

Labelling of Prepackaged Food in Hong Kong

Centre for Food Safety



What is prepackaged food?

- Nutrition labelling regulations cover the prepackaged food.
- “Prepackaged food” means any food packaged, whether completely or partially, in such a way that
 - the contents cannot be altered without opening or changing the packaging; and
 - the food is ready for presentation to the ultimate consumer or a catering establishment as a single food item.



What is prepackaged food?

- The following are not considered as prepackaged food and general labelling and nutrition labelling is not required:
 - **Products that are not packed beforehand and are just put in packaging for customers at the point of sale**

Not
prepackaged
food



What is prepackaged food?

- Products put in packaging that the opening is not tied up nor sealed

Not
prepackaged
food



What is prepackaged food?

- However, for example, for bakery products packed in a plastic bag fastened up with a metal wire, a plastic wire or a date hook, they are considered as prepackaged food.



Labelling of Prepackaged Food in Hong Kong

- At present, Cap. 132 W requires the following information to be legibly marked on the food label of all prepackaged food, unless otherwise exempted-
 1. Name of the food;
 2. List of ingredients (including ingredients, allergenic substances and additives);
 3. Indication of durability;
 4. Special conditions for storage or instruction for use;
 5. Count, weight or volume;
 6. Name and address of manufacturer or packer; and
 7. Nutrition label.

Food Labelling

食物名稱 Name of the food

- 須加上可閱標記，不得就食物的性質有虛假、誤導或詐騙成分。
- It shall be legibly marked and shall not be false, misleading or deceptive as to the nature of the food.

製造商或包裝商 的名稱及地址 Name and address of manufacturer or packer

保質期的說明 Indication of durability

- “此日期或之前食用”或“此日期前最佳”
- “Use by” or “Best before” date.

數量、重量或體積 Count, weight or volume

配料表

List of ingredients

- 配料須按用於食物包裝時所佔的重量或體積，由大至小依次表列。
- 如含有法例中列明的食物致敏物，必須標示。
- 如使用添加劑，須標示其作用類別和其本身所用名稱或國際識別編號（不論是否以“E”或“e”為詞頭）。
- Ingredients should be listed in descending order of weight or volume determined as at the time of their use when the food was packaged.
- Allergenic substances stated in the law should be specified if they are present in the food.
- Functional class of an additive and its specific name or international identification number (with or without the prefix “E” or “e”) should be specified if it is used.

特別貯存方式 或使用指示的陳述

Statement of special conditions for storage or instructions for use



1. Name of the Food

- The food name shall not be false, misleading or deceptive. It should also serve to make the nature and type of food known to the purchaser.

2. List of Ingredients

- Preceded by an appropriate heading consisting of the words "ingredients", "composition", "contents" or words of similar meaning, the ingredients shall be listed in descending order of weight or volume determined as at the time of their use when the food was packaged
- Declare the presence of any of the eight substances, namely
 1. cereals containing gluten;
 2. crustacea and crustacean products;
 3. eggs and egg products;
 4. fish and fish products;
 5. peanuts, soybeans and their products;
 6. milk and milk products (lactose included);
 7. tree nuts and nut products; and
 8. sulphite in concentrations of 10 parts per million or more, which are known to cause allergy.
- If an additive constitutes one of the ingredients of a food, it should be listed by both the **functional class** and the **specific name** or the identification number under the International Numbering System for Food Additives adopted by the Codex Alimentarius Commission.

3. Indication Durability

- Use either the words
- "use by 此日期或之前食用" or
- "best before 此日期前最佳", as the case may be, followed by the date up to which specific properties of the food can be retained, to indicate the shelf life of the food.

4. Statement of Special Conditions for Storage or Instructions for Use

- If special conditions are required for storage to retain the quality or special instructions are needed for the use of prepackaged food, a statement should be legibly marked on the label.

5. Name and Address of Manufacturer or Packer

- The prepackaged food should be legibly labelled with the full name and full address of the manufacturer or packer, or otherwise in accordance with the requirements as stipulated in the Regulations.

6. Count, Weight or Volume of Food

- The food label should include the numerical count or net weight or net volume of the prepackaged food.

Food Labelling

- Save with the exemptions for those items as listed in Schedule 4 to the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), it is in breach of regulation 4 or 4A of the said Regulations.
- If there is sufficient evidence to prove any contravention under the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), legal action will be taken against the offender. Upon conviction by the Court, the offender is liable to a maximum fine of \$50,000 and 6 months imprisonment.

Food Labelling

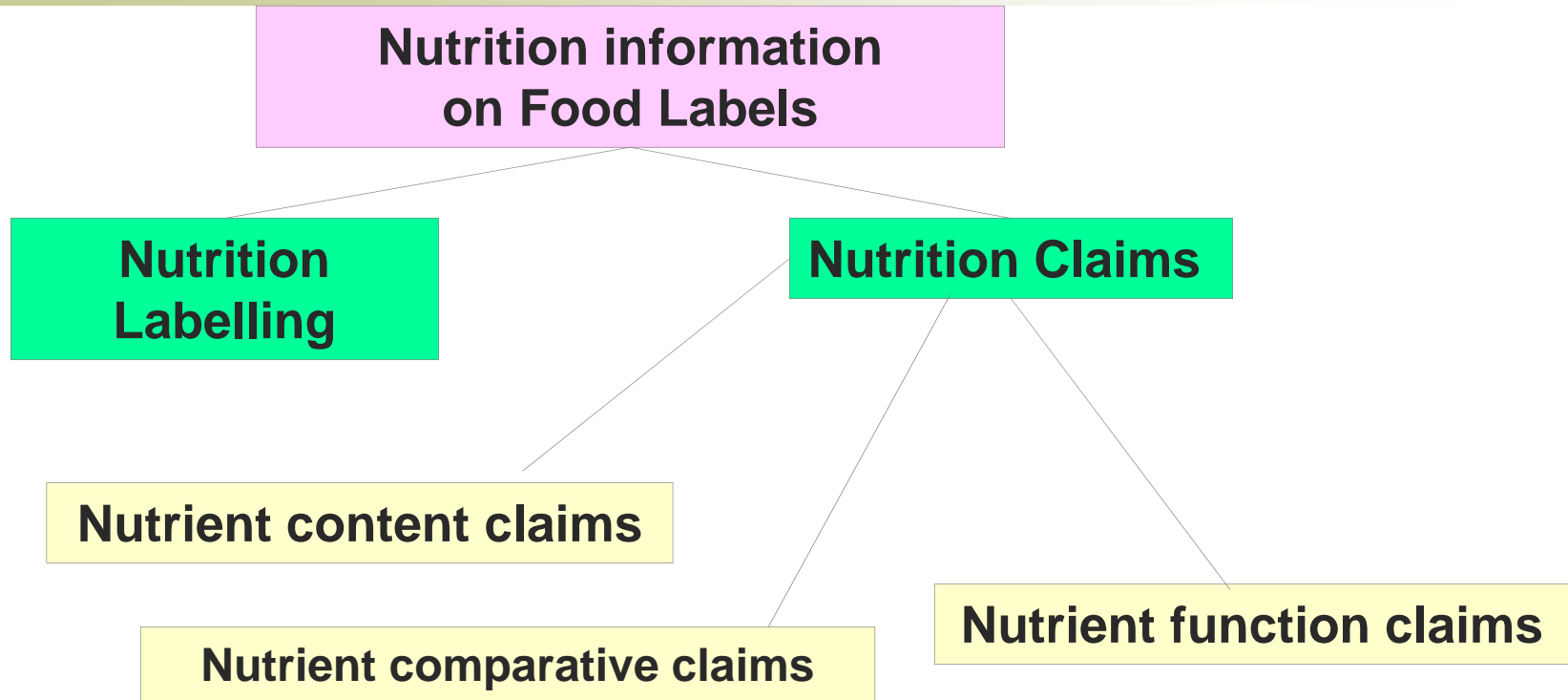


Nutrition Labelling

Aims of the Scheme

- Facilitate consumers in making healthy food choices
- Encourage food manufacturers to apply sound nutrition principles in the formulation of foods
- Regulate misleading or deceptive labels and claims on nutrition information

The scope of nutrition labelling scheme



*The scope of regulation: **General pre-packaged food**

The scope of nutrition labelling scheme

- Any person who sells prepackaged food without nutrition labelling is liable to a maximum fine of \$ 50,000 and imprisonment for 6 months.

Required Nutrients on Nutrition Labels

- **1+7** (energy +7 core nutrients) – i.e., **energy, protein, carbohydrate***, total fat, saturated fat, trans fat, sodium, sugars
- Claimed nutrients (when the claim is on any type of fat, cholesterol content must be declared as well)
- For other nutrients, declaration is voluntary



Nutrition Information 營養資料	
	Per Package/ 每包裝
Energy/ 能量	122kcal/ 千卡 (512kJ/ 千焦)
Protein/ 蛋白質	5.4g/ 克
Total fat/ 總脂肪	1.9g/ 克
- Saturated fat/ 飽和脂肪	1.3g/ 克
- Trans fat/ 反式脂肪	0g/ 克
Cholesterol/ 膽固醇	9mg/ 毫克
Carbohydrate/ 碳水化合物	20.8g/ 克
- Sugars/ 糖	13.4g/ 克
Sodium/ 鈉	63mg/ 毫克

Required Nutrients on NL - Expressions

- Per 100 g (or 100 ml);
- Per package (if the package contains only one single serving); or
- Per serving (if the information on the serving size in g/ml and the no. of servings in the package are provided)

The image shows three examples of Nutrition Information labels. The top label has 'Per 100g/ 每100克' circled in red. The middle label has 'Per Serving 每食用分量' circled in green. The bottom label has 'Per Package 每包裝' circled in green.

Nutrition Information 營養資料	
Per 100g/ 每100克	

Nutrition Information 營養資料	
Servings Per Package/ 每包裝所含食用分量數目: 3	
Serving Size/ 食用分量: 5 pieces (50g)/ 5塊 (50克)	
Per Serving 每食用分量	
Energy/ 能量	218kcal/ 千卡 (916kJ/ 千焦)

Nutrition Information 營養資料	
Servings Per Package/ 每包裝所含食用分量數目: 1	
Serving Size/ 食用分量: 236mL / 236毫升	
Per Package 每包裝	
Energy/ 能量	158kcal/ 千卡 (664kJ/ 千焦)
Protein/ 蛋白質	7.6g/ 克
Total fat/ 總脂肪	9.2g/ 克
- Saturated fat/ 飽和脂肪	5.7g/ 克
- Trans fat/ 反式脂肪	0.3g/ 克
Carbohydrates/ 碳水化合物	11.3g/ 克
- Sugars/ 糖	11.3g/ 克
Sodium/ 鈉	130mg/ 毫克

Nutrition Claim

- Means any representation which states, suggests or implies that a food has particular nutritional properties
- Nutrition claims include:
 - Nutrient content claim
 - Nutrient comparative claim
 - Nutrient function claim
- Food labels and advertisement are subject to the control



Exemptions- Principles

- As for nutrition labelling, under Schedule 6 of Cap.132W, some food items are exempted from the nutrition labelling requirements of the Regulations,
- General Exemption Item
 - Practical difficulty for the trade (e.g., prepackaged food packed in a container which has a total surface area of less than 100cm²)
 - The food does not contain (meeting definition of zero) of energy and core nutrients
 - Certain food which is fresh in nature without any addition of ingredient (e.g., fresh and dried fruits and vegetables)

■ Prepackaged food with small sales volume

Small Volume Exemption Scheme

- Prepackaged foods
 - same version
 - with annual sales volume not exceeding 30,000 units

may be granted with exemption from providing nutrition labelling.

- Prior approval from Centre for Food Safety (CFS) of FEHD is required.

Eligible Applicants

- Importers (for imported products)
Manufacturers (for local products)
- Must be a Hong Kong registered company (holding a valid Business Registration Certificate (BRC))
- In case applying in the name of individual, the applicant must hold a Hong Kong Identity Card (HKIC)
- For the same product, we can accept applications from more than one importer or manufacturer

[Label for Exempted Product]

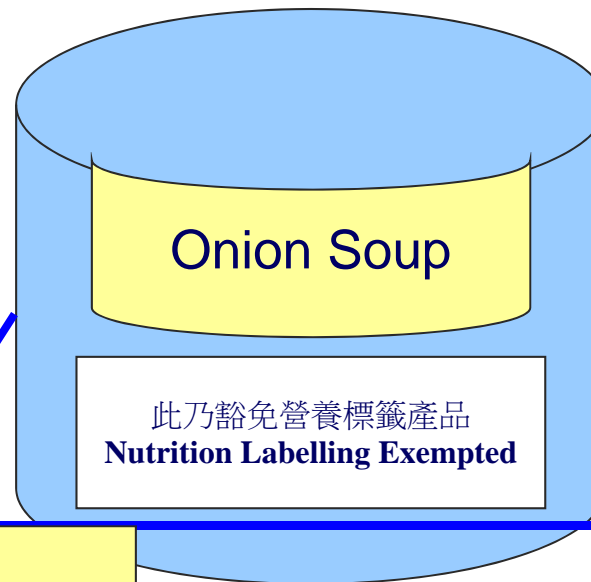
- The exempted product, when displayed for sale, should bear a label/sticker printed with the following wordings:

此乃豁免營養標籤產品
Nutrition Labelling Exempted
豁免編號 **Exemption No. :**
12-XXXXXX

Label for Exempted Product

The Exemption no. may also be marked legibly on a conspicuous place close to where the product is displayed for sale (like the display card for price in the product shelf).

Onion Soup
\$ 10.0
豁免編號
Exemption No.: 12-123456



Product shelf

洋蔥湯
\$ 10.0
豁免編號
Exemption No.: 12-123456

Display card for price

Guide to Application for Small Volume Exemption

- Centre for Food Safety has prepared the “Guide to Application for Small Volume Exemption” and uploaded into CFS’s website for reference by the trade.

~ Thank you ~