

NEW DRAFT GB 7718 – LABELLING FOR PREPACKAGED FOODS



BACKGROUND

February 2017	Questionnaires were sent to consumers, food safety regulators and food production and operation companies to collect suggestions, complaints, reports and inputs based also on food labels litigations.
April 2017	The working group held a revision opinion consultation meeting, listened to opinions and suggestions of regulatory authorities, relevant experts, and industry.
August 2017 December 2017 January 2018	Three working group meetings were held to discuss and further revise the revised draft standards.
February 2018	A solicitation meeting was held to engage food and drug regulatory authorities, import and export food safety regulatory authorities, and relevant industry associations to discuss the draft standards. According to the discussion opinions of the meeting, further revision was made to the draft for comments.
December 2018	Draft circulated internally



MANDATORY CONTENT

- Product name
 - Ingredient list
 - Net content and specifications
 - Name, address and contact of the manufacturer or distributor
 - Date of manufacture
 - Date of minimum durability
 - Country of origin
 - Storage condition
 - Food production license number
 - Product standard code
 - Ingredients containing allergenic substances**
 - Grades and quality**
 - Others
- Package largest surface < ~~10~~ **20** cm², mandatory content only includes:
 - Product name
 - Net contents
 - Name and address of the manufacturer or distributor

Font size for mandatory content (except net content): ~~≥ 1.8mm~~ **2.0 mm if largest surface > 35- 40 cm²**

INGREDIENT DECLARATION - 1

- **Ingredient declaration not required for food made of only one ingredient**
- Descending order by mass (质量). (*no more “weight” 重量*)
- Breakdown of compound ingredients **added directly into food – no more brackets within brackets**
- In compound ingredients, additives shall be marked if the compound ingredient >25% of the final product and complies with carry over principle (***eliminated requirement that they shall not play any technological role***). E.g.: “sauce (with caramel color)”
- Additives marked as:
 - Specific name
 - Functional class (specific name)
 - Functional class (INS N.) only if largest surface ≤ 40 (60) cm²**
- **Substance made of food, bearing a certain packaging function and** edible together with the food therein, shall also be declared in the list of ingredients, unless otherwise provided in a national or trade standard, or national laws and regulations

INGREDIENT DECLARATION - 2

Ingredients	Declaration on label
Vegetable oils <i>[deleted express exception for olive oil] added in products different from oils</i>	“vegetable oil” or “refined vegetable oil”; if hydrogenated, the term “hydrogenated” or “partially-hydrogenated” shall be used
Microorganisms es used during production for fermentation purpose (other than those existing in the final product and not used for fermentation purpose)	“fermenting microbe” (发酵菌种) or “microbial starter” (微生物发酵剂)
Fruit juices, vegetable juices and fruit-and-vegetable juices not exceeding 2% by weight and made by more than one component	“fruit juice” (果汁), “vegetable juice” (蔬菜汁), “fruit and vegetable juice” (果蔬汁), “fruit juice concentrate” (浓缩果汁), “vegetable juice concentrate” (浓缩蔬菜汁), or “fruit-and-vegetable juice concentrate” (浓缩果蔬汁)
Food fragrance and flavoring	“edible fragrance”, “edible flavoring”, “edible fragrance and flavoring”, <i>“fragrance for food” (食品用香精)</i> , <i>“food fragrance” (食品香精)</i> , or <i>“flavoring for food” (食品用香料)</i>

QUID

- Required if labeling provides special emphasis on one/more special ingredients or components (*no more only for emphasis on “valuable” or “characterizing” ingredients*)

- **Emphasis is not existing if:**
 - ❑ **Ingredients listed in allergenic statement or other warnings;**

 - ❑ **Ingredients presented only in usage or food suggestions;**

 - ❑ **Ingredients presented only for sensory description (shape, flavor, taste, mouthfeel)**

- **If ingredient is present in the product name, emphasis is existing unless:**
 - ❑ **ingredients are in the food name under a national, trade, or local standard;**
 - ❑ **ingredients are added in quantity/percentage as required by national, trade, or local standard;**
 - ❑ **Ingredients presented only for sensory description (flavor, taste)**

QUID



Banana: clearly taste indication. Banana: no QUID.
Under GB 25191, milk content $\geq 80\%$. Milk QUID ?



“Strawberry yoghurt”.
Content indication or flavor
indication? QUID?

Open issues:

- What about foods whose GB only gives a range for use of ingredient ?
- When can ingredient within name be deemed as used for indicating taste?

QUID DECLARATION

Declaring the quantity added or content by number

- With 20g fruit/bag;
- With more than 6g of mixed nuts (peanuts, almonds, pistachio)/piece
- With more than 5g of Colombian Coffee/100mL;
- Jujube powder (10g);

Declaring the quantity added or content by percentage

- With more than 5% of berries;
- Added quantities of both strawberries and blueberries are not lower than 2.5%;
- The quantity of strawberry jam added is not lower than 3%;
- Imported milk powder ($\geq 3.2\%$);
- Total fruit juice (by original fruit juice) $\geq 2.5\%$;

Declaring content by a variable range

- Rapeseed oil $20\% \pm 5\%$ ($20 \pm 5\%$);
- Peanut $50\text{g} \pm 5\text{g}$;
- Banana powder $10 \sim 12\text{g}$; or (banana $100 \sim 120\text{g}$);
- Peanut oil ($10 \sim 15\%$), sunflower seed oil ($8 \sim 12\%$)

ARTWORK

Picture used for identifying taste/flavor is NOT emphasis

HOWEVER: It is not permitted to use any real picture of relevant raw materials or food for any taste prepared with their fragrance



“concentrated puree of **fruit-taste** puree beverage”



“seafood powder – condiment”

Open issue: What about food that use both original ingredient AND fragrance?

NEGATIVE CLAIMS

Unless otherwise regulated, “no” (“无”) claims:

- shall mean absolute “0”;
- **are not allowed for food additives (“食品添加剂”), contaminants (“污染物”), and substances not allowed to be added in food (“不允许添加的物质”)**

Unless regulated, “without addition of” (“不添加”) claims may not be used.

Open issue: not always clear when negative claim is allowed and when not



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NEGATIVE CLAIMS SYNONIMS

“No” (“无”) claims include also “without” (“不含”), “zero (0)” “零 (0)”, “does not have” (“没有”), or “100% free of” (“100%不含”) etc..

“Without addition of” (“不添加”) claims include also “no use of” (“不使用”), “without added” (“未添加”), “without using” (“未使用”), “no ... added” (“没加”), “no addition of” (“不加”), “no ...used” (“没用”), etc..



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ALLERGENIC INGREDIENTS

Mandatory labeling for any food/ingredient containing:

- Gluten-containing grains and their products (e.g., wheat, rye, barley, oats, spelt wheat, or their hybrids);
- Crustaceans and their products (e.g., shrimp, lobster, crab, etc.);
- Fishes and their products;
- Eggs and their products;
- Peanuts and their products;
- Soybeans and their products;
- Milk and milk products (including lactose);
- Nuts and their kernel products;

Labeling is not mandatory in case of:

- **Other allergenic substances**
- **only potential cross-contamination risk**
- **use of only non-protein components of the above foods**



ALLERGENIC INGREDIENTS – how to label#1

Within ingredient list, with graphic emphasis (including but not limited to boldface characters, underlines or other prominent signs)

- Ingredients: wheat powder, mixed sesame paste (**including peanut paste**), white granulated sugar, salt, vitamin E;
- Ingredients: water, whole milk powder, cream, edible vegetable oil, chocolate (cocoa liquor, white granulated sugar, cocoa butter, phospholipid, polyglycerol ricinoleate, edible fragrance, tartrazine), peanut, glucose syrup, propylene glycol fatty acid ester, carrageenan, guar gum, annatto, maltodextrin, edible flavoring;
- Ingredients: wheat powder, white granulated sugar, hazelnut paste (*hazelnut*, chocolate).

ALLERGENIC INGREDIENTS – how to label#2

Out of the ingredient list, with specific declaration introduced by “food allergen reminder”, “reminder of allergenic substances”, “allergen information”, or equivalent:

- With egg, peanut, nut, milk components
- With peanut paste
- This product contains fish and soybean components
- This product contains fish and soybean components, and may cause food allergy



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ALLERGENIC INGREDIENTS – how to label#3

If only potential risk of cross-contamination with allergenic substances, labeling is **voluntary** (both next to the list of ingredients or other in positions):

- “This product may contain...;”
- “Probably with...;”
- “Probably with a little...;”
- “This manufacturing equipment also processes food with...;”
- “This production line also processes food with...”



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NEW DRAFT GB 28050 – NUTRITIONAL LABELLING



BACKGROUND – drafting process

March 2017 - May 2018:

- 7 working group meetings
- 4 external experts and enterprise seminars;
- 3 special meetings on NRV, serving size and other topics
- 1 international exchange meetings (Italy).

Research phase	Questionnaires with requests of recommendation sent to enterprises, more than 90 feedbacks
Revision phase	<p>May 2017: working groups began activity</p> <p>July 2017: first draft completed. Seminar on the revision to more than 20 professional institutions</p> <p>April-October 2017: in-depth research of the revised values of NRVs was conducted.</p> <p>October 2017 - early 2018: two large-scale consultation meetings, and formulation of the food portion was finally completed</p>
Consultation and improvement phase	<p>3 enterprise-opinion-consultation meetings were held.</p> <p>October 2017: the revision working group integrated the above meeting feedbacks and held a enterprise opinion consultation meeting in Wuxi.</p> <p>November 2017 and March 2018: a large-scale conference was held to consult with the competent departments of enterprises and related associations.</p> <p>December 2017 and April 2018: the meeting on the final revision of the General Regulations was held.</p>

BACKGROUND – involved players



中国营养学会
Chinese Nutrition Society



**中国疾病预防控制中心
营养与健康所**
National Institute for Nutrition and Health
Chinese Center for Disease Control and Prevention



国家食品安全风险评估中心
China National Center for Food Safety Risk Assessment



深圳市标准技术研究院
SIST Shenzhen Institute of Standards and Technology



国家级上海产品质量监督检验研究院
National Institute of Quality Inspection and Research on Product in Shanghai
上海市质量监督检验技术研究院
Shanghai Institute of Quality Inspection and Technical Research



北京市营养源研究所
BEIJING INSTITUTE OF NUTRITIONAL RESOURCES



浙江省疾病预防控制中心
ZHEJIANG PROVINCIAL CENTER FOR DISEASE CONTROL AND PREVENTION

Chinese Nutrition Society
<http://www.cnsoc.org/>

National Institute for Nutrition and Health, Chinese Center for Disease Control and Prevention,
<http://www.chinanutri.cn/>

China National Center for Food Safety Risk Assessment
<http://www.cfsa.net.cn/>

Shenzhen Institute of Standards and Technology
<http://www.sist.org.cn/>

Shanghai Institute of Quality Inspection and Technical Research
http://www.sqi.com.cn/SQI_Web_new/index.html

Beijing Institute of Nutritional Sources
<http://www.nutrisources.com/>

Zhejiang Provincial Center for Disease Control and Prevention
<http://www.cdc.zj.cn/>

APPLICATION SCOPE

Applies to prepackaged foods that are **directly supplied to consumers**.

Does not apply to health food or for pre-packaged food for special dietary uses.

EXEMPTIONS*:

- Fresh food, such as packed raw meat, raw fish, raw vegetables and fruits, fresh eggs, etc;
- **Raw dry products that are subject to simple cutting or cleaning;**
- Alcohol beverages $\geq 0.5\%$ of alcohol content;
- Packaged food with total surface area $\leq 100\ 120$ cm² or largest surface area $\leq 20\text{-}25$ cm²;
- Food sold on the site which is usually bought for immediate consumption;
- Bottled drinking water;
- **Foods packaged in re-usable glass (porcelain) bottles and label information cannot be printed on the bottle;**
- Prepackaged food that the daily intake amount shall be no more than 10g or 10ml.

**unless any nutritional information/claim is provided on their packaging*

Open issue: *What about prepackaged food NOT directly supplied to consumers?*

MANDATORY CONTENT

- Energy
- Protein
- Fats
- Saturated Fats**
- Carbohydrates
- Sugar**
- Sodium
- Vitamin A**
- Calcium**
- NRV%
- Any other claimed nutrient
- Any nutrition fortifiers

USE OF GRAPHICS

- **Use of graphics and other information on the front of the package to supplement the nutrition list is encouraged**
- When the food fat, sodium and sugar content requirements meet T/CNSS 001-2018, the “health selection” logo can be used
- Enterprises encouraged to promote key content of “Chinese dietary pagoda” and “Chinese dietary guidelines”.

Open issue: not clear what is T/CNSS 001-2018



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NUTRITIONAL PAGODA



中国居民平衡膳食宝塔 (2016)



盐 <6克
油 25~30克

奶及奶制品 300克
大豆及坚果类 25~35克

畜禽肉 40~75克
水产品 40~75克
蛋类 40~50克

蔬菜类 300~500克
水果类 200~350克

谷薯类 250~400克
全谷物和杂豆 50~150克
薯类 50~100克

水 1500~1700毫升

每天活动6000步



DIETARY GUIDELINES

Key recommendation of “Chinese dietary guidelines” include (amongst others):

- *Daily meals should include cereal and tubers, fruits and vegetables, meat, eggs and dairy, soy and nuts etc.*
- *Eat 250g ~400g of cereal and tubers every day, including whole-grain and soy 50g-150g, tubers 50g-100g*
- *Vegetables and fruit are the key components of a balanced diet, dairy is rich in calcium and soy is rich in good quality protein*

SERVING SIZE REFERENCE

- “Serving” is optional reference for the amount of nutrient
- When referring to “serving”, the amount of each serving should be indicated.
- Serving Size Reference (**SSR**) is provided in Annex E for specific foods
- For foods not included in Annex E, **SSR** can be calculated according to the characteristics of the product

SERVING SIZE REFERENCE – HOW TO DECLARE

- **Minimum food unit matches SSR**

Serving size can float 50%-150% of SSR

Example: chocolate SSR = 10g. Serving Size can be between 5g-15g

- **Minimum food unit < 50% of SSR**

Serving size may be the sum of several minimum units.

Example: biscuits SSR = 30g; each biscuit is 10g; then, 3 biscuits can be used as one serving, which is labeled as “30g/3 pieces each serving”

- **150% SSR < minimum food unit < 300% SSR**

Serving size may be 1/2 or 1/3 of SSR

- **Minimum food unit > 300% SSR and food to be divided**

cake/breakfast cereal: SSR can be used as serving size

DEFINITION OF '0'

ITEM	NEW DRAFT	CURRENT VALUE
Energy	≤17kJ or ≤ 4kcal	≤17kJ
n-3 polyunsaturated fats	≤20mg	-
α-linoleic acid	≤5mg	-
EPA	≤5mg	-
DHA	≤5mg	-
Vitamin A	≤10µgRAE	≤8µgRAE
Vitamin E	≤0.20mg a-TE	≤0.28mg a-TE
Vitamin B12	≤0.1µg	≤0.05µg
Niacin	≤0.2mg	≤0.28mg



ALLOWED ERROR MARGIN

NUTRIENTS IN FOODS	ALLOWED ERROR RANGE
Protein, Polyunsaturated fat (fatty acid), Monounsaturated fat (fatty acid), Carbohydrates, lactose, Total dietary fiber, soluble dietary fiber, insoluble dietary fiber, monomer component of fiber, Vitamins (including Vitamin D and Vitamin A), Minerals (except Sodium) , other nutrients fortifiers	≥80% declared value
Energy, Fat, Saturated fat (fatty acid), Trans fat (fatty acids), Cholesterol, Sodium, Sugars in food	≤120% declared value
Vitamin D and Vitamin A in food	80% ~ 180% declared value



FUNCTION CLAIMS

Protein

Protein is the main component of body and could provide various kinds of amino acids. Protein is essential to human life activities, as well as contributing to tissue formation and growth.

Proteins help constituting or repairing of human tissue.

Proteins contribute to tissue formation and growth.

Protein is the main nutrient for tissue formation and growth.

Protein helps muscle growth and maintenance.

Protein is required for the normal growth and development of childhood bone marrow.



FUNCTION CLAIMS

Trans fatty acids

Intake of trans fatty acid should be less than 2.2g everyday.

Intake of trans fatty acids should be less than 1% of total energy every day.

Excessive intake of trans fatty acids will do harm to health.

Excessive intake of trans fatty acids increases the risk of cardiovascular disease.

α - Linoleic acid

α - linolenic acid is an essential fatty acid.

Carbohydrate

Carbohydrate is a basic compound for human life, also the main source of energy.

Carbohydrate is the main source of energy for human.

Carbohydrate is the main source for blood sugar formation.

~~Carbohydrate should take about 60% of total energy in diet.~~

FUNCTION CLAIMS

Vitamin A

Vitamin A helps maintain the scotopic vision.

Vitamin A helps maintain the health of skin and mucosa.

Vitamin A helps maintain normal vision.

Vitamin A helps maintain the normal physiological function of the immune system.

Vitamin D

~~Vitamin D facilitates the absorption of calcium.~~

Vitamin D helps maintain the health of bone and tooth.

Vitamin D helps the formation of bone.

Vitamin D promotes the absorption and utilization of calcium and phosphorus.



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FUNCTION CLAIMS

Vitamin B6

Vitamin B6 helps the metabolism and use of protein.

Vitamin B6 contributes to normal energy metabolism.

Vitamin B6 helps maintain the normal physiological function of the nervous system.

Vitamin B12

Vitamin B12 helps the formation of RBC.

Vitamin B12 contributes to normal energy metabolism

Vitamin B12 helps maintain the normal physiological function of the nervous system.



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FUNCTION CLAIMS

Folic acid

Folic acid helps the growth of brain and neural system for embryo.

Folic acid helps the formation of RBC.

~~Folic acid helps the growth of embryo.~~

Niacin

Niacin helps maintain the health of skin and mucosa.

Niacin is an essential component for energy metabolism.

Niacin helps maintain ~~the health of nervous system~~ **normal physiological function of the nervous system.**

Biotin

Biotin helps maintain skin and hair health

Choline

Choline is an important component involved in lipid metabolism.

FUNCTION CLAIMS

Calcium

Calcium is the main component for human bone and tooth, also participating many of the physiological function.

Calcium is the main component for bone and tooth, and maintains bone density.

Calcium helps the growth of bone and tooth.

Calcium makes the bone and tooth more firm.

Calcium is required for normal nerve and muscle function.

Phosphorus

Phosphorus helps maintain the normal function of the cell membrane.

Phosphorus helps maintain bones and teeth health.

Potassium

Potassium is an essential element in maintaining the balance of water and electrolytes.

Potassium helps maintain normal muscle function.

FUNCTION CLAIMS

Magnesium

Magnesium is essential for energy metabolism, tissue formation and bone growth.

Magnesium helps maintain normal muscle function.

Zinc

Zinc is essential element for children growth.

Zinc helps improve of appetite.

Zinc helps maintain the health of skin.

Zinc is an important component of energy metabolism and tissue formation.

Zinc helps maintain the normal physiological function of the immune system.

Iodine

Iodine is essential for natural function of hypothyroid.

Iodine is required for the development of the nervous system.

Selenium

Selenium has an antioxidant effect.

Selenium helps to maintain normal physiological function of the immune system.