



ITC LIMITED FOODS DIVISION'S NUTRITION PROFILING SYSTEM

Introduction

ITC as the leading Indian FMCG company has always strived to deliver nutritious & tasteful product options for the Indian consumers, based on many confounding factors of varied taste preferences, targeted nutritional needs, affordability amongst many others. We believe that all foods, in right portions have a unique & critical place in a diversified, balanced diet. Consumers should be provided with a variety of food products along with appropriate nutritional information to make informed choices. At ITC, it has also been an endeavour to support the National nutritional and health priorities emanating out of India's commitments towards the Mission Poshan 2.0 and UN Sustainable Development Goals (SDG) for 2030. Under the thought leadership of "Nutrition For Nation", ITC Foods Division has developed a 4-pillar model that uniquely combines the strategic commitments to deliver on its nutrition strategy of "Help India Eat Better". This is also deeply embedded into our core commercial strategy. These pillars enable development of the value-added product portfolio, creating a sustainable food ecosystem, supporting community based interventions and improving employee and consumer nutrition quotient.

In 2018, ITC Foods Division embarked on the journey to support FSSAI's Eat Right India movement with a pledge to reduce the nutrients of concern in certain appropriate categories and has continued to progress on the same, while still delivering on the taste profile of the products. ITC has successfully achieved the first phase of reduction targets for nutrients of concern for the year 2021, and will continue to provide nutritious choices to delight consumers. While it is critical to reduce nutrients of concern, ITC also recognizes the importance of enhancing positive attributes of products and in alignment with this ideology, ITC commits on below mentioned actions*, to be achieved by 2025.

1. To provide Goodness of Protein from 90% of the current portfolio.
2. To provide Goodness of Fibre from 75% of the current portfolio.
3. To double the % of product portfolio that provides Goodness of Iron.
4. To keep per serve calorie delivery below 100 kcal for chocolates & confectionary.
5. To keep per serve calorie delivery below 100 kcal for products targeted to children.
6. To increase the product portfolio with goodness of whole grains, nuts, legumes, fruits & vegetable by 50%.

*basis volume sales, unless specified

These commitments will continue to support ITC's larger belief to deliver healthier food choices. This will also help business leaders to make informed decisions regarding product formulations.

There are wide variety of Nutrient Profiling Systems available globally, like High Fat Sugar Salt (HFSS), used in the United Kingdom; NutriScore (NS), used in European countries; Health Star Rating (HSR), used in Australia and New Zealand; Chile warning logo; Healthy Choice Symbol, used in Singapore etc. While each system has its own positive & negative points, none of them are perfect. Also, since they are based on their own country's specific dietary practices and associated health concerns – they cannot be used directly. Hence there was a need to develop one which is applicable and relevant to India's nutrition challenges. Moreover, India being a vast country with very diverse food patterns, food availability and accessibility, it was imperative to develop a profiling system which could encompass this vast diversity.

As a next step to this journey and looking at India's unique food diversity, it became essential to create a system of monitoring and profiling of food product's healthiness, based on mapping of the sustainability of the entire value chain along with targeted nutritional needs. The profiling system thus developed is aligned with many global and national benchmarks which are based on scientifically sound principles of a balanced diet. It encourages formulation & reformulation of products that are science-based and thereby enable consumers to adopt them in their daily diets as a healthier, affordable and sustainable food option.

The profiling methodology acknowledges the importance of enhancing diet diversity, enrichment and positive nutrition by value addition via macro & micro nutrients (critical vectors of fortification), nuts, legumes, vegetables, pulses, millets, dairy etc., along with management of reduction of nutrients of concern like added sugars, sodium etc in all appropriate product categories. The portfolio, thus developed, should also address the special needs of specific target groups like children, adolescents, pregnant women and lactating mothers, geriatric population and vulnerable groups suffering from any specific health issues like undernutrition, stunting, wasting, anaemia and non-communicable diseases, which are key to providing holistic nutrition to the community at large.

ITC Nutrition Profiling system has been designed keeping in mind the public health needs, dietary patterns, dietary recommendations such as those issued by World Health Organization (WHO), ICMR-NIN, and FSSAI, while including the scientific rationales from other globally accepted profiling systems. This Profiling system enables ITC to continuously map & feed into its nutrition strategy to develop a product portfolio in line to its commitment of providing sustainable, affordable and accessible food choices.

A. NUTRITION PROFILING SYSTEM PRINCIPLES

1. All products in appropriate portions and based on their role in overall diet, can be enjoyed as part of diversified balanced diet.

Nutrition profiling system uses a specific assessment criterion for each food product, depending upon its role in everyday diet & portion guidance. For example, in an Indian context, flours, pulses, vegetarian/non-vegetarian gravies form core part of the main meals hence, they will be kept as part of the main meal; while a noodle preparation forms part of a light meal hence will be categorized accordingly. Similarly, accompaniments like papad, chutney, pickles which are an integral part of Indian thali, will also be built into the profiling system.

2. Consideration of Nutrients of concerns for their reductions.

Keeping in mind the local dietary recommendations as well as health concerns, the profiling system has mapped each of the product category for their contribution towards 5 *nutrients to reduce* namely: -

1. Energy
2. Added Sugars
3. Saturated Fat
4. Trans Fat
5. Sodium

3. **Consideration of nutrients/ingredients to encourage for their enhancement, which contribute positively in an overall diet.**

Indians despite many interventions continue to be deficient in some very critical nutrients like Protein, which is essential at all stages of life. Fibre is also another vital nutrient that is missing in the daily diets, hence in order to supplement the current food options, it is important to include nutrients which provide health benefits. The profiling system therefore assesses for value addition with essential nutrients like Fibre, Protein, Vitamins (Vitamin A, Vitamin D, Vitamin B12, Folic acid, Vitamin C, B- vitamins etc), Minerals (Iodine, Iron, Magnesium, Zinc etc) and wholesome ingredients (whole grains, pulses & legumes, dairy, fruits, vegetables, nuts, millets etc) which when consumed in appropriate portions contribute positively to overall health & well-being. This also includes products that are fortified as per FSSR Regulations (+F). In addition, to above considerations, special focus has been placed on not including Treat Category for this particular criteria.

B. SCOPE OF THE PROFILING SYSTEM

- I. Inclusion:
 - a) All products sold in India.
 - b) Pre- Packaged foods sold via Foods Business Division only.
- II. Exclusion: Certain product categories can be considered out of scope like: -
 - a) Semi-finished products/products intermediary to a final dish or a product.
 - b) Products not meant for direct sale to consumers.
 - c) Products that do not carry Nutrition Information Panel (NIP).
 - d) Products that have inherently negligible nutritional contribution in context of a balanced diet.

C. NUTRITION PROFILING THRESHOLDS & CRITERIA

1. Product categorization is done basis the placement of various food products as a part of diversified balanced daily diet. The products are classified under categories which represent an essential component of days' diet like main meal dishes, light meals, snacks, treats, accompaniments etc.
2. Thresholds are classified under 2 broad heads- Nutrients to reduce and Nutrients &/or Ingredients to encourage. Each of these heads will have their own thresholds based on applicable National & International regulatory & nutritional guidelines.
 - a. For Nutrients to reduce: 5 nutrients will be captured on per serve basis – Energy, Added Sugars, Saturated Fat, Trans Fat and Sodium, across all categories.
 - b. For Nutrients &/or Ingredients to encourage: certain value adding components have been considered basis their healthful proposition in a balanced diet, across all categories (except treats).
3. Thresholds have been mapped separately for Adults and Children (in case of nutrients to reduce).
4. Each Product would be mapped for their compliance to the profiling system basis their overall adherence to the applicable thresholds & category. A product will be compliant if it's as sold value, is within threshold for all nutrients of concern & have at least one positive nutrient &/or ingredient -except in treats.

5. Products will be continuously evaluated to enhance their nutrition profile by appropriate means ex. increasing value added ingredients & nutrients and reducing the nutrients of concern.

TABLE 1: DEFINITION OF THE PRODUCT CATEGORIES AND DESCRIPTION

PRODUCT CATEGORIES	DEFINITION	DESCRIPTION
Main Meal dishes	Products that are consumed as part of the main meal (breakfast/lunch/dinner).	Flours, Dals, Pulses, Biryani, Pongal, Pulao, Ready to Eat dishes etc
Fresh Dairy (No added Sugar/Salt)	Milk and/ or products based primarily on milk with no added sugar/salt.	Milk, Paneer, plain yogurt etc.
Light Meal Dishes	Products consumed either in between main meals or as small meals. Their contribution towards energy is more than a snack, however less than the main meal.	Noodles, Pasta, Vermicelli, Poha, upma, RTE idli- sambhar, frozen snacks etc.
Snacks (savory)	Products that have a smaller serving size and have a savoury flavour. These are generally consumed in between main meals.	Namkeen, chips, nachos, puffs savoury Biscuits etc
Snacks (sweet)	Products that has a smaller serving size and have a sweet flavour. These are generally consumed in between main meals.	Biscuits, cakes & Cookies, sweet flavoured curds like Doi's etc.
Beverages (sweet, salty, Sweet & Salty)	Products that are generally consumed in-between main meals and are generally consumed in liquid form.	RTD-Nectars, Fruit Beverages, cold coffee, premixes etc. Products made with a base of water, milk, cereals, pulses, yogurt, fruits, vegetables or a mix of above.
Cooking aids	Products that are used in the preparation of main meal dishes.	Fruit, vegetable, nuts-based gravies, purees, Cooking Pastes, etc
Accompaniments	Products that complement a meal/snack/light meal and does not have major contribution of energy in a daily diet.	Chutneys, Conserves, Papad etc
Treats	Products that are generally sweet in taste and are usually consumed at the end of a meal or as an in-between snack.	Chocolates, Sweet Premixes, Confectionery, Dairy Sweet, Instant sweet mixes etc

TABLE 2: NUTRIENTS/INGREDIENTS FORMING THE BASIS OF PROFILING SYSTEM

INGREDIENTS &/OR NUTRIENTS TO BE ENCOURAGED (EXAMPLES)	NUTRIENTS TO BE REDUCED
<ul style="list-style-type: none"> ▪ Protein ▪ Fibre ▪ Fruits & Vegetables ▪ Whole grain ▪ Multigrain ▪ Dairy ▪ Nuts, seeds ▪ Millets, Oats, Suji ▪ Legumes/pulses ▪ Clinically proven ingredients ▪ Prebiotics, Probiotics ▪ Vitamins and Minerals ▪ MUFA, PUFA ▪ DHA <p><i>Criteria: As per applicable regulatory requirements (FSSAI) and contribution towards dietary recommendations as per NIN-ICMR and WHO.</i></p>	<ul style="list-style-type: none"> ▪ Energy ▪ Added Sugars ▪ Saturated Fat ▪ Trans Fat ▪ Sodium <p><i>Criteria: As per thresholds.</i></p>

Note: Nutrients & ingredients shall be updated in line with latest regulatory scenario and national health priorities.

TABLE 3: DAILY NUTRIENT REFERENCE VALUES FOR ADULTS AND CHILDREN FOR NUTRIENTS TO BE REDUCED

ADULTS			
S.No.	Nutritional Factors	Daily Reference Value	Source
1	Energy	2000 kcal	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
			FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
2	Added Sugars	10% of Energy	FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
3	Saturated Fat	10% of Energy	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
			FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
4	Trans Fat- from hydrogenated vegetable oil (HVO)	1% of Energy	WHO. Press release welcomes industry action to align with global trans-fat elimination targets 2019
			FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
5	Sodium	2000mg	WHO Guideline; sodium Intake for adults and children; WHO; 2012
			FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
CHILDREN (2-3 YEARS)			
S.No.	Nutritional Factors	Daily Reference Value	Source
1	Energy	1110 kcal	EAR's, NIN- ICMR 2020
2	Added Sugars	10% of Energy	FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
3	Saturated Fat	10% of Energy	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
4	Trans Fat- from hydrogenated vegetable oil (HVO)	1% of Energy	WHO. Press release welcomes industry action to align with global trans-fat elimination targets 2019

5	Sodium	1110 mg	WHO Guideline; sodium Intake for adults and children; WHO; 2012 WHO NUTRIENT PROFILE MODEL FOR SOUTH-EAST ASIA REGION;2017
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CHILDREN (4-6 YEARS)

S.No.	Nutritional Factors	Daily Reference Value	Source
1	Energy	1360 kcal	EAR's, NIN- ICMR 2020
2	Added Sugars	10% of Energy	FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
3	Saturated Fat	10% of Energy	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
4	Trans Fat- from hydrogenated vegetable oil (HVO)	1% of Energy	WHO. Press release welcomes industry action to align with global trans fat elimination targets 2019
5	Sodium	1360 mg	WHO Guideline; sodium Intake for adults and children; WHO; 2012 WHO NUTRIENT PROFILE MODEL FOR SOUTH-EAST ASIA REGION; 2017

CHILDREN (7-9 YEARS)

1	Energy	1700 kcal	EAR's, NIN- ICMR 2020
2	Added Sugars	10% of Energy	FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
3	Saturated Fat	10% of Energy	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
4	Trans Fat- from hydrogenated vegetable oil (HVO)	1% of Energy	WHO. Press release welcomes industry action to align with global trans fat elimination targets 2019
5	Sodium	1700 mg	WHO Guideline; sodium Intake for adults and children; WHO; 2012 WHO NUTRIENT PROFILE MODEL FOR SOUTH-EAST ASIA REGION; 2017

CHILDREN (10-12 YEARS)

1	Energy	2220- 2060 kcal	EAR's, NIN- ICMR 2020
2	Added Sugars	10% of Energy	FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
3	Saturated Fat	10% of Energy	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
4	Trans Fat- from hydrogenated vegetable oil (HVO)	1% of Energy	WHO. Press release welcomes industry action to align with global trans fat elimination targets 2019

5	Sodium	2220- 2060 mg	WHO Guideline; sodium Intake for adults and children; WHO; 2012 WHO NUTRIENT PROFILE MODEL FOR SOUTH-EAST ASIA REGION; 2017
CHILDREN (13-15) YEARS			
1	Energy	2400- 2860 kcal	EAR's, NIN- ICMR 2020
2	Added Sugars	10% of Energy	FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
3	Saturated Fat	10% of Energy	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
4	Trans Fat- from hydrogenated vegetable oil (HVO)	1% of Energy	WHO. Press release welcomes industry action to align with global trans-fat elimination targets 2019
5	Sodium	2400- 2860 mg	WHO Guideline; sodium Intake for adults and children; WHO; 2012 WHO NUTRIENT PROFILE MODEL FOR SOUTH-EAST ASIA REGION; 2017
CHILDREN (16-18) YEARS			
1	Energy	2500- 3320 kcal	EAR's, NIN- ICMR 2020
2	Added Sugars	10% of Energy	FOOD SAFETY AND STANDARDS (LABELLING AND DISPLAY) REGULATIONS, 2020
3	Saturated Fat	10% of Energy	JOINT FAO/WHO/UNU EXPERT consultation. Human Energy Requirements; FAO: Rome. Italy, 2001
4	Trans Fat- from hydrogenated vegetable oil (HVO)	1% of Energy	WHO. Press release welcomes industry action to align with global trans fat elimination targets 2019
5	Sodium	2500- 3320 mg	WHO Guideline; sodium Intake for adults and children; WHO; 2012 WHO NUTRIENT PROFILE MODEL FOR SOUTH-EAST ASIA REGION; 2017

TABLE 4: REFERENCE VALUES FOR NUTRIENTS &/OR INGREDIENTS TO BE ENCOURAGED

Positive Nutrient/Ingredient	Reference
Protein	FSSR claims criteria Ref: Food Safety and Standards (Advertising and Claims) Regulations,2018
Fibre	FSSR claims criteria Ref: Food Safety and Standards (Advertising and Claims) Regulations,2018
Vitamins and Minerals	FSSR claims criteria Ref: Food Safety and Standards (Advertising and Claims) Regulations,2018
MUFA, PUFA	FSSR claims criteria Ref: Food Safety and Standards (Advertising and Claims) Regulations,2018
DHA	FSSR claims criteria Ref: Food Safety and Standards (Advertising and Claims) Regulations,2018
Clinically proven ingredients	FSSR claims criteria Ref: Food Safety and Standards (Advertising and Claims) Regulations,2018
Probiotics	FSSR criteria Ref: Food Safety and Standards (Health Supplements, Nutraceuticals, Food for Special Dietary Use, Food for Special Medical Purpose, and Prebiotic and Probiotic Food) Regulations, 2022. [FSSAI (Nutra) Regulations, 2022
Prebiotics	FSSR criteria Ref: Food Safety and Standards (Health Supplements, Nutraceuticals, Food for Special Dietary Use, Food for Special Medical Purpose, and Prebiotic and Probiotic Food) Regulations, 2022. [FSSAI (Nutra) Regulations, 2022
Whole grain	Grains (e.g. ground, cracked, flaked or otherwise processed) after removal of inedible parts such as the hull and husk, where the three fractions endosperm, germ and bran are present in the same relative proportion as in the intact grains. Small loss of components that occur through Good Manufacturing Practices (GMP) (viz. cleaning, milling, sieving etc,) consistent with safety and quality are allowed
Multigrain	More than 1 grain
Dairy	50 ml (fresh equivalence basis) per 100ml/g Ref: Basis Dietary Guidelines for Indian NIN-ICMR (minimum 50% of a recommended dairy amount)
Nuts, seeds	5g (fresh per 100g/ml equivalence basis) per 100ml/g
Cereals (Millets, Oats, Suji etc)	15 g (fresh equivalence basis) per 100g/ml Ref: Basis Dietary Guidelines for Indian NIN-ICMR; (minimum 50% of a recommended amounts)

Legumes/pulses	15 g (fresh equivalence basis) per 100g/ml Ref: Basis Dietary Guidelines for Indian NIN-ICMR; (minimum 50% of a recommended amounts)
Fruits & Vegetables	50 g (fresh equivalence basis) per 100g/ml; Excluding starchy roots & vegetables. Ref: Basis Dietary Guidelines for Indian NIN-ICMR; (minimum 50% of a recommended amounts)

TABLE 5: CATEGORY BASED THRESHOLDS

Product Categories	Energy (% reference value per serve)	Added sugars (% reference value per serve)	Saturated Fat (% reference value per serve)	Trans fat per serve	Sodium (% reference value per serve)	Positive Contribution
Main Meal Dishes	≤25%	≤10%	≤ 20%	< 0.2g trans-fat/serve (from HVO's)	≤25%	Minimum ONE basis qualifying criteria
Fresh Dairy (No added Sugar/Salt)	≤7.5%	Not Applicable	≤22% (only from dairy source)	< 0.2g trans-fat/serve (from HVO's)	≤7.5%	Minimum ONE basis qualifying criteria
Light Meal	≤20%	≤10%	≤ 15%	< 0.2g trans-fat/serve (from HVO's)	≤20%	Minimum ONE basis qualifying criteria
Snacks (savory)	≤12.5%	≤10%	≤ 15%	< 0.2g trans-fat/serve (from HVO's)	≤12.5%	Minimum ONE basis qualifying criteria
Snacks (sweet)	≤12.5%	≤25%	≤ 15%	< 0.2g trans-fat/serve (from HVO's)	≤12.5%	Minimum ONE basis qualifying criteria
Beverages	≤12.5%	≤25%	≤ 15%	< 0.2g trans-fat/serve (from HVO's)	≤12.5%	Minimum ONE basis qualifying criteria

Cooking aids	≤10 %	≤10%	≤ 10%	< 0.2g trans-fat/serve (from HVO's)	≤10%	Minimum ONE basis qualifying criteria
Accompaniments	≤5%	≤5%	≤ 5%	< 0.2g trans-fat/serve (from HVO's)	≤7.5%	Minimum ONE basis qualifying criteria
Treats	≤5%	≤25%	≤10%	< 0.2g trans-fat/serve (from HVO's)	≤5%	Not Applicable
			≤20% (for chocolates, having minimum of 25% total fat from cocoa fat &/or milk fat).			

Note:

1. *In certain applicable conditions & cases, a product having a nutrient level ≤ 5% of the threshold value will be considered compliant to profiling system.*
2. *Certain exceptional approvals would be allowed for specific products to allow for appropriate remedial action, with a dedicated timeline. This will only be done basis the discretion of a CMC member/ Head of division.*
3. *In addition to above system, we will continue to work with FSSAI and Industry associations and other stakeholders, to develop a uniform Nutrient profiling system, in Indian context. Once the system will be developed & notified, we will implement the same on all our applicable product categories. We firmly believe, Nutrition profiling systems, well designed as per the National dietary requirements & health priorities, can help drive the innovation & renovation strategy in right manner to support health & wellness of consumers.*

D. APPLICATION OF PROFILING SYSTEM OUTCOMES

1. **Products renovations & innovations strategy will be guided by Profiling system.**

The profiling system will guide the renovations and innovations in a step-by-step approach, with consumer needs & preferences at the centre of the design & strategy. The profiling system would be used at early stages of product development during innovation and across the product life stages to continuously enhance their overall positive contributions. Relevant products under the renovation and innovation pipeline will be fortified and/or enriched with nutrients to cater to bigger concerns like malnutrition, obesity, undernutrition and/or micronutrient deficiencies, set out in National Nutrition Strategy and Vision 2022 (Kuposhan Mukh Bharat), Mission POSHAN 2.0. ICMR-NIN's nutrition guidelines along with FSSAI's regulatory framework will form the basis of all product reformulations and new development. Attempts will also be made to include ingredients with high inherent levels of nutrients

including fortified ingredients to develop products. It can also be used as a guiding tool for evaluating the portfolio healthiness for new investments.

2. Marketing Guidance by Profiling system

The outcomes of the product portfolio healthiness will be used as a guiding tool and a critical input while devising the marketing strategies across the portfolio especially marketing to children. For more details refer ITC Limited Foods Division's Marketing and Communication Policy.

The Profiling system will take into consideration technical feasibility, consumer acceptance without compromising on science, to ensure right value-added products are delivered.

REFERENCES:

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