CALORIE LABELING IN
FOOD SERVICE ESTABLISHMENTS

REQUIREMENTS AND GUIDELINES

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Introduction

Obesity is a global public health concern leading to increased risk of diabetes, heart disease, stroke, some cancers, and other health problems among children and adults alike. Up to 2-3 fold increase has been noted in the prevalence of overweight and obesity in the UAE between 1989 and 2017 and consumption of foods with poor nutritional value has been identified as a major contributor to the growing obesity epidemic.

Dubai Municipality has undertaken several programs and initiatives that would help residents pursue a healthy lifestyle and the latest of the initiatives is the introduction of calorie labeling in food service businesses. Over 1 billion food decisions are made each year by people who eat from Dubai’s food outlets and calorie labeling will allow individual consumers to make informed decisions about the foods they purchase. Better availability of nutritious food would mean that food service businesses can positively impact health of both residents as well as the several million tourists who visit Dubai each year.

The Food Permits and Applied Nutrition Section will be supporting the food businesses in this mission to improve the nutritional quality of the foods they produce and this guideline is the first step towards helping restaurants and similar food establishments comply with the new requirements. We will be providing more support in the future by providing an online platform to calculate nutritional values based on the ingredients.
Background

In line with both UAE's and Dubai Government’s vision for a healthier and more sustainable future, Dubai Municipality issued a circular on May 9, 2019, mandating food service establishments to declare the calorie content of their menu items. The new announcement was built on previous programs in schools and the Eat Healthy, Live Healthy initiative launched in 2016.

This document provides guidance for food service establishments to label calorie information on the menu. It explains the requirement and the procedure to calculate calories. It also addresses concerns that may rise regarding the implementation of calorie labeling.

Furthermore, this guide may be revised from time to time to address any changes in the policy or procedures. Always download the latest version from Dubai Municipality website www.dm.gov.ae.
Definition of Terms

Calorie Declaration or Labeling: Display of the total amount of calories of a food or menu item, including any add-ons such as garnishing, dressing and other condiments or meal component in the case of combo meals, on the menu, menu board and/or display label.

Combination meals: Standard menu items that consist of more than one food item. Some combination meals may include a variable menu item.

Food Calorie: A unit of energy provided by food.

Foods on Display: Type of foods that the consumer can see before selecting.

Food Service Establishment: Any establishment or operation where food is prepared and/or served directly for consumption by consumers. This includes but is not limited to restaurants (stand-alone, chain and hotel), cafés, cafeterias, canteens, coffee shops, bakeries, pastry shops, ice cream shops, juice bars, catering facilities, supermarkets, convenience stores, and non-fixed food service operations like food stands/kiosks, food trucks, food carts and food trolleys.

Kilocalorie (commonly referred to as “Calorie”): A unit of energy of one thousand calories. It is the amount of heat required to raise the temperature of one kilogram of water by one degree Celsius.

Menu: A list of food and/or beverages offered to consumers. This includes paper menus, electronic menus, menu boards, drive-thru menus, online menus or menu applications.

Multiple Serving Menu Items: Standard menu items that come in multiple servings which may be sold whole or per individual unit.

Non-prepackaged Food: Food that is prepacked for direct sale, food that is loose, and food that is packaged at the request of the consumer.

Standard Menu Items: Foods that are routinely included on a menu or menu board or routinely offered as food on display.

Variable Menu Items: Standard menu items which come in different flavors, varieties, or combinations that are listed as single menu items (e.g. smoothies).

Variable Menu Items Offered with the Option of Add-Ons or Adding Toppings: Standard menu items that are offered with various add-ons or toppings.
1. Calorie Labeling Requirement, 2019

The External Circular issued by Dubai Municipality dated 09/05/2019, titled “Declaration of Calories on Menu Cards in Dubai,” requires all food service establishments to provide calorie labeling of all the foods items in the menu. Calorie information must be provided along with the name of the food items listed in print as well as the digital menu cards in a clear and legible manner.
2. Scope

2.1 Calorie labeling requirements apply to all non-prepackaged foods sold in food service businesses such as but not limited to:

- Restaurants
- Cafeterias
- Cafés and coffee shops
- Bakeries with dine-in and/or display
- Supermarkets and departmental stores with food service counters for hot and cold foods
- Mobile vendors and food kiosks
- Ice cream shops
- Vending machines
- Food carts and food trollies
- Catering facilities that offer direct sales to consumers
- Food counters inside petrol stations
- Workplace cafeterias, work accommodation and university residence canteens
- Hospital canteens and other food service establishments inside hospitals
- School and college/university canteens
- Food counters inside recreational facilities such as cinemas and sports complex
- Clubs

- All foods listed on the menu, in print, digital or online, menu board and other materials.
- Any food sold, displayed or listed in the establishment that is provided to consumers for ordering.

2.1 This requirement **does not apply** to:

- Products manufactured and packaged commercially where other national and local food labeling standards apply.
- Packaged foods registered in the ZAD system (formerly FIRS) and for which label assessment has been completed.
3. Objectives of Calorie Labeling

The main objectives of the calorie labeling requirement are:

- To provide calorie information at the point of sale to consumers in Dubai and empower them to make informed food choices.
- To encourage food service businesses to include in the menu more food options with lower calorie content.
- To promote among consumers the consumption of foods with lower calories and better health outcomes.

4. Calorie Assessment of Foods

The new Calorie Labeling requirement requires food establishments to do calorie assessment of foods based on the quantity of ingredients and serving size.

Calorie information can be obtained using any of the following methods:

4.1 Obtained from the “Generic Value” for foods (Generic Database) provided on the Foodwatch platform *

4.2 Computed using the “Recipe Validation” tool provided on the Foodwatch platform **

4.3 Computed using nutrition software, any food service operations software with nutritional analysis feature or any recognized software programs.

4.4 Calculated manually using a recognized food/nutrient database such as USDA. An excel sheet template that can be used to do the calculation has been provided in the Appendix.

*Generic Value information will be available on the Foodwatch platform by June 2019

** Recipe Validation tool will be available on the Foodwatch platform from August 2019

If you are using a specific program that is not listed in the appendix, provide the details to nutrition@dm.gov.ae prior to using the software or the method.

It is important to note that Dubai Municipality does not require laboratory tests for the calculation of calories.
5. General Requirements for Printing Calorie Information

Calories are printed in two different ways, depending on the method of obtaining the calorie information.

5.1 Plain text printing

e.g. Beef Burger  30 dhs  227 Cal

When the calorie information has been obtained from Foodwatch Generic Database, analyzed with the use of nutrition software, or computed manually with the use of a food/nutrient database, the labeling must be provided as a plain text.

5.2 Printing information in a circular text box

e.g. Beef Burger  30 dhs  227 Cal

Nutritional information analyzed and validated through the Foodwatch Nutrition platform should be provided in a circular text box. This validation includes comprehensive recipe-based analysis with all ingredients.

5.3 A copy of the menu or display contents must be sent to support@foodwatch.ae prior to printing/display.

5.4 The food establishment must provide a Nutrition Information Report that lists the foods, shows the method of calculation and values and cites the references, which should be made available to the authorized officers from Dubai Municipality when necessary. *(A template of the report is furnished in the Appendix.)*

6. Declaration of Daily Calorie Information

Information about the total daily calorie allowance must be mentioned on the menu or menu board in this manner, “2000 calories a day is used for general nutrition advice for youth and adults (ages 13 and older) while 1500 calories for children (ages 4 to 12), but individual needs vary.”

However, the statement about the additional nutrition information will be optional, depending on the food service establishment who has full nutrition information of their food/menu items. The statement will be as follows: “Additional nutrition information is available upon request.”
7. Labeling Rules

Calorie labeling may be carried out in various ways depending on the establishment’s method of displaying the information of their food or menu items, regardless of whether it is from a regular/standard or seasonal menu, for consumers to choose and/or order such as printed, digital or online menu, in-store or drive-thru menu board, display label in print or electronically. Below are the labeling rules that should be observed and applied accordingly. *(More examples of calorie labeling on the menu are illustrated in the Appendix.)*

7.1 **Standard Menu Items**

When declaring calories on menus or menu boards, food establishments are required to:

7.1.1 Display the calories adjacent to the name or price of the menu item in a type size no smaller than that of the name or price of the menu item.

7.1.2 Identify the calories with the term “Cal” or “Calories.”

7.1.3 If an optional column format is used, the term “Calories” is placed as a heading above the column.

7.2 **Variable Menu Items**

7.2.1 If the menu or menu board lists each variety, then declare the calories for each variety.

7.2.2 If the menu or menu board lists two options for the variable menu item, then declare the calories for each option, with a slash between the two declarations (e.g., Cal 400/550).

7.2.3 If the menu or menu board lists more than two options for a variable menu item, then declare the calories as a range (e.g., Cal 850-1150).

7.3 **Combination Meals**

Calories may be declared using the suitable condition mentioned for variable menu items depending on the combination.
7.4 **Multiple Serving Menu Items**

For multi-serving foods, list calories:

7.4.1 Per individual unit (e.g., slice of pizza) if the total number of units is included and the menu item is normally prepared and served in individual units or portions (e.g., Whole pizza served by the slice (e.g., 100 Cal/slice, 8 slices per pizza).

7.4.2 If the standard menu item is not normally prepared and served in individual units or portions, the calories must be declared for the entire standard menu as well as providing the suggested number of servings and the number of calories per serving (e.g., 800 Cal/Nachos Dip Dish, 4 servings, 200 Cal/serving).

7.5 **Variable Menu Items Offered with the Option of Add-Ons or Adding Toppings**

7.5.1 Declare calories separately for each add-on or topping listed on the menu or menu board and indicate that the calories for each add-on or topping are added to the calories in the basic preparation of the menu item.

7.5.2 If add-ons or toppings have the same calorie declarations, use a single calorie declaration and specify that the calorie amount listed is the amount for each individual add-on or topping.

7.5.3 Declare calories for each add-on or topping listed on the menu for each size of the menu item.

7.5.4 If there are only two sizes of the menu item, declare calories for each add-on or topping using a slash (e.g., adds 150/250 Cal); or if there are more than two sizes, declare calories as a range (e.g., adds 100-250 Cal).

7.6 **Foods on Display**

Calorie information for foods on display, including grab-and-go foods, must be on:

7.6.1 A sign adjacent to and clearly associated with the food;

7.6.2 A sign attached to the sneeze guard; or

7.6.3 A sign or placard listing the calorie declaration for several food items along with the names of the food items, so long as the sign or placard is located where a customer can see the name, calorie declaration, and serving size or unit while making a selection.
7.7 **Beverages, Not-Self-Service**

7.7.1 Declare calories based on the full volume of the cup as served without ice; or

7.7.2 Declare calories based on standard beverage fill or standard ice fill, if the establishment dispenses and offers for sale a standard beverage fill or dispenses a standard ice fill.
FREQUENTLY ASKED QUESTIONS

1. Are the food establishments required to buy a software for the calculation of calories?
   Food establishments are not required to buy any software for the calculation of calories. Either the Foodwatch Generic Data base or Foodwatch Nutrition Validation Software can be used for calculation of calories. Foodwatch Generic Database will allow establishments to find the calories of common foods in Dubai and the Validation software will facilitate a full recipe analysis. Read section 4 for more details.

2. Is laboratory analysis required for the estimation of calories?
   No, laboratory tests are not required. Calculation of calories can be done using any of the methods listed under section 4.

3. Are the restaurants required to hire a nutritionist for the computation of calories?
   Calories can be calculated by any person trained to use one of the calories-calculation programs listed in the appendix. The use of such programs is simple and only requires the product names, ingredients and their quantities, and the serving size.
   You can take the services of a qualified nutritionist or dietician if necessary.

4. What are the details required to calculate the calories?
   To calculate the calories, the details required are the following:
   - Product name
   - Ingredients with their specifications such as:
     - raw/fresh/dry or cooked or drained
     - canned with oil or water or syrup
     - part of the meat or poultry
     - lean part or with fat or skin
     - with or without bone or head or shells
   - Quantity or weight of ingredients in grams
   - Serving size in grams
5. How can calories be computed or declared?
   Refer to section 4.

6. Where is the calorie information placed?
   Refer to section 7.

7. Is it possible to provide the calorie information to consumers orally?
   No. Calorie information has to be placed on the menu, menu board or display label.

8. Is there any standard format for calorie labeling?
   Refer to section 7.1.

9. How is calorie labeling done for a menu item that comes in different flavors or combination like smoothies?
   Refer to section 7.2.

10. How is calorie labeling done for a menu item that is not sold in individual portion sizes like pizza?
    Refer to section 7.4.

11. How is calorie labeling done for a menu item that is sold with add-ons (like pizza or blended beverages)?
    Refer to section 7.5.

12. How is calorie labeling done for foods on display or in pastry case?
    Refer to section 7.6.

13. How is calorie labeling done for beverages with a standard fill?
    Refer to section 7.7.
14. Do foods packed and sold on the retail shelves of the food service establishment covered by the regulation?
Refer to section 2.

15. Does the labeling rule apply for a party platter with different type and quantity of sandwich/sub selections on various choices of bread as per the customer's order?
Calorie labeling should be declared for each type of sandwich but the range of calories of possible combinations for each platter should also be mentioned.

16. How is calorie labeling done for foods packed and sold in supermarkets or convenience stores from catering facilities?
If it is not a commercially manufactured and packaged item or an item registered under ZAD system, the labeling rule for foods on display (section 7.6) applies.

17. Do we need to declare the calorie on marketing materials of any food items?
If the marketing material has a price and/or provides the consumer an immediate way to order the advertised food, calories have to be declared as well.

18. Do calories need to be declared on direct mail advertisements and coupon mailers?
Calories only need to be displayed if they list prices for food/menu items or if they provide a method to place an order for delivery or take away.

19. Are social media advertisements captured by the regulation?
Social media advertisements that list prices for food/menu items and from which customers can order delivery or take away are captured by the regulation. Additionally, if a social media advertisement lists food/menu items that a person can order for delivery or takeaway ordering and provides a method to place an order (e.g. links to an order form or website), and then it is captured by the regulation.
20. **Do calories need to be displayed on in-store advertisements?**

Calories are to be displayed on each menu on which the food/menu item is listed or depicted (image only) at the food service establishment, including an advertisement (other than a billboard, radio or television advertisement) and a promotional flyer.

Online menus, menu applications, advertisements and promotional flyers that are distributed or available outside of the establishment are exempt from posting calories if they either do not list prices for food/menu items or do not list food/menu items that are available for takeaway or delivery ordering and do not provide a method to place an order.

Online menus, menu applications, advertisements and promotional flyers that are distributed or available inside the premises can be used to order food or drink items as they can easily be referred to or pointed at by a customer when placing an order.

21. **Do calories need to be shown for advertisements outside the food service establishment or outward-facing window signs?**

If a food service establishment lists or depicts a food/menu item on a menu that is distributed or available outside the food service establishment, calories are to be displayed on that menu. This also includes online menu or a menu application, an advertisement (other than a billboard, radio or television advertisement) and, a promotional flyer.

22. **Do calories need to be displayed on self-order kiosks if they are already listed on the menu boards?**

The regulation defines the term ‘menu’ to include paper menus, electronic menus, menu boards, drive-thru menus, online menus or menu applications.

23. **Do calories need to be shown on a loyalty app if food is offered for redemption?**

Food service establishments are required to display the calories for all their food/menu items, whether it is free of cost or with a price, as long as the customer has to make a choice.
24. Do calories need to be posted on catering menus?

Calorie information must be displayed on each menu on which a food item/menu is listed or depicted at a food service establishment as well as on menus that are distributed or available outside the food service establishment that list or depict a food/menu item. Therefore, catering menus would be included if they list or depict a food/menu item sold or offered for sale by a food service establishment.
APPENDIX

1. Template of Nutrition Report

<table>
<thead>
<tr>
<th>Name of Food</th>
<th>Method of Calculation</th>
<th>Serving Size</th>
<th>Total Calories</th>
<th>Reference</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mutton Biryani</td>
<td>nutrition software</td>
<td>1</td>
<td>427</td>
<td>Foodwatch Generic Database</td>
</tr>
<tr>
<td>Butter Chicken</td>
<td>nutrition software</td>
<td>1</td>
<td>513</td>
<td>Foodwatch Recipe Validation</td>
</tr>
</tbody>
</table>

Name of the software/program used: Foodwatch
Name of the consultant, if used: none

2. Recommended Food and Nutrient Database

Below are recommended nutrient databases that can be used with manual calculation.

- Food Search by US Department of Agriculture (USDA)
  [https://ndb.nal.usda.gov/ndb/nutrients/index](https://ndb.nal.usda.gov/ndb/nutrients/index)
- Food Calorie Calculator from the Calorie Control Council
3. Template for Manual Computation of Calories

To calculate the calories using the Excel Sheet provided by DM, do the following steps:

- Download a copy of a recognized nutrient database like USDA or open the online version.
- Get a copy of the Excel sheet entitled “DM Nutritional Analysis Format.” (It is illustrated below.)
- Prepare the standardized recipe in grams. A batch size or serving size (individual portion) recipe can be utilized.
- Copy and paste the recipe’s ingredients and its quantity into the excel sheet.
- Put the number of servings.
- Search the nutrient database for the calorie content of each ingredient with its corresponding quantity.
- Place the weight of the Serving Size.

An example of Roasted Vegetable Lasagna calculation

<table>
<thead>
<tr>
<th>Ingredients</th>
<th>Unit</th>
<th>Quantity</th>
<th>Kilocalories</th>
</tr>
</thead>
<tbody>
<tr>
<td>TOMATO SAUCE</td>
<td>gram</td>
<td>80</td>
<td>34.00</td>
</tr>
<tr>
<td>BECHAMEL SAUCE</td>
<td>gram</td>
<td>80</td>
<td>118.00</td>
</tr>
<tr>
<td>PASTA LASAGNA SHEET</td>
<td>gram</td>
<td>35</td>
<td>130.00</td>
</tr>
<tr>
<td>MUSHROOM WHITE BUTTON</td>
<td>gram</td>
<td>80</td>
<td>18.00</td>
</tr>
<tr>
<td>BABY MARROW</td>
<td>gram</td>
<td>50</td>
<td>11.00</td>
</tr>
<tr>
<td>CARROT</td>
<td>gram</td>
<td>25</td>
<td>10.00</td>
</tr>
<tr>
<td>CAPSICUM</td>
<td>gram</td>
<td>15</td>
<td>3.00</td>
</tr>
<tr>
<td>ONION</td>
<td>gram</td>
<td>20</td>
<td>8.00</td>
</tr>
<tr>
<td>MOZZARELLA</td>
<td>gram</td>
<td>15</td>
<td>45.00</td>
</tr>
<tr>
<td>OLIVE OIL</td>
<td>gram</td>
<td>1</td>
<td>9.00</td>
</tr>
<tr>
<td>PARMESAN</td>
<td>gram</td>
<td>3</td>
<td>13.00</td>
</tr>
<tr>
<td>TOTAL QUANTITY</td>
<td>gram</td>
<td>404</td>
<td>399.00</td>
</tr>
</tbody>
</table>

Roasted Vegetable Lasagna | Serving Size (grams) | Kilocalories |
--------------------------|----------------------|--------------|
               | 404                  | 399          |
4. Examples of Calorie Labeling on a Menu

<table>
<thead>
<tr>
<th>Menu</th>
<th>Calories</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grilled Chicken Sandwich</td>
<td>380</td>
</tr>
<tr>
<td>Fried Chicken Sandwich</td>
<td>570</td>
</tr>
<tr>
<td>Sparkling Water</td>
<td>0</td>
</tr>
<tr>
<td>Soft Drink</td>
<td>250</td>
</tr>
</tbody>
</table>

![Menu Image]

![Menu Image]

![Menu Image]