



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

26 May 2008

Dear Chairman,

RE: Proposed Food and Drugs (Composition and Labelling)
(Amendment: Requirements for Nutrition Labelling and Nutrition Claim)
Regulation 2008

The administration's latest proposals relating to prepackaged food products with nutrition claims and trans fat level

As a professional association consisting of multidisciplinary healthcare workers and scientists with special concerns on obesity and its effects on morbidity and mortality in Hong Kong, we, the Hong Kong Association for the Study of Obesity (HKASO), are writing in supporting the Government's proposal on staged implementation of Labelling Scheme on Nutrition Information.

Obesity is now a major public health problem in Hong Kong. According to a local epidemiological study in 1995, over one-third of Hong Kong adults were obese with a Body Mass Index (BMI) ≥ 25 kg/m². Obesity-related diseases including certain types of cancers, coronary heart disease, cerebrovascular disease and diabetes mellitus are amongst the leading causes of death in Hong Kong. Proper labeling of nutrient contents and scientifically supported nutritional and functional claims should allow the general public to make more appropriate food choices and facilitate healthcare

providers to educate patients more effectively for disease prevention and management. This is of utmost importance from a public health point of view, and perhaps one of the most cost-effective measures in the long run, particularly for the prevention of childhood obesity which occurs currently at a rate of 20% among our primary school students

Our Association considers that mandatory nutritional labelling for prepacked food products should be enforced through legislative amendment to the regulations made under the Public Health and Municipal Services Ordinance (Cap 132). Many developed countries such as the United States, European Union and Japan have already taken an active role in regulating nutrition information on food labels. It is therefore important that the Hong Kong SAR Government should not further delay the implementation of this long overdue regulation in light of the magnitude and urgency of obesity-related health problems.

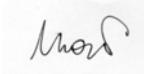
We support the initial approach of the Amendment Regulation to require all prepackaged food to label energy plus seven core nutrients, namely protein, carbohydrates, total fat, saturated fat, trans fat, sodium and sugars, as well as any nutrient for which a claim is made. We also welcome the inclusion of a small volume exemption scheme for food products with annual sales volume of 30,000 units or below as a measure to balance public health interest and availability of niche products for special groups. **However we will be strongly against the view of allowing any exemption to nutrition claims to small volume products of annual sales < 30,000 units (which includes nutrient content claim, nutrient comparative claim and nutrient function claim). We believe all imported products should just list out their factual nutrient analysis and we need to educate the general public to understand and interpret the information in order to make their own judgments. The recent publicities from importers threatening the disappearance of large number of quality products from Hong Kong market were over-exaggerated and unsolicited.** Once the nutrition knowledge of the general public advances and demands increase, quality products will come to Hong Kong to fill in the gap and we do believe valuable choices of prepacked food items will not be jeopardized.

We also feel that we should keep our original proposal and definition of zero round-up of trans fat level without any amendment or compromise. Otherwise our consumers will be confused and may fall into the traps of taking too much of very bad fats (trans fat) without any awareness.

In conclusion, it is the position of the HKASO to support the Government to have a strong standpoint to advocate the current Food and Drugs (Composition and Labelling) Regulation 2008 without any further amendment or delay. We also fully support all those Legco members (no matter what political parties they belong to) who were elected by the public and truly serve the public to vote against these 2 amendments and HKASO will be pleased to provide any related scientific information if required.

With very best wishes.

Yours faithfully,



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For and on behalf of the Hong Kong Association for the Study of Obesity

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