



中華人民共和國香港特別行政區政府總部食物及衛生局  
Food and Health Bureau, Government Secretariat  
The Government of the Hong Kong Special Administrative Region  
The People's Republic of China

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Your Ref : CB(4)/PAC/R57

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4 January 2012

Clerk to Public Accounts Committee  
Legislative Council Complex  
1 Legislative Council Road  
Central  
Hong Kong  
(Attn: Ms Miranda HON)  
(Fax No. : 2840 0716)

Dear Ms Hon,

**The Director of Audit's Report on the  
Results of Value for Money Audits (Report No.57)**

**“Food Labelling” and “Nutrition Labelling  
of Infant and Special Dietary Foods”**

Thank you for your letter dated 13 December 2011. I write to provide you in response to the various issues set out in your letter.

- (a) The Centre for Food Safety (CFS) had adopted a risk-based inspection approach as recommended in Independent Commission Against Corruption (ICAC)'s assignment report on enforcement of food labelling requirements since 1 April 2011. A database has been developed whereby all food outlets selling prepackaged food have been profiled as high, medium and low risk (with ethnic shops and snack shops being categorised as high and medium risk group). High and medium risk shops have been covered in routine and targeted inspections. Health Inspectors are required to inspect about 50%,

30% and 20% of food labels from high risk, medium risk and low risk premises respectively with submission of bi-weekly “Workdone Report for Label Checking/Sampling at Retail Outlets”. The Internal Guidelines for Food Labelling Unit (FLU) has been revised accordingly to set out the above new risk-based inspection requirement. The revised “Internal Guidelines for Food Labelling Unit (April 2011)” and the “Workdone Report for Label Checking/Sampling at Retail Outlets” are attached at **Annex I** and **II** respectively. Section (B)(IV) of the Internal Guidelines for FLU specifies the new risk-based inspection requirement while Sections (J) and (M) set out the conditions under which the Health Inspectors should institute prosecution and issue of advisory/warning letters.


- (b) In relation to a case against general labelling irregularity on 9 October 2009, the magistrate commented that FLU should ascertain the circumstantial evidence for future prosecution. It was regretted that the magistrate’s advice had not been followed up promptly but improvement measures have since been implemented in early 2011. Health Inspectors of FLU are required to ascertain, under the supervision of Senior Health Inspectors, the possession of circumstantial evidence before taking out prosecution since February 2011. To better equip the staff concerned with the necessary legal knowledge, training courses are being conducted by the Training Section of the Food and Environmental Hygiene Department on evidence collection.
- (c) At present, there are 28 brands of infant formula in the retail market according to CFS’s records. CFS would take a total of 48 samples from among these different brands for testing of the 33 nutrients as required under Codex. The testing will be conducted in two stages with 28 samples in 2012 and the remaining 20 in 2013. The 28 samples in 2012 would be taken from the most popular infant formula (0-6 months or 0-9 months) of each brand. For the 20 samples in 2013, priority would be given to other infant formulae and formulae for 9 months or above.
- (d) A Taskforce on Hong Kong Code of Marketing of Breastmilk Substitutes was set up under the Director of Health (DH) in June 2010 to develop a Code of Marketing of Breastmilk Substitutes applicable to Hong Kong (Hong Kong Code). The objective of the Hong Kong Code is to regulate manufacturers and distributors of breastmilk substitutes and related products to prevent them from advertising and

marketing their breastmilk substitutes and related products by way of malpractices. Besides, it is proposed that requirements including nutritional labelling and claims of breastmilk substitutes and related products will be covered in the Hong Kong Code. It is expected that the drafting of the Hong Kong Code will be completed by early 2012. Upon completion of the drafting of the Hong Kong Code, DH will consult the trade and collect the views of various parties. It is expected that the Hong Kong Code will be implemented within 2012.

Upon implementation of Hong Kong Code, CFS and DH will continue to work closely to monitor the trade's adherence to the Hong Kong Code. Subject to the responses of the trade to the Hong Kong Code, the Government will consider in due course whether specific law or regulation governing nutritional composition and labelling of infant foods is necessary. In 2012, CFS will conduct testing on the nutritional composition of infant formula available in the market in order to gather more information for future preparatory legislative work.

- (e) Codex standards, including those for infant formula, are international standards for reference. They are non-binding and voluntary in nature, and are established to provide reference for jurisdictions in formulating their own regulations based on their local situation. However, they would serve as references by the World Trade Organisation in settling international trade disputes. Since it is not a legal requirement in Hong Kong to comply with Codex standards, no enforcement action has been taken. That said, traders are encouraged to adopt relevant Codex standards as appropriate as a matter of good practice.
- (f) CFS adopts a risk-based approach in its strategies and the planning and implementation of food safety control measures. Based on available information, there is no evidence suggesting that formula-fed infants are deficient of iodine or biotin and hence detailed investigation into this matter was not carried out. CFS is currently working together with DH and other experts and members of the Taskforce on Hong Kong Code of Marketing of Breastmilk Substitutes and will consider incorporating the relevant Codex nutrition labeling requirements and composition of infant formula into the Hong Kong Code.

Yours sincerely,



( Gillian LAM )  
for Secretary for Food and Health

c.c. Secretary for Financial Services and the Treasury (Fax no.: 2147 5239)  
Director of Audit (Fax no.: 2583 9063)  
Director of Food and Environmental Hygiene (Fax no.: 2877 9507)  
Director of Health (Fax no.: 2893 9613)

## **INTERNAL GUIDELINES FOR FOOD LABELLING UNIT**

### **(A) MAJOR DUTIES OF HIs(FL)**

- Label checking
- Sampling of prepackaged food
- Handling of complaints
- Reply written and verbal enquiries
- Comment on food label of milk and dairy products
- Processing the notification of the name and full address of manufacturer or packer of the prepackaged food submitted by the distributor or brand owner in Hong Kong
- Blitz operations
- Follow up discrepancy cases e.g. issue enquiry letter and warning letter
- Law enforcement
- Health education

### **(B) DIVISION OF WORK**

#### **(I) By territory**

- The whole territory is divided into 10 major areas and 1 HI(FL) is responsible for 1 major area.

#### **(II) By country of origin**

- The whole world is divided into 10 major global regions.
- Each HI(FL) is responsible for food items imported from certain countries.

#### **(III) By food category**

- All prepackaged foods are divided into 10 major categories.
- Each HI(FL) is assigned with a specific food category for label checking.
- Food categories for HIs(FL) will be rotated on a monthly basis.

**(IV) By risk-based premises**

- Database on food outlets selling prepackaged food has been compiled. Updating of database is an on-going process.
- Food outlets selling pre-packaged food will be classified as high, medium and low risk premises.
- The risk type is based on:
  - management of the shop;
  - scale of the business (e.g. chain store);
  - type of food sold (e.g. health food is high risk because of nutrient claims);
  - past adverse record (e.g. premises with previous labelling irregularities detected are classified as high risk)

**(C) LABEL CHECKING**

- General target in a year: about 55,000
- HIs(FL) will conduct routine label checking on assigned food category mainly in their respective areas.
- Label checking during weekly blitz operations by all HIs(FL) in selected district/area arranged by SHIs(FL).
- Follow-up label checking on complaints.
- Ad hoc issue on food products receiving public attention.

**(D) SAMPLING PROGRAMME**

**(I) Sampling for Analysis**

- Scheduled programme with specific food item and test type pre-arranged by Government Chemist.
- Each HI(FL) is assigned to take food samples (number and type of samples) according to their assigned country of origin.
- Follow-up sampling. e.g. complaint and re-sampling of unsatisfactory samples.
- Ad hoc sampling as required by Government Chemist. (e.g. seasonal food and food products receiving public attention)

**(II) Sampling for Labels Checking**

- Ad hoc sampling for detailed label checking as required by Government Chemist and senior officers.
- Follow up sampling e.g. complaints.

**(E) ACTION PLAN FOR HIs(FL)**

- Bi-weekly programme with location plan will be prepared by individual HI(FL).
- Work plan should include the date and zone(s) for label checking and sampling.
- The programme is based on criteria and requirements outlined in paragraphs B, C & D above.
- The programme is to be endorsed by SHIs(FL) before implementation.
- SHIs(FL) will conduct surprise checking on the performance of HIs(FL).
- All supervisory checks will be documented.

**(F) BLITZ OPERATION**

- Pre-arranged by SHIs(FL) on a weekly basis.
- The whole territory is divided into 19 districts and 1 district will be selected for each operation.
- It is expected to complete one round in about 5 to 6 months.
- Operational area will include 2 shopping centres and 2 streets. All premises selling pre-packaged food within the area will be covered.
- One senior HI(FL) is assigned as the team leader.
- All HIs(FL) will take part in the blitz operation and they will perform label checking duty in pair.
- Duties will focus on label irregularities in particular prepackaged food being sold beyond the ‘used by’ date”.
- Results of operation will be collated and recorded by HI(in-charge) after the operation and submit to SHIs(FL) for scrutiny.
- SHIs(FL) will conduct surprise checking at the target location.
- All supervisory checks will be documented.
- Information on blitz operation will be kept in strict confidential and the access is restricted to need-to-know basis.
- Location and target area will only be released to HIs(FL) in the morning of D-day.

**(G) WORK DONE REPORT**

- (1) HIs(FL) will submit report in prescribed format to SHIs(FL) showing:
  - risk type, name of premises checked, address of premises, no. of labels checked, no. of samples taken, no. of advisory/ warning letter issued, irregularities found, etc.

**(H) SAFE-KEEPING OF FOOD SAMPLES AND EXHIBITS**

**(I) Sample / Exhibit Room**

- (1) A room with locking device is reserved for safe-keeping of samples and exhibits.
- (2) The key of the room is kept by SHIs(FL).
- (3) A Key-Register for the movement of the room key is kept by SHIs(FL).
- (4) HIs(FL) have to make an entry onto the key-register stating the purpose whenever they take the room key. SHIs(FL) will make endorsement on the Key-Register ensuring that the opening of the room is on operational need.
- (5) Inside the Sample/Exhibit Room, each HI(FL) is allocated with 1 cabinet with locking device for storage of food samples and exhibits.
- (6) Currently, there are 4 freezers with locking device shared by 10 HIs(FL).

Note: 6 additional freezers will be purchased so that each HI(FL) will be allocated with 1 freezer individually.

**(II) Register for Food Samples and Exhibits**

- (1) Each HI(FL) is required to keep an updated Register for samples taken in prescribed format.
- (2) SHIs(FL) will conduct surprise check on the Register against samples/ exhibits stored inside the Sample/Exhibit Room.
- (3) All supervisory checks will be recorded on the Register.
- (4) HIs(FL) are required to seek approval of SHIs(FL) to close the sample records.
- (5) Obsolete sample records will be kept and disposed of according to normal office practice.



**(I) DISPOSAL OF SAMPLES AND EXHIBITS**

- (1) Each HI(FL) is required to dispose obsolete samples/exhibits on a quarterly basis.
- (2) Apart from updating his/her own Register for samples/exhibits, he/she is required to prepare a list of samples/exhibits to be disposed of for SHIs(FL) checking and endorsement.
- (3) The disposal list will be recorded for future inspection by senior officers.
- (4) CHI(FL) will conduct quarterly checks to ensure proper disposal of samples/exhibits.
- (5) Procedures for disposal of food samples /exhibits:
  - (i) remove all the packaging materials and labels (including food labels marked by CFS)
  - (ii) all food samples and exhibits will be packed inside garbage bag.
  - (iii) liaise with Cleansing Section of Central/Western District Office to arrange for final disposal of food samples and exhibits. (Schedule of refuse collection vehicle and location of refuse collection point, etc.).
  - (iv) 2 HIs(FL) will escort the samples and exhibits during the way from FLU to refuse collection point.
  - (v) Chloride of lime will be applied onto to the food samples and exhibits before loading onto the refuse collection vehicle inside the refuse collection point.

**(J) ENFORCEMENT ACTION AGAINST FOOD LABEL IRREGULARITIES (EXCLUDING NUTRIENT LABELLING MATTER)**

During checking of the labels of prepackaged food on sale in the local market by HIs(FL), if any irregularity is found, a case file should be opened for follow-up action as follows:-

**(1) Non-serious Cases**

Informal sample must be purchased and a warning letter/advisory letter shall be issued to the vendor/distributor/importer drawing their attention to the contravention of relevant legislation.

In the warning letter, the parties concerned shall be asked to rectify the irregularity within a specified period of time (normally not more than four weeks). If the warning letter is not complied with, follow-up enforcement action including taking a formal sample followed by prosecution should be taken. The following irregularities warrant the issue of warning letter:

- (i) Incomplete or inappropriate food name (e.g. absence of specific indication, e.g. powdered, dried, frozen, concentrated, etc.).
- (ii) Ingredients not listed in descending order.
- (iii) Improper indication of ingredients (e.g. use of “or” or “and/or”) including allergens.
- (iv) Food additives not properly listed, e.g. functional class, specific name or INS no. missing or incorrect.
- (v) Incomplete manufacturer/packer’s name and address.
- (vi) Provide the distributor/ brand owner’s name and address and the country of origin only without notification of the manufacturer/packer’s information to CFS.
- (vii) Improper indication of net weight/net volume/numerical count (e.g. incorrect unit).
- (viii) No indication of special storage condition or instructions for use, where applicable.
- (ix) Food name and list of ingredients not marked in both English and Chinese where both languages are used on the label.
- (x) Information marked in English and Chinese not consistent to each other.
- (xi) Indication of the ‘Use by’/‘Best before’ date in the format of “Day/month/year”.

Issue of advisory letter will be sufficient for the following irregularities:

- Indication of the ‘Use by’/‘Best before’ date not in prescribed format but not misleading, such as
  - (a) MM/DD/YYYY
  - (b) 日日/月月/年年年年
  - (c) With the word “Date” after ‘Use by’/‘Best before’
  - (d) With the word “在” before “此日期或之前食用” or “此日期前最佳”

**(2) Serious Cases**

In case of serious irregularity which falls within the following criteria, a formal sample followed by prosecution should be taken. If the irregularity still persists, monthly prosecution should be taken.

- (i) Absence of any or all of the following information:
  - (a) Food name
  - (b) List of ingredients
  - (c) 'Use by' / 'Best before' date
  - (d) Manufacturer/packer's name and address or both the country of origin and the distributor/brand owner's name and address
  - (e) Net weight/net volume/numerical count
- (ii) Sale of food beyond 'Use by' date.
- (iii) False or misleading information (e.g. false food name).
- (iv) Alter the label without authorization.
- (v) No declaration of the actual or percentage amount of the ingredient with special emphasis on its presence or low content.
- (vi) Blank label.
- (vii) All information printed in foreign language(s) only.
- (viii) Indication of the 'Use by'/'Best before' date by other wordings, such as:
  - (a) Expiry date or expired date
  - (b) Sell-by date
  - (c) 賞味期限

**(K) FOLLOW-UP ACTION ON WARNING LETTERS**

- (1) HIs(FL) will visit the food outlet upon expiry of the warning letter to check for compliance.
- (2) If the non-compliance persists, necessary follow-up action will be taken.
- (3) If the irregularity has been rectified (i.e. the label is revised), a photo of the revised food label will be taken for record. Follow-up action is then completed.
- (4) If the food item is no longer displayed for sale, 3 subsequent inspections will be conducted before closure of the case.
- (5) The number of subsequent inspections and the time frame are not fixed

and may vary from case to case.

- (6) HIs(FL) have to obtain the approval from SHIs(FL) before closure of a case.

**(L) FOLLOW-UP ACTION ON PROSECUTION CASES**

- (1) Within four working days after the discovery of a serious irregularity/non-compliance of warning letter, HI(FL) will create a record in the Summons Tracking Facility System (STFS) and prepare a prosecution case file for the case.
- (2) E-mail to the concerned district office and inform of the prosecution action and request for the following information for the preparation of summons:
  - (a) Name of licensee (in English & Chinese);
  - (b) Shop sign and address of the premises (in English & Chinese);
  - (c) Size of the premises;
  - (d) All previous convictions (Date of Offence, Nature of Offence, Law Breached, Name of Defendant, Date of Conviction, Fine Imposed, Case No.);
  - (e) Type of licence;
  - (f) Copy of B.R.C.; and
  - (g) Copy of the layout plan indicating the licensed portion.
- (3) The reply from concerned district office will be properly documented in the summons paper.
- (4) If the licensee/proprietor of the premises is convicted of the said offence, a prescribed number of demerit points will be registered against their Licence, according to the “Procedural Guide for Demerit Points System” (HY-253).
- (5) After the result of prosecution has been received, HIs(FL) will inform the concerned district of the result of prosecution in respect of the licensed premises for their information and their action deemed necessary (Demit Point System).
- (6) If the food outlet is not a licensed premises, HIs(FL) will search from the main prosecution record in Food Labelling Unit to check whether it has previous convictions and record it in the summons file. He will also indicate if any warning letter has ever been issued to the food outlet concerned in the summons paper.
- (7) The result of prosecution will be properly recorded in the main prosecution record in Food Labelling Unit.

- (8) Subsequent follow up action will be taken by HIs(FL).
- (9) HIs(FL) have to obtain the approval from SHIs(FL) before closure of a case.

**(M) FOLLOW UP ACTIONS ON FOOD SAMPLES WITH UNSATISFACTORY TEST RESULTS**

**(I) Unsatisfactory results (chemical analysis), e.g. discrepancy between declared value on packaging and analysis result)**

**(a) General Labelling Issues**

- (1) Issue warning letter to vendor / distributor / manufacturer (as appropriate) upon confirmation of the unsatisfactory result. They are required to rectify the irregularity within a specified period of time (normally not more than four weeks).
- (2) If the warning letter is not complied with, subsequent follow-up action will be taken.

**(b) Nutrition Labelling Issues**

- (1) Issue a letter to the trader requiring him/her to give an explanation within 21 days.
- (2) If the explanation given by the trader is found to be unsatisfactory or there is no response from the trader, a warning letter will be issued to the trader who will be required to comply with the legislation within 60 days.
- (3) After the expiry of the 60 days' period, if the irregularity(ies) is/are not rectified or the product in question is not withdrawn from the market, necessary follow-up action will be taken.

**(II) Unsatisfactory results (chemical analysis) e.g. food additives exceeding legal standard.**

- (1) Once the unsatisfactory result of the food sample is confirmed, the HI(FL) shall report the case to SHI(FL). SHI(FL) shall keep CHI(FL) informed of the unsatisfactory results so that appropriate action will be taken.
- (2) HI(FL) has to submit alerting report through e-mail to SHI(FL) if the unsatisfactory result is confirmed. SHI(FL) will vet the report and

submit it through e-mail to CHI(FL) and Supt(FS)2.

- (3) A warning letter, signed by SHI(FL), shall be issued within 3 working days upon confirmation of the unsatisfactory result to notify the vendor / distributor / manufacturer of the analysis result. The retailer should be required to immediately stop the sale of the affected product and remove the product in question for disposal or for destruction under the supervision of HI(FL) in case of voluntary surrender.
- (4) HIs(FL) shall keep the food concerned under close surveillance until it has been totally withdrawn from the market. Necessary follow-up action will be taken as and when required.
- (5) Trace source of supply to stop further sale by requesting for source list and distribution list and investigate into suppliers and retailers on the list, where appropriate.

**(N) FOOD ALERT & RECALL PROCEDURE**

**(I) Unsatisfactory results (chemical analysis) e.g. food additives exceeding legal standard**

- follow-up action to be taken according to paragraph (L)(II) above.

**(II) Daily summary of food recalls due to allergens (incidents that are reported by food authorities and media agencies outside Hong Kong and may have local implications) which is referred by Risk Management Section, Food Surveillance and Control Division, Centre for Food Safety**

- (1) In case the food incident involves allergens, CHI(FL) will immediately notify SHI(FL) and HI(FL) the case. SHI(FL) will give the instruction to the HI(FL) for follow-up action.
- (2) HI(FL) shall conduct urgent sale check for the alleged food item at the local retail outlets to confirm whether the alleged food item is available for sale in Hong Kong local market.

- (3) If the allergic food is confirmed on sale in Hong Kong, HI(FL) shall alert the major retailers and local distributors if known about the food incident case and advise the vendor / distributor / manufacturer to cease the sale until further notice.
- (4) If the vendor/ distributor / manufacturer do not cease the sale, HI(FL) should report the case in detail to the SHI(FL) for onwards transmission to senior officers to seek directive. Decision will be made whether Section 78B of Cap. 132 will be executed.

**Remarks: This guideline is a general working procedures on time frames and follow-up actions on food samples with unsatisfactory test results. Please note that special procedure may apply on a case-by-case basis.**

**(O) MONITORING OF E-TRADERS (INTERNET SHOPS)**

- (1) A list of e-traders with website, contact e-mail address & telephone number, address of premises and major type of food sold are being kept in the office which will be continually updated.
- (2) A pre-scheduled online surfing and site visit to retail outlets of internet shops are arranged on a monthly basis.
- (3) The first Thursday of each month, the HI(FL) who is on office stand-by is required to conduct online surfing of e-traders and update the current information of the e-traders list on that day.
- (4) The office stand-by HI(FL) will also prepare a target list of e-trader upon the instruction of SHIs(FL) for site visit on the next Wednesday afternoon and submit result of operation and surfing finding to SHIs(FL) for scrutiny.
- (5) The second Wednesday afternoon (date of Blitz operation) of each month, all HIs(FL) will conduct site visits to the internet shops for label checking according to the target list during the Blitz operation.
- (6) Health education, delivery of Labelling pamphlet and taking samples for chemical analysis should also be made during the operation if necessary.

**(P) RECORD KEEPING**

All HIs(FL) have to keep the following records:

- Label checking record
- Register for samples / exhibits
- Samples/exhibits disposal record
- Prosecution record
- Complaint record
- Notification record

**(Q) SUPERVISORY CHECKS**

**(I) SHIs(FL)**

- (1) SHIs(FL) are required to conduct supervisory checks to all their subordinates every two months.
- (2) Supervisory checks include:
  - site checking on the performance of HIs(FL),
  - re-inspections of label checking made by HIs(FL),
  - random label checking at retail outlets,
  - spot checks on prosecution cases/warning letters cases/enquiry letters.
  - surprise checks on blitz operations.
- (3) All supervisory checks will be documented.

**(II) CHI(FL) & Supt(FS)2**

- (1) CHI(FL) & Supt(FS)2 will conduct surprise checks on the work of FLU on bi-monthly and quarterly interval respectively.
- (2) Surprise checks include:
  - all registers kept in FLU,
  - blitz operations,
  - random label checking at retail outlets,
  - spot checks on prosecution cases and warning letters cases,
- (3) All supervisory checks will be documented.

Food Labelling Unit  
Food Surveillance & Complaint Section  
Centre For Food Safety  
January 2011  
(Revised on April 2011)



## Workdone Report for Label Checking / Sampling at Retail Outlets

**Officer:** \_\_\_\_\_

**Month & Year:** \_\_\_\_\_

**Food Category:-**

- |                    |                         |
|--------------------|-------------------------|
| A. Bakery Products | F. Aquatic Products     |
| B. Candies         | G. Meat & Meat Products |
| C. Canned Food     | H. Preserved Fruit      |
| D. Dairy Products  | I. Sauces               |
| E. Drinks          | J. Misc.                |

**Group:-**

- |                      |                               |                             |                                   |
|----------------------|-------------------------------|-----------------------------|-----------------------------------|
| 1. Bakery Shop       | 6. Ethnic Shop                | 11. Market                  | 16. Shopping Centre               |
| 2. Bazaar            | 7. Food Factory (FF)          | 12. Medicinal Shop          | 17. Siu Mei & Lo Mei Shop (SM&LM) |
| 3. Cosmetics Shop    | 8. Fresh Provision Shop (FPS) | 13. Other Retails           | 18. Snack Shop                    |
| 4. Convenience Store | 9. Grocery                    | 14. Restaurant (eg. GR/LRR) | 19. Supermarket                   |
| 5. Department Store  | 10. Health Shop               | 15. School                  | 20. Vegetables/Fruit Shop         |

**Irregularities Detected:-**

- I. Food Name
- II. List of Ingredients
- III. Durability
- IV. Storage Condition / Instruction for Use

- V. Name & Address of Manufacturer / Packer
- VI. Net Weight / Volume or Count
- VII. Nutrition Labelling and Claim
- VIII. Others

**Action Taken:-**

- Verbal warning (VW)
- Warning Letter (WL)
- Enquiry Letter (EL)
- Advisory Letter (AL)
- Legal Action (LA)

Serial No.	Date	Risk (H/M/L)	Group	Shop Sign	Address	Sampling Y/N (If "Y", Formal/ Informal Sample)	Brand Name, Food Name, Flavour (Supplementary Information e.g. Net Weight/Volume)	Food Category	Irregularities for food label		Previous irregularities on food label		
									Irregularities detected	Action taken	Summons (Y/N)	Complaint (Y/N)	Warning / Enquiry / Advisory Letter (Y/N)