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# GUIDANCE ON VOLUNTARY ENERGY (kJ/KCAL) LABELLING FOR OUT OF HOME BUSINESSES (2017)

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Prepared by the Obesity and Food Policy Branch,  
Department of Health, on 06/02/2015 and reworked  
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Standards Agency in Northern Ireland, August 2017.

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# INTRODUCTION

1. This document is provided for catering companies who want to introduce voluntary energy kJ (kilojoules) and kcal (kilocalories) labelling. It will also be used by enforcement authorities, national associations and health professionals. It has been revised to incorporate the requirements of Regulation (EU) No. 1169/2011 on the provision of food information to consumers (EU FIC), specifically that businesses that choose to provide energy information must display values in both kJ (kilojoules) and kcal (kilocalories) for products sold in the out of home sector. This guidance gives both regulatory and best practice advice. It provides information on:

## **Part I – Provision of energy information (page 3-7)**

- **Legislation**  
Legal obligations  
Methods of obtaining nutrition information
- **Processes**  
Updating nutrition information  
Use of explanatory statements
- **Enforcement and guidance**  
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## **Part II – Ensuring the accuracy of energy information (page 8-12)**

- **Considerations before obtaining nutrition information**
- **Methods of obtaining nutrition information - including the processes that companies should consider implementing to ensure the information they provide is as accurate as possible**
- **Additional sources of professional advice**

## **Part III – Principles for displaying out of home energy labelling (page 13-19)**



# PART I PROVISION OF ENERGY INFORMATION

# LEGISLATION

## Legal obligations

2. Providing energy information for food sold loose in catering establishments is voluntary. However, if a business chooses to provide this information then it must meet the legal requirement that any information provided to the consumer is not misleading<sup>1</sup>.
3. The permissible methods of obtaining energy information are also set out in law, and provided below.

## Methods to obtain nutrition information

4. There are three legally accepted ways of obtaining nutrition information, which are set out in the EU Food Information for Consumers Regulation<sup>2</sup>:
  - the manufacturer's analysis of the food;
  - a calculation from the known or average values of the ingredients used; or
  - a calculation from generally established and accepted data.
5. In the UK 'generally established and accepted data' usually refers to the McCance and Widdowson's Composition of Foods dataset<sup>3</sup>. Other established data may be more suitable for imported foods; for example, Eurofir<sup>4</sup> or USDA Food Composition Data<sup>5</sup> may be more appropriate for foods imported from the United States.
6. A mixture of methods is permissible for the same menu, or even the same product if it is made up of different constituent parts. For example, for a beef pie made with bought-in pastry, data for the filling could be calculated and data from the supplier could be used for the pastry, to provide an overall figure for the pie.
7. If a company displays data that have been provided by a manufacturer or supplier, it is the company's responsibility to ensure they take reasonable precautions to ensure this information is correct. The expectation will vary depending on company size; for smaller

companies this may simply mean keeping a copy of the label providing the nutrition information, and ensuring the label information is representative of the food they serve, e.g. cooking method and portion size (further information is provided in Part II Manufacturer / supplier information, page 10). For larger companies it may mean this information forms part of the product specification agreed between the supplier and caterer.

8. If a catering establishment sells branded pre-packed products, e.g. crisps, which display nutrition information, the brand owner, not the caterer, is responsible for the information provided on the packet. Pre-packed products are subject to separate regulations. Responsibilities are detailed in Article 8 of EU FIC: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2011:304:0018:0063:EN:PDF>
9. Catering businesses that choose to provide energy information will need to develop and implement processes to ensure that energy information is as accurate as possible. This is discussed in more detail in Part II (page 8).

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1. Article 14 of the Food Safety (Northern Ireland) Order 1991, Regulation 4(b) of the General Food Regulations (Northern Ireland) 2004 and Article 7 of EU Food Information to Consumers Regulation (No. 1169/2011)
  2. <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=J:L:2011:304:0018:0063:EN:PDF> In particular Article 31 paragraph 4.
  3. The Integrated dataset is available at: <https://www.gov.uk/government/publications/composition-of-foods-integrated-dataset-cofid> A summary of this information is also available as a book: PHE/IFR, McCance and Widdowson's The Composition of Foods, Seventh Summary Edition. Cambridge: Royal Society of Chemistry.
  4. <http://www.eurofir.org/food-information/food-composition-databases-2/>
  5. <https://ndb.nal.usda.gov/ndb/>



## PROCESSES

### Updating nutrition information

10. Companies must have a process for updating nutrition information. It is expected that where the energy information changes, companies will be able to update the information as soon as practical, but as a minimum at the next menu reprint, or within six months, whichever is sooner.

### Use of explanatory statements

11. Companies have a legal obligation not to mislead the consumer. Only the courts can determine whether that obligation has been breached; however, companies may find it prudent (and it could assist a due diligence defence) to include a statement to the effect that the information given is provided in good faith, but there may be some variations due to the nature of the product and the products involved.
12. If a company decides to use an explanatory statement it should be displayed clearly and prominently, and be relevant for the company. The following standard wording is provided as an indication of what is acceptable, but need not be reproduced exactly.

The energy information is provided as a guide. It is calculated using average figures and based on a typical serving size.

Or

The energy information is provided as a guide. Whilst we ensure this is as accurate as possible, occasionally we will have to substitute ingredients and this may alter the energy value displayed.

13. **Important: companies that use such a statement will still need to demonstrate, for enforcement purposes, how they ensure their energy information is as accurate as possible and that menu information is updated as soon as practical, and as a minimum within the timescales outlined above.**

14. Councils take a risk-based approach to visiting food businesses and enforcement activity. The focus of enforcement is supporting businesses to comply with legislation. Although providing energy information at catering outlets is voluntary, there is legislation in place to ensure that any information provided by a business is not misleading for consumers.
15. Catering businesses that choose to provide energy declarations will therefore need to develop and implement processes to ensure that energy declarations are as accurate as possible. This is considered in more detail in Part II (page 8). As part of this, they may wish to discuss appropriate procedures with their local district council environmental health department.
16. Comparison of nutrition information obtained for the same product by different methods (laboratory analysis vs. calculated values) can result in significantly different values. However, each of the methods to obtain nutrition information set out by EU FIC on the provision of food information to consumers is legally acceptable. Enforcement officers should take account of the method used by companies to generate the information, and due consideration should be given to the constraints and variability introduced by the different approaches.
17. Where energy information has been based on calculated values from a recipe (using protein, fat, carbohydrate levels etc.), it is appropriate to review the processes, method, calculations and data used by the company, and where laboratory analysis has been used, it would be appropriate to compare this with a representative analytical sample for enforcement purposes.

## ENFORCEMENT AND GUIDANCE Tolerances

18. Foods often do not contain the exact nutrient levels as declared on the label/menu due to inherent variation in the ingredients, processing etc. However, the stated figures should not be misleading to consumers. 'Tolerances' represent the acceptable margin of difference between declared nutrient values and the nutrient values identified by control authorities.
19. The European Commission has published guidance for Member States' control authorities and food business operators on tolerances for nutrition labelling purposes. The guidance covers key nutrients (protein, fat, carbohydrates and dietary fibre) and helps ensure consistency of approach across the enforcement community. For further details, see: [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling\\_nutrition-vitamins\\_minerals-guidance\\_tolerances\\_summary\\_table\\_012013\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling_nutrition-vitamins_minerals-guidance_tolerances_summary_table_012013_en.pdf) And [https://ec.europa.eu/food/sites/food/files/safety/docs/labelling\\_nutrition-vitamins\\_minerals-guidance\\_tolerances\\_1212\\_en.pdf](https://ec.europa.eu/food/sites/food/files/safety/docs/labelling_nutrition-vitamins_minerals-guidance_tolerances_1212_en.pdf) Within the European Commission's guidance Table 1 on page 7 provides details of the tolerances applicable to nutrition information for food. Where a nutrition and/or health claim has been made, or vitamins and/or minerals have been added to food on a voluntary basis, the tolerances listed in Table 3 on page 11 apply.
20. Some foods are more heterogeneous than others, and therefore you would expect to see a greater variation in nutrient levels. As such, enforcement officers will consider a range of factors when comparing nutrition information they have obtained through analysis with declared values. For example, they will take into account the energy content of the food, what is reasonable for the size of business and the likely inherent variability of certain foodstuffs. An officer may then consider the energy declaration is outside reasonable parameters and decide it is appropriate to have further discussion with the company. This does not mean a company's information is misleading, but that further investigation may be appropriate.



## Guidance on related legislation

21. The relevant information from EU FIC has been described above. Guidance notes on these regulations can be found at: [https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/595961/Nutrition\\_Technical\\_Guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/595961/Nutrition_Technical_Guidance.pdf)
22. Voluntary nutrition or health claims must comply with the requirements of European Regulation (EC) No 1924/2006 on nutrition and health claims made on food<sup>6</sup>. Department of Health guidance on compliance with this Regulation can be found at: <https://www.gov.uk/government/publications/nutrition-and-health-claims-guidance-to-compliance-with-regulation-ec-1924-2006-on-nutrition-and-health-claims-made-on-foods>
23. Under this Regulation an energy declaration on its own is not a claim. However, if an implied low energy claim is made (e.g. only 1670 kJ/400 kcal), then companies should ensure they are complying with this Regulation. If companies are unsure whether they are making a claim, they should ask their local district council environmental health department.

6. <http://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:02006R1924-20121129&from=EN>



# PART II ENSURING THE ACCURACY OF ENERGY INFORMATION

# CONSIDERATIONS BEFORE OBTAINING NUTRITION INFORMATION

## Reproducibility

24. It is important that stated energy values are representative of the food served. To ensure this, clear processes are required to ensure the food can be reproduced consistently each time it is made.

25. This should include;

- standard recipes, which include weights and / or measures as appropriate;
- detailed cooking methods, including equipment and temperatures. This is particularly important if food is fried as the oil temperature will impact on how much oil is absorbed;
- portion control; and
- staff training or guidance to ensure staff all follow the recipe and portion sizes, for example to prevent differences occurring between different chefs.

26. Companies may also wish to consider whether as part of their normal quality assurance procedures they wish to spot-check a proportion of the information provided. This may give them confidence that the data are appropriate.

## Recording processes

27. It is recommended companies have processes in place so that, if challenged, they can:

- demonstrate the above, i.e. show detailed standard recipes, cooking methods, portion sizes and demonstrate staff knowledge of this;
- provide records of laboratory analysis, supplier information such as copies of manufacturer's labels or product specifications and / or calculations;
- demonstrate a process for updating information to reflect changes, which as a minimum should be every menu cycle or every 6 months, whichever is more frequent;
- demonstrate a process for dealing with substituted foods in-between menu changes:
  - long term (more than 30 days) - minimise impact on the energy declaration by trying to ensure the substituted product has a similar energy value;
  - short term (e.g. mis-pick from suppliers / if a company runs out of a product one day and uses a substitute) - keep a record of the substitution to show why the food was different on that day, for example a note could be made in the Safe Catering Pack or Safer Food Better Business diary; and
- demonstrate a process for communicating significant changes to the consumer.

# METHODS OF OBTAINING NUTRITION INFORMATION

## Manufacturer / supplier information

28. Manufacturers or suppliers may be able to provide nutrition information for their products<sup>7</sup>. If their information is used, the caterer must take care to ensure it accurately reflects the final dish they serve to the customer. The following should be considered as they may substantially alter the energy declaration:

- Is the information provided for the raw or cooked product?
- If raw, does the cooking method or cooking equipment change the nutrition value, e.g. is it cooked in oil, is there water loss or absorption of water (e.g. pasta)?
- If cooked, is it cooked in the same way in each of the company's outlets?
- Is anything added to the product before it is served, e.g. dressing, butter? This would need to be included in the energy declaration.
- Is the information provided per 100g or per portion? If it is per portion, does the manufacturer's recommended portion reflect the portion served? For example, the information may assume a lasagne is divided into 20 portions, but actually, it is divided into 16. If it is per 100g, information for a standard serving size will need to be calculated. It may be necessary to weigh the edible product (e.g. cake without packaging including cakeboard) before this can be done.

## Calculating information

29. Before deciding to calculate nutrition information it is necessary to think about the recipe and how the food is cooked. If the recipe is complicated with lots of ingredients and different cooking stages, it will be more difficult to calculate information accurately. The cooking method will also change the nutrition information. This is particularly important if food is fried, as an estimate of the amount of oil taken up by the food will be required.

30. Nutrition information can be calculated using established data such as McCance and Widdowson's the 'Composition of Foods Integrated Dataset' available on the Food Standards Agency website at: <http://www.food.gov.uk/science/dietarysurveys/dietsurveys/> A summary of this information is also available as a book<sup>8</sup>. Where compositional data are based on a standard recipe, the accuracy of any declaration will be dependent upon the recipe being followed.

31. There are many commercial software packages available that will calculate information. Software companies may also offer a recipe calculation service. It is important to make sure that the underpinning data source used by the software packages is based on the latest version of the McCance and Widdowson dataset.

32. MenuCal has been developed for food businesses in Northern Ireland to help you identify, manage and communicate required allergen information and calculate and display Calories on your menus. It has been developed with the input of chefs, caterers and small business owners. <https://www.menucalni.co.uk/Account/LogOn?ReturnUrl=%2f>

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7. "EU FIC made nutrition labelling a mandatory requirement from 13 December 2016 for most pre-packed foods"

8. PHE/IFR, McCance and Widdowson's The Composition of Foods, Seventh Summary Edition. Cambridge: Royal Society of Chemistry or <https://www.gov.uk/government/publications/composition-of-foodsintegrated-dataset-cofid>

33. The packages vary in what they can do and in cost, and most companies will allow trials of software before purchase. Many electronic stock control or kitchen management systems will also have nutrition information add-ons, and so potentially current systems may be able to be adapted to calculate nutrition information.

### Accuracy of calculated nutrition information

34. Nutrition information will be more reliable if:

- there is a detailed recipe including weights, e.g. '80g bread' not 'a slice of bread'. This should include anything added as food is served;
- there is a specified number of portions the recipe will serve;
- the portion size can be replicated so it is the same each time the food is served, e.g. by using a specific sized ladle to measure a portion;
- the correct name and product description of each ingredient in the recipe is chosen, e.g. semi-skimmed milk instead of milk; lean minced beef 5% fat instead of minced pure beef 10% fat;
- the manufacturer's nutrition data may be used where possible. This is likely to more accurately reflect the product being used compared with average data;
- when using a software package, the information is double checked once entered, especially weights and units of ingredients; and
- adjustments in the calculation are made to take into account weight change during cooking – some software packages will do this automatically. Information and examples of weight changes of food as a result of cooking can be found in McCance and Widdowson's *The Composition of Foods*.

35. The British Dietetic Association's Nutrition and Hydration Digest: Improving Outcomes through Food and Beverage Services: <https://www.bda.uk.com/publications/professional/NutritionHydrationDigest.pdf>

### Laboratory analysis: Choosing a laboratory

36. There are many laboratories that can undertake nutrition analysis. Any laboratory used should have ISO 17025 accreditation as a minimum. Ideally, they should also have United Kingdom Accreditation Service (UKAS) or similar Certification bodies e.g. INAB in the Republic of Ireland.
37. Details of where products can be sent for analysis can be obtained from the Food Standards Agency website, which lists details of official control laboratories in the UK: <http://food.gov.uk/enforcement/monitoring/foodlabs/foodcontrollabs>. This list is not exclusive of all the laboratories operating in the UK.
38. Laboratories can charge different amounts for tests, so it is worth obtaining quotes ahead of choosing a laboratory. They may also offer discounts for a large volume of samples.

### Nutrition information

39. Laboratory staff will refer to nutrients in the table below for the purpose of nutrient analysis.

Energy	Protein	Carbohydrate	Sugars	Fat	Saturated Fat	Fibre	Sodium <sup>9</sup>
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9. Note: Salt, rather than sodium, must be declared on food labels in accordance with EU FIC. Sodium can be converted to salt by multiplying by 2.5.

40. It may be helpful to note:

- to obtain information on kJ (kilojoules) and kcal (kilocalories), the laboratory needs to be asked for the energy content of the food. This means analysis is required as energy content will be calculated from the protein, carbohydrate and fat content of the sample.
- information on energy will be given in both kJ (kilojoules) and kcal (kilocalories).
- the laboratory report will provide information per 100g, so information for a standard serving size will need to be calculated.

### Preparing and sending a sample

41. In order to obtain accurate nutrition information, the sample needs to be reflective of an average serving of the food. If there is likely to be some variability in the product, e.g. different chefs, a pie where the amount of pastry will change dependent on where the serving is taken from, then several samples should be sent for analysis. The laboratory or a public analyst would be able to advise how many samples might be appropriate. If more than one sample of the same product is sent for analysis, the average energy value of all the samples should be used.
42. The food as it is plated up should be sent as the sample e.g. including dressing added as the food is served. It may be useful to check with the laboratory if only the edible component of the food should be sent, e.g. if meat should be taken off the bone. In addition, it may be helpful to check with the laboratory how samples should be sent to the laboratory and if they need to be sent in special packaging. Sometimes a laboratory will organise for samples to be collected.

### Additional sources of professional advice

43. The following are sources of additional advice: Consultant nutritionists or dietitians. If consultants are registered they will be listed on their respective professional organisations' websites:

- Association for Nutrition – [www.associationfornutrition.org](http://www.associationfornutrition.org)
- British Dietetics Association – [www.bda.uk.com](http://www.bda.uk.com)
- Freelance Dietitians – <http://www.freelancedietitians.org>
- Environmental health officers. Contact details for local services can be found at: <https://www.foodgov.uk/enforcement/find-food-safety-team>
- Public analysts - <http://www.publicanalyst.com/>

44. The catering sector is distinctly varied and this presents practical challenges to information provision, which needs to be applied in a flexible way and be suitable for all catering contexts.

45. The following four principles have been agreed for energy kJ (kilojoules) and kcal (kilocalories) labelling in catering establishments.<sup>10</sup>

1. Energy information is displayed clearly and prominently at point of choice;

2. Energy information is provided for standardised food and drink items sold;

3. Energy information is provided per portion/item meal; and for multi-portion or sharing items the number of portions will also be provided; and

4. Information on daily energy requirement is displayed clearly and prominently and in a way that is appropriate for the consumer.

46. The following guidance is not definitive or legally binding, but simply offers some practical advice to assist catering businesses to apply voluntary energy labelling. Businesses have the scope to provide additional information where there is supporting evidence that this aids consumer understanding and use of energy information.

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10. restaurants, quick-service restaurants, takeaways, cafés, pubs, sandwich shops, staff restaurants etc



# PART III

## PRINCIPLES FOR OUT OF HOME ENERGY LABELLING

## Principle 1: Energy information is displayed clearly and prominently at point of choice

### Point of choice

47. “Point of choice” relates to the place where prices are displayed and customers make their meal choices. Other locations may carry information about meal deals, or combination meals that may not always include prices. In outlets where menu information is located at several points, businesses may choose to provide energy information at each. For drive-through restaurants, we recommend energy information is displayed on menus at the order point and on promotional posters before the order point.
48. Point of choice is defined as menu boards in quick service restaurants, and or on menus/shelf edging etc in other business types. Other typical point of choice locations include (some outlets may contain multiple or all types):

#### Counter service outlets

- menu boards,
- counter menus,
- tickets or display information for items sold on a counter (e.g. pastries sold in a hot cabinet, or items sold in baskets on the counter)

#### Seated service outlets

- menus
- table centres
- chalk boards
- menu boards

#### Self-selection outlets

- on packaging
- shelf edging
- menu/tariff boards
- labelling tags (i.e. held in crocodile clips, basket sides, hanging tags etc)
- Internet web pages where the foods are selected or compared with other products prior to purchase (e.g. ordering online for pizza delivery)

49. Places where energy information is displayed away from prices and/or that require customers to make an additional effort to obtain this information are not considered to be at point of choice, unless there is robust evidence to show that other points are equally effective.

### Displaying clearly and prominently

50. Evidence shows that energy information needs to be displayed clearly and prominently, so that customers can use it to help make healthier choices<sup>11</sup> at a glance.
51. The principles state that energy information is to be “clear and prominent” and it is for businesses to decide how to achieve this. They do not state a font, size or colour that businesses should use. Menu designs can still be creative and distinctive and fit around businesses’ existing styles and branding whilst ensuring that energy information is clear and prominent.
52. As a guide, prominent energy labelling can be achieved by the following means:
- energy information is clear;
  - energy information is positioned close to the price of the item, item description or image;
  - the font and format are at least as prominent as the name or price;
  - colour contrast is used appropriately, so that energy information stands out and can be easily differentiated from price;
  - on printed menus subtler presentation than the price/menu description can be used and still be prominent because customers usually have more time to look at these menus. The information still needs to be clear and noticeable to customers.
53. “kJ” and “kcal” EU FIC requires that businesses who provide food information to consumers that choose to provide energy information on their products must display energy values in both “kJ” (kilojoules) and “kcal” (kilocalories).

The information on “kJ” must come first. The information on “kcal” must not be displayed any more prominently than that on “kJ”, e.g. the font size used for “kcal” must not be bigger than that used for “kJ”.

11. An Evaluation of Provision of Calorie Labelling by Catering Outlets, BMRB Social Research – Qualitative, Social Science Research Unit, Food Standards Agency, December 2009

## Principle 2: Energy information is provided for standardised food and drink items sold

54. Standardised items means a reproducible product that is offered for at least 30 days in a year. It is important that stated energy values are representative of the food served. To ensure this, clear processes are required to ensure the food can be reproduced consistently each time it is made. For further information, see parts I & II.

### Coverage

55. Businesses may find that in certain circumstances, and for some food and drink, it may not be possible to display energy information for each and every product, for example:
- where there is too much information to display (e.g. a coffee board with multiple sizes, drinks and milks);
  - if the food/drink can be customised (e.g. a sandwich deli bar);
  - if you are displaying information for meal deals;
  - If food and drink are offered for a limited period (i.e. less than 30 days); and
  - where portion size is not controlled (e.g. for self-service buffet) (see guidance on principle 3);
56. In these cases, the following approaches could be used, which would help customers to make an informed choice:

### Displaying the “default option”

57. Where potentially there is a lot of energy information to display (products with different sizes, additions and choices), energy information can be streamlined to help customers by providing energy values for the “default option”.

58. The “default option” is:
- the most popular choice, or
  - the food/drink served to customers when they do not specify their choice (e.g. semi-skimmed milk if they do not ask for skimmed milk in a drink).
59. This is a way to simplify the information but still clearly indicate the relative energy difference between the main types of product; for example, it may show the difference between different types of coffees although not between sizes, or alternative milks. It also enables businesses to provide simple information about their standard products before customers customise these.
60. Customers are helped by prominent accompanying text indicating that this is the default option and stating what the default option is.

### Foods changed/specified by the customer

61. Customers are helped by provision of energy information for the different options available when customising a food. One way of achieving this is to provide information for the default option, and then to indicate the relative change that other choices will make. The default option may be shown for the best-selling products, rather than all the possible options on a menu. Additional information can then be displayed for extra ingredients. For example, a sandwich deli bar may offer energy information for their most popular sandwiches and then separately display energy information for extra available options such as different fillings or spreads.

### Meal deals

62. It helps customers when information about meal deals is clear and easy to understand, allowing customers to know energy values of all the parts. Suggested formats for displaying ranges are covered in principle 3. Energy information can be shown for the most popular meal as a whole, and also for each item of the meal separately to assist the decision-making process of the consumer.

63. Where “go large”, or upsizing options or promotional offers linked to increased portion size become the default or most popular option, energy information for the largest options is most helpful.

**Food and drink offered for a limited period**

64. We recommend that businesses provide energy information for all standardised food and drink items. However, it may be difficult or too onerous to obtain information about foods and drinks that are “one offs” or appear on a menu for a limited period. Factors influencing this are many, including: the extra time taken to calculate or obtain energy values; changes made to the recipe by the chef, or changes to ingredients available on the day; or because the food is made up on the spot to suit customers.

65. For these reasons, food and drink offered for less than 30 days is not expected to carry energy information. However, it is useful for customers if information can be provided for these foods, especially where they account for a significant proportion of daily sales, and businesses are encouraged to provide it where possible. This is a decision for the individual business, dependent upon the degree of standardisation of the recipe and any other practical issues.

**66. Other considerations:**

- Pre-packaged food – consider additional point of choice energy information where the existing nutrition information on packaging is obscured by the way products are arranged or displayed.
- Alcoholic drinks are a significant source of energy to people, and this information is useful to consumers. They are covered at the discretion of businesses.

### Principle 3: Energy information is provided per portion/item/meal; and for multi-portion or sharing items the number of portions must also be provided

67. Energy information should be provided for what the consumer is purchasing, e.g. per portion/item/meal. For most food and drink, providing information is straightforward, but there are some circumstances that present additional challenges. These include:

- **shared foods** – dishes that can be shared between more than one person (e.g. a pizza);
- **self-service** - where the customer controls their own portion size;
- where there is a **range of values** - where content of the food/meal or a customer specified food/meal can have a varying energy value;
- **limited space** - where lack of space at point of choice prevents the display of energy information for all the options –see guidance for the “default option” in Principle 2.

68. When deciding how to proceed, it is important to consider the best display that will enable customers to easily use energy information in any situation. Some practical solutions to these issues are described below.

#### Shared foods or multiple portions

69. For shared food, it is most helpful to display the number of servings per dish and the energy information per portion. You may also wish to provide energy information for the complete dish. Two examples for displaying energy information for shared foods, which may aid customer understanding, are:

- For food sold as a dish to be shared or consumed by a specified number of people (e.g. sharing platter for 4, nachos for 2):
- The number of kJ and kcal per portion is displayed next to the item description. The number of servings per complete dish must also be given.

70. For food sold as a dish to be shared with no specified servings (e.g. large pizza, family meal): Energy information may be given for an illustrative or typical portion. It is helpful if this information is consistent with the way food is divided or served, e.g. per pizza slice. In this case, information about how many slices of pizza the dish provides must also be given. Energy information per complete item may also be provided.

#### Self-service foods

71. Portions are not always uniform for self-service foods, either because of the way the food is served, or because these are controlled by customers.

72. Using a standard sized serving method where possible (for example a standard size scoop spoon) will help. Typical energy information per serving can be displayed for self-service items (such as buffets, salad bars, sauces, dressings etc).

73. Where products are not served in standard portions (for example poured dressings, sauces, served using tongs) the use of an illustrative portion may be more appropriate (e.g. for salads/vegetables a level bowl, or dressings could be labelled per tablespoon or per 100g).

#### Foods with a range of values

74. Displaying energy values using ranges can often be difficult for customers to understand and is therefore best avoided. It may not be instantly obvious which food choices affect the energy values from the top to the bottom of an energy range. Using alternative methods, such as itemising, or providing the maximum would help customers' understanding.

#### Itemising choices

75. Itemising choices (providing energy information for each part of a meal/item) is a workable alternative to using ranges because customers then understand the differences in energy values for each part of the food/meal they may choose. Even if they do not calculate the overall energy content, the customer can still identify the lower

76. When itemising for combination or customised meals, energy information would be appropriate for:

- the main item (e.g. the burger/fried chicken/steak)
- components of the meal/food (e.g. chips, potatoes, salad)
- extras (e.g. sauces/cheese slices/dressings).

### Using the maximum value

77. Displaying a single maximum figure ensures customers do not underestimate their energy intake. This may be appropriate where the highest energy options are offered to customers as the default option and the customer would have to specifically request alternative options (e.g. diet drink options). It may also be useful where the range of values from highest to lowest is relatively small.

### Using ranges

78. If the use of ranges of energy values is unavoidable, for example because of space limitations, effort should be made to provide itemised energy information where possible or a typical energy content.

79. If using ranges, these two formats are the most helpful for customers:

- Minimum and maximum energy values in the range for a single food/drink (which can vary, such as a salad where dressing or mayonnaise etc can be added) are displayed.
- Minimum and maximum energy values for a number of items in combination (meal deal/combination meal/fixed menu).

80. If using ranges, it is useful for customers if the ingredients or elements of the meal that cause the changes in energy values are clearly displayed (e.g. drink options that range from sugar to low calorie diet drinks).

## Principle 4: Information on daily energy requirement is displayed clearly and prominently and in a way that is appropriate for the consumer

81. Information about people's average energy needs is an important tool that helps people to understand their food choices in the context of the rest of their diet and their daily needs.
82. Energy requirement information is effective when it can be easily seen by customers, although it does not need to accompany energy information everywhere. For example, in counter service outlets this could be done by providing one clear and prominent statement on the main menu board. For hand-held menus this information should be easy to find, prominent and located towards the front of the menu.
83. The information may be displayed away from point of choice where space is limited, e.g. on menu boards in Quick Service Restaurants, provided it is displayed clearly and prominently elsewhere in a location that customers will notice.

### Energy requirement wording

84. Provision of energy information for adults (preferably with an indication that a lower value applies to children) is proposed and use of one of the following statements is suggested to ensure consumers receive consistent information:
  - "Adults need around 8,400 kJ or 2,000 kcal a day";
  - "Women need around 8,400 kJ or 2,000 kcal a day";
  - "Women need around 8,400 kJ or 2,000 kcal a day, and men around 10,470 kJ or 2,500 kcal a day";
  - "Women need around 8,400 kJ or 2,000 kcal a day, children need less";
  - "Women need around 8,400 kJ or 2,000 kcal a day, and men 10,470 kJ or 2,500 kcal a day, children need less".

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