

**Administration's Responses to Views of the Deputations
on the Nutrition Labelling Scheme**

Views of Deputations	Response of Administration
	<p><i>Hong Kong Dietitians Association, Hong Kong Nutrition Association, Hong Kong Medical Association, Care for Your Heart, Consumer Council, Professor Richard Fielding (School of Public Health, the University of Hong Kong), Hong Kong Practising Dietitians Union, Ms Chan Shu-ying, Dietitian Local Registration Task Force, Committee on Home-School Co-operation, Professor Georgia S Guldan (Department of Biochemistry, Food and Nutritional Sciences Programme, the Chinese University of Hong Kong, Mr Chiu Kam-lung, Good Food Watch (in relation to trans fat), Hong Kong College of Cardiology</i></p>
<p>Object to extending small volume exemption to food products with claims</p>	<ul style="list-style-type: none"> ● Hong Kong imports some 60% of prepackaged food. In introducing a nutrition labelling scheme, the Administration is mindful of the need to maintain food variety. ● With small volume exemption for food products with annual sales volume of 30 000 units or below, many ethnic food, organic food, or niche food products that are mostly imported would be exempted from the nutrition labelling requirements. We will be able to cater for the staging of food fair and trade promotion events held usually for market testing purpose. ● Furthermore, many local food manufacturers also produce food in small volume. The small volume exemption scheme will also help these local SMEs. ● One of the key objectives of the nutrition labelling scheme is to regulate false or misleading claims. It is the Government's intention that food with nutrition claims, including those with low sales volume, should properly label the nutrition information to justify their claims to consumers.

<i>Hong Kong Doctors Union; Hong Kong Suppliers Association; Ms Ellen Friedlander; Hong Kong Retail Management Association; Federation of Hong Kong Industries, Etak International Ltd, Supervalu, American Chamber of Commerce, Hong Kong General Chamber of Commerce</i>	
Consider that the small volume exemption should be extended to food with nutrition claims	<ul style="list-style-type: none"> ● It is international practice that food with claims should be labelled with its nutritional information. ● No country with a nutrition labeling scheme in place exempts food with claims (including the US, which implements a small volume exemption scheme). ● If food traders consider that the nutrition information should not be provided to consumers, and the products are sold in small volume, they may choose <u>not</u> to make the claim. ● If they choose to make a claim, then they will need to provide the nutrition information to fully inform consumers. ● Food with claims should not be taken to be healthy food (e.g. food with low-fat claim could have high sugar content). Truly healthy food would not hide nutritional information and responsible food traders should not avoid providing such information to consumers. ● Some products with nutritional claim may highlight or provide only the information of the claimed nutrient (e.g. low fat), but fail to provide information on other “bad” nutrients (e.g. high sugar content, high sodium content or high cholesterol content, which are bad for health). ● It will not be a loss to consumers if food that might be withdrawn include those that carry false claim. According to overseas experience and nutrition experts, those products will be replaced by healthier products.
<i>Civic Party</i>	

<p>Suggest the Government to consider reducing the maximum sales volume of the small volume exemption from 30 000 to 10 000 if other flexibilities are allowed</p>	<ul style="list-style-type: none"> ● The Administration has proposed to the LegCo Panel in December 2008 to implement a small volume exemption scheme for food products with an annual sales volume of 30 000 units or below. The cap was worked out in consultation with the trade.
<p><i>Hong Kong Doctors Union</i></p>	
<p>Nutrients only need to be listed in either exact amount or as a percentage of Nutrient Reference Value (NRV)</p>	<ul style="list-style-type: none"> ● The Administration has accepted the trade's suggestion to relax the requirement of labelling of non-core and non-claimed nutrients in a percentage of NRV. ● If a nutrition claim is made, then the exact amount of the nutrient (whether it is core or non core nutrient) must be labelled for consumers' reference. ● As the NRV of different countries vary, it will not provide consumers with a useful reference if only a percentage of NRV for the nutrient is labelled.
<p>The Government should allow the trade to make claim on Omega3</p>	<ul style="list-style-type: none"> ● There is no standard for making claims on Omega3 under Codex. ● There is also not a widely adopted international standard for making claims on Omega3. ● The Administration is open to other non-Codex nutrition claims once they are widely adopted internationally.

	<ul style="list-style-type: none"> ● Having discussed with the trade, we have accepted their suggestion that a declaration in quantitative terms of the amount of these nutrients could be made, provided that such declaration does not emphasise the high/low content or presence/absence of that nutrient. This is in line with the US practice. ● To provide further facilitation to the trade, such a declaration would not be regarded as a nutrition claim.
<i>Hong Kong Dietitians Association and Hong Kong Nutrition Association</i>	
<p>The Government should regulate taste claims like “less sweet”, “less oily” and “less salty”</p>	<ul style="list-style-type: none"> ● Sweet taste could be due to the presence of sugars or other non-sugar sweeteners. Sweeteners are regulated under the Sweeteners in Food Regulations (Cap 132U) and are regarded as food additives that need to be included in the food labels. ● “Less sweet” claims as well as similar claims such as “Less oily”, “Less salty” claims are referring to sensory parameters, which are difficult to compare and standardize. These claims may or may not be directly related to nutrient values. ● As these taste claims are not regarded as nutrition claims, they are not regulated under the nutrition labelling scheme. Such practice is in line with international practice. The Administration will discuss these issues with the trade. ● That said, the Administration is aware that such taste claims are available in the market and consumers may take these claims to indicate the nutritional value of the food products. The Administration will cover this aspect in the publicity programme to educate consumers on how to read food labels and choose healthy food.
<p>The serving size should be included in</p>	<ul style="list-style-type: none"> ● There is no standard format for expression of energy and nutrient value in the food labels among different jurisdictions. For some countries, energy and nutrient value could be

the nutrition labels	<p>labelled in per 100 g/ml format while others require the labelling in per serving format. Some countries further require the labelling of energy and/or nutrients in both formats and some allow flexibility for the food traders to choose either one.</p> <ul style="list-style-type: none"> ● We see merits in the different approaches. For labelling of nutrients, labelling in per 100 g/ml will facilitate comparison between different products by consumers but labelling in per serving format (e.g. 3 cookies as one serving) is more easily understood by laymen. ● Since different labelling methods are adopted by different jurisdictions and stipulating a rigid format will necessitate re-labelling of the food products of certain countries (even though the information on core nutrients are all there in the packages), we consider that we should allow flexibility in this area.
Loophole in small volume exemption scheme as food products of different flavours will be regarded as different food	<ul style="list-style-type: none"> ● Under the Amendment Regulation, small volume exemption will be granted if the annual sales volume of food product of the same version would not exceed 30 000 units. ● The Administration will take into account the barcode, ingredients/formula used, packing size, flavour, name of manufacturer/packer and nature of the containers, etc to determine whether the food sold is of the same version. ● It must be noted that when there is more than one food importer for the same version of food, the cumulative sales volume of the product will be counted towards the cap of 30 000 units. ● The Administration noted the advice of LegCo Members during discussion at the 18 April 2008 Subcommittee meeting and will consider moving amendments to specify in the Amendment Regulation the criteria for regarding food as “same version”.
<i>Hong Kong Dietitians Association</i>	
The nutrition labelling	The Government plans to implement the nutrition labelling scheme on 1 July 2010.

<p>scheme should commence on 1 July 2010</p>	
<p><i>Hong Kong Nutrition Association</i></p>	
<p>The Government should actively enforce the legislation on nutrition labelling upon implementation and set up a complaints hotline for consumers on false labelling</p>	<ul style="list-style-type: none"> ● The Government plans to check some 55 000 food labels in the market on an annual basis to ascertain whether they comply with the labelling requirements, including the claim conditions. ● In addition, prepackaged food will be tested as necessary to verify the accuracy of the labelling. ● The Government also recognises the importance of promoting to the public the benefits to be derived from food labels and educating them on how to read the nutrition information on the labels. A special Task Force on Nutrition Labelling Education comprising representatives from various professional organizations (e.g. the Hong Kong Medical Association) and Government Departments has been set up to coordinate public education and promotion activities on nutrition labelling. ● Consumers may contact the Centre for Food Safety or the Consumer Council if they have doubts on the accuracy of information provided in the nutrition labels.
<p><i>Hong Kong Medical Association</i></p>	
<p>Cholesterol, calcium and dietary fibre should be included as core nutrients</p>	<ul style="list-style-type: none"> ● Cholesterol is not included because we consider saturated fat and trans fat (which are included as core nutrients for labelling) are more important risk factors for cardiovascular disease. ● As for calcium and dietary fibre, they only exist in a small range of prepackaged food like milk and cereal products. Food products with substantial amount of these two nutrients, in

	<p>some cases may be due to fortification, usually come with claims, meaning that the nutrient value has to be listed as a claimed nutrient.</p>
<p>The nutrition label of infant formula should also be regulated</p>	<ul style="list-style-type: none"> ● As the nutrition labelling for infant formula is regulated under another set of Codex standards, our nutrition labelling scheme for prepackaged food would not cover infant formula. ● However, it must be noted that infant formula, like any other prepackaged food, have to comply with the existing general food labelling requirements.
<p><i>Hong Kong Suppliers Association</i></p>	
<p>The registration fee for small volume exemption at \$345 and \$335 for new and renewal applications are too high. The fee should be set at \$50 per product</p>	<ul style="list-style-type: none"> ● The Administration has discussed with the trade to streamline the procedures for small volume exemption. ● Full-cost recovery fee of \$345 (new) and \$335 (renewal) for small volume exemption applications is calculated in strict accordance with the established formula approved by the Financial Services and Treasury Bureau for calculating Government fees and charges. ● For a product with sales volume of 30 000 units, the unit cost is about \$0.01; even if the sales volume is as low as 3 000 units, the unit cost is about \$0.1 only. ●
<p><i>Care for Your Heart</i></p>	
<p>Nutrition labels should be easy to read and should be in Chinese</p>	<ul style="list-style-type: none"> ● The Amendment Regulation stipulates that the nutrition label shall be presented in tabular form in a conspicuous place of the package and be legibly marked. ● Nutrition information would be required to be listed in either Chinese or English. If both the

language	<p>English and Chinese languages are used in the labelling of prepackaged food, the nutrition information shall also appear in both languages. This is in line with the general food labelling requirements for prepackaged food.</p> <ul style="list-style-type: none"> ● If we stipulate that all food labels have to be in Chinese, it will cause considerable difficulties for the trade. ● While we consider that a flexible approach should be adopted in the language requirement for nutrition labelling, we believe that the trade is in the best position to decide the consumer target of their products and provide them with the necessary information in an appropriate manner.
Cholesterol should be included as core nutrient	<ul style="list-style-type: none"> ● Please refer to response to Hong Kong Medical Association.
<i>Ms Ellen Friedlander</i>	
Concerned about impact on food choice, e.g. low fat, low sugars, trans fat free, gluten-free, lactose-free products, etc.	<ul style="list-style-type: none"> ● The Administration has set the food standards for making claims in strict accordance with Codex (where Codex has a standard). No deviation has been made. It means that food products with “low fat” and “low sugars” claims may continue to be sold in the Hong Kong market provided that they meet the standards and comply with Hong Kong’s labelling requirements. ● Gluten-free and lactose-free are not regarded as nutrition claims. Hence, these products will not be affected by the nutrition labelling scheme. ● For trans fat free claim, please refer to response to Ms Ellen Friedlander below.

<p>Hong Kong's nutrition labelling scheme is most unique in the world</p>	<ul style="list-style-type: none"> ● The Codex Guidelines recommend that when nutrition label is applied, it should include declarations of energy, protein, carbohydrates and fat, and any other nutrients which are considered to be relevant for maintaining a good nutritional status in the population concerned. Different countries have therefore adopted different requirements on nutrition labelling having regard to their own public health needs. ● While the number of core nutrients may be different among countries, we have included ample flexibilities in the labelling format. For example, we allow energy to be labelled in either kilo-calorie (US, Canada) or kilojoule (Australia) (EC requires labelling in both), nutrients to be labelled in either per 100g/100ml (EC) or per serving format (US/Canada) (Australia requires labelling in both), carbohydrates to be labelled as either available carbohydrates or total carbohydrates, and food products which label nutrients in % NRV format to follow any NRV adopted by health authorities. We also have no requirement on the position and size of the nutrition labels. <u>No other place have allowed such ample flexibility.</u> ● The standards for making claims in Hong Kong are in strict accordance with the Codex (where Codex has a standard). ● We have notified the World Trade Organisation (WTO) about the nutrition labelling scheme right after the LegCo Panel has discussed the scheme in December 2007. We have received no comments or objection from other WTO members except the US which has requested further information.
<p>Standard of trans fat free in Hong Kong is different from other</p>	<ul style="list-style-type: none"> ● For trans fat free claim, despite there is no standard in Codex and in the Mainland (GB), we note the trade would very much like to make such claim and the public is also concerned about trans fat in food which has an adverse effect on health. ● We have set the standard at 0.3g of trans fat per 100g of food and two conditions. For solid

countries	<p>food, the conditions are (i) not more than 1.5g of saturated fatty acids and trans fatty acids combined per 100g of food; and (ii) saturated fatty acids and trans fatty acids, the sum of which contributes not more than 10% of energy. In the case of trans fat level, we have tried to strike a proper balance between the more stringent requirements (e.g. Malaysia – 0.1g/100g) and the more lax standards such as the US rounding rule (0.5g/serving). For the two other conditions, they are in line with Codex standards for “low saturated fat” and “low cholesterol” claims.</p> <ul style="list-style-type: none"> ● For Members’ reference, in Canada, provided that the food (a) has less than 0.2g of trans fat per serving, (b) contains 2g or less of saturated and trans fat combined per serving; and (c) provides 15% or less energy from the sum of saturated and trans fat, it could be labelled as trans fat free. In Taiwan, the standard is 0.3g of trans fat per 100g of food. ● With the popularity of deep fried food in the Chinese cuisine that contribute to dietary intake of trans fat, and the World Health Organisation’s recommendation of a daily trans fat intake of less than 2.2g, the condition of 0.3g/100g was necessary to protect consumers from over-consumption of trans fat. ● If someone consumes four servings of food (each serving could be as low as 30g) claimed as trans fat free under the US’ standards (meaning it may contain at most 0.5g of trans fat per serving), he has almost reached the daily intake amount as recommended by WHO.
The opinion poll conducted by the Government is misleading	<ul style="list-style-type: none"> ● The Administration appointed the Hong Kong Polytechnic University to conduct a public opinion survey on the nutrition labelling scheme from 18 April 2008 to 22 April 2008. Survey population was randomly selected from the residential phonebook. ● The five questions included in the opinion poll are – <ul style="list-style-type: none"> (1) Some of the prepackaged food claim that they have “high calcium”, “low fat” , “low sugars”, or “low cholesterol” content, etc. Do you think that these food should list out

	<p>the nutritional information to justify their claims?</p> <p>(2) If the nutrition labelling scheme, which will require prepackaged food to list out the nutritional information, will lead to a reduction in food choice, do you think it is still worth it?</p> <p>(3) To help the trade to comply with the new requirements, the Government will provide for a grace period before implementation of the nutrition labelling scheme. Do you think a two-year grace period is too long, appropriate or too short?</p> <p>(4) Do you agree to exempt those food products which are imported or manufactured in small volume from the nutrition labeling requirements so as to reduce the impact on food choice and the operating cost of the trade?</p> <p>(5) Do you think it is reasonable that prepackaged food products which claim to have “high calcium”, “low fat”, “low sugars” or “low cholesterol”, regardless of its import or manufacturing volume, should list out the nutritional information to justify their claims and should not be exempted from the nutrition labelling requirements?</p> <ul style="list-style-type: none"> ● In total, 860 respondents aged 18 or above were successfully enumerated by telephone interviews. ● 93% of the respondents considered that prepackaged food with nutrition claims should list out the nutrition information to support the claim. Some 81% of the respondents considered that it is worthwhile to implement the nutrition labelling scheme even if it will result in reduction in food choice. ● On the small volume exemption scheme for food products with annual sales volume of 30 000 or below, it is noted that the public generally does not support such relaxation. Some 66% of the respondents do not agree with the small volume exemption scheme at all. And over 90% of the respondents considered that it is reasonable to require all prepackaged food with claims, regardless of its sales volume, to set out the nutritional information.
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	<ul style="list-style-type: none"> As to the grace period, over 54% of the respondents considered that the two-year grace period is already too long and some 39% considered that it is appropriate.
<p><i>Professor Richard Fielding (School of Public Health of the University of Hong Kong)</i></p>	
<p>Advertisement published by HKRMA on 25 April 2008 is misleading. Many prepackaged foods photographed in the advertisement are not healthy food.</p>	<ul style="list-style-type: none"> Noted.
<p><i>Hong Kong Retail Management Association</i></p>	
<p>Estimated that 15 000 healthier products will disappear from the market because of nutrition labelling</p>	<ul style="list-style-type: none"> According to the Regulatory Impact Assessment (RIA) which is based on information provided by the trade, product variety in a supermarket is about 20 000 – 30 000 only. Change in product variety is also a normal trade practice (according to the RIA, average annual turnover rate of food products is about 14%). The trade and the Consulates General claimed that only 5% of the products are imported in small volume and half of them (2.5%) carry claims. We consider that the estimate of 15 000 products leaving the market is over exaggerating. We doubt whether the 15 000 so-called healthy products are really healthy products.

	<ul style="list-style-type: none"> ● We also note that some of the food products that the trade claimed will be withdrawn from the market as pictured in their advertisement actually comply in full with the nutrition labelling requirements and could continue to be sold in Hong Kong without any need for re-labelling. ● The RIA stated that it is a common practice among food manufacturers to redesign food packages on a regular basis and the RIA survey showed that some 73% of the food products are specifically packaged for the Hong Kong market. ● If food traders consider that the nutrition information should not be provided to consumers, and the products are sold in small volume, they may choose not to make the claim in order to enjoy the small volume exemption.
<p>The Hong Kong's Nutrition Labelling Scheme does not follow Codex standards</p>	<ul style="list-style-type: none"> ● The Codex Guidelines recommend that when nutrition label is applied, it should include declarations of energy, protein, carbohydrates and fat, and any other nutrients which are considered to be relevant for maintaining a good nutritional status in the population concerned. Different countries have therefore adopted different requirements on nutrition labelling having regard to their own public health needs. ● The Administration has set the food standards for making claims in strict accordance with Codex (where Codex has a standard). No deviation has been made. ● For certain claims where Codex does not have a standard, we have followed the standard of the Mainland (GB). There are two such cases: low sugars and low protein. ● For trans fat free claim, please refer to response to Ms Ellen Friedlander above.
<p>Hong Kong should accept food products which already carry nutrition labels</p>	<ul style="list-style-type: none"> ● From the legal point of view, it would be impossible to enforce the nutrition labelling legislation of overseas countries. Prosecution would have to prove compliance of overseas legislation which is legally undesirable. It is also inappropriate to allow overseas legislation to override local legislation.

<p>complying with source country requirements</p>	<ul style="list-style-type: none"> ● While there are a number of local legislation which refer to overseas standards, they are mostly related to safety standards. In the Electrical Products (Safety) Regulation (Cap 406G), it is provided that “No person shall supply an electrical product unless a certificate of safety compliance has been issued...”, and the certificate must state, among other information, that “a standard to which the electrical product was tested”. The acceptable international standards for electrical products are set out in Cap 406G. Similar provisions could be found in the Toys and Children’s Products Safety Ordinance (Cap 424). These legislation have adopted international standard for the products concerned, rather than stipulating that the product should comply with the different requirements of the source countries. ● From the international trade perspective, if we require compliance with source countries’ labelling requirements, it might be construed as unfair trade practice because different source countries supplying the same type of product might be adopting different requirements. ● From the practical point of view, a brand of Country A might be produced in Country B and packed in Country C. There would be practical difficulties in ascertaining which labelling standards should be adopted.
<p>The registration fee for small volume exemption at \$345 and \$335 for new and renewal applications are too high. The fee should be set at \$50 per product</p>	<ul style="list-style-type: none"> ● Please see response to Hong Kong Suppliers Association above.

<i>Federation of Hong Kong Industries</i>	
Supports a three-year grace period	<ul style="list-style-type: none"> • The nutrition labelling scheme has been put to public consultation since 2003. The public has been urging for its early implementation to protect public health. We do not propose to postpone the implementation any further.
Standard for trans fat free is different from other countries	<ul style="list-style-type: none"> • Please see response to Ms Ellen Friedlander above.
<i>Hong Kong Practising Dietitians Union</i>	
Agree that trans fat free claim should be set at 0.3g per 100 g of food	<ul style="list-style-type: none"> • Noted.
<i>Etak International Limited</i>	
Supports the view of Hong Kong Suppliers Association and Hong Kong Retail	<ul style="list-style-type: none"> • Noted.

Management Association	
<i>Ms Chan Shu-ying</i>	
Two-year grace period is sufficient	<ul style="list-style-type: none"> • Noted.
The penalty level for non-compliance of the nutrition labelling requirements should be at appropriate level to have deterrent effect	<ul style="list-style-type: none"> • Upon commencement of the Amendment Regulation, non-compliance with the nutrition labelling requirements will be an offence and is liable on conviction to a fine of \$50,000 and imprisonment of six months. • The penalty level is the same as other food labelling requirements.
<i>Civic Party</i>	
Trans fat should be included as core nutrient	<ul style="list-style-type: none"> • Trans fat has been included as one of the core nutrients for nutrition labelling.
To consider whether flexibility could be allowed in the	<ul style="list-style-type: none"> • The Administration has already included ample flexibilities in the labelling format for energy and nutrients. For example, we allow energy to be labelled in either kilo-calorie (US, Canada) or kilojoule (Australia) (EC requires labelling in both), nutrients to be labelled in

labelling of energy and nutrients	either per 100g/100ml (EC) or per serving format (US/Canada) (Australia requires labelling in both), carbohydrates to be labelled as either available carbohydrates or total carbohydrates, and food products which label nutrients in % NRV format to follow any NRV adopted by health authorities.)
To consider whether the grace period could be extended	<ul style="list-style-type: none"> ● Please see response to Federation of Hong Kong Industries above.
<i>Supervalu</i>	
There is already a reduction in some 1 500 food products in the market after the implementation of the labelling law on allergens and additives	<ul style="list-style-type: none"> ● The Administration has studied a list of some 170 products passed to us by the trade which were alleged to have left the market after implementation of the allergen/additives labelling law in July 2007. ● We note, however, that for some cases, the overseas food manufacturers have refused to provide the necessary information to the local food importers and for others, the additives used in the food are not permitted. ● According to the RIA, change in product variety is a normal trade practice and the average annual turnover rate of food products is about 14%. Withdrawal of products from the shelf is not necessarily related to allergen/additives labelling. ● Neither has the Consumer Council received any complaints about reduction in food choice after implementation of the allergen/additives labelling law.
The Codex standards	<ul style="list-style-type: none"> ● Please refer to response to the Hong Kong Retail Management Association above.

should be followed	
Estimated that 15 000 products would be withdrawn from the Hong Kong market	<ul style="list-style-type: none"> ● Please refer to response to the Hong Kong Retail Management Association above.
<i>Supervalu and American Chamber of Commerce</i>	
US products, especially healthier products, will disappear from the market	<ul style="list-style-type: none"> ● US and Canada adopt a “one plus 14/13” nutrition labelling scheme, which is more stringent than Hong Kong’s “1+7”. It follows that majority of the food products imported from the North American markets (whether they have claims or not) would have complied with our requirements. So are those overseas food products that are for export to the North American markets. ● It must, however, be noted that there are some differences between Hong Kong’s scheme and the US’ in that (due to a lack of common international standard) our standard for trans fat free claim is different and we will require claimed nutrients to be labelled in exact amount (and in the US, vitamins and minerals are labelled as a % of NRV). Other than these two differences, all food imported from the US should be able to come to Hong Kong without re-testing and re-labelling. ● Similarly, there are also differences between the nutrition labelling requirements in US and Canada. US adopts a “1+14” and Canada adopts a “1+13” labelling requirements. In addition to difference in the labelling of trans fat (see response to Ms Ellen Friedlander above), the NRV of the two countries are also different. It means that nutrients labelled in the

	<p>US as a % of NRV will have to be re-calculated and re-labelled in accordance with Canada's NRV, and vice versa.</p> <ul style="list-style-type: none"> ● In Hong Kong, we have accepted the trade's suggestion that nutrients (whether core or non-core, claimed or non-claimed) may be labelled as a % of NRV of any international health authorities. Hence, the need for re-labelling would be minimized.
<i>American Chamber of Commerce</i>	
The Government should accept nutrition labels that comply with requirements of source countries	<ul style="list-style-type: none"> ● Please refer to response to the Hong Kong Retail Management Association above.
<i>Hong Kong Food Science and Technology Association</i>	
Public education on nutrition labelling is very important	<ul style="list-style-type: none"> ● The Government recognises the importance of promoting to the public the benefits to be derived from food labels and educating them on how to read the nutrition information on the labels. A special Task Force on Nutrition Labelling Education comprising representatives from various professional organizations (e.g. the Hong Kong Medical Association) and Government Departments has been set up to coordinate public education and promotion activities on nutrition labelling.
The Food	<ul style="list-style-type: none"> ● Noted.

<p>Composition Database developed by the Chinese University of Hong Kong would help SMEs in working out the nutrient value of prepackaged food</p>	
<p><i>Dietitian Local Registration Task Force</i></p>	
<p>The nutrition labelling scheme should commence as soon as possible.</p>	<ul style="list-style-type: none"> • The Government plans to implement the nutrition labelling requirement on 1 July 2010.
<p><i>Mr Eric Choy</i></p>	
<p>The nutrition labelling scheme should commence as soon as possible.</p>	<p>The Government plans to implement the nutrition labelling requirement on 1 July 2010.</p>
<p><i>Committee on Home-School Co-operation</i></p>	

<p>The nutrition labelling scheme should commence as soon as possible.</p>	<ul style="list-style-type: none"> • The Government plans to implement the nutrition labelling requirement on 1 July 2010.
<p><i>Alliance for Renal Patients Mutual Help Association</i></p>	
<p>The original proposal of “1+9” would be more useful for patients</p>	<ul style="list-style-type: none"> • Compared with the “1+9” proposal put forward by the Administration in 2005, we have taken out cholesterol, calcium and dietary fibre from the list of core nutrients and added trans fat to the list. Cholesterol is taken out because we consider saturated fat and trans fat are more important risk factors for cardiovascular disease. As for calcium and dietary fibre, they only exist in a small range of prepackaged food and food products with substantial amount of these two nutrients, in some cases may be due to fortification, usually come with claims, meaning that the nutrient value has to be listed. Trans fat has been added because of its internationally recognized adverse effect on health.
<p>Nutrition labels should be in both English and Chinese</p>	<ul style="list-style-type: none"> • Please refer to response to Care for Your Heart above.
<p><i>Diabetes Hong Kong</i></p>	
<p>Support commencement of nutrition labelling</p>	<ul style="list-style-type: none"> • The Government plans to implement the nutrition labelling requirement on 1 July 2010.

scheme in two years	
<i>The Hong Kong Health Food Association</i>	
Health food should not be subject to nutrition labelling of prepackaged food and should be separately regulated	<ul style="list-style-type: none"> ● “Health food” is not specifically defined in legislation in Hong Kong. It is currently regulated under different legislation depending on their ingredients and/or their claims, if any, on the labels. Pharmaceutical products and proprietary Chinese medicines are regulated under the Pharmacy and Poisons Ordinance (Cap 138) and the Chinese Medicine Ordinance (Cap 549) respectively. Otherwise, such products would be regarded as food governed by the Public Health and Municipal Services Ordinance (Cap 132), which stipulates that food intended for sale should be fit for human consumption. Furthermore, the Undesirable Medical Advertisements Ordinance (Cap 231) prohibits the publishing of advertisements likely to lead to the use of medicine, surgical appliances and treatment for the prevention or treatment of diseases or conditions specified in its Schedules. ● For health food products which are regulated under Cap 132, they have to comply with the requirements stipulated under Cap 132, including food labelling requirements. ● While health food may be exempted from the general labelling requirements in some overseas countries, they are either subject to the labelling requirements of drugs or dietary supplements.
<i>Hong Kong General Chamber of Commerce</i>	
Hong Kong’s nutrition labelling is more stringent than the	<ul style="list-style-type: none"> ● Please refer to response to the Hong Kong Retail Management Association above.

Codex guidelines	
<i>Good Food Watch</i>	
Supports labelling of trans fat for prepackaged food and eventually to non-prepackaged food	<ul style="list-style-type: none"> ● Trans fat is included as one of the core nutrients under the nutrition labelling scheme for prepackaged food. ● Food labelling under Cap 132 is applicable to prepackaged food only. There would be grave difficulties to impose labelling for non-prepackaged food.
Supports the standard for trans fat free claim	<ul style="list-style-type: none"> ● Noted. Please also refer to response to Ms Ellen Friedlander above.
Advertisement of HKRMA is misleading to consumers	<ul style="list-style-type: none"> ● Noted.
<i>Hong Kong College of Cardiology</i>	
Supports the standard for trans fat free claim	<ul style="list-style-type: none"> ● Noted. Please also refer to response to Ms Ellen Friedlander above.
Nutrient claim for	<ul style="list-style-type: none"> ● There is no standard for making claims on Omega3 under Codex. There is also not a widely

<p>Omega3 should not be allowed</p>	<p>adopted international standard for making claims on Omega3. Hence, no nutrition claim on Omega3 could be made.</p> <ul style="list-style-type: none"> ● Having discussed with the trade, we have accepted their suggestion that a declaration in quantitative terms of the amount of these nutrients could be made, provided that such declaration does not emphasise the high/low content or presence/absence of that nutrient. This is in line with the US practice. ● To provide further facilitation to the trade, such a declaration would not be regarded as a nutrition claim.
<p>E-trading of food should also be regulated</p>	<ul style="list-style-type: none"> ● The nutrition labelling requirements would apply to all prepackaged food sold to the ultimate consumer or a catering establishment as a single food item. It does not matter whether the sale is by traditional sales method or by e-trading.

**Food and Health Bureau
May 2008**