Swedish Food Agency regulations on the use of the Keyhole symbol;

(H 128)

This document has been drawn up for informational purposes. Therefore, always check the text against the printed version. This version contains amendments up to and including LIVSFS 2021:1.

The Keyhole symbol

- **1** § These regulations apply to the labelling and presentation of foodstuffs with a certain symbol, the Keyhole symbol. The regulations do not apply to the labelling and presentation of the Keyhole symbol on food that is not prepacked and supplied at mass caterers. (*LIVSFS 2015:1*).
- 1 a § Labelling and presentation of foodstuffs with a symbol relating to the content of fat, sugars, salt and fibre may only be carried out using a symbol (Keyhole symbol) designed in accordance with the pattern below and produced in green or black print.



The labelling and presentation of foodstuffs with the Keyhole symbol may only be carried out if the conditions of the regulation are met.

The terms used in these regulations are shown in *Annex 1*.

The first paragraph does not apply to other symbols on foodstuffs that are lawfully labelled, presented or placed on the market in another Member State within the EEA or Turkey. (LIVSFS 2021:1)

Conditions

2 § The labelling and presentation of foodstuffs with the Keyhole symbol may be

used on prepacked foodstuffs that meet all the conditions for the food group specified in *Annex 2* of these regulations.

In addition, foodstuffs that are not prepacked may be labelled or presented with the Keyhole symbol in the following food groups.

 Unprocessed vegetables in food group 1 (Potatoes, root vegetables, legumes (excluding peanuts) and other vegetables and spices).

- 2 (Fruits and berries).
- 8 a-b (Soft bread, etc. and Rye bread, etc.).
- 9 (Hard bread and crusts).
- 16 (Cheese).
- 17 (Fully or partially vegetable alternatives to group 16).
- 21 (Fishery products and live bivalve molluscs).
- 23 (Unprocessed meat). (LIVSFS 2015:1).
- **3** § Foodstuffs intended for children up to 36 months of age must not be labelled or presented with the Keyhole symbol. (*LIVSFS* 2015:1).
- **4** § The following ingredients must not be contained in foodstuffs labelled or presented with the Keyhole symbol:
 - 1. Sweeteners (food additives),
 - 2. approved novel foodstuffs with sweetening properties, and
 - 3. phytosterols, phytosterol esters, phytostanols and phytostanol esters.

Oil or other fat used in the manufacture of the products may contain a maximum of 2 g of industrially produced trans-fatty acids per 100 g oil or fat.

Fat, sugars and salt may only be added to the foodstuffs for which conditions for fats, sugars or salt are explicitly stated in the respective food group in *Annex 2*. However, this kind of nutrient may be added to foodstuffs in other food groups provided that it is not added in greater quantities than necessary to achieve the desired purpose. (*LIVSFS 2021:1*).

These regulations (LIVSFS 2005:9) shall enter into force on 1 June 2005, when the Swedish Food Agency's Regulations and General Guidelines (SLVFS 1989:2) on the use of certain symbols shall cease to apply.

These regulations (LIVSFS 2009:6) shall enter into force on

- on 1 October 2009 as regards the transitional provisions.
- on 17 June 2009 in other respects.

These regulations (LIVSFS 2015:1) shall enter into force on 1 March 2015.

Products in food groups 22 c), 24 c), 26–28 and 31 that are labelled or presented in accordance with older provisions before 1 March 2019 may, however, be placed on the market until stocks are exhausted.

Products in other food groups labelled or presented

in accordance with older provisions before 1 September 2016 may be placed on the market until stocks are exhausted.

- 1. These regulations (LIVSFS 2021:1) shall enter into force on 1 March 2021.
- 2. Products labelled in accordance with older provisions before 1 September 2022 may be placed on the market until stocks are exhausted.
- 3. Products labelled with the Keyhole symbol followed by the ® symbol before 1 September 2024 may be placed on the market until stocks are exhausted.

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Terms

The following terms apply in these regulations.

- Prepared fishery products: The same meaning as in point 3.6 of Annex 1 of Regulation (EC) No 853/2004 of the European Parliament and of the Council of 29 April 2004 laying down specific hygiene rules for food of animal origin.
- *Processing*: The same meaning as in Article 2 point 1.m of Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 on the hygiene of foodstuffs.
- *Fat:* The same meaning as in point 2 in Annex 1 of Regulation (EU) No 1169/2011 of the European Parliament and of the Council of 25 October 2011 on the provision of food information to consumers, amending Regulations (EC) No 1924/2006 and (EC) No 1925/2006 of the European Parliament and of the Council, and repealing Commission Directive 87/250/EEC, Council Directive 90/496/EEC, Commission Directive 1999/10/EC, Directive 2000/13/EC of the European Parliament and of the Council, Commission Directives 2002/67/EC and 2008/5/EC and Commission Regulation (EC) No 608/2004.
- − *Fibre*: The same meaning as in point 12 in Annex 1 of Regulation (EU) No 1169/2011 of the European Parliament and of the Council.
- Fishery products: The same meaning as in point 3.1 in Annex 1 of Regulation (EU) No 853/2004 of the European Parliament and of the Council.
- Whole grain: The whole kernel of cereal grains (endosperm, germ and bran); the kernel
 may be ground, crushed or similar but all components of the respective

cereal grain must be included in their original proportions.

- Prepacked foods: The same meaning as in article 2.2.e of Regulation
 (EU) No 1169/2011 of the European Parliament and of the Council.
- Gluten-free: The same meaning as in the Commission Implementing-Regulation (EC) No 828/2014 of 30 July 2014 on the requirements for the provision of information to consumers on the absence or reduced presence of gluten in food. (LIVSFS 2021:1)
- *Meat:* The same meaning as in article 2.1 f of Regulation (EU) No 1169/2011 of the European Parliament and of the Council.
- *Live bivalve molluscs*: The same meaning as in point 2.1 in Annex 1 of Regulation (EU) No 853/2004 of the European Parliament and of the Council.
- Fat spreads and blends: The same meaning as in Appendix
 II of Annex VII of Regulation (EU)

- No 1308/2013 of the European Parliament and of the Council of 17 December 2013 establishing a common organisation of the markets in agricultural products and repealing Council Regulations (EEC) No 922/72, (EEC) No 234/79, (EC) No 1037/2001 and (EC) No 1234/2007.
- Saturated fat: The same meaning as in point 3 in Annex 1 of Regulation (EU) No 1169/2011 of the European Parliament and of the Council.
- *Novel foods:* The same meaning as in Regulation (EU) 2015/2283 of the European Parliament and of the Council of 25 November 2015 on novel foods, amending Regulation (EU) No 1169/2011 of the European Parliament and of the Council and repealing Regulation (EC) No 258/97 of the European Parliament and of the Council and Commission Regulation (EC) No 1852/2001.

(LIVSFS 2021:1)

- *Unprocessed products*: The same meaning as in Article 2.1 n of Regulation (EU) No 852/2004 of the European Parliament and of the Council.
- − *Salt*: The same meaning as in point 11 in Annex 1 of Regulation (EU) No 1169/2011 of the European Parliament and of the Council.
- Cereal grain: wheat, spelt, rye, oats, barley, corn, rice, millet and durum and other Sorghum species.
- Flavoured: Addition of flavourings or food ingredients with flavouring properties in accordance the same meaning as provided in Article 3.2 (i) of Regulation (EC) No 1334/2008 of the European Parliament and of the Council of 16 December 2008 on flavourings and certain food ingredients with flavouring properties for use in and on foods and amending Council Regulation (EEC) No 1601/91, Regulations (EC) No 2232/96 and (EC) No 110/2008 and Directive 2000/13/EC.
- Added sugars: All mono-and disaccharides added during the production of foods. Sugars occurring naturally in honey, fruit drinks, fruit juices and fruit concentrate are also covered.
- Trans fat: The same meaning as in point 4 in Annex 1 of Regulation (EU) No 1169/2011 of the European Parliament and of the Council.
- Phytosterols, phytosterol esters, phytostanols and phytostanol esters: The same meaning as in point 5 in Annex III of Regulation (EU) No 1169/2011 of the European Parliament and of the Council.

Conditions for the following food groups

Vegetables, fruit, berries and nuts, etc.

1.	Potatoes, root vegetables, legumes (except peanuts) and other vegetables. The products may be processed. Unprocessed spices are also covered.	 maximum added fat content 3 g/100 g a maximum of 20% of the added fat may be saturated fat maximum added sugars 1 g/100 g maximum salt 0.5 g/100 g
2.	Unprocessed fruits and berries. The products may have been heat-treated.	
3.	Unprocessed nuts and peanuts. The products may have been heat-treated.	- maximum saturated fat content 10 g/100 g

Flour, grains and rice, etc.

4.	Cereal flour, flakes, grains and crushed cereal grains containing 100% whole grain calculated on the basis of the product's dry matter content. Bran and germ of cereal grains are exempted from the requirement for whole grain.	- minimum fibre 6 g/100 g
	The cereal grains may be replaced fully or partially by vegetables (other than potatoes), legumes (other than peanuts) or root vegetables with the same use.	

- 5. Rice containing 100% whole grain calculated on the basis of the product's dry matter content.
- minimum fibre 3 g/100 g
- 6. Breakfast cereals and muesli containing at least 55% whole grain calculated on the basis of the product's dry matter content. If the product contains vegetables (other than potatoes), legumes (other than peanuts) or root vegetables, the proportion of the product constituted by these, is not included in the calculation of the whole grain content.
- 8 g/100 g

 maximum sugars
 13 g/100 g, of which a
 maximum of 9 g/100 g
 added sugars

maximum fat content

- minimum fibre 6 g/100 g
- maximum salt 1.0 g/100 g

Gluten-free breakfast cereals and muesli shall contain at least 20% whole grain calculated on the basis of the product's dry matter content.

Porridge, bread and pasta, etc.

- 7. Porridge and porridge powder prepared in accordance with the manufacturer's instructions, containing at least 55% whole grain calculated on the basis of the product's dry matter content. If the product contains vegetables (other than potatoes), legumes (other than peanuts) or root vegetables, the proportion of the product constituted by these, is not included in the calculation of the whole grain content.
- maximum fat content 4 g/100 g
- maximum sugars 5 g/100 g
- minimum fibre 1 g/100 g
- maximum salt 0.3 g/100 g

The conditions refer to ready-to-consume products.

8. a) Soft bread and bread mixes where only liquid and yeast are to be added, and that contain at least 30% whole grain calculated on the basis of the product's dry matter content. If the product contains vegetables (other than potatoes), legumes (other than peanuts) or root vegetables, the proportion of the product constituted by these, is not included in the calculation of the whole grain content.

Products in food group 8 b) are not covered.

Gluten-free bread and bread mixes shall contain at least 10% whole grain calculated on the basis of the product's dry matter content.

b) Rye bread, bread mixes and other products based on rye, where only liquid and yeast are to be added.

The product shall contain at least 35% whole grain, calculated on the basis of the product's dry matter content. The cereal part shall contain at least 30% rye. If the product contains vegetables (other than potatoes), legumes (other than peanuts) or root vegetables, the proportion of the product constituted by these, is not included in the calculation of the whole grain content.

- maximum fat content 7 g/100 g
- maximum sugars5 g/100 g
- minimum fibre 5 g/100 g
- maximum salt 1.0 g/100 g

The conditions refer to ready-to-consume products.

- maximum fat content 7 g/100 g
- maximum sugars5 g/100 g
- minimum fibre 6 g/100 g
- maximum salt 1.2 g/100 g

The conditions refer to ready-to-consume products.

9. Hard bread, crusts and ready-made mixes for such products where only liquid and yeast are to be added. The product shall contain at least 50% whole grain, calculated on the basis of the product's dry matter content. If the product contains vegetables (other than potatoes), legumes (other than peanuts) or root vegetables, the proportion of the product constituted by these, is not included in the calculation of the whole grain content.

Gluten-free equivalents shall contain at least 15% whole grain calculated on the basis of the product's dry matter content.

- maximum fat content 7 g/100 g
- maximum sugars5 g/100 g
- minimum fibre 6 g/100 g
- maximum salt1.3 g/100 g

The conditions refer to ready-to-consume products.

10. Pasta (without filling)
The product shall contain at least 50% whole grain, calculated on the basis of the product's dry matter content.

If the product contains vegetables (other than potatoes), legumes (other than peanuts) or root vegetables, the proportion of the product constituted by these, is not included in the calculation of the whole grain content.

Gluten-free pasta (without filling) has no whole grain requirements.

- minimum fibre 6 g/100 g
- maximum salt
 0.1 g/100 g

The conditions refer to the product's dry matter content.

Milk, fermented products and vegetable alternatives, etc.

11. a) Milk and equivalent fermented milk products intended as a drink and not flavoured.

- maximum fat content 0.7 g/100 g

	Equivalent lactose free products and lactose free milk drinks are also covered. b) Vegetable products intended for the same use as products in food group 11 a). The products may not be flavoured.	 maximum fat content 1.5 g/100 g maximum saturated fat content 33% of the total fat content maximum sugars 5 g/100 g maximum salt 0.1 g/100 g
12.	a) Fermented milk products not intended as a drink and not flavoured.Equivalent lactose free products are also covered.	- maximum fat content 1.5 g/100 g
	b) Vegetable products intended for the same use as products in food group 12 a). The products may not be flavoured.	 maximum fat content 1.5 g/100 g maximum saturated fat content 33% of the total fat content maximum sugars 5 g/100 g maximum salt 0.1 g/100 g
13.	a) Fermented milk products not intended as a drink.The products may be flavoured.Equivalent lactose free products are also covered.	 maximum fat content 1.5 g/100 g maximum added sugars 4 g/100 g
	b) Vegetable products intended for the same use as products in food group 13 a).	- maximum fat content 1.5 g/100 g

	The products may be flavoured.	 maximum saturated fat content 33% of the total fat content maximum sugars 8 g/100 g maximum salt 0.1 g/100 g
14.	a) Products consisting of a mixture of milk and cream, intended as an alternative to cream, and equivalent fermented products. The products may not be flavoured. Equivalent lactose free products are also covered.	- maximum fat content 5 g/100 g
	b) Products that are fully or partially of vegetable origin intended for the same use as the products in food group 14 a). The products may not be flavoured.	 maximum fat content 5 g/100 g maximum saturated fat content 33% of the total fat content maximum sugars 5 g/100 g maximum salt 0.3 g/100 g
15.	a) Products consisting of a mixture of milk and cream, intended as an alternative to cream, and equivalent fermented products. The products may be flavoured. Equivalent lactose free products are also covered.	 maximum fat content 5 g/100 g maximum sugars 5 g/100 g maximum salt 0.8 g/100 g
	b) Products that are fully or partially of vegetable origin intended for the same use as the products in food group 15 a). The products may be flavoured.	 maximum fat content 5 g/100 g maximum saturated fat content 33% of the total fat content maximum sugars

	5 g/100 g – maximum salt 0.8 g/100 g

Cheese and equivalent vegetable products

16.	Cheese. Products in food group 18 are not covered. The products may be flavoured.	 maximum fat content 17 g/100 g maximum salt 1.6 g/100 g
17.	Products that are fully or partially of vegetable origin intended for the same use as the products in food group 16. The products may be flavoured.	 maximum fat content 17 g/100 g maximum saturated fat content 20% of the total fat content maximum salt 1.5 g/100 g
18.	Fresh cheese and equivalent products. The products may be flavoured.	 maximum fat content 5 g/100 g maximum salt 0.9 g/100 g maximum added sugars 1 g/100 g

Fat spread and oils, etc.

19.	Fat spreads and fat spread blends. The products may be flavoured.	 maximum fat content 80 g/100 g maximum saturated fat content 33% of the total fat content maximum salt 1.1 g/100 g
20.	Cooking oils, liquid fat spread and liquid fat spread blends. The products may be flavoured.	 maximum saturated fat content 20% of the total fat content maximum salt 1.0 g/100 g

Fishery products and products derived from these

21.	Fishery products and live bivalve molluscs. The products may be prepared.	
22.	Products produced from a minimum of 50% processed fishery products. The products may contain sauce or broth. The percentage and conditions concern those parts of the product intended for consumption. The products may be coated with breadcrumbs but the cooking instructions must not add fat.	
	a) Products not covered by food groups 22 b-d.	 maximum fat other than fish fat 10 g/100 g maximum sugars 5 g/100 g maximum salt 1.5 g/100 g
	b) Sliced cold cut products.	 maximum fat other than fish fat 10 g/100 g maximum sugars 5 g/100 g maximum salt 2.5 g/100 g
	c) Smoked or marinated fish.	 maximum fat other than fish fat 10 g/100 g maximum sugars 5 g/100 g maximum salt 3.0 g/100 g

d) Caviar and other	 maximum fat other than
tinned/semi-preserved fish	fish fat 10 g/100 g
products.	maximum sugars
	5 g/100 g
	maximum salt
	3.0 g/100 g

Meat and products containing meat

23.	Unprocessed meat.	- maximum fat content 10 g/100 g
24.	Meat and products containing meat. At least 50% of the product shall consist of meat, cereal grain (100% whole grain) we getables (other	10 g/100 g
	whole grain), vegetables (other than potatoes), legumes (other than peanuts) or root vegetables. However, the meat content shall not be less than 20% of the product. However, these requirements do not apply to liver pâté, which must be produced from a minimum of 35% meat.	
	The products may contain sauce or broth. The percentage and conditions concern those parts of the product intended for consumption. The products may be coated with breadcrumbs but the cooking instructions must not add fat.	
	a) Raw products made from whole or carved pieces of meat that are surface marinated or seasoned.	 maximum fat content 10 g/100 g maximum sugars 3 g/100 g maximum salt 1.0 g/100 g

The following conditions apply to injection-salted meat.	 maximum fat content 10 g/100 g maximum sugars 3 g/100 g maximum salt 0.5 g/100 g
b) Raw or ready-to-eat products where minced or ground meat is the main ingredient.	 maximum fat content 10 g/100 g maximum added sugars 3 g/100 g maximum salt 1.7 g/100 g
The following conditions apply to – sausages,	 maximum fat content 10 g/100 g maximum added sugars 3 g/100 g maximum salt 2.0 g/100 g
- cold cut sausages,	 maximum fat content 10 g/100 g maximum added sugars 3 g/100 g maximum salt 2.2 g/100 g
Minced meat where only salt and water are added.	 maximum fat content 10 g/100 g maximum sugars 3 g/100 g maximum salt 1.0 g/100 g
c) Ready-to-consume or smoked products, where the main ingredient is whole or carved meat not covered by food group 24 b). The following conditions apply to	 maximum fat content 10 g/100 g maximum added sugars 3 g/100 g maximum salt 2.0 g/100 g
cold cut products.	 maximum fat content 10 g/100 g maximum added sugars 3 g/100 g

	- maximum salt 2.5 g/100 g

Fully or partially vegetable products

25.	Products that are fully or partially of vegetable origin intended for the same use as the products in food groups 22 and 24. At least 50% of the product shall consist of cereal grain (100% whole grain), vegetables (other than potatoes), legumes (other than peanuts), root vegetables or protein of non-animal origin. The product must not contain meat or fishery products. The products may contain sauce or broth. The percentage and conditions concern those parts of the product intended for consumption.	
	The products may be coated with breadcrumbs but the cooking instructions must not add fat.	
	a) Sliced sandwich cuts	 maximum fat content 10 g/100 g maximum saturated fat content 3.5 g/100 g maximum added sugars 3 g/100 g maximum salt 1.5 g/100 g
	b) For other products in food group 25	 maximum fat content 10 g/100 g maximum saturated fat content 3.5 g/100 g maximum added sugars 3 g/100 g

	– maximum salt 1.0 g/100 g	

Ready meals

- 26. Ready meals with vegetables, a protein-containing part, and a carbohydrate-containing part, with
 - minimum 28 g vegetables (other than potatoes), legumes (other than peanuts), root vegetables or fruit and berries per 100 g product,
 - a protein-containing part and
 - a carbohydrate-containing part,

and that are not covered by the food groups 27, 28, 29 or 30.

If the carbohydrate part of the dish contains cereal grains, it must fulfil the requirement for whole grain as stated in the food group relevant for the carbohydrate part.

If gluten-free pasta is included, the fibre condition in food group 10 will apply.

- maximum saturated fat content 1.8 g/100 g
- maximum added sugars
 3 g/100 g
- maximum salt 0.8 g/100 g

- 27. Ready meals with vegetables, a protein-containing part, or a carbohydrate-containing part, with
 - minimum 50 g vegetables (other than potatoes), legumes (other than peanuts), root vegetables or fruit and berries per 100 g product, and
 - a protein-containing part, or
 - a carbohydrate-containing part.

- maximum saturated fat content 1.5 g/100 g
- maximum added sugars3 g/100 g
- maximum salt 0.8 g/100 g

If the carbohydrate part of the dish contains cereal grains, it must fulfil the requirement for whole grain as stated in the food group relevant for the carbohydrate part.

If gluten-free pasta is included, the fibre condition in food group 10 will apply.

28. Pirogues, pizzas, spring rolls, other pies than dessert pies and similar products.

The products shall contain at least 28 g vegetables (other than potatoes), legumes (other than peanuts), root vegetables or fruit and berries per 100 g.

Any cereal part shall contain at least 30% whole grain, calculated on the basis of the cereal part's dry matter content.

If the product contains at least 50 g vegetables (other than potatoes), legumes (other than peanuts), root vegetables or fruit and berries per 100 g, any cereal part of the product shall contain at least 15% whole grain, calculated on the basis of the cereal part's dry matter content.

If a gluten-free cereal part is included, it shall contain at least 10% whole grain calculated on the basis of the cereal part's dry matter content.

- maximum saturated fat content 2.0 g/100 g
- maximum added sugars3 g/100 g
- maximum salt 1.0 g/100 g

29. Sandwiches, baguettes, wraps and similar products.

The product shall contain at least 25 g vegetables (other than potatoes), legumes (other than peanuts), root vegetables or fruit and berries per 100 g.

Any cereal part shall contain at least 30% whole grain, calculated on the basis of the cereal part's dry matter content.

If the product contains at least 50 g vegetables (other than potatoes), legumes (other than peanuts), root vegetables or fruit and berries per 100 g product, any cereal part of the product shall contain at least 15% whole grain, calculated on the basis of the cereal part's dry matter content.

If a gluten-free cereal part is included, it shall contain at least 10% whole grain calculated on the basis of the cereal part's dry matter content.

- maximum saturated fat content 2.0 g/100 g
- maximum added sugars3 g/100 g
- maximum salt 0.9 g/100 g

30. Soups

The product shall contain at least 35 g vegetables (other than potatoes), legumes (other than peanuts), root vegetables or fruit and berries per 100 g.

Any cereal part shall fulfil the requirement for whole grain in the food group in question.

If gluten-free pasta is included, the fibre condition in food group 10 will apply.

- maximum saturated fat content 1.5 g/100 g
- maximum added sugars
 3 g/100 g
- maximum salt 0.8 g/100 g

The conditions refer to ready-to-consume products.

Dressings and sauces

	Pressings of oil and vinegar. The products may be flavoured.	 maximum saturated fat content 20% of the total fat content maximum sugars 5 g/100 g maximum salt 0.8 g/100 g
aı ir	auces (both ready-made sauces nd products that must be prepared accordance with the preparation estructions).	 maximum fat content 5 g/100 g maximum saturated fat content 33% of the total fat content maximum sugars 5 g/100 g maximum salt 0.8 g/100 g The conditions refer to ready-to-consume products.

(LIVSFS 2021:1)