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Executive Summary

Nutrition is essential for growth, tissue repair and maintenance of good health. Providing nutrition information on food labels is an important public health tool to promote a balanced diet. The Government now proposes to introduce a labelling scheme on nutrition information in prepackaged food aiming to: (1) facilitate consumers to make healthy food choices; (2) encourage food manufacturers to apply sound nutrition principles in the formulation of foods which would benefit public health; and (3) regulate misleading or deceptive labels and claims.

The following labelling scheme is proposed for public consultation-

THE PROPOSAL

Overall Proposal

We propose :

(a) To implement mandatory nutrition labelling for prepackaged food products by phases through legislative amendments to the regulations made under the Public Health and Municipal Services Ordinance (Cap 132).

Phase I - Nutrition labelling is required for prepackaged food products with nutrient-related claims. Prepackaged food products without nutrient-related claims may provide nutrition labelling on a voluntary basis in accordance with the specified requirements.

Phase II - All prepackaged food products should have nutrition labelling, except for those exempted from the requirements. Examples of exempted items include (also see Annex IV): -

(i) Food packed in a container of which the aggregated surface area is less than 100 cm^2

(ii) Fresh fruits and vegetables

(iii) Food sold at a catering establishment for immediate consumption

The proposed labelling scheme makes reference to the guidelines of the Codex Alimentarius Commission[1] (Codex) on nutrition labelling, which will not be applicable to infant/follow-up formulae, foods for infants and young children, and other foods for special dietary uses.

(b) To facilitate easy understanding of the nutrition labels and setting of nutrition claims' conditions, a set of local Nutrient Reference Values[2] (NRVs) for nutrition labelling purposes will be established, making reference to those recommended by Codex and other countries.

The Labelling Requirements

(1) Nutrition Labelling

(a) When nutrition labelling is applied, the nutrient content of a food should be listed in a standardized manner.

(b) A set of "nine core nutrients" plus "energy" are proposed to be labelled. The nine core nutrients include :

(i) Protein;

(ii) Available carbohydrate (i.e. carbohydrate excluding dietary fibre);

(iii) Total fat;

(iv) Saturated fat;

(v) Cholesterol;

(vi) Sugars;

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[1] The Codex Alimentarius Commission (Codex) was created in 1963 by the Food and Agricultural Organisation and World Health Organisation as an international authority to set food-related standards and guidelines.

[2] Nutrient Reference Values (NRVs) are a set of values used for labelling purposes and consist of one single value for each individual nutrient. NRVs are intended to assist consumers in evaluating the contribution of a food to their daily nutrient intake and to compose a diet suitable for their individual needs.

(vii) Sodium;

(viii) Dietary fibre; and

(ix) Calcium.

(c) In addition to the nine core nutrients and energy, nutrient content of other nutrients may also be listed on the nutrition label voluntarily. For vitamins and minerals with NRV established, they must be present in amounts greater than 5% of the NRV per 100g (or per 100ml) if declaration is being made.

(d) Nutrient Content Expression –

Energy/nutrients have to be expressed in either of the following manner :

(i) in absolute amount in kilocalories/metric unit per 100 g (or per 100 ml) of food; and/or

(ii) if the package contains only a single portion, in absolute amount in kilocalories/metric unit per package.

In addition, energy/nutrients may be expressed :

(i) in absolute amount in kilocalories/metric unit per serving as quantified on the label; or

(ii) in relative amount in terms of percentages of the local NRVs per 100 g (or per 100 ml) or per serving as quantified on the label.

In any case, energy may further be expressed in kilojoules.

(2) Nutrient-related Claims

(a) The only nutrient-related claims (i.e. nutrient content claims, nutrient comparative claims or nutrient function claims) [3]

[3] "Nutrient content claim" is a claim which describes the level of a nutrient contained in a food (e.g. "High calcium"; "Low fat").
"Nutrient comparative claim" is a claim which compares the nutrient levels of two or more similar food products (e.g. "Reduced fat – 25% less than the regular product of the same brand").
"Nutrient function claim" is a claim that describes the physiological role of a nutrient in growth, development and normal functions of the body. (e.g. Calcium aids in the development of strong bones and teeth. Product X is high in calcium).

permitted shall be those relating to energy, protein, carbohydrate, fat and components thereof, cholesterol, sugars, dietary fibre and sodium, plus vitamins and minerals for which NRVs have been laid down for nutrition labelling purpose, and those meeting the Codex's principles and conditions for making such claims.

(b) It will be mandatory to declare the amount of any nutrient for which a claim is made.

Timeframe of Implementation

To allow sufficient time for the trade to prepare for the changes, and taking into account the wide variety of foods that will be affected and the shelf-lives of a large variety of prepackaged food products, we propose:

(a) A two-year grace period would be allowed before implementing Phase I of the proposed labelling scheme (i.e. voluntary unless with claims); and

(b) Phase II (mandatory nutrition labelling) would be implemented three years after the implementation of Phase I.

VIEWS SOUGHT

We invite you to give your comments and views on the proposal. Please send your comments by mail, facsimile or e-mail to us at the following address by 31 January 2004:

Health, Welfare and Food Bureau
(Attn: Consultation on Nutrition Labelling Scheme)
10/F, Citibank Tower,
3 Garden Road,
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Facsimile : (852) 2136 3282
E-mail address : nutrition_labelling@hwfb.gov.hk

CHAPTER 1 INTRODUCTION

1.1 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.

1.2 Providing nutrition information on food labels is an important public health tool to promote a balanced diet. Food label is an important communication channel whereby consumers can obtain specific information on individual food products. The existing food legislation in Hong Kong does not include specific provision for nutrition information on food labels.

1.3 The Government completed a feasibility study on nutrition labelling in 2002. In the course of conducting the feasibility study, we reviewed the local situation and international practice on nutrition information on food labels. As part of the Government's ongoing efforts to enhance public health, the Government believes that it is now high time to introduce a labelling scheme on nutrition information to Hong Kong aiming to: (1) facilitate consumers to make healthy food choices; (2) encourage food manufacturers to apply sound nutrition principles in the formulation of foods which would benefit public health; and (3) regulate misleading or deceptive labels and claims.

1.4 Overseas experience shows that labelling of nutrition information can have positive impact on food consumption behaviour. In many countries, it also helps save healthcare costs and human lives.

1.5 This document puts forward a proposal with recommendations on the detailed components of the labelling scheme on nutrition information to be introduced to Hong Kong. We invite you to comment on the proposal so that it can meet the public health needs as well as your needs.

CHAPTER 2 BACKGROUND INFORMATION

What are nutrients

2.1 Nutrient refers to any substance normally consumed as a constituent of food which provides energy or is needed for growth and development and the maintenance of healthy life, or a deficit of which will cause characteristic bio-chemical or physiological changes. Broadly speaking, nutrients are classified into two main groups, namely (1) energy-producing nutrients (also called macronutrients) which include carbohydrate, fat and protein; and (2) micronutrients such as vitamins and minerals.

2.2 While undernutrition is not a major public health problem in Hong Kong nowadays, chronic degenerative diseases such as coronary heart disease, diabetes and certain types of cancer have become more common. Although the causes of these diseases are often multifactorial, an imbalanced diet is one of the important causes. To have a balanced diet, excessive intakes of fat, cholesterol, sugars and sodium are discouraged whilst increased intake of other nutrients such as dietary fibre is promoted.

Types of nutrition information on food labels

2.3 In general, there are four types of nutrition information that can be found on food labels. They are: -

(1) Nutrition labelling;
(2) Nutrition claims;
(3) Function claims; and
(4) Health claims.

Nutrition labelling

2.4 Nutrition labelling refers to the listing of the nutrient content

of a food in a standardized manner. The information is often presented in a tabulated format. When nutrition labelling is applied, energy content and the nutrient content of a core list of nutrients (i.e. core nutrients) should always appear on the nutrition label. The Codex Alimentarius Commission[4] (Codex) recommends that in addition to energy, the core list of nutrients, at a minimum, should include protein, available carbohydrate and fat; other nutrients which are considered to be of local public health significance could also be included. Outside the core list, other nutrients such as vitamins and minerals may also be declared on an optional basis. In addition, the amount of any nutrient for which a nutrient-related claim is made should always be declared.

2.5 Energy and nutrient content are commonly expressed in absolute amounts "per 100 g" for solid food or "per 100 ml" for liquid food or "per serving". Expressions in terms of "per 100 g" or "per 100 ml" bases enable consumers to compare the nutrient content of different food products directly. On the other hand, "serving size" can be represented by different household measures such as cupful or spoonful, or as a fraction of the product (e.g. one half, one third). Consumers may in this way find it easier to relate the energy and nutrient content values to their actual food intake.

2.6 Currently, a number of different forms of nutrition labelling can be found in the market. They may differ in terms of the number and types of nutrients being listed, or the expression unit and the format being used. Examples of nutrition labels are shown in **Annex I**.

Nutrition claims

2.7 There are two main types of nutrition claims, namely: -

(a) *Nutrient content claim* which describes the level of a nutrient contained in a food.
(e.g. 'High calcium'; 'Low fat'; 'Sugar-free')

[4] The Codex Alimentarius Commission (Codex) was created in 1963 by the Food and Agricultural Organisation and World Health Organisation as an international authority to set food-related standards and guidelines.

(b) *Nutrient comparative claim* which compares the nutrient levels of two or more similar food products.
(e.g. 'Reduced fat – 25% less than the regular product of the same brand')

Function claims

2.8 There are two main types of function claims, namely: -

(a) *Nutrient function claim* which describes the physiological role of a nutrient in growth, development and normal functions of the body.
(e.g. Calcium aids in the development of strong bones and teeth. Product X is high in calcium.)

(b) *Other function claim* which describes the physiological role of a food or its constituents in normal functions or biological activities of the body.
(e.g. Live lactobacilli may help improve intestinal microbial balance. Product Y contains n grams of live lactobacilli.)

Health claims

2.9 The public health implications of claims on products have aroused much public concern, since some claims relating to body functions, treatment or prevention of diseases or conditions in particular, may delay the public from seeking proper medical advice and management, and some of these claims may be exaggerated or misleading. Some of these claims appearing on foods may be considered as nutrient function claims or other function claims. Nevertheless, the Health, Welfare and Food Bureau is preparing to introduce a legislative framework to prohibit those claims that may jeopardise public health.

CHAPTER 3 THE INTERNATIONAL SCENE

3.1 Labelling of nutrition information is an evolving subject. The basic requirements agreed by the international community are stipulated in the relevant Codex guidelines.

Codex Alimentarius Commission (Codex)

3.2 The Codex was created in 1963 by the Food and Agricultural Organisation and World Health Organisation to develop food standards, guidelines and related texts such as codes of practice for protecting health of the consumers and ensuring fair trade practices in the food trade. At present, membership of Codex comprises over 160 countries including China.

3.3 The Codex adopted its Guidelines on Nutrition Labelling in 1985 and later amended them in 1993 and 2003. The Codex Guidelines on Nutrition Labelling cover all foods, except foods for special dietary uses (including infant/follow-up formulae and foods for infants and young children) which are covered under the General Standard for the Labelling of and Claims for Prepackaged Foods for Special Dietary Uses.

3.4 Under the Codex Guidelines on Nutrition Labelling (the Guidelines), the application of nutrition labelling is mandatory when a nutrient-related claim is made for a food, but voluntary in the absence of such claim. The Guidelines require that when nutrition label is applied, it should include declarations of energy, protein, available carbohydrate (i.e. carbohydrate excluding dietary fibre) and fat, plus any other nutrients which are considered to be relevant for maintaining a good nutritional status in the population concerned. Specifically, in order to declare vitamins and minerals, the vitamins and minerals concerned must be present in amounts not less than 5% of the Nutrient Reference Values (NRVs) in per 100 g (or per 100 ml) or per serving as quantified on the label.

3.5 Nutrient Reference Values (NRVs) are a set of values used for

labelling purposes and consist of one single value for each individual nutrient. NRVs are intended to assist consumers to evaluate the contribution of a food to their daily nutrient intake and to compose a diet suitable for their individual needs. Various countries have developed or adopted such values, but under different terminologies, such as Reference Labelling Values, Reference Daily Intakes, Daily Reference Values, Dietary Reference Intakes, Recommended Nutrient Intakes, Recommended Dietary Intakes, etc.

3.6 In addition to core nutrients, the Guidelines also require the declaration of the amount of any other nutrient for which a claim is made. Furthermore, where a claim is made regarding the amount and/or the type of carbohydrate, the amount of total sugars should be listed. The amounts of starch and/or other carbohydrate constituent(s) may also be listed. Similarly, where a claim is made regarding the amount and/or type of fat or the amount of cholesterol, the amounts of saturated fat, monounsaturated fat and polyunsaturated fat and cholesterol should be declared. The Guidelines also require that nutrients should be expressed in absolute amount in metric unit per 100 g (or per 100 ml) of food. If the package contains only a single portion, nutrients may be expressed in absolute amount in metric unit per package.

3.7 The Codex adopted the Guidelines for Use of Nutrition Claims in 1997. These guidelines laid down the appropriate criteria for making nutrient content claim, nutrient comparative claim and nutrient function claim. In essence, nutrient content claim should only be made when a specified maximum or minimum level of that particular nutrient is present; nutrient comparative claim should only be made when the reference food is clearly identified and a specified amount of difference in the amount of that particular nutrient is present between the comparison foods; and nutrient function claim should only be made based on scientific substantiation.

International development

3.8 In recent years, there is clearly a global movement towards labelling of nutrition information. Various places have developed their

labelling scheme on nutrition information based on the Codex's principles.

3.9 The European Union and Singapore have adopted the approach that nutrition labelling is voluntary unless with nutrient-related claims whilst the United States of America, Canada, Australia, New Zealand, Japan and Malaysia have taken the approach to require mandatory nutrition labelling. Countries currently adopting the voluntary approach including countries of the European Union, however, are taking active steps moving towards mandatory labelling. Detailed information on the labelling schemes in different economies can be found in **Annex II**.

CHAPTER 4 SITUATION IN HONG KONG

Existing legislation

4.1 With regard to nutrition labelling, the existing legislation in Hong Kong does not impose any specific requirements. Although many prepackaged foods sold in Hong Kong carry nutrition labels, the information presented and the formats used are not consistent. Hence consumers may find the information provided on the nutrition labels difficult to comprehend, inconsistent and in some cases misleading.

4.2 In relation to claims, there are products in the local market which are claimed for a particular health or physiological purpose. Depending on the contents and the claims of these products, they are subject to regulation by a number of relevant ordinances, namely the Public Health and Municipal Services Ordinance (Cap 132), Pharmacy and Poisons Ordinance (Cap 138), the Chinese Medicine Ordinance (Cap 549) and Undesirable Medical Advertisement Ordinance (Cap 231).

4.3 Under Section 61 of the Public Health and Municipal Services Ordinance (Cap 132), any person who sells or displays for sale any food which is presented with a label that falsely describes the food, or is calculated to mislead as to its nature, substance or quality, shall be guilty of an offence. The same provision also defines that a label or advertisement which is calculated to mislead as to the nutritional or dietary value of any food is calculated to mislead as to the quality of the food. However, there are no specific provisions in Cap 132 governing labelling requirements and standards for nutrition information, particularly in relation to those food products with their various nutrient-related claims.

4.4 The Food and Drugs (Composition and Labelling) Regulations [Schedule 3, Item 2(4B)] of Cap 132 also requires that if special emphasis is made on the presence of a particular ingredient, the labelling should include a declaration of either the minimum percentage by weight of that ingredient in the food or the actual amount of that ingredient in the food, determined as at the time of its use in the preparation of the food. On

the other hand, if special emphasis is made on the low content of a particular ingredient, the labelling should include a declaration of either the maximum percentage by weight of that ingredient in the food or the actual amount of that ingredient in the food, determined as at the time of its use in the preparation of the food. However, there is neither a legal definition of "nutrient" nor standards on claims such as "high" or "low" of a particular nutrient. Therefore, claims related to the level of nutrients could not be adequately regulated under the provisions of the existing Regulations.

Local market survey

4.5 The Food and Environmental Hygiene Department conducted a local market survey in 2001/2002 on nutrition information on prepackaged food labels. The objectives of the survey were to (1) determine the prevalence of nutrition labels and related claims; (2) examine the content of nutrition labels; and (3) to study the kinds of nutrient-related claims used.

4.6 Of the 1,004 food items covered by this survey, 425 (42%) carried Chinese and/or English nutrition labels, 190 (19%) carried nutrition claims, and 34 (3%) carried nutrient function and/or health claims. The content levels of the four major components, namely energy, protein, carbohydrate and fat were found in 88% of the food items carrying nutrition labels. For nutrition claims, the most common ones were those related to "high" or "low" levels of nutrients and those made on total fat, calcium and dietary fibre.

CHAPTER 5 FACTORS FOR CONSIDERATION

5.1 In considering and determining the scope and requirements of a labelling scheme on nutrition information, the factors set out in the following paragraphs have to be taken into account.

International development and consensus

5.2 The Codex has gained international recognition on setting food-related standards. Development of the local labelling scheme on nutrition information should be in line with the relevant Codex recommendations. In addition, we should also take note of the labelling requirements in other places so that any system we put in place would not be out of step with the rest of the world.

Consumer education

5.3 Provision of nutrition information on food labels facilitates the consumers to make healthy food choices. The amount of information provided, however, needs to be carefully weighted against the general level of knowledge of the public on nutrition information. Provision of too much information may result in information overload and drawing consumer's attention from more important information. In particular, the selection of core nutrients to be declared on nutrition labels should be given thorough consideration because more information alone does not necessarily lead to better informed consumers. The labelling scheme, therefore, should be complemented with relevant public education programmes to enable consumers to properly understand and utilise the nutrition information provided on the food labels.

Compliance cost for the food trade

5.4 The costs of products may increase as a result of the change in labelling requirements. It is anticipated that re-packaging cost would

not be high, as it is a common practice among the food manufacturing industry to change the design of food packages on a regular basis. However, more information on the labels would mean additional work in the production process, and the costs of obtaining accurate information on the nutrient content of food products would add to the final production costs; the increased cost is likely to be passed onto the consumers. Cost of laboratory testing increases as the number of nutrients required to be declared increases. This could range from a rough estimate of HK$1,600 (for four major components: energy, protein, carbohydrate and total fat) to about HK$6,000 (for ten components: energy, protein, carbohydrate, total fat, saturated fat, cholesterol, sugars, sodium, dietary fibre and calcium) per food sample. However, the testing cost may be lowered in the future as more local laboratories offer such service in response to market demand. When the volume of business involved is taken into account, it is unlikely that the testing cost will add significantly to the cost of any food products, except for products with very small trade volume.

Implications on food choices

5.5 Hong Kong relies heavily on imported food. The majority of overseas food manufacturers do not cater for the Hong Kong market alone. Therefore, it is anticipated that a certain degree of trade impact is inevitable if the labelling scheme is made mandatory, in particular, for those products with small trade volume. The degree of trade impact largely depends on the costs of compliance with the labelling requirements to be imposed. Traders importing food products of small trade volume may find it costly to meet the new labelling requirements if the requirements are unique to Hong Kong. Some of these products may even pull out of the local market. On the other hand, a regulated labelling scheme on nutrition information could facilitate the trade to promote healthier and more nutritious products.

Coverage

5.6 The nutrition labelling requirements should at best cover all

prepackaged food items. However, we also need to consider the practicality of imposing such labelling requirement on all prepackaged foods, for instance, it would not be feasible to put a full nutrition label on a very small food item like a packet of chewing gum. According to the existing Food and Drugs (Composition and Labelling) Regulations of Cap 132, a number of food items are exempted from listing of ingredients. We would make reference to those exemptions and make appropriate exemptions.

Laboratory technique for analysis

5.7 Both the regulatory authority and the industry have to be allowed adequate time and resources to acquire the necessary equipment and technical know-how to produce reliable nutrient content values. If the requirements for nutrition labelling are to be imposed, in particular when they become mandatory requirements, the demand for commercial laboratory testing services would accelerate the development of the above process.

Timeframe of implementation

5.8 A reasonable grace period should be given for the food trade to enable them to familiarise with any new labelling requirements to be imposed and to allow sufficient time for compliance and depletion of existing stocks. According to our usual practice, a grace period of 18 months is considered necessary. In addition, implementation of the scheme by phases will lessen the burden, if any, on the food trade.

CHAPTER 6 PROPOSALS AND VIEWS SOUGHT

General principles

6.1 Formulation of the local labelling requirements for nutrition information would be based on Codex principles, local health situation and international practice. It aims to address the inadequacies of existing food labelling regulations and enhance public health. The labelling scheme would comprise three components, namely nutrition labelling, nutrition claims and nutrient function claims.

Overall proposal

6.2 We propose the following to achieve the objectives of introducing a labelling scheme on nutrition information -

(a) To implement mandatory nutrition labelling for prepackaged food products by phases through legislative amendments to the regulations made under the Public Health and Municipal Services Ordinance (Cap 132);
(b) To establish a set of local Nutrient Reference Values (NRVs) for nutrition labelling purposes by making reference to those recommended by the Codex (Annex III) and other countries; and
(c) To set tolerance limits of nutrient verification. Details will be published in the form of guidelines at a later date.

Options on the labelling requirements

6.3 Having considered the various factors that may affect the scope and requirements of the labelling scheme, we have the following recommendations on the labelling requirements: -

Coverage

6.4 In Phase I, nutrition labelling is required for prepackaged food

products with nutrient-related claims. Prepackaged food products without nutrient-related claims may provide nutrition labelling on a voluntary basis in accordance with the specified requirements.

6.5 In Phase II, we propose that all prepackaged food products should have nutrition labelling, except for those granted with exemption (**Annex IV).** However, products would not warrant the exemption if they carry nutrient-related claims. Examples of products exempted from nutrition labelling include (1) food packed in a container of which the aggregated surface area is less than 100 cm^2, (2) fresh fruits and fresh vegetables, (3) food sold at a catering establishment for immediate consumption, etc.

6.6 Similar to the scope covered by the Codex guidelines on nutrition labelling, the proposed scheme would not be applicable to infant/follow-up formulae, foods for infants and young children, and other foods for special dietary uses.

Rationale

6.7 At present, all pre-packaged food in Hong Kong must be labelled in the manner specified in the Public Health and Municipal Services Ordinance and its subsidiary legislation, the Food and Drugs (Composition and Labelling) Regulations (Cap 132). In line with our existing legal requirement and international practice, the proposed labelling scheme on nutrition information will be applied to prepackaged foods only.

6.8 Whilst recognising the importance of having nutrition labels in all prepackaged foods ultimately, we also consider the practicality of such requirement. For instance, it would be difficult to fit in a nutrition label on very small packages. Therefore, a list of exemptions is proposed, making reference to the existing Schedule 4 of Food and Drugs (Composition and Labelling) Regulations, which stipulate the exemptions from listing of ingredients on food labels.

6.9 The proposed scheme does not apply to infant/follow-up formulae, foods for infants and young children, plus foods for special

dietary uses as they are targeted at subgroups of the population with special dietary needs.

Core nutrients

6.10 We propose a set of nine core nutrients plus energy for nutrition labelling. The proposed core nutrients are protein, available carbohydrate (i.e. carbohydrate excluding dietary fibre), total fat, saturated fat, cholesterol, sugars, sodium, dietary fibre and calcium.

Rationale

Energy, protein, carbohydrate and fat

6.11 A modern-day epidemic, obesity, is a good example illustrating the adverse consequence of excessive intake of energy-producing nutrients. In Hong Kong, local research studies have clearly shown that the number of individuals who are overweight or obese is increasing, partly due to poor dietary habits and partly due to inactivity.

6.12 Energy content of food item, together with information on the content of energy-producing nutrients (carbohydrate, protein and fat) is the most essential information for construction of a balanced diet. Thus, they are required for listing by Codex and all nutrition labelling programmes that we have reviewed. Providing the public with such information on the nutrition labels, together with proper nutrition education, enables the public to better understand the concept of energy balance, so that they can take preventive measures against obesity and practise healthy eating.

Nutrients and health

6.13 Malnutrition, either excessive or insufficient intake of nutrients, affects health adversely. On the other hand, changes in health status may alter requirements of certain nutrients. These situations are

commonly seen in individuals with chronic diseases.

6.14 According to local health statistics, the ten leading causes of deaths in 2002 were, in descending order of frequency, malignant neoplasms (cancers) (34.0%); diseases of the heart (14.5%); cerebrovascular diseases (strokes) (9.4%); pneumonia (9.3%); chronic lower respiratory diseases (6.0%); external causes of morbidity and mortality (6.0%); nephritis, nephrotic syndrome and nephrosis (inflammatory conditions of the kidney) (3.1%); diabetes (1.7%); septicaemia (infection of the blood) (1.4%); and aortic aneurysm (ballooning of the main artery) and dissection (1.1%). Those patients who have heart diseases, strokes, renal and liver problems and diabetes require dietary therapy both for disease management and prevention of complications. Among all, avoiding excessive dietary intakes of saturated fat, cholesterol, sugars and sodium, as well as increasing the intake of dietary fibre, are the most relevant ones.

Saturated Fat and Cholesterol

6.15 The correlations between fat, cholesterol and chronic diseases, such as cardiovascular diseases, cerebrovascular diseases and certain types of cancer, have been well studied. Not all fats are detrimental to health; evidence has indicated that saturated fat and cholesterol play an important role in the above-mentioned chronic diseases. For example, increase saturated fat and/or cholesterol intake may lead to an increase in blood cholesterol, which is one of the key risk factors of cardiovascular diseases.

Sugars

6.16 Sugars, i.e., mono- and di-saccharides, are commonly found in food as sweetening or thickening agent. Controlling intake of sugars in diet plays an important role in managing body weight and diabetes. In

addition, limiting sugar intake may help prevent dental caries. The importance of managing sugar intake is revealed in various food-based dietary guidelines, such as the ones from the US, Australia and Germany, which suggest sugars should be consumed in moderation.

Sodium

6.17 Sodium is another important nutrient related to chronic diseases. For instance, limiting the sodium intake has long been identified as one of the dietary control methods for hypertension. Other than hypertension, sodium also appears to play a significant role in people with renal diseases.

Dietary Fibre

6.18 The protective role of dietary fibre has been demonstrated by numerous studies. Diet rich in fibre improves gastrointestinal health by increasing faecal bulk and reducing transit time, which in turn may lower incidence of certain types of cancer. In addition, its possible cholesterol lowering effect may benefit patients with cardiovascular diseases.

Calcium

6.19 Calcium is important for bone health. Resorption and formation of bone is a continued lifetime process and calcium contributes significantly in the maintenance of bone tissue. Results of studies revealed that low calcium intake is highly associated with osteoporosis and therefore, lack of calcium may contribute significantly to the cause of low bone mass among the population. Intake of calcium-rich food has been advocated and nutrition labelling with calcium declaration can assist such promotion.

Number and types of core nutrients

6.20 It is noted that with the higher the number of core nutrients, the trade would have to invest more resources in ensuring the nutrient contents of their products are accurately labelled. Although the addition of six core nutrients (i.e., saturated fat, cholesterol, sugars, sodium, dietary fibre and calcium) on top of the basic requirement of Codex (i.e. energy, protein, carbohydrate and fat) has duly taken into consideration local public health problems, your comments are invited whether the proposed number and types of core nutrients are appropriate.

Other nutrients

6.21 In addition to energy and the nine core nutrients, we propose that other nutrients be allowed for listing of nutrition content in the nutrition label voluntarily. For vitamins and minerals with NRV established, they must be present in amounts greater than 5% of the NRV per 100g (or per 100ml) if declaration is being made.

Rationale

6.22 The 5% NRV requirement is to ensure that the vitamins and minerals allowed for declaration voluntarily should present in significant amounts in the food products concerned.

Nutrient for which a claim is made

6.23 We propose that it be mandatory to declare the amount of any nutrient for which a claim is made. In addition, where a claim is made regarding the amount and/or the type of carbohydrate, the amount of total sugars should be listed. The amounts of starch and/or other carbohydrate constituent(s) may also be listed. Similarly, where a claim is made regarding the amount and/or type of fat or the amount of cholesterol, the amounts of saturated fat, monounsaturated fat and

polyunsaturated fat and cholesterol should be declared.

Rationale

6.24 The declarations of the amounts of nutrients in relation to certain nutrient-related claims aids in verification of such claims. There are cases where a number of nutrients interplay among each other in a certain physiological function and thus the amounts of these nutrients should also be declared. This proposal is in line with the Codex's recommendation.

Nutrient content expression

6.25 We propose to require energy/nutrients to be expressed in absolute amount in kilocalories/metric unit per 100 g (or per 100 ml) of food. If the package contains only a single portion, energy/nutrients may be expressed in absolute amount in kilocalories/metric unit per package.

6.26 In addition to the requirement mentioned in paragraph 6.25, energy/nutrients may be expressed in absolute amount in kilocalories/metric unit per serving as quantified on the label. Furthermore, nutrients with local NRV may be expressed in relative amount in terms of percentages of NRV per 100 g (or per 100 ml) or per serving as quantified on the label. In any case, energy may further be expressed in kilojoules.

Rationale

6.27 This recommendation would allow consistent expression of nutrient content in food products across the board and it would be easier for consumers to make product comparison based on nutrient content in per 100 g (or per 100 ml) of food. This proposal is in line with the Codex's recommendation. However, some places only require nutrient content to be expressed in per serving; food products produced in these places would need re-labelling or re-packaging.

Presentation of nutrient content

6.28 We propose that in Phase I, food products carrying nutrient-related claims should provide nutrition labelling. For food products without nutrient-related claims, nutrition labelling could be provided voluntarily. Notwithstanding, all nutrition labels should follow the specific requirements for the presentation of nutrient content, which include presenting the information in a tabular form and placing the label on a conspicuous area of the package (please see examples of nutrition labelling in **Annex V**). In Phase II, all prepackaged food products, unless otherwise exempted, should provide nutrition labelling following the requirements as in Phase I.

Rationale

6.29 It is not uncommon to find that when overseas countries imposed their nutrition labelling requirements, they would require nutrition labelling to be presented in a standardised format. Specific requirements for presenting nutrient content enable nutrition labels to look consistent and thus easier for consumers to find and use. This would also establish rules for fair trading. Product comparison would be more convenient and it would facilitate public education.

Nutrient content claim

6.30 We propose that the only nutrient content claims permitted shall be those relating to energy, protein, carbohydrate, and fat and components thereof (such as saturated fats), cholesterol, sugars, dietary fibre, and sodium, plus vitamins and minerals for which NRVs have been laid down for nutrition labelling purpose. A set of local NRVs for this purpose will be established.

6.31 We propose to adopt the Table of Conditions for Nutrient Content Claims included in the Codex Guidelines for Use of Nutrition Claims (**Annex VI**), which covers the descriptive wordings and conditions of use for our local requirements. A list of synonyms will also be prescribed for use. When a nutrient content claim that is listed

in the Table of Conditions is made, the conditions specified in the Table for that claim should apply. The conditions would be reviewed as new international consensus is reached.

6.32 Where a food is by nature low in or free of the nutrient that is the subject of the claim, the term describing the level of the nutrient should not immediately precede the name of the food but should be in the form "a low (naming the nutrient) food" or "a (naming the nutrient)-free food".

Rationale

6.33 The prescription of a set of synonyms for making nutrient content claims will avoid dispute because it is sometimes subjective to define whether certain descriptive wordings are synonyms. However, the prescribed list would not be exhaustive, thus we would review it from time to time as and when necessary. As regards to nutrient content claims in relation to dietary fibre, we are aware that there is currently no international consensus but the Codex is in the process of establishing certain conditions for making relevant content claims. We would incorporate these conditions once they are adopted by the Codex.

Nutrient comparative claim

6.34 We propose that the only nutrient comparative claims permitted shall be those relating to energy, protein, carbohydrate, and fat and components thereof (such as saturated fats), cholesterol, sugars, dietary fibre, and sodium, plus vitamins and minerals for which NRVs have been laid down for nutrition labelling purpose.

6.35 We propose to adopt Codex's recommendations on the principles for the use of nutrient comparative claims-

(a) The foods being compared should be different versions of the same food or similar foods. The foods being compared should be clearly identified;
(b) A statement of the amount of difference in the nutrient content related to the same quantity should be given in

close proximity to the nutrient comparative claim;

(c) The comparison should be based on a relative difference of at least 25% in the nutrient content between the compared foods. For micronutrients, a 10% difference in the NRV would be acceptable; and

(d) The comparison should be based on a minimum absolute difference in the nutrient content equivalent to the figure defined as "low" or as a "source" in the Table of Conditions for Nutrient Content Claims.

6.36 An example is shown below to illustrate how the above principles can be applied-

A nutrient comparative claim, "less fat", is to be put on the label of Brand A potato crisps of which the fat content is 24 g per 100 g of potato crisps. Applying principle (a) above, the regular version of potato crisps of the same brand is identified as the comparison food of which the fat content is 36 g per 100 g. With regard to principle (c), the relative difference in the amount of fat between the two products is calculated as (36-24) / 36 x 100%, i.e. 33%, which is more than the 25% as required. With regard to principle (d), the absolute difference in the amount of fat between the two products is (36-24) g, i.e. 12 g per 100 g, which is more than the required amount which is equal to the definition of "low fat" claim as specified in the Table of Condition for Nutrient Content Claims, i.e. 3 g per 100 g. Applying all four principles, Brand A potato crisps can carry such claim as "Less fat — 33% less than the regular product of the same brand".

Rationale

6.37 This is to ensure that any nutrient comparative claims being made are based on significant relative difference in the amount of nutrients concerned, and that the difference in the amount of nutrients concerned is also significant from a nutrition point of view.

Nutrient function claim

6.38 We propose that the only nutrient function claims permitted shall be those relating to energy, protein, carbohydrate, and fat and components thereof (such as saturated fats), cholesterol, sugars, dietary fibre, and sodium, plus vitamins and minerals for which NRVs have been laid down for nutrition labelling purpose.

6.39 We propose to adopt the principles as laid down in the Codex guidelines that-

(a) The food should be a significant source of the nutrient in the diet;

(b) The claim should be based on scientific consensus; and

(c) The claim should not imply that the nutrient could cure, treat, or prevent disease.

Rationale

6.40 This is to ensure that any nutrient function claims being made are science-based, and that misleading and untruthful claims are prevented.

Other function claim

6.41 For other function claims not related to nutrients, the existing control under Section 61 of the Public Health and Municipal Services Ordinance (Cap 132) would continue to be applied.

Timeframe of implementation

6.42 To allow sufficient time for the trade to prepare for the changes, and taking into account of the wide variety of foods that will be affected and the shelf-lives for a large variety of prepackaged food products, we propose to allow a two-year grace period before implementing Phase I of the proposed labelling scheme (i.e. voluntary

unless with claims). We propose that Phase II (mandatory nutrition labelling) would be implemented three years after the implementation of Phase I.

Views sought

6.43 We invite you and all members of the trade to let us have your comments and views on the proposal described in this Chapter. Please send your comments by mail, facsimile or e-mail to us at the following address by 31 January 2004:

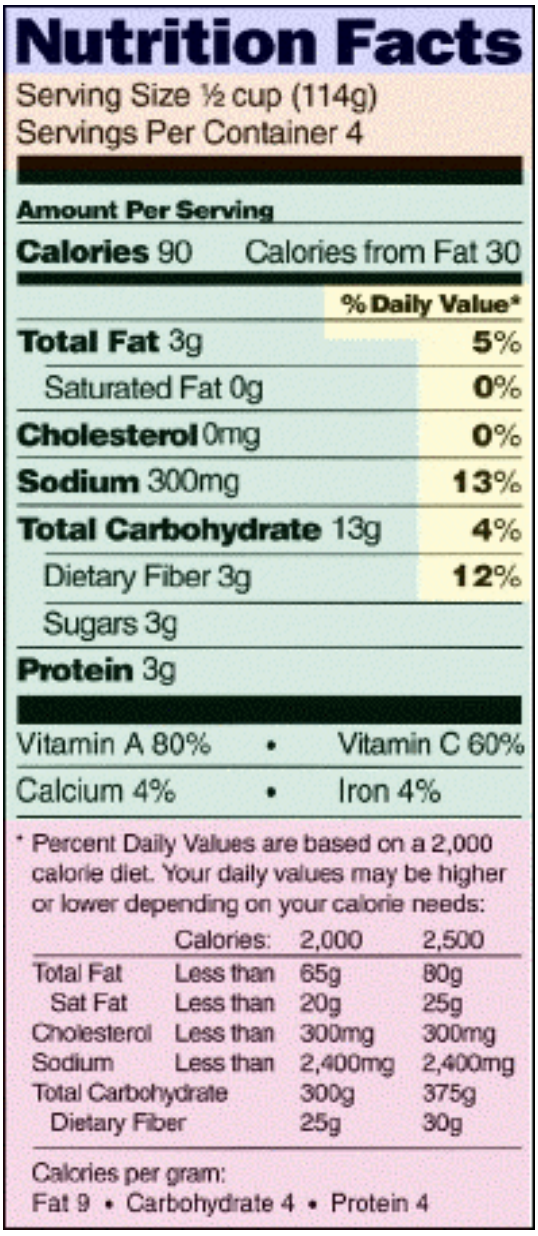
Health, Welfare and Food Bureau
(Attn: Consultation on Nutrition Labelling Scheme)
10/F, Citibank Tower,
3 Garden Road,
Hong Kong
Facsimile : (852) 2136 3282
E-mail address : nutrition_labelling @hwfb.gov.hk

6.44 We will take full account of the views received before finalizing the details of the labelling scheme.

6.45 Any person submitting views and comments should be aware that the Government may publish all or part of the views and comments received and disclose the identity of the source in such manner as the Government considers appropriate, unless he/she requests any part of the views and comments and/or his/her identity be treated in confidence.

Annex I

Examples of Nutrition Labels found in the Local Market



Nutrition Facts

Serving Size ½ cup (114g)
Servings Per Container 4

Amount Per Serving

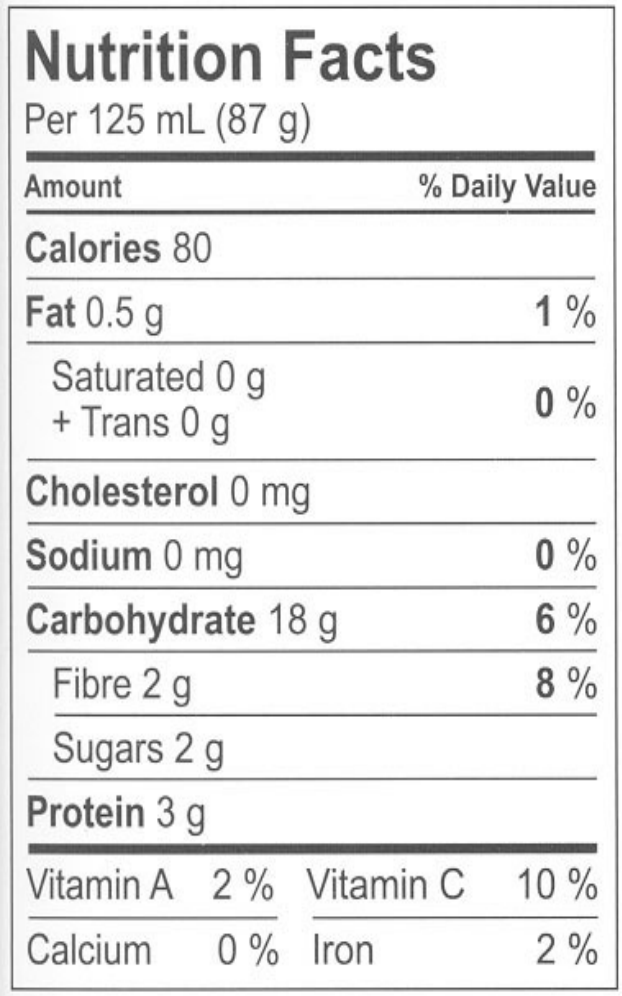
Calories 90	Calories from Fat 30
	% Daily Value*
Total Fat 3g	**5%**
Saturated Fat 0g	**0%**
Cholesterol 0mg	**0%**
Sodium 300mg	**13%**
Total Carbohydrate 13g	**4%**
Dietary Fiber 3g	**12%**
Sugars 3g	
Protein 3g	

Vitamin A 80% • Vitamin C 60%
Calcium 4% • Iron 4%

* Percent Daily Values are based on a 2,000 calorie diet. Your daily values may be higher or lower depending on your calorie needs:

	Calories:	2,000	2,500
Total Fat	Less than	65g	80g
Sat Fat	Less than	20g	25g
Cholesterol	Less than	300mg	300mg
Sodium	Less than	2,400mg	2,400mg
Total Carbohydrate		300g	375g
Dietary Fiber		25g	30g

Calories per gram:
Fat 9 • Carbohydrate 4 • Protein 4



Nutrition Facts

Per 125 mL (87 g)

Amount	% Daily Value
Calories 80	
Fat 0.5 g	**1 %**
Saturated 0 g + Trans 0 g	**0 %**
Cholesterol 0 mg	
Sodium 0 mg	**0 %**
Carbohydrate 18 g	**6 %**
Fibre 2 g	**8 %**
Sugars 2 g	
Protein 3 g	

Vitamin A	2 %	Vitamin C	10 %
Calcium	0 %	Iron	2 %

Nutrition Information	
	Typical values **per 100 g**
Energy	286 kJ 68 kcal
Protein	2.9 g
Carbohydrate	13.5 g
of which	
Sugars	5.6 g
Fat	0.2 g
of which	
Saturates	0.1 g
Fibre	3.7 g
Sodium	0.5 g

NUTRITION INFORMATION

Servings per package: 3

Serving size: 150g

	Quantity per Serving	Quantity per 100g
Energy	608 kJ	405 kJ
Protein	4.2 g	2.8 g
Fat, total	7.5 g	4.9 g
- saturated	4.6g	3.0g
Carbohydrate,	18.6 g	12.4 g
- sugars	18.6g	12.4g
Sodium	90 mg	60 mg

100 g contain / contiennent / enthalten / contengono / contienen / indeholder:	
Energy value / Valeur énergétique / Energiewert / Valore energetico / Valor energético / Energi	2200 kJ (526 kcal)
Protein / Protéines / Eiweiss / Proteine / Proteínas / Protein	6 g
Carbohydrates / Glucides / Kohlenhydrate / Carboidrati / Hidratos de carbono / Kulhydrat	56 g
Fat / Lipides / Fett / Grassi / Grasas / Fedt	31 g

營養成份表示（每袋）	
能　　量	124kcal
蛋　白　質	2.6g
脂　　質	7.5g
糖　　份	11.4g
鈉	34mg

(HK) (SG) **Ice cream with rum sauce (8%) and raisins (5%) – Ingredients:** Cream, skimmed milk, sugar, whey, water, raisins, glucose syrup, dextrose, milk protein, starches (maize, rice), egg yolk, rum, natural flavourings, lemon juice. **Nutrition:** 100 mL contain: Energy: 576 kJ (138 kcal), proteins: 2.0 g, carbohydrates: 18 g, fat: 6 g. Store at or below –18°C. Net volume: 1L. Best before: see side (dd.mm.yy). 此日期前最佳：標示於盒上 (日/月/年) *Product manufactured in Switzerland*

Annex II

Nutrition Information on Food Labels - Overseas Practice

Voluntary labelling unless with claims

European Union

The Council of the European Union issued a Council Directive on Nutrition Labelling for Foodstuffs in 1990. This Directive requires that nutrition labelling should be voluntary, unless a nutrition claim is made. In addition to the four parameters (energy, protein, carbohydrate, fat) required by the Codex, the EU further requires that the content levels of sugars, saturated fat, dietary fibre and sodium be shown if any of these four nutrients is involved in a claim. Besides, other specified macronutrients as well as certain vitamins and minerals if present in significant amounts, may be declared. In the Directive, it also prescribes that nutrition labelling be presented in tabular form, nutrients be expressed in per 100 g (or per 100 ml), and a certain order of nutrient listing should be followed.

Singapore

2. Nutrition labelling is governed in Singapore under the Food Regulations. The Regulations require that a Nutrition Information Panel (NIP) is mandatory for foods with nutrition claims. The panel consists of information on energy, protein, fat and carbohydrate. The declaration of other nutrients is optional, but mandatory for the nutrient for which a claim is made. The Regulations accept that nutrients be expressed in absolute amount in metric unit in per 100 g (or per 100 ml) and/or per serving as stated on the food label. In addition to the Food Regulations, the Health Promotion Board of Singapore also published a *Handbook on Nutrition Labelling (Singapore)* in 1998 and subsequently revised it in 2002. The authority encourages the food industry to present the suggested NIP format consisting of energy and 7 core nutrients (including protein, carbohydrate, total fat, saturated fat, cholesterol, sodium and dietary fibre); and nutrients be expressed in per 100 g (per 100 ml) and per serving of the food.

3. The Food Regulations specify a limited number of nutrient content claims. A fuller list of nutrient content claims as well as criteria for nutrient function claim is covered in the *Handbook on Nutrition Labelling (Singapore)*.

Mandatory labelling

United States of America (USA)

4. The Nutrition Labelling and Education Act (NLEA) of 1990 mandated nutrition labelling on virtually all prepackaged foods sold in the country. Before implementing the NLEA in 1994, voluntary nutrition labelling is applied on prepackaged foods. Currently 14 components are required to be declared on the nutrition label. They are total calories, calories from fat, total fat, saturated fat, cholesterol, sodium, total carbohydrate, dietary fibre, sugars, protein, vitamin A, vitamin C, calcium and iron. However, from 2006 onwards, trans fat will be added to the core list, increasing the total number of core components to 15. The regulations also prescribe a standard format (including order of listing, panel title, font size, font type, spacing, highlighting, use of lines, etc) for nutrition labelling, and require that nutrients should be expressed in per serving of food, and the serving size and number of servings should be stated. In addition, nutrients are required to be expressed as percentages of Daily Values.

5. The NLEA of 1990 also provides criteria for making nutrient content claim (covering comparative claim) and health claim.

Canada

6. The nutrition labelling system in Canada was recently reviewed, and that the Regulations Amending the Food and Drug Regulations (Nutrition Labelling, Nutrient Content Claims and Health Claims) was gazetted in 2002. It will be fully implemented in 2007 when nutrition labelling is to become mandatory for all prepackaged foods. Prior to these new regulations, nutrition labelling is voluntary unless with claims. According to the new regulations, fourteen components are required to be listed, including calories, fat, saturated fat, trans fat, cholesterol, sodium,

carbohydrate, fibre, sugars, protein, vitamin A, vitamin C, calcium and iron. Similar to the system in USA, nutrition labelling is highly prescriptive; standard formats and expression method are specified.

7. The Regulations Amending the Food and Drug Regulations (Nutrition Labelling, Nutrient Content Claims and Health Claims) also provides criteria for making nutrient content claim (covering comparative claim) and health claim.

Australia and New Zealand

8. Australia and New Zealand govern nutrition labelling under the Australia and New Zealand Food Standards Code. Under this new code which came into force in 2002, almost all foods sold in Australia and New Zealand are required to carry a Nutrition Information Panel (NIP). Declarations of energy and 6 core nutrients (i.e., protein, carbohydrate, fat, saturated fat, sugars and sodium) are required. Other nutrients may be declared voluntarily but the nutrient for which a nutrition claim is made should be declared. A format has been prescribed for the NIP and it is required that nutrients should be expressed both in per serving quantified on the label and per 100 g (or per 100 ml) of food.

9. Nutrition claims are regulated under the Australia and New Zealand Food Standards Code. In addition, a Code of Practice on Nutrient Claims in Food Labels and in Advertisements has been set out to provide a basis for voluntary self-regulation of nutrient claims by the food industry.

Japan

10. Mandatory nutrition labelling requirements, stipulated in the Health Promotion Law (former Nutrition Improvement Law), became effective on 1st May 2003 in Japan. The law requires the content of energy, protein, fat, carbohydrate and sodium to be declared on nutrition labels. The content of any nutrients involved in claims must be listed as well. The information should be expressed in absolute amount in kilocalories/metric unit per 100 g (or per 100 ml) of food. Alternatively, the information could be expressed in per serving as quantified on the label. Detailed requirements on the labelling format are also specified, including

the listing order of nutrients, font size and orientation of the nutrition label on the food package.

11. In addition to nutrition labelling, the regulations also spell out the conditions for making nutrient content claims and nutrient comparative claims.

Malaysia

12. Nutrition Labelling was instituted in Malaysia under the Food (Amendment) Regulations 2003. The Regulations were gazetted in March 2003. The Regulations require mandatory nutrition labelling for a variety of foods including cereal and bread products, milk products, flour confection, canned meat, canned fish, canned vegetables and fruit, fruit juices, salad dressing, mayonnaise and soft drinks. Foods that are fortified, enriched or supplemented, and foods that carry nutrition claims are also required to present nutrition labelling. The Regulations specify that nutrition labelling should include information on energy, protein, carbohydrate and fat, as well as the nutrient for which a nutrition claim is made. Other macronutrients and selected vitamin and minerals present in significant amounts may be declared voluntarily. Nutrients are required to be expressed in both per 100 g (or per 100 ml) and per serving as quantified on the label.

13. The Food (Amendment) Regulations 2003 also laid down appropriate criteria for making nutrient content claim, nutrient comparative claim and nutrient function claim.

Annex III

Nutrient Reference Values (NRVs) Recommended by Codex

Nutrient	Unit	NRV
Protein	(g)	50
Vitamin A	(μg)	800
Vitamin D	(μg)	5
Vitamin C	(mg)	60
Thiamin	(mg)	1.4
Riboflavin	(mg)	1.6
Niacin	(mg)	18
Vitamin B_6	(mg)	2
Folic acid	(μg)	200
Vitamin B_{12}	(μg)	1
Calcium	(mg)	800
Magnesium	(mg)	300
Iron	(mg)	14
Zinc	(mg)	15
Iodine	(μg)	150

Note: A list of local NRVs for nutrition labelling purposes will be established, drawing reference from the Codex list as well as other countries, and would include other nutrients as appropriate.

Annex IV

Proposed Exemptions from Nutrition Labelling

With reference to the list of items exempt from listing of ingredients on food labels (Schedule 4, Cap 132 Food and Drug (Composition and Labelling) Regulations), the following foods should be exempted from nutrition labelling. However, their exemption status will be lost if they carry nutrient-related claims –

1. Prepackaged drinks with an alcoholic strength by volume of more than 1.2% as determined under section 53 of the Dutiable Commodities Ordinance (Cap. 109);
2. Prepackaged food sold at a catering establishment 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 of which the aggregated surface area is less than 100 cm^2;
6. Fresh fruit and fresh vegetables;
7. Spring water, mineral water, carbonated water to which no ingredient other than carbon dioxide has been added;
8. Vinegar which is derived by fermentation exclusively from a single basic product and to which no other ingredient has been added;
9. Flavourings;
10. Raw meat, poultry (except when ground), fish and seafood; and
11. Raw prepackaged ready-to-cook dishes.

Annex V

Examples of Proposed Nutrition Labels

A) Basic format
(absolute amount per 100 g or 100 ml)

Nutrition Information	
	Per 100g or Per 100ml
Energy	kcal (kJ)
Protein	g
Fat, total	g
- Saturated fat	g
Cholesterol	mg
Carbohydrate	g
- Sugars	g
Dietary fibre	g
Sodium	mg
Calcium	mg
Insert nutrient(s) involved in claim(s)	g, mg or µg
Insert other nutrient(s) to be declared	g, mg or µg

營養資料	
	每100克 或每100毫升
熱量	千卡 (千焦)
蛋白質	克
脂肪總量	克
- 飽和脂肪	克
膽固醇	毫克
碳水化合物	克
-糖	克
膳食纖維	克
鈉	毫克
鈣	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

Nutrition Information 營養資料	
	Per 100g or Per 100ml / 每100克或每100毫升
Energy / 熱量	kcal (kJ) / 千卡 (千焦)
Protein / 蛋白質	g / 克
Fat, total / 脂肪總量	g / 克
- Saturated fat / 飽和脂肪	g / 克
Cholesterol / 膽固醇	mg / 毫克
Carbohydrate / 碳水化合物	g / 克
- Sugars / 糖	g / 克
Dietary fibre / 膳食纖維	g / 克
Sodium / 鈉	mg / 毫克
Calcium / 鈣	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

B) Basic format plus serving
(absolute amount per 100 g or 100 ml and absolute amount per serving)

Nutrition Information

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
Cholesterol	mg	mg
Carbohydrate	g	g
- Sugars	g	g
Dietary fibre	g	g
Sodium	mg	mg
Calcium	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

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
膽固醇	毫克	毫克
碳水化合物	克	克
- 糖	克	克
膳食纖維	克	克
鈉	毫克	毫克
鈣	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

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 (kJ) / 千卡 (千焦)	kcal (kJ) / 千卡 (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
Cholesterol / 膽固醇	mg / 毫克	mg / 毫克
Carbohydrate / 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
Calcium / 鈣	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) Basic format plus serving and %NRV (on per serving basis) (absolute amount per 100 g or 100 ml, absolute amount per serving and %NRV per serving)

Nutrition Information

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 Serving
Energy	kcal (kJ)	kcal (kJ)	%
Protein	g	g	%
Fat, total	g	g	%
- Saturated fat	g	g	%
Cholesterol	mg	mg	%
Carbohydrate	g	g	%
- Sugars	g	g	%
Dietary fibre	g	g	%
Sodium	mg	mg	%
Calcium	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	%

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100克或每100毫升	每食用分量	每食用分量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	%
膽固醇	毫克	毫克	%
碳水化合物	克	克	%
- 糖	克	克	%
膳食纖維	克	克	%
鈉	毫克	毫克	%
鈣	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	%

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 Serving 每食用分量的營養素參考值百分比
Energy / 熱量	kcal (kJ) / 千卡 (千焦)	kcal (kJ) / 千卡 (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	%
Cholesterol / 膽固醇	mg / 毫克	mg / 毫克	%
Carbohydrate / 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	%
Calcium / 鈣	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	%

Annex VI

Table of Conditions for Nutrient Content Claims Adopted by Codex

Component	Claim	Conditions Not More Than
Energy	Low	40 kcal (170 kJ) per 100 g (solids); or 20 kcal (80 kJ) per 100 ml (liquids)
	Free	4 kcal per 100 ml (liquids)
Fat	Low	3 g per 100 g (solids) 1.5 g per 100 ml (liquids)
	Free	0.5 g per 100 g (solids) or 100 ml (liquids)
Saturated Fat	Low*	1.5 g per 100 g (solids) 0.75 g per 100 ml (liquids) and 10% of energy
	Free	0.1 g per 100 g (solids) or 100 ml (liquids)
Cholesterol	Low*	0.02 g per 100 g (solids) 0.01 g per 100 ml (liquids)
	Free	0.005 g per 100 g (solids) or 100 ml (liquids)
		and, for both claims: 1.5 g saturated fat per 100 g (solids) 0.75 g saturated fat per 100 ml (liquids) and 10% of energy of saturated fat
Sugars	Free	0.5 g per 100 g (solids) or 100 ml (liquids)
Sodium	Low	0.12 g per 100 g
	Very low	0.04 g per 100 g
	Free	0.005 g per 100 g

Component	**Claim**	**Conditions** **Not Less Than**
Protein	Source	10% of NRV per 100g (solids) 5% of NRV per 100ml (liquids) or 5% of NRV per 100 kcal (12% of NRV per 1 MJ) or 10% of NRV per serving
	High	2 times the values for "source"
Vitamins and Minerals	Source	15% of NRV per 100g (solids) 7.5% of NRV per 100ml (liquids) or 5% of NRV per 100 kcal (12% of NRV per 1 MJ) or 15% of NRV per serving
	High	2 times the values for "source"

Dietary fibre – Codex is currently drafting the condition for nutrient content claims in relation to dietary fibre. We would incorporate these conditions into our Nutrition Labelling Scheme once they are adopted by Codex.

* In the case of the claim "low in saturated fat", trans fatty acids should be taken into account where applicable. This provision consequentially applies to foods claimed to be "low in cholesterol" and "cholesterol free".