

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, phytostanols and phytostanol 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, phytostanols or phytostanol 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



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	 added fat not more than 3 g/100 g 	
(except peanuts) and potatoes. The products	 added fat cannot contain more than 20 % 	
can be processed.	saturated fatty acids	
	 added sugars, not more than 1 g/100 g 	
Unprocessed herbs are also covered.	– salt, not more than 0.5 g/100 g	
2 Unprocessed fruits and berries. The		



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



11 a) Milk and fermented dairy products intended for drinking, without added flavourings.	– fat, not more than 0,7 g/100 g
Corresponding lactose-free products and lactose-free milk drink are also covered.	
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.	– fat, not more than 1,5 g/100 g
Corresponding lactose-free products are also covered.	
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.	 fat, not more than 1,5 g/100 g added sugars, not more than 4 g/100 g
Corresponding lactose-free products are also covered.	
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.	– fat, not more than 5 g/100 g
Corresponding lactose-free products are also covered.	
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.	 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
Corresponding lactose-free products are also covered.	• · · · · · · · · · · · · · · · · · · ·
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 %



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



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 than10 % 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 stat	ed cannot add fat to the product.	
24 a) Raw products of whole or sliced meat	– fat, not more than 10 g/100g	
pieces which are surface-marinated or spiced.	 sugars, not more than 3 g/100g salt, not more than 1,0 g/100 g 	
- for injection salted products, nevertheless	– salt, not more than 0,5 g/100 g	
24 b) Raw or ready-to-eat products in which	– fat, not more than 10 g/100 g	
ground/minced meat is the main ingredient.	 – sugars, not more than 3 g/100g 	
	– salt, not more than 1.7 g/100 g	
- for sausages, nevertheless	– salt, not more than 2,0 g/100 g	
- for sliced sausages, nevertheless	- salt, not more than 2.2 g/100 g	
- for beef mince, nevertheless	– salt, not more than 1,0 g/100 g	
24 c) Ready-to-eat or smoked products in	– fat, not more than 10 g/100 g	
which the main ingredient is whole or	– sugars, not more than 3 g/100g	
unsliced meat, and which is not covered by group 24 b).	– salt, not more than 2,0 g/100 g	
- for sliced products, nevertheless	- 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.	 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 	
The products can contain sauce or brine.	 sugars, not more than 3 g/100 g salt, not more than 1,0 g/100 g 	
The percentages and conditions apply to that part of the product intended for consumption.	Suit, not more than 1,0 g/100 g	
They can be breaded, but the preparation stated cannot add fat to the product.		
Ready meals etc.		
26 Ready meals that are intended to be a	- not more than 33 % of the energy content	
complete meal with proteins, carbohydrates	can come from fat	
and vegetables, fruit or berries, and that are not covered by groups 27, 28, 29, 30 or 31.	 in products that contain fish with more than 10 % fat, energy content from fat can be not more than 40 %. 	
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	 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 	



vegetables, or fruit and berries per 100 g	portion
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.	
27 Pirogues, pizzas and other pies than	 not more than 33% of the energy content
dessert pies, based on cereals and that contain:	can come from fat – in products that contain fish with more than 10% fat, energy content from fat can be
 not less than 250 kcal (1050 kJ) per stated portion, and not less than28 g vegetables (except potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g product. 	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
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.	
28 Open sandwiches, baguettes, wraps and similar products, based on cereals and that contain:	 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 less than150 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. 	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
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.	
29 Soups with fish or meat (ready-to-eat products and products prepared according to the producer's instructions) that contain:	 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
 not less than100 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. 	 added sugars, not more than 3 g/100 g 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.
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.	
30 Soups with no fish or meat (ready-to-eat	– not more than 33 % of the energy content
products and products prepared according to	can come from fat
the producer's instructions) that contain:	– added sugars, not more than 3 g/100 g
	– salt, not more than 0.8 g/100 g
– not less than100 kcal (420 kJ) per stated	– but not more than 2.5 g salt in total per
portion, and	portion.
- 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.	
31 Ready meals that are not intended to be	- not more than 33 % of the energy content
a complete meal, and that are not covered	can come from fat
by the groups 26, 27, 28, 29 or 30.	- in products that contain fish with more than
	10 % fat, energy content from fat can be
The meal should contain:	not more than 40 %
not loss than 100 keel (100 k l) non stated	 – saturated fatty acids, not more than 10 %
 not less than100 kcal (420 kJ) per stated 	of energy content
portion, and – not less than 50 g vegetables (except	 added sugars, not more than. 3 g/100g
potatoes), legumes (except peanuts), root	– salt, not more than 0.8 g/100 g
vegetables, or fruit and berries per 100 g	– but not more than 2.5 g salt in total per
product.	portion
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.	
Dressings and sauces	
32 Dressings of oil and vinegar.	 – saturated fatty acids, not more than 20 %
The products can have added flavourings.	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	– fat, not more than 5 g/100 g
and products prepared according to the	 – saturated fatty acids, not more than 33 %
producer's instructions).	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 get
	The conditions apply to the ready-to-eat product.
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