

## TECHNICAL ISSUES ON NUTRITION LABELLING

### – NUTRITION CLAIM : NUTRIENT COMPARATIVE CLAIM –

#### BACKGROUND

Apart from nutrient content claims, nutrient comparative claims are also commonly found in the local market. Although nutrient content claims and nutrient comparative claims look very much the same sometimes (Table 1), they are different in nature. Basically, nutrient content claim can be made if the nutrient content of a particular nutrient of a prepackaged food meets the established conditions, which are rigid absolute values. For nutrient comparative claims, comparison needs to be made between two or more similar prepackaged food products. A comparative claim can only be made after satisfying the conditions set for making such claims.

Table 1 – Nutrition Claims

Nutrient <i>Content</i> Claim	Nutrient <i>Comparative</i> Claim
Low in fat	Lower in fat / Light in fat
High calcium	Higher calcium

#### NUTRITENT COMPARATIVE CLAIMS UNDER THE LOCAL SCHEME

##### Subjects of Nutrient Comparative Claims

2. Same as nutrient content claims, the only nutrient comparative claims permitted shall be those relating to energy, protein, carbohydrate, and fat and components thereof (such as saturated fat), cholesterol, sugars, dietary fibre and sodium, plus vitamins and minerals for which Nutrient Reference Values (NRVs) have been laid down for nutrition labelling purpose.

## **Labelling Requirements**

3. For all nutrient-related claims, the amount of claimed nutrients should be declared on the nutrition label. Furthermore, triggered cluster declarations are required for claim on fat/cholesterol and carbohydrate/sugars.

- Claims on fat / cholesterol – Where a claim is made regarding the amount and/or type of fat or the amount of cholesterol, the amounts of saturated fat, monounsaturated fat, polyunsaturated fat and cholesterol should be declared. Furthermore, in addition to the above, any fat or cholesterol claim should be accompanied by declaration of trans fat in Phase II.
- Claims on carbohydrate / sugars – Where a claim is made regarding the amount and/or type of carbohydrate, the amount of total sugars should be listed.

## **Conditions for Nutrient Comparative Claims**

4. We propose to adopt the principles for the use of nutrient comparative claims established by Codex :

- i. The foods being compared should be different versions of the same food or similar foods. The foods being compared should be clearly identified;
- ii. 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;
- iii. 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
- iv. 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.

### Compared Foods / Reference Foods

5. If a company produces a regular version and a special version of a particular food, e.g., *ABC* whole milk and *ABC* low fat milk, then the most obvious reference food will be the regular version of that particular product produced by the same company. However, if only the special version of a product is produced, then the regular version of the same or similar products produced by other companies can be the reference foods. With reference to the USA NL Scheme, when making comparison, it is suggested that the average nutrient value of top three brands or representative value from valid food composition database<sup>1</sup> should be applied.

### Criteria on Difference in Nutrient Contents

6. In order to put forward a nutrient comparative claim on energy or macronutrients, such as protein, carbohydrate, fat, cholesterol, sugars, etc., there should be a relative difference of at least 25% in nutrient content and a minimum absolute difference equivalent to the figure defined as “low” or as “source”. As for micronutrients with NRV, the difference in nutrient content should be at least 10% NRV or equivalent to the figure defined as “low” or as “source”, whichever the value is more significant. For illustrations, please refer to Annex 1.

## **VIEWS SOUGHT**

7. Representatives from the trade are invited to comment on the proposed principles for nutrient comparative claims for the Labelling Scheme on Nutrition Information in Hong Kong.

Food and Environmental Hygiene Department

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<sup>1</sup> Data of food composition databases should be based on representative samples analyzed by using validated test methods.

**Nutrient Comparative Claims – Requirements on Difference in Nutrient Contents****Example 1 - “Lower in fat” Claim**

- 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

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

**Example 2 - “Extra calcium” Claim**

- 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</i> 's Product A (“extra calcium”)	<i>TY</i> 's Product B (“extra calcium”)	<i>Meeting Criteria 1 and 2</i>	
			Product A	Product B
Calcium content (per 100 g food)	250 mg	190 g	---	---
Difference in calcium content	150 mg	90 mg	✓ Criteria 1 ✓ Criteria 2	✓ Criteria 1 ✗ Criteria 2