

# 食物內添加的亞硝酸鹽/硝酸鹽與標示方法

## Nitrite/nitrate added in food and labelling



業界諮詢論壇  
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# 食物內添加的亞硝酸鹽/硝酸鹽與標示方法

## Nitrite/nitrate added in food and labelling

- 食物業可能會在食物 (例如: 加工肉類) 中添加亞硝酸鹽/硝酸鹽，食物安全中心現再次呼籲業界遵守有關法例規定，並依從優良製造規範，使用法例准許的食物添加劑及適當地標示。
- Food trade may add nitrite/nitrate added in food (e.g. processed meat),, the Centre for Food Safety is now called on the trade again to comply with the legal requirements, follow good manufacturing practices, use permitted food additives and label in an appropriate manner.

# 亞硝酸鹽及硝酸鹽的功用

## Functions of nitrite/nitrate in food

- 在食物(例如加工肉類)中用作防腐劑以抑制細菌生長，特別是肉毒桿菌
- 肉毒桿菌能夠產生神經毒素，即使含量很低也會危及生命
- Use as preservatives in food (e.g. processed meat) to suppress the growth of bacteria, in particular *Clostridium botulinum*
- *Clostridium botulinum* can produce a neurotoxin that is life-threatening even at very low levels

# 亞硝酸鹽及硝酸鹽的功用

## Functions of nitrite/nitrate in food

- 增強加工肉類的色澤
- 有助於形成特有的醃製風味
- 防止在貯存期間因氧化而產生異味
- Enhance the colour of processed meat
- Aid the development of the characteristic cured flavour
- Prevent the formation of off-flavours from oxidation during storage

# 亞硝酸鹽及硝酸鹽的安全性

## Safety of nitrite and nitrate

- 中國大陸、美國、歐洲聯盟成員國及澳洲等多地都准許在食物中使用亞硝酸鹽及硝酸鹽
- 聯合國糧食及農業組織/世界衛生組織食品添加劑聯合專家委員會已評估亞硝酸鹽及硝酸鹽的安全性，分別訂定了健康參考值
- Nitrite and nitrate are permitted for use in foods in many places (e.g. Mainland China, the United States, the European Union and Australia)
- The Joint Food and Agriculture Organization / World Health Organization Expert Committee on Food Additives (JECFA) evaluated the safety of nitrite and nitrate, and allocated health-based guidance values to them respectively

# 防腐劑的監管

## Regulation of Preservatives

- 業界在食物內使用防腐劑須遵照《食物內防腐劑規例》（第132BD章）中的規定。第132 BD章訂明任何進口、為出售而製造或供出售的食物只可含有於附表一所指明的准許防腐劑或抗氧化劑及其分量不可超過最高准許含量。
- Food trade using preservatives in food must comply with the Preservatives in Food Regulation (Cap. 132BD), which stipulate that any food being imported, manufactured for sale, or sold should only contain permitted preservatives or antioxidants and in the proportion that does not exceed the maximum permitted levels in Schedule 1 of the Regulation.

# 防腐劑的監管

## Regulation of Preservatives

附表1

[第2、3及11條及附表1A]

SCHEDULE 1

[ss. 2, 3 & 11 & Sch. 1A]

可含食物添加劑的食物及在每個情況下食物添加劑的種類及分量

FOOD WHICH MAY CONTAIN FOOD ADDITIVE AND THE DESCRIPTION AND PROPORTION OF FOOD ADDITIVE IN EACH CASE

第1欄		第2欄		第3欄	第4欄
編號	食物分類或細分類	准許食物添加劑		最高准許含量(百萬分率, 除非另有指明)	附註
		國際編碼系統編號	名稱說明		
8.2.4.1	經加熱處理的醃製肉類	250	亞硝酸鈉	125	
		251	硝酸鈉	500	

Column 1		Column 2		Column 3	Column 4
No.	Food category or sub-category	Permitted food additives		Maximum permitted level (ppm, unless otherwise specified)	Note
		INS no.	Name		
8.2.4.1	Cured and heat-treated meat	250	Sodium nitrite	125	
		251	Sodium nitrate	500	

# 預先包裝食物的標籤法例

## Labelling Legislation of Prepackaged Food

**食物名稱**  
Name of the food

- 須加上可閱標記，不得就食物的性質有虛假、誤導或許騙成分。
- It shall be legibly marked and shall not be false, misleading or deceptive as to the nature of the food.

**製造商或包裝商的名稱及地址**  
Name and address of manufacturer or packer

**保質期的說明**  
Indication of durability

- "此日期或之前食用" 或 "此日期前最佳"
- "Use by" or "Best before" date.

**數量、重量或體積**  
Count, weight or volume

**配料表**  
List of ingredients

- 配料須按用於食物包裝時所佔的質量或體積，由大至小依次表列。
- 如含有法例中列明的食物致敏物，必須標示。
- 如使用添加劑，須標示其作用類別和其本身所用名稱或國際識別編號（不論是否以"E"或"e"為詞頭）。
- Ingredients should be listed in descending order of weight or volume determined as at the time of their use when the food was packaged.
- Allergenic substances stated in the law should be specified if they are present in the food.
- Functional class of an additive and its specific name or international identification number (with or without the prefix "E" or "e") should be specified if it is used.

**特別貯存方式或使用指示的陳述**  
Statement of special conditions for storage or instructions for use





# 預先包裝食物的標籤法例

## Labelling Legislation of Prepackaged Food

- 目前，《食物及藥物(成分組合及標籤)規例》(第132W章)規定，除非獲得豁免，否則所有預先包裝食物均須加上包括下列資料的可閱標記：
  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；
  5. 數量、重量或體積；
  6. 製造商或包裝商的姓名或名稱及地址；及
  7. 營養標籤。
- At present, The Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), requires the following information to be legibly marked on the food label of all prepackaged food, 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 for use;
  5. Count, weight or volume;
  6. Name and address of manufacturer or packer; and
  7. Nutrition label.

# 預先包裝食物內食物添加劑的標示

## Labelling of Food Additives in Prepackaged Food

根據《食物及藥物(成分組合及標籤)規例》(第132W章)，在本港出售的預先包裝食品如使用了食物添加劑，必須—

- 在食物標籤上的配料表中列明其作用類別;及
- 其本身所用名稱;或
- 它在食物添加劑國際編碼系統中的識別編號；或
- 它在食物添加劑國際編碼系統中以“E”或“e”為詞頭的識別編號。

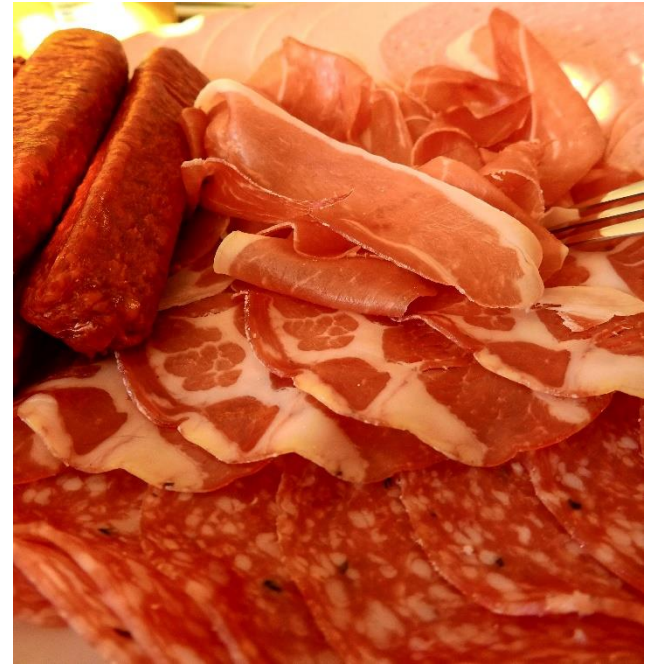
According to the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), if a food additive is used in a prepackaged food available in Hong Kong, it must be —

- listed by its functional class; together with
- its specific name; or
- its identification number under the International Numbering System for Food Additives; or
- its identification number under the International Numbering System for Food Additives with the prefix “E” or “e”.

# 預先包裝食物內食物添加劑的標示方法

## Labelling of Food Additives in Prepackaged Food

- 例如，硝酸鈉如加入食物中作為防腐劑，須在配料表上標示：
- 防腐劑（硝酸鈉）或防腐劑（251）或防腐劑（E251）或防腐劑(e251）
- For instance, if sodium nitrate is added to the food as a preservative, it has to be labelled in the ingredient list as either :
- Preservative (sodium nitrate ) or Preservative (251) or Preservative (E251) or Preservative (e251)



# 「否定聲稱」 'Negative Claims'

- 「否定聲稱」常見於預先包裝食品。
- 一些食品聲稱「不含」某些物質，這些成分並非食品固有，或是已從製成品中去除。其他聲稱強調不添加某些成分，例如「不加硝酸鹽」的火腿產品，意即在生產過程中沒有添加防腐劑。
- “Negative claims” are commonly found in pre-packaged foods.
- Some foods claim to be "free" of substances that are not inherent in the food or that have been removed from the finished product. Other claims emphasize the absence of certain ingredients, such as “no added nitrate” ham products, meaning no preservatives are added during the production process.

# 「否定聲稱」 'Negative Claims'

- 這些聲稱的含義可能各有不同。業界應審慎作出「否定聲稱」，不應誤導消費者，並要避免令人對產品的成分組合有錯誤印象。
- These claims may have different meanings. The trade should be vigilant about making “negative claims”, which should not be misleading and should avoid giving consumers erroneous impressions about the composition of products.

# 最高罰則

## Maximum Penalty

- 假如本署有足夠證據證明有關人士違反有關規例的規定，便會對其採取法律行動。違例者一經法庭定罪，最高罰則是可被判處罰款 50,000 元和監禁 6 個月。
- If there is sufficient evidence to prove any contravention under the Regulations, legal action will be taken against the offender. Upon conviction by the Court, the offender is liable to a maximum fine of \$50,000 and 6 months imprisonment.

# 參考

## Reference

### ■ 常見的問題

#### □ 食物標籤

[https://www.cfs.gov.hk/english/faq/faq\\_03.html](https://www.cfs.gov.hk/english/faq/faq_03.html)

#### □ 營養標籤

[https://www.cfs.gov.hk/english/faq/faq\\_14.html](https://www.cfs.gov.hk/english/faq/faq_14.html)

[http://www.cfs.gov.hk/english/programme/programme\\_nifl/programme\\_nifl\\_faq.html](http://www.cfs.gov.hk/english/programme/programme_nifl/programme_nifl_faq.html)

#### □ 食物添加劑 / 污染物

[https://cfs.fehd.hksarg/english/faq/faq\\_02.html](https://cfs.fehd.hksarg/english/faq/faq_02.html)

### ■ Frequently Asked Questions

#### – Food Labelling

[https://www.cfs.gov.hk/english/faq/faq\\_03.html](https://www.cfs.gov.hk/english/faq/faq_03.html)

#### – Nutrition Labelling

[https://www.cfs.gov.hk/english/faq/faq\\_14.html](https://www.cfs.gov.hk/english/faq/faq_14.html)

[http://www.cfs.gov.hk/english/programme/programme\\_nifl/programme\\_nifl\\_faq.html](http://www.cfs.gov.hk/english/programme/programme_nifl/programme_nifl_faq.html)

#### – Food Additives / Contaminants

[https://cfs.fehd.hksarg/english/faq/faq\\_02.html](https://cfs.fehd.hksarg/english/faq/faq_02.html)

# 參考

## Reference

- 預先包裝食物標籤知多點

[http://www.cfs.gov.hk/tc\\_chi/multimedia/multimedia\\_pub/files/food\\_label\\_pos.pdf](http://www.cfs.gov.hk/tc_chi/multimedia/multimedia_pub/files/food_label_pos.pdf)

- 食品法典委員會的 GSFA 數據庫

<https://www.fao.org/gsfaonline/additives/search.html>

- Know More About the Label of Prepackaged Food

[http://www.cfs.gov.hk/english/multimedia/multimedia\\_pub/files/food\\_label\\_pos.pdf](http://www.cfs.gov.hk/english/multimedia/multimedia_pub/files/food_label_pos.pdf)

- GSFA Database Search by Codex Alimentarius Commission

<https://www.fao.org/gsfaonline/additives/search.html>



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# - 問與答 -

## Q & A

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謝謝  
Thank you