



香港食品、飲料及雜貨協會

THE HONG KONG FOOD

DRINK & GROCERY ASSOCIATION

GPO BOX 8689, HONG KONG TEL: 2976 1138 FAX: 2976 1339

2 June 2004

Dr Hon LO Wing-lok, JP
Chairman
Subcommittee on Food and Drugs
Legislative Council
HKSAR

By fax (#2509 0775)

Dear Dr Lo

**Legislative Council
Subcommittee on Food and Drugs
(Composition and Labelling) (Amendment) Regulation 2004**

The FDGA has always been proactive in cooperating with the government regarding the potential improvements to be made to the benefit of Consumer health, and especially in terms of labelling and quality of our products. This is an approach we want to continue, and give responsible feedback and advice in regards to the Food and Drugs (Composition and Labelling) (Amendment) Regulation 2004.

It is extremely difficult for us to give a comprehensive and detailed response to the individual articles of the Amendment, given the tabling of this regulation with such short notice. Therefore we would like to focus only on the main areas of concerns for our industry.

Wine & other drinks with an alcoholic strength by volume of 10% or more

The proposed amendment removes the exemption for this category. This is totally new and unexpected versus previous discussions, and it is normally the practice of the government to have full consultations with relevant industry and trade bodies; we view this as a new law requiring major labelling changes to a category which did not have any in the past, causing severe implications for the industry.

This industry includes a large number of companies importing and distributing an extremely large number of products, especially for Wines (more than 300,000 products managed by the Custom & Excise Department!). Basically we believe that all labels would be affected, and would have to be modified according to the proposed Amendment. The main impact would be to reduce choice for the consumers (as numerous brands would choose not to comply for a *limited* market like Hong Kong) or / and increase the cost to them (labels produced and stickered locally).

=> We would urge that the Wines and Spirits > 10% would be removed from the Amendment as initially presented, and full consultation start between the Government and the Industry.

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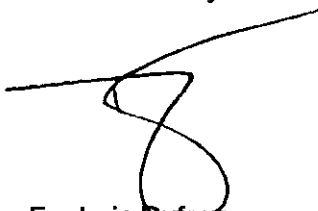
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Food

1. We are surprised that this Amendment which will require modifications of thousands of food labels, has been tabled without consideration being given to the timing of future nutritional labelling laws. Having 2 separate labelling initiatives being introduced at different points of time will duplicate cost, efforts and disrupt the business.
=> We would propose that the timing for implementation be coordinated with any future legislation on nutrition labelling, and in any case a minimum of 2 years grace period be granted.
2. Whereas we are supportive of the need to label additive, we would recommend that the information provided on the label is simplified by excluding the generic name such as "preservative", and just carrying the actual name of the preservative; indeed space on most products labels are very limited especially with dual language.
3. Regarding the labelling of allergens, this should not be an issue for products produced in countries where CODEX has been implemented, but we would have a major concern for products manufactured in China and Asia. The reason for this is that we can not be sure that they are 100% free of allergens as required in the proposed Amendment.
=> This is a major concern that needs to be addressed.

In summary the FDGA supports the principle of more information on labels to the benefit of consumers, however the implementation of this new legislation should take into consideration the various practical aspects raised in this paper.

Yours sincerely



Frederic Dufour
Chairman

FD/ml



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