

**COMMENTS ON
THE LEGISLATIVE COUNCIL BRIEF
FOR
FOOD AND DRUGS (COMPOSITION AND
LABELLING) (AMENDMENT) REGULATION 2004
BY
THE HONG KONG FOOD SCIENCE AND
TECHNOLOGY ASSOCIATION LTD.**

Labelling of Allergenic Substances

Definitely, it is important and useful for citizens on understanding the potential risk of their food intake since food allergy is life threatening. A very small dose of the allergens could induce anaphylaxis (a violent reaction) to a sensitive individual. The list proposed has taken care of most common allergens, and HKFSTA support this Labelling of Allergenic Substances. However, this is indeed not that simple.

Items listed under each category

Of the eight categories, it is necessary to clearly clarify the items from both enforcement organization and policy authorities to food manufacturers, food trades and our citizens. In several categories, there are many different items under each category and each item would carry different format existing in food products. It is especially easy to be find on cereals containing gluten; crustacean and crustacean products; fish and fish products; and tree nuts and nut products.

Other Allergenic Substances

In addition, in the category list, we do not find honey and honey's products, pollen and pollen's products, bamboo shoots and garlic, which also cause allergy and could be found in Asia food. Therefore, we advise to consider other allergenic substances, which are generally believed as allergenic but not listed in the Codex.

Labelling of Details of Food Additives Used

HKFSTA agrees to implement Codex recommendations and adopted International Numbering System for Food Additives (INS) on labelling for food additives. This

method will help harmonization of world trade and enhance food trade. HKFSTA suggest both enforcement organization and policy authorities to support the “INS” to food manufacturers, food trades and our citizens. Category and the exact name format are highly preferred.

More Flexible Date Marking Format

HKFSTA so glad to see the proposed flexibility. We agree that the day, month or year should follow the exact date marking accordingly. It must be clearly declared in one of the following way, including Traditional Chinese, Simplified Chinese and English wordings, in addition to the Arabic numerals format:

Labelling of Alcoholic Drinks

HKFSTA agrees with the amendment proposed after consideration of Codex, Wine and Beer Industry. We recommend food labelling requirements for those exempted products should be listed voluntarily.

However, for those alcoholic drinks that carry allergenic substances, they should NOT be exempted and have to fulfill all statutory labelling requirement. This suggestion not only concurrent with the “Labelling of Allergenic Substances”, but also prevent citizens cause potential risk on their health due to such exemption.

Additives in Condensed or Evaporated Milk and Butter

HKFSTA welcomes the relaxation of the restriction by making reference to the Codex standard.

The Amendment Regulation

HKFSTA accepts this Amendment Regulation will come into operation on 9 July 2004. However, the grace period of 18 months may not be sufficient for most products with long shelf life, un-finished packaging and pre-printed labels. We recommend the grace period could be extending to 36 months.

We also accept the Relaxation on the Additives in milk products and butter to be implemented immediately.