

# Statutory order on use of the Keyhole label <sup>1</sup>

The following is established pursuant to Art. 23, Art. 24 (2) and Art. 60 (3) in Act No. 526 of 24 June 2005 on foodstuffs:

## *Area of application*

**Art. 1.** This statutory order concerns the voluntary use of the Keyhole label.

## *The Keyhole label*

**Art. 2.** The Keyhole label is a voluntary nutrition label that, within the foodstuff categories listed in annex 2, emphasises the better choice of foodstuffs based on criteria relating to the fat content and, where relevant, sugar types, salt and dietary fibre.

2. The Keyhole label's graphical design can be seen in annex 1. The Keyhole label shall be accompanied by the sign ®.

3. The symbol can be used in either green or black print.

## *Conditions for use of the Keyhole label*

**Art. 3.** Sweetening agents (additives) and approved novel foods or new foodstuff ingredients with sweetening characteristics may not be used in Keyhole labelled foods.

2. Oil and/or other fat used in Keyhole labelled foodstuffs may contain a maximum of 2 grams of industrially produced trans-fatty acids per 100 grams of oil and/or fat.

**Art. 4.** The Keyhole label may only be used in the marketing of pre-packaged foodstuffs that are covered by the foodstuff categories covered by annex 2 and which conform to the criteria for all the nutrients associated with the foodstuff category in question.

**Art. 5.** The Keyhole label may only be used in the marketing of non-pre-packaged foodstuffs that are covered by foodstuff categories 12, 18 and 19 in annex 2 and which conform to the relevant criteria in the annex.

**Art. 6.** The Keyhole label shall be used on the wrapping of pre-packaged foodstuffs when it is also intended to use the label in any other form of marketing of these foodstuffs.

**Art. 7.** Foodstuffs that are intended for children under 3 may not be labelled with the Keyhole label.

## *Control and responsibility*

**Art. 8.** Businesses that use the Keyhole label in the marketing of foodstuffs shall ensure that the use of the symbol occurs in accordance with the specific criteria laid down in annex 2.

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<sup>1</sup> The statutory order has as a draft been notified in accordance with Directive 98/34/EC of the European Parliament and of the Council (the Information Procedure Directive) as amended by Directive 98/48/EC.

*Penalty clauses and entry into force*

**Art. 9.** Violation of Articles 3-8 in this statutory order is punishable by fine.

2. The punishment can increase to imprisonment for up to 2 years if the violation by action or omission was performed with intent or through gross negligence and the violation

- 1) caused injury or resulted in a risk of injury, or
- 2) achieved or was intended to achieve a commercial advantage for the person in question or for others.

3. Companies (legal persons) can assume criminal liability according to the rules in chapter 5.

**Art. 10.** The statutory order enters into force on 17. June 2009.

2. Statutory order No. 330 of 3 April 2007 on the Nutrition Label shall be repealed on the same date.

3. For products included in group 8, the requirements regarding sodium content (the salt criteria) shall not come into force until 31 December 2011.

4. Keyhole labelled products that are marketed and labelled in accordance with other schemes may be marketed with the label until 17. December 2010 or until stocks are exhausted.

The Danish Ministry of Food, Agriculture and Fisheries, 9. June 2009

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**Annex 1**  
**Graphical design of the Keyhole label:**



## Annex 2

### Foodstuffs that may use the Nordic Keyhole label

a) General criteria for all food groups:

1) Foods with sweeteners and approved novel foods or novel ingredients with sweetener properties may not be labeled with key-hole mark, cf § 3. 1st

2) Oils and / or other fats used in keyhole-labeled products may contain a maximum total of 2 g of industrially produced trans fatty acids per. 100 g of oil and / or fat, cf § 3. 2nd

3) In this Order means 'wholegrain' as a whole seed of grain / cereal (grain, endosperm and bran), the seed can be ground, cracked or similar, but the components are intended for the respective foods, included in the same ratio as in the intact seed. 'Cereals' are wheat, spelt, rye, oats, barley, maize, rice, millet, durra and other Sorghum-species.

b) Criteria for the individual food groups:

Product group	Conditions
1. Milk and sour milk products without added flavouring.	- fat max. 0.7 g/100 g
2. Sour milk products with added flavouring.	- fat max. 0.7 g/100 g - sugars total max. 9 g/100 g
3. Vegetable products that are intended as an alternative to the products in product group 1.	- fat max. 1.5 g/100 g - saturated fatty acids max. 33% of the total fat content - sugars total max. 5 g/100 g - sodium max. 0.04 g/100 g
4. Products consisting of a mixture of milk and cream that are intended as an alternative to cream and similar sour milk products that are primarily intended for making food. The products may have added flavouring.	- fat max. 5 g/100 g - sugars total max. 5 g/100 g - sodium total max. 0.1 g/100 g
5. Wholly or partly vegetable products that are intended as an alternative to the products in product group 4.	- fat max. 5 g/100 g - saturated fatty acids max. 33% of the total fat content - sugars total max. 5 g/100 g - sodium max. 0.1 mg/100 g
6. Fresh cheese and similar products with added flavouring.	- fat max. 5 g/100 g - sodium max. 0.35 g/100 g
7. Whole or part vegetable products that are intended as an alternative to the products in product group 8. The products may have added flavouring.	- fat max. 17 g/100 g - saturated fatty acids max. 20 % of the total fat content - sodium max. 0.5 g/100 g
8. Other cheese (not processed cheese) and similar products with added flavouring.	- fat max. 17 g/100 g - sodium max. 0.5 g/100 g

9. Cooking fat and fat mixtures that are covered by Council Regulation 2991/94/EC on spreadable fats <sup>2</sup> and similar products with added flavouring.	<ul style="list-style-type: none"> <li>- fat max. 41 g/100 g</li> <li>- saturated fatty acids max. 33% of the total fat content</li> <li>- sodium max. 0.5 g/100 g</li> </ul>
10. Oils and liquid margarine.	<ul style="list-style-type: none"> <li>- saturated fatty acids max. 20 % of the total fat content</li> <li>- sodium max. 0.5 g/100 g</li> </ul>
11. Meat (muscle tissue) and liver from cattle, horses, pigs, sheep, goats, poultry or game that have not undergone any processing: it may however be carved, parted, sliced, boned, chopped, cut up, cleaned, trimmed, chilled, frozen or thawed.	<ul style="list-style-type: none"> <li>- fat max. 10 g/100 g</li> </ul>
12. Fish, shellfish, mussels and other molluscs that have not undergone any processing: they may however be carved, parted, sliced, boned, chopped, cut up, cleaned, trimmed, chilled, frozen or thawed.	
13A. Products produced from at least 50% meat (muscle tissue), liver or blood from cattle, horses, pigs, sheep, goats, poultry or game. The products may not be crumbed, but may contain sauce or brine. The percentage applies to the part of the product that is intended for consumption.	<ul style="list-style-type: none"> <li>- fat max. 10 g/100 g</li> <li>- sugars total max. 5 g/100 g</li> </ul> <p>The criteria apply to the part of the product that is intended for consumption.</p>
13B. Products produced from at least 50% fish, shellfish, mussels and other molluscs. The products may not be breaded, but may contain sauce or brine. The percentage applies to the part of the product that is intended for consumption.	<ul style="list-style-type: none"> <li>- fat other than fish fat max. 10 g/100 g</li> <li>- sugars total max. 5 g/100 g</li> </ul> <p>The criteria apply to the part of the product that is intended for consumption.</p>
13C. Products intended as the main protein component in a meal or as a cold cut and which consist of at least 95% vegetable raw products. The products may not be crumbed, but may contain sauce or brine. The percentage applies to the part of the product that is intended for consumption.	<ul style="list-style-type: none"> <li>- fat max. 10 g/100 g</li> <li>- sugars total max. 5 g/100 g</li> </ul> <p>The criteria apply to the part of the product that is intended for consumption.</p>
14. Ready-prepared dishes that are not covered by the product groups 15, 16 and 17, which are intended as a main meal and which contain: <ul style="list-style-type: none"> <li>- 400-750 kcal (1670-3140 kJ) per portion and</li> <li>- at least 25 g root crops, pulses (except ground nuts) and other vegetables and/or fruits and berries (excluding potatoes) per 100g product.</li> </ul>	<ul style="list-style-type: none"> <li>- max. 30% of the energy content may come from fat. If the product contains fish with a fat content of over 10%, max. 40% of the energy content in the product may come from fat, although the fat that does not come from fish may be max. 10 g per portion</li> <li>- sugars produced in pure form max. 3 g/100 g</li> <li>- sodium max. 0.4 g/100 g</li> </ul>
15. Pies (not desert pies), pirogues and pizzas based on cereals and which contain: <ul style="list-style-type: none"> <li>- at least 250 kcal (1050 kJ) per recommended portion, and</li> <li>- at least 25 g root crops, pulses (except ground nuts) and other vegetables and/or fruits and berries (excluding potatoes) per 100 g product. Moreover, the cereal part shall contain at least 15% wholemeal calculated on the basis of the dry matter content of the cereal part.</li> </ul>	<ul style="list-style-type: none"> <li>- max. 30% of the energy content may come from fat</li> <li>- sugars produced in pure form max. 3 g/100 g</li> <li>- sodium max. 0.5 g/100 g</li> </ul>
16. Sandwiches, wraps and similar products based on cereals and which contain:	<ul style="list-style-type: none"> <li>- max. 30% of the energy content may come from fat</li> </ul>

<sup>2</sup> Council Regulation (EC) No 2991/94 of 5 December 1994 laying down standards for spreadable fats.

<ul style="list-style-type: none"> <li>- at least 250 kcal (1050 kJ) per portion, and</li> <li>- at least 25 g root crops, pulses (except ground nuts) and other vegetables and/or fruits and berries (excluding potatoes) per 100 g product. Moreover, the cereal part shall contain at least 25 % wholemeal calculated on the basis of the dry matter content of the cereal part.</li> </ul>	<ul style="list-style-type: none"> <li>- sugars produced in pure form max. 3 g/100 g</li> <li>- sodium max. 0.4 g/100 g</li> </ul>
<p>17. Soups (finished products and dried soups after preparation according to the producer's instructions) and which contain:</p> <ul style="list-style-type: none"> <li>- at least 150 kcal (625 kJ) per portion, and</li> <li>- at least 25 g root crops, pulses (except ground nuts) and other vegetables and/or fruits and berries (excluding potatoes) per 100 g finished product.</li> </ul>	<ul style="list-style-type: none"> <li>- max. 30% of the energy content may come from fat</li> <li>- sugars produced in pure form max. 3 g/100 g</li> <li>- sodium max. 0.4 g/100 g</li> </ul>
<p>18. Fruit and berries that are not processed: they may however be cleaned, sliced, chilled, frozen or thawed.</p>	
<p>19. Potatoes, root crops, pulses (except ground nuts) and other vegetables that are not processed: they may however be blanched, dried, sliced, chilled, deep-frozen, thawed or preserved in water. The products may contain added flavouring.</p>	<ul style="list-style-type: none"> <li>- sugars produced in pure form max. 1 g/100 g</li> <li>- sodium max. 0.2 g/100 g</li> </ul>
<p>20. Bread and bread mixture where only water and possibly yeast shall be added (for bread mixture, the criteria apply to the finished product) and which contain at least 25% wholemeal calculated on the basis of the dry matter of the product.</p>	<ul style="list-style-type: none"> <li>- fat max. 7 g/100 g</li> <li>- sugars total max. 5 g/100 g</li> <li>- sodium max. 0.5 g/100 g</li> <li>- dietary fibre at least 5 g/100 g</li> </ul>
<p>21. Crisp bread and crusts that contain at least 50% wholemeal calculated on the basis of the dry matter of the product.</p>	<ul style="list-style-type: none"> <li>- fat max. 7 g/100 g</li> <li>- sugars total max. 5 g/100 g</li> <li>- sodium max. 0.5 g/100 g</li> <li>- dietary fibre at least 6 g/100 g</li> </ul>
<p>22. Pasta (not filled) that contains at least 50% wholemeal calculated on the basis of the dry matter of the product.</p>	<ul style="list-style-type: none"> <li>- sodium max. 0.04 g/ 100 g based on the dry matter of the product</li> <li>- dietary fibre at least 6 g/100 g based on the product's dry matter</li> </ul>
<p>23. Breakfast cereals and muesli that contain at least 50% wholemeal based on the dry matter of the product.</p>	<ul style="list-style-type: none"> <li>- fat max. 7 g/100 g</li> <li>- sugars produced in pure form max. 10 g/100 g</li> <li>- sugars total max. 13 g/100 g</li> <li>- sodium max. 0.5 g/100 g</li> <li>- dietary fibre at least 6 g/100 g</li> </ul>
<p>24. Flour, flakes, meal and split seeds from cereals that contain 100% wholemeal based on the dry matter of the product, and bran from cereals.</p>	<ul style="list-style-type: none"> <li>- dietary fibre at least 6 g/100 g</li> </ul>
<p>25. Porridge and porridge powder (for powder after preparation) that contains at least 50% wholemeal based on the dry matter of the product.</p>	<ul style="list-style-type: none"> <li>- fat max. 5 g/100 g</li> <li>- sugars total max. 5 g/100 g</li> <li>- sodium max. 0.2 mg/100 g</li> <li>- dietary fibre at least 6 g/100 g</li> </ul>

### Legal Notes

The order has been notified in accordance with the European Parliament and Council Directive 98/34/EC (Information Procedures Directive) as amended by Directive 98/48/EC.