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香港中華廠商聯合會  
The Chinese Manufacturers' Association of Hong Kong  
(一九三四年成立 Established in 1934)

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Dear Mr Li,  
**RE: Nutrition Labelling**

We submit herewith a position paper on Hong Kong's current approach to food laws vs a more desirable one which is self explanatory. Whilst it dealt with the larger issue of a general approach to all food laws and regulations, it is also applicable to the current debate on nutrition labelling and we repeat our recommendations herein.

- a) that for all imported food, originating countries laws be complied with, and
- b) that Codex recommendations be adopted on a voluntary basis, becoming mandatory only when the USA, Europe and China all become mandatory.

Specific to nutrition labelling, and generally in line with our recommendations above, we recommend that we follow substantially the current practice in Europe :-

“.....that nutrition labelling should be voluntary, unless a nutrition claim is made. In addition to the four parameters (energy, protein, carbohydrate, fat) required by the Codex, content levels of sugars, saturated fat, dietary fibre and sodium should be shown if any of these nutrients is involved in a claim. Other specified macronutrients as well as certain vitamins and minerals if present in significant amounts, may be declared.....”

We submit that this practice should be acceptable to the community at large on the grounds that what is acceptable to a European Union community of 380 Million people must surely be acceptable to Hong Kong.

Yours sincerely,  
  
Francis Lau  
Secretary-General

cc. Hon Mrs Sophie LEUNG LAU Yau-fun, SBS, JP

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### Current Approach vs Desirable Approach

Hong Kong's current approach to food regulation is disruptive and divisive costly, ineffective and restrictive.

- Disruptive & divisive** -because it pitches consumers against suppliers creating conflict where there should be none. This is most undesirable because more than ever we need more unity not more conflicts.
- Costly** -because endly debates and researches are done to justify demands from both sides; grounds Codex under UN have already gone over at costs which our government and society can ill afford.
- Ineffective** -because regardless of what we decide no one is going to pay much attention to the demands of a 6.8M populations on food.
- Expensive & restrictive**-the end result is that after much disruption, costly debates and research we produce a local law that is largely going to be ignored by the international food producing community; the worst case results is that after all the work we actually restrict choice and create an environment for ourselves which is both expensive and less choice.

Take the example of GMO :-

USA say less law ; Europe say more law; HK's consumer lobby choice :- follow Europe

Then in the current debate over nutrition labelling:-

USA say more law; Europe say less law; HK's consumer lobby choice :- follow USA

So if we follow our current approach, we'll end up with the strictest food law in the world; unfortunately only half the worlds' producers are going to entertain our demands, it will be expensive and our ability to choose is in fact worst off.



There is an easier and more desirable approach which happens also to be simple :-

Codex under UN is in fact a compromise mechanisms of international proportion. The issues we care about, health and safety, consumers' right to know, the science behind an issue, availability, trade and geo-political considerations have all been thoroughly studied and debated at the highest and international levels. The depth and breadth of their debate and research is well beyond what we can afford locally and is out of our local knowledge and other resources bases. When there is no UN consensus there is always a very good reason behind it, and we should not and need not spend a lot of our limited resources to arrive at the same conclusion. This also applies to their recommendations.

The simple and desirable approach will be to :-

- a) require that for all imported food, originating countries laws be complied with, and if we can persuade the government and the community to adopt this approach we can end all the work and debate and have legislations that are logical and cost effective to all.
- b) adopt Codex recommendations on a voluntary basis becoming mandatory only when USA, Europe and China all become mandatory.