

**TO:** Subcommittee on Food and Drugs (Composition and Labelling)  
**(Amendment: Requirement for Nutrition Labelling and Nutrition Claim)**  
**Regulation 2008**

**RE:** Hong Kong Dietitian Local Registration Task Force (HKDLRTF)  
**Position Statement on Nutrition Labelling and Nutrition Claim**

The HKDLRTF hereby supports the followings:

1. There shall be no exemption to all small volume foods with health claims, for the following reasons:
  - a. Generates Confusion to the Publics –
    - i. The public will not be able to differentiate which products are in small volumes versus big volumes, and will assume that all products in the markets are governed by the current nutritional labeling scheme. Thus, inaccurate choices may be made due to misunderstanding.
  - b. “Healthy Products” should have objective proofs –
    - i. In view of public health interests, products bearing any kind of health / nutritional claims should provide objective / quantitative data to prove the specific claims.
  - c. Prevention of Health Frauds
    - i. If exemption is extended to small volume foods with health claims, food manufacturer may use health claims as a fraudulent tool to attract consumers.
2. There shall be no delay in the grace period for the above act, for the following reasons:
  - a. For the Publics Health Interest
    - i. In view of the rising trends of diet -related chronic diseases including but not limited to obesity, diabetes, cardiovascular diseases, colon cancer and breast cancer, there is an urgent need to enforce the nutritional labeling scheme, allowing consumers to make informed choices about their health.
  - b. Objective Tool for Health Education
    - i. A local nutritional label can act as an objective tool for fair comparison between different food products, which can make health education more effective. In the current practice, health professionals have found it difficult to fully interpret the nutrition contents of various food products and making recommendations, leading to a limitation of food choices for the public.

Presented by

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