

Position Paper on Labelling Scheme on Nutrition Information (RE: Revised Proposal from FEHD 15 April 2005)

This position paper holds the beliefs and views of the Hong Kong Nutrition Association Limited. Views from our members were collected between 15th April 2005 to 8th May 2005, and this documented was compiled by the executive committee (year 2004-2005).

Here are specific comments and suggestions:

- 1) Overall revised proposal
 - a) HKNA agrees to implement a mandatory nutrition labeling system for prepackaged food products, with a set of local Nutrient Reference Values (NRV) and a set of tolerance limits of the nutrient verification.
- 2) Timeframe and Structure of the Implementation
 - a) Phase I
 - i) HKNA agrees on the 2-Year grace period before the implementation of Phase I.
 - ii) HKNA agrees to include only foods with nutrient related claims in Phase I.
 - iii) HKNA agrees on the inclusion of **energy, protein, carbohydrate, total fat, saturated fat and sodium (1+5)** as the **6** mandatory nutritional components, as well as any nutrient stated in nutrient related claims for Phase I labeling.
 - b) Phase II
 - i) HKNA agrees on the 2-Year grace period before the implementation of Phase I.
 - ii) HKNA agrees to include all foods in Phase II.
 - iii) HKNA agrees on the inclusion of the 4 other nutrients, namely **cholesterol, sugars, dietary fibre and calcium**, in addition to **energy, protein, carbohydrate, total fat, saturated fat and sodium (1+9)** as the **10** mandatory nutritional components for Phase II labeling.
- 3) Nutrient Content Expression
 - a) The HKNA suggests to have nutrient contents expressed in both 100 g and per serving of normal consumption.
- 4) Setting up local Nutrient Reference Values

- a) HKNA agrees on setting up a local NRV system with discussion with the trade and professional sector.
 - i) When developing the local NRVs, the HKNA suggests to get that the government shall sought views from different nutritional professionals including professional nutrition societies and universities.
 - ii) The HKNA supports using the dietary reference intake from China as a reference, in view of the fact that
 - (1) Chinese remains as the major population in Hong Kong;
 - (2) Most imported foods to Hong Kong are imported to China as well, and having a different set of NRV may create obstacles for these potential food importers.
 - (3) While using the DRI from China, please keep in mind some of the nutrients might needed to be revised based on the local data.

- 5) Development of guidelines for nutrient testing
 - a) Accuracy of Nutrition Information
 - i) The HKNA understands that it is not economically feasible for many food manufacturers to analyze their food product with chemical analysis, and the HKNA agrees that analysis done with reputable nutrient database would be acceptable. However, the HKNA strongly feel that a **monitoring system** must be installed in order to ensure the accuracy of the nutritional information, in order to:
 - (1) gain control from the side of the FEHD;
 - (2) ease the spot checking process performed by FEHD
 - ii) In addition, the HKNA suggests that the government to make it mandatory for food manufacturers to report on the following:
 - (1) method of the food analysis -- food database nutritional analysis, versus chemical analysis;
 - (2) source of service of the food analysis;
 - iii) And the government to keep a searchable database of the above items for the interested publics.

- 6) Public Education
 - a) As indicated in the previous consultation paper, the amount of information provided needs to be in a balance with the general level of knowledge of the public on nutrition information. The HKNA believes that various nutrition education shall be provided to: 1) the general public, 2) health professionals, and 3) food manufacturers in order to enhance the effectiveness of a nutritional labeling system.
 - b) Primary Education



(1) Education related to understanding the nutrition label shall be the primary education scheme, which should include understanding all nutritional components (1+9) in the nutrition label, as well as technique on reading nutrition label.

c) Other Education

(1) Education related how to use the food label as a health tool for helping with specific therapeutic diets is needed. This shall be provided to specific patient group and general public.

(2) Education to food manufacturer is encouraged the different therapeutic nutrients to provide an incentive for creating healthier food products.

7) Foods for special dietary uses

a) HKNA recognizes the importance for all foods with claims or statements related to “any” disease or health condition, for example, “suitable for diabetes” or “help fighting heart diseases” to have all 10 nutrient components implemented in phase I, in order to truly inform customers about its nutritional contents and avoid misleading information. Please see table 1 for primary therapeutic nutrients for various diseases and health conditions.

	Energy	Protein	Carbo-hydrate	Total Fat	Sat. Fat	Sodium	Chole-sterol	Sugar	Dietary fibre	Calcium
Diabetes Mellitus	•	•	•	•	•	•	•	•	•	
Cardiovascular Diseases	•	•	•	•	•	•	•	•	•	
Hypertension	•			•	•	•	•		•	•
Renal Diseases	•	•	•	•	•	•			•	•
Liver Disease	•	•	•	•	•	•				
Weight Management	•	•	•	•	•			•	•	
Osteoporosis	•	•	•			•				•
Protein-energy Malnutrition	•	•	•	•	•					
Cancer / Neoplasm	•	•	•	•	•			•	•	

Thank you very much for your kind attention. Shall there be more views sought from the HKNA, please contact us at info@hkna.org.hk.



Feed Backs from Members

Ms. Daphne Wu

- > Does the HK government suppose to list per 100g only?
- > It may not be easy for the general public to
- > understand the portion. Including per serving would be
- > better.
- >
- > Daphne

Ms. Janet Lok

- > I have the following comments:
- > 1) The implementation period takes too long:- enactment + 2 years grace
- > period + 2 years Phase I etc. despite a lot of comment requesting speedier
- > approach: 29% from public, 33 % from patient groups 23 % from
- > professionals, 50% Legco members

- > 2) Phase I applicable to prepacked products with nutrition claims only:
- > Will existing products withdraw their nutrition claims then we'll end up
- > with lesser products with nutrition labelling.
- > Manufacturer might find other ways of promoting their products instead of
- > on their packaging e.g. via TV or other media, on shelves & racks , via
- > flyers etc.

- > 3)The interest of the trade has been well looked after e.g. smaller
- > compliance cost , fewer product loss etc. What about the patients' (or
- > consumers') need/right to know? The professionals will have to wait longer
- > before we can provide more information to our clients.

- > 4)Will there be Phase III & so on :-
- > What:- :i.e. nutrients other than energy & the 9 nutrients mandatory in
- > Phase II period e.g. potassium, monounsaturates, transfat,
- > vitamins C, D, K, folate, B12, Iron etc.
- > When:- implementation plan.
- > Coverage:- infant food & special dietary products

- > 5) Did not spell out the exemption criteria for SME

- > 6) Need to spell out education strategy & monitoring strategy
- >
- > Janet Lok