

Consumer Council's Views on the  
Food and Drugs (Composition and Labelling) (Amendment) Regulation 2004

Foreword

1. The Consumer Council welcomes the enactment of the Amendment Regulation. The Council believes that the newly-introduced labelling requirements will benefit consumers on one hand by facilitating informed choices of products , and will promote the goodwill of manufacturers/importers on the other hand by making product information transparent and user-friendly.
2. On the areas on improvement, the Council has the following views:

Labelling of Allergenic Substances

3. The Council welcomes the requirement of labelling allergenic substances which will enable consumers to avoid products containing substances that they may be allergic to.
4. The Council hopes that in due course the category of substances required to be declared will be expanded to include other allergenic substances that are available in common food products sold in HK such as honey, royal jelly and pollen grain products.

Labelling of Details of Food Additives Used

5. The Council supports the requirement of labelling details of food additives.
6. The Council suggests that the Government considers compiling a list of acceptable names, in both English and Chinese, so that consumers and the food industry have a clear standard to follow.
7. The Council is prepared to help educate consumers on the International Numbering System for Food Additive, if required.

Date Marking Format

8. The Council welcomes the flexibility to be allowed in the date marking format as

there will be no more ambiguity to consumers and unnecessary costs to importers can be avoided.

9. The Council suggests that the day-month-year sequence of the Arabic numerals be placed side-by-side with the numerals and should not be allowed to be printed far apart from each other on the package.

#### Labelling of Alcoholic Drinks

10. The Council welcomes the requirement of labelling the "best before" date of beers to safeguard against quality deterioration.

#### Additives in Condensed or Evaporated Milk and Butter

11. The Council agrees to the relaxation of additive restrictions regarding condensed or evaporated milk and butter. The Council believes that the adaptation of the Codex standard is adequate as only additives evaluated by JECFA as safe for human consumption will be allowed to be used in these products.