

# Nutrition Labelling Scheme in Hong Kong

## Workshop on Nutrition Labelling Scheme

Centre for Food Safety

# Background

# What is Nutrition Label?

- List out the nutrient content systemically
- Usually in tabular format
- Different ways of presentation are required by different countries

Nutrition Information 營養資料	
Per 100ml / 每100毫升	
Energy / 熱量	52 kcal / 千卡
Protein / 蛋白質	0 g / 克
Fat, total / 脂肪總量	0 g / 克
- Saturated fat / 飽和脂肪	0 g / 克
Cholesterol / 膽固醇	0 mg / 毫克
Carbohydrate / 碳水化合物	13 g / 克
- Sugars / 糖	9.5 g / 克
Dietary fibre / 膳食纖維	0.5 g / 克
Sodium / 鈉	2 mg / 毫克
Calcium / 鈣	2 mg / 毫克

# International Situation

- Increasing number of countries/regions implement nutrition labelling scheme
- Nutrition labelling is mandatory in some developed countries (including US, Australia)
- In some other countries, nutrition labelling is mandatory when there is nutrient-related claims on prepackaged food (including EU countries, Singapore)

# [ Local Situation-Nutrition Labelling ]

- Amendment Regulation on Nutrition Labelling will come into force on 1 July 2010
- Currently, only some food have nutrition label on the package
- Various types of nutrition labels with different contents, expressions and formats found in the local market
- Difficult for consumers to use the nutrition labels and compare products; some claims may even be misleading or deceptive

# Nutrition Labelling Scheme

# Aims of the Scheme

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

# Scope

- General prepackaged food
- Not applicable to:
  - Formula and food intended to be consumed by children under the age of 36 months
  - Food for special dietary uses

Mandatory for all prepackaged food unless exempted



# What are “Prepackaged Food”?

- Any food packaged, whether completely or partially, in such a way that
  - (a) the contents cannot be altered without opening or changing the packaging; and
  - (b) the food is ready for presentation to the ultimate consumer or a catering establishment as a single food item.
- The following products do not require a nutrition label:
  - Bread and cakes that are not packed and just put in packaging for customers at the point of sale
  - Bread and cakes put in packaging that the opening is neither sealed nor tied up with metal wire, adhesive tape or expiry date hook.



# How to judge which are “foods for special dietary use”?

- The food should meet the following criteria :
  - Composition must differ significantly from that of ordinary foods of comparable nature
  - Specially processed or formulated to satisfy particular dietary requirements which exist because of a particular physical or physiological condition and/or specific disease and disorder, and is presented as such

# How to judge which are “foods for special dietary use”?

## ■ Example 1 : Milk powder for pregnant women

- specially formulated to satisfy dietary requirement of pregnant women
- composition significantly different from ordinary milk powder
- clearly indicate the food is for pregnant women to satisfy their special dietary requirement ✓
- generally not consumed by other people

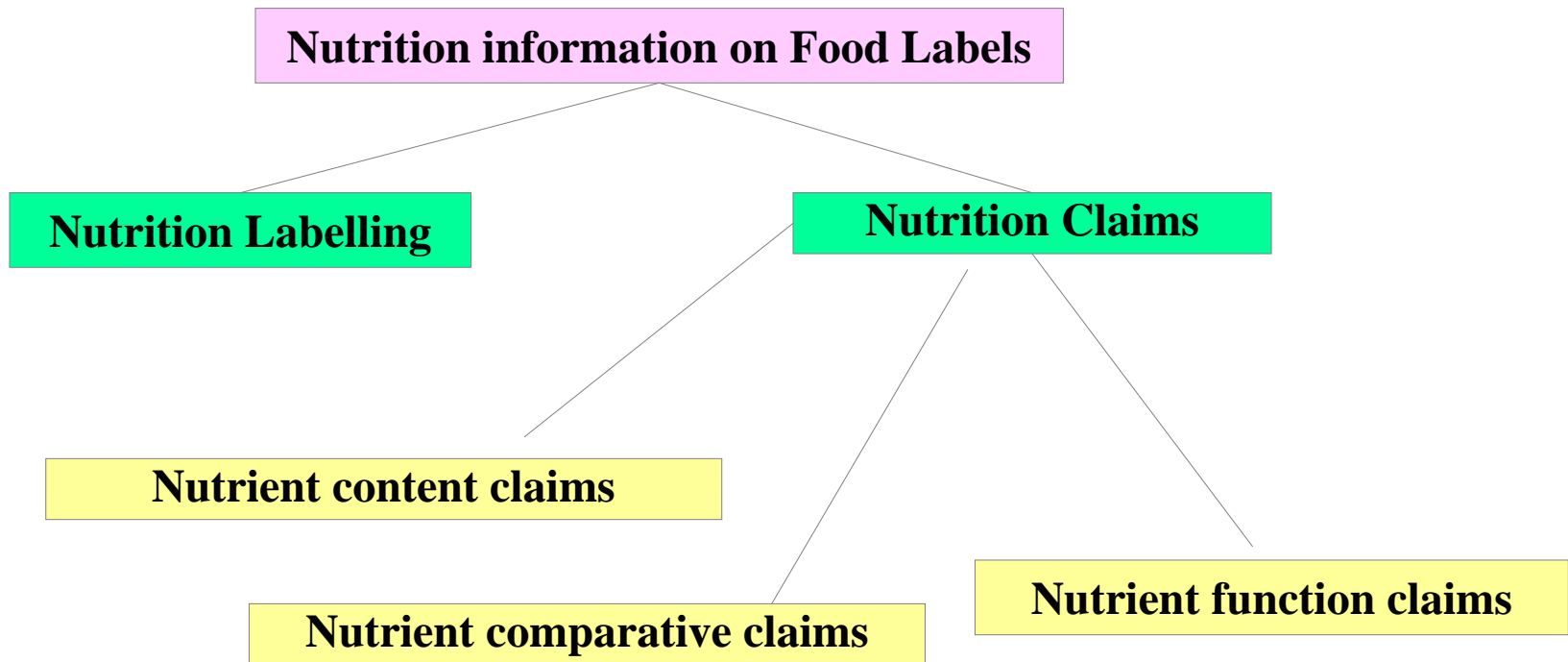
## ■ Example 2 : Protein powder

- not specially formulated to satisfy particular dietary requirements of particular physical or physiological condition or specific disease and disorder
- not clearly indicated that the food is only for particular group of consumers to satisfy their special dietary requirement
- may/can be consumed by the general population ✗

## ■ Example 3 : Sugar-free throat soothing pastilles

- not specially formulated to satisfy particular dietary requirements of particular physical or physiological condition or specific disease and disorder
- not clearly indicated that the food is only for particular group of consumers to satisfy their special dietary requirement
- “Suitable for diabetes” ✗
- may/can be consumed by the general population

# Food and Drugs (Composition and Labelling) (Amendment: Requirements for Nutrition Labelling and Nutrition Claim) Regulation 2008



# Required Nutrients on Nutrition Labels

- 1+7 (energy +7 core nutrients) –  
i.e., energy, protein, carbohydrate\*, total fat, sodium,  
saturated fat, trans fat, 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

\*The amount of carbohydrate can be declared as “available carbohydrate” or “total carbohydrate”. However, if declared as “total carbohydrate”, the dietary fibre content must be declared as well.

# Required Nutrients on NL - Expressions

- Per 100 g (or 100 ml); or
- 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)

# Required Nutrients on NL - Expressions

- Energy value – allow kcal or kJ
  - Nutrients – in gram, milligram or microgram
- \* Encourage the trade to apply the same expression method to declare any other nutrients

# Energy/Nutrients Expression

- Other than expressing energy value in kcal or kJ, or expressing nutrients in gram, milligram or microgram, energy value and nutrients can be expressed in % Nutrient Reference Value (%NRV)
- Must use Chinese NRV or any other reference value adopted by any national or international health authority when calculating the % NRV on nutrition label



# What are the requirements on the format of nutrition labels ?

- Place in a conspicuous place on the package
- Present nutrition information in tabular format (linear format allowed if total surface area <math><200\text{ cm}^2</math>)
- Display appropriate heading (e.g. “Nutrition Label”, “Nutrition Information”, “Nutrition Facts” etc.)
- No legal requirement on label size, font size, and order of listing of nutrients in the label
- Examples of recommended formats are included in the Technical Guidance Notes

Other formats fulfilling the requirements of the Amendment Regulation would be acceptable

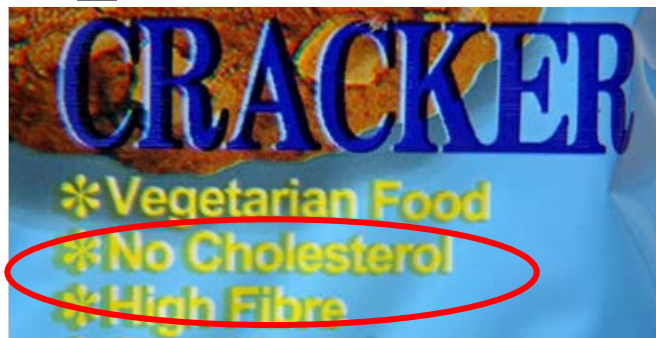
Chinese/English/ Chinese and English

# Nutrition Claim

- Means any representation which states, suggests or implies that a food has particular nutritional properties
- Generally follow Codex standards
- Nutrition claims include:
  - Nutrient content claim
  - Nutrient comparative claim
  - Nutrient function claim

Food labels and advertisement are subject to the control

# Examples of Permitted Nutrition Claims



UHT **LOW FAT** MILK DRINK  
INGREDIENTS: SKIMMED MILK AND WHOLE MILK  
低脂牛奶飲品  
成份：脱脂奶，全脂奶



# Nutrient Content Claim – Examples



# Nutrient Content Claim

- Describes the energy value or the content level of a nutrient contained in a food
- Adopt nutrient content claims in Codex and allow the ones commonly found in the local market, e.g., “low sugar”, “low protein” and “trans fat free”



# Permitted Nutrient Content Claims

- Energy (low, free)
- Total fat (low, free)  
[Allow “xx% fat free”, but must meet the conditions for “low fat”]
- Saturated fatty acids (low, free)
- Cholesterol (low, free)
- Trans fatty acids (free)
- Sugars (low, free)
- Sodium (low, very low, free)
- Protein (low, source, high)
- Vitamins and minerals [except sodium] (source, high)
- Dietary fibre (source, high)

# Nutrient Comparative Claim- Examples



# Nutrient Comparative Claim

- Means a nutrition claim that describes the energy value or the content level of a nutrient in different versions of the same food or similar food
- E.g., Less fat – Contain 25% less fat as compared to the regular product of the same brand
- Nutrients for making nutrient comparative claims must have conditions under the nutrient content claim



# Nutrient Function Claim- Examples

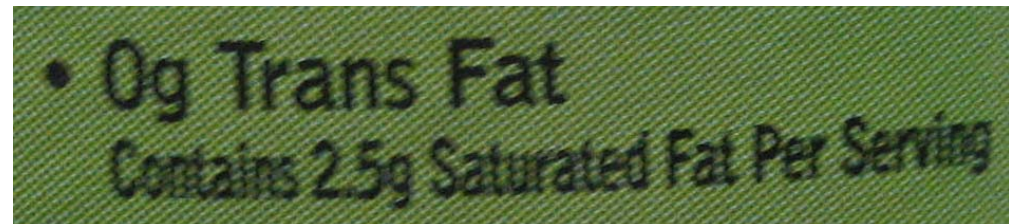


# Nutrient function claim

- Means a nutrition claim that describes the physiological role of a nutrient in growth, development and normal functions of the body
- E.g., Calcium aids the development of strong bones and teeth
- Nutrients for making nutrient function claims must have a Chinese NRV or conditions for making nutrient content claims
- Examples of acceptable nutrient function claim available from CFS's website

# Other Declarations

- Will not allow selected nutrient content claims as there are no international consensus (such as “Omega-3”)
- Allow the expressions of energy value/nutrients in actual amounts provided that the expressions do not place any special emphasis on the high content, low content, presence or absence of energy or that nutrient contained in the food (e.g. contain xx mg of omega-3 per 100 gram)



# Other Declarations

- Mentioning of information on lactose and gluten do not constitute a nutrition claim

低乳糖

Produced in a nut-free environment  
Suitable for Vegetarians/Vegans  
Dairy and Lactose free  
Non-GM Soya beans

LOW LACTOSE

✓ OVEN BAKED  
✓ CHOLESTEROL FREE  
✓ GLUTEN FREE  
✓ LOW IN SATURATED FAT  
✓ SUITABLE FOR VEGETARIANS

GLUTEN FREE

# Other Declarations

- Do not affect “Organic” or “Natural” labels



# Other Declarations

- The followings are not considered as nutrition claims:
  - “No MSG”
  - “No hydrogenated oil”
  - “Caffeine-free”
  - “With electrolytes”
  - “Unsweetened” / “Less sweet”
  - “Casein free”
  - “Contains phenylalanine”
  - Claims on glycaemic index
  - Non GM

# Exemptions- Principles

- Practical difficulty for the trade
  - *e.g., prepackaged food packed in a container which has a total surface area of less than 100cm<sup>2</sup>*
- The food does not contain (meeting definition of zero) of energy and core nutrients
- Selected food which are fresh in nature without any addition of ingredient, and is not subject to processing
  - *e.g., fresh and dried fruits and vegetables*
- Prepackaged food with small sales volume

# Exempt Items

1. Prepackaged food with an alcoholic strength by volume of more than 1.2% as determined in the manner described in the definition of “alcoholic strength” in section 53 of the Dutiable Commodities Ordinance (Cap. 109).
2. Prepackaged food sold at a catering establishment which is usually bought for immediate consumption.
3. Individually wrapped confectionery products in a fancy form intended for sale as single items.
4. Individually wrapped preserved fruits which are not enclosed in any further packaging and which are intended for sale as single items.
5. Prepackaged food packed in a container which has a total surface area of less than 100 cm<sup>2</sup>.



# Exempt Items

6. Fruit or vegetable, whether fresh, chilled, frozen or dried –
  - (a) packed in a container which contains no other ingredient; and
  - (b) to which no other ingredient has been added.
7. Carbonated water –
  - (a) to which no ingredient other than carbon dioxide has been added; and
  - (b) the marking or label of which indicates that it has been carbonated.
8. Spring water and mineral water (including water to which minerals have been artificially added and which is described as mineral water).
9. Prepackaged food which does not have any energy value or contain any content of any core nutrients

# Exempt Items

10. Meat, marine or fresh water fish or any other form of aquatic life commonly used for human consumption –
  - (a) which is in a raw state;
  - (b) packed in a container which contains no other ingredient; and
  - (c) to which no other ingredient has been added.
11. Prepackaged food containing assorted ingredients which is –
  - (a) prepared and sold to an ultimate consumer at the same premises;
  - (b) not intended for sale for immediate consumption; and
  - (c) intended to be subjected to a process of cooking for the purpose of rendering it fit for human consumption.

# Exempt Items

12. Soup pack containing assorted ingredients –
  - (a) which has not been subjected to any process of heating in the course of manufacture;
  - (b) which is not intended for sale for immediate consumption; and
  - (c) which is intended to be subjected to a process of cooking for the purpose of rendering it fit for human consumption in the form of soup.
13. Prepackaged food sold –
  - (a) by a charitable institution or trust of a public character which is exempt from tax under section 88 of the Inland Revenue Ordinance (Cap. 112); and
  - (b) in an event held for charitable purposes.

# Exempt Items

## 14. Prepackaged food –

(a) processed and sold to an ultimate consumer at the same premises; or

(b) processed at a place which is adjacent to, or in the immediate vicinity of, the premises where the food is sold to an ultimate consumer, and not offered for sale outside the premises referred to in paragraph (a) or (b).

## 15. Prepackaged food sold to a catering establishment as a single item.

## 16. Prepackaged food with annual sales volume not exceeding 30000 units *(The trade must apply for prior approval from CFS and subject to other conditions, such as submitting monthly sales data, etc)*

# Note:

- Exempt Item 16 (small volume exemption) :  
If there is any nutrition claim on the food label/in the advertisement, the exemption status will be removed
- Exempt Items 1-15 :  
If there is any nutrition label or any nutrition claim on the food label/in the advertisement, the exemption status will be removed

# Penalties

- Any person breaching relevant regulation on nutrition labelling and nutrition claims commits an offence and is liable to a maximum penalty of :
  - A fine at level 5 (HK\$50,000); and
  - Imprisonment for 6 months

# Assistance to Trade?

- Technical guidance notes
- Method guidance notes
- Workshops
- Hotline
  - 24-Hour Hotline: 2868 0000
  - Helpdesk: 2381 6096
- Online resources ([www.cfs.gov.hk](http://www.cfs.gov.hk)):
  - Frequently Asked Questions
  - Other information, e.g., Nutrition Label Calculator

# Time Frame

- About 2 years grace period
- Come into force on 1 July 2010  
(all prepackage food must have a nutrition label from this date onwards)



~ Thank you ~