

Technical Guidance Notes on Nutrition Labelling and Nutrition Claims

Workshop on Nutrition Labelling Scheme

Centre for Food Safety

Overview

- Definitions
- Nutrition labelling
- Nutrition claim
- Indirect nutrient analysis
- Annex

Definitions

Definitions

- Terms are defined in the Amendment Regulation
- For example, “nutrient” means any substance present in food which –
 - (a) belongs to, or is a component of, one of the following categories –
protein; carbohydrates; fat; dietary fibre; vitamins; minerals; and
 - (b) satisfies any of the following conditions –
 - (i) the substance provides energy
 - (ii) the substance is needed for growth, development and normal functions of the body;
 - (iii) a deficit of the substance will cause characteristic bio-chemical or physiological changes to occur.

Nutrition Labelling

Nutrition Labelling

- Coverage
- Implementation time frame
- Information on nutrition label
 - Mandatory nutritional information
 - Nutrient content expression
 - Rounding rules
 - Nutrition labelling format
 - Compliance and tolerance limits

Information on Nutrition Label

- Table 1: Common names and abbreviations of selected nutrients

(P.7 of the
Technical
Guidance Notes)

Table 1 Common names and abbreviations of selected nutrients

| Information | Common Names and Abbreviations |
|-----------------------------|---|
| Energy | "Calories" / "Kilojoules" <i>(When "Calories" or "Kilojoules" is used instead of the term "Energy", the term must match with declaration of energy in the corresponding unit of energy.)</i> |
| Available carbohydrates | "Available Carbohydrates" / "Carbohydrates, Available" / "Carbohydrates" / "Available Carb" / "Carb, Available" / "Carb" / "Available CHO" / "CHO" / "CHO" |
| Total carbohydrates | "Total Carbohydrates" / "Carbohydrates, Total" / "Total Carb" / "Carb, Total" / "Total CHO" / "CHO, Total" |
| Total fat | "Fat" / "Total Fat" / "Fat, Total" |
| Saturated fatty acids | "Saturated Fat" / "Saturated Fatty Acids" / "Saturated" / "Saturates" / "Sat. fat" |
| Trans fatty acids | "Trans Fat" / "Trans" |
| Polyunsaturated fatty acids | "Polyunsaturated Fat" / "Polyunsaturated Fatty Acids" / "Polyunsaturated" / "Polyunsaturates" / "PUFA" |
| Monounsaturated fatty acids | "Monounsaturated Fat" / "Monounsaturated Fatty Acids" / "Monounsaturated" / "Monounsaturates" / "MUFA" |
| Cholesterol | "Cholst" / "Chol" |
| Dietary fibre | "Dietary fiber" / "Total dietary fibre" / "Total dietary fiber" / "Dietary Fibre" / "Fibre" / "Fiber" |
| Iodine | "Iodide" |
| Vitamin C | "Ascorbic acid" / "Vit. C" |
| Vitamin B1 | "Thiamine" / "Thiamin" / "Vit. B1" |
| Vitamin B2 | "Riboflavin" / "Vit. B2" |
| Vitamin B3 | "Niacin" / "Vit. B3" |
| Vitamin B12 | "Cobalamin" / "Vit. B12" |
| Folic acid | "Folate" / "Folacin" |
| Pantothenic acid | "Pantothenate" |

Nutrient Reference Values

Nutrient Reference Values set out in Schedule 7*

| <u>Energy/Nutrient</u> | <u>Nutrient reference value</u> | | |
|---------------------------|---------------------------------|-----------------------|-----|
| Energy (kcal) | 2 000 | Chromium (µg) | 50 |
| (kJ) | 8 400 | Molybdenum (µg) | 40 |
| Protein (g) | 60 | Fluoride (mg) | 1 |
| Total fat (g) | 60 | Vitamin A (µg RE) | 800 |
| Dietary fibre (g) | 25 | Vitamin C (mg) | 100 |
| Saturated fatty acids (g) | 20 | Vitamin D (µg) | 5 |
| Cholesterol (mg) | 300 | Vitamin E (mg α-TE) | 14 |
| Total carbohydrates (g) | 300 | Vitamin K (µg) | 80 |
| Calcium (mg) | 800 | Vitamin B1 (mg) | 1.4 |
| Phosphorus (mg) | 700 | Vitamin B2 (mg) | 1.4 |
| Potassium (mg) | 2 000 | Vitamin B6 (mg) | 1.4 |
| Sodium (mg) | 2 000 | Vitamin B12 (µg) | 2.4 |
| Iron (mg) | 15 | Niacin (mg) | 14 |
| Zinc (mg) | 15 | Folic acid (µg DFE) | 400 |
| Copper (mg) | 1.5 | Pantothenic acid (mg) | 5 |
| Iodine (µg) | 150 | Biotin (µg) | 30 |
| Selenium (µg) | 50 | Choline (mg) | 450 |
| Magnesium (mg) | 300 | | |
| Manganese (mg) | 3 | | |

(P.9 of the
Technical
Guidance
Notes)

Rounding Rules

Table 2 Units and Rounding Rules for Labelling of Selected Nutrients

| | Unit | Round to | Definition of “0” ² (per 100 g/mL) |
|---------------------------------------|------------|----------|---|
| Energy | kcal or kJ | 1 | ≤ 4 kcal or 17 kJ |
| Protein | g | 0.1 | ≤ 0.5 g |
| Carbohydrates (Available or Total) | g | 0.1 | ≤ 0.5 g |
| Total fat | g | 0.1 | ≤ 0.5 g |
| Saturated fatty acids | g | 0.1 | ≤ 0.5 g |
| Trans fatty acids | g | 0.1 | ≤ 0.3 g |
| Sodium | mg | 1 | ≤ 5 mg |
| Sugars | g | 0.1 | ≤ 0.5 g |
| Dietary Fibre | g | 0.1 | ≤ 1.0 g |
| Cholesterol | mg | 1 | ≤ 5 mg |

(P.11-12 of the Technical Guidance Notes)

Compliance and Tolerance Limits

(P.14 of the
Technical
Guidance
Notes)

Table 3 Tolerance limits for declaration of energy level or nutrient content on nutrition label

| Energy/ Nutrients | Tolerance Limits |
|--|-----------------------------|
| Energy, Total fat, Saturated fatty acids, Trans fatty acids, Cholesterol, Sodium, Sugars | $\leq 120\%$ declared value |
| Protein, Polyunsaturated fatty acids, Monounsaturated fatty acids, Carbohydrates, Starch, Dietary fibre, Soluble fibre, Insoluble fibre, individual component of fibre | $\geq 80\%$ declared value |
| Vitamins and minerals (other than Vitamin A, Vitamin D and added vitamins and minerals) | $\geq 80\%$ declared value |
| Vitamin A and Vitamin D (including added ones) | 80% - 180% declared value |
| Added vitamins and minerals (other than Vitamin A and Vitamin D) | \geq declared value |

Nutrition Claim

Nutrition Claim

- Coverage
- Nutrient Content Claim
- Nutrient Comparative Claim
- Nutrient Function Claim

Nutrient Content Claim

Table 4 Synonyms for Nutrient Content Claims

| Claim | Synonyms | Signs / Symbols |
|---------------------------|---|-----------------|
| Low | <ul style="list-style-type: none"> • Little • Low source • Few • Contains a small amount of | |
| Very low (Sodium only) | <ul style="list-style-type: none"> • Extremely low • Super low | |
| Free | <ul style="list-style-type: none"> • Zero / 0 • No • Contains no • Without • Off • Does not contain | • ✕ |
| Source | <ul style="list-style-type: none"> • Contains • Provides • Has • With | • ✓ |
| High | <ul style="list-style-type: none"> • High source • Good source of • A valuable source of • Rich in • Plenty of | |

(P.16 of the
Technical
Guidance Notes)

Nutrient Comparative Claim

(P.18-20)

Table 5 Conditions for Nutrient Comparative Claims

| Energy/Nutrients | Conditions (must meet both conditions) | |
|------------------|--|--|
| | Minimum Relative Difference | Minimum Absolute Difference |
| Energy | 25% | <ul style="list-style-type: none"> Solid food: Not less than 40 kcal (170 kJ) per 100 g of food Liquid food: Not less than 20 kcal (80kJ) per 100 mL of food |
| Protein | 25% | <ul style="list-style-type: none"> Solid food: (a) Not less than 10% Chinese NRV of protein per 100 g of food; (b) Not less than 5% Chinese NRV of protein per 100 kcal of food; or (c) Not less than 12% Chinese NRV of protein per 1 MJ of food. Liquid food: (a) Not less than 5% Chinese NRV of protein per 100 mL of food; (b) Not less than 5% Chinese NRV of protein per 100 kcal of food; or (c) Not less than 12% Chinese NRV of protein per 1 MJ of food |
| Total fat | 25% | <ul style="list-style-type: none"> Solid food: Not less than 3 g of total fat per 100 g of food Liquid food: Not less than 1.5 g of total fat per 100 mL of food |

| | | |
|---------------------------------------|-----------------|---|
| Saturated fatty acids | 25% | <ul style="list-style-type: none"> Solid food: Not less than 1.5 g of saturated fat and trans fat combined per 100 g of food Liquid food: Not less than 0.75 g of saturated fat and trans fat combined per 100 mL of food |
| Trans fatty acids | 25% | <ul style="list-style-type: none"> Solid / Liquid food: Not less than 0.3 g of trans fat per 100 g/mL of food |
| Cholesterol | 25% | <ul style="list-style-type: none"> Solid food: Not less than 0.02 g of cholesterol per 100 g of food Liquid food: Not less than 0.01 g of cholesterol per 100 mL of food |
| Sodium | 25% | <ul style="list-style-type: none"> Solid / Liquid food: Not less than 0.12 g of sodium per 100 g/mL of food |
| Sugars | 25% | <ul style="list-style-type: none"> Solid / Liquid food: Not less than 5 g of sugars per 100 g/mL of food |
| Dietary fibre | 25% | <ul style="list-style-type: none"> Solid food: Not less than 3 g of dietary fibre per 100 g of food Liquid food: Not less than 1.5 g of dietary fibre per 100 mL of food |
| Vitamins and Minerals (except sodium) | 10% Chinese NRV | <ul style="list-style-type: none"> Solid food: (a) Not less than 15% Chinese NRV of relevant vitamin or mineral per 100 g of food; (b) Not less than 5% Chinese NRV of relevant vitamin or mineral per 100 kcal of food; or (c) Not less than 12% Chinese NRV of relevant vitamin or mineral per 1 MJ of food. |

Nutrient Comparative Claim

Table 6 Synonyms for Nutrient Comparative Claims

| Claim | Synonyms | Signs / Symbols |
|--------|--|--|
| Less | <ul style="list-style-type: none"> • Light / Lite • Lower • Lower source • Fewer • Reduced • Contains less | <ul style="list-style-type: none"> • ↓ • - |
| Higher | <ul style="list-style-type: none"> • Extra • More • Additional • Added • Plus • Enriched • Fortified • Strengthened • Increased | <ul style="list-style-type: none"> • ↑ • + |

(P.21-22 of the Technical Guidance Notes)

Nutrient Function Claim

- Nutrient function claims must fulfill the following criteria –
 - The nutrient function claim is made on a nutrient with a NRV set out in Schedule 7 of the Amendment Regulation or with conditions for making nutrient content claims;
 - The nutrient function claim is based on scientific substantiation and scientific consensus;
 - The nutrient function claim must contain information on the physiological role of the claimed nutrient; and
 - The content of the claimed nutrients must meet the relevant condition of nutrient content claim for “source”, if applicable.

Indirect Nutrient Analysis

Indirect Nutrient Analysis

- Reference databases
- Procedures
- Reminders
- Limitations

Annex

Exemptions

- Annex1 :
Exemptions from Nutrition Labelling
(16 items)

Recommended Formats of Nutrition Label

■ Annex II :

(P. 29-42 of the
Technical
Guidance Notes)

| Nutrition Information | |
|-----------------------|--------------------------|
| | Per 100g or Per 100ml |
| Energy | kcal / kJ |
| Protein | g |
| Total fat | g |
| - Saturated fat | g |
| - Trans fat | g |
| Carbohydrates | g |
| - Sugars | g |
| Sodium | mg |

✿ Standard Format

Example of recommended format

| Nutrition Information 營養資料 | | | |
|--|---|------------------------|--|
| Servings Per Package / 每包裝所含食用分量數目: (insert number of servings) | | | |
| Serving Size / 食用分量: g, ml or other unit as appropriate/克、毫升或其他適當的單位 | | | |
| | Per 100g or Per 100ml / 每 100 克或每 100 毫升 | Per Serving / 每食用分量 | %Chinese NRV 每 100 克或 每 100 毫升的 中國營養素 參考值百分比 |
| Energy / 能量 | kcal or kJ / 千卡或千焦 | kcal or kJ/ 千卡或千焦 | % |
| Protein / 蛋白質 | g / 克 | g / 克 | % |
| Total fat / 總脂肪 | g / 克 | g / 克 | % |
| - Saturated fat / 飽和脂肪 | g / 克 | g / 克 | % |
| - Trans fat / 反式脂肪 | g / 克 | g / 克 | % |
| Carbohydrates / 碳水化合物 | g / 克 | g / 克 | % |
| - Sugars / 糖 | g / 克 | g / 克 | % |
| Sodium / 鈉 | mg / 毫克 | mg / 毫克 | % |
| Insert nutrient(s) involved in claim(s) / 填入涉及聲稱的營養素 | g, mg or µg 克、毫克或微克 | g, mg or µg 克、毫克或微克 | % |
| Insert other nutrient(s) to be declared / 填入其他標示的營養素 | g, mg or µg 克、毫克或微克 | g, mg or µg 克、毫克或微克 | % |

Standard Format

Example of recommended format

- ✿ Linear format (total surface area <200cm²)

Nutrition Information Per 100g or Per 100ml

Energy xx kcal / kJ, Protein xx g, Total fat xx g, Saturated fat xx g,

Trans fat xx g, Carbohydrates xx g, Sugars xx g, Sodium xx mg,

Insert nutrient(s) involved in claim(s) xx g, mg or µg, Insert other nutrient(s) to be declared xx g, mg or µg

Conditions for Nutrition Content Claims

■ Annex III:

(P. 43-46)

Annex III

CONDITIONS FOR NUTRIENT CONTENT CLAIMS

| Component | Description of the claim | Conditions ² |
|---------------|--------------------------|--|
| Energy | (1) with the word "Low" | (a) Solid food containing not more than 40 kcal (170 kJ) of energy per 100 g of food; or (b) liquid food containing not more than 20 kcal (80 kJ) of energy per 100 mL of food. |
| | (2) with the word "Free" | Liquid food containing not more than 4 kcal of energy (17 kJ) per 100 mL of food. |
| Fat | (1) with the word "Low" | (a) Solid food containing not more than 3 g of fat per 100 g of food; or (b) liquid food containing not more than 1.5 g of fat per 100 mL of food. |
| | (2) with the word "Free" | (a) Solid food containing not more than 0.5 g of fat per 100 g of food; or (b) liquid food containing not more than 0.5 g of fat per 100 mL of food. |
| Saturated Fat | (1) with the word "Low" | (a) Solid food containing – (i) not more than 1.5 g of saturated fat and trans fatty acids combined per 100 g of food; and (ii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy; or (b) Liquid food containing – (i) not more than 0.75 g of saturated fat and trans fatty acids combined per 100 mL of food; and (ii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. |
| | (2) with the word "Free" | (a) Solid food containing not more than 0.1 g of saturated fat and trans fatty acids combined per 100 g of food; or (b) liquid food containing not more than 0.1 g of saturated fat and trans fatty acids combined per 100 mL of food. |

Conditions for Nutrition Content Claims

| Component | Description of the claim | Conditions ² |
|-------------|--------------------------|--|
| Trans Fat | (1) with the word "Free" | <p>(a) Solid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.3 g of trans fat per 100 g of food; (ii) not more than 1.5 g of saturated fat and trans fatty acids combined per 100 g of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. <p>(b) Liquid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.3 g of trans fat per 100 mL of food; (ii) not more than 0.75 g of saturated fat and trans fatty acids combined per 100 mL of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. |
| | (2) with the word "Low" | <p>(a) Solid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.02 g of cholesterol per 100 g of food; (ii) not more than 1.5 g of saturated fat and trans fatty acids combined per 100 g of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. <p>(b) Liquid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.01 g of cholesterol per 100 mL of food; (ii) not more than 0.75 g saturated fat and trans fatty acids combined per 100 mL of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. |
| Cholesterol | (1) with the word "Low" | <p>(a) Solid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.02 g of cholesterol per 100 g of food; (ii) not more than 1.5 g of saturated fat and trans fatty acids combined per 100 g of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. <p>(b) Liquid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.01 g of cholesterol per 100 mL of food; (ii) not more than 0.75 g saturated fat and trans fatty acids combined per 100 mL of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. |
| | (2) with the word "Free" | <p>(a) Solid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.005 g of cholesterol per 100 g of food; (ii) not more than 1.5 g of saturated fat and trans fatty acids combined per 100 g of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. <p>(b) Liquid food containing –</p> <ul style="list-style-type: none"> (i) not more than 0.005 g of cholesterol per 100 mL of food; |



Conditions for Nutrition Content Claims

| Component | Description of the claim | Conditions ⁵ |
|-----------|------------------------------|--|
| | | (ii) not more than 0.75 g saturated fat and trans fatty acids combined per 100 mL of food; and (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy. |
| Sugars | (1) with the word "Low" | (a) Solid food containing not more than 5 g of sugars per 100 g of food; or (b) liquid food containing not more than 5 g of sugars per 100 mL of food. |
| | (2) with the word "Free" | (a) Solid food containing not more than 0.5 g of sugars per 100 g of food; or (b) liquid food containing not more than 0.5 g of sugars per 100 mL of food. |
| Sodium | (1) with the word "Low" | Food, solid or liquid, containing not more than 0.12 g of sodium per 100 g/mL of food. |
| | (2) with the word "Very low" | Food, solid or liquid, containing not more than 0.04 g of sodium per 100 g/mL of food. |
| | (3) with the word "Free" | Food, solid or liquid, containing not more than 0.005 g of sodium per 100 g/mL of food. |
| Protein | (1) with the word "Low" | Food, solid or liquid, containing protein which contributes not more than 5% of energy. |
| | (2) with the word "Source" | (a) Solid food containing not less than 10% of the Chinese NRV of protein per 100 g of food; or (b) liquid food containing not less than 5% of the Chinese NRV of protein per 100 mL of food; or (c) food, solid or liquid, containing not less than 5% of the Chinese NRV of protein per 100 kcal of food (12% of the Chinese NRV of protein per 1 MJ of food). |
| | (3) with the word "High" | (a) Solid food containing not less than 20% of the Chinese NRV of protein per 100 g of food; or (b) liquid food containing not less than 10% of the Chinese NRV of protein per 100 mL of food; or (c) food, solid or liquid, containing not less than 10% of the Chinese NRV of protein per 100 kcal of food (24% of the Chinese NRV of protein per 1 MJ of food). |

Conditions for Nutrition Content Claims

| Component | Description of the claim | Conditions ² |
|--|----------------------------|--|
| Vitamins and Minerals (Except Sodium) | (1) with the word “Source” | (a) Solid food containing not less than 15% of the Chinese NRV of the vitamin or mineral concerned per 100 g of food; or |
| | | (b) liquid food containing not less than 7.5% of the Chinese NRV of the vitamin or mineral concerned per 100 mL food; or |
| | (2) with the word “High” | (c) food, solid or liquid, containing not less than 5% of the Chinese NRV of the vitamin or mineral concerned per 100 kcal of food (12% of the Chinese NRV of the vitamin or mineral concerned per 1 MJ of food). |
| | | (a) Solid food containing not less than 30% of the Chinese NRV of the vitamin or mineral concerned per 100 g of food; or |
| Dietary Fibre | (1) with the word “Source” | (b) liquid food containing not less than 15% of the Chinese NRV of the vitamin or mineral concerned per 100 mL food; or; |
| | | (c) food, liquid or solid, containing not less than 10% of the Chinese NRV of the vitamin or mineral concerned per 100 kcal of food (24% of the Chinese NRV of the vitamin or mineral concerned per 1 MJ of food). |
| | (2) with the word “High” | (a) Solid food containing not less than 3 g of dietary fibre per 100 g of food; or |
| | | (b) liquid food containing not less than 1.5 g of dietary fibre per 100 mL of food. |
| | (2) with the word “High” | (a) Solid food containing not less than 6 g of dietary fibre per 100 g of food; or |
| | | (b) liquid food containing not less than 3 g of dietary fibre per 100 mL of food. |

Annex

- Annex IV :
Frequently Asked Questions
- Annex V :
Guidance Notes on Exemption from
Nutrition Labelling Under Small Sales
Volume Scheme
 - Details of the scheme
 - Label Requirements

Technical Guidance Notes

- Chinese and English versions are uploaded on Centre for Food Safety website in June 2008:

(Chinese Version)

http://www.cfs.gov.hk/tc_chi/food_leg/food_leg_nl_guidance.html

(English Version)

http://www.cfs.gov.hk/english/food_leg/food_leg_nl_guidance.html

Technical Guidance Notes

- Provide technical information and answer some of the most frequently asked questions, in order to assist the trade in formulating nutrition labels
- Not a part of the legislation, and should be read in conjunction with the legislation including but not limited to the Amendment Regulation
- Special issues should be considered on a case-by-case basis
- Other frequently asked questions and relevant information have been uploaded on the website of the Centre for Food Safety



Thank you