Nutritional Labelling of formula products and foods

Legislative Proposal Relating to
Formula Products and Foods Intended for
Infants and Young Children under the Age of 36 Months
in Hong Kong

4th Technical Meeting with Trade

(Laboratory Service Providers)

17 October 2013

食物環境衞生署
Food and Environmental Hygiene Department

食物安全中心
Centre for Food Safety

Codex Requirement

- CODEX STAN 72 – 1981 covers nutrition labelling of infant formula
- CODEX STAN 156 – 1987 covers nutrition labelling of follow-up formula
- CODEX STAN 74 – 1987 and CODEX STAN 73 – 1981 cover nutrition labelling of foods intended for infants and young children

Nutrition labelling of infant formula

Nutrition labelling of infant formula

- Codex STAN 72-1981 requires labelling of "1+29":
  - Energy
  - Protein, Carbohydrates
  - Fat
  - 13 Vitamins
  - 12 Minerals and trace elements
  - 1 Other substance (Choline)

- Some traders request to adopt "1+29" to tally with Codex requirements

Comparison of nutrition labelling compulsory requirements of infant formula in Codex standard and major countries and territories

	Labelling Requirement	Remark
Codex	"1+29"	
European Union	"1+32"	"1+29" + Inositol + Carnitine + Fluoride
Australia / New Zealand	"1+28"	"1+29" - Choline
Singapore		
Mainland		
USA	"1+31"	"1+29" - Selenium + Linoleic acid + Inositol + Water

Market situation

- 74% of infant formula products were found fulfilling “1+29” nutrition labelling requirement of Codex based on a check conducted in 2012

Nutrition labelling of infant formula

- According to CODEX STAN 72 – 1981, fluoride should not be added to infant formula. Its level should not exceed 100 µg/100 kcal or 24 µg/100 kJ in the infant formula prepared ready for consumption

- Aus/NZ requires infant formula having exceeding level of fluoride to bear some sorts of warning statements to remind consumers on the risk of dental fluorosis

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Nutrition labelling of follow-up formula

Nutrition labelling of follow-up formula

- Propose to adopt nutrition labelling requirements of “1+25” (energy and 25 nutrients) laid down in CODEX STAN 156 – 1987

Nutrition labelling of foods intended for infants and young children

Nutrition labelling of foods intended for infants and young children

- Proposed to mandate the labelling of such food with energy, protein, fat and carbohydrates, as well as other specified nutrients applicable to certain food categories, following the Codex requirements laid down in CODEX STAN 73 – 1981 and CODEX STAN 74 – 1981

Labelling requirements in Codex Standards

Nutrients	Cereal-based baby foods				Canned baby food
	Cereal to be prepared with milk or nutritious liquid	Cereal with an added high protein food	Pasta	Rusk and biscuit	
Energy	✓	✓	✓	✓	✓
Protein	✓	✓	✓	✓	✓
Carbohydrates	✓	✓	✓	✓	✓
Fats	✓	✓	✓	✓	✓
Sodium	✓	✓	✓	✓	✓ (if added)
Calcium		✓		✓ (if milk is added)	
Vitamin B1	✓	✓	✓	✓	
Vitamin A	✓ (if added)	✓	✓ (if added)	✓ (if added)	
Vitamin D	✓ (if added)	✓	✓ (if added)	✓ (if added)	
Other nutrients					

Nutrition labelling of foods intended for infants and young children

- Traders comment on the difficulty in providing substantiation on the cereal content of the foods for classification

- Considering to regulate such foods with same set of labelling requirements

Expression of energy and nutrients contents in NL

- Different expressions
  - per 100g / 100ml as sold
  - per serving
  - per 100ml as consumed
  - per 100kcal / 100kJ as consumed
- Unit of energy
  - kcal
  - kJ
  - kcal + kJ

Overseas requirements on expression of energy and nutrients contents in NL of infant formula

		Codex	EU	US	Australia/ New Zealand	Singapore	Mainland China
Unit of food	Energy	GS+GC	GC	*	GC	GC	G/S
	Nutrients	GS+GC	GC	CC	GC	GC	G/S+JC
Energy	kcal only			*			
	kJ only				✓		✓
	kcal + kJ		✓ (a/v)				
	kcal and/or kJ	✓					
	not specified					✓	

Key: GS= per 100g (or 100 mL) as sold
GC= per 100 mL as consumed
G/S= per 100g (or 100 mL) or per serving
CC= per 100 kcal as consumed
JC= per 100kJ as consumed
a/v = available
* = to declare no. of fluid ounces supplying 100kcal

Language requirements in existing NL Scheme

- The nutrition label can be written in the English language, the Chinese language or in both languages, but numbers may be expressed in Arabic numerals

- The nutrition label should be in both English and Chinese languages if both languages are used in the marking or labelling of the foods

Way forward

- We suggest to include labelling requirements of different products in the proposed regulation with consideration of the comments from traders

For comments and discussion