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Subcommittee on Food and Drugs (Compostion and Labelling)

Requirements for Nutrition Labelling and Nutrition Claim – regulation 2008

Summary of presentation from Hong Kong Practising Dietitians Union:

1. to support no exemption to small volume foods with claims
2. to support “trans fat free” content of foods at 0.3g or less per 100g foods
3. Nutrient claims, such as rich in omega 3, rich in antioxidants, etc. , in the absence of clearly designated nutrient level, should not be allowed
4. Nutrient claims with wordings like: "contains" or "has" shall accompany with exact amount of the claimed nutrients

Contents:

1. no exemption to small volume foods with claims

The extent of mis-leading labeling in Hong Kong is extensive, because according to the commercial sector data, a possible 15000 food items may disappear on the shelves if proper nutrient claim is enforced. To protect public goods, it is important these widely available food items be **replaced by** true and honest labeling, so that the public, including patients with medical problems, would not fall prey to misleading and untruthful marketing, resulting financial loss (these products are promoted usually at a higher market price) and health loss (such as diabetic patients taking higher sugar foods than they perceived)

2. to support “trans fat free” content of foods at 0.3g or less per 100g foods

The consumption of trans fatty acids contributes to increased blood LDL-cholesterol ("bad" cholesterol) levels, and decrease HDL-cholesterol (“good”cholesterol, which are factors increasing the risk of coronary heart disease (CHD)). The provision of total amount of trans fatty acids in food label and the limit on *trans* fatty acids for content claims and for health claims is an important public health matter. A good lesson has learnt from Canada, after mandatory trans fat labeling come into effect in 2005, analyses carried out by Health Canada shown that most major food manufacturers and some fast food and restaurant establishments have successfully switched from using partially hydrogenated oils to non-hydrogenated oils (i.e. oils containing little or no trans fats) in the preparation of food products. A practice that is feasible. A liberalized and misleading nutrient claim label can tempt consumer into a more liberal intake of trans fat products. For example, when represented by serving size, a small

cookie (one serving) can be listed as trans fat free, since it contains only 0.5g trans fat in America. WHO recommendation on trans fat is less than 1 percent of the total calories. In a 2,000 calories diet, it translates to 20 calories, or 2 grams of trans fats. With misleading label claim, it affects the poor and lesser educated, who eat large amounts of cheap, commercially mass-produced foods like white bread, biscuits and pastries which contain high levels of trans fats. It is vital to understand that WHO recommendation of 1 percent trans fat is a COMPROMISE figure, since as far as modern scientific research has shown, the safe level of trans fat is ZERO.

3. Nutrient claims, such as rich in omega 3, rich in antioxidants, good source of lutein, etc , in the absence of clearly designated nutrient level and has not defined in the present scheme , should not be allowed.

Nutrient content claim should apply only to those nutrients or dietary substances that have an established daily value. Present food labeling proposal has not given guidelines on the level of nutrients, such as antioxidants, lutein, omega 3. Furthermore, the proposed nutrition claim regulation has not designated the level of nutrients in a food that could be classified as 'rich' or 'good source' of the foods. Misleading labeling confuse consumer because it characterizes a food having "healthy" levels. In the absence of proper designated standard, consumer will fall prey to marketing of food products for perceivable health benefits.

4. Nutrient claims with wordings like: "contains" or "has" shall accompany with an accurate quantitative statement/label of the claimed nutrients .

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