

預先包裝食物的標籤 Labelling of Prepackaged Food

業界諮詢論壇

Trade Consultation Forum

16-03-2016

預先包裝食物的標籤

Labelling of Prepackaged Food

- 根據《食物及藥物(成分組合及標籤)規例》(第132W章)的規定，預先包裝食品必須加上適當的食物標籤。
- 食物標籤包括：
 - 一般標籤
 - 營養標籤
- According to the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), all prepackaged food shall be labelled with appropriate Food Labelling.
- Food Labelling includes:
 - General Labelling
 - Nutrition Labelling

何謂預先包裝食物？

What is prepackaged food?

- “預先包裝食物”指任何經全部或部分包裝食物以致-
 - 如不打開或不改變包裝，則不能將包裝內的食物變更；以及
 - 該食物可隨時作為單份食品，交給最後消費者或飲食供應機構
- “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

何謂預先包裝食物？

What is prepackaged food?

- 至於下列食物，則不會視作預先包裝食物，無須加上一般標籤和營養標籤：
 - 本身沒有包裝而只在顧客選購後才作包裝的食物
 - 放在包裝內但沒有繫緊或密封封口的食物
- 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
 - Products put in packaging that the opening is not tied up nor sealed

食物標籤

Food Labelling

- 須使用中文或英文，或中英文兼用，列出以下資料：
 - 食物名稱
 - 配料表
 - 保質期的說明
 - 特別貯存方式 或 使用指示的陳述
 - 製造商 或 包裝商的名稱及地址
 - 食物的數量、重量或體積
 - 營養標籤
- Use either the English or the Chinese language or in both language, to list out the following information:
 - Name of the food
 - List of ingredients
 - Indication of durability
 - Statement of special conditions for storage or instructions for use
 - Name and Address of manufacturer or packer
 - Count, weight or volume
 - Nutrition Label

一般標籤 General 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

營養標籤 Nutrition Labelling



營養標籤
Nutrition
Labelling

有關標籤的重要事件

Important Labelling Issues

- 食安中心決定收緊執法，取消解釋期，以及發出警告信及給予限期糾正違規之處等做法。
- 如食安中心發現任何不符合規定的情況，包括標籤未能達到可閱的程度，食安中心會立即採取檢控而不會再給予時間糾正。
- 食安中心在知會業界後，已於二零一四年十月一日起實施新的安排。
- CFS decided to tighten up its enforcement by doing away with the explanation period, as well as the practice of issuing warning letters and allowing time for rectifying any irregularities.
- If CFS identifies any non-compliance with the requirements, including failure to provide labels meeting the legibility requirements, CFS will initiate prosecution immediately without allowing any time for rectification.
- The new practice came into effect on 1 October 2014 after CFS had notified the trade.

自2014年10月1日執行新執法策略後 不符合營養標籤規定的數字

Non-compliance Figures of Nutrition Labelling Since The Implementation of New Enforcement on 1 October 2014

- 共發現有54件預先包裝食品不符合營養資料標籤制度的規定。
 - 其中33件預先包裝食品的標籤透過目測顯示未能符合法定的營養資料標籤制度規定。
 - 其中21件預先包裝食品透過化驗分析發現當中食品的營養成分與標籤不符。
- 54 prepackaged food products were found not complying with the Nutrition Labelling Scheme.
 - of which, 33 were identified by visual checking for not complying with the statutory requirements of the Nutrition Labelling Scheme.
 - of which, 21 were identified by chemical analysis for discrepancy between the nutrient content and the declared value on the nutrition label.

*** 截至2016年3月7日
as at 7.3.2016

Nature of non-compliance cases identified by visual checking

透過目測發現違規事項的性質

Nature of violations 違規事項的性質	No. of products since 1 October 2014 自2014年10月1日起的違規數字
No or incomplete nutrition label (NL) 沒有營養標籤或標籤上資料不全	29
Inappropriate NL format (including illegible NL) 營養標籤的格式不適當 (包括營養標籤未能清楚可閱)	1
Inappropriate language 使用的語言不適當	2
Involving more than one type of irregularities 涉及超過一種不符合規定的情況	1
Total 總計	<u>33</u>

Discrepancy between the nutrient content and the declared value on the nutrition label of the foods identified by chemical analysis

透過化驗分析發現營養成分與標籤不符的食品

Food Category (食品類別)	No. of products since 1 October 2014 自2014年10月1日起的違規數字
Aquatic Products (海產)	1
Candies and Snacks (糖果及小食)	3
Cereals (穀物)	2
Dairy Products (乳類製品)	2
Drinks (飲品)	1
Lap Mei (臘味)	5
Legumes Products (豆類製品)	1
Oil, Sauces and Condiments (油,醬油及調味料)	2
Seasonal Foods (時令食品)	4
Total (總計)	<u>21</u>

Discrepancy between the nutrient content and the declared value on the label of the foods identified by chemical analysis

透過化驗分析發現營養成分與標籤不符的食品

Energy / Nutrient (能量值 / 營養素)	No. of Unsatisfactory Parameter (不滿意檢測項目數字)
Energy value (能量值)	0
Protein (蛋白質)	2
Available carbohydrates (可獲得的碳水化合物)	1
Total fat (總脂肪)	5
Saturated fatty acids (飽和脂肪酸)	4
Trans fatty acids (反式脂肪酸)	1
Sodium (鈉)	5
Sugars (糖)	5
Dietary fibre (膳食纖維)	2
Total (總計)	<u>25*</u>

*Remarks (備註)

Total 21 non-compliant samples with 25 unsatisfactory testing parameters.

總計有21個不符合樣本，涉及25個不滿意檢測項目。

給業界的建議

Advice to Trade

- 了解“預先包裝食物”的定義
- “預先包裝食物”指任何經全部或部分包裝食物以致-
 - 如不打開或不改變包裝，則不能將包裝內的食物變更；及
 - 該食物可隨時作為單份食品，交給最後消費者或飲食供應機構
- Understanding the definition of “Prepackaged Foods”
- “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

給業界的建議

Advice to Trade

- 預先包裝食物須附有營養標籤，上面須依照訂明的格式標示能量和七種指定營養素(蛋白質、碳水化合物、總脂肪、飽和脂肪酸、反式脂肪酸、鈉和糖)的資料。
- 此外，規例亦訂明在標籤上作出營養聲稱的條件。
- Prepackaged foods require to include in its labels nutrition information of energy and seven specific nutrients (protein, carbohydrates, total fat, saturated fatty acids, trans fatty acids, sodium and sugars) in **prescribed format**.
- Also, the regulation defines the standard conditions for nutrition claims to be made on the labels.

給業界的建議

Advice to Trade

- 業界可對食物樣本進行直接化學分析、或通過計算方法進行間接營養素分析，以取得食物的營養資料。
- 間接營養素分析是其中一種可接受的途徑，以取得資料作標籤用途。業界有責任確保食物標籤的資料準確無誤。
- 建議製造商、進口商、銷售商和有關人士聘用檢測服務，以核實產品的營養標籤上的聲明。
- The nutrition information of foods can be obtained by either direct chemical analysis of food samples or indirect nutrient analysis based on calculation.
- Indirect nutrient analysis is accepted as one of the means to obtain information for labelling. The trade are held responsible for the accuracy of information provided on food labels.
- Manufacturers, importers, vendors, or any relevant parties, are recommended to engage laboratory testing to verify their own nutrition label declarations.

給業界的建議

Advice to Trade

- 由於食物的營養素成分可能因季節、加工過程、配料來源的不同而有差異，以致不同批次或不同食用限期的同一食品的营养素數值可能會有所不同。
- 因此，食物安全中心已針對產品不同批次的差異制定可容忍水平。然而，如差異巨大，食物商應設法提高產品的質量控制。
- As nutrient composition of foods may be different due to variations in seasons, processing practices and ingredient sources, it may lead to differences in the listed nutrient values among different product batches or products with different expiry dates.
- Thus, Centre for Food Safety has developed tolerance levels for deviation in different batches of products. Nevertheless, food trader had to be stepped up the quality control of the product if the deviation was very large.

最高罰則

Maximum Penalty

- 任何人士售賣沒有標示營養標籤的預先包裝食物，即屬違法，最高罰款為 \$50,000 及監禁 6 個月。
- Any person who sells prepackaged food without nutrition labelling is liable to a maximum fine of \$50,000 and imprisonment for 6 months.

謝謝

- http://www.cfs.gov.hk/tc_chi/programme/programme_nifl/programme_nifl_faq.html



- http://www.cfs.gov.hk/english/programme/programme_nifl/programme_nifl_faq.html