



Regulation on voluntary labelling of foods with the Keyhole

Art. 1. Scope

This regulation applies to voluntary labelling and presentation of foods with the Keyhole. The Keyhole symbol is linked to the food's content of fat, sugars, dietary fibre or salt in the food groups listed in appendix 2.

Art. 2 Definitions

This regulation defines the following:

- a) Fat, saturated fatty acids, trans fatty acids, salt, sugars, dietary fibre, prepacked foods, nutritional labelling, meat (cf. art 2 f) and phytosterols, phytosterol esters, phytosterols and phytosterol esters as defined in the Regulation (EU) no. 1169/2011 of the European Parliament and of the Council on the provision of food information to consumers.
- b) Processing and unprocessed products as defined in Regulation 22 December 2008 No. 1623 on food hygiene of foodstuffs.
- c) Fishery products, prepared fishery products and live bivalve molluscs as defined in Regulation 22 December 2008 no. 1624 on special hygiene rules for foods of animal origin.
- d) Spreadable fats and spreadable fats blends: as covered and defined in Council Regulation (EU) no. 1308/2013 establishing a common organisation of the markets in agricultural products, see article 78 ref. annex VII on spreadable fats and similar products.
- e) Gluten-free as defined in Regulation 10 July 2009 No. 999 on the composition and labelling of foods for persons with gluten intolerance.
- f) Wholegrain (ground wholemeal flour): the entire grain including husk, germ, and bran. The grain can be crushed, ground or the like, but the component parts must be included in the same proportion as the respective cereal. The definition of wholegrain covers the following cereals: Wheat, spelt, rye, oat, barley, maize, rice, millet, durra and other sorghum species.
- g) Added sugars: all mono- and disaccharides added during the production of foods. Naturally-occurring sugars found in honey, syrups, fruit juices and fruit concentrates are also covered.
- h) Added flavourings: the addition of flavourings or food ingredients with flavouring properties as defined in Regulation 6 June 2011 No. 669 on flavourings and food ingredients with flavouring properties for use in and on foods.

Art. 3. Keyhole design

The graphic design is shown in appendix 1. The symbol must be followed by ®.

The Keyhole must be printed in green or black.

Art. 4. Products that can be labelled with the Keyhole



The Keyhole can be used for labelling and presentation of foods that fulfil all the conditions for that food group, cf. appendix 2.

The Keyhole can be used on:

- 1) prepacked foods listed in appendix 2 and
- 2) non-prepacked foods that belong to the following groups:
 - a) unprocessed vegetables etc. (food group 1)
 - b) fruits and berries (food group 2)
 - c) bread (food groups 8 a and 8 b)
 - d) crispbread (food group 9)
 - e) cheeses, except fresh cheese (food group 16)
 - f) vegetable alternatives to cheeses (food group 17)
 - g) fishery products (food group 21)
 - h) meat (food group 23)

Art. 5. Products that can not be labelled with the Keyhole

The Keyhole cannot be used for:

- 1) foods with the following ingredients added:
 - a) sweeteners (additives)
 - b) approved new foods and ingredients with sweetening properties,
 - c) phytosterols, phytosterol esters, phytosterols or phytosterol esters,
- 2) foods intended for children under 3 years.

Art. 6. Requirement for information for non-prepacked foods

If the Keyhole is used for the presentation of non-prepacked foods belonging to the following groups, the business must upon request be able to give information regarding the basis for the use of the Keyhole:

- a) bread (food groups 8 a and 8 b)
- b) crispbread (food group 9)
- c) cheeses, except fresh cheese (food group 16)
- d) vegetable alternatives to cheeses (food group 17)
- e) meat (food group 23)

Art. 7. General conditions

Conditions for labelling foods with the Keyhole:

- a) Oil or other fats used for the manufacture of Keyhole-labelled foods can contain max. 2 g industrially-produced trans fatty acids per 100 g fat or oil.
- b) Fat, sugars or salt can only be added in the food groups in which there are laid down conditions in appendix 2 for fat, sugars or salt. These nutrients may be added to foods in other food groups at the lowest level necessary to achieve the desired effect.

Art. 8. Supervision and decisions

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The Norwegian Food Safety Authority is the supervisory authority and can make necessary individual decisions in accordance with section 23 of the Food Act in order to achieve compliance with the provisions given in or pursuant to this regulation. The Norwegian Food Safety Authority can also make individual decisions in accordance with sections 24 to 26 of the Food Act.

Art. 9. Penalty

Infringement of the provisions given in this regulation or individual decisions given pursuant to the regulation is a criminal offence according to section 28 of the Food Act.

Art. 10. Transitional provision

Production and labelling of products is permitted until 1 September 2016 in accordance with the provisions of Regulation 17 June 2009 No. 665 on voluntary labelling of foods with the Keyhole.

Food products produced and labelled in accordance with the provisions of Regulation 17 June 2009 No. 665 on voluntary labelling of foods with the Keyhole until stocks are exhausted.

Art. 11. Entry into force and repeal of other regulations

This regulation enters into force 1 March 2015.

Simultaneously Regulation 17 June 2009 No. 665 on voluntary labelling of foods with the Keyhole is repealed.

Appendix 1. Graphic design

The Keyhole's graphic design:



Appendix 2.

Food product groups that can be labelled with the Keyhole and conditions pertinent to each group:	
Food product group	Conditions
Vegetables, fruit, berries and nuts	
1 Vegetables, root vegetables, legumes (except peanuts) and potatoes. The products can be processed. Unprocessed herbs are also covered.	– added fat not more than 3 g/100 g – added fat cannot contain more than 20 % saturated fatty acids – added sugars, not more than 1 g/100 g – salt, not more than 0.5 g/100 g
2 Unprocessed fruits and berries. The	

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products may however be heat-treated.	
3 Unprocessed nuts and peanuts. The products may however be heat-treated.	– saturated fatty acids, not more than 10 g/100 g
Flour, grain and rice	
4 Flour and grain from cereals that contain 100 % wholegrain of the product's contents of solids. Bran and germs are also covered.	– dietary fibre, not less than 6 g/100 g
5 Rice containing 100 % wholegrain of the product's content of solids.	– dietary fibre, not less than 3 g/100 g
6 Breakfast cereals containing at least 55 % wholegrain of the product's content of solids. For gluten-free breakfast cereals, the wholegrain requirement is not less than 20 % wholegrain of the product's content of solids.	– fat, not more than 8 g/100 g – sugars, not more than 13 g/100 g – of which added sugars, not more than 9 g/100 g – dietary fibre, not less than 6 g/100 g – salt, not more than 1,0 g/100 g
Porridge, bread and pasta	
7 Porridge and porridge powder (prepared according to the manufacturer's instructions) containing not less than 55 % wholegrain of the product's content of solids.	– fat, not more than 4 g/100 g – sugars, not more than 5 g/100 g – dietary fibre, not less than 1 g/100 g – salt, not more than 0.3 g/100 g The conditions apply to the ready-to-eat product.
8 a) Bread and bread mixes where only fluids and possibly yeast are added, and that contain not less than 30 % wholegrain of the product's content of solids. Products as defined in group 8 b) are not covered. For gluten-free bread and bread mixes, the wholegrain requirement is not less than 10 % wholegrain of the product's content of solids.	– fat, not more than 7 g/100 g – sugars, not more than 5 g/100 g – dietary fibre, not less than 5 g/100 g – salt, not more than 1,0 g/100 g The conditions apply to the ready-to-eat product.
8 b) Rye bread and other rye-based products plus bread mixes where fluid and possibly yeast are added, which contain at least 35 % wholegrain of the product's content of solids. Not less than 30 % of the cereals in the product must be rye.	– fat, not more than 7 g/100 g – sugars, not more than 5 g/100 g – dietary fibre, not less than 6 g/100 g – salt, not more than 1,2 g/100 g The conditions apply to the ready-to-eat product.
9 Crispbread and hardtack containing not less than 50 % wholegrain of the product's content of solids. For gluten-free crispbread and hardtack, the wholegrain requirement is not less than 15 % of the product's content of solids.	– fat, not more than 7 g/100 g – sugars, not more than 5 g/100 g – dietary fibre, not less than 6 g/100 g – salt, not more than 1,3 g/100 g
10 Pasta (unfilled) containing not less than 50 % wholegrain of the product's content of solids. Gluten-free pasta (unfilled) has no wholegrain requirement.	– dietary fibre, not less than 6 g/100 g – salt, not more than 0,1 g/100 g The conditions apply to the solid content of the product.
Milk, fermented dairy products and vegetarian alternatives	

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11 a) Milk and fermented dairy products intended for drinking, without added flavourings. Corresponding lactose-free products and lactose-free milk drink are also covered.	– fat, not more than 0,7 g/100 g
11 b) Vegetable products with the same range of uses as products in group 11 a), without added flavourings.	– fat, not more than 1,5 g/100 g – saturated fatty acids, not more than 33 % of fat content – sugars, not more than 5 g/100 g – salt, not more than 0,1 g/100 g
12 a) Fermented dairy products not intended for drinking, without added flavourings. Corresponding lactose-free products are also covered.	– fat, not more than 1,5 g/100 g
12 b) Vegetable products with the same range of uses as products in group 12 a) without added flavourings.	– fat, not more than 1,5 g/100 g – saturated fatty acids, not more than 33 % of fat content – sugars, not more than 5 g/100 g – salt, not more than 0,1 g/100 g
13 a) Fermented dairy products not intended for drinking, with added flavourings. Corresponding lactose-free products are also covered.	– fat, not more than 1,5 g/100 g – added sugars, not more than 4 g/100 g
13 b) Vegetable products with the same range of uses as products in group 13 a) with added flavourings.	– fat, not more than 1.5 g/100 g – saturated fatty acids, not more than 33 % of fat content – sugars, not more than 8 g/100 g – salt, not more than 0.1 g/100 g
14 a) Products that consist of a mix of milk and cream with the same range of uses as cream and similar fermented products, without added flavourings. Corresponding lactose-free products are also covered.	– fat, not more than 5 g/100 g
14 b) Wholly or partially vegetarian products with the same range of uses as products in group 14 a) without added flavourings.	– fat, not more than 5 g/100 g – saturated fatty acids, not more than 33 % of fat content – sugars, not more than 5 g/100 g – salt, not more than 0.3 g/100 g
15 a) Products that consist of a mix of milk and cream with the same range of uses as cream and similar fermented products, with added flavourings. Corresponding lactose-free products are also covered.	– fat, not more than 5 g/100 g – sugars, not more than 5 g/100 g – salt, not more than 0.8 g/100 g
15 b) Wholly or partially vegetarian products with the same range of uses as products in	– fat, not more than 5 g/100 g – saturated fatty acids, not more than 33 %

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group 15 a) with added flavourings.	of fat content – sugars, not more than 5 g/100g – salt, not more than 0.8 g/100 g
<i>Cheese and vegetarian alternatives</i>	
16 Cheeses, except fresh cheeses - group 18. The products can have added flavourings.	– fat, not more than 17 g/100 g – salt, not more than 1,6 g/100 g
17 Wholly or partially vegetarian products with the same range of uses as products in group 16. The products can have added flavourings.	– fat, not more than 17 g/100 g – saturated fatty acids, not more than 20 % of fat content – salt, not more than 1,5 g/100 g
18 Fresh cheese and corresponding products. The products can have added flavourings.	– fat, not more than 5 g/100 g – salt, not more than 0,9 g/100 g – added sugars, not more than 1 g/100 g
<i>Spreadable fats and oils</i>	
19 Spreadable fats and spreadable fat mixes. The products can have added flavourings.	– fat, not more than 80 g/100 g – saturated fatty acids, not more than 33 % of fat content – salt, not more than 1,1 g/100 g
20 Spreadable fats oils, liquid spreadable fats and liquid spreadable fat mixes. The products can have added flavourings.	– saturated fatty acids, not more than 20 % of fat content – salt, not more than 1,0 g/100 g
<i>Fishery products and products derived from fishery products</i>	
21 Fishery products and live bivalve molluscs. The products can be prepared.	
22 Products containing not less than 50% processed fishery products. The products can contain sauce or brine. The percentages and conditions apply to that part of the product intended for consumption. They can be breaded, but the preparation stated cannot add fat to the product.	
22 a) Products not covered by groups 22 b-d.	– other fats than fish fat, not more than 10 g/100 g – sugars, not more than 5 g/100 g – salt, not more than 1,5 g/100 g
22 b) Sandwich products, sliced.	– other fats than fish fat, not more than 10 g/100 g – sugars, not more than 5 g/100 g – salt, not more than 2,5 g/100 g
22 c) Smoked or marinated fish.	– other fats than fish fat, not more than 10 g/100 g – sugars, not more than 5 g/100 g – salt, not more than 3,0 g/100 g
22 d) Caviar and other semi-conserves of fish.	– other fats than fish fat, not more than 10 g/100 g – sugars, not more than 5 g/100 g – salt, not more than 3,0 g/100
<i>Meat and products made of meat</i>	

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23 Unprocessed meat.	– fat, not more than 10 g/100 g
24 Products containing not less than 50 % meat. The minimum requirement for meat in liver paste in group 24 b) is 35 %. The requirement for meat content can be lowered to 40 % if not less than 10 % of the meat is replaced by a vegetable ingredient with content of protein. The products can contain sauce or brine. The percentages and conditions apply to that part of the product intended for consumption. They can be breaded, but the preparation stated cannot add fat to the product.	
24 a) Raw products of whole or sliced meat pieces which are surface-marinated or spiced. - for injection salted products, nevertheless	– fat, not more than 10 g/100g – sugars, not more than 3 g/100g – salt, not more than 1,0 g/100 g – salt, not more than 0,5 g/100 g
24 b) Raw or ready-to-eat products in which ground/minced meat is the main ingredient. - for sausages, nevertheless - for sliced sausages, nevertheless - for beef mince, nevertheless	– fat, not more than 10 g/100 g – sugars, not more than 3 g/100g – salt, not more than 1.7 g/100 g – salt, not more than 2,0 g/100 g – salt, not more than 2.2 g/100 g – salt, not more than 1,0 g/100 g
24 c) Ready-to-eat or smoked products in which the main ingredient is whole or unsliced meat, and which is not covered by group 24 b). - for sliced products, nevertheless	– fat, not more than 10 g/100 g – sugars, not more than 3 g/100g – salt, not more than 2,0 g/100 g - salt, not more than 2.5 g/100 g
Vegetarian products	
25 Products that consist of not less than 60% vegetable ingredients. The products cannot contain meat and fishery products. The products can contain sauce or brine. The percentages and conditions apply to that part of the product intended for consumption. They can be breaded, but the preparation stated cannot add fat to the product.	– fat, not more than 10 g/100 g – saturated fatty acids, not more than 33 % of fat content – sugars, not more than 3 g/100 g – salt, not more than 1,0 g/100 g
Ready meals etc.	
26 Ready meals that are intended to be a complete meal with proteins, carbohydrates and vegetables, fruit or berries, and that are not covered by groups 27, 28, 29, 30 or 31. The meal should contain: – 400-750 kcal (1670-3140 kJ) per stated portion, and – not less than 28 g vegetables (except potatoes), legumes (except peanuts), root	– not more than 33 % of the energy content can come from fat – in products that contain fish with more than 10 % fat, energy content from fat can be not more than 40 %. – saturated fatty acids, not more than 33 % of fat content – added sugars, not more than 3 g/100 g – salt, not more than 0.8 g/100 g – but not more than 3.5 g salt in total per

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vegetables, or fruit and berries per 100 g product. If the meal contains a cereal element, it must fulfil the requirement for wholegrain as stated in the relevant food group. If gluten free pasta is included the requirement for dietary fibre in group 10 applies.	portion
27 Pirogues, pizzas and other pies than dessert pies, based on cereals and that contain: – not less than 250 kcal (1050 kJ) per stated portion, and – not less than 28 g vegetables (except potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g product. The cereal element must contain not less than 30 % wholegrain calculated from the cereal element's content of solids. For gluten free cereals the requirement for wholegrain is 10 % of the product's content of solids.	– not more than 33% of the energy content can come from fat – in products that contain fish with more than 10% fat, energy content from fat can be not more than 40% – saturated fatty acids, not more than 33 % of fat content – added sugars, not more than 3 g/100 g – salt, not more than 1,0 g/100 g
28 Open sandwiches, baguettes, wraps and similar products, based on cereals and that contain: – not less than 150 kcal (630 kJ) per stated portion, and – not less than 25 g vegetables (except potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g product. The cereal element must contain not less than 30 % wholegrain calculated from the cereal element's content of solids. For gluten free cereals the requirement for wholegrain is 10 % of the product's content of solids.	– not more than 33 % of the energy content can come from fat – in products that contain fish with more than 10 % fat, energy content from fat can be not more than 40 % – saturated fatty acids, not more than 33 % of fat content – added refined sugars, not more than 3 g/100g – salt, not more than 0,9 g/100 g
29 Soups with fish or meat (ready-to-eat products and products prepared according to the producer's instructions) that contain: – not less than 100 kcal (420 kJ) per stated portion, and – not less than 28 g vegetables (except potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g soup. If the meal contains a cereal element, it must fulfil the requirement for wholegrain as stated in the relevant food group. If gluten	– not more than 33 % of the energy content can come from fat – in products that contain fish with more than 10 % fat, energy content from fat can also be not more than 40 % – added sugars, not more than 3 g/100 g – salt, not more than 0.8 g/100 g – but not more than 2.5 g salt in total per portion.

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free pasta is included the requirement for dietary fibre in group 10 applies.	
30 Soups with no fish or meat (ready-to-eat products and products prepared according to the producer's instructions) that contain: – not less than 100 kcal (420 kJ) per stated portion, and – not less than 50 g vegetables (except potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g soup. If the meal contains a cereal element, it must fulfil the requirement for wholegrain as stated in the relevant food group. If gluten free pasta is included the requirement for dietary fibre in group 10 applies.	– not more than 33 % of the energy content can come from fat – added sugars, not more than 3 g/100 g – salt, not more than 0.8 g/100 g – but not more than 2.5 g salt in total per portion.
31 Ready meals that are not intended to be a complete meal, and that are not covered by the groups 26, 27, 28, 29 or 30. The meal should contain: – not less than 100 kcal (420 kJ) per stated portion, and – not less than 50 g vegetables (except potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g product. If the meal contains a cereal element, it must fulfil the requirement for wholegrain as stated in the relevant food group. If gluten free pasta is included the requirement for dietary fibre in group 10 applies.	– not more than 33 % of the energy content can come from fat – in products that contain fish with more than 10 % fat, energy content from fat can be not more than 40 % – saturated fatty acids, not more than 10 % of energy content – added sugars, not more than 3 g/100g – salt, not more than 0.8 g/100 g – but not more than 2.5 g salt in total per portion
<i>Dressings and sauces</i>	
32 Dressings of oil and vinegar. The products can have added flavourings.	– saturated fatty acids, not more than 20 % of fat content – sugars, not more than 5 g/100 g – salt, not more than 0,8 g/100 g
33 Sauces for main meals (ready products and products prepared according to the producer's instructions).	– fat, not more than 5 g/100 g – saturated fatty acids, not more than 33 % of fat content – sugars, not more than 5 g/100 g – salt, not more than 0,8 g/100 g The conditions apply to the ready-to-eat product.