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22 April 2005

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Dear Mrs. Li,

**Legislative Council
Panel on Food Safety and Environmental Hygiene**

I refer to your letter of 18 April 2005. Please be informed that our Council discussed this matter at its monthly meeting last night and agreed to reiterate its views as stated in the submission sent to you on 29 January 2004. A copy of the document is attached herewith for your quick reference.

Since the Academy's views have already been presented by our Dr. CW Chan at Legco's special meeting back in February 2004, there will not be any representative attending the meeting on 10 May 2005 to present them again.

Thank you for your attention. Should you have any queries, please feel free to contact us at 2871 8888.

Yours sincerely,

Mr. Elmer Wan
General Secretary

Encl.

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29 January 2004

Dear Mrs. Li,

**HKAM's Views on the Administration's Proposal on
the Labelling Scheme on Nutrition Information**

Having studied the public consultation document on the labelling scheme on nutrition information, the Hong Kong Academy of Medicine would like to submit this summary of our views and suggestions for your panel's consideration.

The Academy supports in general the Administration's proposal to introduce a labelling scheme on nutrition information in packaged food with the aims: 1) to facilitate consumers to make healthy food choices; 2) to encourage food manufacturers to apply sound nutrition principles in the formulation of foods which would benefit public health; and 3) to regulate misleading or deceptive labels and claims.

Below are our comments on the consultation document in more details:

Paragraph 6.2 - Overall

We support all three points. The Academy would like to play an active role in establishing a set of local Nutrient Reference Values and tolerance limits.

Paragraph 6.6 - Coverage

We would like to seek clarification on why the proposed scheme would not be applicable to infant/follow-up formulae, foods for infants and young children, and other foods for special dietary uses. We think that these should be included under the scheme unless there are separate guidelines specific for them.



Paragraph 6.10 – True Representation of Content

We support the proposal of a set of 9 core nutrients plus energy for nutrition labelling. We emphasize that the labelled value should be a true representation of the exact content within a reasonable limit of error. However, we would also like to know how the Government would go about enforcing and monitoring this.

Paragraph 6.20 - Food Labelling of Iodine Content

According to some local studies, iodine deficient disorder is a common condition among the population in Hong Kong. We believe that labelling of food iodine content in addition to the present list is important and should help the public in obtaining the recommended daily iodine intake. We submit this suggestion in accordance to the phrase “of local public health significance” in paragraph 2.4.

Paragraph 6.23 - Claim

We strongly support the proposal that it be made mandatory the amount of any nutrient for which a claim is made.

Paragraph 6.25 - Nutrient Content Expression and Presentation

We believe that the labelling must be clear and easy to understand, particularly by laymen. The format should be standardized. A good example is the standard format used in the United States.

Energy should be expressed in a standardized unit which is commonly used and easily comprehensible by the general public. We suggest that we should use kilocalories (kcal).

Energy/nutrients should be expressed in absolute amount per 100g or 100 ml, per serving, and in terms of the percentage of NRV per serving. The preferred example is at the bottom of page 40.

Paragraph 6.38 - Nutrient Function Claim

Manufacturers must have solid scientific base and be able to provide sufficient information upon request by the vetting panel.

Paragraph 6.42 - Timeframe of Implementation

The timing of the implementation should be sped up. Once Phase I has commenced, the general public may take for granted that full implementation has already occurred and therefore may be misled by incomplete or erroneous labelling on products which have not yet been brought under control by the Phase II legislation.



In conclusion, the Academy believes that the community would only benefit from the implementation of the labelling scheme. Public health would improve as a consequence and the spending on health care could be decreased eventually. The industry would also benefit as the public's confidence on the products in the market improves.

Yours sincerely,

Elmer Wan (Mr.)
General Secretary