

**Food and Drugs (Composition and Labelling) (Amendment) Regulation
2025**

**Trade Guidelines on Regulation of Konjac-containing Jelly
Confectionery**

(XX 2025)

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Confectionery**

Centre for Food Safety
Food and Environmental Hygiene Department
The Government of the HKSAR
XX 2025

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Chapter 1 Introduction

Purpose

1.1 This set of Guidelines aims to assist the trade in having a better understanding of and complying with the relevant requirements under the Food and Drugs (Composition and Labelling) (Amendment) Regulation 2025 regarding the regulation of konjac-containing jelly confectionery.

Background

1.2 Jelly confectionery products in the market may contain the ingredient konjac, which is the substance that bears the identification number “425” under the International Numbering System for Food Additives, and is also known as conjac, konnyaku, yam flour or glucomannan in English. The Codex Alimentarius Commission (“Codex”) considers konjac a safe food additive, which is usually used as a thickener, emulsifier, stabiliser, etc. However, improper consumption of mini-cup konjac jellies can increase the choking risk, particularly for children and the elderly people, due to their unique product design and firm texture.

1.3 The Government has been promoting health education messages on prevention of food choking through various channels, including advice against slurping mini-cup konjac-containing jelly confectionery directly. The Centre for Food Safety (CFS), having reviewed the potential choking risks associated with the consumption of mini-cup konjac-containing jelly confectionery products and the regulatory practices of major economies concerning such products, considers it necessary to amend the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), with a view to safeguarding public health.

Disclaimer

1.4 The Guidelines, which should be read in conjunction with the Food and Drugs (Composition and Labelling) (Amendment) Regulation 2025 (“Amendment Regulation”), is intended for use as a general reference only.

Information contained in the Guidelines may not be exhaustive or complete. Specific issues should be considered on a case-by-case basis. The Guidelines does not have the force of the law and should not be interpreted in any manner which would override the provisions of the Amendment Regulation. In case of any inconsistency, the statutory provisions will prevail. The Guidelines should not be regarded as legal advice. If you need legal advice, you must contact your own lawyer.

1.5 The Guidelines may be amended or supplemented by the Director of Food and Environmental Hygiene as necessary from time to time.

Key features of the Food and Drugs (Composition and Labelling) (Amendment) Regulation 2025

1.6 The Amendment Regulation was published in the Gazette on 18 July 2025 (L.N. 159 of 2025), and passed by the Legislative Council. The Amendment Regulation stipulates the composition and labelling requirements for prepackaged jelly confectionery containing konjac, and will take effect on 1 April 2026.

Definition

1.7 The followings are some terms defined in the Amendment Regulation and the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W) –

Konjac means the substance that bears the identification number “425” under the International Numbering System for Food Additives.

Prepackaged food means 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.

Chapter 2 Interpretation of the Composition Requirement for Mini-cup Jelly Confectionery Products

2.1 As stipulated in Schedule 1 of the Amendment Regulation, jelly confectionery that is prepackaged food and that is packed in a mini-cup-shaped container must not contain konjac if the height or width of the container does not exceed 45mm. Therefore, mini-cup konjac-containing jelly confectionery with a height or width not exceeding 45mm will be prohibited for sale in the local market.

Measurement on the height and width of mini-cup

2.2 For this Regulation, “height” of a mini-cup refers to the maximum internal vertical distance from the base to the opening. Meanwhile, “width” refers to either the inner diameter or the maximum inner width of the opening. Figure 1 and Figure 2 show examples of how the height and width of mini-cups are measured.

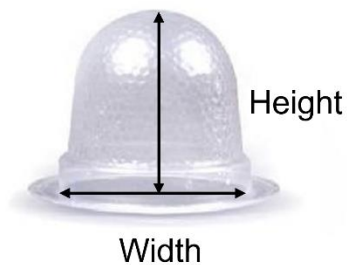


Figure 1: Illustration demonstrating the measurement of mini-cup with circular opening.



Figure 2: Illustration demonstrating the measurement of mini-cup with non-circular opening. The maximum inner width refers to the longest distance from the inner wall on one side of the cup rim to the inner wall on the opposite side.

Non-mini-cup konjac jelly

2.3 This composition requirement and the related sale prohibition do not apply to non-mini-cup konjac-containing jelly confectionery, such as those in pouches, sachets, tubular or pillow shapes, and those meant to be consumed using cutlery. However, these products should comply with the specific labelling requirements stipulated in Schedule 2 of the Amendment Regulation.



Figure 3: Examples of konjac jelly products that are not subject to the composition requirement of the Amendment Regulation.

Chapter 3 Labelling of Konjac-containing Jelly Confectionery

3.1 According to the Amendment Regulation, all prepackaged konjac-containing jelly confectionery products must be clearly and legibly labelled with warning statements on prevention of choking hazard in both English and Chinese, on their outer packaging. The warning statements should read as follows:

注意：勿一口吞食，長者及兒童須在監護下食用。

Caution: Do not swallow whole. Elderly and children must consume under supervision.

3.2 To enhance visibility, the warning statements must be marked in a conspicuous position on the packaging and be:

- (a) underlined and marked
 - (i) in dark colour on a light-coloured background; or
 - (ii) in light colour on a dark-coloured background; or
- (b) marked in red text on a white or yellow background.

Warning statements on prevention of choking hazard

- Underlined dark-coloured text on a light-coloured background

Example:

注意：勿一口吞食，長者及兒童須在監護下食用。

Caution: Do not swallow whole. Elderly and children must consume under supervision.

Or

- Underlined light-coloured text on a dark-coloured background

Example:

注意：勿一口吞食，長者及兒童須在監護下食用。

Caution: Do not swallow whole. Elderly and children must consume under supervision.

Or

- Red text on a yellow background

注意：勿一口吞食，長者及兒童須在監護下食用。

Caution: Do not swallow whole. Elderly and children must consume under supervision.

Or

- Red text on a white background

注意：勿一口吞食，長者及兒童須在監護下食用。

Caution: Do not swallow whole. Elderly and children must consume under supervision.

Elements of legible warning label

3.3 Legible warning labels can reduce the risk of choking by providing clear instructions and safety precautions for the consumption of konjac jelly. A legible warning label should contain the following elements:

(i) Suitable font size

A font size of at least 3 mm in height for English letter and Chinese characters is recommended.

Example:

注意：勿一口吞食，長者及兒童須在監護下食用。

Caution: Do not swallow whole. Elderly and children must consume under supervision.

3 mm

3 mm

(ii) Enough spacing

Words and characters should be displayed in such a manner that they never touch each other or the lines and borders surrounding or separating the information, if any.

3.4 Apart from the above elements, it is also noted that the clarity of words may be enhanced by other relevant factors such as appropriate font type, suitable printing technology and nonreflective printing surface.

Advice to the trade

3.5 Traders must adhere to the labelling requirements for the warning statement on prevention of choking hazard as stipulated in the Amendment Regulation. They should observe the elements of legible food labels and make reference to the above examples when preparing food labels for their prepackaged products in order to comply with the legibility requirement of

the food labelling regulation.

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