

**Panel on Food Safety and Environmental Hygiene**

**Summary of submissions on labelling of genetically modified food received by the Panel  
(as at 17 June 2003)**

<b>Organisation [LC Paper No.]</b>	<b>Views/Suggestions</b>
1. The Hong Kong Food Council [CB(2)1565/02-03(01)]	<ul style="list-style-type: none"><li>- <u>supports</u> implementing voluntary genetically modified (GM) food labelling</li><li>- <u>suggests</u> that mandatory GM labelling should not be introduced until Codex Alimentarius Commission has established an internationally agreed standard for GM food labelling</li><li>- <u>considers</u> that the requirement to label all GM food is not easy to enforce because of limitation of detection methods for GM foods and not all GM food products are readily identifiable by end-product analysis. Moreover, the laboratory capabilities in Hong Kong are inadequate to provide the necessary testing for GM foods</li><li>- approaches in GM food labelling differ from place to place. e.g. Japan, Korea and Taiwan have adopted labelling of designated food items that contain GM ingredients as major components. Canada and USA only require the labelling of GM food that is not substantially equivalent to its conventional counterpart and the trade may label other GM food on a voluntary basis. Moreover, Canada and USA are still drafting guidelines for the voluntary labelling of GM food. In fact, a consensus has yet to be reached in the international community on the labelling approach of GM foods and not all countries have implemented mandatory GM labelling</li></ul>

	<ul style="list-style-type: none"><li>- Hong Kong relies heavily on imported food. Should Hong Kong introduce labelling requirements which are more stringent than those imposed by some of her trading partners, this will not only generate increased costs to importers but also give rise to trade barriers</li><li>- <u>supports</u> that the Government should adopt a gradual approach in implementing food labelling systems</li></ul>
2. Hong Kong Retail Management Association [CB(2)1836/02-03(04)]	<ul style="list-style-type: none"><li>- <u>welcomes</u> the proposal of implementing voluntary GM food labelling and agrees that the trade should be encouraged to label voluntarily</li><li>- the lack of an international consensus on threshold level for GM food labelling is the main problem for implementing mandatory GM labelling. The lack of consensus affects all organisations, particularly small and medium sized enterprises, which are faced with the task of complying with multiple laws</li><li>- it is impractical and costly for Hong Kong to adopt a GM labelling approach which is different from its major trading partners. This will result in higher production costs and retail prices, and reduced choice for consumers as some products may disappear from Hong Kong market</li><li>- <u>suggests</u> granting blanket approval to products imported from markets which have demonstrated sufficient control over GM labelling</li><li>- <u>worries</u> that the proposed pre-market safety assessment will result in increased cost of regulation to the Food and Environmental Hygiene Department (FEHD) and entail a lengthy approval process</li></ul>

<p>3. World Wide Fund for Nature [CB(2)1836/02-03(07)]</p>	<ul style="list-style-type: none"><li>- <u>welcomes</u> the proposed introduction of a requirement of pre-market safety assessment for food containing GM ingredients. However, GM food suppliers and manufacturers should still label all the GM ingredients in their food products no matter whether the GM ingredients are on the list of approved GM ingredients or not</li><li>- <u>suggests</u> a grace period of 12 months be granted to those GM products already in the market</li><li>- <u>supports</u> the formulation by the Government of a set of guidelines on the labelling of GM foods</li><li>- <u>demands</u> the Government to implement mandatory labelling of GM food</li></ul>
<p>4. The Democratic Party [CB(2)1875/02-03(01)]</p>	<ul style="list-style-type: none"><li>- <u>demands</u> the Government to implement mandatory labelling of GM food to enable consumers to make informed choice</li><li>- <u>considers</u> that the Government has already wasted a lot of time in conducting the relevant studies and has lagged far behind in introducing regulation of GM foods compared with our neighbouring places. The Government should provide for mandatory labelling by introducing legislation and the approach should be "voluntary labelling to be followed by mandatory"</li><li>- <u>suggests</u> setting the threshold at 1% for GM labelling</li><li>- <u>suggests</u> that FEHD should conduct regular inspections of the prepackaged food items available in the market and publish any of them contain GM ingredients</li></ul>

<p>5. The Consumer Council [CB(2)1836/02-03(03)]</p>	<ul style="list-style-type: none"><li>- <u>supports</u> the introduction of a mandatory labelling system for GM food as soon as practicable. There is already a general consensus in the international community on the need for the labelling of GM food and consumers have the right to know whether the food items they pay for contain GM ingredients</li><li>- <u>points out</u> that voluntary labelling cannot prevent withholding of GM ingredient information or making false claims about the GM content</li><li>- <u>supports</u> the implementation of a mandatory pre-market safety assessment of GM food and <u>welcomes</u> the formulation of guidelines on GM labelling</li><li>- <u>suggests</u> that the use of negative labelling claims should be prohibited</li><li>- <u>points out</u> that in USA, safety assessment relies on claims advanced by biotech companies and the GM variety is regarded as safe if there is no scientific evidence to the contrary. Consumer organisations worldwide consider such an approach inappropriate and the Consumer Council considers that such an approach should not be followed by Hong Kong</li><li>- <u>proposes</u> for the introduction of traceability/product tracing technology and the requirement of proper documentation in the production of GM food</li><li>- <u>suggests</u> that local universities and research institutions should be encouraged to conduct studies on GM food safety to produce data and information directly applicable to the local population</li></ul>
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<p>6. Hong Kong Food Science &amp; Technology Association Limited [CB(2)1906/02-03(02)]</p>	<ul style="list-style-type: none"><li>- <u>supports</u> the implementation of a voluntary GM food labelling system</li><li>- <u>suggests</u> that mandatory GM food labelling should be introduced at least 5 years later</li><li>- Problems of implementing mandatory GM labelling include -<ul style="list-style-type: none"><li>a. the production cost will have to increase which will be passed onto customers</li><li>b. adequate time should be allowed for the trade to allow existing stocks of packaging to be finished before implementing new labelling requirements</li><li>c. there is a lack of information on the cost of GM testing and on negative labelling. Laboratories which provide GM testing services are also limited in Hong Kong</li><li>d. local retailers or manufacturers often buy ingredients from the Mainland through an exporter. It is difficult to trace for which farm or factory has produced the ingredients</li></ul></li></ul>
<p>7. Hong Kong DNA Chips Limited [CB(2)1836/02-03(05)]</p>	<ul style="list-style-type: none"><li>- <u>suggests</u> the adoption of a "Yes/No" principle for GM labelling while allowing an acceptable level of adventitious contamination</li><li>- highly sensitive DNA-based tests are available in Hong Kong for detecting the presence of GM ingredients at a level even lower than the threshold of 1% adopted by the European Union</li><li>- the global trend is towards providing more information to consumers about ingredients derived from GM sources</li></ul>

<p>8. Hong Kong Organic Farming Association [CB(2)1906/02-03(03)]</p>	<ul style="list-style-type: none"><li>- <u>supports</u> introducing a mandatory labelling system for GM food to protect consumers' right to know and enable them to make their choices taking religious, cultural or ethical issues into consideration</li><li>- without a mandatory labelling system for GM food, organic food producers may inadvertently use GM ingredients in their food production process and this problem has already posed a serious threat to organic farming</li><li>- since legislation on GM food labelling has already been introduced in our neighbouring places such as Japan, South Korea, Mainland China and Taiwan, Hong Kong will become a dumping ground for GM food not approved to be sold in other countries</li></ul>
<p>9. Green Women Current - Tuen Mun Yan Oi Tong Women's Development Centre [CB(2)1906/02-03(01)]</p>	<ul style="list-style-type: none"><li>- <u>supports</u> introducing a mandatory labelling system for GM food to protect consumers' right to know and enable them to make informed choices</li><li>- since the long-term effect of consumption of GM food on human health is still uncertain, consumers should not be used as guinea-pigs for testing the safety level of GM food</li></ul>
<p>10. Hong Kong Organic Resource Centre [CB(2)1891/02-03(01)]</p>	<ul style="list-style-type: none"><li>- <u>welcomes</u> the introduction of a requirement of pre-market safety assessment for food containing GM ingredients and the proposal of issuing a set of guidelines on the labelling of GM food by the Government. However, no conclusion on the health impact of GM food can be drawn even though the food passes the assessment</li><li>- <u>supports</u> introducing a comprehensive, stringent and mandatory labelling system for GM food as soon as possible</li></ul>

	<ul style="list-style-type: none"><li>- GM labelling will not incur extra testing cost to the trade since they anyway have to go through the proposed pre-market safety assessment. To meet GM labelling requirement, they simply have to set out in food labels the outcome of the safety assessment</li></ul>
11. Greenpeace [CB(2)1511/02-03(03) CB(2)1836/02-03(06)]	<ul style="list-style-type: none"><li>- <u>supports</u> introducing as soon as possible a stringent, mandatory labelling system for all food which is produced, processed, cultivated or grown by using genetic modifications</li><li>- <u>suggests</u> setting the threshold at 1% and a grace period of not more than 18 months should be allowed for the food trade before the relevant legislation taking effect</li><li>- the proposed pre-market safety assessment for food containing GM ingredients cannot address consumers' concern about the safety problem of GM food</li><li>- the implementation of mandatory GM food labelling will not have serious impact on people's livelihood as supported by the findings of the regulatory impact assessment (RIA) report, which points out that "for most manufacturers these costs were unlikely to be significant and if the costs could be diluted over a longer period of time (more than one year), then the actual impact on the company's revenues and profits might not be significant" and "it is unlikely that the costs incurred will be recoverable from retailers"</li><li>- the RIA report also points out that the financial implications to the food trade in implementing mandatory labelling only "ranges between HK\$16 million to HK\$91 million". Even the most costly option (HK\$91 million) is not substantial as the cost can be shared out by the different sectors of the food trade</li></ul>

	<ul style="list-style-type: none"><li>- mandatory GM food labelling has been implemented in about 39 places and it was not known any economies or food traders/manufacturers have been negatively impacted by the implementation of mandatory GM food labelling</li><li>- Greenpeace has surveyed 80 local food manufacturers and agents, of which 49 have confirmed in writing that they do not use GM ingredients and 3 have undertaken to avoid using GM ingredients. So GM labelling will not incur much extra costs to these food traders and it is only fair to them by requiring their counterparts using GM ingredients to label their products as containing GM ingredients</li><li>- Greenpeace has also written to local food manufacturers in January and September 2002 and many of them have responded positively to the introduction of mandatory GM labelling. Extracts from the responses are set out in the submission of Greenpeace [LC Paper No. CB(2)1836/02-03(06)]</li><li>- a position paper jointly signed by 27 community organisations, political parties and green groups is attached to the submission of Greenpeace</li></ul>
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