



School of Public Health

2/F., School of Public Health
Prince of Wales Hospital
Shatin, N.T., Hong Kong
<http://www.sph.cuhk.edu.hk>

公共衛生學院
香港新界沙田威爾斯親王醫院
公共衛生學院二字樓
TEL 電話：(852) 2252 8488
FAX 傳真：(852) 2145 7489

Hon Bernard CHAN, GBS, JP
Chairman of Subcommittee

立法會 CB(2)2072/07-08(06)號文件
LC Paper No. CB(2)2072/07-08(06)

26 May 2008

Dear the Hon Mr CHAN,

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

**The Administration's latest proposals
Relating to prepackaged food products with nutrition claims
And trans fat level**

We would like to express support from the School of Public Health (SPH) of The Chinese University of Hong Kong toward the nutrition labelling scheme proposed by the Hong Kong Government, and to state our stance toward the recent debate on the two proposed amendments under the scheme which includes extending the exemption for nutrient labeling to cover small volume sales items with nutrition claims and the relaxation on labelling requirement on trans fat.

Implementation of the nutrition labelling scheme

The growing epidemic of obesity and chronic degenerative diseases in Hong Kong highlights the pivotal role of healthy eating as a preventive measure in public health context. Poor diet, especially diet high in energy, fat and sodium has been linked with various cancers, cardiovascular diseases and cerebral-vascular accidents contributing the highest medical cost. Nevertheless, Hong Kong citizens are confused about what they are eating because there has been no regulation on nutrition labeling among foods or drinks sold in the territory. In fact, surveys indicated 60-80% of food shoppers in US read food labels before buying a new food items. About 30-40% of them mentioned food labels had influenced their choice (1-3). Also, there has been considerable confusion caused by fad diet advocates, and studies reported by the media. This confusion has generated distrust of all dietary recommendations and a corresponding desire for nutrition information on food package that is clear, authoritative, and easy to understand. In view of the above considerations, the SPH strongly supports the movement toward a more informational food market by implementing the nutrition labelling scheme.



School of Public Health

2/F., School of Public Health
Prince of Wales Hospital
Shatin, N.T., Hong Kong
<http://www.sph.cuhk.edu.hk>

公共衛生學院
香港新界沙田威爾斯親王醫院
公共衛生學院二字樓
TEL 電話：(852) 2252 8488
FAX 傳真：(852) 2145 7489

Exemption for nutrient labelling to cover small volume sales items with nutrition claims

The Government has proposed the provision of small volume exemptions for nutrient labelling for products that sell less than 30,000 units per year. Debate was then raised to whether or not this exemption should also be granted to products that carry nutrition claims. Representatives from the traders deem that a drastic reduction of healthy product choices in the market will result if no exemption was granted to products with nutrition claim. The SPH holds a different perspective. Foods with nutrition claims could be misleading. One daily example is the searching for diabetic friendly foods. Products with low sugar nutrition claims are generally welcome by diabetics. However, one should bear in mind that other than sugar content there are also other important nutrients that affect the severity of the disease, with saturated fat being one obvious example. If nutrient labelling is not introduced with the nutrition claim made on the food package, there is no way to demonstrate whether the food matches the needs of the people choosing it. The exemption would also induce double standards that cause unnecessary confusion to lay consumers about “healthy food”.

Traders have also argued about the infringement of Hong Kong’s image as a vigorous free trade port upon the reduction of imported food products as a result of no exemption is granted to products with nutrition claims. However, the view of the SPH is that the initiative by the Government is a public health move toward a healthier Hong Kong. This alongside other public health initiatives protects the basic health needs of local citizens. The taxation on tobacco products in Hong Kong is an excellent example illustrating the need to balance public good and private choice. We would never preach smoking regardless of how much trading revenue it could generate!

Labelling requirement on trans fat

Recent interest in the health effects of trans fat has centered largely around potential adverse effects of trans fat on lipid risk factors for cardiovascular disease, including markers of enhanced inflammatory response (4-5). The labelling requirement of “0g” trans fat under the proposed scheme is set at less than 0.3 gram trans fat out of 100 gram food product. It has been challenged by the traders with American background because they are aware that the technical standard in US is different (i.e. 0.5 gram trans fat per serving of food product). A stricter requirement would eventually prohibit the import of related food products with trans fat label. However, with reference to the technical standards set by various countries, the standard proposed by the Government is found to be justifiable. Canadian standard set at 0.2g trans fat per food serving (6). Australia & New Zealand have their standard even stricter. They require food products with no detectable trans fat before they can assert “0g” trans fat on the package (7). Given the fact that over consumption of trans fat is a risk factor of cardiovascular disease, adhering to the lowest technical standard of labelling requirement would certainly be



School of Public Health

2/F., School of Public Health
Prince of Wales Hospital
Shatin, N.T., Hong Kong
<http://www.sph.cuhk.edu.hk>

公共衛生學院
香港新界沙田威爾斯親王醫院
公共衛生學院二字樓
TEL 電話：(852) 2252 8488
FAX 傳真：(852) 2145 7489

beneficial to the general public. The SPH is thus supporting the Government to maintain to their original proposal on labelling requirement of trans fat.

Conclusion

From a public health perspective, the nutrition labelling scheme provides the gateway to general public to know what they are eating. In order to strive for maximum health gain out of this initiative, **we support no exemption being granted to small volume sales items with nutrition claim; and the maintenance the technical standard of “0g” trans fat to the original proposed definition i.e. less than 0.3 gram trans fat in 100 gram of food product.**

Yours sincerely

Professor Sian Griffiths, OBE
Director
School of Public Health



School of Public Health

2/F., School of Public Health

Prince of Wales Hospital

Shatin, N.T., Hong Kong

<http://www.sph.cuhk.edu.hk>

公共衛生學院

香港新界沙田威爾斯親王醫院

公共衛生學院二字樓

TEL 電話：(852) 2252 8488

FAX 傳真：(852) 2145 7489

References

1. US Food and Drug Administration. Consumer research on food labels. Internet: <http://vm.cfsan.fda.gov/~lrd/ab-label.html>
2. Levy AS, Fein SB, Schucker RE. Performance characteristics of seven nutrition label formats. *J Public Policy Market* 1996;15:1-15
3. Heimbach JT, Stokes RC. Nutritional labeling and public health: survey of American institute of nutrition members, food industry, and consumers. *Am J clin Nutr* 1982;36:700-8
4. Ascherio A, Katan MB, Stampfer MJ, Willett WC. Trans fatty acids and coronary heart disease. Sounding board. *N Engl J Med*. 1999;340:1994-7.
5. ASCN/AIN Task Force on Trans Fatty Acids. Position paper on trans fatty acids. *Am J Clin Nutr*. 1996;63:663-70
6. Canadian Food Inspection Agency. 2003 Guide to Food Labelling and Advertising. Internet: <http://www.inspection.gc.ca/english/fssa/labeti/guide/toce.shtml>
7. Food Standard Australia and New Zealand. Australia New Zealand Food Standards Code. Internet: <http://www.foodstandards.gov.au/thecode/foodstandardscode.cfm>