mg	✓	✗
Iodine	34µg	✓	✗

Step 4 – Identify what health claims you can make on your food product

I have identified that I can make seven nutrition claims on my food product.

I can now look up the Community Register of Claims to find out what authorised health claims are permitted, based on these nutrients.

For this example, I will outline some of the health claims that may be possible for my product because of its calcium content (please note there are several other claims that may be possible for this product based on the other six nutrients it contains in significant amounts).

Product	Nutrient	Authorised health claims		
Low-fat, plain yogurt (12-379)	Calcium	Calcium is needed for the maintenance of normal bones	Calcium contributes to normal muscle function	Calcium contributes to normal energy-yielding metabolism



3. Egg Sandwich

Step 1 – Describe your food product

My food product is made up from two slices of wholemeal bread (64g), low saturated fat spread (14g) and one egg (58g).

Step 2 – Find out the nutritional content of your food product

Accessing the free USDA database online at <http://ndb.nal.usda.gov/> the closest matches to my ingredients were; bread, wheat bran, margarine spread, egg, whole, raw, fresh.

This shows me that my food product can potentially make claims in relation to providing Protein, Fibre, Vitamin E, Folic Acid, Biotin, Chloride and Phosphorus.

This product was not high in total fat, saturated fat, *trans* fat, sugar or salt so there are no concerns about nutrient profiles.

Therefore, it is worth proceeding to find out the exact nutritional composition of my food product using food composition tables suitable for Ireland (CoFIDs) available at <https://www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid>.

Using CoFIDs nutrient composition data for my food product, I compare the levels per 100g with the required levels to make a nutrition claim.

CoFIDs composition tables show the above components of the egg sandwich to contain the following nutrients in significant amounts:

Egg Sandwich (11-476, 12-806, 17-551)					
Nutrient	Amount of nutrient in 2 slices of wholemeal Bread (72g)	Amount of nutrient in 1 egg (58g)	Amount of nutrient in 14g of low saturated fat spread	Amount of nutrient in sandwich (144g)	Amount of nutrient in sandwich per 100g
Protein	6.8g	7.3g	0.1g	14.2g	9.9g
Fibre	5.0g	0g	0g	5.0g	3.5g
Vitamin E	0.2mg	0.6mg	5.3mg	6.1mg	4.2mg
Folic Acid	28.8µg	22.6µg	0µg	51.4µg	35.7µg
Biotin	4.5µg	9.3µg	0µg	13.8µg	9.6µg
Chloride	576mg	93mg	168mg	837mg	581.3mg
Phosphorus	145.4mg	116mg	0mg	261.4mg	181.5mg

The sandwich provides 956kJ/228kcal of energy per 100g.

Step 3 – Identify what nutrition claims you can make on your food product

I find from the list of nutrition claims (pages 6 and 7) I can make the following claims:

A ‘high fibre’ claim

‘Source of’ several vitamins and minerals (after considering levels on page 9)

All of these claims are shown below:

Nutrient	Amount in sandwich per 100g	Nutrition claim
Protein	9.9g (17.4% energy from protein*)	Source of protein as protein supplies at least 12% of the energy value
Fibre	3.5g	Source of fibre as contains at least 3g fibre per 100g or product

* % energy from protein:
$$\frac{9.9 \times 4}{228} \times \frac{100}{1} = 17.4\%$$

Using the information from the table on page 9, the following permitted micronutrient nutrition claims can be identified.

Micronutrient	Total amount in sandwich per 100g	‘Source of’	‘High in’
Vitamin E	4.2mg	✓	✓
Folic Acid	35.7µg	✓	✗
Biotin	9.6µg	✓	✗
Chloride	581.3mg	✓	✓
Phosphorus	181.5mg	✓	✗

Step 4 – Identify what health claims you can make on your food product

I have identified that I can make six nutrition claims on my food product.

I can now look up the Community Register of Claims to find out what authorised health claims are permitted based on these nutrients.

For this example I will outline some of the health claims that may be possible for my product because of its vitamin E content (please note there are several other claims that may be possible for this product based on the other five nutrients it contains in significant amounts).

Product	Nutrient	Authorised health claims
Egg sandwich with wholemeal bread and polyunsaturated spread Food Codes: 11-476, 12-806, 17-551	Vitamin E	Vitamin E contributes to the protection of cells from oxidative stress



4. Vitamin D Food Supplement

Step 1 – Describe your food product

My food product is a food supplement in capsule form containing 5µg of vitamin D (in form D3 or cholecalciferol) per capsule.

Step 2 – Find out the nutritional content of your food product

I already know that my product provides 5µg of vitamin D (as cholecalciferol or D3) per capsule. One capsule is the daily serving size of my product. I know the exact Vitamin D content because I formulated my product to provide a specific amount of vitamin D.

Nutrient	Amount per capsule	%NRV
Vitamin D (D ₃ ; cholecalciferol)	5µg	100%

Step 3 – Identify what nutrition claims you can make on your food product

I find from the list of nutrition claims (pages 6 and 7) I can make the following claims:

Micronutrient	Amount per capsule	'Source of' Vitamin D	'High in' Vitamin D
Vitamin D (D ₃ ; cholecalciferol)	5µg	✓	✓

Step 4 – Identify what health claims you can make on your food product

I have identified that I can make a nutrition claim on my food product.

I can now look up the Community Register of Claims to find out what authorised health claims are permitted based on this nutrient.

For this example I will outline all of the health claims that may be possible for my product because of its Vitamin D content (please note there are no other claims possible for this product as this product only contains Vitamin D).

Product	Nutrient	Authorised health claims		
Vitamin D Food Supplement	Vitamin D (D ₃ ; cholecalciferol)	Vitamin D has a role in the process of cell division	Vitamin D contributes to normal blood calcium levels	Vitamin D contributes to the maintenance of normal bones
		Vitamin D contributes to the maintenance of normal muscle function	Vitamin D contributes to the maintenance of normal teeth	Vitamin D contributes to the normal function of the immune system
		Vitamin D contributes to normal absorption/ utilisation of calcium and phosphorus	Vitamin D is needed for normal growth and development of bone in children (Art. 14(1)(b) children's health and development)	

Notes



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