

**For information
on 8 May 2012**

LegCo Panel on Food Safety and Environmental Hygiene

Implementation of the Nutrition Labelling Scheme

Purpose

This paper briefs Members on the implementation of the Nutrition Labelling Scheme (the Scheme) which came into effect on 1 July 2010.

Background

2. The Food and Drugs (Composition and Labelling) (Amendment: Requirements for Nutrition Labelling and Nutrition Claim) Regulation 2008 (the Amendment Regulation), which introduces the Scheme for prepackaged food, has come into force since 1 July 2010. The Scheme aims to (a) assist consumers in making informed food choices; (b) encourage food manufacturers to apply sound nutrition principles in the formulation of foods; and (c) regulate misleading or deceptive labels and claims. The Scheme covers nutrition labelling¹ and nutrition claims (which includes nutrient content claim², nutrient comparative claim³ and nutrient function claim⁴).

¹ Nutrition labelling refers to the listing of the nutrient content of a food in a standardised manner. When nutrition labelling is applied, energy content and the seven core nutrients (protein, carbohydrates, total fat, saturated fat, trans fat, sodium and sugars) or what is commonly known as “1+7”, and claimed nutrients are required to be affixed on the nutrition label.

² A nutrient content claim describes the energy value or the level of a nutrient contained in a food, e.g. “High calcium”; “Low fat”; “Sugar-free”.

³ A nutrient comparative claim compares the energy value or the nutrient levels of two or more different versions of the same food or similar food, e.g. “Reduced fat – 25% less than the regular product of the same brand”.

⁴ A nutrient function claim 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”.

3. The Amendment Regulation provides a Small Volume Exemption (SVE) scheme for prepackaged food with annual sales volume not exceeding 30 000 units which does not carry nutrition claims. In light of operational experience, the Centre for Food Safety (CFS) is reviewing the fees chargeable under the SVE scheme. In addition, CFS has assessed the impact of the Scheme on the food choice through surveys conducted by independent consultants.

4. Since the passage of the Amendment Regulation by the Legislative Council in May 2008, CFS has been carrying out a variety of publicity and education programmes to enhance public understanding of the Scheme. Following the three-year Publicity and Education Campaign which ended in June 2011, CFS launched a two-year enhancement programme on nutrition labelling in July 2011 to sustain the effort in motivating behavioural changes among consumers in the use of nutrition information on labels.

5. The Scheme requires that nutrition labels be legible so that consumers can make informed healthy choices. However, no specific legibility requirement has been stipulated in the Amendment Regulation. To promote good practice in providing legible information on food labels (including nutrition labels), CFS has developed a set of trade guidelines on preparation of legible food labels.

Compliance with the Scheme

6. As at 13 April 2012, CFS has checked the nutrition label of 19 340 prepackaged food products with 188 found not complying with the Scheme. The overall compliance rate is 99.03%. Of the 188 non-compliant cases, 121 were identified by visual checking for not complying with the statutory “1+7” labelling requirements and 67 by chemical analysis on the inaccuracy of the nutrition labels and nutrition claims. Details are at **Annex I**.

7. In the first year of implementing the Scheme, upon detection of irregularities such as incomplete nutrition label and discrepancy between the stated nutrient content on the nutrition label and test results, CFS would first issue a letter to the retailer / manufacturer / importer concerned requiring an explanation within 21 days. If the explanation was not accepted by CFS, a warning letter would be issued requiring actions to comply with the requirements of the Scheme within 60 days. For traders who failed to do so, CFS would initiate prosecution.

8. Since July 2011, CFS has tightened up its enforcement strategy, taking into account the operational experience gained during the first year of implementing the Scheme. Where irregularities such as incomplete nutrition label are identified, CFS will issue a warning letter to the retailer / manufacturer / importer concerned requiring actions to comply with the requirements of the Scheme within 60 days. For discrepancy between the actual nutrient content based on test result and the stated value on the nutrition label, CFS will issue a letter to the retailer / manufacturer / importer concerned requiring an explanation within 21 days. If the explanation is not accepted by CFS, a warning letter requiring actions to comply with the requirements of the Scheme within 39 days will then be issued. In case the food item with detected discrepancy remains on sale, CFS will initiate prosecution.

9. CFS has further reviewed the enforcement strategy for festive food, for example, rice dumpling. Starting in June 2012, if irregularities of festive food such as incomplete nutrition label are identified, CFS will give verbal warnings to the trader concerned, requiring action to rectify the irregularities within 7 days. If the irregularities persist, a warning letter will be issued to the trader. For traders who fail to comply within 7 days after the issue of the warning letters, CFS will initiate prosecution. The reason for the shorter time allowed for compliance is that the window for selling such festive food may be as short as 4 to 6 weeks.

10. So far, traders have been co-operative. They have either withdrawn the product concerned from the shelf or rectified the nutrition label according to the statutory requirements of the Scheme. At this stage, no prosecution has been made.

A risk-based enforcement approach

11. CFS has adopted a risk-based enforcement approach as recommended in Independent Commission Against Corruption (ICAC)'s assignment report on enforcement of food labelling requirements since 1 April 2011, targeting at high-risk retail outlets⁵. CFS is building up a database of 2 300 retail outlets to facilitate inspection, surveillance, enforcement, risk management and public education work. Internal

⁵ High-risk retail outlets include those poorly managed outlets, often of a small scale, selling mainly prepackaged food with nutrition claims (e.g. health food), or with unsatisfactory past records (e.g. premises with labelling irregularities detected previously).

guidelines for blitz operations have been updated accordingly, setting out the risk-based inspection requirements and details of follow-up actions if non-compliance cases are detected, so that any breaches identified are rectified and will not persist. With effect from March 2012, products with unsatisfactory testing results are announced in the monthly Report on Nutrition Labelling Testing Results in CFS's website.

SVE Scheme

12. Applications for SVE have commenced since 1 September 2009. The SVE scheme has been well utilized by the trade. As at 13 April 2012, there were 45 427 SVE applications (since 1 September 2009), of which 41 812 were approved and 2 057 were rejected, mostly due to the presence of nutrition claims⁶. The rest have either been withdrawn by the applicants or are being processed. In terms of country of origin, Japan (49%), USA (9%) and UK (7%) took up 65% of the applications approved. Details are at **Annex II**. Currently there are 20 266 SVE products with valid exemption in the market.

Review of SVE Fees

13. The fees for SVE applications are charged on a full-cost recovery basis which include staff cost, departmental expenses, accommodation cost and administrative cost. As stipulated in subsections 1(3) and 2(3) of Part 2 of Schedule 6 to the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), the SVE fee for new and renewal application is \$345 and \$335 respectively.

14. CFS is reviewing the SVE fees. As the average processing time of an online application is less than that of a paper application (for both new and renewal application), CFS is considering the introduction of a reduced fee for online application, which will encourage the trade to submit their applications through electronic means. In addition, the use of online application will save paper and is in line with the

⁶ Regulation 4B(4) of the Food and Drugs (Composition and Labelling) Regulations (Cap.132W) stipulates that if any nutrition claim is made on the label of, or in any advertisement for, any item in respect of which an exemption has been granted under Part 2 of Schedule 6 (i.e. the SVE), prepackaged food shall be marked or labelled with its energy value and nutrient content in compliance with Part 1 of Schedule 5 of Cap.132W, i.e the nutrition labelling requirement. Application for SVE in respect of a prepackaged food (which seeks to exempt the food from the nutrition labelling requirement) with nutrition claim will therefore be rejected.

Administration's policy on environmental protection. CFS aims to complete the review in the second half of 2012.

Impact on Food Choice

15. There has been concern that the Scheme may limit the food choice of the public, either by reducing the number of prepackaged food products available in the local market or by hindering the introduction of new products into Hong Kong. To assess the impact of the Scheme, CFS has commissioned two independent consultants to conduct two series of surveys since late 2009, namely the Market Survey and the Food Expo Survey.

Market Survey

16. CFS has commissioned the Market Survey to find out the quantity of different types of prepackaged food products available in various retail outlets, e.g. supermarkets, specialty shops (including shops specialised in health foods, organic products and snacks), and ethnic shops (including Filipino, Indonesian, Indian, Thai and Nepalese / Pakistani), before and after the implementation of the Scheme. The first and second (pre-implementation) surveys were conducted from September 2009 to January 2010 and March to April 2010 respectively, while the third (post-implementation) one was conducted from March to April 2011.

17. According to the results of the first and second surveys, there were around 73 000 prepackaged food products in the market that would be regulated by the Amendment Regulation before its implementation. After the implementation of the Scheme, there was actually a slight increase to around 78 000 prepackaged food products as revealed by the third survey.

18. The Market Survey suggested that there was no significant impact on the food choice in supermarkets (two pre-implementation surveys: 49 000 and 53 000 products; post-implementation survey: 49 000 products). Although the number of prepackaged food products in ethnic shops was found to have reduced after the commencement of the Scheme (two pre-implementation surveys: 4 900 and 5 000 products; post-implementation survey: 3 700 products), there was an increase in the number of prepackaged food products sold in specialty shops (two pre-implementation surveys: 19 000 and 17 000 products; post-implementation survey: 25 000 products). All in all, the survey

showed that the implementation of the Scheme did not have any apparent impact on the total number of prepackaged food products in the market.

Food Expo Survey

19. The annual Food Expo held at the Hong Kong Convention and Exhibition Centre (HKCEC) by the Hong Kong Trade Development Council has been widely accepted to be a testing ground for introducing new-to-market prepackaged food products into Hong Kong. CFS has thus commissioned an independent consultant to conduct a survey in the Food Expos of both 2010 and 2011. The purpose is to assess the impact of the Scheme on new-to-market prepackaged food products introduced via Food Expo by comparing the data collected in Food Expo 2011 with that of the Food Expo 2010 as the baseline.

20. The survey covered 560 exhibitors in Food Expo 2011, mainly from Hong Kong (44%), Mainland (30%), Japan (17%) and Korea (5%). Of the exhibitors who participated in both Expos (291 exhibitors), 74.2% indicated that the number of new-to-market products they brought in 2011 was no less than that in 2010. For the remaining 25.8% who brought in fewer new-to-market products in 2011, the majority of them expressed that the decline was mainly due to 'no new products' (29%); 'satisfying market demands' (17%) and 'business reasons, such as scale-down' (16%). Only less than 3% of them attributed the decline to the Scheme. In addition, there was a slight decrease in the new-to-market prepackaged food products for which some modification of the labels had been carried out because of the Scheme or exemption had been granted under the SVE (about 51% in 2010 and 41% in 2011). This indicated that traders were able to source new products complying with the Scheme more easily in the market, thus reducing the necessary modifications required and the related compliance cost. It was also noted that the SVE-related expenses were shared among different parties of the trade, with the exporters (non-Hong Kong-based traders) taking up a relatively larger proportion in both years (41% in 2011 and 35% in 2010).

21. The results indicated that the introduction of the Scheme did not have any significant impact on the new-to-market prepackaged food products being introduced via Food Expo. Factors such as changes in marketing strategies and business objectives of some exhibitors appeared to have a more significant impact on the number of new-to-market prepackaged food products that were sold or promoted in the Food Expo 2011.

Publicity and Education

22. To reap the benefits of the Scheme, it is important to educate the public on how to make use of the information in nutrition labels to make healthier food choices. To this end, CFS conducted a three-year Publicity and Education Campaign from June 2008 to June 2011. According to a survey conducted by the Bauhinia Foundation Research Centre in June 2011 which interviewed over 1 000 citizens, nearly 80% agreed that the implementation of the Scheme assisted them in making healthier food choices. Over half of the respondents considered that the Scheme has enhanced their confidence in the nutrition content and nutrition claims on the prepackaged food products.

23. Behavioural changes require long-term efforts. To sustain the educational effort in motivating behavioural changes in the use of nutrition labelling, CFS has carried out a two-year enhancement programme on nutrition labelling targeting youths and general public since July 2011 to consolidate the efforts in motivating behavioural changes among the public at large.

24. To promote the wider application of nutrition information by consumers, CFS launched a mobile phone application (the App) “Nutrition Calculator” (“NuCal”)⁷ in October 2011. The App is popular with more than 38 900 downloads and ranks among the most popular apps in the “Health and Fitness” category. With NuCal, one can set up a personal database for recording nutrition information of their favourite prepackaged food items and work out the amount to consume without exceeding the upper limit for the daily intake of the nutrients. An upgraded version of the App was launched in April 2012 with a new feature to enable users to exchange information on food items in their personal database via Bluetooth. CFS will continue to sustain its publicity and public educational efforts in collaboration with the education sector and community organisations to promote the use of information on nutrition labels among different target groups.

⁷ Details of the App are available at CFS’s website (www.cfs.gov.hk). The App can be downloaded at the App Store by searching any of the following keywords: nucal, cfs or nutrition calculator.

Trade guidelines on preparation of legible food label

25. At present, the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W) require the following information to be legibly marked on the food label of all prepackaged food, unless otherwise exempted –

- (i) name of the food;
- (ii) list of ingredients (including ingredients, allergenic substances and additives);
- (iii) indication of durability;
- (iv) special conditions for storage or instruction for use;
- (v) count, weight or volume;
- (vi) name and address of manufacturer or packer; and
- (vii) nutrition label.

26. Without limiting the design of the food label of the products, traders are required to note the legal requirement on legibility and ensure all the required information is shown clearly in the food labels. A set of “Trade guidelines on preparation of legible food label” (Guidelines) has been drafted to provide principles and examples of legible food labels for trade’s reference. The draft Guidelines were uploaded to CFS’s website for consultation in December 2011 and discussed with the trade during meetings of the Working Group on Nutrition Labelling and Trade Consultation Forums. The finalised Guidelines (**Annex III**) have taken into account international practice, legal requirements as well as feedback from the trade and consumer groups, including the Consumer Council and CFS’ Consumer Liaison Group. The Guidelines cover what constitute acceptable font size, good contrast and sufficient spacing. Besides, the Guidelines also highlight other relevant factors in enhancing the clarity of words, such as appropriate font type, suitable printing technology and non-reflective printing surface.

27. Traders are strongly recommended to observe the three elements of legible food labels (i.e. suitable font size, good contrast and enough spacing) when preparing food labels for their prepackaged products in order to comply with the legibility requirement of the food labelling regulation. CFS will make reference to the Guidelines in assessing the legibility of nutrition label of the prepackaged products during their surveillance. CFS will take appropriate enforcement action if prepackaged food is not legibly marked or labelled under the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W).

Advice Sought

28. Members are invited to note the progress of implementation of the Scheme and the “Trade guidelines on preparation of legible food label”.

**Food and Health Bureau
Food and Environmental Hygiene Department
Centre for Food Safety**

April 2012

Annex I**Detailed breakdown of 188 non-compliant cases**

Nature of non-compliance	No. of cases for the year of 2010 (1.7.2010 - 31.12.2010)	No. of Cases (2011)	No. of Cases (2012) as at 13.4.2012
No or incomplete “1+7” nutrition label	43	24	3
Inappropriate nutrition label format	4	3	0
Inappropriate nutrient claim (nutrient content claim and nutrient function claim)	7	11	0
Inappropriate language	12	3	2
Involving more than one type of irregularity (e.g. incomplete “1+7” nutrition, inappropriate nutrition label format)	0	7	2
Discrepancy on declared nutrient value confirmed after chemical analysis	30	29	8
Sub Total	96	77	15
Total	188		

**Detailed breakdown of SVE applications
(as at 13 April 2012)**

No. of applications	Position as at 13.4.2012
Received (a)	45 427
Approved (b)	41 812
Rejected (c)	2 057*
Withdrawn by the applicant (d)	1 126
Pending (e)= (a) – (b) – (c) – (d)	432

*The breakdown of 2 057 applications rejected is as follows: 1 944 applications were rejected due to the presence of nutrition claims on the package, which make them ineligible under the Amendment Regulation. 27 applications were submitted by overseas traders. We have asked the applicants to contact the local importers so that the latter could make the application direct. The remaining 86 applications were rejected as they were either Chinese medicines or drugs and were not regarded as “food”.

Trade Guidelines on Preparation of Legible Food Label



Purpose

Food label is an important channel of communication between manufacturers and consumers on information about a food product. A legible food label with essential information of the product appropriately marked would assist consumers make informed choices. To promote good practice, this set of guidelines aims at assisting the trade to provide legible information on food label. Officers will also make reference to the guidelines in the interpretation of legibility requirements of food label as stipulated in the Food and Drugs (Composition and Labelling) Regulations (Cap. 132 W).

Background

2. At present, Cap. 132 W requires the following information to be legibly marked on the food label of all prepackaged food, unless otherwise exempted-

- (i) Name of the food;
- (ii) List of ingredients (including ingredients, allergenic substances and additives);
- (iii) Indication of durability;
- (iv) Special conditions for storage or instruction for use;
- (v) Count, weight or volume;
- (vi) Name and address of manufacturer or packer; and
- (vii) Nutrition label.

3. The trade has liberty to design the food label of their products. However, when preparing food labels, apart from putting efforts on designs which could attract attention from their potential buyers, it is also important for traders to note the legal requirement on legibility and to show the required information clearly. When a food label is not properly designed, consumers may have difficulty reading the labels for information they required. This set of guidelines provides principles and examples of legible food labels for traders' reference.

Elements of legible food label

4. A number of factors can affect the legibility. The obvious ones include: font size, contrast between the background and the text, and the spacing between the lines. In principle, the font size used in the food label should be as large as possible to facilitate the consumers to read the labels easily.

5. The following provides specific recommendations on the key elements for a reasonably legible food label:

(i) **Suitable font size**

In general, a font size of at least 1.2 mm x-height* for English letter and Chinese characters in comparable size is recommended (see example 1). However, the recommended font size may not be always practically feasible. Examples of these situations are some products with limited package size (e.g. package of total surface area less than 400cm²), some products required to present information in addition to local laws such as those required by international standards and guidelines, infant formula and related food products that needed to provide detailed nutrition information and instruction for consumer use, imported food products that have packaging with limited spacing for affixing label with larger font size, or when the information is presented in more than one language. In any case, a minimum font size of at least 0.8 mm x-height for English letters and 1.8 mm total height for Chinese characters should be provided (see example 2).

* *x-height* is defined as the height of small character *x* as illustrated below:



(ii) **Good contrast**

Whenever practical, all black or single dark colour type, printed on a white or other single light colour contrasting background is recommended. It is also acceptable to do it vice versa as long as the words are clearly shown. In addition, for products packed in transparent containers, it is recommended that the food label area should come with a non-transparent contrasting background, so that the clarity of the label would not be affected by the colour or appearance of the food.

(iii) **Enough spacing**

Words and characters should be displayed in such a manner that they never touch each other or the lines and borders surrounding or separating the information, if any.

6. Apart from the above elements, it is also noted that the clarity of words may be enhanced by other relevant factors such as appropriate font type, suitable printing technology and non-reflective printing surface.

Good examples of legible food labels (Examples 1 – 3)

Example 1:

At least 1.2 mm x-height for English letter and Chinese characters in comparable font size (general recommendation)

洋蔥湯 ONION SOUP 此日期前最佳: 日 月 年 DD MM YY	
淨重: 300 克 Net weight: 300g	Best before: 15 12 2012
成份: 水、洋蔥、粟米油、鹽、乳清蛋白質(奶類製品)、增味劑 (621)	
用法: 將一罐清水拌入湯內, 煲滾後方可飲用	
製造商/包裝商: ABC 有限公司, 香港健康路 123 號	
Ingredients: Water, onion, corn oil, salt, whey protein (milk) flavour enhancer (621) Manufacturer/Packer: ABC Ltd. 123 Healthy Rd., Hong Kong	
Directions: Blend soup with one can of water. Boil before serving.	
Nutrition Information 營養資料 Per 100g / 每 100 克	
Energy 能量 77 kcal/千卡	Protein 蛋白質 2.2 g/克
Total fat 總脂肪 3.0 g/克	Carbohydrates 碳水化合物 10.4g/克
-Saturated fat 飽和脂肪 0.8 g/克	- Sugars 糖 3.6 g/克
-Trans fat 反式脂肪 0 g/克	Sodium 鈉 637mg/毫克

Example 2:

Black type on white background, English letter in x-height 0.8mm, Chinese character in 1.8mm total height

洋蔥湯 ONION SOUP 此日期前最佳: 日 月 年 DD MM YY	
淨重: 300 克 Net weight: 300g	Best before: 15 12 2012
成份: 水、洋蔥、粟米油、鹽、乳清蛋白質(奶類製品)、增味劑 (621)	
用法: 將一罐清水拌入湯內, 煲滾後方可飲用	
製造商/包裝商: ABC 有限公司, 香港健康路 123 號	
Ingredients: Water, onion, corn oil, salt, whey protein (milk) flavour enhancer (621) Manufacturer/Packer: ABC Ltd. 123 Healthy Rd., Hong Kong	
Directions: Blend soup with one can of water. Boil before serving.	
Nutrition Information 營養資料 Per 100g / 每 100 克	
Energy 能量 77kcal/千卡	Protein 蛋白質 2.2 g/克
Total fat 總脂肪 3.0g/克	Carbohydrates 碳水化合物 10.4g/克
-Saturated fat 飽和脂肪 0.8 g/克	- Sugars 糖 3.6g/克
-Trans fat 反式脂肪 0 g/克	Sodium 鈉 637 mg/毫克

Example 3:

Single dark colour type on light colour contrasting background

洋蔥湯 ONION SOUP 此日期前最佳: 日 月 年			
Best before: DD MM YY			
淨重: 300 克 / Net weight: 300g 15 12 2012			
成份: 水、洋蔥、粟米油、鹽、乳清蛋白質(奶類製品)、增味劑 (621)			
用法: 將一罐清水拌入湯內, 煲滾後方可飲用 製造商/包裝商: ABC 有限公司, 香港健康路 123 號			
Ingredients: Water, onion, corn oil, salt, whey protein (milk flavour enhancer (621) Directions: Blend soup with one can of water. Boil before serving. Manufacturer/Packer: ABC Ltd, 123 Healthy Rd., Hong Kong			
Nutrition Information 營養資料 Per 100g / 每 100 克			
Energy 能量	77kcal/千卡	Protein 蛋白質	2.2 g / 克
Total fat 總脂肪	3.0g/克	Carbohydrates 碳水化合物	10.4g/克
-Saturated fat 飽和脂肪	0.8 g / 克	- Sugars 糖	3.6 g / 克
-Trans fat 反式脂肪	0 g / 克	Sodium 鈉	637 mg / 毫克

Examples of illegible food labels (Examples 4 – 7)

Example 4:

Words could not be clearly shown on patterned background

洋蔥湯 ONION SOUP	
成份: 水、洋蔥、粟米油、鹽、乳清蛋白質(奶類製品)、增味劑 (621)	
Ingredients: Water, onion, corn oil, salt, whey protein(milk product), flavour enhancer (621)	
用法: 將一罐清水拌入湯內, 煲滾後方可飲用	
Directions: Blend soup with one can of water. Boil before serving.	
製造商/包裝商: ABC 有限公司, 香港健康路 123 號	
Manufacturer/Packer: ABC Ltd, 123 Healthy Road, Hong Kong	
Nutrition Information 營養資料	
Per 100g / 每 100 克	
Energy 能量	77 kcal/千卡
Protein 蛋白質	2.2 g / 克
Total fat 總脂肪	3.0 g / 克
- Saturated fat 飽和脂肪	0.8 g / 克
- Trans fat 反式脂肪	0 g / 克
Carbohydrates 碳水化合物	10.4 g / 克
- Sugars 糖	3.6 g / 克
Sodium 鈉	637 mg / 毫克
淨重: 300 克	
Net weight: 300g	
15 12 2011	

Example 5:

Lack of contrast between text and dark colour background

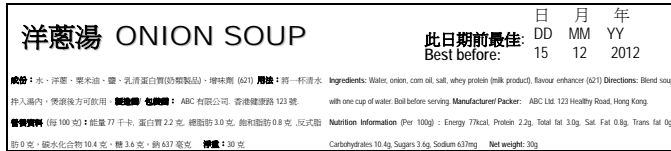
洋蔥湯 ONION SOUP	
成份：水、洋蔥、粟米油、鹽、乳清蛋白質(奶類製品)、 增味劑 (621)	營養資料 Nutrition Information
	每 100 克/ Per 100g
Ingredients: Water, onion, corn oil, salt, whey protein (milk product), flavour enhancer (621)	能量/ Energy 77 千卡/ kcal
	蛋白質/ Protein 2.2 克/ g
用法：將一罐清水拌入湯內，煲滾後方可飲用。 Directions: Blend soup with one can of water. Boil before serving.	總脂肪/ Total fat 3.0 克/ g
	- 飽和脂肪/ Saturated fat 0.8 克/ g
製造商/包裝商：ABC 有限公司。香港健康路 123 號 Manufacturer/Packer: ABC Ltd. 123 Healthy Road, Hong Kong	- 反式脂肪/ Trans fat 0 克/ g
	碳水化合物/ Carbohydrates 10.4 克/ g
此日期前最佳：日 月 年 Best before: DD MM YY 15 12 2011	- 糖/ Sugars 3.6 克/ g
	鈉/ Sodium 637 毫克/ mg
	淨重：300 克 Net weight: 300g

Example 6: Light colour type on white background; words are not clearly printed

洋蔥湯 ONION SOUP	
成份：水、洋蔥、粟米油、鹽、乳清蛋白質(奶類製品)、 增味劑 (621)	營養資料 Nutrition Information
	每 100 克/ Per 100g
Ingredients: Water, onion, corn oil, salt, whey protein (milk product), flavour enhancer (621)	能量/ Energy 77 千卡/ kcal
	蛋白質/ Protein 2.2 克/ g
用法：將一罐清水拌入湯內，煲滾後方可飲用。 Directions: Blend soup with one can of water. Boil before serving.	總脂肪/ Total fat 3.0 克/ g
	- 飽和脂肪/ Saturated fat 0.8 克/ g
製造商/包裝商：ABC 有限公司。香港健康路 123 號 Manufacturer/Packer: ABC Ltd. 123 Healthy Road, Hong Kong	- 反式脂肪/ Trans fat 0 克/ g
	碳水化合物/ Carbohydrates 10.4 克/ g
此日期前最佳：日 月 年 Best before: DD MM YY 15 12 2011	- 糖/ Sugars 3.6 克/ g
	鈉/ Sodium 637 毫克/ mg
	淨重：300 克 Net weight: 300g

Example 7:

Type size too small and words are not clearly shown (the smallest type size is much smaller than 0.8mm x-height for English letters and 1.8mm total height for numbers and Chinese characters)



Recommendation

7. Traders should observe the elements of legible food labels and make reference to the above examples when preparing food labels for their prepackaged products in order to comply with the legibility requirement of the food labelling regulation.

Centre for Food Safety
XXX 2012