TECHNICAL ISSUES ON NUTRITION LABELLING

– TOLERANCE LIMITS –

BACKGROUND

Sources of nutrient information used to formulate the nutrition label vary from direct analysis and indirect analysis. Despite the method used, enforcement action would be based on test results obtained by the Government Laboratory. The test result is compared against the compliance limits (i.e., label value[1] plus tolerance). Therefore, the levels of tolerance limits would greatly affect the compliance limits.

2. Currently, there is no internationally accepted tolerance limit for nutrition information on food labels (i.e., tolerance limits are not specified in the Codex Guidelines on Nutrition Labels). However, tolerance limits can be found in some nutrition labelling regulations/guidelines worldwide (Annex I).

SETTING OF TOLERANCE LIMITS

3. Not every country/area with a nutrition labelling scheme published the tolerance limits. Of those released, two approaches were identified in setting tolerance limits -

i. the label value should fall within a specified range (e.g., ± 20% of the label value); and
ii. the label value should be equal/less than or equal/more than a maximum or minimum value (e.g., ≤ 120% of the label value or ≥ 80% label value).

[1] The label value should be the maximum or minimum pre-round value.

Specified Range Approach

4. Under the specified range approach, a tolerance limit of ± 20% of the label value of macronutrients is widely acceptable. As for micronutrients (i.e., vitamins and minerals), the tolerance limits vary according to the nature of the nutrient. For micronutrients that are more stable, i.e., minerals and fat soluble vitamins, the range tends to be narrower. On the other hand, the range for water soluble vitamins tends to be wider.

Maximum/Minimum Approach

5. For nutrients that will bring a negative impact on health in case of imbalance intake (e.g., total fat, saturated fat, cholesterol, sodium, etc.), the tolerance limit is generally set at ≤ 120% of the label value. On the other hand, for those that are positive to health (e.g., protein, dietary fibre, vitamins, etc.), the tolerance limit is commonly set at ≥ 80% label value.

6. Other than "negative" and "positive" nutrients, some countries/areas established a separate tolerance limit for added nutrients. Since the amount of nutrients added to the food can be precisely controlled by the manufacturer, the tolerance limit set for added nutrient is at the level of not less than 100% of the label value.

Proposed Tolerance Limits for the Nutrition Labelling Scheme in Hong Kong

7. During the consultation exercise, the trade has repeatedly expressed their wish to have the same labelling scheme on nutrition information as the Mainland. Although the Mainland's scheme is not yet forthcoming, they have already proposed some criteria for setting the tolerance limits. Taking the trade's comments into consideration, it is proposed that the tolerance limits proposed in

the Mainland be adopted for the NL scheme in Hong Kong, details as follows : -

	The Mainland (proposed)
Energy	± 20%
Protein	± 20%
Carbohydrate	± 20%
Total Fat	± 20%
Saturated Fat	± 20%
Sodium	≤ 120%
Cholesterol	± 20%
Sugars	± 20%
Dietary Fibre	± 20%
Vitamins	Vitamins A, D : -20% to +80% Other vitamins : -20% to +250% (or no upper limit)
Minerals	-25% to +25% (or no upper limit)

VIEWS SOUGHT

8. Representatives from the trade and laboratory services providers are invited to comment on the proposal.

Food and Environmental Hygiene Department

June 2005