Trade Guidelines on Preparation of Legible Food Label

製備可閱的食物標籤 業界指引

Centre for Food Safety
食物安全中心

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食物環境衞生署
Food and Environmental Hygiene Department

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Background 背景

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Background 背景

- Legible food label with essential information of the product appropriately marked would assist consumers in making informed choices

- When food label is not properly designed, consumers may have difficulty reading the labels for information they require

- 可閱而適當地標示產品重要訊息的食物標籤，有助消費者作出有依據的選擇

- 如食物標籤的設計欠妥善，消費者難以從標籤獲取所需的資料

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Legal Provision 法例

- The trade can design the food label of their products

- The Food and Drugs (Composition and Labelling) Regulations (Cap. 132W) requires the following information to be legibly marked on food label unless otherwise exempted
  1. Name of the food
  2. List of ingredients (including ingredients, allergenic substances and additives)
  3. Indication of durability
  4. Special conditions for storage or instruction of use
  5. Count, weight or volume
  6. Name and address of manufacturer or packer
  7. Nutrition label

- 法例容許業界為其產品設計食物標籤

- 法例《食物及藥物(成分組合及標籤)規例》(第132W 章)規定，除獲豁免外，須在食物標籤上清楚標示以下各項資料
  1. 食物名稱
  2. 配料表 (包括配料、食物致敏物及添加劑)
  3. 保質期的說明
  4. 特別貯存方式或使用指示的陳述
  5. 重量、數量或體積
  6. 製造商或包裝商的名稱及地址
  7. 營養標籤

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The Guidelines 指引

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Purpose 目的

- To promote good practice among the trade in providing 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 132W)

- 旨在向業界推廣在食物標籤上提供可閱的資料的良好做法

- 當局於詮釋《食物及藥物(成分組合及標籤)規例》(第132W章)中訂明的食物標籤可閱性的要求時會參考這指引

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Process 過程

- Develop Draft Guidelines

- Upload to website for consultation (Dec 2011)

- Consult Trade (Trade Consultation Forum, Working Group on Nutrition Labelling; Dec 2011- Apr 2012)

- Consult consumers (Consumer Council, consumer representatives; Feb-Apr 2012)

- Revise Guidelines

- 製作指引擬稿

- 上載至網頁以作咨詢 (2011年12月)

- 咨詢業界 (業界咨詢論壇, 營養標籤工作小組; 2011年12月- 2012年4月)

- 咨詢消費者 (消費者委員會, 消費者代表; 2012年2至4月)

- 修訂指引

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Comments received 收集的意見

- Comments from trade
  - Recognize the importance of legible food label
  - Concerned about the type size requirement
  - Have raised different views on the detailed requirement

- Comments from consumers
  - Font size should be specified (e.g., in millimeter)
  - Words should be clearly shown
  - There should be enough spacing between words and lines
  - There should be good contrast between the type and the background. For example, appropriate coloured background could be added to the label area when food label is printed on transparent plastic bag

- 業界的意見：
  - 認同清晰可閱的標籤的重要性
  - 對字體大小要求表示關注
  - 對細則提出不同意見

- 消費者的意見：
  - 應指明字體大小 (如以毫米顯示)
  - 字體應清晰
  - 字與字及每行之間應該有適當間距
  - 字體與背景應有相當對比。例如，當標籤印刷於透明袋時，可在標籤範圍加上適當的背景顏色

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Content of the Guidelines
指引內容

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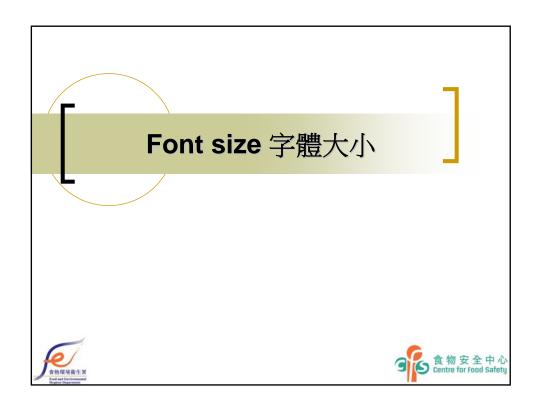Centre for Food Safety

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Principles原則

- Ensure the labels are legible

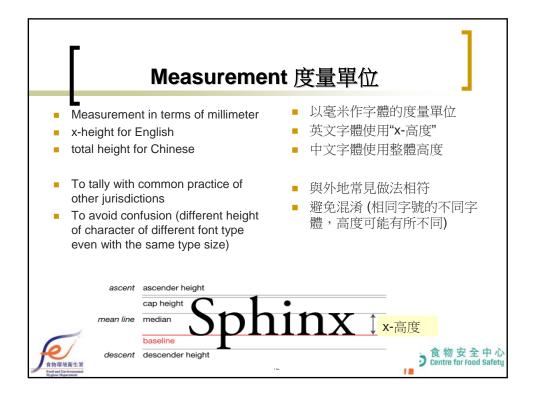- Making reference to practice and experience of other jurisdictions
  – most of the prepackaged food products in Hong Kong are imported

- Taking traders' and consumers' comments into consideration

- 以確保標籤清晰可閱為原則

- 參考外地的做法及經驗 – 香港大部份的預先包裝食物皆自外地進口

- 考慮業界及消費者的意見

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Font size 字體大小

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Measurement 度量單位

- Measurement in terms of millimeter
- x-height for English
- total height for Chinese

- To tally with common practice of other jurisdictions
- To avoid confusion (different height of character of different font type even with the same type size)

- 以毫米作字體的度量單位
- 英文字體使用"x-高度"
- 中文字體使用整體高度

- 與外地常見做法相符
- 避免混淆 (相同字號的不同字體，高度可能有所不同)

ascent	ascender height
	cap height
mean line	median
	baseline
descent	descender height

Sphinx

x-高度

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Font, Point and Height 字體、點數與高度

Point 點	Font 字體	Approximate total height (mm) 大約整體高度 (毫米)	Approximate x-height (mm) 大約 x-高度 (毫米)
8	Garamond	2.9	1.1
	Times New Roman	2.9	1.3
	Arial	2.9	1.5
	Comic Sans MS	2.8	1.5
	Verdana	2.8	1.5
	新細明體	2.6	-
	細明體	2.6	-
	標楷體	2.5	-

Font, Point and Height 字體、點數與高度

Point 點	Font 字體	Approximate total height (mm) 大約整體高度 (毫米)	Approximate x-height (mm) 大約 x-高度 (毫米)
5	Garamond	1.8	0.7
	Times New Roman	1.8	0.8
	Arial	1.7	0.9
	Comic Sans MS	1.7	0.9
	Verdana	1.7	0.9
	新細明體	1.7	-
	細明體	1.7	-
	標楷體	1.6	-

Recommendation 建議

- **In general,**

  - **at least 1.2mm x-height for English text, and**

  - **a comparable size for Chinese text**

- 一般情況下，使用

  - **x-高度不小於 1.2毫米的英文字，及**

  - 大小相若的中文字體

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Recommendation 建議

- When practically not feasible, such as:

  - Products in smaller package with a total surface area of less than 400cm²

  - Products that may be required to present other information in addition to those required by HK Laws, such as those required by international standards or guidelines

  - Infant formula and related food products that may need to provide detailed nutrition information and instruction for consumer use

  - Information presented in more than one language, thus the font size has to be adjusted

  - Imported product with limited spacing for affixing label with larger font size due to package constraints

當有困難時，例如：

  - 包裝總面積小於400平方厘米的較小包裝產品

  - 除標示本港法例要求列出的食物標籤資料，亦需標示其他國際標準或指引要求的資料

  - 需詳列營養成分及使用方法的嬰兒奶粉及相關產品

  - 以多種語言標示，以致字體大小需相對調整

  - 部分從外地進口的產品，因包裝設計所限，未必有足夠空間貼上以較大字體印製的標籤

Recommendation 建議

- The following minimum font size should be provided:

- **English letters: 0.8mm x-height**
  - Minimum font size for small packing in Canada (bilingual label)
  - Smallest font size requirement among EU, USA, Canada and Australia

- **Chinese characters: 1.8mm total height**
  - Smallest font size requirement among Mainland China and Taiwan

- 任何情況下，標示的字體最小應達到：

- 英文字**x-**高度最少**0.8mm**
  - 加拿大**(**雙語標籤**)**對小包裝字體的最低要求
  - 為歐盟、美國、加拿大、澳洲之中的最低要求

- 中文字整體高度需達**1.8mm**
  - 內地及台灣對字體的最低要求

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Contrast, Spacing and Others
對比、空間及其他

Good contrast 鮮明對比

- Use all black or single dark colour type, printed on a white or other single light colour contrasting background, whenever practical
- It is also acceptable to do it vice versa as long as the words are clearly shown

- 在可行的情況下，建議選用全黑色或單一深色的字體，並列印在白色或單一淺色、具適當對比的背景上
- 只要字句能清楚顯示，相反做法亦可接受

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Products packed in transparent containers 透明容器包裝的食物

- For products packed in transparent containers, 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.

- 對於以透明容器包裝的食物，於標籤範圍加上不透明、具適當對比的背景，以免標籤的清晰度受食物的顏色或外形影響

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Enough spacing 足夠空間

- 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

- 字句需清楚展示，字句與字句，以及字句與分隔或包圍資料的間隔線/框線(如有的話)，不得緊貼或重叠

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Other Factors 其他因素

- The clarity of words may be enhanced by other relevant factors such as
  - appropriate font type
  - suitable printing technology
  - non-reflective printing surface

- 其他可提升字體的清晰度的因素
  - 恰當的字款
  - 合適的印刷技術
  - 使用不反光印刷表面

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Examples 例子

- Good examples of legible food labels and examples of llegible food labels will be included in the guidelines for trade's reference

- 指引會包括一些可閱標籤的良好例子及不可閱的標籤的例子，以供業界參考

Way Forward 前瞻

Way Forward 前瞻

- Discussion in LegCo Panel on Food Safety and Environmental Hygiene in May
- Expected to be finalised in May 2012

- 五月份於立法會立法會食物安全及環境衞生事務委員會討論
- 預計在2012年5月定稿

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~ End 完 ~

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