

Proposed Trade Guidelines on Preparation of Legible Food Label

Centre for Food Safety
23 February 2012

Current draft guidelines

- 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

Requirements on font size of other jurisdictions – Chinese

■ Mainland

National Food Safety Standard- Standard for the Labeling of Prepackaged Foods (GB 7718—2011)

- 3.9 When the largest surface area of the package/container of prepackaged food is $> 35\text{cm}^2$, the height of words, symbols and numbers for mandatorily required information should not be $< 1.8\text{mm}$

■ Taiwan

Enforcement Rules of the Act Governing Food Sanitation

- Article 13 -- The length and width of the characters marked on the labels shall not be less than 2mm. However, where the area of the largest surface of a package is $< 10\text{cm}^2$, the length and width of characters for all items other than the name of the product, the company name, and expiry date, may be $< 2\text{mm}$

Requirements on font size of other jurisdictions – English

Country	General	Small packing
Canada (*bilingual)	≥ 1.6 mm height ("x-height")	≥ 0.8 mm in height ("x-height" (when principal display surface is <10cm ²)
EU	"x-height" ≥ 1.2 mm	"x-height" ≥ 0.9 mm (if largest surface < 80cm ²)
US	$\geq 1/16$ inch (1.6 mm) based on lower case letter "o" ("x-height"	Smaller type sizes may be used on very small food packages. Minimum size not specified.
Australia	Warning statements: Size of type of ≥ 3 mm	Warning statements: Size of type ≥ 1.5 mm in small package

[Comments received from Trade (1)]

- Traders generally welcome the establishment of guidelines and agreed legible food label are important
- They agreed with the principles of “good contrast” and “enough spacing”
- Some traders have reservation if **font size** of 8 point (about 2.8mm in height) and 5 point (about 1.8mm in height) are set as mandatory minimum font size requirements

[Comments received from Trade (2)]

- Individual traders suggested to adopt single set of requirement for all products-
 - Minimum font size ranged from 0.9mm (~2.5 point) to 2mm (~5.5 point)
 - Separate requirements for English and Chinese fonts, e.g., 4 point (~1.4mm) for English and total height 1.8mm for Traditional Chinese
 - Use not smaller than 2 mm (~ 5.5 point) for a bilingual food label

Comments received from Trade (3)

- Individual traders suggested to adopt separated requirements for different package sizes-
 - 2 mm font size (~ 5.5 point) for package with total surface area $>200 \text{ cm}^2$; or
1.2 mm font size (~ 3.5 point) for package with total surface area $<200 \text{ cm}^2$
 - “x-height” of English characters should be $\geq 1.2\text{mm}$ (roughly point 6.5- 9, depending on the font type); or $\geq 0.9\text{mm}$ (roughly point 4.5-6.5, depending to font type) when the largest surface of the package is less than 80cm^2

Comments of consumer group

- Font size should be specified (e.g., in millimeter)
- Words should be clearly shown
- There should be enough spacing between words and lines
- There should be good contrast between the type and the background. For example, appropriate coloured background could be added to the label area when food label is printed on transparent plastic bag

Principles of revising the proposed guidelines

- 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



Proposed revision

- To consider setting minimum font size for English and Chinese characters for meeting the legibility requirement, with reference to overseas experience
- To encourage traders to use larger fonts whenever practical, in order to facilitate consumers using food label to make informed food choices and enhance consumers' satisfaction on the product

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