



香港食品, 飲料及雜貨協會

**THE HONG KONG FOOD
DRINK & GROCERY ASSOCIATION**

GPO BOX 8689, HONG KONG TEL: 2923 8419 FAX: 2576 1559

26th March 2012

BY FAX & MAIL

Risk Assessment Section
Centre for Food Safety
Food and Environmental Hygiene Department
43/F Queensway Government Offices
66 Queensway
Hong Kong
Attn: Consultation on draft Trade Guidelines on Preparation of Legible Food Label
Facsimile: (852) 2893 3547

Dear Sir/ Madam,

Comments on the Proposed Trade Guidelines on
Preparation Of Legible Food Label

The Hong Kong Food, Drink & Grocery Association (FDGA) is an industry issues driven association. The FDGA was founded more than 30 years ago and is well recognized by the industry, Government and other stakeholders. It is an independent mouthpiece for its members, more than 42 companies (See Appendix 1) to address common issues.

The FDGA was established to provide a forum for companies active in manufacturing, importing, marketing and distribution of branded food, drink or grocery products in Hong Kong. Members of the FDGA meet together, review and discuss industry issues and concerns, decide on action where necessary and communicate with the media, industry or Government on these issues.

The Centre for Food Safety (CFS) has proposed a set of trade guidelines to provide principles of a "legible" Food Label, which tends to increase the size of the Food Label and the stickers on many import packaging.

Food Labels are a major method for communicating with consumers on information about our food products; however the size and layout of the Food Label should be appropriate to perform its function, without creating any adverse impact on the product. In principle, the FDGA agrees with the Administration that the content of the Food Label should be easy to read and legible to most citizen of Hong Kong.

The FDGA would like to recommend striking a better balance as we believe some of the CFS recommendations may not be practical.

Suitable font size

We concur that Food Label should be legible to most people with normal eyesight. Food Labels are important; packaging design and commercial information are equally important in making a purchase decision. The Food Label must not overwhelm other important elements of a commercial packaging.



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We are against a compulsory minimum font size of 8 point. If a compulsory 8 point font size is imposed on Food Label, useful commercial information for consumers to make a purchase choice may be significantly compromised.

The CFS has proposed 2.8mm in height (i.e. 8 point) in the trade guideline, which is found to be too big to apply in many packaging and contradicts to the common practice in the trade.

In fact, the minimum font size of 8 point was proposed by the Food Standard Agency (FSA) of UK in the "Food Labelling Clear Food Labeling Guidance" and was found to be impractical. During a research conducted by FSA in 2005, the findings indicated that 89% of the products surveyed failed to comply that they were using font size smaller than the recommended 8 point. During the consultation on the revised Guidance 2008, the food industry expressed concern about using a minimum font size of 8 point.

In 2009, FSA actually proposed to fine-tune the technical guidance by incorporating a suggestion for Front Of Panel (FOP) label design that scales in proportion with the size of the product. The minimum font size was revised to be 4 point, and 6 point font is suggested for product packs with dimensions of approx. 180mm x 150mm, 8 point font for 200mm x 200mm and 10 point font for 200mm x 300mm. This evidenced that a rigid 8 point font can hardly be practical to all products.

Bilingual label

Hong Kong is a cosmopolitan city and bilingual labels are necessary to cater for the different nationalities. This makes it more difficult for many consumer packaging to carry a food label with big font size as 8 point.

It is understood that Chinese characters are more complicated. Reference is thus taken from the China law under the General Standard for the labeling of Prepackage food that reads "Where the largest surface area of a package is more than 35 cm square (effective 20 April, 2102), minimum size of the words, symbols and numerals in the mandatory labelling information shall not be less than 1.8mm (~5 point) in height".

Size of Sticker Label should be minimized NOT maximized

In actual fact, we observe that the majority of the Hong Kong food suppliers have tried their best to ensure Food Labels are clear, prominent, indelible and readily legible by the consumers. In minimizing the size of the sticker label, the trade has opted for advance printing technology to reduce the font to 2 to 3 point, still highly legible. Labels are made of laminated paper with ink and glue. It is environmentally unfriendly. Minimizing sticker label helps conserve the environment. The effort from the food suppliers in protecting the environment should be respected. guideline.

Good contrast and enough spacing

The FDGA agrees that legibility of indications on the label is not determined by the font size alone, but use of typeface, contrast, colour and spacing. Thus, the trade needs to pay attention to all these elements in designing the Food Label.



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Proposals from FDGA

While hoping the government can trust and rely on the trade in developing effective Food Labels, we agree certain control is to be exerted to regulate honest practice. We suggest CFS to work with the trade closely in developing a set of guideline for Eligible Food Label. In doing so, CFS must take into two important considerations:

- Practicality of font size requirement relative to pack size as stated in above mentioned for UK and for China.
- Bilingual requirements should be taken into consideration that the font size requirement should be no bigger or smaller than those of UK and China.

The FDGA also encourages members to establish and maintain a customer service hotline and web site, which will supplement the constraint of the Food Label in answering consumers' queries.

As a leading association, the FDGA would welcome the opportunity to work with government to come to a workable solution that protects Hong Kong consumers in a manner that the industry can practically implement.

Thank you for your attention.

Kindest Regards

Michael Glover
Chairman of the FDGA



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Appendix A

MEMBERSHIP LIST

Advantage Asia Pacific Ltd	Executive Committee Member
Anheuser-Busch HK Trading Co Ltd	
Anrise-IMC Ltd	Executive Committee Member
Antique Wine Company, The	
Asia Provisions Co Ltd, The	
Bacardi-Martini Asia Pacific Ltd	
Berry Bros. & Rudd HK	
Blueriver Ltd	
Brown-Forman Worldwide, L.L.C.	
Carlsberg HK Ltd	Executive Committee Member
Crown Wine Cellars Ltd	
Diageo RTD Hong Kong Ltd	
Diversified Events HK, L.L.C.	
DKSH HK Ltd	
Dynasty Fine Wines Group Ltd	
FrieslandCampina (HK) Ltd	
Golden Gate Wine Co Ltd	
Handpicked Wines (HK) Ltd	
Heineken HK Ltd	Executive Committee Member
HK Beverage Association Ltd, The	Executive Committee Member
HK Wine Merchants' Chamber of Commerce	
Jebsen Beverage Company Limited	Chairman
Kjeldsen & Co (HK) Ltd	
Leung Yick Co Ltd	
Maxxium HK Ltd	
MC Marketing & Sales (HK) Ltd	
Moët Hennessy Diageo HK Ltd	Honorary Secretary
Molson Coors Brewing International L.L.C.	
Nestle HK Ltd	
Neukon Holdings (HK) Ltd	
Omtis Ltd	
Pernod Ricard HK Ltd	Executive Committee Member
Ponti Trading Ltd	
Remy Cointreau Asia	
SAB Miller Asia	
San Miguel Brewery HK Ltd	Executive Committee Member
Sims Trading Company Ltd	Honorary Treasurer
Sinolink Fine Wines Ltd	
Telford International Co Ltd	
Tsingtao Beer (HK) Trading Co Ltd	
Watson's Wine Cellar	
Wing Hing Group	
Total: 42 Member Companies (updated on 24 February 2012)	