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**Legislative Council Subcommittee on Food and Drugs  
(Composition and Labelling) on  
(Amendment: Requirements for Nutrition Labelling and Nutrition Claim) Regulation 2008**

**HKDU stand on Nutrition Labelling**

Hong Kong Doctors Union maintains her support for the spirit of the captioned amendment regulation. HKDU also supports the addition of trans fat into the list of requirement.

However, in the course of providing our citizens with nutrient information to reduce harmful factors for non-communicable diseases and to allow dietary management of non-communicable disease, the amendment regulation should take into consideration the developments of food label requirements overseas since Hong Kong imports most of its products abroad.

Since this is the first time that Hong Kong adopts a stringent food labelling scheme, we do believe that there would be future revisions to the requirements to meet scientific advances in the course of time. We believe the threat of loss of a large number of presently available low fat and other nutritional products with clear labeling and health claims is real.

We maintain the public will benefit more if we accept that for non-core nutrient claims to allow either relative amount expression or the absolute value of nutrients to back up their claims. We believe our proposal also applies equally to food products having sales volume less than 30,000 per year since their existing claims already comply with the most stringent overseas laws and are fully backed up by the detailed nutritional panel on the package. We maintain by extending exemption to these products we ensure the public reliant on them for medical and health reasons have adequate supply. As such we welcome the government's latest proposal in "small volume exemption for food products with nutrition claims" coded LC Paper No. CB(2)1970/07-08(1) and the proposal in "Labelling of Trans Fat on nutrition labels" coded LC Paper No. CB(2)1970/07-08(02).

We are disappointed that there is no provision for more flexible treatment of products purely and simply stating containing certain ingredients not explicitly allowed in the government's proposals list, which we believe cannot cover all possible health related nutrients. Since, statements indicating the presence/absence of a particular nutrient in the label would not mislead the public to think that particular nutrient is superior but give factual information, we do believe these wordings without claims should be flexibly treated and allowed. For example labels claiming "this product contains ascorbic acid" does not claim to have higher amount at all and should be allowed.