

立法會

Legislative Council

Panel on Food Safety and Environmental Hygiene

Views and suggestions expressed/made by deputations
on the proposed labelling scheme on food nutrition at the meeting on 10 May 2005

Organisations (LC Paper No. of submission if applicable)	Views and/ or suggestions
I Implementation timetable	
Consumer Council [CB(2)1507/04-05(01)]	It supported early implementation of nutrition labelling, and should not be later than 2008 (Phase I) and 2010 (Phase II) respectively as proposed by the Administration. The two-year grace period for implementing each Phase should be sufficient for the trade to make necessary adjustments to meet the labelling requirements.
Hong Kong Retail Management Association [CB(2) 1513/04-05(01)]	It considered that Hong Kong should not move ahead of the European Union and the Mainland in implementing labelling requirements where nutrition labelling was not mandatory. It requested that the implementation plan should be developed jointly with the retail and wholesale trades. Issues relating to the format, location and wording to be used on the labels, testing protocols, provision of defence clause to retailers, ongoing measurement of positive and negative consequences, future labelling requirement changes, etc. should be resolved before the proposed scheme was implemented.

<p>Federation of Hong Kong Industries [CB(2) 1507/04-05(02)]</p>	<p>It considered that the shortest possible time for implementing the proposal should be five years (i.e. a two-year grace period before the implementation of Phase I, and Phase II would be implemented three years after the implementation of Phase I).</p>
<p>Hong Kong Suppliers Association Limited [CB(2) 1465/04-05(04)]</p>	<p>Phase II should be implemented at least five years after the implementation of Phase I.</p>
<p>The Hong Kong Food Council Limited [CB(2) 1507/04-05(03)]</p>	<p>The Administration should review whether Phase II should be implemented one year after the implementation of Phase I. Nutrition labelling for all prepackaged foods should be implemented on a voluntary basis.</p>
<p>Hong Kong Federation of Restaurants and Related Trades [CB(2) 1456/04-05(02)]</p>	<p>One-step approach should be adopted. A longer grace period should be allowed for the industry to make necessary preparation.</p>
<p>Hong Kong and Kowloon Sauce and Preserved Fruits Amalgamated Employers Association</p>	<p>It agreed that nutrition labelling would have positive impact on the food industry in the long term, but voluntary nutrition labelling should be implemented.</p> <p>The implementation date for Phase I and Phase II should not be applied across the board for all food products, as some niche and low volume products would take longer time to clear their existing stock.</p>
<p>Hong Kong Medical Association</p>	<p>It supported the proposed labelling scheme which would help consumers make informed choices on food. While it supported the introduction of the labelling requirements in phases to allow time for the industry to make adjustments to the proposed requirements, the proposed grace period for implementing Phase I and Phase II was longer than necessary. The Administration should expedite the implementation timetable.</p>

<p>Hong Kong Doctors Union [CB(2) 1456/04-05(03)]</p>	<p>It supported the proposal as it would help people to better understand the nutritional value of products with nutrition claims.</p> <p>It considered that the grace period for full implementation of mandatory labelling should be shortened to three years.</p>
<p>Association of Hong Kong Nursing Staff [CB(2) 1456/04-05(04)]</p>	<p>It strongly opposed implementing the proposal in phases, as nutrition labelling was an important tool of disease prevention and health promotion. It strongly urged that a one-step approach for mandating labelling of energy plus nine core nutrients for all prepacked foods, with a grace period of three years, should be implemented as soon as possible.</p>
<p>Care For Your Heart [CB(2) 1456/04-05(05)]</p>	<p>It supported the implementation of nutrition labelling requirements which facilitated consumers to make healthier choices.</p> <p>Since the consultation of the proposal had been launched in November 2003, the food industry already had sufficient preparatory time, and it was not necessary to extend the proposed grace period. It urged for implementing nutrition labelling as soon as possible.</p>
<p>The Hong Kong Dietitians Association Limited [CB(2)1517/04-05(01)]</p>	<p>It supported the implementation timetable on the condition that Phase I would include labelling of energy plus nine core nutrients for prepackaged foods with nutrient-related claims. It also supported that Phase II would be implemented two years after the implementation of Phase I.</p>
<p>The Hong Kong Nutrition Association Limited [CB(2) 1507/04-05(04)]</p>	<p>It agreed to the proposed implementation timetable for Phase I and Phase II.</p>
<p>Hong Kong Academy of Medicines [CB(2)1456/04-05(06)] (written submission only)</p>	<p>It supported to proposal in general, and considered that the timing for implementation should be sped up.</p>

<p>The Confectioners and Bakers Association of Hong Kong and Kowloon [CB(2)1456/04-05(07)] <i>(written submission only)</i></p>	<p>It supported the implementation of Phase I but strongly opposed the implementation of Phase II. There was no need for mandatory nutrition labelling as most of the imported food products already had nutrient information. Food products without nutrient information would be eliminated if consumers did not buy such products.</p>
<p>Hong Kong Association of Study on Obesity [CB(2)1465/04-05(05)] <i>(written submission only)</i></p>	<p>It supported staged implementation of labelling requirements for prepackaged food products, which should be enforced through legislative amendment to the regulations made under Cap. 132.</p>
<p>Hong Kong College of Community Medicine [CB(2) 1507/04-05(05)] <i>(written submission only)</i></p>	<p>It strongly supported the introduction of a mandatory nutrition labelling scheme as early as practically feasible. The scheme should cover energy plus nine core nutrients.</p>
<p>II Labelling requirements</p>	
<p>Consumer Council [CB(2)1507/04-05(01)]</p>	<p>It strongly supported the labelling requirements for prepackaged food with nutrient-related claims in Phase I.</p> <p>It supported standardisation of format of nutrition labels for easy reference by consumers.</p> <p>To facilitate compliance, it suggested that the Administration should discuss with the food industry types of food products to be exempted from labelling requirements.</p>
<p>Hong Kong Retail Management Association [CB(2) 1513/04-05(01)]</p>	<p>It supported a labelling guideline that would help consumers make informed decisions about the food they purchased. However, the proposed labelling requirements were different from overseas requirements, and were too stringent. It considered that adaptation of the source countries' labelling requirements could equally serve the purpose.</p>

<p>Federation of Hong Kong Industries [CB(2) 1507/04-05(02)]</p>	<p>The labelling requirements should synchronise with the requirements of Hong Kong's major trading partners, notably the Mainland. Moreover, the source countries' labelling requirements should be acceptable.</p> <p>The Codex Guidelines on nutrition labelling (i.e. energy plus carbohydrate, protein and fat) should be adopted. The declaration of the amount of any other nutrients should be required only when a nutrient-related claim was made.</p> <p>It suggested that no separate nutrient testing should be carried out for the same product which were sold under different packages.</p>
<p>Hong Kong Suppliers Association Limited [CB(2) 1465/04-05(04)]</p>	<p>The labelling requirements in Hong Kong would only be second to US and Canada after Phase II was implemented. As over 90% of foods were imported, the labelling requirements were too stringent.</p>
<p>The Hong Kong Food Council Limited [CB(2) 1507/04-05(03)]</p>	<p>For food products imported from countries which had put in place labelling requirements, they should not be required to be re-labelled.</p>
<p>Hong Kong Food Science and Technology Association Limited</p>	<p>For food products imported from countries which had put in place labelling requirements, they should not be required to be re-labelled.</p> <p>The labelling requirements should synchronise with that in the Mainland.</p>
<p>Hong Kong Federation of Restaurants and Related Trades [CB(2) 1456/04-05(02)]</p>	<p>The proposal was too stringent, as most overseas countries required labelling of energy plus five to seven core nutrients. It suggested that the labelling requirements should cover energy plus five core nutrients. The Administration could encourage food manufacturers or importers to add other nutrient information to the food products. Moreover, food products from those countries which had put in place labelling requirements should be exempted.</p>

<p>Hong Kong and Kowloon Sauce and Preserved Fruits Amalgamated Employers Association</p>	<p>Labelling requirements should vary according to the nutrient values of food products. Mathematical calculation of nutrient information in addition to laboratory testing should be acceptable for nutrition labelling.</p>
<p>Hong Kong Medical Association</p>	<p>Standardisation of nutrient labelling prevented confusion and made it easier for consumers to make comparison. Potassium should be included as one of the core nutrients to be labelled.</p>
<p>Hong Kong Doctors Union [CB(2) 1456/04-05(03)]</p>	<p>It suggested adding potassium content to the core nutrients to be listed for labelling. Any nutrient-related claims must be supported with scientifically accepted evidence.</p>
<p>The Hong Kong Dietitians Association Limited [CB(2)1517/04-05(01)]</p>	<p>It suggested that both Phase I and Phase II should require labelling of energy plus nine nutrients. The food industry should be encouraged to include additional nutrients such as potassium, soluble fiber, monounsaturated fat, trans fatty acids as optional label items.</p>
<p>The Hong Kong Nutrition Association Limited [CB(2) 1507/04-05(04)]</p>	<p>It expressed agreement with the labelling requirements in Phase I and Phase II. The Association suggested that nutrient contents be expressed in both 100g and per serving of normal consumption.</p>
<p>Hong Kong Academy of Medicines [CB(2)1456/04-05(06)] <i>(written submission only)</i></p>	<p>It strongly supported the proposal of making it mandatory to declare the amount of any nutrient for which a claim was made. The manufacturers must have solid scientific base on the nutrient claim.</p> <p>The format of labelling should be standardised, clear and easy to understand. Nutrients should be expressed in absolute amount per 100g or 100 ml, per serving, and in terms of the percentage of Nutrient Reference Values per serving.</p> <p>Food iodine content should be added to the list of labelled items.</p>

III Impact of the proposed scheme	
Hong Kong Retail Management Association [CB(2) 1513/04-05(01)]	The proposal would have a significant impact on Hong Kong in terms of jobs, price increase and the availability of foreign goods.
Federation of Hong Kong Industries [CB(2) 1507/04-05(02)]	<p>The proposed scheme would increase the costs of food products which would eventually transfer to consumers. Phase II requirements were only less stringent than that in US and Canada. As food products imported from US and Canada represented about 15% to 18% of imported prepackaged food products in Hong Kong, nearly all the imported prepackaged food products would need re-labelling and repackaging.</p> <p>As Hong Kong was a small market, overseas manufacturers would be unwilling to re-package their foods and give up the Hong Kong market. This would also reduce food choices for local consumers.</p>
Hong Kong Suppliers Association Limited [CB(2) 1465/04-05(04)]	It expressed concern about the estimated closure of 191 small and medium-sized enterprises (SMEs) according to the Regulatory Impact Assessment (RIA). It also advised that the nutrient laboratory testing costs would amount to \$7,000 for one product.
The Hong Kong Food Council Limited [CB(2) 1507/04-05(03)]	The extent of closure of SMEs was underestimated in RIA. To minimise the costs to SMEs, the Administration should accept the laboratory test results of overseas laboratories.
Hong Kong Food Science and Technology Association Limited	It supported in principle the labelling scheme. However, it expressed concern about the impact on the industry which could lead to closure of SMEs, especially food products trading companies.
Hong Kong Federation of Restaurants and Related Trades [CB(2) 1456/04-05(02)]	The proposal would incur additional testing and re-packaging costs to the trade. The costs might eventually be transferred to consumers. It was estimated that the implementation of Phase II would incur additional costs of \$150 million on the trade. Hence, the total number of

	<p>SMEs to be closed down would exceed 191. Some SMEs might need to cut staff costs so as to meet the increased costs.</p> <p>The local consumers would have fewer food choices as some products might disappear from Hong Kong market.</p>
<p>Hong Kong and Kowloon Sauce and Preserved Fruits Amalgamated Employers Association</p>	<p>The proposal might result in closure of SMEs, hence unemployment problems. It requested the Government to provide assistance to SMEs.</p>
<p>The Confectioners and Bakers Association of Hong Kong and Kowloon [CB(2)1456/04-05(07)] (written submission only)</p>	<p>SMEs expressed concern about the expensive nutrient testing costs. The Association urged the Administration to provide guidelines on the testing costs and consider providing financial assistance to the industry in this respect.</p>
<p>IV Laboratory facilities</p>	
<p>Federation of Hong Kong Industries [CB(2) 1507/04-05(02)]</p>	<p>It worried that the existing laboratory facilities were unable to cope with the upsurge demand for nutrient testing. The Administration should devise a set of standardised testing method and make known to the food industry the testing standards. It suggested that a deviation of 20% from the standards should be allowed.</p>
<p>V Public education</p>	
<p>Consumer Council, Hong Kong Food Science and Technology Association Limited, Hong Kong and Kowloon Sauce and Amalgamated Employers Association, Care For Your Heart, The Hong Kong Dietitians Association Limited and The Hong Kong Nutrition Association Limited were of the views that Government should enhance public education on nutrition information.</p>	

VI Other views	
Hong Kong Retail Management Association [CB(2) 1513/04-05(01)]	As food consumption from restaurants and non-packaged food represented 75% of food consumption, Government should educate the public about changes in diet that would improve health. Nutrition information on food packaging would have a relatively small impact on improving public health.
Hong Kong Suppliers Association Limited [CB(2) 1465/04-05(04)]	A control and verification system should be put in place to monitor if the benefit claimed would realise in 20 years after implementation of the scheme. Prepackaged foods only accounted for 25% of food consumed locally. It questioned what course of actions would the Administration take regarding nutrient information of the remaining 75%.
The Hong Kong Food Council Limited [CB(2) 1507/04-05(03)]	The Administration should consult the food industry its overall plan on food-related regulations.
Hong Kong Food Science and Technology Association Limited	It was concerned that traditional Chinese food products would disappear from the market, as it was not cost effective to undergo nutrient testing and labelling for these products. The Administration should take into account local conditions in making reference to overseas experience.
Hong Kong Federation of Restaurants and Related Trades [CB(2) 1456/04-05(02)]	The direct relationship between nutrition information and public health was yet to be established.

<p>The Hong Kong Nutrition Association Limited [CB(2) 1507/04-05(04)]</p>	<p>The Association suggested that when setting up a local Nutrient Reference Value, the Administration should seek views from different nutritional professionals and use the dietary reference intake from the Mainland. The Administration should also ensure the accuracy of nutrition information by putting in place a monitoring system and requiring food manufacturers to report on the method of food analysis.</p>
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(* Written submission was received from Vitasoy International Holdings Limited [LC Paper No. CB(2) 1492/04-05(01)], which requested that its submission should not be made public.)

Council Business Division 2
Legislative Council Secretariat
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