

Nutrition Labelling Scheme in Hong Kong- Questions Encountered by Trade

Workshop on Nutrition Labelling Scheme

Centre for Food Safety



Nutrition label

Is rounding of nutrient values mandatory ?

- Nutrient contents declared on nutrition label can be rounded as necessary (may refer to recommendations in the Technical Guidance Notes). They can also be presented as exact values.
- When rounding small values to “0”, the definition of “0” mentioned in the Technical Guidance Notes should be referred to, so that it would not be confusing or misleading.
- All nutrition information must be correct and not misleading or deceptive.

How to classify and label liquid and solid foods ?

- In general, it should be determined basing on the status of food **as sold**
 - Ice cream: solid
 - Semi-solid food, e.g. yoghurt : solid
 - Mixed solid and liquid food, e.g. Borsch, porridge, congee: solid
- In nutrition label, the amount of both liquid and solid foods can be presented in terms of “gram” or “millilitre”, but it is preferable to present solid food in “gram” and liquid food in “millilitre”.

How to determine and present nutrient contents?

- In nutrition label, nutrient contents should be provided for the form of food as sold
- In addition, extra information on nutrient contents for the form as consumed can also be provided, if :
 - it has been specified as such; and
 - clear instruction for preparation is provided on package

How to determine and present nutrient contents?

■ Based on **milk powder** before reconstitution

Nutrition Facts		Per 100g
Energy	1400 kJ	
Protein	30.7g	
Total fat	1.5g	
- Sat. fat	1.0g	
- Trans fat	0g	
Carb	49.7g	
- Sugars	49.7g	
Sodium	450mg	

■ Based on **milk powder** before reconstitution and reconstituted **liquid milk**

Nutrition Facts		
	Per 100g	Per 250mL cup*
Energy	1400 kJ	348kJ
Protein	30.7g	7.8g
Total fat	1.5g	0.4g
- Sat. fat	1.0g	0.3g
- Trans fat	0g	0 g
Carb	49.7g	12.3g
- Sugars	49.7g	12.3g
Sodium	450mg	113g

*Adding 25g milk powder to 235mL water

■ Based on reconstituted **liquid milk**

Nutrition Facts	
	Per 250mL cup*
Energy	348kJ
Protein	7.8g
Total fat	0.4g
- Sat. fat	0.3g
- Trans fat	0 g
Carb	12.3g
- Sugars	12.3g
Sodium	113g

*Adding 25g milk powder to 235mL water

What is “Nutrient Reference Values”?

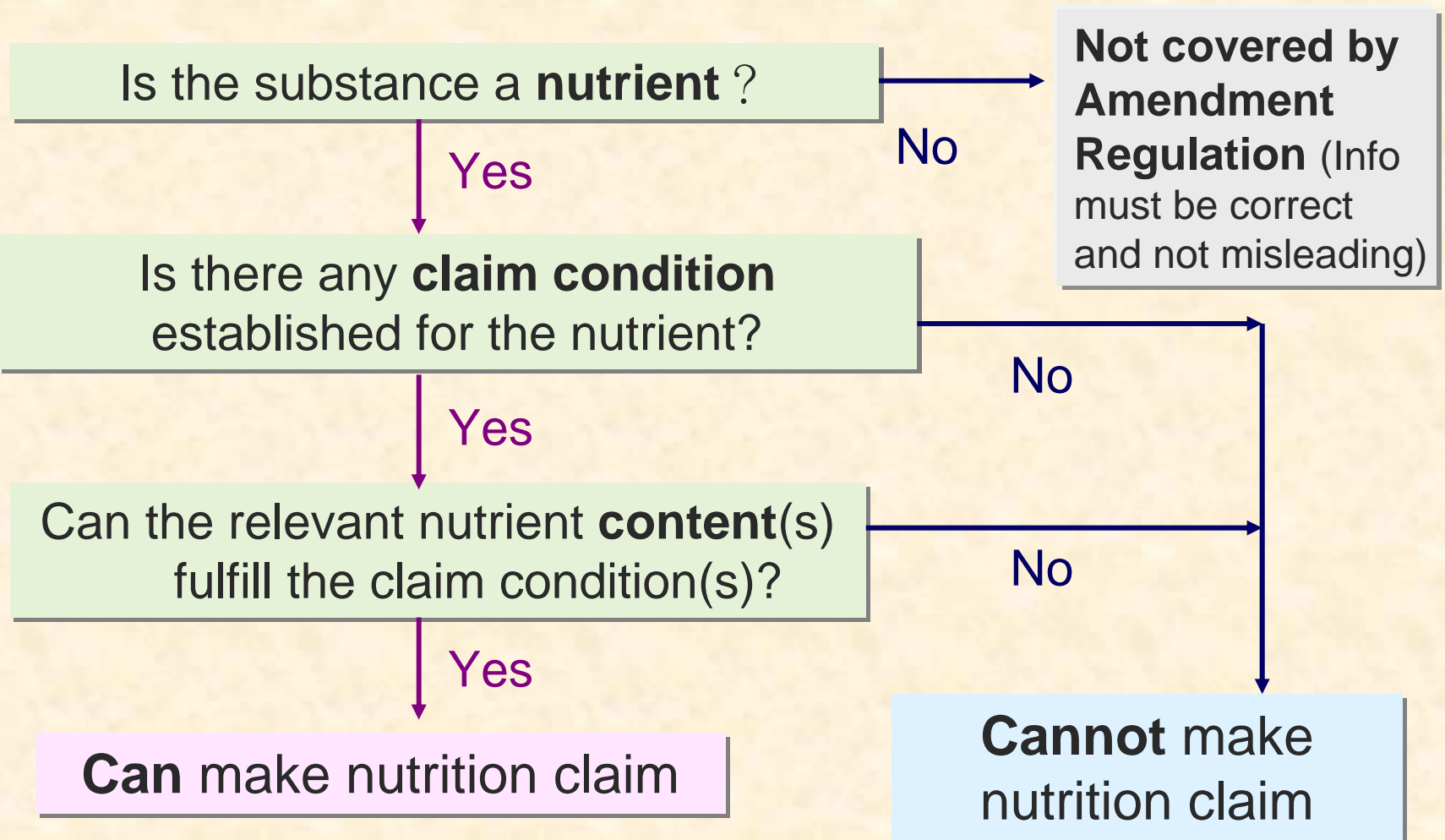
- Nutrient Reference Values (NRV) is a set of reference values used in nutrition labelling as a standard for comparing the nutrient contents among different food.
- NRV serves as a scale to help consumers make food choices. It is convenient for the trade to use and facilitates consumers to compare and choose food products.
- NRV was set up with reference to the nutrient requirement of different population groups. However, consuming food providing 100% NRV does not imply the nutrient requirement of particular population group could be met.
- A set of NRV (“Chinese NRV”) has been established in the Amendment Regulation for reference.

How to use NRV in nutrition labelling?

- In nutrition label, the nutrient contents in a percentage of reference value (% NRV) could be declared as supplementary information.
 - Recommended to use “Chinese NRV” in the calculation. However, reference values established by other international/national food/health authorities could also be used
 - Declaration of %NRV is NOT a mandatory requirement
- When making nutrition claims, some conditions are based on calculation of NRV (e.g., “high”/ “contain” protein/vitamins/minerals). In such situation, “Chinese NRV” must be used.

Nutrition Claims

Can I make nutrition claim on a certain substance?



Can I make nutrition claim on these nutrients?

- Starch X
- Amino Acids X
- Glucose X
- Omega 3 X

- No condition established for nutrient content claims, thus cannot make nutrient content/comparative claims
- No Chinese NRV, thus cannot make nutrient function claims

Are these nutrition claims?

- 100% organic/ natural/ fresh ✗
- 100% oat ✗
- Soy free/ Dairy free ✗
- With antioxidants ✗
- No hormones ✗
- Yeast free ✗
- With probiotics ✗
- Low salt ✓ = low sodium

Are these nutrition claims?

“0g Sat. fat per xxx”/ “0g Sat. fat”/ “0 Sat. fat”/ “Zero sat. fat”

Quantitative declaration

e.g. “0g sat. fat per 100g biscuit”

[must meet requirements stated in para 31vi of the Tech. Guidance Notes]

(Table 2 of Tech. Guidance Notes:
Definition of “0”)

Nutrient content claim- “Free”

Must meet the nutrient content claim condition of “free” for sat. fat in Amendment Regulation (Tech. Guidance Notes Annex III)

Nutrient	Definition of “0” in nutrition label (per 100g/mL)	Definition of “zero” or “free” in nutrient content claim
Saturated fat	≤ 0.5g	Not more than 0.1g of saturated fat and trans fatty acids combined per 100g/mL of food

Are these nutrition claims?

- Same principle applies to other nutrients, e.g.,
 - “0 g trans fat per 100 g” → Quantitative declaration
 - ≤ 0.3 g trans fat per 100g food
 - “0 g trans fat”
 - “zero trans fat”
 - “0 trans fat”
- Diagram: A bracket groups the three claims “0 g trans fat”, “zero trans fat”, and “0 trans fat”, with an arrow pointing to the text “Nutrient content claim ‘Free’”.

Nutrient content claim “Free”

Trans Fat

(1) with the word “Free”

(a) Solid food containing –

- (i) not more than 0.3 g of trans fat 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 contributes not more than 10% of energy.

(b) Liquid food containing –

- (i) not more than 0.3 g of trans fat per 100 mL of food;
- (ii) not more than 0.75 g of saturated fat and trans fatty acids combined per 100 mL of food; and
- (iii) saturated fat and trans fatty acids, the sum of which contributes not more than 10% of energy.

Are these nutrition claims?

- “No oil” / “Low oil” / “Less oil”

↓ ↓ ↓
No fat Low fat Less fat

- “Oil” means “fat” in general
- Must satisfy the respective claim conditions

Are these nutrition claims?

- “Oats are rich in dietary fibre”
 - If oat is the sole ingredient of the product:
 - it is a nutrient content claim on the relevant product
 - product must meet relevant claim conditions
 - If oat is not the sole ingredient and the presentation implies that the whole product contains high level of fibre:
 - If the fibre content of the product is not “high”, the presentation may be considered misleading

Can I make nutrition claim on soluble fibre ?

- Soluble fibre is a dietary fibre
- According to Amendment Regulation, “dietary fibre” means any fibre analyzed by means of any official method adopted by AOAC. Soluble fibre is one of those.
- Nutrient content claim for soluble fibre should meet the claim condition for dietary fibre

“Calcium content equivalent to a cup of milk” – is it nutrition claim?

- Consider case-by-case, e.g.
- “Rich in calcium- calcium content in one package equivalent to a cup of milk”
 - **Nutrient content claim** (“High calcium”)
- “A pack of biscuit (100g) contains 400mg calcium calcium content equivalent to a cup of milk”
 - **Quantitative declaration**

How to interpret conditions for nutrition claims?

- In general, the form of food as sold would be considered when determining whether the food is solid or liquid, and when determining the energy/nutrient content in food
e.g. milk powder (before reconstitution, solid);
concentrated juice (before reconstitution, liquid)
- For products that have to be reconstituted with water before consumption, nutrition claims can be made on the form as consumed after reconstitution, if-
 - specified as such, following instructions provided on package
 - preparation instructions should be clearly stated on package
 - e.g. liquid milk reconstituted from milk powder,
reconstituted juice from juice concentrate
- Tolerance limit not applicable to claim conditions

How to make nutrient comparative claims?

1. Select food being compared
 - Same food of different brands (e.g. Brand A and Brand B potato chips)
→ consider how to confirm/update nutrient information of products from another brand
 - Different versions of the same brand of food (e.g. Brand A original potato chips and Brand A low fat potato chips)
→ different versions available for the same brand?
 - Food of the same category/food group (e.g. potato chips and prawn crackers)
→ how to get data? recognized database?

(* the comparison must be based on the same quantity of food)

How to make nutrient comparative claims?

2. Determine whether the nutrient content in food satisfies with relevant claim conditions
 - Refer to Table 5 of Technical Guidance Notes
 - Must meet both the conditions for “minimum relative difference” and “minimum absolute difference”
 - If claim condition involves NRV, the “Chinese NRV” established in the Amendment Regulation must be used

How to make nutrient comparative claims?

3. The nutrient comparative claim must:

- Describe the food being compared
- Describe the amount of difference in energy or nutrient (absolute value or as a percentage or a fraction)

* Also recommended to include the absolute value of the energy/nutrient content in the reference food to facilitate comparison

Can I make a certain nutrient function claim?

The targeted nutrient has (i) **nutrient content claim condition**; or (ii) **Chinese NRV**

Yes

The claim is based on **scientific substantiation** and **scientific consensus** (If there is currently no consensus, e.g. research result only published on individual journals but there is no international consensus on the function, this requirement is not fulfilled)

Yes

Content of claimed nutrient in product meet conditions of nutrient content claim for “**source**” (for protein, dietary fibre, vitamins, minerals)

Yes

Can make nutrient function claim ;
the claim must contain information on the physiological role of the claimed nutrient

No

No

No

Cannot make such nutrient function claim

~ End ~