

**Food Profile Guidelines:
Advertisements of Foods and Beverages
Whose Overconsumption Is Not
Recommended for Children**

Issued by the Turkish Ministry of Health,
Turkish Public Health Association.



JUSTIFICATION

These guidelines have been issued to put into effect the “food profile list” created in accordance with the following legislation: **Law No.6112 on the Establishment of Radio and Television Enterprises and Their Media Services** (Date of Adoption: 15/02/2011, Published in Official Gazette no 27863 of 3/3/2011)

CHAPTER FOUR

Article 9-

(6) Without prejudice to the principles and standards stipulated in Article 8, commercial communication;

ç) shall not impair physical, mental or moral development of children; shall not directly exhort children, by exploiting their inexperience or credulity, to buy or hire a product or service; shall not directly encourage them to persuade their parents or others to purchase the goods or services being advertised; shall not exploit their trust in their parents, teachers or other persons, or unreasonably display children in dangerous situations,

(7) **Commercial communication of foods and beverages containing nutrients and substances that are not recommended to be excessively consumed in the overall diet shall not be inserted in or accompanied with the children’s programmes.**

and By-Law On The Procedures And Principles Of Media Services

(Published in Official Gazette no 28103 of 02.11.2011)

CHAPTER FOUR

Article 9-

(7) (Amended: OG 374/2014-2896) Commercial communications of foods and beverages, containing nutrients and substances such as fats, trans-fatty acids, salt/sodium and sugars, excessive consumption of which are not recommended in general nutrition diets;

a) shall not accompany the children’s programmes at the beginning / end or shall not be included in the children’s programmes.

b) when accompany or inserted within the programmes other than the children’s programmes, they shall be broadcast with a streaming text at the bottom of the screen which is easily readable by the audience with warnings promoting a regular and balanced diet.

c) The list to be prepared by the Ministry of Health shall be taken as the basis in determining the foods and beverages, excessive consumption of which are not recommended in general nutrition diets.

Introduction

Obesity is a major public health issue on global scale. It is growing day by day in both developed and developing countries. Overweight and obesity shortens the lifetime, increases the incidence of non-communicable diseases, and impairs the quality of life. Non-communicable diseases have a prominent share in healthcare spendings and constitute an obstacle to development. As a part of the global objectives set by the World Health Organization (WHO), countries are expected to cut the upward trend in obesity and diabetes by 2025, shrink the physically inactive population by 10%, and reduce salt consumption per capita by 30%.

According to the “Turkey Childhood Obesity Research (COSI-TUR 2013)” carried out in conjunction with 23 countries within the WHO European Region, 14.2% of the age 7-8 group is overweight while 8.3% are fat. Percentage of fat members is 8.6% in the age 7 group and 8% in the age 8 group. Further, while percentage of fatness is 10% in urban children, it is 6.6% for rural areas. In adults, share of obesity and overweight is 30% and 35% respectively, and this is a vital issue for preventing obesity in future generations. Showing an upward trend in parallel to obesity, type 2 diabetes has jumped from 7% to 13% in adult populations, nearly doubling over twelve years. National Burden of Disease Studies in 2004 and 2013 reveal that non-communicable diseases are leading causes of death. For our country, risk factors for these diseases are poor nutrition diet, physical inactivity and tobacco use.

Ministry of Health has developed and is implementing prevention and control programs in line with international studies and country statistics.

In 2006, the WHO European Ministerial Conference on Counteracting Obesity was held in Istanbul and the European Charter on Counteracting Obesity was signed. To this end, the “Healthy Nutrition and Active Life Program of Turkey”, incorporating various measures to ensure an efficient and balanced nutrition and promote physical activity in combating obesity was developed and published as a Prime Ministerial Circular in the Official Gazette no 27714 of September 29, 2010. The program is currently being implemented. In the foregoing program, clause B “Actions for Obesity Prevention”, sub-clause B.5 “Supporting Adequate and Balanced Nutrition and Active Life in Media News and Advertisements” covers the action of “reducing the marketing of foods and beverages with high sugar, salt and fat content to children (prohibiting the broadcast of such advertisements in children’s programmes).

Action Plan on the European Strategy for the Prevention and Control of Noncommunicable Diseases in the WHO European Region (2012-2016) and the UN Ministerial Meeting on the Prevention of Noncommunicable Diseases primarily call for governments to take urgent measures in an aim to prevent and control noncommunicable diseases, primarily obesity.

The Strategic Plan issued by the Turkish Ministry of Health (2013-2017) incorporates, among others, the aim of “developing healthy dietary habits, increasing physical activity level and

decreasing obesity” under the “Strategic Objective 1: Protecting individuals and society from healthcare risks and promoting a healthy lifestyle”. Moreover, Article 170 of the Tenth Development Plan issued by the Turkish Ministry of Development for the period 2014-2018 specifies that “programs and action plans for healthy life such as combating inadequate physical activity, obesity and tobacco use have been launched, and these programs need to be improved and practically optimized.” In addition, the objective no 1.21 of the Plan, titled “Healthy Life and Mobility Program” aims to increase the ratio of people having adequate physical activity among 15+ population to 62%. In the foregoing component, our Ministry serves as the Coordinating Ministry.

In the “Program for Developing Multi-Stakeholder Health Responsibility” published as a Prime Ministry Circular in the Official Gazette no 29214 of 23.12.2013, it is underlined that protective health services should be developed across a multi-stakeholder approach, involving the individual, towards social, biological and physical environment, and that such approach should be directed by the views, suggestions and contributions of citizens and all other stakeholders including ministries, public bodies, universities, professional associations and non-governmental organizations.

The Initiative for Counteracting Obesity, which was signed in Istanbul, 2006, calls for member countries to issue regulations to restrict commercial incentives for and public influences of highly energy-intensive foods and beverages. In 2010, WHO developed specific recommendations. The initial edition of these recommendations for member countries was first published in our country in 2012, and WHO held the initial presentation in Ankara.

Children’s habits and attitudes towards eating and foods are influenced by the social environment. Therefore, commercial ads towards children are especially important, because researches suggest that children can not distinguish between a program content and an ad until the age of 10, and can not distinguish the whole purpose of advertising until the age of 12.

All over the world, environmental factors that promote excessive food intake and reduce physical activity play an important role in growing prevalence of obesity particularly during childhood.

Promotion of unhealthy foods and beverages in Europe has been found to be a major risk factor for the development of childhood obesity and noncommunicable diseases.

One of the actions recommended to countries in this respect is “Nutrition Profiling”.

On July 2013, the Ministers of Health of the WHO member states adopted the Vienna Declaration on nutrition and noncommunicable diseases within the “Health 2020” framework.

This declaration recognizes the high economic burden caused by unhealthy diet in many countries of the region, and raises concerns about obesity in children.

The Vienna Declaration encompasses a commitment to taking decisive actions to reduce food marketing pressure to children with regard to foods high in energy, saturated fats, trans-fatty acids, free sugars or salt, and common policy approaches encouraging the use of common nutrient profiling tools.

The development of a regional nutrient profile model for use or adaptation by Member States throughout Europe has been defined as one of the key actions of the European Food and Nutrition Action Plan, 2015-2020.

The nutrition profile model developed by the WHO Regional Office for Europe serves to this purpose and is specifically aimed at restricting the marketing of foods to children.

A report published by the Regional Office in 2013 has revealed that very few countries in the European Region have fully implemented restrictions on food marketing to children. One of the reasons for the slow progress of policy development is the difficulty of classifying the restrictions on food marketing due to lack of an appropriate food profile model or other difficulties in classifying the foods.

Since 2009, WHO has been assisting member states in developing their nutrition profile models. To this end, a “Guidelines Framework” was developed and various field works were carried out in six different countries. Additionally, WHO also developed a “catalogue” that details food profile models conforming to certain standards.

The “European Action Network On Reducing Marketing Pressure On Children led by the Norwegian Ministry of Health, involving a total of 28 Member States including Turkey and supported by the Regional Office, has carried out some initiatives on nutrient profile, and Member States have adopted, in Action Network meetings, the use and adaptation of a common nutrient profile model.

Some governments worldwide, such as Australia, Ireland, New Zealand, Norway, United Kingdom and United States, have developed nutrient profile models, some of which are already in force. During the process of developing nutrient profile by the WHO European regional office, three European models have been selected: Models developed by Denmark, Norway and United Kingdom. These are the three models currently used for marketing restrictions to children in Europe, either developed by governments (as in the case of the Danish model) or upheld by the government.

Among 53 countries in the WHO European Region, Denmark, Ireland, Norway and United Kingdom used the nutrient profile model in connection with marketing restrictions.

The Nutrient Profile Model

The nutrient profile model is the science of “classifying or ranking foods by their nutritional value for purposes such as preventing diseases, enhancing health, etc.

The nutrient profile model is recognized by WHO as a useful tool in a variety of actions and in critical practices for the application of marketing restrictions to children. The nutrient profile model is a tool that distinguishes foods and soft drinks, which are part of a healthy diet, from foods and soft drinks that are not recommended for excessive consumption (particularly foods that contribute to excessive energy consumption, saturated fat, trans fat, sugar and salt intake). Nutrition profile is a tool that categorizes not nutrition but foods, however can be employed as a policy for improving the overall nutritional quality of the diet.

Further indicators for the categorization of food products are provided using international harmonized tariff codes. Harmonized tariff codes for foods used in the regional office nutrient profile model have been adopted from the “Harmonized Commodity Description and Coding System”, used on global scale including the European Union. Each food product can be categorized by a specific tariff code. In this model, a code is structured basically of two segments. The first segment is a four-digit code representing the position number and widely associated with a food product category, and a six-digit subgroup code that provides more detail on the specific subcategory of the food product (where appropriate). At national level, tariff codes should be stated up to eight digits or up to the item number.

In the list issued as per the nutrient profile model developed by the WHO European Office for Member States and approved by the Ministry of Health’s Council for Science, marketing of foods and beverages to children is prohibited for seven categories, and no nutrition criterion is required. The same also applies to four food categories that can always be marketed freely, and also no nutrition criterion is required for the foods in this group.

Where a product contains >1g industrially produced trans-fat acid in each 100 g of total fat, it is prohibited from advertising.

“Foods and beverages with specified nutrient criteria are allowed for advertising only if they satisfy the requirements established. There are twelve food categories in this group.

Fulfilling these criteria is the obligation of the entity; and requires the submission of a declaration of conformity to the broadcasting organization.

If there is a complaint about the product for compliance with the food criteria, RTUK and Supreme Council for Advertisement takes the necessary measures.

How Should this Model be Used?

This guide and list is designed for use by RTUK to oversee food and beverage advertising to children. RTUK (or entities) should follow the following steps when determining whether a food product should be advertised to children under the applicable regulation:

1. **The food category of the product should be identified.** In some cases, this food category may be stated very clearly by name (e.g. cereals, yoghurt). And in some cases, it may be necessary to refer to the column indicating the “category assigned to the product” or the “category not assigned to the product” and/or the harmonized tariff code.
2. **Once the appropriate food category has been identified, the nutrient content of the food product should be cross-checked for the threshold value.** As a requirement to allow for the marketing of a food product, the respective threshold in each 100g / 100ml in such category should not be exceeded. For example, in cereals, a product should not exceed the total fat, total sugar or salt criteria.
3. Food products should be **assessed**, if possible, either in its sold condition, or in its reworked condition **according to the manufacturer’s instructions.**
4. Where the ad is for a restaurant meal including two or more menu varieties, fast service or takeaway, each of these varieties should individually meet the respective nutritional criteria.
5. If the product is a food with a protected designation of origin, protected geographical indication or a guaranteed traditional speciality, then marketing can be allowed pursuant to the national legislation.

Description of the Terms Used in the Nutrition Profile

Total fat is related to the total fat content composed of various levels of fat acids of the food product in three broad groups (saturated, monounsaturated and polyunsaturated):

Total sugar is related to the total sugar content of the food product: Sugars present in fruits and vegetables; milk sugars (lactose and galactose); and all additional monosaccharides and disaccharides added to foods food by the manufacturer, cook or consumer, plus sugars naturally present in honey, syrup and fruit juices.

For the purposes of this nutrient profile model, the term “**additional sugar**” has been used because data available in food composition tables refer to sugar; here, sugar is defined as all monosaccharides and disaccharides added to foods and soft drinks by the manufacturer, cook or consumer during processing or preparation. Free sugars in WHO sugar guides: there refer to monosaccharides (such as glucose and fructose) and disaccharides (sucrose and table sugar) added to foods by the manufacturer, cook or consumer during processing or preparation, as well

as sugars present in honey, syrup, fruit juices and concentrated fruits (*sugars naturally present in fruits and vegetables are not classified as “free sugars”*).

Sugar-free sweeteners are food additives (except for mono- and di-saccharide sugars) that give food a sweet taste. Technological purposes of this functional class include sweeteners and intensive sweeteners, bulk sweeteners. It should be noted that sugar, honey and other food ingredients used for sweetening purposes are not associated with the term “sweetener”.

Energy refers to the total chemical energy present in the food and the macro nutrient components of the food (carbohydrates, fats, proteins).

Saturated fat refers to primary saturated fatty acids in the food, namely C14, C16 and C18, except for saturated fatty acids ranging from C4 to C18 in fat, milk and coconut oil.

Industrially produced trans fatty acids refer to trans fatty acids that are 18:1 isomers typically obtained by the partial hydrogenation of vegetable oils. Semi-solid fats produced by this method are used in **commercial cooking and frying, margarines and food production**.

Salt –1 g of sodium is equivalent to approximately 2.5 g of salt. (Salt = Sodium x 2.5)

Annex 1: The Food Profile Model Approved By The Ministry Of Health’s Council For Science & Food and Beverage List

Annex 2: Harmonized System Code (HSC)

References

1. Law No.6112 on the Establishment of Radio and Television Enterprises and Their Media Services (Published in Official Gazette no 27863 of 15/2/2011).
2. Regulation for the Principles and Procedures of Broadcast Services published in the Official Gazette no 28103 of 02.11.2011
3. Turkish Ministry of Health's Healthy Nutrition and Active Life Program of Turkey (2013-2017), Ministry of Health, Ankara, 2013.
4. Turkish Ministry of Development's Tenth Development Plan (2014-2018), Ankara, 2014.
5. European Charter on Counteracting Obesity, WHO European Ministerial Conference Report, WHO, 2007.
6. Ministry of Health's Strategic Plan, 2013-2017
7. Action Plan for Implementing of The European Strategy for the Preventing and Control of Non-Communicable Diseases, 2013-2010.
8. European Food and Nutiriton Action Plan, WHO, 2015-2020.
9. WHO Regional Office for Nutrient Profile Model, WHO, 2015.

Annex 1: THE FOOD PROFILE MODEL APPROVED BY THE MINISTRY OF HEALTH'S COUNCIL FOR SCIENCE & FOOD AND BEVERAGE LIST



List of Foods and Beverages Prohibited From Advertising



List of Foods and Beverages Conditionally Allowed For Advertising



List of Foods and Beverages Allowed For Advertising

LIST OF FOODS AND BEVERAGES PROHIBITED FROM ADVERTISING

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criterion / Assessment
1. Chocolates and Confectionery, Wafers, Energy Bars, Sweet Sauces and Desserts	Other products containing chocolate and cacao; White chocolate, jelly, candies, boiled desserts, gumballs Caramels Liquor desserts Spreadable chocolate and other sweet sauces Hazelnut-peanut butters Grain, granola, muesli bars Almond butter	17.04; 18.06; partially 19.05; 20.06; partially 20.08; partially 21.06	All foods in this category are prohibited from advertising.
2. Cakes, Sweet Biscuits, Fruit Pies, Chocolate-Coated Biscuits, Cake Mixes	Pastries Croissant Cookies Biscuits Sponge cakes Birthday cakes Waffle Fruit pies Sweet buns and cupcakes Chocolate-coated biscuits Cake mixes, fritter-like desserts Baklava varieties	19.01.20; 19.05.20; 19.05.31; 19.05.32	All foods in this category are prohibited from advertising.
3. Chips, Crispy Nuts	All chips and crispy nuts	19.04.10; 19.04.20; partially 19.05	All foods in this category are prohibited from advertising.

LIST OF FOODS AND BEVERAGES PROHIBITED FROM ADVERTISING

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criteria For Advertising
4. Fruit Juices - D	100% fruit and vegetable juices Concentrated fruit and vegetable juices, smoothies	20.09	All foods in this category are prohibited from advertising.
5. Energy Drinks - F		Partially 22.02	All beverages in this category are prohibited from advertising.
6. All Sugar-Sweetened or Artificially Sweetened Soft Drinks - J	Cola drinks, Lemonades, Orange drinks, sodas Other soft drinks Sugar-sweetened or artificially sweetened mineral and/or flavoured water (including carbonated water)	22.01; partially 22.02	All beverages in this category are prohibited from advertising.
7. Edible Ices	Ice-cream Frozen yoghurt Ice candies (fruit ices) Sorbe	21.05	All foods in this category are prohibited from advertising.

FOOD AND BEVERAGE CATEGORIES ALLOWED FOR ADVERTISING SUBJECT TO FOLLOWING REQUIREMENTS

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criteria For Advertising
1. Salty/Spicy Snacks	Popcorn and cornflakes, grains (nuts) Hazelnut and hazelnut mixes, salty biscuits crackers Other snacks made of rise, corn, dough or potato	08.01; 08.02; 10.05; 19.04.10, 19.04.20; partially 19.05; 20.05.20; 20.08.11; 20.08.19; 20.08.99	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Added Sugar (g): 0 - Salt (g): 0.1-C
2. Milk Drinks-E	Sweetened milks Almond Soy Rice Oat milks	Partially 04.01; partially 04.02; 22.02.90	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 2.5 - Added Sugar (g): 0 - Non-sugar sweeteners (g): 0

FOOD AND BEVERAGE CATEGORIES ALLOWED FOR ADVERTISING SUBJECT TO FOLLOWING REQUIREMENTS

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criteria For Advertising
3. Cereals - G	Oatmeal Cornflakes Chocolate cereals Muesli	19.04.10; 19.04.20	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 10 - Total sugar (g): 15 - Salt (g): 1.6
4. Yoghurt, Sour Milk, Kefir, Cream, Other Similar Foods	Yoghurt, Whole-fat milks Flavoured creams Fermented milks and yoghurt drinks Cheese-based and other yoghurt substitutions Yoghurt products containing additives (such as fruit yoghurt, muesli, etc.)	Partially 04.02; 04.03; 04.04; partially 04.06.10; 19.01.10; 19.01.90; partially 21.06	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 2.5 - Saturated fat (g): 2 - Total sugar (g): 10 - Salt (g): 0.2-C
5. Cheese	Semi-hard and hard cheese Soft cheese Fresh cheese (such as ricotta and mozzarella) Grated or powdered cheese Cottage cheese Processed cheese products	4.06	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 20 - Salt (g): 1.3

FOOD AND BEVERAGE CATEGORIES ALLOWED FOR ADVERTISING SUBJECT TO FOLLOWING REQUIREMENTS

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criteria For Advertising
6. Convenience Foods and Composite Meals	Pizzas Lasagne and other sauce pastas Quiches Ready-to-eat meals Ready-to-eat sandwiches Stuffed pastas Soups and dishes Mixes and doughs	Partially 16; partially 19.01.20; 19.02.19; 19.02.20; partially 19.05; partially 20.05; 21.04	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 10 - Saturated fat (g): 4 - Total sugar (g): 10 - Salt (g): 1 - Energy (kcal): 225
7. Butter, Other Fats and Oils	Butter Vegetable oils Margarines	04.05;15	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Saturated fat (g): 20 - Salt (g): 1.3
8. Bread and Bread Products	Regular bread (containing cereal, yeast and salt) Gluten-free bread; yeast-free bread Dried bread Rusk and sandwich loafs	19.05.10; 19.05.40; 19.05.90	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 10 - Total sugar (g): 10 - Salt (g): 1.2

FOOD AND BEVERAGE CATEGORIES ALLOWED FOR ADVERTISING SUBJECT TO FOLLOWING REQUIREMENTS

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criteria For Advertising
9. Fresh or Dried Pasta, Rice and Cereals		10; partially 11; 19.02; excluding 19.02.20	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 10 - Total sugar (g): 10 - Salt (g): 1.2
10. Processed Meat, Chicken, Fish, etc.	Sausage, salami, ham, bacon, sausage, nugget Smoked or pickled fish Canned fish in brine or oil Fish fingers or fried fish	02.10; partially 03; partially 16	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 20 - Salt (g): 1.7
11. Processed Fruits and Vegetables	Canned fruits Vegetables and legumes Dried fruits Vegetables and legumes; marmalade Jam Pickles, pickled fruits and vegetables Boiled fruits; fruit peels Fried frozen potato chips Sugar-added frozen fruits	07.10; 07.11; 07.12; 07.13; partially 08.03; partially 08.05; partially 08.06, 08.11, 08.12, 08.13 and 08.14; 20.01; 20.02; 20.03; 20.04; 20.05; 20.06; 20.07; 20.08.20, 20.08.30, 20.08.40, 20.08.50, 20.08.60, 20.08.70, 20.08.80; 20.08.93; 20.08.97; 20.08.99	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 5 - Total sugar (g): 10 - Added sugar (g): 0 - Salt (g): 1

FOOD AND BEVERAGE CATEGORIES ALLOWED FOR ADVERTISING SUBJECT TO FOLLOWING REQUIREMENTS (cont'd)

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criteria For Advertising
12. Sauces, Dips and Salad Dressings	Salad dressings Tomato ketchup Mayonnaise Dips Soy sauce Mustard and mustard powder	21.03	Any product in this category is allowed for advertising if 100 g of the product is limited to the following ingredients: - Total fat (g): 10 - Added sugar (g): 0 - Salt (g): 1

FOOD AND BEVERAGE CATEGORIES ALLOWED FOR ADVERTISING

Food Category	Examples of Foods and Food Groups In This Category	Harmonized System Code (HSC) of Products In This Category	Criteria For Advertising
1. Fresh and Frozen Meat, Chicken, Fish, etc.	Eggs	10; partially 11; 19.02; excluding 19.02.20	All foods in this category are allowed for advertising.
2. Fresh or Dried Vegetables, Fruits and Cereals	Fruits and Vegetables Dry legumes Starchy vegetables Roots and tubers	07; 07.10, 07.11, 07.12, excluding 07.13; partially 08; excluding 08.01; 08.02; 08.11; 08.12; 08.13; 08.14	All foods in this category are allowed for advertising.
3. Milk Drinks-E	Plain, sugar-free, sweetener-free and flavour-free milk	Partially 4.01	All foods in this category are allowed for advertising.
4. Plain Yoghurt, Buttermilk	Plain, sugar-free, sweetener-free and flavour-free yoghurt	Partially 04.02; 04.03; 04.04; partially 04.06.10	All foods in this category are allowed for advertising

Abbreviations and Notes

Sat. Fat = saturated fat

- A.** Where appropriate, a four-digit position code is provided. “partially” means that the position code covers majority (but not all) of the food products. In some cases, a six-digit sub-position code is provided so that certain products can be located more easily.
- B.** Where appropriate, food products should be reassessed either as sold or (if necessary) as per manufacturer’s instructions.
- C.** Salt equivalent
- D.** As specified in the WHO Guidelines on Sugar Intake for Children and Adults (in press); fruit juices are a major source of free sugar for children. However, in accordance with national legislation and nutritional guidelines, some countries may decide to allow for the marketing of 100% fruit juices in small portions.
- E.** Follow-on formulas and growing-up milks are not covered by this model. According to the World Health Assembly Resolution (WHA 39.28) adopted in 1986, the practice being introduced of providing infants with specially formulated milks (so-called follow-up milks) is not necessary. In addition, the use of any food and drink by infants prior to complementary feeding should not be encouraged and promoted as they may affect the initiation or maintenance of breastfeeding.
- F.** There is no consensus-agreement on the definition of energy drinks. However, such a category includes various soft drinks. While caffeine is considered as the primary component, there are usually a number of other ingredients. The most common of them are guarana, taurine, glucuronolactone and vitamins. A common characteristic of these drinks is the marketing of their real or perceived effects such as stimulating, energizing and performance boosting.
- G.** For this category, countries may choose a threshold value of some >6g dietary fibre for minimum dietary fibre content.

- H.** As specified in the WHO Guidelines on Sugar Intake for Children and Adults; dried juices are a major source of concentrated sugar for children. In addition, in accordance with national legislation and nutritional guidelines, countries may decide to allow for the marketing of dried fruits in small portions.
- I.** As specified in the WHO Guidelines on Sugar Intake for Children and Adults; dried juices are a major source of concentrated sugar for children. In addition, in accordance with national legislation and nutritional guidelines, countries may decide to allow for the marketing of dried fruits in small portions.
- J.** If, in 100 g of a product classified as Sugar- or Sweetener-Added soft drink, added sugar (g) does not exceed 0 and non-sugar sweeteners (g) does not exceed 0, it may be reassessed to allow for marketing of the product.
- K.** If, in 100 g of a product classified as chip or crispy nut, added sugar (g) does not exceed 0 and salt (g) does not exceed 0.1-C, it may be reassessed to allow for marketing of the product.