

28 Apr, 2003

Dear Joan,

Further to our telephone conversation, the followings are our views on the proposed food labelling legislation:

- (1) In principles, the proposed legislation is in line with the global trend in other countries.
- (2) The proposed transition period of 5 to 10 years from voluntary to mandatory basis is reasonable, providing there is clear definition on the requirements and enough support from ingredient suppliers.
- (3) Most prepacked food items are imported from China and elsewhere in the world. As HK's volume is relatively small, it would be very expensive to have special labeled packaging or individually stickered.
- (4) If only core nutrients (macronutrients) are listed, how about the micronutrients like minerals and vitamins and even dietary fiber content?
- (5) Some concerns about the "not so clear" differentiation between nutrient function claims and health claims, leading to implementation of legislation control.
- (6) A voluntary labeling system for GM food is welcome however the cost of analysis and availability of information is a concern.
- (7) There is also a problem on Negative Labeling i.e. to declare "No GM or Non-GM" ingredients being used on packaging. The less responsible company will unfairly compete over the more responsible company on negative declaration.

Pls feel free to call me at 9097-8832 for further discussions.

Hong Kong Food Science & Technology Association

Becky Cheung
Chairlady