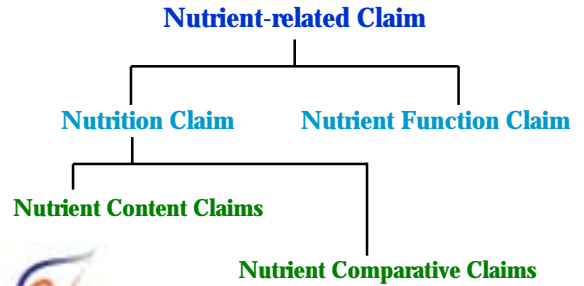


## Technical Issues on Nutrition Labelling

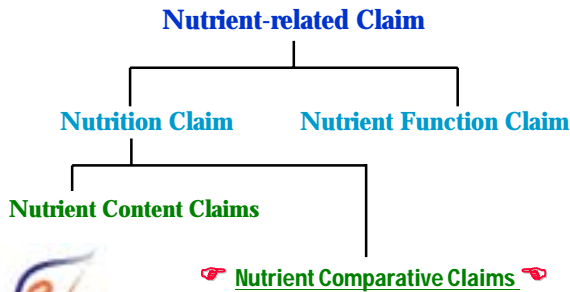
### - Nutrient Comparative Claim -



## Background



## Background



## Nutrient Comparative Claim

- Compares the nutrient levels of two or more similar food products; for example –
  - Reduced fat – 25% less than the regular product of the same brand



## Nutrient Content Claim vs. Nutrient Comparative Claim

### Nutrient content claims

- must meet the established conditions (rigid absolute values)

### Nutrient comparative claims

- compare between two or more similar prepackaged foods
- must satisfy a set of established conditions (including relative difference and absolute difference)



## Nutrient Content Claim vs. Nutrient Comparative Claim (cont.)

| Nutrient Content Claim | Nutrient Comparative Claim  |
|------------------------|-----------------------------|
| Low in fat             | Lower in fat / Light in fat |
| High calcium           | Higher calcium              |



## Nutrient Comparative Claim under the Local NL Proposal

### Subjects of Nutrient Comparative Claims

- Energy
- Protein
- Carbohydrate
- Fat (varies types)
- Cholesterol
- Sugars
- Dietary fibre
- Sodium
- Vitamins (with NRV)
- Minerals (with NRV)



## Nutrient Comparative Claim under the Local NL Proposal (cont.)


### Labelling Requirements

- Claimed nutrient(s)
- Triggered cluster declaration
  1. Claims on fat/cholesterol – Must provide the information on saturated fat, monounsaturated fat, polyunsaturated fat, cholesterol and trans fat (in Phase II).
  2. Claims on carbohydrate/sugars – Must provide the information on sugars.



## Nutrient Comparative Claim under the Local NL Proposal (cont.)


### Claims Conditions

- Adopt principles established by Codex
1. The foods being compared should be different versions of the same food or similar foods. The foods being compared should be clearly identified; 
  2. A statement of the amount of difference in the nutrient content related to the same quantity should be given in close proximity to the nutrient comparative claim;



## Nutrient Comparative Claim under the Local NL Proposal (cont.)

### Claims Conditions (cont.)

3. The comparison should be based on a relative difference of at least 25% in the nutrient content between the compared foods. For micronutrients, a 10% difference in the NRV would be acceptable; and
4. The comparison should be based on a minimum absolute difference in the nutrient content equivalent to the figure defined as “low” or as a “source” in the Table of Conditions for Nutrient Content Claims. 



## Nutrient Comparative Claim under the Local NL Proposal (cont.)

### Compared Foods / Reference Foods

- Regular version of the food product produced by the same company
- Average nutrient value of top three brands or representative value from food composition database

| Prepackaged food with a claim | Compared/Reference food                              |
|-------------------------------|------------------------------------------------------|
| ABC low fat milk              | ABC whole milk                                       |
| ABC low fat milk              | XYZ whole milk<br>MN's whole milk<br>VV's fresh milk |
| ABC low fat milk              | valid food composition database                      |



## Nutrient Comparative Claim under the Local NL Proposal (cont.)

### Requirements on Differences (Example 1 – Lower in fat)

- Reference food – TY's Product W contains 15 g of fat per 100 g of food
- “Low fat” claim condition – not more than 3 g of fat per 100 g of solid food

|                                | TY's Prod. U<br>("lower in fat") | TY's Prod. V<br>("lower in fat") | Meeting the conditions set for relative difference absolute diff |           |
|--------------------------------|----------------------------------|----------------------------------|------------------------------------------------------------------|-----------|
|                                |                                  |                                  | Product U                                                        | Product V |
| Fat content (per 100 g food)   | 6 g                              | 12 g                             | ---                                                              | ---       |
| Relative diff. (min 25%)       | 60%                              | 20%                              | ✓                                                                | ✗         |
| Absolute diff. (min 3 g/100 g) | 9 g                              | 3 g                              | ✓                                                                | ✓         |



## Nutrient Comparative Claim under the Local NL Proposal (cont.)

### Requirements on Differences (Example 2 – Extra Calcium)

- Reference food - *TY's* Product C contains 100 mg of calcium per 100 g of food
- Assuming NRV for calcium is 800 mg
- Criteria 1 - 10% NRV difference (**80 mg per 100 g**)
- Criteria 2 – Difference equivalent to “Source of calcium” claim condition (not less than 15% NRV per 100 g of solid food (i.e., **120 mg per 100 g**))

|                                  | <i>TY's</i> Prod. A<br>("extra calcium") | <i>TY's</i> Prod. B<br>("extra calcium") | Meeting Criteria 1 and 2     |                              |
|----------------------------------|------------------------------------------|------------------------------------------|------------------------------|------------------------------|
|                                  |                                          |                                          | Product A                    | Product B                    |
| Calcium content<br>(/100 g food) | 250 mg                                   | 190 g                                    | ---                          | ---                          |
| Difference in calcium content    | 150 mg                                   | 90 mg                                    | ✓ Criteria 1<br>✓ Criteria 2 | ✓ Criteria 1<br>× Criteria 2 |

- ENDS -

