

**HONG KONG RETAIL MANAGEMENT ASSOCIATION****香港零售管理協會**

9 June 2006

Dr York Chow, SBS  
Secretary for Health, Welfare and Food  
19/F, Murray Bldg  
Garden Road  
Central  
Hong Kong

立法會 CB(2) 2369/05-06(02)號文件  
LC Paper No. CB(2) 2369/05-06(02)

Dear Dr Chow

**Guidelines on Voluntary Labelling of Genetically Modified Foods**

We refer to the fifth meeting of the working group on the voluntary labelling of genetically modified (GM) food held on 23<sup>rd</sup> May 2006.

On behalf of the Hong Kong Retail Management Association, I write in support of the government's proposal to issue voluntary GM labelling guidelines to the food trade.

***No health risk but consumer choice***

We agree with the Government, and with supporting international research, that GM foods do not pose a health risk. We do recognise that there is growing consumer expectation for GM labelling. Where practicable, we agree that consumers should be provided with more product information.

***Hong Kong as food importer***

Hong Kong imports approximately 90% of its food from different parts of the World. Many grocery products sold in Hong Kong originate from USA and South East Asian countries where food products containing GM ingredients are currently not labelled. Also, in many countries, such as China, Korea, Taiwan and Japan, only designated food products containing GM materials are required to be labelled.

***Consistency with trading partners***

It is important that Hong Kong's labelling guidelines are consistent with its major trading partners. If Hong Kong has stricter labelling guidelines than its trading partners, this would be detrimental to consumers as it would lead to:

- (a) a restricted choice of products in Hong Kong (because overseas manufacturers would not be willing to export products to Hong Kong because additional costs would outweigh the benefits in such a competitive market); and

**(b) an increase in the price of products (resulting from the compliance costs of testing and re-labelling).**

***Voluntary Guidelines***

The draft guidelines are currently the best solution for Hong Kong given its reliance on food imports and the current global situation regarding GM food labelling.

We note that the guidelines are applicable only to prepackaged food that contains food or food ingredients that are known to have a GM counterpart. In this regard, we would be grateful if the Government could issue, and keep updated, a list of food or food ingredients that are known to have a GM counterpart.

**We strongly believe that the guidelines should be voluntary until such time that internationally agreed standards and norms are established, and our major trading partners are in accord.**

***HKRMA support***

Lastly, we confirm that we will strongly encourage members of the HKRMA to implement the guidelines on voluntary labelling of GM food where it is possible and practical for them to do so.

Yours sincerely,



Anita Bagaman (Miss)  
Executive Director

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Legco Food Safety & Environmental Hygiene Panel Members  
Mr Yu Pang Chun, Convener Retail Task Force  
Mr David Hooi, Secretary, Business Facilitation Advisory Committee