

Voluntary Report – Voluntary - Public Distribution

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Report Name: Hong Kong Confirms Use of Calcium Carbonate as a Coloring Food Additive

Country: Hong Kong

Post: Hong Kong

Report Category: Sanitary/Phytosanitary/Food Safety, Agricultural Situation, Export Accomplishments - Market Access

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Report Highlights:

Hong Kong's relevant food regulation contains a positive list of chemicals which are allowed for use as coloring matter. However, this positive list does not explicitly list calcium carbonate as an allowable coloring additive for food use. In this regard, the U.S. food manufacturers, in consultation with Post, wrote to the Hong Kong government to seek clarification on whether calcium carbonate is allowed for use as a food coloring additive. In response, the Hong Kong Center for Food Safety (CFS) confirmed that this chemical is allowed for use as a coloring matter. The CFS' welcomed decision on the allowable use of this chemical was recently posted on the government's website.

Hong Kong’s regulation on coloring chemicals is based on a positive list and calcium carbonate is not explicitly listed as a permitted chemical. Hence, representatives for U.S. food manufacturers, in consultation with Post, wrote to the Hong Kong Center for Food Safety for clarification. To the relief of the industry, the CFC has ruled that calcium carbonate is allowed for use as a coloring additive in foods.

Following the banning of titanium dioxide in the EU since August 2022, certain food manufacturers have moved to using calcium carbonate as a food coloring alternative. Hence, the Hong Kong government’s recent clarification is welcomed news as it will facilitate trade in consumer-ready foods. In 2021, Hong Kong was the seventh largest export destination for U.S. consumer-ready food products. During the first three quarters of 2022, U.S. sales totaled \$874 million.

Below is the explanation provided by the CFS extracted from the [Q&A](#) pertaining to Hong Kong’s [Coloring Matter in Food Regulations](#).

Can calcium carbonate be used as a food additive including colouring matter in food?

The Joint FAO/WHO Expert Committee on Food Additives (JECFA) has evaluated the safety of calcium carbonate. According to the Codex General Standard for Food Additives (GSFA), calcium carbonate is a permitted food additive with multiple technological functions such as acidity regulator, anticaking agent, firming agent, flour treatment agent, stabilizer and colour. In places like the European Union, the United States and Canada, calcium carbonate is also a permitted food colouring matter.

In Hong Kong, calcium carbonate can be used in food in general. Besides, the First Schedule to the Colouring Matter in Food Regulations (Cap. 132H) specifies colouring matter permitted for food use. Calcium carbonate, being natural to some leafy green vegetables, is also considered a permitted colouring matter under Cap. 132H.

The Food and Drugs (Composition and Labelling) Regulations (Cap. 132W) also specifies the maximum levels of calcium carbonate in certain milk products. As a stabilizer in cream, the maximum level of calcium carbonate is “limited by good manufacturing practice#” while as an acidity regulator in condensed milk, the maximum level of calcium carbonate is as follows:

Maximum level of calcium carbonate in sweetened condensed or evaporated milk; sweetened condensed skimmed or separated milk; and unsweetened condensed or evaporated milk

Acidity Regulators	
Additive	Maximum Level
Calcium carbonates	2 grams per kilogram singly or 3 grams per kilogram in

Sodium phosphates	combination, expressed as anhydrous substances
Potassium phosphates	
Calcium phosphates	
Diphosphates	
Triphosphates	
Polyphosphates	
Sodium carbonates	
Potassium carbonates	

#Good manufacturing practice includes a manufacturing practice which complies with the following requirements—

- (a) the quantity of the additive added to food is limited to the lowest possible level necessary to accomplish its desired effect;
- (b) the quantity of the additive that becomes a component of food as a result of its use in the manufacturing, processing or packaging of a food and which is not intended to accomplish any physical, or other technical effect in the food itself, is reduced to the extent reasonably possible; and
- (c) the additive is prepared and handled in the same way as a food ingredient.

Attachments:

No Attachments.