Labelling of Trans Fat on Nutrition Labels

This paper explains the difference in labelling of trans fat as "0 g" as required by the US and the Hong Kong's nutrition labelling laws.

- 2. Under the Amendment Regulation, the absolute amount of the "core nutrients" (energy, protein, carbohydrates, total fat, saturated fat, trans fat, sodium and sugars) and any claimed nutrients contained in the food have to be provided on the nutrition label (in terms of kilocalorie, kilojoule, gram, milligram or microgram).
- 3. Under the nutrition labelling scheme in Hong Kong, food products containing less than 0.3 g of trans fat per 100 g can be labelled as containing 0 g of trans fat per 100 g in the nutrition panel. In the US system, the corresponding rule is 0.5 g per serving. In other words, the value of trans fat may be declared as "0 g" on the nutrition label of food products sold in the US, as long as the actual amount is within the limit of "0.5 g per serving".
- 4. Under the US system, the serving size varies among different types of food. The differences in the reference amounts for serving sizes vary to a significant extent, e.g. 15 g for mayonnaise spread, 30 g for cookies, 240 ml for milk and 245 g for soup. The limit of "0.5g" for trans fat however applies equally to all serving types. In other words, assuming that there are two pieces of cookies in the 30g-serving (which is labelled as "0 g trans fat"), consumption of five pieces cookies (i.e. 2.5 servings) may already contribute to 1.25 g of trans fat, equivalent to more than 50% of trans fat intake limit for an individual with 2000 kcal daily energy intake, which is 2.2 g.

5. Below are some examples for illustration –

	Reference serving size in US	Could be labelled as "0 g of trans fat" in US if the trans fat content
		is below
(a) Milk	240 ml	0.2 g per 100 ml
(b) Soup	245 g	0.2 g per 100 g
(c) Mayonnaise	15 g	3.3 g per 100 g
(d) Cookies	30 g	1.7 g per 100 g

Under Hong Kong's nutrition labelling scheme, only food with no more than 0.3 g per 100 g of trans fat could be labelled as "0 g" of trans fat. In other words, example (a) (milk) and (b) (soup) above could meet the requirement in Hong Kong while example (c) (mayonnaise) and (d) (cookies) may not.