



香港中華廠商聯合會
The Chinese Manufacturers' Association of Hong Kong
(一九三四年成立 Established in 1934)



June 3, 2004

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

Dear Dr Lo,

Re: Food and Drugs (Composition and Labelling) (Amendment) Regulation 2004

Thank you for inviting comments from the Association on the captioned. With regard to the proposed amendments on the existing composition and labelling legislation, the Association has the following comments :-

1. Labelling of Allergenic Substances

We support the proposed change in legislation. Substances that may cause allergy in some people and therefore harmful to them should be stated on the food labels. However, provided these have already been shown on labels from our major Source Countries, re-label should not be required.

2. Labelling of Food Additives Used

Provision of details of the additives used is more for consumer information than a health issue. Therefore, we are of the opinion that adoption of our major Source Countries' labelling practices by local food traders would be adequate for the labeling purpose to avoid re-labelling upon importation. Otherwise, stringent labeling requirements will only be disruptive and restrictive to both the trade and the consumers.

3. Date Marking Format

The Association welcomes the flexible arrangements as proposed in the legislation.

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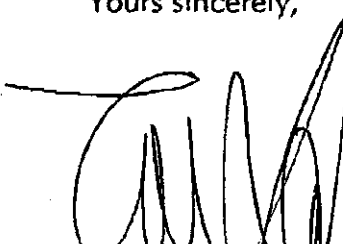
#### 4. Labelling of Alcoholic Drinks

Local production of wines and beers is limited and domestic consumption relies heavily on imported alcoholic drinks. Therefore, we have to carefully consider the existing labelling practices of our major Source Countries before we stipulate our own legislation. In this regard, we recommend that products in compliance with the labelling requirements of our major Source Countries should be adequate for labelling purpose.

#### 5. Inclusion of Additives in Condensed or Evaporated Milk and Butter

We appreciate the government in adopting the CODEX standard for inclusion of additives in milk and butter.

Yours sincerely,



Francis Lau  
Secretary - General