

FRONT-OF-PACK LABELLING

How do I apply them in Asia?



Front-of-pack (FOP) labelling comes in various forms and in various countries across Asia. A form of nutrition labelling, FOP labelling is designed to reinforce nutrition guidance by simplifying the nutrition information and displaying it at a prominent area on the packaging. This is aimed at allowing consumers to make healthier food choices, which lowers their risks of non-communicable diseases (NCDs). In an attempt to ensure the effectiveness of FOP labels globally, three varieties of FOP labels – food group information labels, fact-based labels and interpretive logos are developed and applied to various products on a voluntary or mandatory basis. In some cases, two or more labels are shown on the same product.

ASIA AT A GLANCE

Type of FOP Labels Implemented (V – Voluntary M – Mandatory)			
Fact-based (GDA Labels– monochrome)	Fact-based (GDA Labels– colour-coded)	Interpretive Logo (Algorithm-based)	Interpretive Logo (Threshold-based)

열량	탄수화물	단백질	지방	포화지방	포화지방	포화지방	단백질
000	00%	00%	00%	00%	00%	00%	00%
kcal	00g	00g	00g	00g	00g	00g	00g

영양성분 표시기준에 따른 제품 표시는 100g/ml 기준으로 표시된 값에 따라 표시하여야 합니다.

Korea (V)

Philippines (V)

每份 (120公克)	热量	饱和脂肪	糖	钠	膳食纤维	钙
	500大卡	18公克	15公克	1000毫克	5公克	240毫克
	25%	100%		50%	25%	20%

% : 每日参考值百分比

Taiwan (V)

Nutritional value per.....			
Should divide to eat.....times			
Energy	Sugar	Fat	Sodium
.....
kilocalorie	gram	gram	milligram
.....

*calculate as percentage of maximum intake per day

Thailand (M)

당류	지방	포화지방	나트륨
00g	00g	00g	00mg
00%	00%	00%	00%

00% 00% 00% 00%

당류	지방	포화지방	나트륨
00g	00g	00g	00mg
00%	00%	00%	00%

Korea (V)

Brunei (V)

Malaysia (V)

Singapore (V)

Thailand (V)

Hong Kong (V)

Sri Lanka (M)

INTRODUCTION

When it comes to the success of nutrition policies, the ultimate goal is that consumers are “buying into” the policy and using the established labels in this case. Success of implementation and adoption of the FOP labels can be broken down into intermediate stages as follows:

- Whether there is any nutrition guidance available to consumers (Accessibility)
- Whether consumers can understand what it is (Cognition)
- Whether consumers want to use it (Attitude)
- Whether use of the implemented nutrition guidance can be sustained (Behaviour)

Due to factors such as literacy level of people, cultural differences, nutritional status and food affordability in different societies, regions and countries, the introduction of different FOP nutrition schemes globally becomes apparent. In order to ensure the same goal is achieved, education and consumers’ perceptions should be taken into consideration. While the initiative is aimed at increasing consumers’ health protection, successful FOP labels should also minimise trade barriers.

INTERNATIONAL IMPLEMENTATIONS

On 14 May 2019, the World Health Organisation (WHO) released a draft guidance framework manual on the *WHO Guiding Principles and Framework Manual for FOP Labelling for Promoting Healthy Diets* to serve as a tool for countries to implement FOP labelling systems. The tool is being field-tested and has not officially been released.

Codex Alimentarius has also tasked the Codex Committee on Food Labelling (CCFL) to look at the development of FOP nutrition labelling guidelines through an electronic working group (eWG) chaired and co-chaired by representatives of Costa Rica and New Zealand since 2017.

Globally, there is no single FOP label scheme that has been recognised. In North America, Grocery Manufacturers Association (GMA) in the United States (US) implemented voluntary monochrome GDA labels, while Canada has proposed mandatory warning labels with regard to high sodium, sugar and saturated fat. In South America, all three countries Chile, Ecuador and Peru that implemented variants of interpretive warning logos as their FOP labels.

In Europe, France has implemented an algorithm-based interpretive logo called Nutri-score while the United Kingdom (UK) has implemented a voluntary colour-coded GDA label. In Australia-New Zealand (ANZ), a voluntary algorithm-based interpretive logo called the Health-star Rating (HSR) and GDA monochrome label are being developed. In 2017, ANZ proposed a mandatory warning label regarding the amount and type of sugars contained in packaged foods and drinks.



SCHEMES IMPLEMENTED IN ASIA



In Asia, healthier choice logo / symbol, the most common interpretive logos and Guideline Daily Amounts (GDA) label, the most common fact-based label, are two types of FOP labels that are commonly adopted.



Brunei, Malaysia, Singapore and Thailand have implemented the use of healthier choice logo / symbol, with varying requirements and designs.

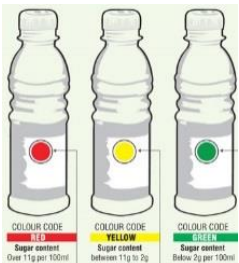
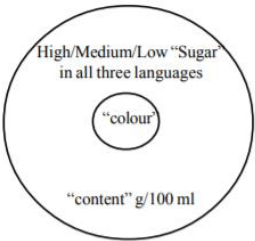


On the other hand, Korea, Philippines, Taiwan and Thailand have introduced different forms of GDA labels. At present, monochrome GDA label are used in these countries. In addition, Korea has a colour-coded GDA label scheme called Traffic Light Labels (TLL) for children's foods determined to be frequently consumed by them, aside having a monochrome GDA label intended for display on foods for the general population.

Apart from the two types of FOP labelling, there are slight variances as seen in Hong Kong and Sri Lanka. In Hong Kong, FOP label is focused on salt and sugar reduction, with implementation of voluntary low or no salt / sugar interpretive logos. In Sri Lanka, there are two types of FOP labels, one being the colour-coded label for sugar levels implemented in 2016 and a second one being red warning / interpretive logos for high salt, sugar and fat implemented in August 2018.

Country	Label	Labelling Requirements
Brunei [Nutrient Criteria Feb 2017]	Healthier Choice Logo (V) 	<p>Healthier Choice logo is applicable for identified food products belonging to the following food groups:</p> <ul style="list-style-type: none"> • Beverages • Cereals • Dairy Products • Eggs and Egg Products • Fats and Oils • Fruits and Vegetables • Legumes, Nuts and Seeds • Meat and Poultry • Seafood • Sauces, Soups and Recipe Mixes • Snacks • Table Salt • Miscellaneous <p>To qualify for the logo and nutrition claim on packaging, specific nutrient criteria have to be met. No minimum size of logo is established.</p>
Hong Kong [Salt/Sugar Label Scheme Aug 2018]	"Low In / No" Salt & Sugar Labels (V) 	<p>These logos can be used on any prepackaged food falling within the definition of "low salt", "no salt", "low sugar" and "no sugar" under the Food and Drugs (Composition and Labelling) Regulations (Cap. 132 W) as follows:</p> <p><i>Low Salt – not more than 0.12 g of sodium per 100 g or mL of food</i></p> <p><i>No Salt – not more than 0.005 g of sodium per 100 g or mL of food</i></p> <p><i>Low Sugar – not more than 5 g of sugars per 100 g or ml of food</i></p> <p><i>No Sugar – not more than 0.5 g of sugars per 100 g or ml of food</i></p>

		<p>Can be presented in 3 language versions – Chinese, English, Bilingual in either specified colour or black-and-white version.</p> <p>Use of the logos only requires notification to the CFS and does not require prior approval from CFS.</p>
<p>Korea [Food Labelling Standards (MFDS Notice No. 2017-99)]</p>	<p>Monochrome GDA Labels (V)</p> 	<p>The GDA label to be shown on the principal display panel should display the values of energy (calories), sodium, carbohydrates, sugars, fat, trans fat, saturated fat, cholesterol and protein (in sequence) below their corresponding % RDI values, which are based on 2,000 kcal calorie diet of an adult in a day, which may vary according to individual (except sugars and trans fat which have no RDI values).</p> <p>The values of the nutrients can be declared based on one of the three formats – total content of the prepackaged food, per 100 g or ml, or per serving (per unit), and an indication of the format of declaration should be given above the GDA label.</p> <p>The font size for the name of nutrients, % RDI and nutrition content shall be at least 10 point. The font size of the % RDI should be the same or bigger than the naming of nutrients or calories and the % RDI value should be rounded up to the nearest % (no decimal point). In addition, the value and unit (kcal) for calories should be displayed in bold.</p>
<p>[Article 12]</p>	<p>Traffic Light Labels (V)</p> 	<p>Under Article 12 of the Special Act on Safety Control of Children's Dietary Lifestyle, labelling of the contents of fat, saturated fat, sugar, sodium and other nutrients found in the products may be graded as 'high', 'medium' or 'low' based on the quantity of the nutrient. The colour 'red' (high), 'yellow' (medium) and 'green' (low) will be assigned to each nutrient according to the grade received for the easy recognition of children.</p>
<p>Malaysia [Nutrient Criteria Apr 2017]</p>	<p>Healthier Choice Logo (HCL) – (V)</p> 	<p>Food products that can qualify for the logo are organised and listed under the corresponding food groups below with specific nutrient criteria:</p> <ul style="list-style-type: none"> • Beverages • Cereals • Dairy and Dairy Products • Fats and Oils • Fish and Fish Products • Fruits and Vegetables • Meat and Poultry • Soups, Sauces & Recipe Mixes

		<p>Minimum size is 15mm but size of the HCL should not exceed 5% of the display surface area of the packaging.</p> <p>There should not be more than two HCL printed on the single product label.</p>
Philippines	<p>Monochrome GDA Label for Calories Only (V)</p> 	<p>Declaration is required on the total amount of energy / calories and the corresponding % Recommended Energy and Nutrient Intake (% RENI) based on per serving of a food within a cylindrical figure.</p>
<p>Singapore</p> <p>[Guideline Jan 2018]</p>	<p>HCS with Comparative Claims (M)</p> 	<p>HCS is applicable for identified food products belonging to the following food groups:</p> <ul style="list-style-type: none"> • Beverages • Cereals • Dairy Products • Eggs and Egg Products • Fats and Oils • Fruits and Vegetables • Legumes, Nuts and Seeds • Meat and Poultry • Seafood • Sauces, Soups and Recipe Mixes • Snacks • Convenience Meals • Desserts • Miscellaneous <p>To qualify for HCS, specific nutrient criteria have to be met. No minimum size of HCS is established.</p> <p>The logo must be accompanied by the following statements:</p> <ul style="list-style-type: none"> • lower in sugar • lower in sodium • lower in saturated fat • higher in wholegrains • higher in calcium

<p>Sri Lanka [Food Colour Coding for Sugar Levels Regulations – 2016]</p>	<p>Traffic Light Label Indication for Sugar Content in Selected Beverages (M)</p>  	<p>The colour-coded GDA labelling is required for identified beverages as follows:</p> <ul style="list-style-type: none"> Carbonated beverages Ready-to-serve beverages (other than milk-based products) Fruit nectar Fruit juices <p>The criteria for labelling of these products are as follows:</p> <table border="1"> <thead> <tr> <th>Column 1 Sugar Content (per 100 ml)</th><th>Column 2 Relative Sugar Level</th><th>Column 3 Colour Code</th></tr> </thead> <tbody> <tr> <td>More than 11g</td><td>High Sugar</td><td>Red</td></tr> <tr> <td>2g to 11g</td><td>Medium Sugar</td><td>Amber</td></tr> <tr> <td>Less than 2g</td><td>Low Sugar</td><td>Green</td></tr> </tbody> </table> <p>The diameter of the inner circle in the logo which indicates the colour relating to particular sugar level, shall not be less than 1 cm. The font size within the logo shall bear a minimum height of 1.5mm and be legible.</p>	Column 1 Sugar Content (per 100 ml)	Column 2 Relative Sugar Level	Column 3 Colour Code	More than 11g	High Sugar	Red	2g to 11g	Medium Sugar	Amber	Less than 2g	Low Sugar	Green
Column 1 Sugar Content (per 100 ml)	Column 2 Relative Sugar Level	Column 3 Colour Code												
More than 11g	High Sugar	Red												
2g to 11g	Medium Sugar	Amber												
Less than 2g	Low Sugar	Green												
<p>Taiwan [Finalised FOP Nutrition Labelling Guidelines]</p>	<p>Monochrome GDA Label (V)</p>  <p>%：每日參考值百分比</p>	<p>The monochrome GDA label can presented in one of the following ways:</p> <ul style="list-style-type: none"> Labelling of calories only; Labelling of calories, saturated fat, sugar, and sodium; or Labelling of calories, saturated fat, sugar, sodium, and a maximum of 2 other nutrients. <p>These labels shall include the amount of nutrients and their corresponding percentage daily value, where applicable. The font size in the label shall not be less than 2 mm, with the exception of small packages (maximum surface area of less than 80 sq.cm), and for such small packages, the font size used may be less than 2 mm.</p>												
<p>Thailand [Notification Issue 394 (BE 2561) Oct 2018]</p>	<p>Monochrome GDA Label (M)</p> <p>Nutritional value per..... Consumption should be split intotimes.</p>  <p>*Percentage of maximum consumption volume allowed per day</p>	<p>Mandatory GDA labelling is required for identified food products belonging to the following food categories:</p> <ul style="list-style-type: none"> Snack foods Chocolate and chocolate flavoured confectionery Bakery products Semi-processed foods 												

		<ul style="list-style-type: none"> • Chilled and frozen ready- to- eat meals • Beverages • Ready-to-drink tea in dry or liquid form • Ready-to-drink coffee in dry or liquid form • Flavoured milk • Fermented milk • Other milk products • Soy bean beverage • Ready-to-eat ice cream <p>The GDA label should display energy (calories), fat, sodium and sugar and their corresponding % GDA values.</p> <p>All beverages categories that are either packed in returnable bottle or ready-to-consume packs with less than 65 sq.cm front label area are exempted from GDA labelling. Multi-pack and co-pack foods with the front-of-pack label area of individual unit smaller than 65 sq.cm can be labelled “calculation is based on amount of individual unit.”, in addition to showing the GDA labels on the main panel of the outer package of the multi-pack foods.</p>
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SCHEMES IN DISCUSSIONS



Figure 21. China's Healthier Choice logos

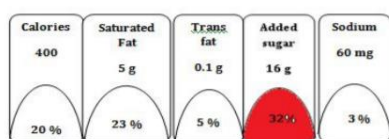
China's Draft Smart choice and healthier choice logos¹

In October 2017, the Chinese Nutrition Society launched its own Healthier Choice programme as a voluntary labelling initiative based on an NP model and implementation plan largely aligned with the Choices criteria and approach. For pre-packaged products to qualify for the Healthier Choice or Smart Choice logos, they must meet the criteria set out for fat, sugar and salt limits on the Pre-Packaged Food Healthier Choice Logo Implementation Guideline (Trial)². Beverages, instant noodles, cakes and pastries, puffed snack products, jelly and pastes are allowed to carry the Smart Choice logos while any other food products are allowed to carry the Healthier Choice logos.

¹ China Launches Positive Front of Pack Logo. (2017). Retrieved from: <https://www.choicesprogramme.org/news-updates/news/china-launches-positive-front-of-pack-logo/>.

² Pre-Packaged Food Healthier Choice Logo Implementation Guideline (Trial). Chinese Nutrition Society and National Institute for Nutrition and Health, Chinese Center for Disease Control and Prevention. (n.d.). Retrieved from: <https://foodindustry.asia/documentdownload.axd?documentresourceid=28876>.

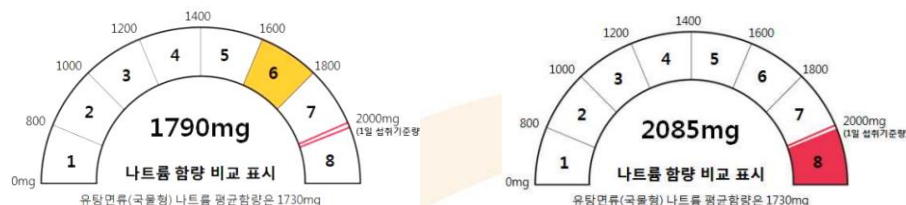
India's Draft Mandatory Colour-Coded GDA Label³



In April 2018, India proposed a draft colour-coded GDA label for foods intended for the general population that requires indication of the % RDA for Calories, Saturated Fat, Trans Fat, Added Sugar and Salt. The draft regulation specifies that the blocks of nutrient(s) for “High Fat, Sugar and Salt” food shall be coloured in “Red” (Fig. 24) when:

- The value of energy (kilocalories) from added sugar is more than 10 percent of the total energy (kilocalories) provided by 100 grams or 100 millilitres of the product;
- The value of energy (kilocalories) from trans-fat is more than 1 percent of the total energy (kilocalories) provided by 100 grams or 100 millilitres of the product; and
- Saturated fat or sodium content provided by 100 grams or 100 millilitres of the product is more than the threshold values as specified in Schedule – I of the draft regulation.

Korea's Traffic Light Warning Label for Salt Content⁴



In January 2019, MFDS of Korea issued a Notice regarding the amendment plan for labelling of sodium content using illustrative method (as shown above). There are 8 groups of sodium content, ranging from 0 – 800, 800 – 1000, 1000 – 1200, 1200 – 1400, 1400 – 1600, 1600 – 1800, 1800 – 2000 and above 2000. Label using a yellow colour is required for sodium content below 2,000 mg while label using a red colour is required for sodium content above 2,000 mg. The proposed minimum font size for the numbers presented in the label should be 6-point and above, while the indication number (1 to 8) shall be at least 7-point.

Sri Lanka's 'High-in' Red Warning Labels for Beverages and Foods (Mandatory)⁵



Nutrient	For solid foods	For liquid foods
Total sugar	More than 22g/100g	More than 8g/100mL

³ Draft Notification on Food Safety and Standards (Labelling and Display) Regulation, 2019. FSSAI. (2019). Retrieved from: https://fssai.gov.in/upload/uploadfiles/files/Draft_Notification_Display_Labelling_02_07_2019.pdf

⁴ FOP Label for Sodium Comparison. Ministry of Food and Drug Safety. 2019. Retrieved from: https://members.wto.org/cnattachments/2019/TBT/KOR/19_0143_00_x.pdf

⁵ Food Act, No. 26 of 1980 – Food (Colour Coding for Sugar, Salt and Fat) Regulations 2018. The Gazette of the Democratic Socialist Republic of Sri Lanka. (2018). Retrieved from: <https://foodindustry.asia/documentdownload.axd?documentresourceid=30639>.

Total salt	More than 1.5g/100g	More than 0.75g/100mL
Total fat	More than 17.5g/100g	More than 8.75g/100mL

Announced in August 2018, the new proposed colour-coded warning labels will be applicable for all pre-packaged foods (solid or semi-solid) and beverages, except pure fruit juices and fresh milk, and it is intended to replace the existing colour-coded FOP labels for use on beverage products. The labels will only be applicable for

these foods that are high in total sugar, total fat and total salt.

The warning label will be in red colour and will include the following words: “High Sugar” (Fig. 31a), “High Salt” (Fig. 31b) and “High Fat” (Fig. 31c) for products that exceed the thresholds specified in the table below.

FAQs

1. Are companies allowed to use a combination of two FOP labels of different types on their food products for export into an Asia country?

Companies shall first ensure that FOP labels that are mandatory in certain countries are labelled according to the requirements, before considering the use of additional FOP labels that are either allowed on a voluntary basis or not yet recognised.

Countries in Asia do not impose restrictions on the application of two or more different types of FOP labels. However, companies shall only use FOP label(s) that is/are recognised in the export country of interest. For instance, it is not appropriate and hence not allowed to display two “healthier choice logos”, one of which is from another country as this presents confusion to local consumers.

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