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Secretary

Subcommittee on Food and Drugs (Composition and Labelling)

wmcheung@legco.gov.hk

May 26, 2008

Dear Sir/madam,

Ref: Requirement for Nutrition Labeling and Nutrition Claim

Administration's latest proposal related to prepackaged food products with nutrition claims and transfat level

Further to my previous submission, I would like to express my view of the latest proposal related to prepackaged food products with nutrition claims and transfat level. I have expressed strongly the importance of high standard of nutritional labeling is essential to improve the health literacy of our community to combat the second wave of epidemics of chronic illnesses related to changing of lifestyles. The exemption of low sales volume products is already the biggest concession. However if those small volume products want to make nutrition claims, they should follow the requirement of Hong Kong for Nutrition Labeling. The warning label serves no purpose apart from confusing the public and creates ambiguity. It is difficult to be convinced that nutrition labeling according to the original proposed requirement of Hong Kong SAR Government would lead to disappearance of those small volume products. I predict that it should be the opposite for healthy food products if they are labeled in more details. This would help our consumers to make healthy decision.

Hong Kong is first class International City and we are proud of our rule of law. High standard of requirement for nutrition labeling for better health of our population should also be our priority. We must have our Ordinance on requirement of Nutrition Labeling and Nutrition Claim as international benchmark.

I have already summarized the importance of good nutritional labeling to improve health literacy in order to prevent the preventable diseases related to lifestyles. The major burden of health is caused by diseases that are not curable but preventable. I have noted that many health professionals have expressed similar views. The Government has recently produced a consultation document on health care reform. The root of many current health problems is related to unhealthy lifestyles and unhealthy and unbalanced diet is very important factor. There have been a lot of

public health movements in Hong Kong by both Government and non-government sectors to promote healthy eating with great success. Legislation to regulate nutrition labeling would add synergistic effect to those health promotion programmes. However if the requirement of nutrition labeling is a compromise, it will have strong detrimental effect on future health promotion on healthy eating. Therefore I strongly urge the Government to adhere to the original proposal and NOT to compromise with NO exemption to small volume goods with health claims. The “zero trans-fat” or “trans fat free” claim is not truly “zero”. One should consider to OMIT the nutrient claim of “zero trans-fat” or “trans fat free sooner than later.

The scientific evidence is strong to show the importance of healthy eating to good population health. It is beyond doubt that high standard of nutrition labeling is essential for consumers to make the healthy choice. Investment in health of the population is crucial for sustainable development of the society. There should be NO compromise on the health of our society. I strongly urge the Honorable Legislative Councillors to urge the Government tabling the original proposal for enactment. Legislation on requirement of Nutrition Labeling in proper standard must NOT be further delayed and compromised for any other reasons EXCEPT health.

Thank you four your kindest attention!

Yours sincerely,

A handwritten signature in black ink, appearing to be the initials 'AL' followed by a horizontal line.

Professor Albert Lee

(Professor and Director of Centre for Health Education and Health Promotion)