Nutritional Labelling of formula products and foods

Legislative Proposal Relating to Formula Products and Foods Intended for Infants and Young Children under the Age of 36 Months in Hong Kong

4th Technical Meeting with Trade (Laboratory Service Providers)
17 October 2013
Codex Requirement

- CODEX STAN 72 – 1981 covers nutrition labelling of infant formula
- CODEX STAN 156 – 1987 covers nutrition labelling of follow-up formula
- CODEX STAN 74 – 1987 and CODEX STAN 73 – 1981 cover nutrition labelling of foods intended for infants and young children
Nutrition labelling of infant formula
Nutrition labelling of infant formula

- Codex STAN 72-1981 requires labelling of “1+29”:
  - Energy
  - Protein, Carbohydrates
  - Fat
  - 13 Vitamins
  - 12 Minerals and trace elements
  - 1 Other substance (Choline)

- Some traders request to adopt “1+29” to tally with Codex requirements
Comparison of nutrition labelling compulsory requirements of infant formula in Codex standard and major countries and territories

<table>
<thead>
<tr>
<th></th>
<th>Labelling Requirement</th>
<th>Remark</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Codex</strong></td>
<td>“1+29”</td>
<td></td>
</tr>
<tr>
<td><strong>European Union</strong></td>
<td>“1+32”</td>
<td>“1+29” + Inositol + Carnitine + Fluoride</td>
</tr>
<tr>
<td><strong>Australia / New Zealand</strong></td>
<td>“1+28”</td>
<td>“1+29”</td>
</tr>
<tr>
<td><strong>Singapore</strong></td>
<td></td>
<td>- Choline</td>
</tr>
<tr>
<td><strong>Mainland</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>USA</strong></td>
<td>“1+31”</td>
<td>“1+29” - Selenium + Linoleic acid + Inositol + Water</td>
</tr>
</tbody>
</table>
Market situation

- 74% of infant formula products were found fulfilling “1+29” nutrition labelling requirement of Codex based on a check conducted in 2012
Nutrition labelling of infant formula

- According to CODEX STAN 72 – 1981, fluoride should not be added to infant formula. Its level should not exceed 100 µg/100 kcal or 24 µg/100 kJ in the infant formula prepared ready for consumption.

- Aus/NZ requires infant formula having exceeding level of fluoride to bear some sorts of warning statements to remind consumers on the risk of dental fluorosis.
Nutrition labelling of follow-up formula
Nutrition labelling of follow-up formula

- Propose to adopt nutrition labelling requirements of “1+25” (energy and 25 nutrients) laid down in CODEX STAN 156 – 1987
Nutrition labelling of foods intended for infants and young children
Nutrition labelling of foods intended for infants and young children

Proposed to mandate the labelling of such food with energy, protein, fat and carbohydrates, as well as other specified nutrients applicable to certain food categories, following the Codex requirements laid down in CODEX STAN 73 – 1981 and CODEX STAN 74 – 1981.
Labelling requirements in Codex Standards

<table>
<thead>
<tr>
<th>Nutrients</th>
<th>Cereal to be prepared with milk or nutritious liquid</th>
<th>Cereal with an added high protein food</th>
<th>Pasta</th>
<th>Rusk and biscuit</th>
<th>Canned baby food</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Protein</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Carbohydrates</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Fats</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Sodium</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Calcium</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Vitamin B1</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
<td>✓</td>
</tr>
<tr>
<td>Vitamin A</td>
<td>✓ (if added)</td>
<td>✓</td>
<td>✓</td>
<td>✓ (if added)</td>
<td>✓ (if added)</td>
</tr>
<tr>
<td>Vitamin D</td>
<td>✓ (if added)</td>
<td>✓</td>
<td>✓</td>
<td>✓ (if added)</td>
<td>✓ (if added)</td>
</tr>
<tr>
<td>Other nutrients</td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Nutrition labelling of foods intended for infants and young children

- Traders comment on the difficulty in providing substantiation on the cereal content of the foods for classification

- Considering to regulate such foods with same set of labelling requirements
Expression of energy and nutrients contents in NL

- Different expressions
  - per 100g / 100ml as sold
  - per serving
  - per 100ml as consumed
  - per 100kcal / 100kJ as consumed

- Unit of energy
  - kcal
  - kJ
  - kcal + kJ
Overseas requirements on expression of energy and nutrients contents in NL of infant formula

<table>
<thead>
<tr>
<th>Unit of food</th>
<th>Codex</th>
<th>EU</th>
<th>US</th>
<th>Australia/New Zealand</th>
<th>Singapore</th>
<th>Mainland China</th>
</tr>
</thead>
<tbody>
<tr>
<td>Energy</td>
<td>GS+GC</td>
<td>GC</td>
<td>*</td>
<td>GC</td>
<td>GC</td>
<td>G/S</td>
</tr>
<tr>
<td>Nutrients</td>
<td>GS+GC</td>
<td>GC</td>
<td>CC</td>
<td>GC</td>
<td>GC</td>
<td>G/S+JC</td>
</tr>
</tbody>
</table>

Energy

- kcal only
- kJ only
- kcal + kJ
- kcal and/or kJ
- not specified

Key: GS= per 100g (or 100 mL) as sold
    GC= per 100 mL as consumed
    G/S= per 100g (or 100 mL) or per serving
    CC= per 100 kcal as consumed
    JC= per 100kJ as consumed
    a/v = available
    * = to declare no. of fluid ounces supplying 100kcal
Language requirements in existing NL Scheme

- The nutrition label can be written in the English language, the Chinese language or in both languages, but numbers may be expressed in Arabic numerals.

- The nutrition label should be in both English and Chinese languages if both languages are used in the marking or labelling of the foods.
Way forward

- We suggest to include labelling requirements of different products in the proposed regulation with consideration of the comments from traders.
For comments and discussion