

Danish Whole Grain Logo - User Manual



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The board of directors of the Danish Whole Grain Partnership approved this revised manual on 2 March 2015. Only the board of directors can approve changes to this manual, with veto rights from the Danish Veterinary and

Food Administration. This manual is valid from 1 March 2015 and until the end of the current campaign period, which expires on 31 March 2020.

Food products may still be manufactured, labelled, and marketed in accordance with the criteria in the manual (approved on 7 March 2013 in its revised version) until 1 September 2016. Food products that are marketed or labelled before 1 September 2016, in accordance with the criteria in the manual (approved on 7 March 2013 in its revised version) can be sold until stocks are used up.

Chapter 1: Eligibility guidelines for the use of the Danish whole grain logo by individual persons, companies, organisations, etc., including guidelines on the financial terms applied.

These guidelines are developed in order to ensure that the Danish whole grain logo and hereby the message on eating more whole grains is spread out widely among the Danish population. In addition, these guidelines are used to control the use of the Danish whole grain logo such that its authenticity, merit, and its message's credibility are preserved at all times.

1.1 The Danish Whole Grain Logo

The Danish whole grain logo is a trademark registered and legal owned by the Danish Veterinary and Food Administration. The Danish Whole Grain Partnership's secretariat is responsible for the logo administration.



1.2 Use of the Danish Whole Grain logo by partners

The partners in the Danish Whole Grain Partnership are listed on www.fuldkorn.dk. The partners are free to use the Danish whole grain logo in accordance with the design and application guidelines described in this manual. New partners, such as food producers, organisations, and other stakeholders can be granted permission by the board of directors to use the logo against payment of a participation fee. Food producers must have at least one product on the market that lives up to the logo's application rules. The payment of the participation fee allows for the use of the Danish whole grain logo on products, packages, flyers, websites, letterheads, advertisements, etc., as long as its use follows the guidelines described in this manual.

Generic exposure of the Danish whole grain logo, as described in section 1.4, and editorial coverage and mentions do not require the payment of a fee. The Danish Whole Grain Partnership's secretariat will provide guidance on this subject.

1.3 Partnership Agreement and participation fee

All producers, organisations, and other stakeholders that have signed a written agreement and have been approved by the Danish Whole Grain Partnership's board of directors are welcome to join the partnership agreement and are allowed to use the Danish whole grain logo throughout the campaign period.

The agreement must be signed and sent to the Danish Whole Grain Partnership's secretariat before the logo is used. The partnership agreement should be sent to the campaign manager.

1. Standard membership

If a partner has a turnover that is less than DKK 5 million per year excluding VAT, the Danish Whole Grain Partnership membership fee is DKK 10,000 per year excluding VAT.

If a partner has a turnover that is less than DKK 15 million per year excluding VAT, the Danish Whole Grain Partnership membership fee is DKK 25,000 per year excluding VAT.

If a partner has a turnover that is over DKK 15 million per year excluding VAT, the Danish Whole Grain Partnership membership fee is DKK 50,000 per year excluding VAT.

2. Membership to BKD and members

BKD pays DKK 100,000 per year excluding VAT for membership to the Danish Whole Grain Partnership.

From 1 April 2015, the following applies to BKD members who want to use the Danish whole grain logo on their products.

Members of BKD with a turnover below DKK 15 million per year pay DKK 0 in membership contribution to the Danish Whole Grain Partnership since the member is covered by BKD's contribution to the Danish Whole Grain Partnership.

Members of BKD with a turnover above DKK 15 million per year, of which 20% comes from sales to retailers and wholesalers / externally pay DKK 25,000 per year for membership to the Danish Whole Grain Partnership.

3. Membership for retail chains

From 1 April 2015, retail chains pay DKK 150,000 excluding VAT in membership contribution to the Danish Whole Grain Partnership.

4. Membership for educational institutions

These pay DKK 10,000 per year excluding VAT in membership.

5. Membership for catering sector and foodservice sector

These pay DKK 50,000 per year excluding VAT in membership.

The participation agreement for the Danish Whole Grain Campaign, the use of the Danish whole grain logo, and the associated fee are signed for, for a period of three years – or otherwise throughout the current campaign period.

However, the partners are bound for a period of one accounting year at a time – according to §1 in the partnership agreement. Each producer, organisation, or other stakeholder that wishes to use the Danish whole grain logo will pay one participation fee only, regardless of the number of products that live up to the logo's

guidelines, or how many stores, workplaces, etc. the producer or organisation provides for. However, independent legal entities in the same organisation or company must sign individual partnership agreements.

1.4 Use of the Danish whole grain logo by others outside of the Danish Whole Grain Partnership

Stakeholders that are not members of the Danish Whole Grain Partnership are welcome to help promote the Danish whole grain logo as described in the design manual and in the logo manual.

The following restrictions apply to stakeholders outside of the Danish Whole Grain Partnership:

The Danish whole grain logo as well as the slogan "Vælg fuldkorn først" ("Choose whole grain first") are not allowed on the stakeholders' packages and similar

The Danish whole grain logo as well as the slogan "Vælg fuldkorn først" ("Choose whole grain first") may not be used in the marketing of specific products – e.g. in adverts or similar

- The Danish whole grain logo as well as the slogan "Vælg fuldkorn først" ("Choose whole grain first") may not be used for direct or indirect marketing of the producer and brand.

This does not apply to the retailer's private label products. Please find examples in section 2.4.3.1 "Partner and non-partner use of the Danish whole grain logo".

Stakeholders outside of the Danish Whole Grain Partnership can, for instance, use the logo as follows – see also section 2.4:

- In educational materials – e.g. for use in schools
- As part of generic information – e.g. in a municipal framework, in hospitals, etc.
- In media contexts – e.g. in articles or electronic media
- In the retail area, see section 2.4.3.2
- In canteens, restaurants, and similar, see section 2.4.2
- In bakeries, in-store bakeries, and similar, see section 2.4.1

An important condition for the use of the Danish whole grain logo is that the logo is never used in a way that could be interpreted as misleading – according to ordinary misleading-avoidance guidelines. The Danish whole grain logo must only be presented in a context where its appearance is natural. The remaining text, sound, pictures, and illustrations (among others) must underline the message about whole grain and be in accordance with the logo.

Furthermore, the guidelines for logo design must be met.

1.5 Control of the use of the Danish whole grain logo

The Danish Veterinary and Food Administration conducts the governmental control on the use of the Danish whole grain logo, with particular emphasis on misguidance aspects. This is part of the customary and regular control with, inter alia, labelling and control in conjunction with consumer inquiries. The Danish Veterinary and Food Administration's control includes control on whether the rules for the use of the logo are properly upheld and whether the logo is used in a misleading way.

It is the company's responsibility to demonstrate to the inspector that a logo-carrying product adheres to requirements.

More details on how this control is undertaken can be found on the Danish Veterinary and Food Administration's website, www.fvst.dk.

1.6 Withdrawal of the right to use the Danish whole grain logo

The Danish Whole Grain Partnership's secretariat maintains an updated partner list on the website www.fuldkorn.dk. Wrongful use of the Danish whole grain logo, in accordance with chapter two in this manual, by any partner with a signed partnership agreement, gives the Danish Whole Grain Partnership's secretariat in consultation with the board of directors the possibility of withdrawing their right to use the logo.

Chapter: 2. Guidelines for use of the Danish whole grain logo

2.1 Purpose of use of the Danish whole grain logo

For the partners engaged in the Danish Whole Grain Partnership the purpose of use of the Danish whole grain logo is to disseminate knowledge of the logo and of the slogan "Choose whole grain first". Furthermore, knowledge about whole grain should be generally increased. The background of the Danish whole grain logo is the Danish Veterinary and Food Administration's official recommendation formulated in the official dietary guidelines:

Choose whole grain

Eat at least 75 g of whole grain per day. You find whole grain in foods made from cereals where the whole grain is included. 75 grams of whole grain is e.g. 2 dl rolled oats / oatmeal, and one slice of rye bread.

Choose whole grain first – it is easy if you look for the Danish whole grain logo when you buy your groceries.

The Danish whole grain logo is your guarantee for a high content of dietary fibre and whole grain in bread, groats, flour, breakfast cereals, rice, and pasta.

Choose rye bread or other whole grain bread for your packed lunch.

You can choose whole grain rice or whole grain pasta as part of your hot meal once in a while.

The general goal of the work of the Danish Whole Grain Partnership is formulated in the partnership's vision and mission:

Vision

The Danish Whole Grain Partnership promotes public health by contributing to a higher intake of whole grain amongst the Danish population.

Mission

The Danish Whole Grain Partnership increases the Danish population's accessibility to whole grain products, and disseminates knowledge of the benefits of whole grain.

The dietary recommendation on whole grain is just one among several dietary recommendations, and as such it is important that communication of the whole grain logo is not in conflict with the remaining dietary recommendations. The guidelines in chapters two, three, and four ensure this. Besides, these guidelines guarantee the credibility of the Danish whole grain logo.

The Danish whole grain logo's purpose is to make it easy for consumers to choose products with a high whole grain content (as long as the products' overall nutritional profile is also recommendable). Furthermore, the Danish whole grain logo fulfils a function as the visual linking element for a series of different activities within the scope of the Danish Whole Grain Partnership's work.

2.2 Application terms

The context in which the Danish whole grain logo is presented must be in accordance with the logo's purpose, and it must neither mislead nor confuse the Danish population.

The Danish whole grain logo must only be presented in a context where its appearance is natural. E.g. information and teaching materials whose purpose is to inform the public about healthy foods, grocery shopping, storage, preparation, and choice of products with a high whole grain content. Other text, voice-overs, pictures, and illustrations – e.g. with other products – must still stress the message on whole grain, and must also be in accordance with the logo.

The Danish whole grain logo might also be used in campaigns that live up to the overall vision for the Danish Whole Grain Partnership – which is to promote public health by helping the Danish population eat more whole grain.

The Danish Whole Grain logo can be used in all types of campaign materials, e.g. videos, radio and TV shows, internet materials, newspapers and magazines, posters, fliers, and other publications.

For the use of the Danish Whole Grain logo on labels of pre-packaged goods and on recipes, please check the specific guidelines under sections 2.3, 2.3.1, 2.4.3, 2.4.4, 2.4.5, and in chapter 3.

The use of the Danish whole grain logo in goods and products must not give the impression that a specific product or a particular brand is recommended ahead of other whole grain logo carrying products.

2.3 Demands and product requirements

Overall, it is important that products carrying the Danish whole grain logo contribute to the image of a credible logo, which is a guarantee for healthy whole grain products.

The designation "whole grain products" covers the following types of products:

- Flour, groats, flakes and cracked kernels
- Flour blends
- Rice
- Breakfast cereals and muesli
- Porridge and instant porridge powders
- Bread and bread mixes
- Rye bread and other rye-based products such as bread mixes
- Crisp bread and crusts
- Bread crumbs
- Pasta and noodles (without filling)

Whole grain content requirements for products with the Danish whole grain logo:

- Flour, groats, flakes, and cracked kernels: 100% whole grain calculated as product dry matter (% DM)
- Flour blends: At least two types of flour, of which whole grain flour makes up at least 60%, calculated as a percentage of the product's dry matter (% DM).
- Rice 100% whole grain calculated based on the product's dry matter content.

- Breakfast cereals and muesli: At least 65% whole grain calculated as product dry matter (% DM)
- Porridge and instant porridge powders (for powders the requirement applies to the product after preparation): At least 70% whole grain calculated as product dry matter (% DM)
- Bread and bread mixes: At least 50% whole grain calculated as product dry matter (% DM) and at least 30% whole grain calculated as quantitative ingredient declarations (QUID). Both requirements must be met.
- Rye bread and other rye-based products as well as bread mixes: At least 50% whole grain calculated as product dry matter (% DM) and at least 30% whole grain calculated as quantitative ingredient declarations (QUID). Both requirements must be met. For the products, at least 30% of the cereals must be whole grain rye.
- Crisp bread and crusts: At least 60% whole grain calculated as product dry matter (% DM)
- Bread crumbs: At least 60% whole grain calculated as product dry matter (% DM)
- Pasta and noodles (without fill): At least 60% whole grain calculated as product dry matter (% DM)

Calculation of whole grain content as product dry matter:

% whole grain calculated as product dry matter (%DM):

$$\frac{\text{Amount of dry matter from whole grain ingredients}}{\text{product's total amount of dry matter}} \times 100$$

See appendix 2 for a more detailed calculation model for QUID and dry matter. Also, see the guidelines in Nøglehulsbekendtgørelsen (Danish order on the use of the keyhole label).

Whole grain is defined as the entire kernel of grain/cereal (germ, endosperm, bran). The kernels can be ground, cracked, or similar, but the components of the respective cereals must be in the same proportion as in the intact kernels. In other words, it is not permitted to use the whole grain logo on products where the proportion between the endosperm, germ, or bran is attained through calculation.

The whole grain definition covers the following cereals / corn species: Wheat, spelt or dinkel wheat, rye, oat, barley, maize, rice, millet, durra and other sorghum species. Wild rice and quinoa are not included in the whole grain definition.

For further information about the definition of whole grain, we refer to Vejledning om anvendelse af Nøglehulsmærket på fødevarer m.v. section 2.2.4.

Other requirements for products with the Danish whole grain logo

In order to ensure that the Danish whole grain logo is only used on healthier products, it is also a requirement that these products comply with requirements for fat, sugar, dietary fibre, and salt content corresponding to the respective product categories in the Danish order on the use of the Keyhole label.

The following table presents an overview of the requirements for the content of whole grain and other nutrients in logo-carrying products. Unless otherwise stated the requirements for fat, sugar, salt, and fibre content are to be understood as the content for these nutrients in the final product:

category ¹	Product group	Whole grain	Other requirements
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¹The category refers to the Danish order on the keyhole label categories, except category 4a and 4b.

4a ²	Flour, flakes, groats, cracked cereal kernels	100% whole grain calculated as product dry matter (% DM)	<ul style="list-style-type: none"> Dietary fibre – at least 6 g / 100 g
4b ³	Flour blends	At least two types of flour, of which whole grain flour makes up at least 60%, calculated as a percentage of the product's dry matter (% DM)	<ul style="list-style-type: none"> At least 6 g dietary fibre / 100 g
5.	Rice	100% whole grain calculated based on the product's dry matter content.	<ul style="list-style-type: none"> At least 3 g dietary fibre / 100 g
6.	Breakfast cereals and muesli	At least 65% whole grain calculated as product dry matter (% DM)	<ul style="list-style-type: none"> Fat – max 8 g / 100 g sugars max 13 g / 100g added sugars max 9 g / 100g Dietary fibre – at least 6 g / 100 g Salt – max 1.0 g / 100 g
7.	Porridge and instant porridge powders (prepared according to the manufacturer's guidelines)	At least 70% whole grain calculated as product dry matter (% DM)	<ul style="list-style-type: none"> Fat – max 4 g / 100 g sugars max 5 g / 100g At least 1 g dietary fibre / 100 g Salt – max 0.3 g / 100 g
8a	Bread and bread mixes where only water and yeast need to be added (for bread mixes, the criteria are applied to the final product)	At least 50% whole grain calculated as product dry matter (% DM), and at least 30% whole grain calculated as quantitative ingredient declarations (QUID). Both requirements must be met.	<ul style="list-style-type: none"> Fat – max 7 g / 100 g sugars max 5 g / 100g at least 5 g dietary fibre / 100 g Salt – max 1.0 g / 100 g
8b	Rye bread and other rye-based products such as bread mixes where only water and yeast need to be added	At least 50% whole grain calculated as product dry matter (% DM), and at least 30% whole grain calculated as quantitative ingredient declarations (QUID). Both requirements must be met. For the products, at least 30% of the cereals must be whole grain rye.	<ul style="list-style-type: none"> Fat – max 7 g / 100 g sugars max 5 g / 100g Dietary fibre – at least 6 g / 100 g Salt – max 1.2 g / 100 g
9a ⁴	Crisp bread and crusts	At least 60% whole grain calculated as product dry matter (% DM)	<ul style="list-style-type: none"> fat - max 7 g / 100 g sugars max 5 g / 100g Dietary fibre – at least 6 g / 100 g salt – max 1.3 g / 100 g
9b ⁵	Bread crumbs	At least 60% whole grain calculated as product dry matter (% DM)	<ul style="list-style-type: none"> fat - max 7 g / 100 g sugars max 5 g / 100g Dietary fibre – at least 6 g / 100 g salt – max 1.3 g / 100 g
10.	Pasta and noodles (not filled)	At least 60% whole grain calculated as product dry matter (% DM)	<ul style="list-style-type: none"> Dietary fibre – at least 6 g / 100 g⁶ salt – max 0.1 g / 100 g

² Category 4a is identical to category 4 in the Danish order on the keyhole label.

³ Category 4b is a new and independent category in the Danish whole grain logo manual.

⁴ Category 9a is identical to category 9 in the Danish order on the keyhole label.

⁵ Category 9b is a new and independent category in the Danish whole grain logo manual.

⁶ The criteria for pasta and noodles are calculated for product dry matter.

2.3.1 Rules for pre-prepared meals and products

Products carrying the Danish whole grain logo must not give the impression of being recommended or approved by the organisations, companies, or authorities behind the logo. A percentage indication of the whole grain content in the final product can be added to the front of a product's packaging as a supplement to the Danish whole grain logo. The whole grain percentage indication must refer to the percentage of whole grain content volume included in proportion to the final product (quantitative ingredient declaration - QUID). This means that the Danish whole grain logo must not appear together with a whole grain content indication that indicates the whole grain content of the product as a percentage of the flour/grain content if the product also includes other ingredients. For example, it is not allowed to write, "50% of the flour is whole grain" on a bread product with the Danish whole grain logo.

The back (or front) of the products must include the following text:

"The Danish Veterinary and Food Administration recommends the intake of at least 75 grams of whole grain a day, as part of a varied diet. This product contains X grams of whole grain per 100 grams."

This quantitative indication must follow the rules for quantitative ingredients declarations (QUID), i.e. it must be indicated as the detailed whole grain weight calculated in proportion to the weight of the final product, cf. above. E.g. for bread mixes and instant porridge powders the whole grain content in grams / 100 grams of product calculated as QUID must be presented as the content in the final, cooked product, in accordance with the cooking guidelines presented in the product's packaging. E.g.:

"The Danish Veterinary and Food Administration recommends the intake of at least 75 grams of whole grain a day, as part of a varied diet. This product contains X grams of whole grain per 100 grams of product, when prepared according to the cooking guidelines in this package."

As a supplement, producers can voluntarily specify the whole grain content per portion or the whole grain content calculated based on the product's dry matter (% DM).

In the event that the QUID calculation shows that more than 100 grams of whole grains have been used for the product, producers may contact the secretariat for guidance on how whole grain content can be specified. It only confuses the consumer if the packaging says e.g. "The product contains 102 grams of whole grains per. 100 grams".

The Danish whole grain logo does not require the use of nutrition labelling, since whole grain is an ingredient and not a nutrient per se. The specification of whole grain ingredients in the ingredient list follows the usual labelling rules.

2.3.2 Rules for non-pre-packed products

For non-prepacked products sold over the counter at bakeries, in-store bakeries, and similar applies:

- Bread and similar products can be marketed with the Danish whole grain logo applied directly on bread, e.g. sign located on the bread, if this is not likely to mislead the consumer. This can be ensured if e.g. the shelf edge, rack or equivalent directly related to the bread is also labeled with the Danish whole grain logo or if the product name is on the sign.
- It is important that the company ensures that the label is not moved to a different bread or product, this may be a risk for self-service display cases.
- The wording "The Danish Veterinary and Food Administration recommends the intake of at least 75 grams of whole grain a day as part of a varied diet" must be visible to consumers.

- The amount of whole grain in each product (X grams whole grain per 100 grams of product) must be visible to consumers.
- Before using the Danish whole grain logo, both the responsible baker and its staff should have undergone the Danish Whole Grain Partnership’s educational material for bakeries. The material can be acquired by request from the secretariat.

When displaying the Danish whole grain logo for non-pre-packed products sold in canteens, restaurants, and similar, the following must be clearly displayed to customers:

- The text “The Danish Veterinary and Food Administration recommends the intake of at least 75 grams of whole grain a day, as part of a varied diet” must be visible to customers.
- Minimum limits for whole grain content of the different product categories (e.g. "bread with whole grains logo consists of at least 30% whole grain").
- It should be clear to consumers which specific products meet the Danish whole grain logo, e.g. by table signs at the buffet by the product.
- Before using the Danish whole grain logo, the canteen staff should have reviewed the Danish Whole Grain Partnership’s educational material. The material can be acquired by request from the secretariat.

2.4. Partner and non-partner use of the Danish whole grain logo

The rules for the use of the Danish whole grain logo in a series of specific contexts by partners and non-partners are as follows.

2.4.1 Bakeries, in-store bakeries, and similar

	Non-partners	Partners – can use the logo in the same way as non-partners and also as described below
Bakeries, in-store bakeries and similar	The logo follows the product – meaning, products eligible to carry the logo from the producers’ side are also allowed to carry the logo when a non-partner is to sell them on to consumers; e.g. bake off products and 100 % bread mixes where only yeast and water need to be added.	May use the logo on own breads, if they can document that the bread lives up to the logo guidelines.

For both partners and non-partners, it applies that when the Danish whole grain logo is used in stores, the labelling requirements described in section 2.3.2 must be met.

2.4.2 Restaurants and canteens

	Non-partners	Partners – can use the logo in the same way as non-partners and also as described below
Restaurants and canteens	<ul style="list-style-type: none"> • The logo follows the product – meaning, products eligible to carry the logo from the producers’ side are also allowed to carry the logo when served; e.g. fully baked bread, breakfast products, bread mixes where only yeast and water need to be added, as well as rice, pasta and grains that only need to be cooked (restrain salt use here). • Are not allowed to use the logo on own products; e.g. own baked bread. 	<ul style="list-style-type: none"> • May use the logo on all whole grain products that live up to the logo guidelines; e.g. rice, pasta, bread, breakfast cereals and grains, etc. • May use the logo on their own produced bread, if they can document that the bread lives up to the logo’s guidelines.

For both partners and non-partners, it applies that when the Danish whole grain logo is used in canteens, restaurants, and similar, the labelling requirements described in section 2.3.2 must be met. Flags and similar signs are not allowed directly on the food. Before using the Danish whole grain logo, the canteen staff should have reviewed the Danish Whole Grain Partnership’s educational material. The material can be required with the secretariat.

2.4.3 Private label and the retail business

2.4.3.1 Definition of private label

A private label is a product that is marketed under the retailer's name and brand. For example, Coop Ånglemark, Coop X-tra, Princip from Dansk Supermarked, and Gram from REMA1000.

A product is regarded as a private label if it is marketed under the seller's brand (i.e. the manufacturer's name/brand and not the retailer's name/brand) and it only states on the back that the product is made for "xxx retailer chain in Denmark/XX-country". This applies irrespective of whether the retail business has sole distributor rights for the product or owns the rights to the product.

A product that is traded under a sole distributorship by a retailer or which a retailer owns the rights to, but where the retailer does not feature in any way on the packaging, is thus not regarded as a private label and therefore cannot obtain the Danish whole grain label unless the supplier is a partner in the Danish Whole Grain Partnership.

	Non-partners	Partners – can use the logo in the same way as non-partners and also as described below
Private label products	The logo follows the product – meaning, non-partners may use the logo on private label product series that are produced by partners in the Danish Whole Grain Partnership.	<ul style="list-style-type: none"> • May use the logo on own private label products. • May use the logo on private label products produced by non-partners.

2.4.3.2 Definition of the retail business

Retailing refers to sales of goods to private consumers/end-users. The retailing business buys goods in large quantities, either directly from the manufacturer or through a wholesaler, and then sells these on to consumers in smaller quantities. The retailing business includes sale to consumers via physical shops, post orders, and the internet. A retailer is the opposite of a wholesaler. A retail business only sells goods on the consumer market, i.e. to private individuals.

	Non-partners	Partners – can use the logo in the same way as non-partners and also as described below
The retail business	<ul style="list-style-type: none"> • The logo follows the product – meaning, products eligible to carry the logo on the producers’ side are also allowed to carry the logo when a non-partner retailer sells them on. • May use the logo on private label products produced by a partner in the Danish Whole Grain Partnership. 	May use the logo on private label products - also when produced by a partner outside the Danish Whole Grain Partnership.

Below, you can find a description of how the Danish whole grain logo may be used in the retail business. This refers to how the logo may be used in store as well as in advertising materials - e.g. fliers. Both partners and non-

partners may use the Danish whole grain logo as described below. Non-partners are limited in their use of the logo as described above and in section 1.4.

The following is a suggestion that can be used as general guidance for the setup of signs, shelf labels, posters, and similar, with the Danish whole grain logo in shops. But it is difficult to draw very general rules that cover all possible marketing methods in shops.

It is therefore hereby emphasised that all marketing applying the Danish whole grain logo is subject to ordinary rules on the avoidance of misleading marketing, and subject to the Danish Veterinary Administration's control and evaluation of the specific conditions in the individual stores. This implies that certain marketing strategies with the Danish whole grain logo might still be considered to be violating the logo appliance guidelines, as well as the rules on misleading marketing, even though these strategies apparently follow the suggestions described here.

In relevant sections in the shop

The suspension of signs and similar with the Danish whole grain logo can take place in sections in the shop where there are logo-carrying products on the shelves – e.g. sections for bread, flour, and breakfast products. Or in displays of logo-carrying products. The suspension of signs and similar must not be misleading for consumers and must follow the ordinary rules on misleading marketing and labelling practices.

In hallways and entranceways

The suspension of signs and similar with the Danish whole grain logo in hallways and entranceways in order to draw customers' attention to the possibility of looking for logo-carrying products is generally permitted. If any text is added under the Danish whole grain logo, we encourage the use of a text that draws the customers' attention to the possibility of finding logo-carrying products.

If a text can be interpreted as pointing to all products in a section or possibly in the whole store as carrying the whole grain logo, it will be considered to violate both rules for appliance of the Danish whole grain logo, as well as ordinary rules on the avoidance of misleading marketing.

Marketing in distributed supermarket leaflets, advertisements, promotion signs, etc.

The use of the Danish whole grain logo in marketing leaflets and similar implies the presence of logo-carrying products on the same side of the catalogue/leaflet where the overall whole grain message is conveyed, and it further implies the existence of the same logo-carrying products in the store.

The Danish whole grain logo must be used on the packaging of pre-packaged food products when you would also like to use the label in other types of marketing of these food products.

It is generally considered acceptable and within the rules for the Danish whole grain logo to use the logo on promotion signs outside of the shops, e.g. with the wording "Choose whole grain first when shopping". This presupposes that the store offers a certain amount of logo-carrying products. What is considered a sufficient amount of products must be evaluated specifically in each store.

Generically here, as well as in all other uses of the Danish whole grain logo, it is important that the marketing of the logo is not misleading to consumers.

2.4.4 Manufacturers

Manufacturers are companies that produce goods but are not involved in the retail business. Manufacturers sell goods to retailers, who then sell the goods on to consumers.

Manufacturers who market products jointly must both become members in order to use the logo on a branded product.

Manufacturers	Non-partners	Partners – can use the logo in the same way as non-partners and also as described below
	<ul style="list-style-type: none"> • May not use the logo for marketing their own products in collaboration with other manufacturers, even if they are whole grain partners. • May not use the logo on their own brands. 	<ul style="list-style-type: none"> • May use the logo on their own whole grain products that live up to the requirements behind the logo, even if the content may be delivered by a 3rd party. It is critical that the 3rd party (the non-whole grain partner) is not branded on the packaging.

2.4.5 Recipes

Recipes	Non-partners	Partners – can use the logo in the same way as non-partners and also as described below
	May not use the logo, but can use recipes that already bear the logo and which are publicly available.	May use the logo on recipes subject to nutrient calculation, if these live up to the logo's appliance guidelines.

The whole grain partners can use the logo in connection with development of own whole grain product recipes (in accordance with section 2.3) if the recipe is for a product that lives up to the requirements of the Danish whole grain logo. They can also use recipes that already bear the logo and which are publicly available, e.g. at www.fuldkorn.dk.

The whole grain partners can use the logo in connection with recipes for meals that are covered by group 26-31 in The Keyhole Label (see appendix 1), as long as the meal's content of cereal-based components lives up to the nutritional requirements for the use of the Danish whole grain logo. The meals should also live up to the nutritional requirements for similar meals in the joint Nordic Keyhole label requirements.

Non-partners can make use of recipes that already bear the logo and which are publicly available, for example at www.fuldkorn.dk but they cannot apply the whole grain logo to recipes they develop.

2.4.6 Pre-packed ready meals and similar

Pre-packed ready meals and similar	Non-partners	Partners – can use the logo in the same way as non-partners and also as described below
	Not allowed to use the Danish whole grain logo.	May use the logo on pre-packed ready meals that live up to the logo guidelines.

Pre-packaged ready-made dishes and so on that are covered by group 26-31 in The Keyhole Label can be labelled with the Danish whole grain logo as long as the meal's content of cereal based components lives up to the nutritional requirements for the use of the Danish whole grain logo - for example whole grain pasta in a ready-made lasagne. The meals should also live up to the nutritional requirements for similar meals in the joint Nordic Keyhole label requirements (appendix 1). For the rules on labelling see section 2.3.1

Chapter 3: What is and is not allowed in regard to claims for whole grain content and properties of products bearing the Danish whole grain logo

3.1 Special rules for nutrition and health claims as well as illness claims must be adhered to

The actual Danish whole grain logo is regarded as official dietary advice and not a nutritional or health claim, and the logo can therefore be used in connection with a specific product without the nutritional and health claim rules⁷ becoming applicable.

If, during the marketing of foodstuffs with the Danish whole grain logo, supplementary text and/or illustrations are used that directly or indirectly mention or point to correlations between nutrition and health-related properties, the text and/or illustrations being used must be subject to the regulation on nutrition and health claims. This means that only claims permitted by this regulation may be used. Since there are currently no approved health claims concerning the benefits of whole grain to your health, the marketing may not claim, in

⁷ The regulation on health claims: The European Parliament and Council regulation (EF) No. 1924/2006 of 20 December 2006 on nutritional and health claims for foodstuffs (with later amendments)

either general or specific terms, that whole grain is healthy. References to the prevention, treatment or cure of illnesses is generally prohibited, cf. the general marketing rules⁸

It is the companies that use the Danish whole grain logo in their marketing of food products that are responsible for ensuring that the products' content of whole grain and any supplementary text conform to the legislation on foodstuffs, including the rules of the regulation on nutrition and health claims.

Below, you can find some examples of health claims that do not conform to legislation:

- "Whole grain leads to a healthier heart". In this case, the products are connected to health and possibly illness prevention. This is not allowed in relation to or on the specific products/foods. Claims concerning illness prevention are generally prohibited. Claims concerning "heart health" are covered by the regulation on nutrition and health claims. There are currently no approved health claims concerning whole grain and heart health.
- "Whole grain in rye bread is the best". In this case, one product category is elevated above another. This does not comply with the use of the logo. The claim can also indicate a special nutritional or health-related property and is thus not in compliance with the regulation on nutrition and health claims.
- - "Statements such as "[Name of the health organisation - e.g. the Danish Heart Association] recommends for the population to eat whole grain" indicates that whole grain has a special, beneficial property in relation to, for example, (heart) health and is thus an unspecific health claim. The use of unspecific health claims is possible in accordance with the regulation on nutrition and health claims, provided that an approved health claim is being communicated. (However, as per January 2015 there are no such approved health claims for whole grain). Within the work of the Danish Whole Grain Partnership the mention of organisations' and authorities' name requires the organisations' or authorities' written consent (according to section 2.3).

It is possible to associate nutritional or health claims pertaining to constituent parts of grain products if the conditions for these health claims are adhered to.

Examples of approved health claims:

- "Fibre from rye contributes towards normal bowel function." This health claim may only be used for foods with a high content of fibre from rye, i.e. at least 6 g rye fibre per 100 g.
- Beta glucans contribute towards maintaining a normal blood cholesterol level." The claim may only be used for foods that contain at least 1 g of beta glucans from oats, oat bran, barley, or barley bran or from mixing these sources per quantified portion. For the health claims to be usable, the consumers must be informed that a beneficial effect is achieved by a daily intake of 3 g of beta glucans from oats, oat bran, barley, or barley bran or from a mixture of these beta glucans.
- "Fibre from wheat bran contributes towards increased bowel transit time in the intestines." This health claim may only be used for foods with a high content of wheat (bran) fibre i.e. at least 6 g wheat (bran) fibre per 100 g. For the health claim to be used, the consumer must be informed that the desired effect is achieved through a daily intake of at least 10 g of wheat (bran) fibre.

For additional guidelines concerning the rules for nutrition and health claims, see the regulation on nutrition and health claims.⁹

⁸ The foodstuff information regulation The European Parliament's and Council's regulation No. 1169/2011 of October 2011 on consumer information on foodstuffs.

⁹ Guideline No. 9450 of 27/06/2014 on health claim regulations.

Chapter 4: Design and technical requirements for use of the Danish whole grain logo

4.1 Requirements

The specific design and technical requirements for the use of the Danish whole grain logo will be sent in connection with receiving the logo.

4.2 Effective date

This revised version of the logo manual shall come into effect on 1 March 2015.

Contact address

The Danish Whole Grain secretariat
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H.C. Andersens Boulevard 18
1553 Copenhagen V
Tel.: 30 38 15 36/30 38 15 46
Email: rikn@di.dk

Appendix 1

Requirements for pre-prepared meals and similar that may use the Keyhole label

– according to product categories 26-31 in the appendix to the Danish executive order for the use of the Keyhole label:

Ready-made meals etc.	
<p>26. Ready-made meals that are meant to constitute a main meal, with protein, carbohydrates as well as vegetables, fruit or berries, and which are not covered by the food groups 27, 28, 29, 30, or 31.</p> <p>The meal must contain</p> <ul style="list-style-type: none"> - 400-750 kcal (1670-3140 kJ) per portion and - at least 28 g vegetables (not including potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g. <p>If the meal contains cereals, the cereal part must conform to the requirements for whole grain as indicated in the relevant food product group. If the meal includes gluten free pasta, this must conform to the requirements for fibre in food product group 10.</p>	<ul style="list-style-type: none"> - max 33% of the energy content may come from fat. - in meals containing fish with more than 10 % fat, the maximum energy level from fat is however 40%. - max 10% of the energy content may come from saturated fat. - added sugars max 3 g / 100g - salt – max 0.8 g / 100 g - however max 3.5 g salt per portion.
<p>27. Pierogi, pizza, and other savoury tarts containing</p> <ul style="list-style-type: none"> - at least 250 kcal (1050 kJ) per given portion, and - at least 28 g vegetables (not including potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g. <p>The cereal part of the product must contain at least 30% whole grain calculated as the cereals' dry matter content. However, for gluten free, the requirement for the cereal is 10%, calculated based on the cereals' dry matter</p>	<ul style="list-style-type: none"> - max 33% of the energy content may come from fat. - for products containing fish with more than 10 % fat, the energy content from fat may, however, not exceed 40% of the total energy content. - max 10% of the energy content may come from saturated fat. - added sugars max 3 g / 100g - salt – max 1.0 g / 100 g
<p>28. Open sandwiches, sandwiches, wraps, and similar products based on cereals that contain</p> <ul style="list-style-type: none"> - at least 150 kcal (630 kJ) per given portion, and - at least 25 g vegetables (not including potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g. <p>The cereal part of the product must contain at least 30% whole grain calculated as the cereals' dry matter content. However, for gluten free, the</p>	<ul style="list-style-type: none"> - max 33% of the energy content may come from fat. - for products that contain fish with more than 10% fat, the energy content from fat may, however, not exceed 40%. - max 10% of the energy content may come from saturated fat. - added sugars max 3 g / 100g - salt – max 0.9 g / 100 g

<p>requirement for the cereal is 10%, calculated based on the cereals' dry matter</p>	
<p>29. Soups with fish or meat (finished products and products after preparation that follow the producer's instructions) that contain</p> <ul style="list-style-type: none"> - at least 100 kcal (420 kJ) per given portion, and - at least 28 g vegetables (not including potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g. <p>If the meal contains cereals, the cereal part must conform to the requirement for whole grain as indicated in the relevant food product group. If the meal includes gluten free pasta, this must conform to the requirements for fibre in food product group 10.</p>	<ul style="list-style-type: none"> - max 33% of the energy content may come from fat. - for products that contain fish with more than 10% fat, the energy content from fat may, however, not exceed 40% of the product's total energy content. - added sugars max 3 g / 100g - salt – max 0.8 g / 100 g - however max 2.5 g salt per portion.
<p>30. Soups without fish or meat (finished products and products after preparation that follow the producer's instructions) that contain</p> <ul style="list-style-type: none"> - at least 100 kcal (420 kJ) per given portion, and - at least 50 g vegetables (not including potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g. <p>If the meal contains cereals, the cereal part must conform to the requirement for whole grain as indicated in the relevant food product group. If the meal includes gluten free pasta, this must conform to the requirements for fibre in food product group 10.</p>	<ul style="list-style-type: none"> - max 33% of the energy content may come from fat. - added sugars max 3 g / 100g - salt – max 0.8 g / 100 g - however max 2.5 g salt per portion.
<p>31. Ready-made meals that are not meant to constitute a main meal and which are not covered by food groups 26, 27, 28, or 29.</p> <p>The meal must contain:</p> <ul style="list-style-type: none"> - at least 100 kcal (420 kJ) per given portion, and - at least 50 g vegetables (not including potatoes), legumes (except peanuts), root vegetables, or fruit and berries per 100 g. <p>If the meal contains cereals, the cereal part must conform to the requirement for whole grain as indicated in the relevant food product group. If the meal includes gluten free pasta, this must conform to the requirements for fibre in food product group 10.</p>	<ul style="list-style-type: none"> - max 33% of the energy content may come from fat. - in meals containing fish with more than 10 % fat, the maximum energy level from fat is however 40%. - max 10% of the energy content may come from saturated fat. - added sugars max 3 g / 100g - salt – max 0.8 g / 100 g - however max 2.5 g salt per portion.

Appendix 2

Calculating the whole grain content of bread

There are several criteria that bread, baked by yourself, must meet to be granted the Danish whole grain logo. There are criteria for the content of salt, sugar, fat, and fibre – the content of these nutrients can be calculated through common nutritional calculation. But besides this, there is a specific criterion for the whole grain content of bread. The whole grain content of bread must be calculated both as dried matter, and as QUID (quantitative ingredient declarations). In this appendix we provide the calculation formula and examples of calculations for both criteria.

REMEMBER when using the whole grain logo

- Bread must contain a minimum of 50% whole grain calculated as dried matter and 30% calculated as QUID.
- The requirements for bread in order to conform to the Danish whole grain logo are: salt (max 1 g/100 g), sugars (max 5 g/100 g), fat (max 7 g/100 g), and dietary fibre (at least 5 g/100 g).
- Read more about these criteria in our website www.fuldkorn.dk.
- You can read more in the educational material for bakers, "Ask Me About Whole Grain." Contact Rikke Iben Neess at rikn@di.dk

Example (this is a hypothetical recipe, in order to illustrate the calculation process).

Recipe:

351 g	Whole wheat flour
50 g	Sunflower seeds
200 g	Flour
300 g	Water
50 g	Yeast
9 g	Salt
40 g	Oil
1000 g	Finished dough total

Weight of bread after baking = 900 g (due to water evaporation during the baking process).
Reduction is based on a standard evaporation of 10%.

Formula for QUID calculation

$$\frac{\text{Whole grain ingredient}_1 + \text{Whole grain ingredient}_2 \text{ etc.} \times 100}{\text{Weight of bread after baking}} = \text{XQUID \% whole grain}$$

In other words, QUID is the relation between the weight of all whole grain ingredients and the weight of the final baked bread expressed as a percentage.

The criterion for use of the Danish whole grain logo is a minimum content of 30% QUID.

As in the above example:

$$\frac{351 \text{ g (whole grain wheat flour)}}{900 \text{ g (weight of bread after baking)}} \times 100 = 39\% \text{ whole grain}$$



Formula for dried matter calculation

The content of whole grain calculated as the product's dried matter is the weight of the dried matter provided by all whole grain ingredients expressed as a percentage of the total weight of dried matter in the final product.

The quantity of dried matter is achieved through average values based on either an analysis or a calculation from known or factual average values for the ingredients in the product. The calculation can also be made on the basis of commonly determined and accepted data for the ingredients. In the following example we look at how to calculate the whole grain content using commonly accepted data, i.e. table values.

Flour and cereal products are main ingredients in bread. In order to calculate the whole grain content of bread based on its dried matter, a standard value of 15% for flour's and cereals' water content can be applied (as long as the water content does not exceed 15%). In other words, these ingredients have a dried matter value of 85%. The bread's remaining ingredients have other dried matter values. Seeds, for instance, have lower water content.

When calculating the whole grain content of bread based on the dry matter, you can use the dry matter value of 85% for most flour and cereal products, provided that the water content is max 15%. If you are in doubt as to whether the ingredients fall within flour and cereal products, you can obtain the dry matter values either as table

values at www.foodcomp.dk or from the producer. In the standard value tables at www.foodcomp.dk the water content is given, and the ingredients' dried matter is therefore = 100 minus the given water content value presented in the table.

When a recipe includes seeds like sunflower seeds, pumpkin seeds or linseeds, remember that these ingredients have other dried matter values. For example, www.foodcomp.dk indicates a water content value of 3.7 for sunflower seeds, so these seeds have a dried matter content of $100 - 3.7 = 96.3$. Similarly, you have to take into account that vegetables such as potatoes and carrots also have other dry matter values. These dry matter values can be obtained from the producer or as table values - cf. above.

It is also important to remember that basal ingredients like salt, yeast, and fat are also part of the calculations. Therefore, their dry matter values must also be taken into account.

Formula for whole grain content calculated as dried matter:

$$\frac{\text{Whole grain ingredients} \times 0.85}{(\text{Whole grain ingredients} + \text{other flour and cereal ingredients}) \times 0.85 + \text{all other ingredients multiplied by their dried matter values}} \times 100 = X_{\text{dry matter \% whole grain}}$$

The criterion for the Danish whole grain logo is a minimum of 50% calculated as dried matter.

As in the above example:

$$\frac{(351 \text{ g whole grain wheat flour}) \times 0.85}{(351 \text{ g whole grain wheat flour} + 200 \text{ g wheat flour}) \times 0.85 + (50 \text{ g sunflower seeds} \times \text{dry matter for sunflower seeds}) + (50 \text{ g yeast} \times \text{dry matter value for yeast}) + (9 \text{ g salt} \times \text{dry matter value for salt}) + (40 \text{ g oil} \times \text{dry matter value for oil})} \times 100 = X_{\text{dry matter \% whole grain}}$$

If the hypothetical bread contains, for instance, potatoes, the formula would be:

$$\frac{(351 \text{ g whole grain wheat flour}) \times 0.85}{(351 \text{ g whole grain wheat flour} + 200 \text{ g wheat flour}) \times 0.85 + (50 \text{ g sunflower seeds} \times \text{dry matter for sunflower seeds}) + (50 \text{ g yeast} \times \text{dry matter value for yeast}) + (9 \text{ g salt} \times \text{dry matter value for salt}) + (40 \text{ g oil} \times \text{dry matter value for oil}) + (100 \text{ g potatoes} \times \text{dry matter value for potatoes})} \times 100 = X_{\text{dry matter \% whole grain}}$$