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May 23, 2008
The Secretariat,
Legislative Council
Attn: Mrs. Flora Tai
The Government of Hong Kong SAR
Chater Road, Hong Kong

Dear Sir/Madam

Re: Amendment Requirement for Nutrition Labeling
And Nutrition Claim Regulation 2008

The Hong Kong College of Cardiology supports the Hong Kong Government's Proposal of introducing a Nutrition Labeling Scheme for prepackaged foods in Hong Kong, based on the following principles:

1. To assist consumers in making informed (based on true and unambiguous data) food choices
2. To encourage food manufacturers to apply sound nutrition principles in the formulation and manufacturing of foods, and
3. To regulate misleading or deceptive labels and claims.

We believe the above legislation is timely, albeit a bit late, but it is a step in the right direction.

We do not see any need for exempting small volume food products, i.e. those with annual sales of 30,000 units or less, excluding those with nutrition claims, but we can understand the Government's position and it's need to take into consideration of the industry by making a concession for small volume food items to be exempted with a grace period of two years, i.e. up to July 1, 2010.

We find it difficult to understand why the Government is now prepared to extend the exemption to cover those products with nutrition claims under small volume exemption through the addition of a warning label. We find this neither logical nor reasonable. It would certainly cause more confusion among consumers, and we are afraid it could well become a laughing-stock in the community and internationally. Furthermore, it could set a dangerous precedence because the warning label could be seen as a signal that the Government's stance on this legislation is not strong, allowing loopholes before the law is even enacted!

We support the "transfat free or 0 transfat" content of foods to be set at 0.3 gm per 100 gm of food, because it is more in line with the current WHO's recommendation.

Finally, we want to emphasize the following points:

1. The health of the people of Hong Kong should take top priority, over and above commercial interests.
2. The Nutrition Labeling Scheme should be implemented along with a long-term health protection education program for the community.

Yours sincerely,

Dr. Chiu On Pun
President
Hong Kong College of Cardiology

Dr. Patrick Ko
Council Member and Past President
Hong Kong College of Cardiology

Dr. Chris Wong
Hon. Secretary
Hong Kong College of Cardiology