

TO: Director of Food and Environmental Hygiene Department

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

**Hong Kong Nutrition Association (HKNA) and Hong Kong Dietitians
Association (HKDA)
Position Statement**

The HKNA and HKDA hereby support the followings:

1. There shall be NO exemption to all small volume foods with health claims.

According to the survey carried out by HKNA and HKDA in mid April 2008, we found that out of the 597 surveys collected, 91.6% of consumers will be immensely convinced by nutrition claims resulting in purchasing the “claimed” products. However, foods with nutrition claims may not necessarily be "healthy". For example, a box of cookie which claimed to be "low fat" can in fact be "high sugar" and “low in fiber”. Many consumers will be misled by the "low fat" health claim if there is no complete nutrition information listed on the label.

It is not acceptable for any exemption for products with claims, even if the products carry a "warning label", as it contradicts and defeats the purpose of food labelling. Besides, we are afraid that food manufacturers/importers will use the “warning label” as shield to import small volume products which does not comply with any countries’ food labelling law. Consequently, Hong Kong might become a “dumpster” of those small volume food products without proper food labels. We insist that products without sufficient nutrition information will cause further confusion to the consumers, and they may not be able to judge if the products are healthy or not. Consumers may still be attracted by the nutrition claims and fall into the trap of health frauds.

2. We suggest the government to omit the nutrient content claim of “zero trans fat” or “trans fat free”.

According to WHO, one should be aiming to consume “as little trans fat in the diet as possible”. Or in the 2,000 kcal diet, one should not consume more than 2.2g trans fat per day. Trans fat has been strongly proven to increase of risk coronary heart

disease. Thus to protect the health of the public, consumer has the right to know clearly and precisely how much trans fat is contained in food products

At present, a nutrient content claim of “zero trans fat” or “trans fat free” is only allowed in few countries (E.g. Canada 0.2g/sering; Malaysia 0.1g/100g) and since there is so much argument and controversy about the definition of the nutrient content claim of “zero trans fat” or “trans fat free” in the proposal, we suggest the government to omit such claim. This could help reduce the public’s desirability to buy products with such claims (again, zero trans fat products are not necessarily healthy!) Also, it allow products which already have trans fat stated in their products to be imported with minimal changes on their original food labels.

Along with the above omission, we suggest the government to maintain the rounding rule for trans fat in the food label to the lowest as possible based on scientific evidence and also referring to the WHO recommendation that one should consume trans fat “as little as possible”.

Presented by:

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16th May, 2008

Appendix I.

香港營養師協會 - 有關消費者對『營養資料標籤制度』問卷調查

A. 就香港政府為預先包裝食物新訂立的營養資料標籤制度，請協助回答以下問題：

1. 當你購買預先包裝食物時看見包裝上有例如「少糖」、「低脂」、「高纖維」、「高鈣」等營養聲稱，會否較吸引你去購買？
 多數會 有時會 不會
2. 你認為食物上標明「少甜」是否等同健康的選擇？
 是 否 不知道
3. 你認為香港政府是否應該立法管制以「味覺」作健康聲稱的產品（例如「少甜」、「少鹹」、「少肥」等）？
 應該 不應該
4. 你認為食品標籤上是否應該例明「建議食用份量 (Suggested Serving Size)」(例如：1包、10粒、5塊、1杯等)？
 應該 不應該
5. 你認為食品標籤上是否應該例明「膽固醇 (Cholesterol)」的含量？
 應該 不應該
6. 你認為食品標籤上是否應該例明「膳食纖維 (Dietary Fiber)」的含量？
 應該 不應該
7. 你認為食品標籤上是否應該例明「鈣質 (Calcium)」的含量？
 應該 不應該
8. 你每星期食用預先包裝食物多少次？
 0次 1-5次
 6-10次 10次或以上

B. 個人資料 - 請提供以下資料:

1. 你是否長期病患者 (例如糖尿病、心臟病、血壓高、痛風症等)?

是 否

2. 你的年齡:

20 歲以下 21 - 40 歲 41 - 60 歲 60 歲以上

3. 你的教育程度:

小學程度或以下 中學程度

大專/大學程度 大專/大學程度以上

----- 多謝 ! -----

Appendix II.

Hong Kong Dietitians Association & Hong Kong Nutrition Association

Survey Report on the Revised Nutrition Labelling Scheme of Hong Kong

(Date: 22/11/2007)

Summary:

The Hong Kong Nutrition Labelling Scheme which was first proposed in 2004 is currently under revision by the Food and Environmental Health Department (FEHD) and the Hong Kong government. And it will soon be submitted to the Legislative Council for final ruling at early 2008. The Hong Kong Dietitians Association (HKDA) and Hong Kong Nutrition Association (HKNA) deeply concern that the revised scheme with an abbreviated nutrient list (E (energy) + 6 core nutrients) will affect consumers' right to understand nutrition content of packaged foods in Hong Kong. Besides, there are other controversial debates among our profession on energy/nutrient expression, nutrient content claims, requirement of % Nutrient Reference Value (%NRV), food exemptions and appropriate timeframe of implementing the mandatory scheme. Therefore, we have implemented a survey in mid-November 2007 among nutrition professionals to obtain some collective standpoints.

Completed surveys were successfully collected from 73 nutrition professionals to obtaining collective standpoints. The following results are released on a press conference on 22nd November, 2007.

- Food portion should be expressed in both “per serving” and “per 100g”.The advantages of both expressions can compensate each others' functional shortages.
- Supports to keep the E + 9 nutrients scheme. Listing dietary cholesterol, calcium and dietary fiber help improve public's health.
- Trans fat should be mandatory and “trans fat” (70%) claims with legal definition are also strongly supported. Mandatory listing of trans fat can improve heart health of the public.
- Strongly suggests “Low sugar” claim with legal definition.
- Should not apply exemption for products in “small demand”.
- % NRV can be optional.
- Strongly urge the government to implement the scheme with no hesitation based on consumers' right on nutrition knowledge and also to improve the health of the public as soon as possible.