

## **TECHNICAL GUIDANCE NOTE ON THE LABELLING SCHEME ON NUTRITION INFORMATION**

### **INTRODUCTION**

The Food and Drugs (Composition and Labelling) (Amendment) Regulation 200X (the Amendment Regulation) was enacted on \_\_\_\_\_, which signified a new era of food labelling in Hong Kong. The Amendment Regulation introduces a Labelling Scheme on Nutrition Information (“The Scheme”) which covers two main types of nutrition information on food labels, namely nutrition labelling and nutrient-related claims.

2. In order to assist the trade in compliance with the regulations, the Centre for Food Safety (CFS) has prepared this technical guidance note with a purpose to provide technical information on nutrition labelling and to answer some of the most frequently asked questions, which in turn offers guidance to the trade in formulating nutrition labels and making nutrient-related claims

### **DISCLAIMER**

3. This technical guidance note is intended for use as general reference for labelling purpose only. Information contained in this technical guidance note is not exhaustive. Specific issues should be considered on a case by case basis. For detailed legal provisions governing the labelling of prepackaged food, please refer to the Food and Drugs (Composition and Labelling) Regulations, Cap.132 W.

### **OBJECTIVE OF LEGISLATIVE AMENDMENT**

4. Nutrition is essential for growth, tissue repair and maintenance of good health. On the other hand, many chronic degenerative diseases such as coronary heart disease, diabetes and certain types of cancer are related to an imbalanced diet. These nutrition-related diseases are important public health problems in many parts of the world including Hong Kong.

5. Providing nutrition information on food labels is an important public health tool to promote a balanced diet as food label is an important communication channel whereby consumers can obtain specific information on individual food products.

6. The introduction of the Scheme aims to (i) facilitate consumers to make healthy food choices; (ii) encourage food manufacturers to apply sound nutrition principles in the formulation of foods which would benefit public health; and (iii) regulate misleading or deceptive labels and claims.

## **NUTRITION LABELLING**

### **Coverage and Implementation Time Frame**

7. The amendment regulation makes reference to the Codex Guidelines on Nutrition Labelling and is focused on general prepackaged foods (prepackaged food). The regulation is not applicable to infant/follow-up formulae, foods for infants and young children, and other foods for special dietary uses due to the special nutritional requirements of these target subgroups.

8. With a few exemptions, the amendment regulation requires the presence of nutrition label compulsory on all prepackaged foods. Nutrition label with energy and seven core nutrients (namely protein, carbohydrate, fat, saturated fat, trans fat, sodium and sugars) will become mandatory for prepackaged foods beginning \_\_\_\_\_, after a two-year grace period followed by the enactment of the amendment regulation on \_\_\_\_\_.

### **Exemption**

9. The following items are exempt from nutrition labelling:

i. [To be inserted later]

10. Exempt items lose their exemption status when the food label [or advertisement] contains any nutrient-related claims. Except for low volume

products, exemption status of all other exempt items will also be removed if nutrition labels or any nutrition information are found on the packages.

### Information in the Nutrition Label

11. Nutrition label must include the information on energy, protein, carbohydrate, fat, saturated fat, trans fat, sodium and sugars. Furthermore, the nutrition label must list the amounts of any claimed nutrients or nutrients required to be declared along with any nutrient-related claims. Additional information on other nutrients may voluntarily be included in the nutrition label.

12. There are two options given for labelling carbohydrate content on the nutrition label – (i) to define and label carbohydrate as “available carbohydrate<sup>1</sup>”; and (ii) to define and label carbohydrate as “total carbohydrate”. If the latter option is applied, the amount of dietary fibre must be provided below the amount of total carbohydrate. In case the term “carbohydrate” is used on nutrition labels, it will be assumed that the amount is calculated/defined as available carbohydrate.

13. Names that are commonly known to consumers are considered acceptable in nutrition labelling. Furthermore, the term “vitamin” can be abbreviated to “vit”. The following table listed some of the common names of nutrients:

<b>Information</b>	<b>Common Names</b>
<b>Energy</b>	“Energy” / “Calories” / “Kilojoules” <i>(When “Calories” or “Kilojoules” is used, the term must match with the corresponding unit of energy.)</i>
<b>Total fat</b>	“Fat” / “Total fat” / “Fat, Total”
<b>Available carbohydrate</b>	“Available Carbohydrate” / “Carbohydrate, Available” / “Carbohydrate”
<b>Total carbohydrate</b>	“Total Carbohydrate” / “Carbohydrate, Total”
<b>Saturated fatty acids</b>	“Saturated Fat” / “Saturated Fatty Acids” / “Saturated” / “Saturates”
<b>Trans fatty acids</b>	“Trans Fat” / “Trans”
<b>Polyunsaturated fatty acids</b>	“Polyunsaturated Fat” / “Polyunsaturated Fatty

<sup>1</sup> Available carbohydrate is defined as the amount of total carbohydrate minus the amount of total dietary fibre.

	Acids” / “Polyunsaturated” / “Polyunsaturates”
<b>Monounsaturated fatty acids</b>	“Monounsaturated Fat” / “Monounsaturated Fatty Acids” / “Monounsaturated” / “Monounsaturates”
<b>Dietary fibre</b>	“Dietary fiber” / “Fibre” / “Fiber”
<b>Iodine</b>	“Iodide”
<b>Vitamin B1</b>	“Thiamine” / “Thiamin”
<b>Vitamin B2</b>	“Riboflavin”
<b>Vitamin B3</b>	“Niacin”
<b>Vitamin B12</b>	“Cobalamin”
<b>Folic acid</b>	“Folate” / “Folacin”
<b>Pantothenic acid</b>	“Pantothenate”
<b>Vitamin C</b>	“Ascorbic acid”

### Nutrient Content Expression

#### (I) Mandatorily Required Nutrients (including core nutrients and claimed nutrients)

##### Absolute Amount Expression

14. Energy value must be expressed as:
- i. kilocalorie (kcal) or kilojoule (kJ) per 100 g /ml; or
  - ii. kilocalorie (kcal) or kilojoule (kJ) per package if the package contains only a single serving; or
  - iii. kilocalorie (kcal) or kilojoule (kJ) per serving<sup>2</sup>, given that the number of servings and the serving size (in metric units, e.g., grams, millilitres) are provided in the nutrition label.
15. Nutrients must be expressed as:
- i. Metric unit (e.g., grams, milligrams) per 100 g /ml; or
  - ii. Metric unit (e.g., grams, milligrams) per package if the package contains only a single serving; or
  - iii. Metric unit (e.g., grams, milligrams) per serving, given that the number of servings and the serving size (in metric units, e.g., grams, millilitres) are provided in the nutrition label.

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<sup>2</sup> Reasonable serving size should be used. The trade may refer to overseas nutrition labelling regulations for reference.

**Relative Amount Expression**

16. In addition to absolute amount expression, the trade may further provide the information in relative amount expression, i.e., in a percentage of reference value derived for nutrition labelling. In order to provide the relative amount expression on the nutrition labels, the following criteria must be met –

- i. The Nutrient Reference Values (NRVs) applied should be based on local NRVs (i.e., Chinese NRVs). Alternatively, figures from recognized international authority (e.g., Codex) or overseas food authorities (e.g., USFDA, CFIA or FSANZ) could be used.

**Chinese Nutrient Reference Values (Chinese NRVs)**

[Applicable to Hong Kong and the Mainland China]

<u>Macronutrients</u>		<u>Vitamins</u>	
Energy (kcal/kJ)	2000/8400	Vitamin A (µg RE)	800
Protein (g)	60	Vitamin D (µg)	5
Total fat (g)	60	Vitamin E (mg α-TE)	14
Saturated fat (g)	20	Vitamin K (µg)	80
Cholesterol (mg)	300	Vitamin B1 (mg)	1.4
Carbohydrate, Total (g)	300	Vitamin B2 (mg)	1.4
Dietary Fiber (g)	25	Vitamin B6 (mg)	1.4
		Vitamin B12 (µg)	2.4
		Niacin (mg)	14
<u>Minerals</u>		Folic Acid (µg DFE)	400
Calcium (mg)	800	Pantothenic Acid (mg)	5
Phosphorus (mg)	700	Biotin (µg)	30
Potassium (mg)	2000	Vitamin C (mg)	100
Sodium (mg)	2000	Choline (mg)	450
Iron (mg)	15		
Zinc (mg)	15		
Copper (mg)	1.5		
Iodine (µg)	150		
Selenium (µg)	50		

Magnesium (mg)	300
Manganese (mg)	3
Chromium (µg)	50
Molybdenum (µg)	40
Fluoride (mg)	1

- ii. The corresponding absolute amount expression must be appeared in the nutrition label.
- iii. Relevant heading must be provided, e.g., %NRV (% Nutrient Reference Value), %DV (% Daily Value), %DI (%Daily Intake).

17. Special attention should be paid when providing %NRV information for carbohydrate. Since the Chinese NRV for carbohydrate is based on *total* carbohydrate, when listing the %NRV of available carbohydrate, it should be calculated as –

$$\begin{array}{l} \%NRV \text{ available} \\ \text{carbohydrate} \end{array} = \frac{\text{Amount of available carbohydrate}}{\text{Total carbohydrate NRV} - \text{Dietary fibre NRV}}$$

### Nutrient Content Expression

#### (II) Voluntary Nutrients

18. Either the absolute amount expression or the relative amount expression would be acceptable for declaring the contents of voluntary nutrients on nutrition labels. For absolute amount expression, requirements under para 15 should be followed. As for relative amount expression, requirements under para 16 and para 17 should be applied.

19. Regardless of nutrients for mandatorily or voluntarily listing, all nutrient content expressions must be accurate and truthful.

### Units and Rounding Rules

20. To present energy and nutrient values on nutrition labels, it is suggested that the following units and rounding rules be applied when absolute amount expression is used –

	<b>Unit</b>	<b>Round to</b>	<b>Definition of “0”<sup>3</sup> (per 100 g/ml)</b>
Energy	Kcal or kJ	1	≤ 4 kcal or 17 kJ
Protein	g	0.1	≤ 0.5 g
Total fat	g	0.1	≤ 0.5 g
Saturated fat	g	0.1	≤ 0.5 g
Trans fat	g	0.1	≤ 0.3 g
Cholesterol	mg	1	≤ 5 mg
Carbohydrate (Available or Total)	g	0.1	≤ 0.5 g
Dietary Fiber	g	0.1	≤ 1.0 g
Sodium	mg	1	≤ 5 mg
Sugars	G	0.1	≤ 0.5 g

21. Regarding the relative amount expression, the information should be round to nearest 1% (e.g., 4.3% to be round to 4% and 7.8% to be round to 8%).

### Nutrition Labelling Format

22. The nutrition information must be presented in tabular format and the nutrition label must be placed on a conspicuous place on the prepackaged food. Other than the tabular format, the trade has an option to use linear format for small packages with less than 200 cm<sup>2</sup> total surface area.

23. Regardless of the size and/or format of the nutrition label, it is recommended that a heading, such as “Nutrition Label”, “Nutrition Information” or “Nutrition Fact” shall be displayed. Furthermore, it is

<sup>3</sup> Same conditions should be applied to the definition of 0% NRV on nutrition labels.

suggested that the terms “per 100g”, “per 100ml”, “per package” or “per serving” shall be placed at the appropriate position in the nutrition label (Annex I).

24. There are no requirements on the order of nutrients, except for presenting various types of fats and cholesterol and presenting various types of carbohydrates. When declaring the amount and/or types of fat or the amount of cholesterol and various types of fat, it is suggested that the following order be used –

Fat, Total

- Saturated fat
- Trans fat
- Monounsaturated fat
- Polyunsaturated fat

Cholesterol

25. Similarly, when declaring the amount and/or types of carbohydrates, various types of carbohydrates, it is suggested that the following order be used –

Carbohydrates

- Dietary fibre
- Sugars

26. The nutrition label can be in either English or Chinese (simplified and traditional) unless when the name of the food and the list of ingredients are in English and Chinese, then the nutrition label must be in both English and Chinese (simplified or traditional).

Compliance and Tolerance Limits

27. Under the routine surveillance programme, the Administration verifies the accuracy of nutrient values on nutrition labels. Depending on the type of nutrients, the declared label values have different tolerance limits –

<b>Nutrients</b>	<b>Tolerance Limits</b>
Energy, Fat, Saturated fat, Trans fat, Cholesterol,	≤ 120% declared value

Sodium, Sugar	
Protein, Polyunsaturated fat, Monounsaturated fat, Carbohydrate, Starch, Dietary fibre, Soluble fibre, Insoluble fibre, individual component of fibre	≥ 80% declared value
Vitamins and minerals, other than vitamin A, vitamin D and added vitamins and minerals	≥ 80% declared value
Vitamin A, Vitamin D	80% - 180% declared value
Added vitamins and minerals (other than vitamin A and Vitamin D)	≥ declared value

## NUTRIENT-RELATED CLAIMS

### Nutrient Content Claims

28. Nutrient content claim which describes the energy value or the amount of nutrients contained in a food item must fulfil meet the following criteria –

- i. To meet the conditions for nutrient content claims as listed in Annex II; and
- ii. To declare the content of the claimed nutrient in the nutrition label. If any type of fat or cholesterol is involved, the following items must be declared in the nutrition label as well -
  - i. Polyunsaturated fat;
  - ii. Monounsaturated fat; and
  - iii. Cholesterol

29. A list of synonyms, i.e., descriptive words with similar meaning, is provided below to facilitate the trade in making nutrient content claims –

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[All contents are subject to change]

Claim	Synonyms		Signs / Symbols
	English	Chinese	
Low (低)	<ul style="list-style-type: none"> <li>• Little</li> <li>• Low source</li> <li>• Few</li> <li>• Contains a small amount of</li> <li>• Contains less than X g of</li> </ul>	<ul style="list-style-type: none"> <li>• 少</li> <li>• 提供很少</li> <li>• 含量低</li> <li>• 含量少於 X g</li> <li>• 略含</li> <li>• 薄</li> </ul>	
Very low* (很低)	<ul style="list-style-type: none"> <li>• Extremely low</li> </ul>	<ul style="list-style-type: none"> <li>• 非常低</li> <li>• 極低</li> <li>• 激低</li> </ul>	
Free (不含)	<ul style="list-style-type: none"> <li>• Zero</li> <li>• No</li> <li>• Contains no</li> <li>• Without</li> <li>• Off</li> </ul>	<ul style="list-style-type: none"> <li>• 無</li> <li>• 零</li> <li>• 沒有</li> </ul>	• ✘
Source (來源)	<ul style="list-style-type: none"> <li>• Contains</li> <li>• Provides</li> <li>• Has</li> <li>• With</li> </ul>	<ul style="list-style-type: none"> <li>• 含</li> <li>• 有</li> <li>• 含有</li> </ul>	• ✓
High (高)	<ul style="list-style-type: none"> <li>• High source</li> <li>• Good source of</li> <li>• Excellent source of</li> <li>• A valuable source of</li> <li>• Rich in</li> <li>• Plenty of</li> </ul>	<ul style="list-style-type: none"> <li>• 豐富</li> <li>• 富含</li> <li>• 含豐富</li> <li>• 多</li> <li>• 提供很多</li> <li>• 含量多</li> </ul>	

\* It should be noted that synonyms for “very low” claims should not be used for claims meeting the condition for “low”.

30. The term “skim/skimmed” and “semi-skim/semi-skimmed” should not be used as synonyms for any claims, as there are legal definitions of skimmed milk and semi-skimmed milk under the current food regulations (Cap 132, Section 55, Schedule I, Part II).

### Nutrient Comparative Claims

31. Nutrient comparative claim which compares the energy value or the amount of nutrients contained in same or similar types of food must fulfil the following criteria –

- i. The comparison must be based on the same quantity;
- ii. The amount of difference must be in close proximity to the nutrient comparative claims;
- iii. The description of the food being compared must be given; and
- iv. The comparison must meet the conditions below -

<b>Nutrients</b>	<b>Conditions</b>
Energy, Fat	<ol style="list-style-type: none"><li>i. The relative difference shall not be less than 25%; and</li><li>ii. The absolute difference shall not be less than the amount of “low” as nutrient content claim.</li></ol>
Saturated fat, Cholesterol	<ol style="list-style-type: none"><li>i. The relative difference shall not be less than 25%; and</li><li>ii. The absolute difference shall not be less than the amount of “low” as nutrient content claim.</li><li>iii. The sum of saturated fat and trans fat in the prepackaged food with the nutrient comparative claim must not be more than 10% of energy.</li></ol>
Sugars	<ol style="list-style-type: none"><li>i. The relative difference shall not be less than 25%; and</li><li>ii. The absolute difference shall not be less than the amount of “low” as nutrient content claim.</li></ol>
Protein	<ol style="list-style-type: none"><li>i. The relative difference shall not be less than 25%; and</li></ol>

	ii. The absolute difference shall not be less than the amount of “source” or “low” as nutrient content claim.
Dietary fibre	i. The relative difference shall not be less than 25%; and ii. The absolute difference shall not be less than the amount of “source” as nutrient content claim.
Sodium	i. The difference shall not be less than 10% of Chinese NRV; and ii. The difference shall not be less than the amount of “low” as nutrient content claim.
Vitamins Minerals	iii. The difference shall not be less than 10% of Chinese NRV; and iv. The difference shall not be less than the amount of “source” as nutrient content claim.

- v. The claimed nutrient must be declared in the nutrition label. Furthermore, if any type of fat or cholesterol is involved, the following items must be declared in the nutrition label as well -
- i. Polyunsaturated fat;
  - ii. Monounsaturated fat; and
  - iii. Cholesterol

32. A list of synonyms, i.e., descriptive words with similar meaning, is provided below to facilitate the trade in making nutrient comparative claims –

Claim	Synonyms		Signs / Symbols
	English	Chinese	
Less (較低)	<ul style="list-style-type: none"> <li>• Light / Lite</li> <li>• Lower</li> <li>• Lower source</li> <li>• Fewer</li> <li>• Reduced</li> <li>• Contains less</li> </ul>	<ul style="list-style-type: none"> <li>• 較/更/超低</li> <li>• 較/更/超少</li> <li>• 提供較/更/超少</li> <li>• 含量較/更/超低</li> </ul>	<ul style="list-style-type: none"> <li>• ↓</li> <li>• -</li> </ul>

	• X times less	• 減低	
Higher (較高)	<ul style="list-style-type: none"> <li>• Extra</li> <li>• More</li> <li>• Additional</li> <li>• Added</li> <li>• Plus</li> <li>• Enriched</li> <li>• Fortified</li> <li>• Strengthened</li> <li>• X times more</li> </ul>	<ul style="list-style-type: none"> <li>• 較/更/超高</li> <li>• 較/更/超多</li> <li>• 增加</li> <li>• 添加</li> <li>• 增添</li> <li>• 加強</li> <li>• 強化</li> </ul>	<ul style="list-style-type: none"> <li>• ↑</li> <li>• +</li> </ul>

### Nutrient Function Claims

33. Nutrient function claim which describes the physiological role of a nutrient in growth, development and normal function of body must fulfil the following criteria –

- i. The nutrient function claim is made on a nutrient with a Chinese NRV;
- ii. The nutrient function claim is based on scientific substantiation and scientific consensus;
- iii. The nutrient function claim must contain information on the physiological role of the claimed nutrient;
- iv. The content of the claimed nutrients must meet the minimum requirement of corresponding nutrient content claims, if applicable; and
- v. The claimed nutrient must be declared in the nutrition label. Furthermore, if any type of fat or cholesterol is involved, the following items must be declared in the nutrition label as well -
  - i. Polyunsaturated fat;
  - ii. Monounsaturated fat; and
  - iii. Cholesterol

## **INDIRECT NUTRIENT ANALYSIS**

34. The nutrition information of foods can be obtained by either direct chemical analysis of food samples or indirect nutrient analysis based on calculation. Indirect nutrient analysis is accepted as one of the means to obtain information for labelling.

35. The trade are responsible for nutrition labelling values on their products. If they choose to use ingredient databases, they should be assured of the accuracy of the databases and validate the resulting calculations by comparing them with values for the same foods obtained from laboratory analyses. The trade must ensure the accuracy of the nutrition labelling values on their products. They should use appropriate method in calculating the nutrition labelling values and should be aware of the limitation of indirect nutrient analysis.

36. Before using the method of indirect nutrient analysis for obtaining nutrition labelling values, the trade must have a clear idea about the types and contents of ingredients, manufacturing process, retention factors and ensure that the data in these food composition databases is derived from appropriate testing methods.

### *Method of indirect nutrient analysis*

37. In the indirect nutrient analysis, the nutrient value of each ingredient was calculated by the weight of ingredient and respective nutrient data from food composition database. Appropriate adjusting factors for adjusting the nutrient gain or loss during processing may be required. The steps are as follows:

- Step 1. Collect the product recipe and information on manufacturing processes involved.
- Step 2. Find out the weight of individual ingredients from the recipe and collect nutrient content for each ingredient from reputable nutrient database as appropriate.
- Step 3. Correct the weight of ingredients to reflect the actual weight of edible portions where appropriate.
- Step 4. Adjust for the effects of cooking/processing:
  - (a) If nutrient data available are for cooked/processed ingredients,

use yield factors to adjust raw weights of ingredients to cooked weights.

- (b) If nutrient data available are for uncooked ingredients, apply retention factors for nutrient losses or gains during cooking; apply yield factors to adjust for weight changes of ingredients after cooking to account for the weight of the final product as appropriate.

Step 5. Sum nutrient values of ingredients to obtain nutrient value of the recipe.

Step 6. Determine the quantity of prepared food produced by the recipe.

Step 7. Determine the final values per weight (e.g., per 100 g), per volume (e.g., per 100 ml), or per serving portion as appropriate.

38. To increase the accuracy of the indirect nutrient analysis, the trade should:

- Consider adopting GMP to minimize the deviations among the same product.
- Check the accuracy of the type and amount of ingredients listed in the standardized recipes for the products.
- Ensure the nutrient values in the food composition database are representative of their particular products.
- Guarantee that the calculations are performed by personnel with professional competence and are based on the best available data and adjusting factors.

39. A Nutrition Label Calculator is developed to assist the trade in producing nutrition labels by means of indirect analysis. The trade can enter the nutrient value of product ingredients into the calculator, calculate average nutrient quantities of the product, and prepare the nutrition information labels in a straightforward manner. The Nutrition Label Calculator is available from the website of the Centre for Food Safety- [URL of the webpage to be inserted later]

40. If there is any uncertainty in the course of indirect nutrient analysis, it is strongly recommended to obtain the nutrient profile of the finished food product by laboratory analysis.

### *Limitation*

41. The nutrient values of all food composition databases are mostly estimates that attempt to provide representative data. Foods are likely to vary greatly in their natural nutrient composition because of variations in seasons, processing practices and ingredient sources. Difference between data from food composition database and laboratory analysis results of specific food samples may thus be observed.

42. Food processing and cooking may lead to gain or loss in weight and nutrients in the products. For example:

- Values of fat and saturated fat may be severely affected by the amount and type of fat absorbed during high-fat processing.
- Carbohydrate content of cereal foods may be affected by soaking before cooking or rinsing after cooking.
- Sugar and sodium in foods may be lost in some processes.
- Water-soluble vitamins and minerals may be lost when the food is soaked in water.

43. The trade should always ensure these factors have been taken into account in the course of indirect nutrient analysis as appropriate, and consider carefully whether the calculations would obtain accurate nutrient values for nutrition labelling.

44. Different food composition databases may have their own definition of nutrients and use different analytical methods for estimating nutrient values in foods. Discrepancy in food nutrient values may therefore be observed between individual databases. The trade should ensure the database they choose to utilize has adopted suitable analytical methods, and the nutrient values derived from the database data are suitable to be used on nutrition labelling. Caution should especially be made on nutrients which contents are highly depending on the definition of nutrient and the method of analysis adopted, such as dietary fibre. More information on analytical methods for nutrients could be found in “Technical Guidance Notes on Testing Methods for Nutrition Information”.

45. It should be aware that given these limitations, the results of indirect nutrient analysis would be approximate in nature rather than reflective of the actual nutrient composition of a certain food item. The trade should note the possible deviation of results of indirect nutrient analysis from laboratory analysis, and be aware that the compliance test of nutrition labelling is based on the laboratory analysis using specified methods.

46. When the trade decides to use the method of indirect nutrient analysis for obtaining nutrient values for nutrition labelling, they should satisfy themselves that the values are representative of their particular product. In any case, the trade is responsible for ensuring the accuracy of the nutrition labelling values.

47. It should be noted that the compliance to the regulation on nutrition labelling would be assessed by laboratory analysis. It is the responsibility of the trade to assure the nutrient value obtained from indirect analysis is comparable to that from laboratory analysis. For information on the analytical methods for nutrients, the trade should refer to the “Technical Guidance Notes on Testing Methods for Nutrition Information”.

#### **FREQUENTLY ASKED QUESTIONS** (to be provided later)

**Centre for Food Safety**  
**Food and Environmental Hygiene Department**  
**8 January 2008**

**Annex I**

Examples of recommended formats of nutrition labelling -

A) Labels showing absolute amount per 100 g or 100 ml

<b>營養資料</b>		<b>Nutrition Information</b>	
	每 100 克 或每 100 毫升		Per 100g or Per 100ml
熱量	千卡 / 千焦	Energy	kcal / kJ
蛋白質	克	Protein	g
脂肪總量	克	Fat, total	g
- 飽和脂肪	克	- Saturated fat	g
- 反式脂肪	克	- Trans fat	g
碳水化合物	克	Carbohydrate	g
- 糖	克	- Sugars	g
鈉	毫克	Sodium	mg
填入涉及聲稱的營養素	克、毫克或微克	Insert nutrient(s) involved in claim(s)	g, mg or µg
填入其他標示的營養素	克、毫克或微克	Insert other nutrient(s) to be declared	g, mg or µg

<b>Nutrition Information</b>	<b>營養資料</b>
	Per 100g or Per 100ml/ 每 100 克或每 100 毫升
Energy / 熱量	kcal or kJ / 千卡或千焦
Protein / 蛋白質	g / 克
Fat, total / 脂肪總量	g / 克
- Saturated fat / 飽和脂肪	g / 克
- Trans fat / 反式脂肪	g / 克
Carbohydrate / 碳水化合物	g / 克
- Sugars / 糖	g / 克
Sodium / 鈉	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
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

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[All contents are subject to change]

B) Labels showing absolute amount per 100 g or 100 ml and absolute amount per serving

<b>營養資料</b>		
每包裝所含食用分量數目：(填入食用分量數目)		
食用分量： 克、毫升或其他適當的單位		
	每 100 克 或每 100 毫升	每食用分量
熱量	千卡 / 千焦	千卡 / 千焦
蛋白質	克	克
脂肪總量	克	克
- 飽和脂肪	克	克
- 反式脂肪	克	克
碳水化合物	克	克
- 糖	克	克
鈉	毫克	毫克
填入涉及聲稱的營養素	克、毫克或微克	克、毫克或微克
填入其他標示的營養素	克、毫克或微克	克、毫克或微克

<b>Nutrition Information</b>		
Servings Per Package: (Insert number of servings)		
Serving Size: g, ml or other unit as appropriate		
	Per 100g or Per 100ml	Per Serving
Energy	kcal / kJ	kcal / kJ
Protein	g	g
Fat, total	g	g
- Saturated fat	g	g
- Trans fat	g	g
Carbohydrate	g	g
- Sugars	g	g
Sodium	mg	mg
Insert nutrient(s) involved in claim(s)	g, mg or µg	g, mg or µg
Insert other nutrient(s) to be declared	g, mg or µg	g, mg or µg

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[All contents are subject to change]

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
Energy / 熱量	kcal or kJ / 千卡或千焦	kcal or kJ / 千卡或千焦
Protein / 蛋白質	g / 克	g / 克
Fat, total / 脂肪總量	g / 克	g / 克
- Saturated fat / 飽和脂肪	g / 克	g / 克
- Trans fat / 反式脂肪	g / 克	g / 克
Carbohydrate / 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

C) Labels showing absolute amount per serving

營養資料	
每包裝所含食用分量數目: (填入食用分量數目)	
食用分量: 克、毫升或其他適當的單位	
	每食用分量
熱量	千卡 / 千焦
蛋白質	克
脂肪總量	克
- 飽和脂肪	克
- 反式脂肪	克
碳水化合物	克
- 糖	克
鈉	毫克
填入涉及聲稱的營養素	克、毫克或微克
填入其他標示的營養素	克、毫克或微克

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 [All contents are subject to change]

<b>Nutrition Information</b>	
<b>Servings Per Package:</b> (insert number of servings)	
<b>Serving Size:</b> g, ml or other unit as appropriate	
	<b>Per Serving</b>
<b>Energy</b>	<b>kcal / kJ</b>
<b>Protein</b>	<b>g</b>
<b>Fat, total</b>	<b>g</b>
- Saturated fat	<b>g</b>
- Trans fat	<b>g</b>
<b>Carbohydrate</b>	<b>g</b>
- Sugars	<b>g</b>
<b>Sodium</b>	<b>mg</b>
<b>Insert nutrient(s)</b> involved in claim(s)	<b>g, mg or µg</b>
<b>Insert other nutrient(s)</b> to be declared	<b>g, mg or µg</b>

<b>Nutrition Information      營養資料</b>	
<b>Servings Per Package / 每包裝所含食用分量數目:</b> (insert number of servings)	
<b>Serving Size / 食用分量:</b> g, ml or other unit as appropriate/克、毫升或其他適當的單位	
	<b>Per Serving / 每食用分量</b>
<b>Energy / 熱量</b>	<b>kcal or kJ/千卡或千焦</b>
<b>Protein / 蛋白質</b>	<b>g / 克</b>
<b>Fat, total / 脂肪總量</b>	<b>g / 克</b>
- Saturated fat / 飽和脂肪	<b>g / 克</b>
- Trans fat / 反式脂肪	<b>g / 克</b>
<b>Carbohydrate / 碳水化合物</b>	<b>g / 克</b>
- Sugars / 糖	<b>g / 克</b>
<b>Sodium / 鈉</b>	<b>mg / 毫克</b>
<b>Insert nutrient(s) involved in claim(s) / 填入涉及聲稱的營養素</b>	<b>g, mg or µg 克、毫克或微克</b>
<b>Insert other nutrient(s) to be declared / 填入其他標示的營養素</b>	<b>g, mg or µg 克、毫克或微克</b>

D) Labels showing absolute amount per 100g or 100 ml, absolute amount per serving and % NRV per 100g or 100 ml

<b>營養資料</b>			
每包裝所含食用分量數目：(填入食用分量數目)			
食用分量： 克、毫升或其他適當的單位			
	每 100 克 或每 100 毫升	每食用分量	每 100 克或 每 100 毫升的 營養素參考值 百分比*
熱量	千卡 / 千焦	千卡 / 千焦	%
蛋白質	克	克	%
脂肪總量	克	克	%
- 飽和脂肪	克	克	%
- 反式脂肪	克	克	%
碳水化合物	克	克	%
- 糖	克	克	%
鈉	毫克	毫克	%
填入涉及聲稱的營養素	克、毫克或微克	克、毫克或微克	%
填入其他標示的營養素	克、毫克或微克	克、毫克或微克	%

\* 按中國營養素參考值計算

<b>Nutrition Information</b>			
Servings Per Package: (insert number of servings)			
Serving Size: g, ml or other unit as appropriate			
	Per 100g or Per 100ml	Per Serving	% NRV * Per 100g or Per 100 ml
Energy	kcal / kJ	kcal / kJ	%
Protein	g	g	%
Fat, total	g	g	%
- Saturated fat	g	g	%
- Trans fat	g	g	%
Carbohydrate	g	g	%
- Sugars	g	g	%
Sodium	mg	mg	%
Insert nutrient(s) involved in claim(s)	g, mg or µg	g, mg or µg	%
Insert other nutrient(s) to be declared	g, mg or µg	g, mg or µg	%

\* Based on Chinese NRV

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 [All contents are subject to change]

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

E) Labelling carbohydrate as “total carbohydrate” (e.g., showing absolute amount per 100g or 100 ml, absolute amount per serving and % NRV per 100g or 100ml)

<b>營養資料</b>			
每包裝所含食用分量數目：(填入食用分量數目)			
食用分量： 克、毫升或其他適當的單位			
	每 100 克 或每 100 毫升	每食用分量	每 100 克或 每 100 毫升的 營養素參考值 百分比*
熱量	千卡 / 千焦	千卡 / 千焦	%
蛋白質	克	克	%
脂肪總量	克	克	%
- 飽和脂肪	克	克	%
- 反式脂肪	克	克	
總碳水化合物	克	克	%
- 糖	克	克	
- 膳食纖維	克	克	%
鈉	毫克	毫克	%
填入涉及聲稱的營養素	克、毫克或微克	克、毫克或微克	%
填入其他標示的營養素	克、毫克或微克	克、毫克或微克	%

\* 按中國營養素參考值計算

- DRAFT -  
 [All contents are subject to change]

<b>Nutrition Information</b>			
<b>Servings Per Package: (insert number of servings)</b>			
<b>Serving Size: g, ml or other unit as appropriate</b>			
	<b>Per 100g or Per 100ml</b>	<b>Per Serving</b>	<b>% NRV * Per 100g or Per 100 ml</b>
<b>Energy</b>	<b>kcal / kJ</b>	<b>kcal / kJ</b>	<b>%</b>
<b>Protein</b>	<b>g</b>	<b>g</b>	<b>%</b>
<b>Fat, total</b>	<b>g</b>	<b>g</b>	<b>%</b>
- Saturated fat	<b>g</b>	<b>g</b>	<b>%</b>
- Trans fat	<b>g</b>	<b>g</b>	
<b>Total Carbohydrate</b>	<b>g</b>	<b>g</b>	<b>%</b>
- Sugars	<b>g</b>	<b>g</b>	
- Dietary fibre	<b>g</b>	<b>g</b>	<b>%</b>
<b>Sodium</b>	<b>mg</b>	<b>mg</b>	<b>%</b>
<b>Insert nutrient(s) involved in claim(s)</b>	<b>g, mg or µg</b>	<b>g, mg or µg</b>	<b>%</b>
<b>Insert other nutrient(s) to be declared</b>	<b>g, mg or µg</b>	<b>g, mg or µg</b>	<b>%</b>

\* Based on Chinese NRV

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	% NRV * Per 100g or Per 100ml/ 每 100 克或 每 100 毫升的 營養素參考值 百分比*
Energy / 熱量	kcal or kJ / 千卡或千焦	kcal or kJ/ 千卡或千焦	%
Protein / 蛋白質	g / 克	g / 克	%
Fat, total / 脂肪總量	g / 克	g / 克	%
- Saturated fat / 飽和脂肪	g / 克	g / 克	%
- Trans fat / 反式脂肪	g / 克	g / 克	%
Total Carbohydrate / 總碳水化合物	g / 克	g / 克	%
- Sugars / 糖	g / 克	g / 克	%
- Dietary fibre / 膳食纖維	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	%

\* Based on Chinese NRV 按中國營養素參考值計算

F) Linear format (e.g., showing absolute amount per 100 g or 100 ml)

**營養資料** 每 100 克或每 100 毫升

熱量 xx 千卡/千焦，蛋白質 xx 克，脂肪總量 xx 克，飽和脂肪 xx 克，

反式脂肪 xx 克，碳水化合物 xx 克，糖 xx 克，鈉 xx 毫克，

填入涉及聲稱的營養素 xx 克、毫克或微克，填入其他標示的營養素 xx 克、毫克或微克

**Nutrition Information** Per 100g or Per 100ml

Energy xx kcal / kJ, Protein xx g, Fat, total xx g, Saturated fat xx g,  
Trans fat xx g, Carbohydrate 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

**Nutrition Information 營養資料** Per 100g or Per 100ml/每 100 克或每 100 毫升

Energy/熱量 xx kcal / kJ /千卡/千焦, Protein/蛋白質 xx g/克,  
Fat, total/脂肪總量 xx g/克, Saturated fat/飽和脂肪 xx g/克,  
Trans fat/反式脂肪 xx g/克, Carbohydrate/碳水化合物 xx g/克,  
Sugars/糖 xx g/克, Sodium/鈉 xx mg/毫克,  
Insert nutrient(s) involved in claim(s)/填入涉及聲稱的營養素 xx 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 xx g, mg or µg/  
克、毫克或微克

### CONDITIONS FOR NUTRIENT CONTENT CLAIMS

Component	Description of the claim	Conditions
<b>Energy</b>	(1) with the word “Low”	(a) Solid food containing not more than 40 kcal of energy per 100 g of food; or (b) liquid food containing not more than 20 kcal of energy per 100 mL of food.
	(2) with the word “Free”	Liquid food containing not more than 4 kcal of energy per 100 mL of food.
<b>Fat</b>	(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.
<b>Saturated Fat</b>	(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 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 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.
<b>Cholesterol</b>	(1) with the word “Low”	(a) Solid food containing – (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 not more than 10% of energy

Component	Description of the claim	Conditions
<b>Cholesterol</b>		<p><i>b)</i> Liquid food containing –</p> <p>(i) not more than 0.01 g of cholesterol per 100 mL of food;</p> <p>(ii) not more than 0.75 g saturated fat and trans fatty acids combined per 100 mL of food; and</p> <p>(iii) saturated fat and trans fatty acids, the sum of which not more than 10% of energy.</p>
	(2) with the word “Free”	<p><i>(a)</i> Solid food containing –</p> <p>(i) not more than 0.005 g of cholesterol per 100 g of food;</p> <p>(ii) not more than 1.5 g of saturated fat and trans fatty acids combined per 100 g of food; and</p> <p>(iii) saturated fat and trans fatty acids, the sum of which not more than 10% of energy.</p> <p><i>(b)</i> Liquid food containing –</p> <p>(i) not more than 0.005 g of cholesterol per 100 mL of food;</p> <p>(ii) not more than 0.75 g saturated fat and trans fatty acids combined per 100 mL of food; and</p> <p>(iii) saturated fat and trans fatty acids, the sum of which not more than 10% of energy.</p>
<b>Sugars</b>	(1) with the word “Low”	<p><i>(a)</i> Solid food containing not more than 5 g of sugars per 100 g of food; or</p> <p><i>(b)</i> liquid food containing not more than 5 g of sugars per 100 mL of food.</p>
	(2) with the word “Free”	<p><i>(a)</i> Solid food containing not more than 0.5 g of sugars per 100 g of food; or</p> <p><i>(b)</i> liquid food containing not more than 0.5 g of sugars per 100 mL of food.</p>
<b>Sodium</b>	(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.
<b>Protein</b>	(1) with the word “Low”	Not more than 5% of energy.
	(2) with the word “Source”	<i>(a)</i> Solid food containing not less than 10% of the Chinese NRV of protein per 100 g of food; or

<b>Component</b>	<b>Description of the claim</b>	<b>Conditions</b>
		<p>(b) liquid food containing not less than 5% of the Chinese NRV of protein per 100 mL of food; or</p> <p>(c) 5% of Chinese NRV per 100 kcal (12% of Chinese NRV per 420 kJ).</p>
	(3) with the word “High”	<p>(a) Solid food containing not less than 20% of the Chinese NRV of protein per 100 g of food; or</p> <p>(b) liquid food containing not less than 10% of the Chinese NRV of protein per 100 mL of food; or</p> <p>(c) 10% of Chinese NRV per 100 kcal (24% of Chinese NRV per 420 kJ).</p>
<b>Vitamins and Minerals provided with Chinese NRVs</b>	(1) with the word “Source”	<p>(a) Solid food containing not less than 15% of the Chinese NRV of the vitamin or mineral concerned per 100 g of food; or</p> <p>(b) liquid food containing not less than 7.5% of the Chinese NRV of the vitamin or mineral concerned per 100 mL of food; or</p> <p>(c) 5% of Chinese NRV per 100 kcal (12% of Chinese NRV per 420 kJ).</p>
	(2) with the word “High”	<p>(a) Solid food containing not less than 30% of the Chinese NRV of the vitamin or mineral concerned per 100 g of food; or</p> <p>(b) liquid food containing not less than 15% of the Chinese NRV of the vitamin or mineral concerned per 100 mL of food; or</p> <p>(c) 10% of Chinese NRV per 100 kcal (24% of Chinese NRV per 420 kJ).</p>
<b>Dietary Fibre</b>	(1) with the word “Source”	<p>(a) Solid food containing not less than 3 g of dietary fibre per 100 g of food; or</p> <p>(b) liquid food containing not less than 1.5 g of dietary fibre per 100 mL of food.</p>
	(2) with the word “High”	<p>(a) Solid food containing not less than 6 g of dietary fibre per 100 g of food; or</p> <p>(b) liquid food containing not less than 3 g of dietary fibre per 100 mL of food.</p>