Proposed Amendments to the Sweeteners in Food Regulations (Cap. 132U)



1st Technical Meeting with Trade
25 November 2026

食物環境衞生署
Food and Environmental Hygiene Department

食物安全中心
Centre for Food Safety

Public Consultation

- **The 3-month public consultation will end on 4 December 2026**
- **Comments on the proposed amendments are welcome during the consultation period**

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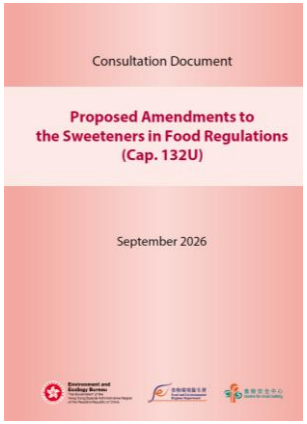

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Review on the Sweeteners in Food Regulations

Objectives

- Better protect public health
- Harmonise with international standards

Current Regulatory Control of Sweeteners in Hong Kong

- **Food additives**
  - Impart a sweet taste to food in place of sugars

- **Sweeteners in Food Regulations (Cap. 132U)**
  - Regulates through a "positive list" approach
    - A total of 10 permitted sweeteners listed in the Schedule
    - No person shall sell, consign, deliver or import any food containing other sweeteners

Proposed Amendments

- **Having regard to the international standards established by Codex (i.e. GSFA) and the Mainland standards, the dietary habits and intake of local population as well as the practices of other major food trading partners of Hong Kong, we consider there is a case for amending Cap. 132U**
- **Major areas of the proposed amendments：**
  - Bringing polyhydric alcohols under the regulatory scope
  - Expanding the list of permitted sweeteners
  - Specifying the maximum permitted levels for individual “sweetener-food” pairs

To Bring Polyhydric Alcohols under the Regulatory Scope (I)

- **Definition under the existing Cap. 132U**

> ***sweetener*** (甜味劑) means any chemical compound which is sweet to the taste, but does not include any sugars or other carbohydrates or polyhydric alcohols. *(L.N. 225 of 2003; L.N. 61 of 2010)*

- **Polyhydric alcohols (also known as sugar alcohols)**
  - ➢ Have been widely used
    - E.g. Xylitol and sorbitol are commonly used in chewing gums and sugar-reduced food
  - ➢ Some also occur naturally in food
- **GSFA, the Mainland and a number of food trading partners of Hong Kong have covered polyhydric alcohols in their standards**

To Bring Polyhydric Alcohols under the Regulatory Scope (II)

- **Proposal: To bring polyhydric alcohols under the regulatory scope**
  - **To amend the definition of "sweeteners" in Cap. 132U by removing the current exclusion of polyhydric alcohols**
  - **To refine the definition of sweetener**

Proposed definition: Any food additive that is capable of imparting a sweet taste to a food but does not include any sugars or other carbohydrates

To Expand the List of Permitted Sweeteners

	No. of permitted sweeteners
Existing Cap. 132U	10
Not covered under the regulatory scope of Cap. 132U	10
Newly adopted from Codex	1
Monk fruit extract	1
Total	**22**

Advantame

- A new generation of sweetener, with high sweetness intensity of ~20000 times sweeter than sucrose; adding trace amount can already provide sweetness
- Food with advantame can be sold in Hong Kong after the amendment; would offer the food trade an additional choice of permitted sweetener

10 polyhydric alcohols (sugar alcohols) with sweetener function

- Have been widely used in food and will bring under the proposed regulatory scope

- Long history of safe consumption by humans, recently assigned with an INS no. 970 as sweetener
- Its use in food as a sweetener is permitted in many places

Proposed Permitted Sweeteners

Currently permitted sweeteners	Proposed additional sweeteners	
1. Acesulfame potassium*	1. Erythritol	
2. Alitame*	2. Isomalt (Hydrogenated isomaltulose)	
3. Aspartame*	3. Lactitol	
4. Aspartame-acesulfame salt*	4. Maltitol	**Polyhydric alcohols**
5. Cyclamates	5. Maltitol syrup	**alcohols**
6. Neotame	6. Mannitol	(also
7. Saccharins	7. Polyglycitol syrup	known as
8. Steviol glycosides*	8. Sorbitol	sugar
9. Sucralose* (Trichlorogalactosucrose)	9. Sorbitol syrup	alcohols)
10. Thaumatin	10. Xylitol	
	11. Advantame (Newly adopted from Codex)	
	12. Monk fruit extract	

* The Chinese names of acesulfame potassium, alitame, aspartame, aspartame-acesulfame salt, steviol glycosides and sucralose will be amended as「乙酰磺胺酸鉀」,「阿力甜」,「阿斯巴甜」,「阿斯巴甜-乙酰磺胺酸鹽」,「甜菊糖苷」and「三氯蔗糖」respectively

To Specify the Maximum Permitted Levels for Individual "Sweetener-food" Pairs

- **Cap. 132U currently only specifies a list of permitted sweeteners**
- **Drawing reference from international practices, we propose to stipulate maximum permitted levels (MPLs) of permitted sweeteners for specified food under a food category system based on the GSFA**
  - MPLs for over 900 "sweetener-food" pairs (e.g. "neotame-frozen fruit" and "neotame-candied fruit") will be established
    - About 80% are based on Codex standards
    - The remainder of about 20% are based on the Mainland standards (e.g. Candied fruits)

Multi-functional Food Additives

- **Some permitted sweeteners are multi-functional food additives**

NEOTAME

INS 961 Neotame → Functional Class: Flavour enhancer, Sweetener

- **When applying these additives in food, no matter if they are used as sweetener or not, their levels shall not exceed the corresponding MPLs stipulated in the amended Cap. 132U**
  - In line with that of Codex as well as the practice of our major food trading partners

Sweeteners Permitted for Use in Foods in Accordance with "GMP Principles"

- **Propose permitting the use of 12 sweeteners in food accordance with "Good Manufacturing Practice" principles ("GMP principles")**
  - 10 polyhydric alcohols and thaumatin: GMP additives under the GSFA
  - Monk fruit extract: Can be used in accordance with GMP principles as sweetener among our major food trading partners including the Mainland, Australia, New Zealand, Singapore and the US
- **Making reference to GSFA and the Mainland standards, it is proposed to specify a list of "inapplicable food categories" in the amended Cap. 132U**
  - The use of GMP additives in such inapplicable food categories would be regulated through the MPLs (if available)

Other Technical Amendments – To Adopt "Carry-over principle" (I)

- **A food may contain all the sweeteners permitted for use in its ingredients on a pro rata basis as a result of carry-over**

Example：

- The MPLs for sucralose in flavoured yoghurt (food category 1.7) and breakfast cereals (food category 6.3) are 400 mg/kg and 1000 mg/kg respectively
- A cereal yoghurt may contain sucralose carry-over from its ingredients on a pro rata basis
- If flavoured yoghurt and breakfast cereal each account for half that product's total weight, the MPL for sucralose in that product would be calculated as: $400 \times 50\% + 1000 \times 50\% = 700 mg/kg$



Other Technical Amendments – To Adopt "Carry-over principle" (II)

- **Carry-over of any sweetener from an ingredient would not be permitted for foods belonging to the food category "Infant formulae, follow-up formulae, formulae for special medical purposes for infants and complementary foods for infants and young children"**
  - Mannitol that serves as a nutrient carrier in raw material or other ingredient carried over to this food category would be permitted

Example：

- Steviol glycosides is permitted in strawberry puree (food category 4.1.2.8), with an MPL at 330 mg/kg
- However, it is **not permitted** that a strawberry puree containing yoghurt for infants and young children to contain steviol glycosides as a result of carry-over from its ingredients



Other Amendments – To Adopt "Carry-over Principle" (III)

- **An ingredient that is used exclusively in the preparation of a relevant food may contain any sweeteners permitted in that food, and the prepared food shall comply with the amended Cap. 132U, including that the MPLs of the sweeteners specified in relation to its scheduled food category are not exceeded**

Example:

- Steviol glycosides is not permitted in food category "1.3.2 Beverage whiteners"
- Steviol glycosides is permitted in food category "14.1.5 Coffee, coffee substitutes, tea, herbal infusions, and other hot cereal and grain beverages" with an MPL at 200 mg/kg
- That type of whitener explicitly described for use solely in the preparation of coffee may contain steviol glycosides, provided that the level of steviol glycosides in the coffee prepared with that whitener would not exceed 200 mg/kg



Other Technical Amendments

- **To exempt any naturally present sweetener component**
  - If a sweetener (e.g. sorbitol) is a naturally present component in a food (e.g. fresh peach), such natural content will be exempted
  - Sweeteners that are intentionally added to that food are still subject to Cap. 132U
- **To update the Chinese names of certain currently permitted sweeteners to align with those in the GSFA and Mainland standards**

Flavourings* and Other Food Additives Used as Ingredients in the Preparation of Food

- **Taking into account international practice, we propose to allow flavourings used as ingredients in the preparation of food to contain permitted sweeteners (as is the case under the existing Cap. 132U)**
- **The types and amount of permitted sweeteners present in the prepared food containing flavourings shall comply with the amended Cap. 132U**
  - **The amount of permitted sweeteners shall not exceed the MPLs specified in relation to its food category**
- **The above principle also applies to other food additives used as ingredients in the preparation of food (e.g. a bulking agent may contain / mix with permitted sweetener in a food additive preparation)**

* Products that are added to food to impart, modify, or enhance the flavour of food (with the exception of flavour enhancers) and do not include substances that have an exclusively sweet, sour, or salty taste.

Reality Check

- **The CFS has collected food samples on the local market for testing of sweeteners**
  - About 98% of the analytical results can meet the proposed MPLs
  - Samples that were unable to meet the proposed MPLs primarily include Chinese-style preserved fruits (such as dried tangerine peel and plum candy), pickled vegetables, drinks, cakes, and cookies etc.
    - The sweeteners involved mainly include cyclamates, acesulfame potassium, steviol glycosides, and saccharins

Transitional Period

- **Propose to provide an 18-month transitional period following completion of the legislative procedure to facilitate preparation by the food trade and other stakeholders for compliance**
  - During the transitional period, full compliance with the requirements of either Cap. 132U before amendment or the amended Cap. 132U shall fulfil the statutory requirements
- **Will conduct technical meetings and issue user guidelines**
  - To facilitate the trade in understanding and complying with the new requirements

Way forward

- **Will consider the feedback received in detail, and prepare the subsidiary legislation to amend Cap. 132U for tabling at the Legislative Council for scrutiny**

Rare Sugars

- **According to the existing & proposed amendments to Cap. 132U**
  - ***Sweetener*** …….. "does not include any sugars or other carbohydrates"
    - ***Sugar*** means any soluble **carbohydrate** sweetening matter
    - ***Carbohydrate*** means a substance containing only carbon, hydrogen and oxygen, in which the **hydrogen and oxygen occur in the same proportion as they do in water**

Rare sugars do NOT fall under the regulatory scope of the existing & proposed amendments to Cap. 132U

Labelling of Food Additives in Prepackaged Foods

- **Schedule 3 to the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W)**
  - An additive constituting one of the ingredients of a food shall be listed by its functional class and—
    a. its specific name; or
    b. its identification number under the International Numbering System for Food Additives; or
    c. its identification number under the International Numbering System for Food Additives with the prefix "E" or "e"

Sweeteners Permitted for Use in Foods in Accordance with "GMP Principles"

- **Example :**
  - Thaumatin is one of the GMP additives

Can be used in accordance with GMP in food, except in those "inapplicable food categories"

  - Food category "14.1.3.1 Fruit nectar" is one of the "inapplicable food categories"
  - If thaumatin is used in fruit nectar, its level should not exceed the corresponding MPL i.e. 25 mg/kg

14.1.3.1	Fruit nectar 	950	Acesulfame potassium	350	Note 1
		969	Advantame	6	
		956	Alitame	100	
		951	Aspartame	600	Note 3
		962	Aspartame-acesulfame salt	350	Note 5
		952	Cyclamates	650	Note 6
		965(i)	Maltitol	GMP	
		965(ii)	Maltitol syrup	GMP	
		961	Neotame	65	
		954	Saccharins	80	Note 8
		420(i)	Sorbitol	GMP	
		420(ii)	Sorbitol syrup	GMP	
		960	Steviol glycosides	200	Note 9
		955	Sucralose (Trichlorogalactosucrose)	300	
		957	Thaumatin	25	

~Thank you~