Trade Guidelines on Preparation of Legible Food Label

Purpose

Food label is an important channel of communication between manufacturers and consumers on information about a food product. A legible food label with essential information of the product appropriately marked would assist consumers make informed choices. To promote good practice, this set of guidelines aims at assisting the trade to provide legible information on food label. Officers will also make reference to the guidelines in the interpretation of legibility requirements of food label as stipulated in the Food and Drugs (Composition and Labelling) Regulations (Cap. 132 W).

Background

2. At present, Cap. 132 W requires the following information to be legibly marked on the food label of all prepackaged food, unless otherwise exempted-
   (i) Name of the food;
   (ii) List of ingredients (including ingredients, allergenic substances and additives);
   (iii) Indication of durability;
   (iv) Special conditions for storage or instruction for use;
   (v) Count, weight or volume;
   (vi) Name and address of manufacturer or packer; and
   (vii) Nutrition label.

3. The trade has liberty to design the food label of their products. However, when preparing food labels, apart from putting efforts on designs which could attract attention from their potential buyers, it is also important for traders to note the legal requirement on legibility and to show the required information clearly. When a food label is not properly designed, consumers may have difficulty reading the labels for information they required. This set of guidelines provides principles and examples of legible food labels for traders’ reference.
Elements of legible food label

4. A number of factors can affect the legibility. The obvious ones include: font size, contrast between the background and the text, and the spacing between the lines. In principle, the font size used in the food label should be as large as possible to facilitate the consumers to read the labels easily.

5. The following provides specific recommendations on the key elements for a reasonably legible food label:

(i) Suitable font size

In general, a font size of at least 1.2 mm x-height* for English letter and Chinese characters in comparable size is recommended (see example 1). However, the recommended font size may not be always practically feasible. Examples of these situations are some products with limited package size (e.g. package of total surface area less than 400 cm²), some products required to present information in addition to local laws such as those required by international standards and guidelines, infant formula and related food products that needed to provide detailed nutrition information and instruction for consumer use, imported food products that have packaging with limited spacing for affixing label with larger font size, or when the information is presented in more than one language. Moreover, a minimum font size of at least 0.8 mm x-height for English letters and 1.8 mm total height for Chinese characters should be provided (see example 2).

* x-height is defined as the height of small character x as illustrated below:

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|       |
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|       |
+-------+
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Appendix
(ii) **Good contrast**

Whenever practical, all black or single dark colour type, printed on a white or other single light colour contrasting background is recommended. It is also acceptable to do it vice versa as long as the words are clearly shown. In addition, for products packed in transparent containers, it is recommended that the food label area should come with a non-transparent contrasting background, so that the clarity of the label would not be affected by the colour or appearance of the food.

(iii) **Enough spacing**

Words and characters should be displayed in such a manner that they never touch each other or the lines and borders surrounding or separating the information, if any.

6. Apart from the above elements, it is also noted that the clarity of words may be enhanced by other relevant factors such as appropriate font type, suitable printing technology and non-reflective printing surface.

**Good examples of legible food labels (Examples 1 – 3)**

**Example 1:**
At least 1.2 mm x-height for English letter and Chinese characters in comparable font size (general recommendation)

**Example 2:**
Black type on white background, English letter in x-height 0.8mm, Chinese character in 1.8mm total height

**Example 3:**
At least 1.2 mm x-height for English letter and Chinese characters in comparable font size (general recommendation)
Example 3:
Single dark colour type on light colour contrasting background

 Examples of illegible food labels (Examples 4 – 7)

Example 4:
Words could not be clearly shown on patterned background
Example 5:
Lack of contrast between text and dark colour background

洋蔥湯 ONION SOUP

成份: 水、洋蔥、粟米油、鹽、乳清蛋白質(奶類製品)、增味劑 (621)

Ingredients: Water, onion, corn oil, salt, whey protein (milk product), flavour enhancer (621)

用法: 將一罐清水拌入湯內,煲滾後方可飲用。

Directions: Blend soup with one can of water. Boil before serving.

製造商/包裝商: ABC有限公司. 香港健康路123号
Manufacturer/Packer: ABC Ltd. 123 Healthy Road, Hong Kong

製造商/包裝商: ABC有限公司. 香港健康路123號
Manufacturer/Packer: ABC Ltd. 123 Healthy Road, Hong Kong

此日期前最佳: DD MM YY
Best before: DD MM YY

營養資料 Nutrition Information

<table>
<thead>
<tr>
<th>成份</th>
<th>每 100 克/ Per 100g</th>
</tr>
</thead>
<tbody>
<tr>
<td>燃山</td>
<td>Energy</td>
</tr>
<tr>
<td>77 千卡/ kcal</td>
<td></td>
</tr>
<tr>
<td>鹽素</td>
<td>Protein</td>
</tr>
<tr>
<td>2.2 %/ g</td>
<td></td>
</tr>
<tr>
<td>總脂肪/ Total fat</td>
<td></td>
</tr>
<tr>
<td>3.0 %/ g</td>
<td></td>
</tr>
<tr>
<td>- 鹽素脂肪/ Saturated fat</td>
<td></td>
</tr>
<tr>
<td>0.8 %/ g</td>
<td></td>
</tr>
<tr>
<td>- 反式脂肪/ Trans fat</td>
<td></td>
</tr>
<tr>
<td>0 %/ g</td>
<td></td>
</tr>
<tr>
<td>碳水化合物/ Carbohydrates</td>
<td></td>
</tr>
<tr>
<td>10.4 %/ g</td>
<td></td>
</tr>
<tr>
<td>- 糖/ Sugars</td>
<td></td>
</tr>
<tr>
<td>3.6 %/ g</td>
<td></td>
</tr>
<tr>
<td>鈉/ Sodium</td>
<td></td>
</tr>
<tr>
<td>637 毫克/ mg</td>
<td></td>
</tr>
</tbody>
</table>

淨重: 300 克
Net weight: 300g

Example 6: Light colour type on white background; words are not clearly printed
Example 7:
Type size too small and words are not clearly shown (the smallest type size is much smaller than 0.8mm x-height for English letters and 1.8mm total height for numbers and Chinese characters)

Recommendation

7. Traders should observe the elements of legible food labels and make reference to the above examples when preparing food labels for their prepackaged products in order to comply with the legibility requirement of the food labelling regulation.

Centre for Food Safety
May 2012