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**Submission to Legislative Council Subcommittee on Food and Drugs  
(Composition and Labelling) on  
(Amendment: Requirements for Nutrition Labelling and Nutrition Claim) Regulation 2008**

Hong Kong Doctors Union fully supports the spirit of the captioned amendment regulation so that the public can be fully aware of the implications of consuming these products and take necessary precautions to avoid unwanted side effects if taken. Proper labelling prevents raising false hopes of cures, improvements or prevention of diseases by taking the products, which may not be as “nutritional” as claimed.

However, in the course of providing our citizens with nutrient information to reduce harmful factors for non-communicable diseases and to allow dietary management of non-communicable disease, the amendment regulation should take into consideration the developments of food label requirements overseas since Hong Kong imports most of its products abroad.

Since this is the first time that Hong Kong adopts a stringent food labelling scheme, we do believe that there would be future revisions to the requirements to meet scientific advances in the course of time. On writing up this submission, we have been approached by some parties of the food industry elaborating their concerns which make us think there are grounds for improvement in the amendment.

First, we see no superiority in stating the amount of core nutrients and claimed nutrients in absolute number to the relative amount expression. Regarding the absolute value of core nutrients and nutrients associated with the claims when products carry claim, we believe even doctors may not remember or interpret the daily requirements, let alone the general public. Labelling the percentage of nutrients – core or claimed - as percentage of recognized international food/health authority (e.g. Codex) or national food/health authorities (e.g. USFDA, CFIA or FSANZ) in Nutritional Reference Value per 100gm/mls or per servings is more useful and practical and is sufficient for consumers to make an informed choice. We believe the public will benefit more if we accept that for non-core nutrient claims to allow either relative amount expression or the absolute value of nutrients to back up their claims. We believe our proposal also applies equally to food products having sales volume less than 30,000 per year since their existing claims already comply with the most stringent overseas laws and are fully backed up by the detailed nutritional panel on the package. To ensure the public reliant on these products for medical and health reasons to have adequate supply, exemption should be extended to them.

Second, statement indicating the presence/absence of a particular nutrient in the label would not give the false impression to the doctors or the public that particular nutrient is superior. In fact, it would prove to be much well informative to us to have easily apprehended factual information of that particular nutrient without emphasizing on its high/low content. We do believe that wordings without claims should be flexibly treated and allowed.