

**PARKNISHOP**

A division of A.S. Watson Group (HK) Limited  
 Watson House  
 1-5 Wo Liu Hang Road  
 Fo Tan, Shatin  
 New Territories, Hong Kong  
 Tel: (852) 2606 8833  
 Fax: (852) 2695 3664  
 www.parknishop.com

Dr. York Chow  
 Secretary for Health, Welfare & Food  
 Health, Welfare & Food Bureau  
 8/F, West Wing  
 Central Government Offices  
 Hong Kong

立法會 CB(2) 2484/04-05(01)號文件  
LC Paper No. CB(2) 2484/04-05(01)

19 August 2005

Dear Dr. Chow,

The Hong Kong SAR government intends to introduce mandatory nutritional labeling regulations for prepackaged food. This proposal as it stands will dramatically effect the range and cost of foods available to consumers and this is especially so for smaller selling items. There are also problems in attaching large stickers to packs without covering up any other mandatory or consumer information.

In order to minimize the negative impact of choice & price to consumers as well as making the scheme practical, we ask you to consider implementing the following within the regulations:

**1. Exempt small selling items**

Items that sell less than 100,000 per year should be exempt. These items do not represent a significant nutritional contribution to the diet of the majority of Hong Kong people and are usually targeted at ethnic groups. The cost of nutritional analysis is the same for selling say 10 packs of a product as it is for selling 1 million packs of the same product. The costs 'per pack' increases as volumes decrease. Likewise, the cost of printing stickers will increase on a per sticker basis the lower the volume.

The current proposed 9 nutritional items + energy will cost around HK\$7,800 per product and this together with the cost of stickers will have the following effect (does not include labour):

Number of packs	100	1000	10000	100000
Cost of Nutritional analysis (HK\$)	7800	7800	7800	7800
Analysis cost per pack	78.0	7.80	0.78	0.07
Cost of printing stickers (HK\$)	180	250	1200	7000
Sticker cost per pack (HK\$)	1.80	0.25	0.12	0.07
Additional Cost per pack (HK\$)	79.8	8.05	0.90	0.14
HK\$10 pack of biscuits	89.8 (+798%)	18.05 (+80%)	10.9 (+9%)	10.14 +(1.4%)



Therefore the added cost to high volume items will be small, but for lower volume items the added cost will be high making it often not economically feasible and depriving many people, especially minorities from being able to purchase their chosen items.

The costs are the same irrespective of price of product

## **2. Small pack exemptions**

The exemption for small selling items with an aggregated surface area of <100cm<sup>2</sup> should be increased to <200cm<sup>2</sup>. This is because other mandatory labeling requirements and important consumer information is located at various different points on the pack making the nutritional label stickering of many products >100 impossible without committing an additional offence.

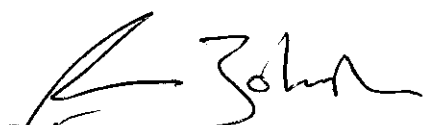
Labelling by 'tagging' is not practical as tags tend to fall off during handling.

## **3. Permit 'per serving'**

Apart from permitting the nutritional content to be labelled 'per 100g' it should also be permitted to be labelled 'per serving' provided the serving size is stated. 'Per serving' is permitted in the USA and it is easy to convert to 'per 100g' if the consumer so wish.

Incorporating the above into the regulations will promote a 'win-win' for both consumers and the trade.

Yours Sincerely,



Peter Johnston  
Quality Assurance Manager  
Chartered Scientist  
Fellow of the institute of Food Science & Technology (UK)

Copy:

Legco Food Safety and Environmental Hygiene Panel Members:

Hon Fred Li Wah Ming, JP  
Hon Wong Yung Kan, JP  
Hon Bernard Chan, JP  
Hon Andrew Cheng Kar Foo  
Hon Tam Yiu Chung, JP

Hon Vincent Fang Kang, JP  
Hon Wong Kwok Hing, MH  
Dr. Hon Joseph Lee Kok Long  
Dr. Hon Kwok Ka Ki  
Hon Tommy Cheung Yu Yan, JP