



Hon Bernard Chan, Chairman of the Subcommittee,
Food and Drug (Composition and Labelling)
(Amendment: Requirements for Nutrition
Labelling and Nutrition Claim) Regulation 2008,
Legislative Council

30th April, 2008

Dear Chairman,

RE: Food and Drug (Composition and Labelling) (Amendment: Requirements for Nutrition Labelling and Nutrition Claim) Regulation 2008

The Hong Kong Association for the Study of Obesity (HKASO) is a medical association consisting of multidisciplinary healthcare professionals and scientists with special concerns on obesity as well as the related morbidities and mortality in Hong Kong. We are writing in support of the Government's proposal on Food and Drug (Composition and Labelling) (Amendment: Requirements for Nutrition Labelling and Nutrition Claim) Regulation 2008 published in Gazette on April 3, 2008.

Obesity has grown to be a major public health problem in Hong Kong and causing a tremendous burden to our healthcare systems. According to the Hong Kong Population Health Survey 2003/2004 commissioned by the Department of Health (DH), it is estimated that 38.9% of the population aged ≥ 15 years are either overweight or obese. More alarmingly, there is also a rising trend of obesity among the primary school students from 16.4 % in 1997/1998 to 18.7% in 2004/2005, i.e. one in five school children are obese. Obesity-related diseases including diabetes mellitus, coronary heart diseases, cerebrovascular diseases and certain types of cancers are currently contributing to the leading causes of deaths in Hong Kong. Proper nutrition information including detailed nutrient contents and scientifically supported nutritional and functional claims on the food labels can facilitate the

healthcare professionals including doctors, nurses and dietitians to educate both the patients and the general consumers to make the suitable food choices for optimal health promotion as well as disease prevention and management. Therefore, we support the proposal on nutrition labeling schemes in the specific aspects as follows:

1. Mandatory nutritional labeling with core nutrients

We support the mandatory nutritional labeling of all prepackaged food products meeting the requirement for energy + seven core nutrients (1+7), namely protein, carbohydrates, total fat, saturated fat, trans fat, sodium and sugars, as well as any nutrient for which a claim is made. This essential information is strongly relevant to maintaining good health as well as preventing and treating common lifestyle related diseases, such as obesity, diabetes, cardiovascular diseases.

2. Balance of the public health interest, availability of niche products for special population groups and consumer choice

We welcome the inclusion of a small volume exemption scheme for food products (without health claims) with annual sales volume of 30,000 units or below as a measure to balance the public health interest, availability of niche products for special population groups and consumer choice. However, we are strongly against the view of allowing any products with health claim exempted to the requirement of nutrition claim (which includes nutrient content claim, nutrient comparative claim and nutrient function claim). We believe prepackaged products should just list out their factual nutrient analysis if they do not satisfy the requirement of nutrition claim. The general public should be educated to understand and interpret the nutritional information in order to make their own judgments. Once the nutritional knowledge of the general public advances and the demand for the variety in products increases, more quality food items will come to Hong Kong to fill up the gap. Therefore, we do believe the availability and choices of valuable prepackaged food items will not be jeopardized.

3. Resources and supports for patient and public health education

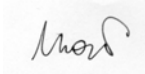
Resources and supports by the Government including funding and manpower are essential to facilitate multiple channels education by the healthcare professionals and the school teachers for the patients and the general public to understand and apply the nutrition information for disease prevention and management .

In conclusion, it is the position of the HKASO to support the Government to have a strong standpoint to advocate the Food and Drugs (Composition and Labelling)

Regulation 2008 with current Amendment and HKASO will be pleased to provide any related scientific information if required.

With very best wishes.

Yours faithfully,



Dr. Francis C.C. Chow, MBBS (HK), FRCP (Edin), FRCP (Lond), FHKCP, FHKAM (Med)
President, Hong Kong Association for the Study of Obesity
For and on behalf of the Hong Kong Association for the Study of Obesity

Corresponding Address:

C/o Department of Medicine & Therapeutics
Prince of Wales Hospital
Shatin, NT