

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

Trade Guidelines on Regulation of Konjac-containing Jelly Confectionery

February 2026

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Confectionery**

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

	Page
Chapter 1 Introduction	1
Purpose	1
Background	1
Disclaimer	2
Key features of the Food and Drugs (Composition and Labelling) (Amendment) Regulation 2025	2
Definitions	2
Chapter 2 Interpretation of the Composition Requirement for Mini-cup Jelly Confectionery Products	4
Mini-cup	4
Measurement on the height and width of mini-cup	5
Non-mini-cup konjac jelly	6
Chapter 3 Labelling of Konjac-containing Jelly Confectionery	7
Warning statements on prevention of choking hazard	7
Elements of legible warning label	8
Advice to the trade	9
Chapter 4 Frequently Asked Questions	10

Chapter 1 Introduction

Purpose

1.1 This set of Guidelines aims to assist the trade in having a better understanding of the Food and Drugs (Composition and Labelling) (Amendment) Regulation 2025 (“the Amendment Regulation”) regarding the regulation of konjac-containing jelly confectionery and complying with the relevant requirements under the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W) as amended by the Amendment Regulation (“the Amended Regulations”).

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 relevant legislation, 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 any legislation. 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 completed the negative vetting procedure of the Legislative Council on 20 August 2025. The Amendment Regulation amends the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W) to provide for the composition and labelling requirements for prepackaged jelly confectionery containing konjac, and will take effect on 1 April 2026.

Definitions

1.7 According to the Amended Regulations –

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 item 8A of Schedule 1 to the Amended Regulations, 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.

Mini-cup

2.2 Mini-cups are containers that can hold jelly confectionery intended to be ingested in a single bite, e.g., by exerting pressure on the mini-cups to project the confectionery into the mouth. Examples of mini-cup konjac jelly and non-mini-cup konjac jelly are shown in Figure 1 and Figure 2, respectively.



Figure 1: Examples of mini-cup konjac jelly products.



Figure 2: Examples of non-mini-cup konjac jelly products.

Measurement on the height and width of mini-cup

2.3 For the Amended Regulations, “height” of a mini-cup-shaped container refers to the maximum vertical distance from the base to the opening. Meanwhile, “width” refers to the longest distance from one side of the opening to the opposite side. Figure 3 shows an example of how the height and width of mini-cup-shaped containers are measured.

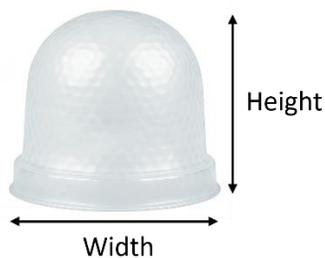


Figure 3: Illustration demonstrating the measurement of mini-cup with circular opening.

Non-mini-cup konjac jelly

2.4 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 (see Figure 2). However, these products should comply with the specific labelling requirements stipulated in Schedule 2 to the Amended Regulations (see Chapter 3 below).

Chapter 3 Labelling of Konjac-containing Jelly Confectionery

3.1 According to the Amended Regulations, 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:

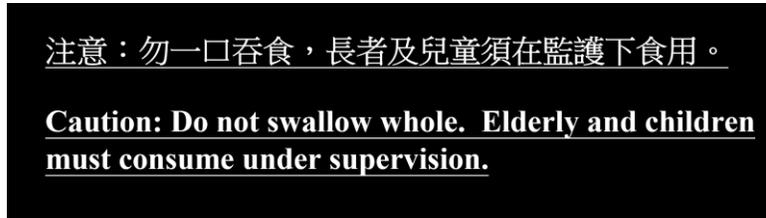
注意：勿一口吞食，長者及兒童須在監護下食用。

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

Or

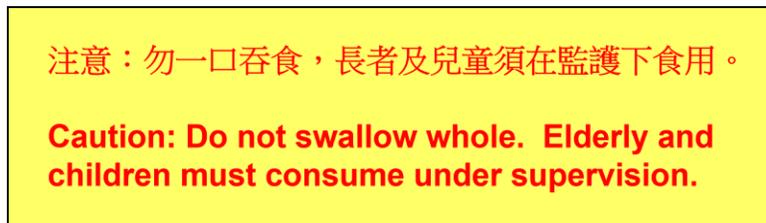
- Underlined light-coloured text on a dark-coloured background

Example:



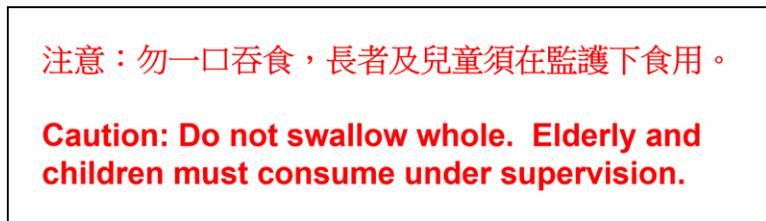
Or

- Red text on a yellow background



Or

- Red text on a white background



Elements of legible warning label

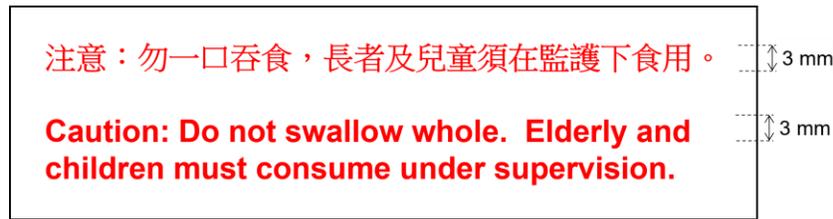
3.3 Legible warning labels can reduce the risk of choking by providing clear instructions and safety precautions for the consumption of konjac jelly.

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:



(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 Amended Regulations. 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.

Chapter 4 Frequently Asked Questions

1. What products are covered by the Amendment Regulation?

Prepackaged confectionery with a jelly-like texture that contains konjac is subject to the new regulatory requirements introduced under the Amendment Regulation. Below are examples of products that are outside the regulatory scope of the Amendment Regulation:

- Non-prepackaged products;
- Jelly confectionery that does not contain konjac;
- Products that contain konjac but are not jelly confectionery (e.g. Shirataki noodles /konjac noodles, konjac rice, and beverages containing konjac)

2. Does “konjac” in the Amended Regulations only refer to konjac powder?

Konjac is an ingredient that can serve as an additive with the identification number “425” under the International Numbering System for Food Additives. Under the Amended Regulations, prepackaged jelly confectionery that is packed in a mini-cup-shaped container with a height or width not exceeding 45mm must not contain konjac, regardless of whether konjac is used as an additive in the confectionery, or is in powder or other form.

It is worth noting that if konjac serves as an additive in food, it should be labelled in accordance with the existing paragraph 2(5) and (6) of Schedule 3 to the Food and Drugs (Composition and Labelling) Regulations, Cap.132W. However, if konjac is added as an ingredient rather than functions as an additive in food, it shall be included in the list of ingredients, although there is no need to specify its functional class.

3. Is prepackaged konjac jelly confectionery served by restaurants for dine-in service subject to the Amendment Regulation?

The scope of the Amendment Regulation covers prepackaged jelly

confectionery containing konjac. Prepackaged konjac jelly confectionery sold by restaurants for consumption on premises (i.e., dine-in) must also comply with the relevant labelling requirements introduced under the Amendment Regulation.

4. **The Amended Regulations stipulates that the warning statement on prevention of choking hazard must be labelled in both Chinese and English. Does this mean the product name, ingredients, nutrition label, etc. of konjac jelly confectionery products also need to be labelled in both Chinese and English?**

The requirement for all prepackaged konjac-containing jelly confectionery products to be clearly and legibly labelled with warning statement on prevention of choking hazard in both Chinese and English on their outer packaging is stipulated in Schedule 2 to the Amended Regulations. The language requirements for the name of the food, the list of ingredients and the list of nutrients, which are stipulated in Schedules 3 and 5 to the existing Cap. 132W, will not be affected by the requirement of carrying a bilingual warning statement on prepackaged konjac-containing jelly confectionery products.

5. **The Amended Regulations stipulates that prepackaged jelly confectionery containing konjac must be labelled with specific warning statement on prevention of choking hazard. Is it permissible to use similar warnings with different wording?**

The Amended Regulations stipulates that the outermost layer of packaging for sale of jelly confectionery that is prepackaged food and that contains konjac must be clearly and legibly marked with the following words in both Chinese and English –

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

「注意：勿一口吞食，長者及兒童須在監護下食用。」

The trade should label the warning statement as above in accordance with the requirements stipulated in the Amended Regulations.

- 6. Is it required to display the warning statement on prevention of choking hazard on a separate label, or can it be included with other product information on the same label?**

The warning statement can be presented as a stand-alone label or as part of a label. It is important to note that the warning statement must be marked in a conspicuous position on the packaging and meet all labelling requirements stipulated in the Amended Regulations.

- 7. Are konjac-containing jelly confectionery products required to be labelled with the warning statement on prevention of choking hazard on each individual packaging?**

The Amended Regulations stipulates that the outermost layer of prepackaged jelly confectionery containing konjac must be clearly and legibly marked with the warning statement on choking prevention in both Chinese and English. However, if the entire package is unpacked as individual units for sale, each individual package will be considered a separate sales unit and the warning statement must be labelled on each package.

- 8. According to the Amended Regulations, the warning statement on prevention of choking hazard must be marked in a conspicuous position on the packaging. Does "conspicuous position" refer to the front of the packaging?**

According to the Amended Regulations, the outermost layer of prepackaged jelly confectionery containing konjac must be clearly and legibly marked with the warning statement on choking prevention in both Chinese and English. The warning statement must be marked in a conspicuous position on the packaging. However, the Amended Regulations does not specify that the warning statement must be marked on the front of the packaging.

9. Can prepackaged konjac jelly confectionery product with a small surface area be exempt from the requirement of labelling with the warning statement on prevention of choking hazard?

No. While Schedules 4 and 6 to the existing Food and Drugs (Composition and Labelling) Regulations (Cap. 132W) exempt prepackaged food with small surface area from certain requirements for food and nutrition labelling, there is no such exemption in respect of the requirement for prepackaged konjac-containing jelly confectionery products to be labelled with a warning statement on prevention of choking hazard under the Amended Regulations. Therefore, prepackaged konjac-containing jelly confectionery products must still adhere to the labelling requirement for choking warning.

