

## APPENDIX C

## Recommended Labeling Forms for Some Labeling Items

**C.1 Introduction**

This appendix provides the recommended labeling forms for some of the labeling items in pre-packaged food by giving typical examples. While labeling the corresponding items, it shall select, but not limited to, these forms. If it is necessary to modify the use of the recommended forms according to the food characteristics or the features of the packaging, etc., it shall maintain consistency with the fundamental meaning of the recommended forms.

**C.2 Labeling of Net Weight and Specifications**

For the convenience of expression, the labeling of the net weight shall be standardized to use mass as the measurement method. The colon is used as a separator. The label shall use the appropriate measurement unit for the actual product. It shall select a space or other symbol as a separator according to the actual situation for the convenience of reading the label.

**C.2.1** The net weight (specification) for the single pre-packaged food shall contain the following labeling forms:

Net Weight (or Net Weight/Specification): 450g;  
 Net Weight (or Net Weight/Specification): 225g (200g + 25g free);  
 Net Weight (or Net Weight/Specification): 200g + 25g free;  
 Net Weight (or Net Weight/Specification): (200 + 25)g.

**C.2.2** The net weight and drained substance (solid substance) shall contain the following labeling forms (take a can of "Pear in Syrup" as an example):

Net Weight (or Net Weight/Specification): 425g Drained substances (or solid substances or slices of pear): Not less than 255g (or not less than 60%).

**C.2.3** When there are many pre-packaged food belonging to the same type within the same pre-packaging, the net weight and specifications shall contain the following labeling forms:

Net Weight (or Net Weight/Specification): 40g X 5;  
 Net Weight (or Net Weight/Specification): 5 X 40g;  
 Net Weight (or Net Weight/Specification): 200g (5 X 40g);  
 Net Weight (or Net Weight/Specification): 200g (40g X 5);  
 Net Weight (or Net Weight/Specification): 200g (5 items);  
 Net Weight: 200g Specification: 5 X 40g;  
 Net Weight: 200g Specification: 40g X 5;  
 Net Weight: 200g Specification: 5 items;  
 Net Weight (or Net Weight/Specification): 200g (100g + 50g X 2);  
 Net Weight (or Net Weight/Specification): 200g (80g X 2 + 40g);  
 Net Weight: 200g Specification: 100g + 50g X 2;  
 Net Weight: 200g Specification: 80g X 2 + 40g.

**C.2.4** When there are many pre-packaged food belonging to the different types within the same pre-packaging, the net weight and specifications shall contain the following labeling forms:

Net Weight (or Net Weight/Specification): 200g (Product A – 40g X 3, Product B – 40g X 2);  
 Net Weight (or Net Weight/Specification): 200g (40g X 3, 40g X 2);  
 Net Weight (or Net Weight/Specification): 100g: Product A, 50g X 2: Product B, 50g: Product C;  
 Net Weight (or Net Weight/Specification): Product A: 100g, Product B: 50g X 2, Product C: 50g;  
 Net Weight/Specification: 100g (Product A), 50g X 2 (Product B), 50g (Product C);  
 Net Weight/Specification: Product A 100g, Product B 50g X 2, Product C 50g.

**C.3 Date Label**

The year, month and day in a date shall use a space, slash, hyphen, full stop, etc. as a separator, or shall not use any separator. The year shall generally be labeled with 4 numbers. For small packaged food, it shall also be labeled with 2 numbers. The month and day shall be labeled with 2 numbers.

The date label shall contain the following forms:

Mar 20, 2010;

2010 03 20; 2010/03/20; 20100320;  
20 Mar 2010; Mar 20, 2010;  
(mm/dd/yyyy): 03 20 2010; 03/20/2010; 03202010;

#### **C. 4 Label for Expiry Date**

The expiry date shall contain the following labeling formats:

Best consumed before .....; before ..... consumed the best; before ..... the best;

Before this date ..... the best; before this date ..... consumed the best;

Expiry date (to) .....; expiry date xx months (or xx days, or xx weeks, or x years)

#### **C. 5 Label for Storage Conditions**

The storage conditions shall be labeled as “storage conditions”, “storage conditions”, “storage methods” and other titles, or not be labeled with any title.

The storage conditions shall contain the following labeling forms:

Stored in room temperature (or frozen, or chilled, or avoid sunlight, or a cool and dry place):

Stored at xx – xx°C;

Please store in a cool and dry place;

Stored at room temperature, refrigerate after opening;

Temperature: ≤ xx°C; Temperature: ≤ xx%.

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# The Evaluation Statement of the National Health and Family Planning Commission on Food Safety Standards and Monitoring

## “General Rules of Pre-packaged Food Labels” (GB 7718-2011) Questions and Answers (Revised version)

National Health and Family Planning Commission of the People’s Republic of China Feb 26, 2014

### 1. Objective and Basis of Revising the “General Rules of Pre-packaged Food Labels”

Food labels are the carriers for transmitting product information to the consumers. By performing well in the pre-packaged food label management, it not only protects the rights and interests of the consumers and delivers an effective method to safeguard the healthy development of the industry, it also meets the requirements of food safety scientific management. According to the “Food Safety Law” and the provisions of its enforcing regulations, the original Ministry of Health has made revisions to the pre-packaged food label standards. The new “General Rules of Pre-packaged Food Labels”, (GB 7718-2011), has fully considered the implementation situation of the “General Rules of Pre-packaged Food Labels”, (GB 7718-2004). It refines and streamlines the “Food Safety Law” and the comprehensive requirements of its regulation implemented on food labels, enhancing the scientific nature and operability of the standards.

### 2. Relationship of “General Rules of Pre-packaged Food Labels”, (GB 7718-2011), with the Rules and Regulations, Normative Documents of the Relevant Departments

The “General Rules of Pre-packaged Food Labels”, (GB 7718-2011), belongs to the national food safety standards. If the corresponding contents stipulated in the relevant rules and regulations, normative documents are not consistent with this standard, it shall be executed according to this standard.

This standard defines the universality requirements of the pre-packaged food labels. If the other national food safety standards have special provisions, it shall execute both the universality requirements and special provisions of the pre-packaged food labels at the same time.

### 3. Main Process of the Standards Revision

According to the “Food Safety Law” and its enforcing regulations and the food safety monitoring work requirements, the original Ministry of Health has appointed the Chinese Center for Disease Control and Prevention, China National Food Industry Association, and other units to form a standards drafting group to be responsible for the mission of revising the standards. On many occasions, the standards drafting group has organized expert research, convened seminars and expert consultancy conferences. It comprehensively listened to the opinions of the relevant departments, industry associations and enterprises. This standard was open to the public for suggestions and opinions through the website of the National Health and Family Planning Commission, that has undergone reform from the original Ministry of Health and organization. It received a total of over **700** feedback opinions and suggestions for revision. The standards drafting group analyzed the feedback opinions one by one and immediately convened a thematic conference to conduct research, further improving the texts of the standards. This standard was passed at the fifth directors’ meeting of the National Food Safety Standards Review Committee after review. It was publicly announced on **April 20, 2011** and officially implemented on **April 20, 2012**.

### 4. Main Contents of the Improved, Revised Standards

- (1) The applicable scope of the revised standards. This standard is applicable to two types of pre-packaged food: One is the pre-packaged food that are directly delivered to the consumers; second is the pre-packaged food that are indirectly delivered to the consumers. It is not applicable to the labels of unpackaged food, food that are produced and sold on site and food packaging for storage and transportation.
- (2) According to the requirements of the “Food Safety Law”, this standard has made a revision on the definitions of “pre-packaged food” and “manufacturing date”, enhancing the definition of “specifications” and the labeling methods of “specifications”.
- (3) According to the requirements of the “Food Safety Law”, this standard increases the contents of the “the contents that shall not be labeled or hinted with the effects of prevention and treatment of diseases, non-health supplement food shall not explicitly or implicitly express the health effects”.
- (4) According to the provisions of the “Food Safety Law”, this standard streamlines the labeling requirements for food additives, clearly defining that the food additives shall be labeled as the generic names specified in the “Usage Standards of Food Additives”, (GB 2760).

(5) With reference to the Codex Alimentarius, this standard increases the recommended labeling requirements for food allergens such that the consumers can scientifically choose the food according to their own situations.

**5. Relating to the definition of pre-packaged food**

According to the “Food Safety Law” and “Measures for the Metrological Supervision and Administration of Quantitatively Packed Commodities”, and with reference to the prior food label management experiences, this standard defines the “pre-packaged food as: Food that are pre-packaged in fixed quantities or prepared in packaging materials and containers, including the pre-order packaged and pre-order food produced in the packaging materials and containers with a uniform mass or volume label within a certain quantity range. The pre-packaged food shall be pre-packaged in the first place. In addition, the packaging must contain a uniform mass or volume label.

**6. Relating to the differences between the labeling of the “pre-packaged food directly delivered to the consumers” and the “pre-packaged food indirectly delivered to the consumers”**

For the pre-packaged food directly delivered to the consumers, all items shall be shown in the labels. The labels for the pre-packaged food indirectly delivered to the consumers must contain the food name, specifications, net weight, manufacturing date, expiry date and storage conditions. If the other contents are yet to be shown in the labels, it shall be remarked in the user manual or contract.

**7. Relating to the situation of the “pre-packaged food directly delivered to the consumers”**

One is the pre-packaged food directly or through the food operators (including catering services) to be delivered to the consumers by the manufacturers; two is the pre-packaged food that are both delivered to the consumers and other food producers. The importers dealing with such types of imported pre-packaged food shall also carry out according to the aforementioned provisions.

**8. Relating to the situation of the “pre-packaged food indirectly delivered to the consumers”**

One is the pre-packaged food delivered to the other food producers by the manufacturers; two is the pre-packaged food that are delivered to the catering industry as raw materials and supplementary materials by the manufacturers. The importers dealing with such types of imported pre-packaged food shall also carry out according to the aforementioned provisions.

**9. Relating to the labeling situation that does not belong to the management of this standard**

One is the unpackaged food labels; two is the food packaging labels for the purpose of providing protection and convenient handling in the process of storage and transportation; three is the food labels related to those produced and sold on site. The aforementioned situations shall also carry out with reference to this standard.

**10. The definition of the manufacturing date in this standard**

The “manufacturing date” defined in this standard refers to the date on which the pre-packaged food have become the final sales unit. The terms such as “packaging date”, “bottling date”, etc. used in the original “General Rules of Pre-packaged Food Labels”, (GB 7718-2004), shall be standardized as the “manufacturing date” in this standard.

**11. If the product is not added with certain types of food ingredients, but is only added with the related flavorful spices and flavors, should it be allowed to show the physical diagram of the food on the label?**

The contents within the labels shown shall be authentic and accurate. It shall not use words, diagrams, etc. that may easily lead the consumers to misunderstand or may be fraudulent, and other methods to introduce the food. When the diagrams or words used may lead the consumers to misunderstand, it shall use concise and eye-catching words in its explanation.

**12. Relating to the use of traditional Chinese words in the label**

This standard defines the standard Chinese words used in the food label, but not including the trademark. The “standard Chinese words” refers to the Chinese words in the “Common Standard Chinese Characters Table”, but not including the traditional characters. The food labels can use both standard Chinese characters and the corresponding traditional Chinese characters at the same time.

**13. Relating to the use of “all kinds of artistic characters with decorative functions”**

“All kinds of artistic characters with decorative functions” include seal characters, official script, cursive script, handwritten characters, artistic characters, variant words, ancient characters, etc. While using these artistic characters, it shall be written in a correct manner with ease of recognition and not being easily confused.

**14. Relating to the corresponding relationship of Chinese and foreign languages in the label**

The pre-packaged food labels can use foreign languages at the same time. However, the word size of the foreign language shall not be larger than the corresponding size of the Chinese characters.

For the mandatory identification contents in this standard and other laws, regulations, food safety standards requirements, the Chinese and the foreign languages must have a corresponding relationship.

**15. Relating to the labeling requirement of the maximum surface area bigger than 10cm<sup>2</sup> but equal and smaller than 35cm<sup>2</sup>**

The food labels shall display all mandatory contents according to the requirements of this standard. According to the comprehensive situation of the label area, the height of the characters, symbols and numbers in the label contents shall be less than **1.8mm**. They shall be clear, concise and easily recognizable.

**16. When the mandatory contents contain both Chinese and alphabetic characters, how do you determine whether the character's height meets the character's height requirement of equal and larger than 1.8mm?**

The height of the Chinese characters shall be equal and larger than **1.8mm**. Units of **kg, mL**, etc. or other mandatory displayed characters shall determine whether to be equal and larger than **1.8mm** based on the upper case letters or lower case letters, such as **k, f, l**, etc.

**17. When the sales unit contains several pre-packaged food that can be sold independently, the labeling requirement of the external packaging (or large packaging) directly delivered to the consumers**

The independently-packaged food in such sales unit shall respectively display the mandatory contents. The labeling of the external packaging (or large packaging) shall be divided into two types of conditions:

One is the external packaging (or large packaging) shall display the mandatory contents according to the requirements of this standard. If the various food in the sales unit belong to different types, it shall display all mandatory contents for each type of food on the external packaging. The common information can be uniformly labeled.

Two is the several external packaging (or large packaging) shall be easily recognizable or identifiable, or all or part of the mandatory labeling contents within the packaging materials (or containers) can be clearly recognized or identified through the external packaging (or large packaging). It shall not repeat the corresponding labeling contents on the external packaging (or large packaging).

**18. When the sales unit contains several independently-packaged food that have displayed the manufacturing date and expiry date, how do you label the manufacturing date and expiry date on the external packaging**

It can choose one of the three types of labeling methods: One is the manufacturing date shall be labeled with the earliest manufacturing date of the single piece of food, while the expiry date shall be labeled according to the earliest expiry date of the single piece of food; two is the manufacturing date shall be labeled with the date on which the external packaging have become the sales unit, while the expiry date shall be labeled according to the earliest expiry date of the single piece of food; third is to respectively label the manufacturing date and expiry date of each food on the external packaging.

**19. Relating to the special names reflecting the authentic attributes of the food**

The special names reflecting the authentic attributes of the food are usually referred to the food names or food classification names stipulated in the national standards, industry standards and local standards. If there are several aforementioned names, it shall select any one of them, or equivalent name that does not cause ambiguity; under the condition where there are no standards provisions, it shall use the generic or popular names that can help the consumers to understand the authentic attributes of the food. It shall be able to reflect the inherent nature, characteristics and features of the food. Moreover, it shall distinctly show the intrinsic quality of the products and distinguish the effects of the different products.

**20. How to avoid the misunderstanding arising from the product names**

When the product name used contains words or terms (expressions) that can easily enable people to misunderstand the food attributes, it shall use the special name with the same font size placed near to the same display panel of the shown name to reflect the authentic attributes of the food. If the people easily misunderstand due to the different font sizes or font colors, it shall use the special name with the same font size and same font color to display the authentic attributes of the food.

**21. Relating to whether the single ingredient of the pre-packaged food shall be declared in the ingredient table**

The single ingredient of the pre-packaged food shall be declared in the ingredient table.

**22. Relating to the separation method for the ingredient names**

The declaration of the ingredients in the ingredient table shall be clear and concise, easily recognizable and identifiable. The ingredients can be separated by a comma, semicolon, space, etc. for easy identification.

**23. Relating to the implication and labeling requirements of the edible packaging**

The edible packaging is made from food. It refers to the substances that are edible and possess certain packaging functions. These packaging are easily ingested together with the packaged food. As such, it shall display their raw materials in the food ingredient table. For those edible packaging that have the corresponding national standards and industry standards, when the added amount is less than **25%** of the total amount of the pre-packaged food, it shall be exempted from displaying the original ingredients for such edible packaging.

**24. Relating to the labeling of the collagen casing for sausages**

The collagen casing for sausages belong to the food compound ingredients, which have the corresponding national standards and industry standards. According to the provision of **4.1.3.1.3** of the “General Rules of Pre-packaged Food Labels”, (**GB 7718-2011**), if the added amount of the collagen casing for sausages is less than **25%** of the total amount of the meat product, the labels can be exempted from displaying the original ingredients for the collagen casing.

**25. While determining the sequence of the ingredient labels in the food ingredient table, which unit shall be used to calculate the added amount of the ingredients**

It shall be based on the mass or weight of the food ingredients being added. It shall sequence them one by one in a descending order. If the percentage of the mass added (**m/m**) does not surpass **2%** of the ingredients, it can be exempted to be sequenced in a descending order.

**26. Relating to the labeling of compound ingredients in the ingredient table**

The labeling of compound ingredients in the ingredient table shall be divided into the following two conditions:

- (1) If the compound ingredients that are directly added to the food already have national standards, industry standards or local standards, and the added amount is less than **25%** of the total amount of the food, it shall not need to display the original ingredients of the compound ingredients. For the added amount of the compound ingredients that contain food additives is less than **25%** of the total amount of the food, if it meets the principles of the provisions of “Usage Standards of Food Additives”, (**GB 2760**), and it is not technically effective in the finished product, it shall not need labeling. However, for the food additives are technically effective in the finished product, the compound ingredients shall be labeled accordingly. The recommended labeling methods are as follows: Add brackets (parentheses) after the compound ingredient name, and show the generic names of the food additives in the brackets, e.g. soy sauce (contain caramel color).
- (2) If the compound ingredients that are directly added to the food do not have national standards, industry standards or local standards, or the compound ingredients already have national standards, industry standards or local standards and the added amount is more than **25%** of the total amount of the food, it shall display the names of the compound ingredients in the ingredient table and add brackets (parentheses) after them, displaying the original ingredients of the compound ingredients one by one in a descending order based on the added amount. Among them, if the added amount of the ingredients does not surpass **2%** of the total amount of the food, it shall not be required to be sequenced in a descending order.

**27. For the compound ingredients that need to label their original ingredients, if part of the original ingredients are the same as their ingredients in the food, how do you label them?**

It can choose one of the following two types of methods: One is to refer to Question 26 (2) for the labeling instruction; two is to directly display each original ingredient for the compound ingredients in the ingredient table. The sequence of each ingredient shall be decided by the total amount of each ingredient in the finished product.

**28. Relating to the labeling methods of the generic names of food additives**

It shall display the generic names of the food additives in the “Usage Standards of Food Additives”, (**GB 2760**). On the label of the same pre-packaged food, the food additives used shall choose one of the following three types of formats: One is all shall display the full names of the food additives; two is all shall display the function classification names and the International Numbering System for Food Additives (**INS**). If a certain food additive is not listed in the corresponding **INS**, or due to the labeling requirements of allergens, it can display it with its full name; three is all shall display the function classification names of the food additives, and also display their full names simultaneously.

For example: The food additive, propylene glycol, can choose to be labeled as: 1. Propylene glycol; 2. Thickener (**1520**); 3. Thickener (Propylene glycol).

**29. Relating to the matters to be noted for the labeling of the generic names of food additives**

- (1) Food additives may have one type or many types of functions. The “Usage Standards of Food Additives”, (GB 2760), lists out the main functions of the food additives for reference. The manufacturing enterprises shall display the function classification names on the label according to the actual functions of the food additives in the food.
- (2) If the two or more names for a food additive are defined in the “Usage Standards of Food Additives”, (GB 2760), each name is an equivalent generic name. Take “sodium cyclamate (a.k.a. sweetener) as an example. “Sodium cyclamate” and “sweetener” are all generic names.
- (3) “Mono- and diglycerides of fatty acids (oleic acids, linoleic acids, palmitic acids, sorbic acids, stearic acids, lauric acids)” can be labeled as “mono- and diglycerides of fatty acids”, “mono-distearic glyceric acid” or “mono-stearic glyceric acids”, etc.
- (4) According to the labeling requirements of food allergens, it can enhance the description of the origin before the generic names stipulated in the “Usage Standards of Food Additives”, (GB 2760). For instance, “phospholipids” can be labeled as “soybean lecithin”.
- (5) According to the provisions of the “Usage Standards of Food Additives”, (GB 2760), aspartame shall be labeled as “aspartame (contains phenylalanine)”.

**30. Relating to the setting up of “food additive items” in the ingredient table**

The ingredient table shall be authentically displayed with all food additives used by the product. However, it is not mandatory to set up the “food additive items”. Food manufacturers shall choose any type in Appendix B for labeling.

**31. While adding two or more food additives with the same function, can you carry out the labeling together?**

For the adding of two or more food additives with the same function in the food, it can choose to respectively display the full names of each food additive; or choose to display the function classification names first, and thereafter, add brackets (parentheses) after them to display the full names or **INS** of each food additive. For example: It can label as “carrageenan, guar gum”, “thickener (carrageenan, guar gum)” or “thickener (407, 412)”. If a certain food additive has no **INS**, it can be labeled with its full name at the same time. For example: “thickener (carrageenan, sodium polyacrylate)” or “thickener (407, sodium polyacrylate)”.

**32. Relating to the labeling of compound food additives**

It shall fully display every food additive that has a functional effect on the finished product in the food ingredient table.

**33. Relating to the labeling of supplementary ingredients in food additives**

When the supplementary ingredients contained in the food additives do not display any functional effect on the finished product, they shall not need to be labeled in the ingredient table.

**34. Relating to the labeling of processing aids**

The processing aids shall not require to be labeled.

**35. Relating to the labeling of enzyme preparation**

If the enzyme preparation loses its enzyme activity in the finished product, it shall not require to be labeled. If it still retains its enzyme activity in the finished products, it shall be ranked in its corresponding position in the ingredient table according to the related provisions displayed in the food ingredient table as well as the added amount of the enzyme preparation during the manufacturing or processing of the food.

**36. Relating to the labeling of food nutrient strengthening agents**

Food nutrient strengthening agents shall be labeled according to the “Usage Standards of Food Nutrient Strengthening Agents”, (GB 14880) or the names stipulated in the announcement of the original Ministry of Health.

**37. Relating to the labels of the ingredients that can be used as food additives or food nutrient strengthening agents, and in other ingredients**

For the ingredients that can be used as food additives or food nutrient strengthening agents, and in other ingredients, they shall be uniformly labeled according to their functional effects on the finished product. When the ingredients are used as food additives, they shall be labeled with the names stipulated in the “Usage Standards of Food Additives”, (GB 2760); when the ingredients are used as food nutrient strengthening agents, they shall be labeled with the names stipulated in the “Usage Standards of Food Nutrient Strengthening Agents”, (GB 14880); when the ingredients have functional effects on other

ingredients, they shall be labeled with their corresponding full names. For example, monosodium glutamate (sodium glutamate) can be used as a condiment and a food additive at the same time. When it is used as a food additive, it shall be labeled as sodium glutamate. When it is used as a condiment, it shall be labeled as monosodium glutamate. For instance, riboflavin, Vitamin E, polydextrose, etc. can both be used as a food additive and a food nutrient strengthening agent. When they are used as a food additive, they shall be labeled with the names stipulated in the “Usage Standards of Food Additives”, (GB 2760); when they are used as a food nutrient strengthening agent, they shall be labeled with the names stipulated in the “Usage Standards of Food Nutrient Strengthening Agents”, (GB 14880).

#### **38. Relating to the labeling of strains present in the food**

The “Notice of the General Office of the Ministry of Health on the Issuance of the “List of Strains Used in Food” (Issued and supervised by the Ministry of Health (2010) No.65)” and the announcement No. 25 (2011) of the original Ministry of Health have respectively defined the “List of Strains” that can be used in food and infant food. For the pre-packaged food that have used the aforementioned strains, it shall declare the strain name according to the requirements of the “General Rules of Pre-packaged Food Labels”, (GB 7718-2011). The enterprises can also declare the corresponding strain numbers and strain contents on the pre-packaged food at the same time. Since **January 1, 2014**, food manufacturers shall declare the relevant strains on the pre-packaged food labels according to the aforementioned provisions. For those pre-packaged food that have been manufactured and sold prior to **January 1, 2014**, they can continue to use the existing labels and continue to be sold within the food expiry date.

#### **39. Relating to the quantitative labeling of ingredients or components**

One is if it reiterates the fact of having certain types or many types of ingredients or components with values and features on the food labels or user manuals, it shall declare their added amount or their contents in the finished product; two is if it reiterates the fact of having certain types or many types of ingredients or components and their contents are relatively low or not present, it shall declare their contents in the finished product at the same time.

#### **40. Relating to the situation of not requiring quantitative labeling of ingredients or components**

Only out of reflecting the authentic attributes requirements of the food in the food name, mentioning certain types of ingredients or components and not in particular reiterating on the label, it shall not require to declare the added amount of such types of ingredients or components or their contents in the finished product. When reiterating the food flavors, it shall also not be required to declare their quantities.

#### **41. Relating to the labeling of sulfur dioxide in the grape wines**

According to the provisions of the “General Rules of Pre-packaged Food Labels”, (GB 7718-2011), “Fermented Alcoholic Beverages and their Integrated Alcoholic Beverages”, (GB 2758-2012) and their implementation time, it allows the grape wine that have used the food additive, sulfur dioxide, prior to **August 1, 2013** to be declared as sulfur dioxide or a small amount of sulfur dioxide; for the manufactured, imported grape wine that have used the food additive, sulfur dioxide, after **August 1, 2013**, it shall be declared as sulfur dioxide, or a small amount of sulfur dioxide and content.

#### **42. Relating to the labeling of vegetable oil ingredient in the ingredient table**

When vegetable oil is used as a food ingredient, it can choose one of the following two types of labeling:

- (1) It shall fully declare the place of origin of the vegetable oil. For example: palm oil, soybean oil, refined soybean oil, sunflower seed oil, etc. It can also declare the corresponding names stipulated in the national standards, industry standards or local standards. If the vegetable oil used is formed by two or more vegetable oils from different sources, it shall be declared in a descending order according to the added amount.
- (2) It shall be declared as “vegetable oil” or “refined vegetable oil” and determine its position in the ingredient table according to the total amount added. If the vegetable oil used are hydrogenated and have the relevant national standards, industry standards or local standards for the product, it shall be labeled as “hydrogenated vegetable oil” or “partially hydrogenated vegetable oil”, and declare the corresponding product standard name.

#### **43. Relating to the labeling of edible flavors and edible spices**

For the food that use edible flavors and edible spices, they shall declare the generic names of such flavors and spices in the ingredient table. They can also be labeled as “edible flavors”, or “edible spices”, or edible flavors & spices”.

#### **44. Relating to the labeling of spices, spice-type or compound spices as food ingredients**

- (1) If the added amount of a certain type of spices or spice extracts surpasses **2%**, it shall declare its full name.



- (2) If the added amount of the spices or spice extracts (single or total) does not surpass **2%**, it shall declare the full name of each spice in the ingredient table. It shall also uniformly declare as “spices”, “spice-type” or compound spices” in the ingredient table.
- (3) If the added amount of compound spices surpasses **2%**, it shall carry out the declaration according to the labeling method for compound ingredients.

**45. Relating to the labeling of dried and preserved fruits in the ingredient table**

- (1) If the total amount of each type of dried fruits or preserved fruits added does not surpass **10%**, it shall declare the full names of each type of dried fruits or preserved fruits in the ingredient table, or uniformly declare as “dried fruits” and “preserved fruits”.
- (2) If the total amount of each type of dried fruits or preserved fruits added surpasses **10%**, it shall declare the full names of each type of dried fruits or preserved fruits added.

**46. Relating to the labeling of net weight**

The net weight label is formed by the net weight, numbers and statutory units of measurement. The labeling position shall be at the same display panel of the food name in the packaging or container. The height of all characters (measured by the letters – **L, k, g**, etc.) shall comply with the requirements of **4.1.5.4** of this standard. The “Net Weight” can be separated from the numbers after it by using a space or colon or other symbols. The “statutory unit of measurement” can be classified as the volume unit and mass unit. Solid food can only declare the mass unit, while liquid, semi-solid and sticky food can choose to declare the volume unit or mass unit.

**47. Labeling of net weight of the pre-packaged food in a gift package or promotional package**

The net weight of the pre-packaged food in a gift package (or promotional package) shall be labeled according to the provisions of this standard. It shall respectively declare the net weight of the sales portion and the net weight of the gift portion. It shall also declare the total net weight of the sales portion and the gift portion. In addition, it shall also declare the net weight of the gift portion with an appropriate method. For instance, “Net Weight **500g, 50g Free**”, “Net Weight **500+50g**”, “Net Weight **550g (50g free)**”, etc.

**48. Relating to the labeling of solid contents that do not clearly differentiate between the products in solid and liquid states**

For the pre-packaged food that use substances in solid and liquid states as well as substances in the solid state as the main food ingredients, it shall declare the contents of the drained substance (solid substances) in the mass unit or fraction of mass unit near to the position of the “Net Weight”.

For the pre-packaged food that use semi-solid, sticky food and substances in the solid and liquid states as the main food components, or exist in the suspension state, mixed solid and liquid states, etc. that do not clearly differentiate between the products in the solid and liquid states, it shall not require to declare the contents of the drained substances (solid substances). Due to its own characteristics, the pre-packaged food may exist in the different solid, liquid states in different temperatures or under other conditions. The pre-packaged food do not belong to the food in solid and liquid states. For example, honey, edible oil and other products.

**49. Relating to the labeling of specifications**

If the specifications of a single pre-packaged food are equivalent to the net weight, it shall not be required to declare the specifications. For the comprehensive labeling methods, refer to **C.2.1 of Appendix C**; if the pre-packaged food contain several pre-packaged food of the same type, refer to **C.2.3 of Appendix C** for the comprehensive labeling methods for net weight and specifications; if the pre-packaged food contain several pre-packaged food of different types, refer to **C.2.4 of Appendix C** for the comprehensive labeling methods for net weight and specifications.

While declaring “specifications”, it is not mandatory to declare the word, “specifications”.

**50. Relating to the place of origin in the standard**

The “place of origin” refers to the actual manufacturing address of the food. It is a supplement to the manufacturer’s address under special conditions. If the address of the manufacturer is the actual place of origin of the product, or the manufacturer is in the same place, city, region with the legal representative, it is not mandatory to declare the “place of origin”. In the following situations, it shall label the “place of origin” at the same time: One is for the products that are manufactured by the subsidiaries or manufacturing bases of the company and they only declare the name and address of the legal company, it shall declare the subsidiary or local place of the manufacturing base that actually manufactures such products under the “place of origin” item; two is for the products that have authorized other companies to manufacture and they only declare

the name and address of the appointed company, it shall declare the local place of the appointed company under the “place of origin” item.

**51. If the company has ratified an Authorization of Processing Agreement with its subsidiary and the products manufactured by the subsidiary are not for sales, how do you label the name, address and place of origin of the manufacturer and operator?**

It shall be labeled according to the authorization of processing method between the food manufacturers and operators.

**52. Relating to the prefecture-level city in the standard**

The place of origin of the food can be labeled as the municipality directly under the central government, separate planned city, vice-provincial city or prefecture-level city according to the administrative division. The definition of prefecture-level city shall be executed according to the related state provisions.

**53. Relating to the labeling of contact method**

The contact method shall be labeled as the effective contact method of the legally liable manufacturers or distributors. The contact method shall contain at least one of the following items below: telephone number (hotline, after-sales number or sales number, etc.), facsimile, email and other internet contact methods, postal address (postal code or P.O. box) declared together with the address.

**54. Relating to the labeling of the grading of quality**

If the food are clearly stated with quality grading within the national standards and industry standards, it shall declare the quality grading according to the standard requirements. The product classification and product category do not belong to the grading of quality.

**55. Relating to the situation of exempted labeling**

There are two scenarios for the exemption of declaration in this standard: One is the definition of the types of food that can be exempted from declaring their expiry dates; two is the definition of the exemption of labeling contents when the maximum surface area of the food packaging or packing container is less than **10cm<sup>2</sup>**. These two scenarios have respectively considered the characteristics of the food themselves and the difficulty in declaring a large amount of contents in such a small label. Exemption is only an indication that it is not mandatory to carry out the labeling. However, the enterprise can have a choice whether to do the labeling or otherwise.

The “solid edible sugar” in the exemption clause of this standard refers to white sugar, soft, white sugar, brown sugar, ice sugar, etc., but not including candy.

**56. How do you declare the food labels of imported pre-packaged food**

The food labels of the imported pre-packaged food can use Chinese and foreign language at the same time. It can also use traditional Chinese simultaneously. In the “General Rules of Pre-packaged Food Labels”, (**GB 7718-2011**), it is mandatory to require to fully declare all contents. It is an option whether to declare the contents of the recommended labeling. When the pre-packaged food are using Chinese and foreign language at the same time, the foreign language must have a corresponding relationship with the mandatory labeling contents in Chinese as well as the contents selected for declaration. That is, the significance and meaning in Chinese and foreign language must be fundamentally consistent. The word size of the foreign language shall not be bigger than the Chinese character size of the corresponding Chinese. For the imported food with special packaging shapes, the height of the Chinese characters shall not be lower than the word height of the corresponding content in foreign language on the same display panel.

In the situation where the labeling is carried out by pasting the Chinese labels on the external packaging of the original imported pre-packaged food, the pasting of Chinese labels shall be declared according to the methods stipulated in the “General Rules of Pre-packaged Food Labels”, (**GB 7718-2011**); the graphics and symbols of the original labels in foreign language shall not contain contents that are in violation with the related laws and regulations of the “General Rules of Pre-packaged Food Labels”, (**GB 7718-2011**).

The contents of the ingredient table in foreign language of the imported pre-packaged food shall contain the corresponding contents of the ingredient table in Chinese. If the original products are not declared in the ingredient table in foreign language, the contents that shall be declared according to the Chinese laws, regulations and standards, shall also be declared in the ingredient table in Chinese (including the added water, single raw materials, etc. during the food manufacturing and processing processes).

The imported pre-packaged food shall be labeled with the country of origin or the name of the place of origin as well as the names, addresses and contact methods of the dealers, importers or distributors legally registered in China; it shall not be

required to declare the names, addresses and contact methods of the manufacturer. The names, addresses, etc. of the original manufacturer in foreign language shall not be required to be translated to Chinese.

The country name or regional name of the country of origin of the imported pre-packaged food refers to the country or regional name where the food has become the finished product, including the country or regional name of the packaging (or canned). The Chinese labels for the imported pre-packaged food shall truthfully and accurately declare the country name or regional name of the country of origin.

The imported pre-packaged food shall be exempted from declaring the standard codes and quality grades of the relevant products. If the standard codes and quality grades of the product are declared, they shall ensure their authenticity and accuracy.

**57. If the imported pre-packaged food only have the expiry date and the best consumption date, how do you label their manufacturing date?**

It shall truthfully label the manufacturing date by pasting, reprinting, etc. according to the expiry date and best consumption date.

**58. Relating to the prohibition of pasting, reprinting or tampering with the date labels**

The clause 4.1.7.1 of this standard, “the date labels shall not be pasted, reprinted or tampered with” refers to the behavior of tampering with the date in a single-handedly manner by pasting, reprinting and other methods on the existing labels. If the entire food label is made in a self-adhesive form, including the date contents such as “manufacturing date” or “expiry date”, etc., the entire self-adhesive pasting on the food packaging shall meet the provisions stipulated in this standard.

**59. By using the text, “see packaging”, while labeling the date, is it necessary to indicate the actual position of the packaging?**

It shall be divided into the following two scenarios: One is if the size of the packaging is relatively big, it shall indicate the actual position of the date on the packaging; two is for small food packaging, it can adopt the forms such as “for manufacturing date, see packaging”, “for manufacturing date, see sprayed codes”, etc. The aforementioned requirements are aimed at enabling the consumers to find the date information in a convenient way.

**60. Relating to the labeling of product standard codes**

It shall declare the standard codes and sequential numbers implemented by the product. It shall not be required to declare the year number. The product standard can be referred to as the National Food Safety Standards, Food Safety Local Standards, Food Safety Enterprise Standards or other national standards, industry standards, local standards and enterprise standards. The title can use, but not limited, to these forms: product standard number, product standard code, product standard serial number, product implemented standard number, etc.

**61. Relating to the identification of green food labels**

According to the provision of 4.1.10 of the “General Rules of Pre-packaged Food Labels”, (GB 7718-2011), the pre-packaged food (excluding imported pre-packaged food) shall declare the standard codes implemented by the product. Standard code refers to the standard involved with the product quality, specifications and other contents implemented by the product in the pre-packaged food. It can be the National Food Safety Standards, Food Safety Local Standards, Food Safety Enterprise Standards, or other relevant national standards, industry standards and local standards. According to the provisions of the “Administrative Measures for Green Food Labels” (Ministry of Agriculture Order No. 6, 2012), for the enterprises that use the green food labels on their product packaging, it goes to say that the enterprise has committed that the product meets the green food standards. The enterprise can declare the green food standards implemented by the product. It can also declare the other standards implemented in its production process.

**62. Relating to the labeling of allergens**

Certain raw materials or components in the food may cause an allergic reaction for a certain group of people after they have ingested them. One of the effective prevention is to declare the allergens contained or may contained in the food in a food label so as to remind the consumers that have medical allergies to appropriately choose their food. With reference to Codex Alimentarius, this standard has listed 8 types of allergens, encouraging the enterprises to voluntarily declare such information to remind the consumers and effectively fulfil the social responsibility. For the other allergens not listed within the 8 types of allergens, the manufacturer can choose whether or not to declare such allergens. The food manufacturer and operator can refer to the followings to autonomously select the comprehensive labeling methods.

The allergens can be directly labeled using easily identifiable ingredient names in the ingredient table. For example, milk, egg powder, soybean phospholipid, etc.; it can also choose to put a reminder at a position near to the ingredient table. For instance, “contains ... ..”, etc.; for the ingredients that do not contain certain types of allergens, but the same workshop

or the same production line still manufacturers other food that contain such allergens, making it possible to introduce the allergens to such food, it can use “may contain ... ..”, “may contain a small amount ... ..”, “these production equipment also process the food that contain ... ..”, “these production lines also process the food that contain ... ..” and other methods to declare the allergen information at a position near to the ingredient table.

**63. Relating to the calculation of the maximum surface area of the packaging or packaging container**

Appendix A defines the calculation methods for the maximum surface area of the packaging or packaging container. Among them, A.1 and A.2 respectively define the calculation methods for the maximum surface area of the rectangular and cylindrical shapes. It is a calculation method based on the regular shape (volume). A.3 defines the calculation method for irregular shapes (volumes). It shall abide by these for implementation while calculating the maximum surface area of the packaging or packaging container.

**64. Relating to the calculation of irregular surface area of the packaging of the pre-packaged food**

The packaging or packaging container of the food with irregular shapes shall have a flat or nearly flat surface as the main display panel and the surface area of such panel shall be the maximum surface area. If there are many flat or nearly flat surfaces, it shall pick out the one with the largest surface area as the main display panel; if these flat or nearly flat surfaces are also very similar to each other, it shall autonomously select any one of them as the main display panel. The total surface area of the packaging calculated can be determined prior to the placing of the product into the packaging. However, it shall remove the dimensions occupied by the margin and the non-printable texts.

**65. Relating to Appendix B of the standard**

When the food manufacturer declares the food additives in the ingredient table, it shall choose a type of labeling method in Appendix B. Appendix B uses comprehensive examples to concisely explain the different labeling methods for the food additives in the ingredient table. Food manufacturers and operators can choose any one of the following types to declare the ingredient table according to the food characteristics. However, there is no special requirement for the method of separation and punctuation between each ingredient in the ingredient table.

**66. Relating to Appendix C of the standard**

Appendix C collates several examples of the recommended labeling forms under the labeling item. When the food manufacturer declares the corresponding labeling items, it shall maintain consistency on the fundamental meaning with the recommended forms. However, the expression method of the wordings, selection of punctuation, etc. shall not be restricted to the form in the examples.

Appendix C uses a lot of examples to clarify on the labeling forms of net weight and specifications, date, expiry date and storage conditions. Food manufacturers and operators can choose any one of the following types according to their needs. However, the form may not be exactly the same as those listed in the examples. It can also make appropriate amendments and modifications to the recommended forms according to the characteristics of the food or packaging and under the condition of not changing the fundamental meaning and significance.

**67. Relating to how to implement the standard**

Prior to the implementation date of this standard, it allows and encourages the food manufacturers and operators to implement such standard. To save on the resources and avoid wastages, they can still continue to use the food labels that meet the requirements of the original “General Rules of Pre-packaged Food Labels”, (GB 7718-2004), prior to the implementation date. After the implementation date of this standard, food manufacturers must implement this standard. However, the food, that are using the old food labels prior to the implementation date, can still continue to be sold within the expiry date of the product.