



**NATIONAL AGENCY FOR FOOD AND DRUG ADMINISTRATION AND CONTROL
ACT (CAP N1 LFN,) 2004.**

**MARKETING OF FOODS AND NON-ALCOHOLIC BEVERAGES TO CHILDREN
REGULATIONS 2024**

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ARRANGEMENT OF SECTIONS

Commencement

1. Application
 2. Prohibition
 3. Principles for Marketing Communications of food and non-Alcoholic beverages
 4. Nutrient profile of Food High in Fat, Sugar, and Salt Products
 5. Nutrition and Health Claims
 6. Broadcast marketing communications
 7. Non-broadcast marketing communications
 8. Locations
 9. Offences and Penalties
 10. Forfeiture after conviction
 11. Interpretation
 12. Citation
- Schedules

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[]Commencement

In exercise of the powers conferred on the Governing Council of the National Agency for Food and Drug Administration and Control (NAFDAC) by Sections 5 and 30 of the NAFDAC Act Cap N1 LFN 2004 and Section 12 of the Food, Drugs and Related Products (Registration, Etc.) Act Cap F33 LFN 2004 and of all the powers enabling it in that behalf, **THE GOVERNING COUNCIL OF THE NATIONAL AGENCY FOR FOOD AND DRUG ADMINISTRATION AND CONTROL** with the approval of the Minister of Health hereby makes the following Regulations: -

1. Application:

These regulations shall apply to the marketing of foods and non-alcoholic beverages high in saturated fats, trans-fatty acids, sugars or salt as provided in schedule (1) to these regulations and as maybe prescribed by the Agency, targeted at children under 18 years of age and including the applicable extant Advertisement Regulations.

2. Prohibition

No person shall market foods and non-alcoholic beverages high in saturated fats, trans-fatty acids, sugars, and salt to children.

3. Principles for Marketing of food and non-alcoholic beverages

- a. Marketing of food and non alcoholic beverage products primarily targeted at children shall be responsible in the manner in which the food and beverage products are portrayed.
- b. Marketing of food and non-alcoholic beverage shall not.
 - i. Encourage or condone excessive consumption.
 - ii. Encourage an unhealthy lifestyle or unhealthy or unbalanced eating or drinking habits.
 - iii. Show people who choose a healthy active lifestyle in a negative manner.
 - iv. Mislead as to the nutritive value of any food or non-alcoholic beverages.
 - v. Mislead children as to the potential benefits from consumption of the product, either physically, socially, or psychologically.
 - vi. Disparage good dietary practice.
 - vii. Seem to urge children or parents or caregiver to buy excessive quantities of food for collection-based promotions.
 - viii. Aim to undermine the role of parents or caregivers in guiding diet and lifestyle choices.

4. Nutrient profile of Food High in Saturated fatty acid, Trans Fatty acid, Sugar, and Salt

- a. Categories of food and non-alcoholic beverage for the purpose of marketing restriction shall be in accordance with the nutrient profile model provided in schedule (1) to these regulations.
 - i. The nutrients thresholds for total fat, saturated fat, total sugars, added sugars, sodium and energy shall be as provided in schedule (1) to these regulations.

- ii. A food product based on the nutrient declaration panel shall not exceed (on a per 100 g/100ml basis) any of the relevant thresholds provided in the nutrient profile model for that food product category if marketing is to be permitted.
- iii. The quantities of nutrients in the food products should, where applicable, be calculated as sold or as reconstituted. Where a product needs to be reconstituted before it is eaten, the nutrient amounts should be calculated based on 100 g of the product as reconstituted according to the manufacturer's instructions.

5. Nutrition and Health Claims

- a. Nutrition and health claims made in marketing communications for food and non-alcoholic beverages targeted at children:
 - i. shall be accurate and not misleading.
 - ii. shall have a sound scientific basis and be conveyed in a manner that is consistent with the nature and scope of the evidence.
 - iii. shall be objective and clearly understandable.
- b. Comparative nutrition claims shall compare the composition of the food with a range of foods of the same category and the difference in the quantity of a nutrient and the energy value shall be stated.
- c. The following claims shall not be accepted in marketing communications for food products targeted at children:
 - i. Claims that state or imply health could be affected by not consuming a food.
 - ii. Claims that state or imply that a food prevents, treats or cures human disease.
 - iii. Health claims that refer to the recommendation of an individual health professional.
 - iv. References to changes in bodily functions that could give rise to, or exploit, fear in the audience.
 - v. Claims of a nutrition or health benefit that give rise to doubt about the safety or nutritional adequacy of another product.
 - vi. Health claims refer to a rate or amount of weight loss.
 - vii. Refer to health claims regulations for other nutrition and health claims.

6. Broadcast marketing

Broadcast marketing for food High in Fat, Salt and Sugar shall be subject to the following restrictions:

- a. The marketing of foods high in Fat, Salt and Sugar directed at children is prohibited on television, radio, online and other media.
- b. Promotional offers shall not be used in food high in Fat, Salt and Sugar advertisements targeted at children.
- c. Marketing communications for collection-based promotions or premiums shall not persuade children or their parents to buy excessive quantities of the product.
- d. Licensed characters and celebrities popular with children shall not be used in food high in Fat, Salt and Sugar advertisements targeted at children.

7. Non-broadcast marketing

Non-Broadcast Marketing of foods high in Fat, Salt and Sugar shall not be targeted at children under 18 years of age through the selection of non-broadcast media or the context in which they appear.

- a. No medium shall be used to advertise food High in Fat, Salt and Sugar targeted at children.
- b. Marketing communications, in non-broadcast media for food High in Fat, Salt and Sugar targeted at children shall not include;

- i. promotional offers or a competition
- ii. licensed characters or celebrities popular with children
- c. No sponsorship involving food High in Fat, Salt and Sugar shall be permitted for any other setting dedicated for use by children.
- d. No sponsorship involving food High in Fat, Salt and Sugar shall be permitted in events targeted at children.
- e. Marketing Communications for food High in Fat, Salt and Sugar in social media shall not be targeted at children.
- f. Notwithstanding regulation 7 subsection (a), products that are clearly produced for consumption on special occasions and are clearly special treats are exempted from these regulations.

8. Locations

Locations and settings primarily used by children shall be free from all forms of marketing for foods high in Fat, Salt and Sugar which shall include but not limited to; registered crèches, pre-schools, nurseries, family and child clinics, paediatric services, schools, dedicated school transport, playgrounds and youth centres.

9. Offences and Penalties

- a) Any person who contravenes any of the provisions of these Regulations commits an offence and shall be liable on conviction, in case of -
 - i. an individual, to imprisonment for a term not exceeding one year or to a fine not exceeding N800,000.00 or to both; and
 - ii. a body corporate, to a fine not exceeding N5,000, 000.00
- b) Where an offence under these Regulations is committed by a body corporate, firm or other association of individuals every –
 - i. director, manager, secretary or other similar officer of the body corporate;
 - ii. partner or officer of the firm;
 - iii. trustee of the body concerned;
 - iv. person concerned in the management of the affairs of the association; or
 - v. person who purports to act in a capacity referred to in paragraphs (a) to (d) of this sub-regulation,

is severally liable to be proceeded against and punished for that offence in the same manner as if he had himself committed the offence, unless he proves that the act or omission constituting the offence took place without his knowledge, consent or connivance.

10 Forfeiture after Conviction

- a) A person convicted of an offence under these Regulations shall forfeit to the Federal Government of Nigeria –
 - i. i. asset or property constituting proceeds derived from or obtained, directly or indirectly, as a result of the offence;
 - ii. ii. any of the person's property or instrument used in any manner to commit or to facilitate the commission of the offence
- b) In this regulation, "proceeds" means any property derived or obtained, directly or indirectly, through the commission of the offence.
- c) Enforcement of these Regulations, the Agency shall be responsible for the enforcement of these Regulations.

11. Interpretation

For the purpose of these regulations unless the context otherwise requires, the following terms shall mean

- a. **Agency** means the National Agency for Food and Drug Administration and Control;
- b. **Added sugars** are sugars added to foods and beverages by the manufacturer
- c. **Advertising:** The paid public presentation and promotion of ideas, goods, or services by a sponsor that is intended to bring a product to the attention of consumers through a variety of media channels such as broadcast and cable television, radio, print, billboards, the Internet, or personal contact.
- d. **Children:** In these regulations, the term “children” refers to persons aged above 3 to under 18 years.
- e. **Energy:** Total chemical energy available in food (in kilocalories) and its macronutrient constituents (carbohydrates, fats, and proteins).
- f. **Free sugars:** include monosaccharides and disaccharides added to foods and beverages by the manufacturer, cook or consumer, and sugars naturally present in food e.g honey, syrups, fruit juices and fruit juice concentrates.
- g. **Food** includes all food and non-alcoholic beverages.
- h. **Food high in Fat, Salt and Sugar Products** is a subcategory of food that is deemed high in fat, sugar and/or salt by the application of the Nutrient Profile model.
- i. **Health claim:** means any representation that states, suggests, or implies that a relationship exists between a food or a constituent of that food and health.
- j. **Marketing:** refers to any form of commercial communication of messages that are designed to, or has the effect of, increasing the recognition, appeal and/or consumption of particular products and services. It comprises anything that acts to advertise or otherwise promote a product or service.
- k. **A marketing communication** includes, but is not limited to, advertising, as well as other techniques such as promotions, sponsorships and direct marketing, and should be interpreted broadly to mean any form of communication produced directly by, or on behalf of, advertisers intended primarily to promote products, to influence the behaviour of and/or to inform those to whom it is addressed.
- l. **Nutrient profile model:** The evidence-based classification or ranking of foods according to their nutritional composition for reasons related to preventing disease and promoting health.
- m. **Non-Broadcast Media:** includes all forms of digital media, out of home media, print media and cinema.
- n. **Nutrition claim** means any representation which states, suggests or implies that a food has particular nutritional properties including but not limited to the energy value and to the content of protein, fat and carbohydrates, as well as the content of vitamins and minerals.
- o. **Saturated fat:** Fat molecules with no double bonds in between the carbon atoms. Saturated fat refers to the major saturated fatty acids in the diet, namely C14, C16 and C18, except in the case of milk and coconut oil where saturated fatty acids range from C4 to C18

- p. **Sodium:** A soft, silver-white element found in salt; 2.5 g of salt contains about 1 g of sodium.
- q. **Sponsorship:** Any form of monetary or in-kind contribution to any event, activity or individual with the aim, effect or likely effect of directly or indirectly promoting a product. Can include sponsorship of television and radio programmes, events, educational materials and equipment; programmes, including public-health campaigns and school breakfast or lunch programmes, venues; or sports teams.
- r. **Total sugars:** refers to all sugars from whatever source in a food and is defined as ‘all monosaccharides and disaccharides other than polyols.
- s. **Total fat:** The total fat content of a food product composed of fatty acids from the three main groups (saturated fatty acids, mono-unsaturated fatty acids, and poly-unsaturated fatty acids), which are differentiated based on their chemical formula and structure.
- t. **Trans-fat:** means all geometrical isomers of monounsaturated and polyunsaturated fatty acids having non-conjugated double bonds, interrupted by at least one methylene group, carbon-carbon double bond in the trans configuration. That is, fatty acids with at least one double carbon-carbon bond in the trans configuration.

12. Citation

These regulations shall be cited as Marketing of Foods and Non-alcoholic Beverages to Children

MADE at Abuja this.....day of 202...

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Chairman Governing Council

National Agency for Food and Drug Administration and Control (NAFDAC)

SCHEDULE 1

Nutrient profile Model for Food and Non-alcoholic beverage

Food Category		Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g					
				Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
1	Chocolate and sugar confectionery, energy bars, sweet topping, and desserts	Cocoa/Chocolate bars (including milk, dark and white chocolate) chocolate spread, imitations and chocolate substitutes, cereal, granola and muesli bars, table sugars, flour-based confectionaries, hard soft and chewy candy, chewing gum, caramels, soft jellied candies, marshmallow, sweet sauces, sweet desserts, creamy desserts, hard boiled sweets (such as lollipop)	5.1.1, 5.1.2 (except for products used to prepare chocolate milk or hot chocolate), 5.1.3, 5.1.4, 5.1.5, 5.2, 5.3, 5.4	8.0	No threshold provided	6.0	No threshold provided	No threshold provided	230
2	Cakes, sweet biscuits and pastries, other sweet bakery products, dry mixes for making such	Pastries; croissants, Cakes, cookies, pies, doughnuts, sweet rolls, muffins, macarons, breakfast biscuits (such as chocolate-covered biscuits), sweet pancake (ready-to-eat form), Buns with sweet fillings, Maandazi, chocolate pudding, plum pudding, bread pudding	7.2	8.0	No threshold provided	6.0	No threshold provided	0.25	230

3	Bread, bread products and crisp bread	Bread and rolls, crackers, mixes for making bread and ordinary bakery wares, mixes for making pizza, savoury pancake, wraps/tortillas, bread with raisins, buns, bread with cereal, rusks	7.1	8.0	No threshold provided	6.0	No threshold provided	0.25	No threshold provided
4	Breakfast cereals	Whole, broken or flaked grains of rice and other cereals, rice-based, wheat-based or maize-based breakfast cereals of all flavours, oatmeal, mueslis, rice cakes, porridge (dried, as	6.1, 6.3, 6.7	12.0	No threshold provided	9.0	No threshold provided	0.35	No threshold provided
5	Ready-to-eat savouries (savory snack foods)								
	(a) ready to eat savoury snacks Potato, cereal or starch-based (from roots, tuber, or legumes)	Popcorn, other snacks made from rice, maize, wheat, potato, cassava, plantain (i.e. chips, crisps)	15.1	8.0	No threshold provided	No threshold provided	0.0	0.25	230

Food Category	Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ⁹¹⁰					
			Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
(b) Processed nuts and edible seeds	Nuts, and mixed nuts (including with fruit content), edible seeds	15.2	No threshold provided	No threshold provided	No threshold provided	0.0	0.05	No threshold provided
(c) Fish-based	Fish-based snacks	15.3	No threshold provided	No threshold provided	6.0	No threshold provided	0.25	230
6 Beverages								
(a) Juices	100% fruit and vegetable juices prepared from fresh or reconstituted from concentrate, smoothies	14.1.2, 14.1.3	No threshold provided	No threshold provided	6.0	0	0.30	No threshold provided
(b) Milk and dairy based drinks	Milks and sweetened milks, reconstituted powdered milk, flavoured dairy products a, sour milk, fermented dairy-based products (chocolate milk, strawberry milk, cocoa, drinking yoghurt), condensed milk, milk shakes, sweetened creamer. <i>Milk means milk from animals such as cows, goats, camels etc.</i>	1.1	4.0 ¹⁸	No threshold provided	No threshold provided	0.0	No threshold provided	No threshold provided
(c) Water-based flavoured and unflavoured drink	Sport, energy drinks ¹⁹ , electrolyte drinks, carbonated and non-carbonated water-based flavoured drinks (i.e. soft drinks), powdered juices, concentrates (liquid or solid) calculated as or in ready-to-drink form, flavoured waters (sparkling), reconstituted chocolate or malted powdered drinks, syrups, sugar cane juices	14.1.4	No threshold provided	No threshold provided	0.0	No threshold provided	0.1	No threshold provided

	(d) Coffee, coffee substitutes, tea, herbal infusions	Coffee, including instant and premixed coffee, coffee substitute, tea including instant and premixed tea, herbal infusion to be prepared or in ready-to-drink form	14.1.5	No threshold provided	No threshold provided	0.0	No threshold provided	No threshold provided	No threshold provided
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Food Category	Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ⁹¹⁰						
			Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²	
	(e) Cereal, legumes, grain, tree nut-based beverages	Cereal, grain and tree nut-based beverages produced from the extracts of cereals, pulses and tree nuts (e.g. rice-, almond-, soya, oat-based beverages).	14.1.5, 6.8.1	No threshold provided	No threshold provided	6.0	0.0 ²⁰	0.1	No threshold provided
7	Frozen dairy-based desserts and edible ices	Ice cream, ice milk, frozen yoghurt, ice lollies and sorbets	1.7, 3	6.0	No threshold provided	12.0	No threshold	0.10	230
8	Other dairy based desserts	Dairy based products that have been curdled by fermentation, acid, enzyme, heat, etc. and flavoured with sugar and other ingredients. Examples are flavoured cream- type yoghurt, jellied milk, butterscotch, chocolate mousse, puddings (including rice pudding, milk pudding), flan, custard	1.7	4.0	No threshold provided	6.0	No threshold provided	0.10	230
9	Cheese and analogues	Unripe or ripened cheese, processed cheese, cheese analogues, that can be classified based on physical characteristics as hard (e.g. Parmesan), semi-hard (e.g. cheddar, edam), semi-soft and soft (e.g. mozzarella, ricotta) as well as serving style	1.6	20.0	No threshold provided	No threshold provided	0.0	0.60	No threshold provided

		as sliced cheese, cream cheeses, grated or powdered cheeses, spreadable cheeses, cottage cheese, processed cheese							
10	Composite foods (Prepared foods, ready-made and convenience foods and composite dishes)	Mixtures of multiple components (e.g. meat, sauce, grain, cheese, vegetables). These include foods that require minimal preparation (heating, thawing, rehydrating) or the ready-to-serve meal from restaurants. Examples: frozen and chilled ready meals, pizzas, lasagna, ready-made sandwiches, soups, burgers in buns, ready meals, soups, tinned spaghetti, baked bean, filled pastas, French fries	16, 12.5.1, 12.5.2	12.0	3.5	9.0	No threshold provided	0.35	No threshold provided
11	Butter and other fats and oils, and fat emulsions	Vegetable oils and fats, lard, ghee, fish oils and other animal fats, butter, margarine and similar products. Examples: cooking oils from plant and animal sources, fat blends, nuts spread (e.g. peanut butter)	2.1, 2.2	No threshold provided	35.0	No threshold provided	0.0	0.10	No threshold provided
12	Pasta and noodles and like products, rice and grains	Fresh, precooked, or dried noodles and pastas and like products, rice paper, rice noodles, vermicelli made from wheat, tapioca, sago, brick paper etc. (sold as ready-to-eat)	6.4	3.0	No threshold provided	No threshold provided	0.0	0.25	No threshold provided

Food Category	Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ⁹¹⁰						
			Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²	
13	Fresh and frozen meat, poultry, game, fish and seafood	Fresh and frozen meat, poultry, game, molluscs, crustaceans, echinoderms in the forms of whole pieces, cuts/fillet, comminuted/minced/creamed. Examples: beef, pork, chicken, lamb, goat, tuna, mackerel, catfish, shrimp, ox tails, Turkey tails, mutton flap, organ meats, eggs, oily fish (e.g. herring) etc.	8.1, 8.2.3, 9.1, 9.2.1, 9.2.3	15.0	No threshold provided	No threshold provided	No threshold provided	No threshold provided	No threshold provided
14	Processed meat, poultry, game, fish and fish products								
	(a) Processed meat, poultry and game products	Non-heat and heat treated whole pieces or cuts or commuted meat, poultry and game that have been cured and dried or fermented. Examples: smoked ham, salted dried meat, salami, sausage, bacon, corned beef, smoked duck, canned meats, chicken nuggets, beef or chicken patty, pork rind, liver pate	8.2.1, 8.2.2, 8.3.1, 8.3.2	8.0	3.0	No threshold provided	No threshold provided	0.40	No threshold provided
	(b) Processed fish and seafood products	Frozen battered, cooked and/or fried, smoked, dried, fermented, and/or salted, semi-preserved by pickling or brining, fully-preserved by canning or fermentation of fish and sea foods. Examples: salted fish and seafood, brined fish, salted fish in oil, fermented fish and seafood, anchovies, shrimp paste, canned tuna, sardine, or mackerel, smoked fishes, dried shrimp, fish balls, fish finger, fish burger	9.2.2, 9.2.4, 9.3, 9.4	8.0	3.0	No threshold provided	No threshold provided	0.40	No threshold provided

15	Fresh and frozen fruits and vegetables, legumes, roots and tubers	Fruits, vegetables, mushrooms, roots and tubers, pulses and legumes, seaweed, fresh coconut	4.1.1, 4.1.2.1, 4.2.1, 4.2.2.1	Permitted
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	Food Category	Examples of food items	Codex Food Category code	Marketing prohibited if thresholds exceed values per 100 g ⁹¹⁰					
				Total fat (g)	Saturated fat (g)	Total sugars (g)	Added sugars (g) ¹¹	Sodium (g)	Energy (kcal) ¹²
16	Processed fruits, vegetables, and legumes	<p>Dried fruits²², canned or bottled, jam, jellies, marmalades, packed in vinegar, oil or brine; pickled, candied, pulp, purees, topping, fermented, fillings, cooked forms of fruits and vegetables.</p> <p>Examples: fruits and vegetables in vinegar, oil or brine, dried coconut, coconut cream, marmalade, jams, canned fruits, vegetables and legumes, dried mushrooms, preserved or pickled fruits and vegetables, fermented vegetables</p>	4.1.2, 4.2.2	5.0	No threshold provided	No threshold provided	0.0	0.40	No threshold provided

17	Solid-form soybean products	Soybean-based products, soybean curd (tofu), semi- dehydrated tofu, dehydrated tofu (kori tofu), fermented soybeans (natto), other soybean protein products (soya nuggets and textured vegetable protein)	6.8.2, 6.8.3, 6.8.4, 6.8.5, 6.8.6, 6.8.7, 6.8.8, 12.9.1	8.0	No threshold provided	No threshold provided	0.0	0.10	No threshold provided
18	Sauces, dips, other seasonings and dressings	Emulsified, non-emulsified mixes as concentrated, clear sauces and like products, soybean-based seasoning and condiments. Examples: mayonnaise, salad dressing, onion dips, tomato ketchup, gravy, cheese sauce, cream sauce, bouillon cubes, seasoning powder, fermented and unfermented soy sauces, fish sauce, sweet chili sauce, spaghetti sauce, BBQ sauces,	12.6, 12.9.2	8.0	No threshold provided	No threshold provided	0.0	0.30	No threshold provided

Schedule 1B

EXPLANATION OF THE NUTRIENT THRESHOLD

FOOD CATEGORY	EXAMPLES OF FOOD ITEMS	RATIONALE
<p>1.</p>	<p>Chocolate and sugar confectionery, energy bars, sweet topping and deserts</p>	<p>Cocoa/Chocolate bars (including milk, dark and white chocolate) chocolate spread, imitations and chocolate substitutes, cereal, granola and muesli bars, table sugars, flour-based confectionaries, hard soft and chewy candy, chewing gum, caramels, soft jellied candies, marshmallow, Sweets sauces, sweet dessert, creamy desserts, hard boiled sweets (such as lollipop)</p> <p>Most confectionary items cannot be produced without the use of high amounts of sugar or non-sugar sweetener. On a 2000 kcal diet, based on the assumption that one snack would contribute 11.5% of total energy intake/day, the energy contribution from a snack is approximately 230 kcal or less. Thus, 230 kcal or more per 100g snack could be classified as an energy-dense snack. Therefore, and used for calculation of thresholds for fat and sugar.</p> <p>The thresholds for fat and sugars are set based on WHO/FAO population nutrient intake goals that fats and simple sugars should contribute to 30% and 10% of total energy, respectively.</p> <p>Sample calculation: Energy contribution from 30% fat = $230 \times 30 / 100 = 69$ kcal. Conversion to grams = $69 / 9 = 7.6$g/100 g.</p> <p>Energy contribution from 10% sugar = $230 \times 10 / 100 = 23$ kcal. Conversion to grams = $23 / 4 = 5.7$g/100g. All thresholds have been rounded up to the nearest whole number to allow for minor variation in product categories.</p>

2.	Cakes, sweet biscuits and pastries, other sweet bakery products, dry mixes for making such	Pastries; croissants, cakes, cookies, pies, doughnuts, sweet rolls, muffins, macarons, breakfast biscuits (such as chocolate-covered biscuits), sweet pancake (ready-to-eat form), buns with sweet fillings, <i>maandazi</i> , chocolate pudding, plum pudding, bread pudding	<p>Most fine bakery wares cannot be produced without the use of high amounts of sugar or non- sugar sweetener.</p> <p>On a 2000 kcal diet, based on the assumption that one snack would contribute 11.5% of total energy intake/day, the energy contribution from a snack is approximately 230 kcal or less.</p> <p>Thus, 230 kcal or more /per 100g snack could be classified as an energy-dense snack. Therefore, 230 kcal/100 kcal is set as the energy threshold and used for calculation of thresholds for fat and sugar.</p> <p>For fat and sugars, thresholds are based on WHO/FAO population nutrient intake goals that fats and simple sugars should contribute to 30% and 10% of total energy, respectively.</p> <p>Sodium intake is calculated as 1 mg/1 kcal, or lower (based on the recommendation of 2000 mg /2000 kcal).</p> <p>All thresholds have been rounded up to the nearest round number or 2 decimal places (sodium) to allow for minor variation in product categories.</p>
3.	Bread, bread products and crisp bread	Bread and rolls, crackers, mixes for making bread and ordinary bakery wares, mixes for making pizza, savoury pancake, rotis, wraps/tortillas, bread with raisins, buns, bread with cereal, rusks	<p>On average, energy from bread, a staple food is 250 kcal/100g. (USDA Food Composition Databases, https://ndb.nal.usda.gov).</p> <p>Fat and sugars thresholds are based on WHO/FAO population nutrient intake goals that fat and simple sugars should contribute 30% and 10% of total energy, respectively (sugar content is also adequate for yeast leavened products).</p> <p>For sodium, the recommendation is 1 mg/1 kcal (based on 2000 mg per 2000 kcal). All thresholds have been rounded up to the nearest round number or 2 decimal places (sodium) to allow for minor variation in product categories.</p>

4.	Breakfast cereals	Whole, broken or flaked grains of rice and other cereals, rice-based, wheat-based or maize-based breakfast cereals of all flavours, oat meal, mueslis, rice cakes, porridge (dried, as sold)	<p>The thresholds for cereals are based on average energy levels in commercial breakfast cereals, which are approximately 350 kcal/100 g. (https://ndb.nal.usda.gov/ndb/search/list).</p> <p>Sodium is limited at 1 mg/1 kcal (based on 2 000 mg/2 000 kcal), providing a threshold of 350 mg sodium.</p> <p>Fat and sugar contents are based on WHO/FAO population nutrient intake goals that fats and simple sugars should contribute 30% and 10% of total energy, respectively. Therefore, fat and sugar thresholds are 11.6 and 8.8 g, respectively and have been rounded up to the nearest round number to allow for minor variation in product categories.</p>
5.	Ready-to-eat savouries (savory snack foods)		
	(a) ready to eat savoury snacks potato, cereal or starch-based (from roots, tuber, or legumes)	Popcorn and maize corn, other snacks made from rice, maize, wheat, potato, cassava, plantain (i.e. chips, crisps)	<p>The average energy content of most snacks of this type is 200-300 kcal/100 g. On a 2000 kcal diet, based on the assumption that one snack would contribute 11.5% of total energy intake/ day, the energy contribution from a snack is approximately 230 kcal or less. Thus, 230 kcal or more /per 100g snack could be classified as an energy dense snack. Therefore, 230 kcal/100 kcal is set as a threshold for energy and used for calculation of thresholds for fat and sugar. Fat and sugar thresholds are based on WHO/FAO population nutrient intake goals that fats and simple sugars should contribute 30% and 10% of total energy, respectively.</p> <p>Sodium content should be limited to 230 mg/100 g (1 mg/1 kcal), which is feasible since the sodium contents in these products is usually in the range of 100-1800 mg/100 g. (USDA Food Composition Databases, https://ndb.nal.usda.gov).</p> <p>All thresholds have been rounded up to the nearest round number or 2 decimal places (sodium) to allow for minor variation in product categories.</p>

	(b) Processed nuts and edible seeds	Nuts, and mixed nuts (including with fruit content), edible seeds	The sodium threshold indicated is for unsalted nuts and accounts for the natural sodium in different varieties of nuts (USDA Food Composition Databases, https://ndb.nal.usda.gov). No limit is given for total fat since fat content varies significantly between kinds of nuts and nuts contain healthy fats. This criterion aims for nuts that are not deep fried.
	(c) Fish-based	fish-based snacks	<p>On a 2000 kcal diet, based on the assumption that one snack would contribute 11.5% of total energy intake/day, the energy contribution from a snack is approximately 230 kcal or less. Thus, 230 kcal or more /per 100g snack could be classified as an energy- dense snack. Therefore, 230 kcal/100 kcal is set as a threshold for energy and also used for calculation of thresholds for fat and sugar. Sugar threshold is based on WHO guideline that simple sugars should contribute 10% of total energy.</p> <p>Fish based snacks contain protein (range from 10-60 g/100g) and are low in fat, however they may contain high sodium and sugar. Salt is added in the process of making a protein gel and flavouring and therefore, sodium content ranges from 1600- 2700mg/100g. (Kasetsart J. (Nat. Sci.) 33 : 270–276 (1999). Nutrient Contents of Commercial Snack Food Products http://kasetstjournal.ku.ac.th/kuj_files/2008/A0804281507410760.pdf .)</p> <p>This product could be reformulated for a better nutrition profile by using minimum salt and sugar as necessary for processing and flavouring. Sodium threshold is set as 1 mg:1 kcal.</p>
6.	Beverages		

	(a) Juices	100% fruit and vegetable juices prepared from fresh or reconstituted from the concentrate, smoothies	<p>WHO guidelines recommend limiting intake of all sources of free sugars, i.e. sugars naturally presented in honey, syrups, fruit juices, which may also contribute to excess energy intake.</p> <p>WHO recommendation on free sugars consumption is 10% of total energy intake and the desirable recommendation is to reduce to 5%. Most 100% fruit juices contain sugar of 10–14 g/100 g.</p> <p>By mixing fruit with vegetable juice, the sugar content can be reduced. Coconut water contains approximately 6g/100 g and therefore, the threshold for sugars is set at 6g/100g.</p> <p>As some vegetable juices are made by adding some sodium, the threshold is set at 0.30 g/100g to restrict those products with added sodium.</p>
	(b) Milk and dairy based drinks	<p>Milks and sweetened milks, butter milk, reconstituted powdered milk, flavoured dairy-based milk, sour milk, fermented dairy-based milk e.g. chocolate milk, strawberry milk, cocoa, drinking yoghurt, condensed milk, milk shakes, sweetened creamer, evaporated milk.</p> <p>Milk means milk from animals such as cows, goats, camels, etc.</p>	<p>The USDA's standards for whole milk state that the milk must have at least 3.25 per cent milk fat. Most milk consumed in Africa comes from cows, goats or camels.</p> <p>According to FAO, fat constitutes approximately 3 to 4 per cent of the solid content of cow's milk (http://www.fao.org/dairy-production-products/products/milk-composition/en/). Therefore, the threshold of total fat is set at 4.0 based on the fat content of whole cow milk.</p>

	(c) Water-based flavoured and unflavoured drink	Sport, energy drink, electrolyte drinks, carbonated and non-carbonated water-based flavoured drink (i.e. soft drinks), juice drinks, powdered juices, concentrates (liquid or solid) in or calculated as ready-to-drink form bottled water, flavoured waters (aerated), reconstituted chocolate or malted powdered drinks, syrups, sugar cane juices	<p>This category includes all soft drinks. The total sugar threshold was set at 0 to discourage any form of advertisement to children of all kinds of beverages containing added sugar.</p> <p>Concentrations of sodium in potable water are typically less than 20 mg/l but can greatly exceed this in some countries. No firm conclusions can be drawn concerning the possible association between sodium in drinking-water and the occurrence of hypertension. Therefore, no health-based guideline value is proposed. However, concentrations in excess of 200 mg/l may give rise to unacceptable taste (http://www.who.int/water_sanitation_health/water-quality/guidelines/chemicals/sodium-fs-new.pdf?ua=1).</p> <p>Therefore, the salt threshold was set at 0.1g/100g of product so as not to permit the marketing of beverage containing sodium beyond the authorized composition in drinking water.</p>
	(d) Coffee, coffee substitutes, tea, herbal infusions	Coffee including instant and premixed coffee, coffee substitute, tea including instant and premixed tea, herbal infusion in or calculated as ready-to-drink form	A threshold of 0g for total sugar/100g product (like water-based flavoured and unflavoured drink) has been set to discourage any form of advertisement to children of all kinds of beverages containing added sugar.
	(e) Cereal, legumes, grain, tree nut-based beverages	Cereal, grain and tree nut-based beverages produced from the extracts of cereals, beans, pulses and tree nuts e.g. rice-, almond-, soya, oat- based beverages.	<p>Cereal, grain and tree nut-based beverages consist of water and sugar as well as protein and starch. The limitation is on sugar, which is allowed to be higher than in flavoured drinks in order to make it palatable. Therefore, the same threshold used for juices is used for these beverages. However, to limit the products with added sugars, an additional threshold was set at 0.0g for added sugars.</p> <p>The sodium content is limited based on what are usually found in soya beverage and soya milk (40-54 mg /100ml). The sodium thresholds have been rounded up to be consistent with the “Water-based flavoured and unflavoured” drinks.</p>

7.	Frozen dairy-based desserts and edible ices	Ice cream, ice milk, frozen yoghurt, ice lollies and sorbets.	<p>On a 2000 kcal diet, based on the assumption that one snack would contribute 11.5% of total energy intake/day, the energy contribution from a snack is approximately 230 kcal or less. Thus, 230 kcal or more per 100g snack could be classified as an energy dense snack. Therefore, 230 kcal/100 kcal is set as a threshold for energy and also used for calculation of thresholds for fat and sugar. Fat and sugar thresholds are based on WHO/FAO population nutrient intake goals that fats and simple sugars should contribute to 30% and 10% of total energy, respectively.</p> <p>A wide range of fat content was found in these groups of products during the pilot test (range 2.6-19 g/100 g). We set the threshold for total fat at 6.0 g fat/100g to be consistent with the confectionery category and general justification for snacks.</p> <p>According to calculations, sugar threshold should be at 6g/100g; however 12 g/100 g is used since low sugar creates a non-biteable hard ice crystal (icecreamsience.com/sugar-in-ice-cream). This level of sugar is like natural fruit juice and should also provide an acceptable taste similar to a sorbet. Sodium content is</p>
			<p>based on what is generally found in manufactured products. Sodium intake is calculated as lower than 1mg/1 kcal (USDA Food Composition Databases, https://ndb.nal.usda.gov).</p>

8.	Other dairy based desserts	<p>Dairy-based products that have been curdled by fermentation, acid, enzyme, heat, etc. and flavoured with sugar and other ingredients.</p> <p>Examples are flavoured cream-type yoghurt, jellied milk, butterscotch, chocolate mousse, puddings (including rice pudding, milk pudding), flan, custard</p>	<p>On a 2000 kcal diet, based on the assumption that one snack would contribute 11.5% of total energy intake/day, the energy contribution from a snack is approximately 230 kcal or less. Thus, 230 kcal or more /per 100g snack could be classified as an energy- dense snack. Therefore, 230 kcal/100 kcal is set as a threshold for energy and also used for calculation of thresholds for fat and sugar. The thresholds are based on WHO/FAO population nutrient intake goals that fats and simple sugars should contribute to 30% and 10% of total energy, respectively. Sodium is calculated as 1 kcal :1 mg or lower.</p> <p>These products are good sources of protein and energy. Total sugar is limited at 6 g/100g based on WHO/FAO population nutrient intake goals that simple sugars should contribute 10% of total energy.</p> <p>The fat threshold is set at 4.0 to consider the use of whole cow milk and is set at a similar level as for milk and dairy based drinks. Sodium content is based on what is generally found (USDA Food Composition Databases, https://ndb.nal.usda.gov). Thresholds have been rounded up to allow for minor variation in product categories.</p>
9.	Cheese and analogues	<p>Unripened or ripened cheese, processed cheese, cheese analogues, that can be classified based on physical characteristics as hard (e.g. Parmesan), semi-hard (e.g. cheddar), medium-hard (e.g. edam), semi-soft and soft (e.g. mozzarella, ricotta) as well as serving style as sliced cheese, cream cheeses, grated or powdered cheeses, spreadable cheeses, cottage cheese, processed cheese</p>	<p>Cheese is a good source of protein and calcium. The kind with lower moisture content (hard cheeses) normally contains more protein and calcium as well as fat and sodium. Salt is required in production step especially water removal such as cheddaring. The fat content allowed is for semi-hard cheese that is generally consumed, and sodium content is allowed at the technical feasible level for production.</p>

10.	Composite foods (Prepared foods, ready-made and convenience foods and composite dishes)	Mixtures of multiple components (e.g. meat, sauce, grain, cheese, vegetables). These include foods that require minimal preparation (heating, thawing, rehydrating) or the ready-to-serve meal from restaurants. Examples: frozen and chilled ready meals, pizzas, lasagna, ready-made sandwiches, soups, burgers in buns, ready meals, soups, tinned spaghetti, baked bean, filled pastas, French fries	The thresholds have been calculated as per 350kcal/100g since most available products are estimated to contain an energy range of approximately 250-450 kcal/100g (average 350kcal). As recommended in WHO/FAO population nutrient intake goals fat, saturated fat and sugar should contribute to 30% and 10% respectively. Thresholds are calculated as 11.6g (rounded to 12g), 3.5g and 8.8g (rounded to 9 g). Sodium threshold is set at 1mg/1 kcal (350mg). Thresholds have been rounded up to allow for minor variation in product categories.
11.	Butter and other fats and oils, and fat emulsions	Vegetable oils and fats, lard, ghee, fish oils and other animal fats, butter, margarine and similar products. Examples: cooking oils from plant and animal sources, fat blends, nuts spread (e.g. peanut butter)	Fat and oil are good sources of energy. The concern relates to the quality of fat, especially the ratio of saturated fat which should not be more than 1/3 of consumed fat or oil. As mentioned in the population nutrient intakes, total energy contribution from fat and saturated fat should be less than 30% and 10%, respectively, of which saturated fat should be 1/3 of the total fat (weight for weight). A threshold was added for added sugar set at 0.0 to not allow sweetening in the making of these food products. Sodium threshold is set as the lower range of sodium in manufactured products (USDA Food Composition Databases, https://ndb.nal.usda.gov).

12.	Pasta and noodles and like products, rice and grains	Fresh, precooked, or dried noodles and pastas and like products, rice paper, rice noodles, vermicelli made from wheat, tapioca, sago, brick paper etc. (cooked as ready to eat)	<p>These products are normally consumed as a staple, which should contribute 25% of total energy intake or 500 kcal on a 2000 kcal diet. The energy content in such products is approximately 250 kcal/100g.</p> <p>Since pastas and noodles are usually consumed in combination with other foods as a meal, it is assumed that half the energy (250 kcal) is from 100 g of pasta/noodle, and the other half would be possibly from a sauce, vegetable or meat preparation which would also contribute sodium to the meal.</p> <p>Pastas and noodle-like products mainly consist of starch, but the pre-cooking process may also include deep-frying where the fat content can be as high as 20g fat/100g product. Therefore, the fat threshold is set to discourage production/marketing of deep-fried products.</p> <p>The threshold for added sugar is set at 0.0 g added sugar/100g product to also discourage production/marketing of products with added sugar.</p> <p>The threshold for sodium from pasta is limited at about 250 mg /100 g (1 mg of sodium: 1 kcal) and rounded up.</p>
13.	Fresh and frozen meat, poultry, game, fish and seafood	<p>Fresh and frozen meat, poultry, game, molluscs, crustaceans, echinoderms in the forms of whole pieces, cuts/fillet, comminuted/ minced/creamed.</p> <p>Examples: beef, pork, chicken, lamb, goat, tuna, mackerel, catfish, shrimp, ox tails, Turkey tails, mutton flap, organ meats, eggs, oily fish (e.g. herring) etc.</p>	<p>Animal meat is a source of good quality protein for children. However, some parts have a high fat content which should be avoided. Lean meat and chicken can contain up to 15g fat and therefore, this limit has been set (USDA Food Composition Databases, https://ndb.nal.usda.gov).</p>
14.	Processed meat, poultry, game, fish and fish products		

	(a) Processed meat, poultry and game products	<p>Non-heat and heat-treated whole pieces or cuts or comminuted meat poultry and game that have been cured and dried or fermented.</p> <p>Examples: smoked ham, salted dried meat, salami, sausage, bacon, corned beef, smoked duck, canned meats, chicken nuggets, beef or chicken patty, pork rind, liver pate</p>	<p>Cured meat products are also sources of protein and fat and used in situations where fresh meats may be unavailable. Some products however contain high fat, especially saturated fat (from added animal fat) as well as sodium from salt that is used for processing and flavouring.</p> <p>Fat is normally added to provide soft and chewy texture to meats such as sausages and sodium chloride is necessary for the flavouring and salting-in process of meat protein that acts as an emulsifier or binder. It is feasible to produce processed meat with a lower fat and sodium content and the thresholds are set considering manufactured products with the lower range of fat and sodium values (USDA Food Composition Databases, https://ndb.nal.usda.gov). The threshold for sodium is consistent with the data from the pilot test (the average in this category was 0.7 g / 100 g of product).</p> <p>The threshold for saturated fat is set at 3.0 to limit saturated fat to 1/3 of total fat and to be consistent with the “Processed fish and seafood” category.</p>
	(b) Processed fish and seafood products	<p>Frozen battered, cooked and/or fried, smoked, dried, fermented, and/or salted, semi-preserved by pickling or brining, fully-preserved by canning or fermentation of fish and sea foods.</p> <p>Examples: salted fish and seafood, brined fish, salted fish in oil, fermented fish and seafood, anchovies, shrimp paste, canned</p>	<p>Fish and seafood are locally available in many parts of the Region and are preserved locally by using salt or by canning, battering, or frying. Some forms of preservation can cause overconsumption of saturated fat and salt. The fat content is limited to 8 g/100g, as found in the drained canned tuna in oil (USDA Food Composition Databases, https://ndb.nal.usda.gov). Saturated fat is limited to 1/3 of total fat. Sodium content can be from salt added for both processing and flavouring, it is therefore reduced from usual levels of 900-1000 mg (https://www.caloriecount.com/calories-white-fish-ball-i132121) to 400 mg/100 g.</p>
		tuna, sardine, or mackerel, smoked fishes, dried shrimp, fish balls, fish finger, fish burger	

15.	Fresh and frozen fruits and vegetables, and legumes	Fruits, vegetables, mushrooms, roots and tubers, pulses and legumes, nuts and seeds, seaweed, fresh coconut	Fresh fruits and vegetables are sources of dietary fibre, vitamins and minerals and increased consumption should be encouraged.
16.	Processed fruits, vegetables and legumes	<p>Dried fruits, canned or bottled, jam, jellies, marmalades, packed in vinegar, oil or brine, pickles, candied, pulp, purees, topping, fermented, fillings, cooked forms of fruits and vegetables.</p> <p>Examples: fruits and vegetables in vinegar, oil or brine, dried coconut, coconut cream, marmalade, jams, canned fruits, vegetables and legumes, dried mushrooms, preserved or pickled fruits and vegetables, fermented vegetables</p>	<p>Processing of fruits and vegetables aims to preserve fruits and vegetables for a longer shelf life. However, processing tends to change the natural nutrient content due to concentration or addition of sugar or sodium. Pickled fruits and vegetables should not be promoted in children.</p> <p>If pickling is done as a means of preservation, minimum sodium should be used. Dried fruits and vegetables with no sugar and salt added can be promoted in children during off-seasons since about 50 grams of dried fruits and vegetables can be equal to 600 g of fresh fruits and vegetables. Calculation: Based on the assumption that fresh fruits and vegetables have a moisture content of approximately 93% and 7% of solids, and dried fruits and vegetables have a moisture content of approximately 10% and 90% of solids, 50 g of dried fruits and vegetables = $0.93 \times 50 \text{ g} / 0.07$ = would be approximately equivalent in weight and volume to 664 g of fresh fruit or vegetable approximately.</p> <p>Some foods products are often prepared with fats. Accordingly, it was considered important to set a threshold for total fat in this category to restrict products with high fats. The value of 5g total fat/100g product was based on the estimated average of food products found for this category in the African Region during the pilot test (average of 4.5), and we rounded to 5.0 which is consistent with the threshold from the WHO European Region model.</p>

17.	Solid-form soybean products	Soybean-based products, soybean curd (tofu), semi-dehydrated tofu, dehydrated tofu (kori tofu), fermented soybeans (natto), other soybean protein products (soya nuggets and textured vegetable protein)	<p>Soybean is a good source of protein, calcium and polyunsaturated fatty acids. Different solid forms of soybean products are consumed in Africa.</p> <p>The fat threshold is set at 8g/100g based on the average fat content in food products in this category found during the pilot test in the Region, which was approximately 6.5%. We rounded to set threshold at 8g total fat/100g product to be consistent with processed meat category.</p> <p>The threshold of added sugar is set at 0.0g added sugar/100g product to not allow the marketing of products with added sugar. This is consistent with the WPR model.</p>
18.	Sauces, dips, other seasonings and dressings	<p>Emulsified, non-emulsified mixes as concentrated, clear sauces and like products, soybean-based seasoning and condiments.</p> <p>Examples: mayonnaise, salad dressing, onion dips, tomato ketchup, gravy, cheese sauce, cream sauce, bouillon cubes, seasoning powder, fermented and unfermented soy sauces, fish sauce, sweet chili sauce, spaghetti sauce, BBQ sauces, chili paste, mustard sauce, mustard flour, harissa</p>	<p>These products are usually eaten in small portion sizes of 10g-30 g. In 100g of product, the content of sodium is approximately 400-20 000 mg/100g, fat content ranges from 0.1g-80g/100g fat, and sugar content is 0.2-73/100g, according to the pilot test data.</p> <p>For sodium, a limit of 350 mg, the lower threshold found in tomato sauce is set, which would make only a small contribution to sodium intake, considering the small portion size consumed.</p> <p>For fat, a threshold of 8g/100g is set to be consistent with “Processed fish and seafood products” and “Processed meat, poultry and game products” categories.</p> <p>For sugar, a threshold of 0.0g added sugar/100g product is set to discourage adding too much sugar in these products.</p>

