

Proposed Trade Guidelines on Preparation of Legible Food Label

**Centre for Food Safety
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[Draft guidelines (issued: Dec 2011)]

- Suitable font size
 - For example, type size of 8 point (~2.8mm in height) or above is considered easily readable; and
 - type size of 5 point (~1.8mm in height) is acceptable when it is not practical to use larger fonts
- Good contrast
 - To use all black or single dark colour type, printed on white or other single light colour contrasting background whenever practical (vice versa acceptable as long as words are clearly shown)
- Enough spacing
 - Words and characters should never touch each other or the lines/borders surrounding/separating the information

Progress

- Discussed in Trade Consultation Forum (9 Dec 2011, 23 Feb 2012)
- Discussed in Working Group on Nutrition Labelling (6 Dec 2011, 17 Apr 2012)
- CFS collected comments on the draft guidelines (up to 31 Jan 2011)
- Consumer Council published article in Choice Magazine about the legibility of nutrition label in local food products (Feb 2012)
- CFS consulted consumers representatives (Apr 2012)
- CFS consulted the Consumer Council (Apr 2012)

[Revising proposed guidelines]

- The principle is to ensure the labels are legible
- Making reference to practice and experience of other jurisdictions
 - most of the prepackaged food products in Hong Kong are imported
- Taking traders' and consumers' comments into consideration

Proposed revision

- Measurement in terms of millimeter (x-height for English and total height for Chinese)
 - To tally with common practice of other jurisdictions
 - To avoid confusion (different height of character of different font type even with the same type size)
 - To respond to comments from consumer group



Size of different fonts

Point	Font	Estimated total height (mm)	Estimated x-height (mm)
8	Garamond	2.9	1.1
	Times New Roman	2.9	1.3
	Arial	2.9	1.5
	Comic Sans MS	2.8	1.5
	Verdana	2.8	1.5
	新細明體	2.6	-
	細明體	2.6	-
	標楷體	2.5	-

Size of different fonts

Point	Font	Estimated total height (mm)	Estimated x-height (mm)
5	Times New Roman	1.8	0.8
	Arial	1.7	0.9
	Comic Sans MS	1.7	0.9
	Verdana	1.8	1.0
	新細明體	1.7	-
	細明體	1.7	-
	標楷體	1.6	-

Proposed revision

- To consider setting minimum font size for English and Chinese characters for meeting the legibility requirement, with reference to overseas experience
- **In general, a font size of at least 1.2mm x-height for English letter and Chinese characters in comparable font size is recommended**

Proposed revision

- Larger font size may not be always practically feasible for some products. Examples of these situations are-
 - Smaller package of total surface area smaller than 400cm²;
 - Some products may be required to present other information in addition to those required by HK Laws, such as those required international standards/guidelines;
 - Infant formula and related food products may also need to provide detailed nutrition information and instruction for consumer use;
 - When the information are presented in more than one language, e.g, Chinese and English, the font size need to be adjusted; or
 - Imported product with limited spacing for affixing label with larger font size.

Proposed revision

- The following minimum font size should be provided:
 - **English letters: 0.8mm x-height**
 - Minimum font size for small packing in Canada (bilingual label)
 - Smallest font size requirement among EU, USA, Canada and Australia
 - **Chinese characters: 1.8mm total height**
 - Smallest font size requirement among Mainland China and Taiwan

Proposed revision

- Additional recommendation for “good contrast”:
 - For products packed in transparent containers, it is recommended that the food label area should come with a non-transparent contrasting background, so that the clarity of the label would not be affected by the colour or appearance of the food.

Way Forward

- Consultation with Trade
 - The current Trade Consultation Forum meeting
- Discussion in LegCo Panel in May
- Expected to be finalised in May 2012

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