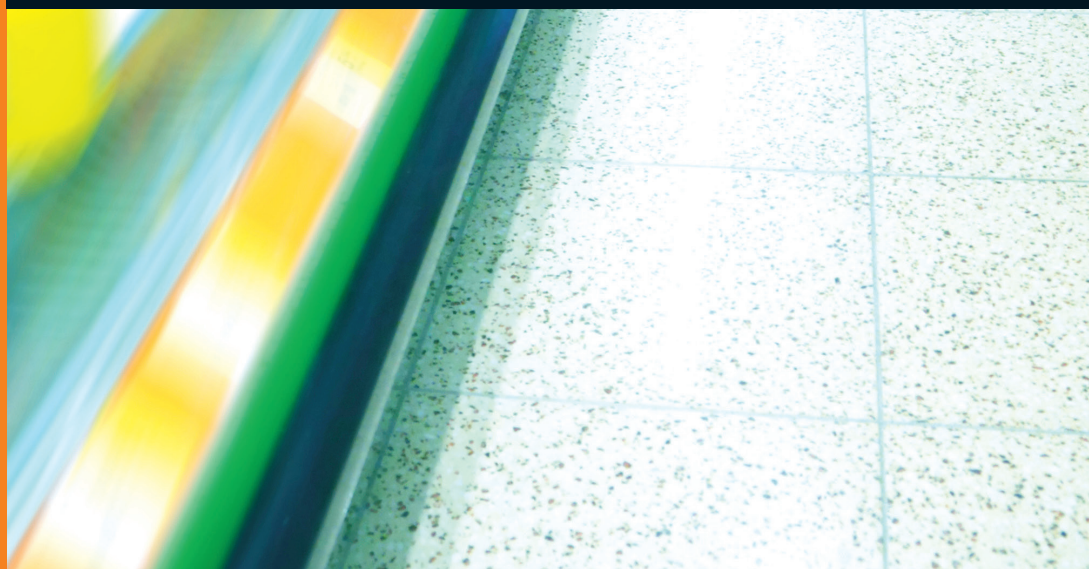




# INDUSTRY GUIDELINE & TOOLKIT

Voluntary Front-of-Pack Nutrition Labelling  
for the Food & Beverage Industry in Asia



# CONTENTS

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# INDUSTRY GUIDELINE & TOOLKIT

## VOLUNTARY FRONT-OF-PACK NUTRITION LABELLING FOR THE FOOD & BEVERAGE INDUSTRY IN ASIA

### INTRODUCTION

FIA Commitment	02
Mission and Scope	02
Application	03
General Principles	03

### STYLE GUIDE

#### SECTION 1

Minimum Commitment	04
Placement	04
GDA Label Specifications	04
Elements of the GDA Label	05
Language	06
The Use of Colour	06
Minimum Size and Shape	06
Numerical Values	07
Serving / Portion Size	07
Calculating % GDA Values for Energy	07

#### SECTION 2

Optional Extra Nutrients	08
Values and GDA Percentages	09
Back-of-pack Nutrition	
Information Panel	09
Variance Issues	10
Multipacks	10
Reference Intake Values for GDA	10
Position and Order for	
Multiple GDA Icons	11
Extended Options	12
Exemptions and Exceptions	12





### **FIA is a non-profit industry association**

that represents and promotes the views of leading food and beverage companies throughout Asia.

Our members share a common vision on food safety, regional development and the promotion of balanced diets and lifestyles in relation to their products. Together, we work with multiple stakeholders to encourage positive dialogue on food issues and co-development of science-based policies.



### **FIA COMMITMENT TO ENHANCING NUTRITION LITERACY IN ASIA**

FIA members are committed to providing practical and easy-to-understand nutrition information for all consumers in Asia. They believe, individually and collectively that the provision of consistent nutrition information forms the cornerstone of any policy framework to promote healthy food choices. Nutrition literacy in all populations can be achieved most readily through a harmonised, science-based labelling scheme, coupled with an equally united commitment on education and promotion of physical activity. To that end, FIA has urged all stakeholders to rally behind a single, consistent labelling approach across Asia.

### **MISSION AND SCOPE OF THIS GUIDELINE**

Since 2010, FIA has played a key role in identifying the best way forward to ensure appropriate nutrition information for consumers, while also maintaining an open and competitive market for businesses. To promote this objective, FIA has adopted a Common Nutrition Labelling Guideline that has been adopted by food and beverage companies across Asia on a voluntary, self-regulatory basis.

The guideline is based on successful and widely adopted schemes for nutrition labelling in Europe, the US and Australia. It provides practical information on the front of pack (or where this is not possible in an alternative site) based on a serving of the food or beverage.

FIA believes that this Common Nutrition Labelling Guideline is a positive step by the food and drink industry in helping to deliver consistent, practical and useful nutrition information to consumers to allow them to make informed choices. Furthermore, it has the potential to achieve a rapid increase in nutrition labelling across the food, beverage and hospitality industries as has been seen in other parts of the world.



## APPLICATION

This document serves as a framework commitment, intended to provide a common point of reference for companies while allowing them to take into account the specific constraints and requirements of each market where they operate.

Companies are strongly encouraged to commit voluntarily to the basic standards set forth in this guideline, i.e. to implement at least front-of-pack (FOP) labelling for energy with the percentage of Guideline Daily Amount (GDA) for energy per serving, consistent with any requirement imposed by national regulations. At the same time, they may – and often do – go beyond this minimum standard if permitted locally by prevailing national regulatory requirements, consumer demand and product portfolios. The attached style guide provides additional guidance for companies wishing to provide more than the recommended minimum FOP energy label.

All other companies in Asia, large and small are urged to implement this guideline on a voluntary basis. To this end, FIA has pledged to work with industry associations and governments throughout Asia to provide a network of practical support and encouragement.

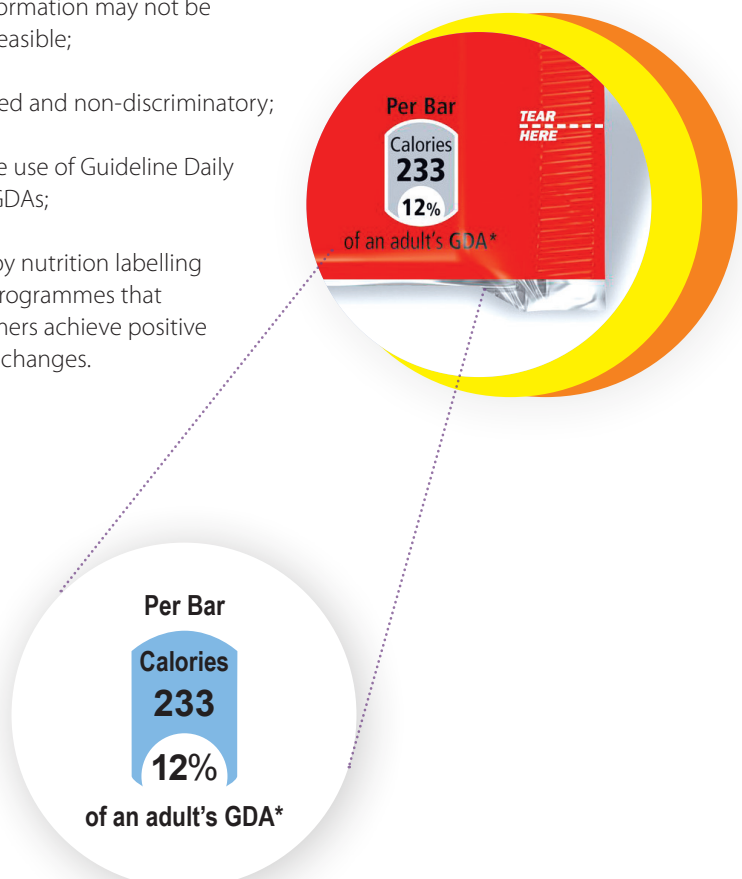
## GENERAL PRINCIPLES

The **Common Nutrition Labelling Guideline** is based on a set of general principles that have been adopted by FIA members.

The scheme is voluntary for all manufacturers and retailers, with support for its implementation provided by national trade associations in each country. It is intended to result in nutrition labelling that is:

- Clear, meaningful and understandable, thereby empowering the consumer to make informed dietary choices;
- Applied in a consistent manner - recognising that for some products, full nutrition information may not be relevant or feasible;
- Science-based and non-discriminatory;
- Based on the use of Guideline Daily Amounts - GDAs;
- Supported by nutrition labelling education programmes that help consumers achieve positive behavioural changes.

The guideline sets out a front-of-pack design option based on energy, using calories as the unit of measure, and a reference value based on Guideline Daily Amounts (GDAs). This is applicable in all markets where the national regulatory requirements are not conflicted. However, where national regulations prescribe alternative units of measure such as joules, these can be substituted in the design without diluting the intent of providing consistent front-of-pack consumer information about energy as consumed. This principle would also apply to nutrient reference values where they are mandated.



# STYLE GUIDE

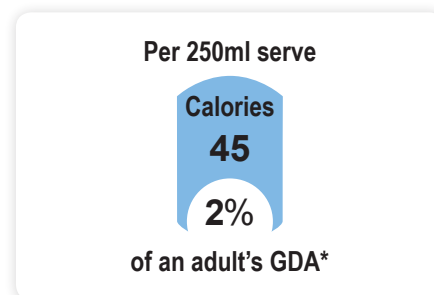
## FOR THE DESIGN AND APPLICATION OF GUIDELINE DAILY AMOUNT (GDA) LABELS

FIA has developed this style guide as a practical resource to assist companies with the implementation of voluntary front-of-pack (FOP) nutrition labels showing the percentage of the average adult Guideline Daily Amount (GDA) while ensuring pan-industry provision of consistent accurate information for consumers. The preferred format is described in the following sections.

## SECTION 1

### MINIMUM COMMITMENT: FRONT-OF-PACK LABEL FOR 'ENERGY'

As a minimum, companies are asked to voluntarily provide front-of-pack (FOP) information for energy. This information should be displayed in Calories (kcal) per serving, with the percentage (%) of the adult GDA per serving. This option may be varied *only* if it conflicts with national regulations in the country of sale or the country of origin. Companies should strive to honour the spirit of the guideline at all times.



### PLACEMENT OF GDA - FOR ALL PACKAGED FOOD & BEVERAGES

The GDA icon should be placed on the front-facing panel of the food or beverage pack. For some special packaging, alternative placement may be considered as long as it is consistent with the principle that the icon appears on the face of the pack that is most clearly visible to the consumer.

### GDA LABEL SPECIFICATIONS

This section outlines the visual identity requirements for designers and printers. The recommended format is outlined on the left.

The GDA icon is intended to be used on the retail item (barcoded) packaging. It may also be used on labels for fresh value-add products (which may also be barcoded) and displayed in association with fresh, unpackaged products for retail sale.

In the food service environment, the GDA icon(s) may be applied to menu boards, tray mats or other in-situ collateral where the relationship to the product (as served) can be clearly and consistently maintained.

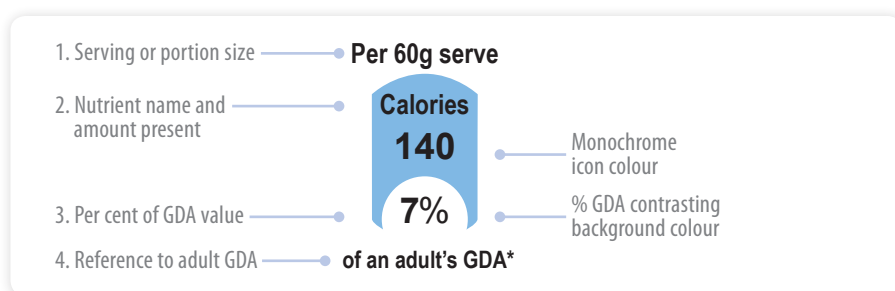
## ELEMENTS OF THE GDA LABEL

The elements that should be displayed and the required order are listed as follows:

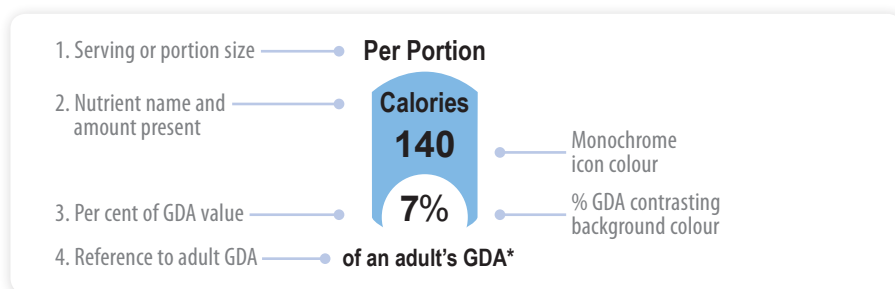
1. **The nominated serve size**  
expressed in grammes (g), millilitres (ml), or declared as 'per portion' if the contents of the entire package are intended to be consumed in one sitting.
2. **The word 'Calories'** and the amount in kcals. Alternatively, where national regulations require the declaration of kilojoules, the word used in the label should be 'Energy' and the text 'KJ' is placed next to the numerical value.
3. **The percentage** that this amount represents – based on the daily Nutrient Reference Value. For example, if a product provides 200 Calories per serving, this would be equivalent to 10% of the GDA of 2000 kcals/day.
4. **Reference** to the fact that the percentage is based on an adult's guideline daily amount. An asterisk may be used to refer to additional information elsewhere on the pack.



Where the pack contains more than one serve.



Where the full pack is intended to be consumed in one sitting.





## LANGUAGE

When accommodated by prevailing national regulations, the elements should either be in English, or in the language of the country in which the product is to be marketed. Note that in some countries such as Thailand, the use of GDA requires labels to be in the official national language. The display of the GDA in English is the preferred option only when no national requirement is prescribed. For example the Thai GDA, which is consistent with the design elements of the GDA guide but is required to be in the Thai language.

### Local country variations

This icon is an example of an FOP label design adapted to both the language and regulatory requirements in China, which specify the use of NRV and the use of kilojoules for energy rather than kilocalories.



## THE USE OF COLOUR

For the purpose of the illustrations in this guide, a blue with white background has been used. Companies may adopt other colour schemes such as black/white provided that the GDA icon is a strongly contrasting colour from the rest of the label or pack and the percentage GDA is clearly visible and differentiated from the nutritional value.

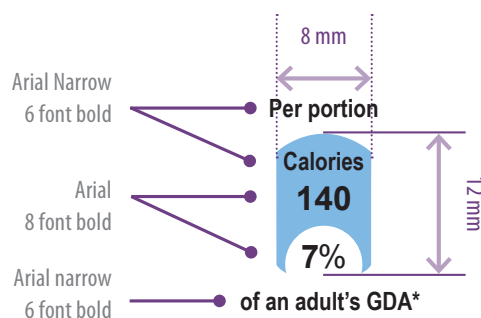
Where multiple nutrients are displayed in addition to energy (see section 2), the same monochromatic colour background is to be used in all icons. The use of hue, tone or tint to differentiate between icons is strongly discouraged as too is the use of green, amber or red, except in the case where these colours form the primary colour of the packaging. Icon colour should not interfere with icon legibility.

## MINIMUM SIZE AND SHAPE

The minimum width of a single GDA icon for each nutrient should be not less than 8mm and the height not less than 12mm. Larger sizes are permitted provided they are scaled proportionately and the text is also scaled proportionately.

The text above and below the icon should be no smaller than Arial Narrow 6 bold.

The numbers within the GDA icon should be replaced with Arial 8 bold.



## NUMERICAL VALUES

Individual values should be consistent with values recorded in the Nutrition Information Panel (NIP) or elsewhere on the pack, allowing only for small variances due to rounding.

The preferred depiction for energy is Calories, (kilocalories) and the amount should be reported as a whole number. Where national regulations require kilojoules to be stated, the term 'Energy' rather than Calories should be used, and the value reported should be followed by 'KJ'.

The following general guidance applies where no national regulations exist to the contrary. The values for Calories (or kilojoules) should be reported in whole numbers only, with standard rounding rules applied. For values that are detectable at very small or trace levels, a less than symbol (<) may be used: i.e. < 40 Calories (<170KJ).

## SERVING / PORTION SIZE

The serving or portion size should be consistent with any reference elsewhere on pack or associated with the product (including the Nutrition Information Panel if present). It is the company's responsibility to determine the serving or portion size for a food or drink product in line with relevant national guidelines/regulations. A single serving should reflect the amount of product that can be reasonably (or is customarily) consumed in a single eating or drinking occasion.

As a general guide, servings or portions should be based on whole numbers. This avoids impractical fractions of a portion, which cannot be easily interpreted by consumers.

## CALCULATING % GDA VALUES FOR ENERGY

Individual % GDA values are based on the energy content per nominated serve of product expressed as a percentage of the reference daily intake amount. For the Energy GDA, this is 2000 kilocalories per day.

The % GDA should be calculated on the actual value of the energy present in the product and then rounded to the nearest whole number. This will avoid creating compounded errors if the rounded nutrient value is used to determine the GDA percentage.

The percentage of 2000 Calories per day should be rounded up or down to the nearest one per cent, always rounding up for midpoint values of 0.5.



# STYLE GUIDE

## SECTION 2

### OPTIONAL EXTRA NUTRIENTS: E.G. SUGARS, FAT, SODIUM

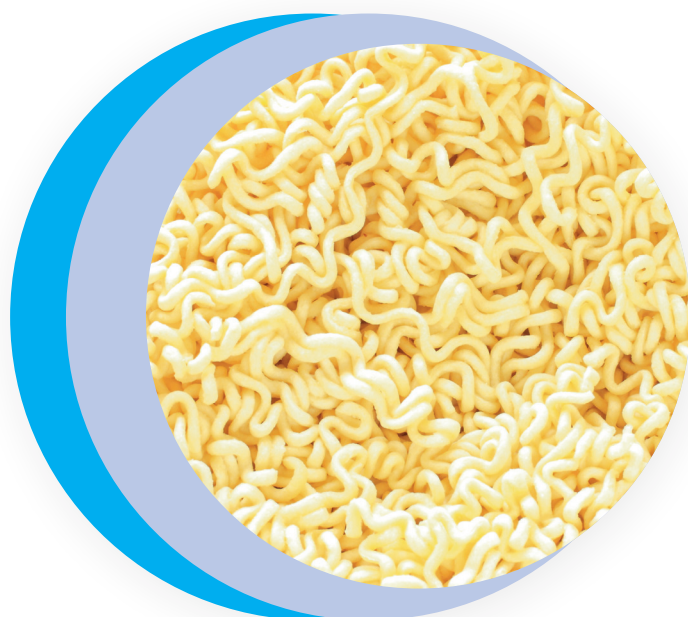
If a company wishes to provide additional nutritional information beyond that of the minimum Energy GDA, this should be consistent with the design principles in Section 1.

In this instance, values for Energy, Sugars, Fat, Sodium should be depicted before any other nutrients and the values for Fat and Sugars should refer to total fat and total sugar. In some countries, there may be an additional national requirement to include saturated fat.

As with Energy, the reference daily intake used to determine the % GDA should comply with relevant national standards and, where there is no national standard then the European Daily Value for adults should be used (see Page 11).

For further nutrients, other authoritative sources should be used to establish the appropriate average adult daily intake, such as Codex Alimentarius. However, Energy, Sugars, Fat and Sodium should always be listed before other nutrients.

As a general rule, if two or more of the additional nutrient values are zero, it may be preferable to use only the single energy icon rather than potentially confuse consumers. For example, for a product such as olive oil that has a very high fat content and no sugar or sodium, it may be better to simply state the energy content per serve on the front of pack.





## VALUES AND GDA PERCENTAGES FOR ADDITIONAL NUTRIENTS

If a company chooses to report optional additional nutrients (Sugars, Fat and Sodium) in addition to Energy, the value of the nutrients (Sugars, Fat and Sodium) should be expressed in grammes to two significant figures and rounded up or down to the nearest decimal value when less than 10g. When the value is detectable as a trace level less than 0.1g, then it should be rounded down and reported as 0g, unless national regulation requires that it be reported using a 'less than' sign.

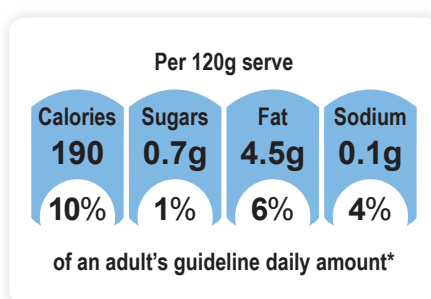
In some countries, national regulation may not permit rounding down and reporting a value of 0g when there is even the smallest detectable trace level, in which case it is necessary to report this as <0.1g, despite the amount present being very nearly zero.

(i.e. 934.5g = 935g; 4.432g = 4.4g; 0.075 = 0.1g; 0.025g = 0g, or <0.1g)

The % GDA for the nutrients should be calculated on the actual value of the nutrient present, rather than the rounded value, as this will avoid creating compounded errors. The GDA percentage is then rounded to the nearest whole number as mentioned above.

When the GDA percentage is less than 1, and the value falls between 0.5 to 1, then it should be rounded up and reported as 1%; if the value is less than 0.5, then it should be rounded down and reported as 0%, except where contrary to national regulatory requirements. i.e: 1.5% = 2%, 1.45% = 1%, 0.4% = <1%, or 0%.

Where required by national regulations, trace level values of less than 0.5% can alternatively be represented with a 'less than' sign in front of the 1%, rather than reporting 0% (i.e. <1%) if regulatory requirements require a value of 0% to have no detectable level.



## BACK-OF-PACK NUTRITION INFORMATION PANEL (NIP)

The energy per serving and % GDA information on the front of the pack should be consistent with any nutrition information on the back of the pack. However, it is noted that national regulations may impose specific requirements on significant figures, rounding rules and tolerances of figures stated in the NIP that are impractical for the FOP GDA, and therefore the values stated in the GDA and the NIP may not be identical. In some countries, the voluntary use of front-of-pack nutrition labels may trigger a requirement to provide the per cent of reference daily intake values in the NIP, and additional values may be required for other core nutrients in addition to energy.

Irrespective of whether the NIP contains per cent daily intake values or not, it remains the decision of the company as to whether to provide the extra FOP GDA icons in addition to the Energy, unless otherwise mandated by national requirements. In making this decision, achieving clarity for the consumer should be the primary objective.

## VARIANCE ISSUES

The nutrient composition of food ingredients can vary significantly, depending on seasonal variation, geographic considerations such as soil types, packaging and storage conditions. Companies need to be aware of this variation, and its potential magnitude when estimating average values and when estimating the margin of error in the estimate. GDA values should reflect those stated in the NIP, allowing only a small discrepancy for rounding up or down.

## MULTIPACKS

There are a number of options available for using the GDA on multipacks:

- If pack size is sufficient and the values between varieties do not differ appreciably, one set of GDA icons may represent the average GDA values of all the inner pack varieties. A statement should be made that they are average values of the multipacks.
- If a separate NIP is provided for each variety, separate GDA icons for each may also be applied, in which case the values should be consistent with the NIP values.

## REFERENCE INTAKE VALUES FOR GUIDELINE DAILY AMOUNT

The GDA icon provides the percentage daily amount of the recommended intake to help consumers understand what proportion of daily calories a product contributes when eaten as intended by the manufacturer. It also enables them to compare different products at the point of purchase and make an informed choice. The guideline daily amount for energy is 2000 kilocalories per day.

The labelling reference intake for energy or 2000 kilocalories per day corresponds to the recommended energy intake applicable to an average adult woman<sup>1</sup> to provide general guidance, while avoiding potential for excess consumption. This is not a target value, or a recommended amount. Higher energy intake values are quoted in nutritional references<sup>2</sup> for men and young children, and for high physical



<sup>1</sup> [gda.fooddrinkurope.eu/asp2/gda\\_label.asp](http://gda.fooddrinkurope.eu/asp2/gda_label.asp)

<sup>2</sup> <http://www.cnpp.usda.gov/Publications/DietaryGuidelines/2010/PolicyDoc/Appendices.pdf>

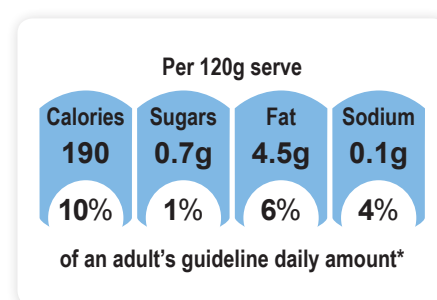
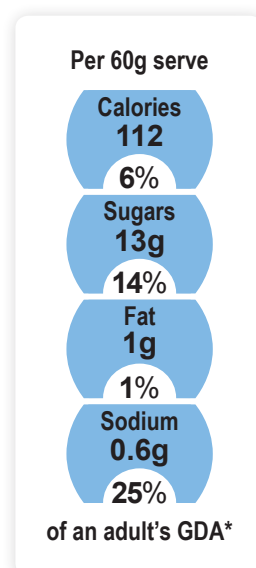
activity amongst all age groups and gender. People who are on a weight loss diet or who are mobility restricted, may need less. However, this is the value that is recognised by Codex Alimentarius, and is an appropriate value for the purpose of comparison and general guidance. Because people vary in different ways (age, gender, size and physical activity levels), GDAs simply provide a benchmark against which the contribution from various nutrients per serving of a food product can be roughly compared. The intention of providing GDA values is to also inform consumers about the relative nutritional content of a food in the context of the overall diet, and provides a tool in improving consumer nutritional awareness.

Generally, the nutrients defined for labelling and their reference values are globally coherent but may vary due to local Dietary Guidelines and local regulations. Where national reference values are specified and it is a legal requirement that these are used, then local reference values must be used in place of the GDA reference values. For the purpose of the GDA icon under this guideline, and in the absence of conflicting national regulations, it is recommended that the Guideline Daily Amounts specified in Europe be used to promote a high degree of consistency with the labelling system, especially across ASEAN. The following table provides a comparison of the reference values for the European and Codex values.

Nutrient	Europe <sup>3</sup>	Codex <sup>4</sup>
<b>Energy</b>	2000 kcal	2000 kcal or 8370 kJoule
<b>(total) Sugars</b>	90g	
<b>Total Fat</b>	70g	
<b>Sodium / Salt</b>	2.4g sodium or 6g salt	2.0g sodium

## POSITION AND ORDER FOR MULTIPLE GDA ICONS

When a company elects to provide more than the energy icon, the position of the group of icons on pack shall always be horizontal, except where the shape of the package requires the vertical option (e.g. cylindrical packs).



<sup>3</sup> Reference intake values for these and other selected nutrients, i.e. saturates, carbohydrates and protein, can be found in Annex XIII - Part B — Reference Intakes For Energy and Selected Nutrients Other Than Vitamins and Minerals, EC Regulation No 1169/2011: <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=CONSLEG:2011R1169:20111212:EN:PDF>

<sup>4</sup> Codex Guidelines on Nutrition Labelling, CAC/GL 2-1985.



## EXTENDED OPTIONS

GDA icons for additional nutrients are also permitted as an extension of the core nutrients option. The order of the energy and core four nutrients must be presented in the order specified above, with any additional nutrients following thereafter. It is not recommended that the energy icon alone is used with a single nutrient that is not one of the core four nutrients unless the core four nutrients are negligible in content and the additional nutrient is present at least to 10% of the recommended daily intake.



## EXEMPTIONS AND EXCEPTIONS

This Guideline excludes basic ingredients (unflavoured, unsweetened, no added ingredients) e.g. plain coffee, tea and water, and herbs and spices; or for products formulated for particular nutritional uses, such as infant and young children products or food for special medical purposes for which specific guidelines exist.

It may also be impractical to provide GDA labelling on some refillable containers due to the nature of the material or the potential for these containers to carry different lines of product. Additionally, very small packages with a printable label/pack surface area of no more than 100cm<sup>2</sup> may be exempt from this guideline due to space limitations. In these instances, companies will strive to provide nutrition information in alternative sites such as websites and point of sale fixtures. ■

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For more information, please visit [www.foodindustry.asia](http://www.foodindustry.asia) or contact [info@foodindustry.asia](mailto:info@foodindustry.asia).

