

香港供應商協會有限公司  
**Hong Kong Suppliers Association Co Ltd**

立法會 CB(2) 1089/03-04(01)號文件  
LC Paper No. CB(2) 1089/03-04(01)

**Re: Labelling Scheme on Nutrition Information**

Our Views:

We agree that a proper nutrition label would provide valuable information to the consumer and help the public to identify a balance and nutritious diet.

At present, only three countries, U.S.A., Australia and New Zealand have mandatory nutrition labelling requirement in placed. The Canadian Mandatory Nutrition Labelling Law is not yet enforced and will be enforced in 2005. Malaysia and Taiwan have mandatory nutrition labelling for specified food only. The rest of the world are either taking a voluntary approach or not have labelling requirement at all on nutrition fact declaration. It is important to note that there is no international standard on nutrition labelling and each country could have its own set of requirements. Hong Kong is a city with only a population of about 6.8 million with limited financial resource compared to the developed countries, limited regulatory capability and 90% of food imported. We query the wisdom of the Hong Kong Government in rushing to a labelling scheme when the rest of the world, **our sources of food**, knowing that nutrition label is an useful information for the consumer, are still having problems implementing a mandatory scheme. In addition, the labelling scheme proposed in the Consultation Documents is probably **the most** comprehensive amongst the developed countries. Hong Kong will become the most regulated place in the world in term of nutrition labelling.

90% of the Hong Kong packaged foods are imported. Our largest food supplier – Mainland China does not have a mandatory nutrition labelling scheme. Hong Kong is only a small market with many brands of packaged foods imported from all over the world. Some small food suppliers may not be able to provide us with the information needed for the label because their scale of production are small. Some large food suppliers may not be willing to modify their label to comply with the Hong Kong requirement due to the small size of the Hong Kong market. As a result, our choices of food will be reduced. We must keep in mind that Hong Kong is only a small market. In the case of nutrition labelling, the worst scenario and nightmare, however, would be some unethical food suppliers falsify the contents of the nutrition labels because they can't afford it.

We would like to remind the trade that the difference in a very simple best-before-date labelling requirement on food products between China and Hong Kong already created a lot of problems to the food suppliers.

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A nutrition label alone will not achieve the objectives stated in the Consultation Document: 1. Facilitating healthy food choices. 2. Encouraging food manufacturers to apply sound nutrition principles. 3. Regulating misleading nutrition label and claims. The Government must allocate substantial investment in educating the public to understand the information on the label, educating the trade to comply with requirement and implement appropriate monitoring and policing policies to achieve the objectives set forth. There is no mention of such supporting activities in the Consultation Documents.

Without proper support from the Government, the effort by the trade in complying with the nutrition label would be wasted.

Our suggestions:

1. The Government should invite representatives from the supplier and retail trades of packaged food to join the Panel on Labelling Scheme of Nutrition Information. Only we, the trade, would know the difficulties we may encounter and share with the Panel experience from our international market.
2. Hong Kong mandatory nutrition labelling requirement should **ONLY** apply to **specified food products** that are basic to our diet. The Government shall consult with the trade and the public to form the list of specified food products.
3. Hong Kong is a small market and import most of our food. The Hong Kong Government should accept the nutrition labels of the source countries. The Hong Kong Government should evaluate the labelling and nutrition claims standard of source countries with nutrition labelling law in placed. If their labelling standards are deemed acceptable, Hong Kong should officially accept such standards and require packaged food products imported from such source countries to meet their domestic requirements.
4. The Hong Kong government should conduct a regulatory impact assessment and include the input from the supply and retail trades of packaged food before deciding on the labelling scheme. The proposed energy plus nine core nutrients requirement on the label is not acceptable. The Hong Kong Government should consider the Codex minimum as mandatory for the specified food products. Mainland China is our main food sources and trading with the Mainland is of utmost importance to Hong Kong. We strongly recommend the Hong Kong Government to co-ordinate with The Mainland China on their development on this issue and arrive at a unified standard.
5. The Government must detail the approval, monitoring, controlling and policing processes of the labelling scheme together with the proposed legislation. The fund required to implement such processes must be included in the proposal of labelling scheme.

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6. The Government must educate the public on nutrition value so the public could benefit from the nutrition label. The budget allocated to this effort must be included in the proposal of labelling scheme.
7. There should not be a 3 years time limit for implementation. Hong Kong just started discussing about the issue in 2003. Other countries taking years and years of research and study still have not arrived at a mandatory system. The Hong Kong Government must thoroughly study the issue and its impact before setting any deadline on the matter.

If you would like to discuss with us on this issue, please email to [contactus@hksuppliers.com](mailto:contactus@hksuppliers.com) or call Mr. Albert Tang at 25433110.

Thank you for your attention.

The Hong Kong Suppliers Association