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**Report Name:** China Releases Draft General Standard for the Labelling of Prepackaged Foods for Domestic Comments

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**Report Highlights:**

On December 31, 2019, China released the draft General Standard for the Labelling of Prepackaged Foods (GB7718-xxxx) for domestic comments. We anticipate the draft revision to be notified to the WTO SPS Committee for WTO member comment in the near future. The General Standard for the Labelling of Prepackaged Foods (GB7718-2011), which is still in effect, was issued in April 2011, and came into force a year later. This report contains an unofficial translation of the draft standard.

## **Summary**

The General Standard for the Labelling of Prepackaged Foods (GB7718-2011), released in April 2011 and implemented a year later, is a mandatory national food safety standard that applies to the labelling of prepackaged foods of all categories. On December 31, 2019, China released a draft revision of GB7718-2011 for domestic comment. This report contains an unofficial translation of the draft standard.

The preface of this draft standard provides a detailed summary of the changes in the draft revision compared to the current standard GB7718-2011. One significant change is the addition of a section specific to the labelling of imported foods (Article 7). This article indicates that the Chinese labels on imported foods may be printed or pasted on the package. In addition, it allows for the adjustment of certain labelling items—for instance, the date of manufacture required on the Chinese label can be calculated based on the shelf life and best before date on the original label. Moreover, the article stipulates that imported food packages are not required to include food production licensing numbers.

Labelling errors have reportedly been the highest cause of non-compliance complaints submitted by Chinese consumers seeking monetary compensation under Chinese law. Therefore, food producers and traders of prepackaged foods should closely monitor the standard revision process, provide their comments on issues of interest, and ensure compliance with the final standard.

**BEGIN TRANSLATION**

## **National Food Safety Standard**

### **General Standard for the Labelling of Prepackaged Foods**

**(Draft for Comments)**

#### **Preface**

This standard replaces the *National Food Safety Standard - General Standard for the Labelling of Prepackaged Foods* (GB 7718-2011).

Compared with GB 7718-2011, main changes of this standard are as follows:

- Moves part of the text in the standard to the appendix, and adjusts the order of chapters;
- Modifies the definitions of prepackaged foods and configuration;
- Adds the definition of attribute name of foods, modifies the definition of shelf life, and deletes the definition of the principal display side;
- Makes further clarification of the declaration methods for food names;
- Modifies the declaration requirements for list of ingredients, makes further clarification of the declaration methods for food additives, modifies the declaration requirements for the class names of ingredients, and modifies the requirements for quantitative ingredients declaration;
- Modifies the requirements on the minimum height of characters, symbols and numbers in the mandatory declarations, as well as the requirements on the largest surface area of packages or containers;
- Modifies the declaration requirements for information of manufacturer and distributor;
- Modifies the declaration requirements for foods that contains allergens;
- Adds the declaration requirements for imported foods;
- Modifies the declaration requirements for genetically modified foods;
- Adds the new Appendix A “Requirements for the Use of Characters in Label of Prepackaged Foods and the Recommended Formats of Some Labelling Items”; merges the former Appendix C into the new Appendix A; changes the former Appendix A “Calculation Method for the Largest Surface Area of the Package or Container of Prepackaged Foods” to Appendix C, which further clarifies the calculation methods for the largest surface area of packages in irregular shapes; adds the Appendix D “Declaration Formats for the Quantitative Ingredients Declaration”, the Appendix E “Format for the Declaration of Allergens in Food”, and the Appendix F “Recommended Declaration Content”.

## **National Food Safety Standard -**

### **General Standard for the Labelling of Prepackaged Foods**

#### **1 Scope**

This standard applies to the labelling of prepackaged foods to be offered directly or indirectly as such to consumers.

This standard does not apply to the labelling of packages that provide protection to prepackaged foods during storage and transportation, nor does it apply to the labelling of foods in bulk or foods that are made and sold on the same spot.

#### **2 Terms and Definitions**

##### **2.1 Prepackaged Food**

Foods packaged or made up in a package and (or) a container, including foods packaged in advance with a pre-determined quantity, and foods made up with a pre-determined quantity in a package and container that have unified weight, volume and length within certain ranges; it also include foods packaged or made up in advance in a package and a container that are sold by weight.

##### **2.2 Food Label**

Any written, printed, graphic matter or other descriptive matter on food package or container.

##### **2.3 Attribute Name**

The special name reflecting the inherent or the explained characteristics of the food, which could fully describe the true attributes of the food. The attribute name may contain descriptions of one or more exclusive attributes of the food, such as characteristics of the ingredient, the production techniques, and the food category.

##### **2.4 Ingredients**

Any substance used in the manufacture or processing of a food, which presents in the product (including in a modified form), including food additives.

##### **2.5 Date of Manufacture**

The date on which the food becomes the finished product, including packaging and filling date; that is, the date the food is placed into (filled into) the package or container and becomes the final selling unit.

##### **2.6 Shelf life (Best Before Date)**

The date which signifies the end of the period under any stated storage conditions during which the product will retain qualities. During the period, the product will remain fully marketable and retain any specific qualities for which tacit or express claims have been made.

## **2.7 Configuration**

The descriptions of the relationship between net content and the units in the package when the package contains more than one unit of prepackaged foods with a pre-determined weight.

## **3 Basic requirements**

3.1 It shall comply with provisions by laws and regulations, and eligible food safety standards.

3.2 It shall be clear, prominent, lasting, and legible to customers in purchase. Food labels shall not be separated from the foods or their packages (containers).

3.3 It shall be easy to understand, and science-based; any indications, which are superstitious, pornographic, debasing other products, or unscientific, shall not be declared.

3.4 It shall be true and accurate; it shall not be false or exaggerating; it shall not use deceptive words, pictorials or symbols to introduce the food; it shall not create an erroneous impression by means of different font size or color contrast, which mislead consumers to confuse the purchased food or its certain property with any other product.

3.5 It shall not be expressed or implied by words, pictorial or symbols that the food, or certain content, or certain ingredient has the function of prevention or treating diseases; foods other than health foods shall not state or imply health functions.

3.6 It shall use standard Chinese characters (except for trademarks); the traditional Chinese characters, Chinese pinyin, characters of the ethnic minorities and foreign characters could be used at the same time. The use of traditional Chinese characters, Chinese pinyin, characters of the ethnic minorities and foreign characters shall comply with requirements in this standard, ensure the mandatory declaration information is consistent with the meaning of the standard Chinese characters (except the trademark, the name and address of the overseas distributor, and websites). The height of the characters and their use should follow provisions in Appendix A.

3.7 Where the package in a selling unit contains prepackaged foods of different kinds and in separate packages that can be sold respectively, each separate packages should be labelled. Where the mandatory declaration information on the inner package (or container) is legible through the outer wrapper, the same declaration information need not be repeated on the outer wrapper.

## **4 Labelling Content of Prepackaged Foods Directly Offered to Consumers**

### **4.1 General Provisions**

Label of prepackaged foods domestically produced, processed and distributed shall contain name of the food, list of ingredients, nutrition label, net content and configuration, manufacturer and/or distributor's name, address and contact information, date of manufacture and shelf life, storage conditions, food production licensing number, number of the implemented product standard, warning of allergens, and other necessary contents.

## **4.2 The name of the food**

4.2.1 The name of the food shall locate in the prominent place of the food label and shall clearly indicate the attribute name of the food.

4.2.1.1 Where a name or several names have been established or used for a food by a national standard, an industry standard, a local standard, or by a public notice of the health administrative department under the State Council, one of these names, or the name presenting the same meaning or with the same nature can be selected as the attribute name.

4.2.1.2 Where a national standard, an industry standard, a local standard, or public notice of the health administrative department under the State Council did not establish or use a name presenting the same meaning or with the same nature for a food product, a name which is not misleading or confusing to the consumer could be used, such as the "usual name" or the "common name" of the food.

4.2.2 When the attribute name of the product, due to the font size or the color of the characters, may mislead the consumer about the category of the food, the same font size, font and color shall be used to mark the attribute name of the food.

4.2.3 The "coined", "fanciful", "transliterated", "dialect" name, or "trademark name" of the food can be marked on the same display side of the attribute name at the same time. When such name contains characters or words that may mislead or confuse consumers about the food attribute, such characters or words shall be marked in font not taller than the attribute name, and in the same color of the attribute name.

4.2.4 Descriptive words about the food or its ingredients' status, production techniques or method, instructions for use or purpose of use, physical condition of the food, sensory, flavor, shape and other characteristics could be added before or after the food's attribute name.

## **4.3 List of ingredients**

4.3.1 A list of ingredients shall be declared on the label of prepackaged foods (including single-ingredient foods). Ingredients in the list of ingredients shall declare their attribute names; names of food additives should be declared following provisions in 4.3.1.4 of this standard.

4.3.2 The list of ingredients shall be headed or preceded by the word "Ingredients" or "List of Ingredients". If the raw materials used during processing have converted into other components, the word "Raw Materials" or "Raw Materials and Supplementary Materials" could be used to replace "Ingredients" and "List of Ingredients".

4.3.3 All ingredients shall be listed in descending order of ingoing volume (in terms of weight) at the time of the manufacture of the food; those ingredients with ingoing volume of less than 2% are not required to be listed in descending order. Ingredients volatilized or removed in the course of processing do not need to be declared in the list of ingredients.

4.3.4 Where an ingredient added directly to food is itself the product of two or more ingredients or raw materials (except blended food additives), name of the compound ingredient shall be declared in the list of ingredient, which is immediately accompanied by a list, in brackets, of its ingredients in descending order of ingoing volume.

4.3.4.1 Where all or part of the original ingredients in the compound ingredient are the same as other ingredients used directly in the food, such compound ingredient need not be declared; meanwhile, the relevant ingredients shall be combined and calculated, and declared in descending order based on their proportions in the finished product.

4.3.4.2 Where national, industry or local standard exists for a compound ingredients, and the ingoing volume of the compound ingredients constitutes less than 25% of the food weight, the original ingredients of the compound ingredients do not need to be declared.

4.3.5 Food additives and nutritional fortification substances shall be declared using their common names provided in the GB 2760<sup>1</sup>, GB 14880<sup>2</sup>, relevant public notices, or national food safety standards. Where ingredients can be used as food additives/nutritional fortification substances and as other ingredients, they should be declared according to their functions in the finished product. Processing aids and deactivated enzyme preparations need not be declared. Where food additives in a compound ingredient that constitute less than 25% of the food, if comply with Paragraph 1 of the carry-over principles in GB 2760, need not be declared.

4.3.5.1 Food additives could be declared using their common names; or categorize and declare common names of food additives, and declare the function class names of the food additives (please refer to Appendix B for declaration formats) at the same time. In label of one prepackaged food there shall only use one declaration format provided in the Appendix B (to declare food additives).

4.3.5.2 Where the common name and the function class name of a food additive are both declared, when the largest surface area of the package or container is less than 60 cm<sup>2</sup> (method for calculating the largest surface area is provided in Appendix C of the standard), the international numbering system (INS Number) of the food additive listed in GB 2760 could be used to substitute the common name of the food additive. Meanwhile, if a food additive does not have an international numbering, or declaring of allergens requires, the common name of the food additive could be declared.

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<sup>1</sup> National Food Safety Standard for Uses of Food Additives

<sup>2</sup> National Food Safety Standard Regarding Nutritional Fortification Substances in Foods

4.3.6 For a substance made of food, which has some packaging functions and could be ate along with the food it wrapped, the original ingredients (of the substances) of the substance shall also be declared in the list of ingredients, unless existing national standard, industry standard or laws and regulations have different provisions.

4.3.7 With regard to strains that are added to plays a non-fermentative role, not inactivated or removed in the production process, the specific names of the added strains shall be declared; the corresponding strain number ID and content could be declared at the same time. With regard to strains that are added to play a fermentative role, not inactivated or removed in the production process, such strains shall be declared in accordance with methods provided in Table A.3. With regard to strains that are added to play a fermentative role and have undergone inactivation or are removed by filtration in the manufacturing process, such strains need not be declared.

4.3.8 The ingredients listed in Appendix A.6 can either be declared in their attribute names, or be declared by their class names, unless existing national standard or industry standard have different provisions.

#### **4.4 Ingredient emphasis and quantitative ingredient declaration**

4.4.1 Where the label or specification of a food emphasizes the adding or containing of one or more ingredients or components, such ingredient(s) or compound(s) shall be clearly declared in the list of ingredients, or use descriptions to declare the ingoing volume or content of the ingredient/compound in the finished product (please refer to Appendix D for the declaration formats).

4.4.1.1 An ingredient or a component mentioned in the label or the specification of a food, which does not constitute special emphasis if one of the following conditions are met, thus it is exempted to declare the ingredient or the component's ingoing volume or content. Where mandatory standard or recommended national standard, industry standard, local standard and other laws and regulations implemented for the product has different provisions, those provisions shall prevail.

- a. The ingredient or component mentioned in the warning of allergens or other warnings/reminding words;
- b. The ingredient or component mentioned only in the instructions for use or product mix recommendations;
- c. (The ingredient or component is mentioned) only to describe sensory characteristics of the product, such as appearance, flavor, taste, and production techniques.

4.4.1.2 An ingredient or component mentioned in the food name shall be declared with its ingoing volume or content in the finished product. It is exempted to declare the ingredient or the component's ingoing volume or content if one of the following conditions are met; where national standard, industry standard, local standard and other laws and regulations have different provisions, those provisions shall prevail.

- a. The ingredients or components in the name of food, or in an equivalent name which has the same meaning or same nature, which (the names) are stipulated in national standard, industry standard, or local standard;



- b. The ingredients or components for which a national standard, an industry standard, or a local standard has already provided for the ingoing volume, or content of the ingredient/component in the finished product;
- c. The ingredients or components used only to describe sensory characteristics of the product, such as its appearance, flavor, taste, and production techniques, and the words “taste” or “flavor” are used to descript the ingredient or the component.

4.4.1.3 Where a graphic or a picture printed on the product packaging to illustrate taste, flavor, etc., which involves a certain food or food ingredient, such graphics or pictures do not constitute special emphasis. For flavors only prepared with flavoring essence, the use of photos of related raw materials or food is not allowed.

4.4.2 Where the label of a food places special emphasis on the low or zero content of one or more ingredients or components, the content of the emphasized ingredient or component in the finished product shall be declared.

4.4.2.1 Where words such as “-free” and “does not contain” are used, the content of the corresponding ingredients or components shall be declared as “0”; where other laws, regulations or food safety standards provide otherwise, those provisions shall prevail. Food additives, contaminants and substances prohibited to be added by laws, regulations and standards, or substances that should not exist in food, shall not be declared with words such as “-free, “does not contain” and their synonyms (for synonyms to content claims, refer to Appendix D).

4.4.2.2 It is not allowed to use words such as “not adding”, “not used” and their synonyms; where other laws, regulations or national food safety standards have different provisions, those provisions shall prevail.

#### **4.5 Net content and configuration**

4.5.1 Declaration of net content is composed of the net content, numbers and the official measurement units; for prepackaged foods sold by weight, “measurement by weight” shall be declared instead of net content. (Refer to Appendix A for declaration requirements and formats of net content).

4.5.2 The net content of food in a package (container) shall be declared using an official measurement unit; net content shall be declared in the following formats:

- a. For liquid foods, by volume or weight;
- b. For solid foods, by weight;
- c. For semi-solid or viscous foods, either by volume or weight;
- d. For various sausage casings from animals or plants, by length.

4.5.3 The net content shall be declared on the same displaying side where the food name locates on the package or container.

4.5.4 When a container contains foods in both solid and liquid forms, and the solid substances are the major ingredient, weigh or the percentage of weight shall also be used to declare the drained (solid) contents in addition to the declared net content.

4.5.5 Where a prepackaged food contains several prepackaged foods, the package shall also declare configuration in addition to the declared net content.

4.5.6 Declaration of configuration is composed of net content and the number of packages in it; or declare only the number of packages and omit the word “configuration”. Where the configuration of an individual prepackaged food equals to the net content, the word “configuration” could be omitted.

#### **4.6 Name, address and contact information of the manufacturer and the distributor**

4.6.1 Name, address and contact information of the manufacturer shall be declared. The name and address of the manufacturer shall be the name and address of the manufacturer that is legally registered, who is to be held responsible for product safety and quality.

4.6.1.1 For a group company and its subsidiary that could both bear independent statutory responsibilities, names and addresses of both shall be declared, respectively.

4.6.1.2 For branch company of a group company or a production base of a group company that cannot bear independent statutory responsibilities, name and address of the group company shall be declared at the same time.

4.6.1.3 If the prepackaged food is produced by a contracted entity, name and address of the contracting entity and the contracted entity shall both be declared at the same time.

4.6.2 For producer or distributor that could independently bear statutory responsibilities, one of the following information shall be declared: telephone number, fax number, e-mail, website address, etc.

#### **4.7 Date marking**

4.7.1 The date of manufacture and the shelf life shall be marked in the sequence of year, month, date. Where the date is marked as “see xxx (location) of the package”, the specific location on the package shall be clearly indicated (please refer to Appendix A for the marking formats). The date marking shall not be separated from the package; it shall not be pasted (on the package), re-printed, or altered.

4.7.2 When one prepackaged food contains multiple individual prepackaged foods that all mark dates of manufacture and shelf life, the shelf life declared on the outer package shall be the shelf life of the individually prepackaged food that first arrives. The date of manufacture marked on the outer package shall be the earliest date of manufacture of the individual prepackaged foods in it, or the date the outer package is made into a selling unit. It is also allowed to mark all individual packages’ dates of manufacture and the shelf life respectively on the outer package.

#### **4.8 Storage conditions**

Label of prepackaged foods shall declare the storage conditions (please refer to Appendix A for declaration formats).

#### **4.9 Food production licensing number**

4.9.1 For those prepackaged foods that are required to declare food production licensing number, declaration format shall follow relevant provisions (by regulations).

4.9.2 If the prepackaged food is produced by a contracted entity, the food production licensing number of the contracted entity shall be declared; the contracting entity's food production licensing number may be declared at the same time.

#### **4.10 Number of the implemented product standard**

Prepackaged foods produced and distributed in China shall declare the number of the implemented product standard and the standard sequence number.

#### **4.11 Quality grade of product**

If the implemented product standard has clear provisions for the product quality grade, the quality grade shall be declared.

#### **4.12 Declaration of allergens**

4.12.1 Some food ingredients may cause allergy to some people; if such ingredients are used, warnings shall be declared in the list of ingredients, or declare the warning content in close proximity to the list of ingredients (please refer to Appendix E for the list of allergens and the declaration format).

4.12.2 If allergens may be carried over during production or processing, for example, through shared manufacturing workshop or production line, the warning message of allergens shall be declared (please refer to Appendix E for the declaration format).

4.12.3 The ingredients listed in Appendix E.5 are exempted from declaring allergens.

#### **4.13 Nutrition label**

4.13.1 Foods for special dietary purposes shall declare their major nutrient components and their contents; declaration shall follow provisions in the GB 13432<sup>3</sup>.

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<sup>3</sup> Editor's note: National Food Safety Standard for the Labelling of Pre-packaged Foods for Special Dietary Uses

4.13.2 In addition to the above foods, nutrition labels shall follow provisions in GB 28050<sup>4</sup>.

#### **4.14 Other declaration information**

##### 4.14.1 Irradiated foods

4.14.1.1 For foods that are treated with ionizing radiation, the statement “irradiated treatment” shall be declared in close proximity to the name of the food.

4.14.1.2 Any food ingredient which has been treated with ionizing radiation shall be declared in the list of ingredients or in close proximity to the list of ingredients.

##### 4.14.2 Genetically modified foods

Labelling of genetically modified foods shall comply with provisions in relevant laws and regulations. Foods that are not made of ingredients obtained through biotechnology shall not be declared as “non-genetically modified foods”.

##### 4.14.3 Special foods

With regard to foods that are subject to special approvals in China, the items in their labels that require approval shall follow relevant provisions.

### **5 Label information of prepackaged foods that are not directly offered to consumers**

With regard to prepackaged foods that are not directly offered to consumers, their labels shall declare the name, configuration, net content, date of manufacture, shelf life and storage conditions of the product, as required by relevant paragraphs in Article 4 of this Standard. Other information that are not declared on the label shall be provided in the product specifications or contracts.

### **6 Contents that are Exempted from Declaration**

6.1 The following prepackaged foods are exempted from declaring shelf life

Liquors with alcohol content of 10% or higher; vinegar; food grade salt; solid sugars; and monosodium glutamate.

6.2 When the largest surface area of a package or a container is less than 20 cm<sup>2</sup>, only the food name, net content, date of manufacture, shelf life, and the name and address of the manufacturer or distributor are required to be declared.

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<sup>4</sup> Editor’s note: National Food Safety Standard for Nutrition Labelling of Prepackaged Foods

6.3 When the largest surface area of the package or the container of a prepackaged food sold by weight is less than 10 cm<sup>2</sup>, the word “measurement by weight” is exempted to be declared.

## **7 Imported foods**

### **7.1 General requirements**

7.1.1 All declared content in the label of imported prepackaged foods (including the specifications obtainable on the labels) shall comply with provisions of Chinese laws, regulations and food safety standards.

7.1.2 The label of imported prepackaged food shall be accompanied with a printed or a pasted label in Chinese. The Chinese label of imported prepackaged food shall contain the mandatory declaration items required by this standard, relevant laws, regulations and food safety standards. The content expressed in foreign language or traditional Chinese characters on the label shall be correspondent with the standard Chinese characters (except for trademark, name and address of manufacturer, name and address of foreign distributor, and website); the content expressed in the foreign language or in the traditional Chinese characters shall comply with requirements provided in Article 3.2 to 3.5 of this standard.

7.1.3 Declared content in labels of imported prepackaged foods shall comply with requirements of corresponding clauses in Article 4 (with the exception of 4.9 – 4.11) of GB 7718<sup>5</sup>.

### **7.2 List of ingredients**

The content of the list of ingredients of imported prepackaged food in foreign language shall have corresponding content in the list of ingredients in Chinese; the ingredients that are not declared in the original list of ingredients but are required to be declared by Chinese laws, regulations and standards shall also be declared in the Chinese list of ingredients (including water and individual raw materials that were added in food production and processing).

### **7.3 Name, address and contact information of manufacturers and distributors**

Imported prepackaged foods must declare the name, address and contact information of its agent, importer or distributor that have registered (with competent authorities) in China; name, address and contact information of the manufacturer need not be declared.

### **7.4 Country (region) of origin**

7.4.1 If a product is completely obtained in one country/region, the country/region is the country (region) of origin of the product. When a food undergoes processing in two or more countries (regions), the country (region) where the nature of the food changes shall be considered as the country (region) of origin.

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<sup>5</sup> Editor’s note: National Food Safety Standard - General Standard for the Labelling of Prepackaged Foods

7.4.2 For imported prepackaged food, the country or region (such as Hong Kong, Macao or Taiwan) of origin shall be declared; the source or the producing country/region of its raw materials or ingredients may be declared at the same time.

### **7.5 Date marking**

For imported prepackaged food without date of manufacture, the date of manufacture shall be calculated and marked based on the shelf life and the best before date marked on the original package.

### **7.6 Intended consumer group, serving size or instructions for use**

Where the original label of an imported prepackaged food involves the intended consumer group, serving size or instruction for use, such information should have corresponding Chinese (in the Chinese label). Information related to the intended consumer group and serving size shall comply with requirements by relevant national food safety standards

### **7.7 Quality grade**

Imported prepackaged foods could declare quality grade. The declared quality grade shall be truthful, accurate and consistent with the quality grading provided by relevant product standards in China.

### **7.8 Others**

Imported prepackaged foods need not declare food production licensing number, and the number of the implemented product standard.

## **8 Recommended declaration content**

Label of prepackaged foods could declare recommended declaration content, such as the product batch number, instruction for use and the intended consumer. Please refer to the Appendix F for specific declaration requirements for the above recommended declaration content.

## Appendix A

### Requirements for the Use of Characters in Label of Prepackaged Foods and the Recommended Formats of Some Labelling Items

#### A.1 General Provisions

This appendix specifies the requirements for the use of characters in labels of prepackaged foods; it uses examples to provide recommended declaration formats of some label items of prepackaged foods. To declare relevant items, these formats are optional but not exclusive; if necessary, such recommended formats could be adjusted based on features of the food or the package, and the adjusted declarations shall be consistent with the principle/basic meaning of the recommended formats.

#### A.2 Requirements for characters in prepackaged food labels

*Pinyin* (in label) shall not be larger than the corresponding standard Chinese characters (except for *pinyin* in trademarks) in height. All foreign characters and traditional Chinese characters shall not be larger than the corresponding standard Chinese characters (except those in trademarks) in height. Art characters of different kinds used for decorating purpose must be written correctly and readily legible.

Where the largest surface area of a package (container) is larger than 60 cm<sup>2</sup>, the minimum height of the characters, symbols and numbers in the mandatory declaration items shall not be less than 1.8 mm in height.

#### A.3 Declaration of net content and configuration

A.3.1 The measurement units for net content shall be declared following Table A.1.

**Table A.1 Measurement Units for Net Content Declaration**

Measurement method	Range of net content (Q)	Unit of measurement
Volume	Q < 1000mL	mL (ml)
	Q ≥ 1000mL	L (l)
Weight	Q < 1000g	g
	Q ≥ 1000g	kg
Length	Q < 100cm	cm
	Q ≥ 100cm	m

A.3.2 The minimum height of characters for net content declaration shall comply with requirements in Table A.2.

**Table A.2 The minimum height of characters for net content declaration**

Range of net content (Q)	Minimum height of font/mm
$Q \leq 50 \text{ mL}; Q \leq 50\text{g}; Q \leq 100\text{cm}$	2
$50 \text{ mL} < Q \leq 200 \text{ mL}; 50 \text{ g} < Q \leq 200\text{g};$	3
$200 \text{ mL} < Q \leq 1\text{L}; 200\text{g} < Q \leq 1\text{kg}$	4
$Q > 1 \text{ kg}; Q > 1 \text{ L}; Q > 1\text{m}$	6

A.3.3 The net content (configuration) of individual prepackaged food may be declared as follows:

Net content (or net content/configuration): 450g;

Net content (or net content/configuration): 225g (200g + 25g for free);

Net content (or net content/configuration): 200g + gift of 25g;

Net content (or net content/configuration): (200+25)g.

Net content (or net content/configuration): Net content 250g, gift of 25g.

Measurement by weight

A.3.4 The net content and drained (solid) contents may be declared as follows:

Net content (or net content/configuration): 425g, drained contents (solid contents or “food ingredients in solid form”) no less than 255g (or no less than 60%).

A.3.5 For prepackaged food containing several prepackaged foods of the same kind, the net content and configuration may be declared as follows:

Net content (or net content/configuration): 40g x 5;

Net content (or net content/configuration): 5 x 40g;

Net content (or net content/configuration): 200g (5 x 40g);

Net content (or net content/configuration): 200g (40g x 5);

Net content (or net content/configuration): 200g (5 units);

Net content: configuration of 200g: 5 x 40g;

Net content: configuration of 200g: 40g x 5;

Net content: configuration of 200g: 5 units;

Net content (or net content/configuration): 200g (100g + 50g x 2);

Net content (or net content/configuration): 200g (80g x 2 + 40g);

Net content: configuration of 200g: 100g + 50g x 2;

Net content: configuration of 200g: 80g x 2 + 40g.

A.3.6 For a prepackaged food containing multiple prepackaged foods of different kinds, the net content and configuration may be declared as follows:

Net content (or net content/configuration): 200g (Product A 40g x 3, Product B 40g x 2);



Net content (or net content/configuration): 200g (40g x 3, 40g x 2);  
Net content (or net content/configuration): 100g Product A, 50g x 2 Product B, 50g Product C;  
Net content (or net content/configuration): Product A: 100g, Product B: 50g x 2, Product C: 50g;  
Net content (or net content/configuration): 100g (Product A), 50g x 2 (Product B), 50g (Product C);  
Net content/configuration: Product A 100g, Product B 50g x 2, Product C 50g.

For ease of expression, the above samples for net content declaration all use weight as the measurement unit, and uses colon as the separator. In actual labels, suitable measurement units should be used; space or other legible symbols could be used as separators based on the actual situation.

#### **A.4 Marking of Date**

The year, month, and date can be separated by space, slash, hyphen, period, or marked without separators. Generally, the year shall be a four-digit number, or a two-digit number when the largest surface area of the package is less than 35cm<sup>2</sup>. The month and date shall be marked using two-digit numbers, respectively.

The date may be marked as follows:

Date: 2010 year (in Chinese) 03 month (in Chinese) 20 day (in Chinese); 2010 year (in Chinese) 03 month (in Chinese) 20 day (in Chinese) 23:00;

2010 03 20; 2010/03/20; 20100320;

The shelf life may be marked as follows:

Best to eat (drink) before...; eat (drink) best before...; best before...;

Best before the date ...; eat (drink) best before the date ...;

Mark the shelf life in formats as: Shelf life ends on ; shelf life of xx months (or xx days, or xx weeks, or x years).

#### **A.5 Declaration of storage conditions**

Conditions for storage can be declared as "Storage Condition", "Condition for Storage", "Storage Method", or do not mention the title.

Storage conditions may be declared as follows:

Stored at room temperature (or frozen, or refrigerated, or avoid light, or in a cool and dry place); stored at xx-xx °C;

Please store it in a cool and dry place;

Stored at room temperature; refrigerate the food after the package is open;

Temperature: ≤xx°C; moisture: ≤xx %.

#### **A.6 Method for Declaring Class Names of Ingredients**

The ingredients listed in Table A.3 can use the following methods to declare their class names.

**Table A.3 Methods for Declaring Class Names of Some Ingredients**

Ingredient Classes	Methods for Declaring Class Names
Vegetable oil of different kinds added to non-vegetable oil products, which account for less than 25% of the weight of the food	“Vegetable oil” or “refined vegetable oil”, declare “hydrogenated” or “partially hydrogenated” if it has been hydrogenated.
Starches of different kinds; not including chemically modified starches	“Starch”
Spices and spice extracts not exceeding 2% (either individually or in total)	“Spice”, “spices” or “compound spices”
Gum preparations of different kinds in gum-based candies	“Gum base agent”, “gum base”
Preserved fruits and candied fruits of different kinds not exceeding 10% of the weight of the food	“Candied and preserved fruits”
Strains added, not inactivated or removed in the production process (except those strains that play a non-fermentative role in finished products)	“Fermentative strain”, “microbial starter culture”
Non-single fruit juice (pulp, powder), vegetable juice (pulp, powder), fruit and vegetable juice (pulp, powder) not exceeding 2% of the weight of the food	“Fruit juice (pulp, powder)”, “vegetable juice (pulp, powder)”, “fruit and vegetable juice (pulp, powder)”, “concentrated vegetable juice (pulp, powder)”, “concentrated fruit and vegetable juice (pulp, powder)”
Food flavoring essence, food flavoring substances	“Food flavoring essence”, “food flavoring substance”, “food flavoring essence and substance”, “food-use flavoring essence”, “food essence”

## Appendix B

### Declaration Formats of Food Additives in the List of Ingredients

#### **B.1 Declare all common names of food additives in descending order of the ingoing volumes.**

Ingredients: water, whole milk powder, cream, vegetable oil, chocolate (cocoa liquor, sugar, cocoa butter, phospholipid, PGPR, food flavoring essence, lemon yellow), glucose syrup, propylene glycol ester of fatty acid, carrageenan, guar gum, annatto, maltodextrin and food flavoring substance.

#### **B.2 Declare all function class names and common names of food additives in descending order of the ingoing volume.**

Ingredients: water, whole milk powder, cream, vegetable oil, chocolate [cocoa liquor, sugar, cocoa butter, emulsifier (phospholipid and PGPR), food flavoring essence, colorant (lemon yellow)], glucose syrup, emulsifier (propylene glycol ester of fatty acid), thickener (carrageenan and guar gum), colorant (annatto), maltodextrin and food flavoring substance.

#### **B.3 When the largest surface area of the package or container is less than 60cm<sup>2</sup>, declare all function class names and international numbering identifications of food additives in descending order in terms of ingoing volume.**

Ingredients: water, whole milk powder, cream, vegetable oil, chocolate (cocoa liquor, sugar, cocoa butter), emulsifier (322, 476), food flavoring essence, colorant (102), glucose syrup, emulsifier (477), thickener (407, 412), colorant (160b), maltodextrin and food flavoring substances.

#### **B.4 Establish the format for declaration of food additives**

##### B.4.1 General principles

Food additives that are directly added shall be declared in the food additive item; do not declare food additives that are used indirectly under the food additive item; nutritional fortification substances, food flavoring essences and substances, gum base agents in gum-based candies can be declared outside the food additive item in the list of ingredients.

The position of the food additive item in the list of ingredients is determined by the total (ingoing) volume of food additives included in this item.

##### B.4.2 Declare all common names of food additives

Ingredients: water, whole milk powder, cream, vegetable oil, chocolate (cocoa liquor, sugar, cocoa butter, phospholipid, PGPR, food flavor and lemon yellow), glucose syrup, food additives (propylene glycol ester of fatty acid, carrageenan, guar gum and annatto), maltodextrin and food flavoring substance.

B.4.3 When the largest surface area of the package or container is less than 60cm<sup>2</sup>, declare all function class names and international numbering identifications of food additives

Ingredients: water, whole milk powder, cream, vegetable oil, chocolate (cocoa liquor, sugar, cocoa butter, emulsifier (322, 476), food flavoring essence, colorant (102), glucose syrup, food additives (emulsifier (477), thickener (407, 412) and colorant (160b)), maltodextrin and food flavoring substance.

B.4.4 Declare all function class names and common names of food additives

Ingredients: water, whole milk powder, cream, vegetable oil, chocolate [cocoa liquor, sugar, cocoa butter, emulsifier (phospholipid and PGPR), food flavoring essence, colorant (lemon yellow)], glucose syrup, food additives (emulsifier (propylene glycol ester of fatty acid), thickener (carrageenan and guar gum), colorant (annatto), maltodextrin and food flavoring substance.

## Appendix C

### Method for Calculating the Largest Surface Area of A Package (Container)

#### C.1 Method for calculating (surface area of) a rectangular package or container

For a rectangular package or container, the height (cm) times the width (cm) of the largest side of the package.

#### C.2 Method for calculating (surface area of) a cylindrical or a nearly cylindrical package or container

In the case of a cylindrical or nearly cylindrical package or container, 40% times the height (cm) times the circumference (cm) of the cylinder.

#### C.3 Method for calculating (surface area of) packages or containers of other shapes

Surface of the flat or almost flat side is regarded as the largest surface. When there are multiple flat sides or almost flat sides, the one with the largest area shall be used for calculation. If there is no obvious flat side or approximately flat side, the maximum area is 40% of the total surface area of the tiled package or container.

**C.4 When calculating the surface area, the area of seal and the part that cannot print characters shall be excluded. While calculating surface area of bottle or can-shaped packages, the shoulders, necks, the edge at the top and the bottom shall be excluded.**

## Appendix D

### The methods for Quantitative Declaration of Ingredients

#### D.1 General Provisions

D.1.1 This appendix provides the recommended declaration principles and formats for quantitative declaration of ingredients of prepackaged foods. These formats are optional but not exclusive; declaration of relevant items shall be consistent with the meaning of the recommended formats.

D.1.2 According to the actual production and processing, declare the ingoing volume of the emphasized ingredients in the original ingredients, or declare the content of ingredients after processing.

D.1.3 If the ingredients requiring quantitative declaration fall within the scope of nutrition labelling, the provisions of relevant standards shall be followed; otherwise, the ingredients requiring quantitative declaration shall be declared out of the nutrition label item.

#### D.2 Declare the ingoing volume or content in numerical formats

Containing fruit-ingredient 20g/package

The content of mixed nuts (peanut, almond and pistachio) is higher than 6g/serving

The content of Colombian coffee is no less than 5g/100mL

Jujube powder (10g)

The content of tea polyphenol  $\geq 200\text{mg/L}$

#### D.3 Declare the ingoing volume or content in percentage format

The content of berries is more than 5%

The ingoing volumes of strawberries and blueberries are both higher than 2.5%

The ingoing volume of strawberry jam is no less than 3%

Imported milk powder ( $\geq 3.2\%$ )

Total juice (based on original juice)  $\geq 2.5\%$

#### D.4 Declare content with a range of variation

Rapeseed oil  $20\% \pm 2\%$  ( $20 \pm 2\%$ )

Peanut  $20\text{g} \pm 5\text{g}$

Banana powder 10-12g; or (banana 100-120g)

Peanut oil (10-15%), sunflower seed oil (8-12%)

#### D.5 Declare content with additional explanations

Contains fruit grains 15g/100ml, which may vary due to the production techniques

The content of peanuts is no less than 20g, but there may be differences among individual packages

#### **D.6 Synonyms of content claims**

Synonyms equivalent to “does not contain” and “-free”: “zero (0)”, “no”, “0%”, etc.

Synonyms equivalent to “does not add”, “does not use”: “without adding”, “zero-added”, “not using”, “not adding”, “no added”, “not used”, etc.

## Appendix E

### The Methods for Declaring Allergens in Food Labels

#### E.1 General Provisions

This appendix specifies the ingredient categories that require mandatory declaration of allergens; it uses examples to provide recommended formats for declaring ingredients in prepackaged foods that contain allergens, or the allergens that may be indirectly introduced during production process. To declare relevant items, these formats are optional but are not exclusive. If necessary, such recommended formats could be adjusted based on features of the food or the package, and the adjusted declarations shall be consistent with the basic meaning of the recommended formats.

#### E.2 List of ingredient categories that requires warning of allergen:

- a. Grains and grain products containing gluten substances (for example wheat, rye, barley, oat, spelt or their crossbreeding products);
- b. Crustacean animals and products (for example shrimp, lobster, crab and so on);
- c. Fish and its products;
- d. Egg and its products;
- e. Peanut and its products;
- f. Soybean and its products;
- g. Milk and dairy products (including lactose);
- h. Nut and its products.

Other possible allergens not listed above could be declared voluntarily.

#### E.3 When allergens are used as ingredients, they shall be declared in one of the following formats:

E.3.1 In the list of ingredients, use legible names and declaration methods (including but not limited to bold font, underline and other highlighting methods):

Ingredients: water, whole milk powder, cream, vegetable oil, chocolate (cocoa liquor, sugar, cocoa butter, phospholipid, PGPR, food flavor and lemon yellow), peanut, glucose syrup, propylene glycol ester of fatty acid, carrageenan, guar gum, annatto, maltodextrin and food flavoring substance.



Ingredients: **wheat flour**, sugar, **hazelnut jam (hazelnut and chocolate)**

E.3.2 Provide warning in close proximity to the list of ingredients; marking words such as “warning of food allergens”, “warning of allergens” or “information of allergens” may be used at the same time:

Containing egg, peanut, nut, and milk

Containing peanut butter

This product contains fish and soybean components

This product contains fish and soybean components, and may cause food allergy

E.4 Allergens that are or may be introduced indirectly during processing shall be alerted in close proximity to the list of ingredients or at other locations (on package) using the following methods:

“This product may contain...”

“May contain...”

“May contain trace amount of...”

“The production equipment also processes food containing...”

“The production line also processes food containing...”

E.5 Heavily processed ingredients that are exempted from declaring allergens:

- a. Refined vegetable oil;
- b. Phospholipid;
- c. Starch and dextrin.

## **Appendix F**

### **Recommended Declaration Content**

#### **F.1 Batch number**

The batch number of the product may be declared if necessary.

#### **F.2 Instruction for use and the intended consumer group**

F.2.1 Instructions that are helpful to consumers, such as the method of opening the container, consumption or using method, cooking method, rehydration and reproduction method and shelf life after opening container, may be declared.

F.2.2 For declarations in product label and specifications that are relevant to specific consumer groups, there should better be evidence proving the food satisfies special nutrition needs of different consumer populations.

**END TRANSLATION**

#### **Attachments:**

No Attachments.