



TO: Director of Food and Environmental Hygiene Department

RE: Subcommittee on Food and Drugs (Composition and Labelling)  
(Amendment: Requirement for Nutrition Labelling and Nutrition Claim)  
Regulation 2008

**Hong Kong Dietitians Association (HKDA) &  
Hong Kong Nutrition Association (HKNA)  
Position Statement**

A comprehensive nutrition labeling scheme is an important tool for improving public understanding on the nutrition of pre-packaged foods and have better food choices as part of their healthy diet. HKDA and HKNA strongly supported that the mandatory food labeling scheme will come into force on July 1, 2010. However, we notice some major food labelling concerns that might be overlooked by the government. Therefore, we have conducted a survey on “Consumers’ View on the Revised Food Labelling Scheme” (Appendix I) in mid-April 2008.

**1. To present the survey report on “Consumers’ View on the Revised Food Labelling Scheme”**

**Highlight of the Survey**

A total of 597 completed surveys are collected from the public. We found that 91.6 % of consumers will be convinced by nutrition claims resulting in purchasing the products; 37.7 % of consumers think “less sweet” product is a healthier choice or do not know what “less sweet” means; 77.6 % of consumers agreed that the government should regulate products with claims based on “taste” such as “less sweet”, “less salty” or “less oily”; 93% of the consumers supported that manufacturer to put “suggested serving size” on the food labels.

**1. Consumers are immensely convinced by nutrition claims on food products which will affect their food choices.**

- We reinforce that the government to closely regulate all products with nutrition claim. All products with nutrition claims should have food labels that comply with the food labelling regulations of Hong Kong. According to the survey (Appendix II) done in November 2007, we nutrition professionals remain our stand that the government shall not apply exemption for products in small volume with or without nutrition claims.

**2. Consumers are misled by claims based on “taste”; and they strongly supported that the government should regulate products with claims based on “taste”.**

- We suggest that any nutrition claims based on “taste” (E.g. “less sweet (少甜)”, “less salty (少鹹)”, “less oily (少油膩)” or “lightly tasted (清淡味), etc) shall be regulated under nutrient content claim, instead of no regulation at all.
- The regulation of nutrition claims based on “taste” will further prevent exploitation of any deceitful marketing skills. It will further reinforce manufacturer to improve or create “real” healthier products for consumer choices.

**3. Consumers also express that a “suggested serving size” on food labels shall be stated.**

- Absence of a “suggested serving size” on food labels, especially those products with only per 100g or per 100 ml food listed, might lead to over- or under-consumption of foods in turn might be detrimental to consumer’s health.
- For example:
  - i. Over-consumption of a low fat and/or no sugar products might lead to obesity.
  - ii. Over-consumption of low sodium products such as low sodium salt might lead to hypertension or used excessively by the public or people with chronic diseases.
  - iii. Under- consumption of calcium from milk can increase risk to osteoporosis.
- Therefore, we strongly request that the government make “suggested serving size” a mandatory item on food labeling, especially for those products with only per 100g or 100ml food listed, which helps consumers understand and

control their food portion size, in achieving a healthy balanced diet to maintain a healthy weight and also prevention of chronic diseases.

4. **We suggest the government to closely monitor the food labelling scheme after implementation.**

- Setting up a complaint system (e.g. address for complaint letter, hotline and email etc.) and announcing to the public that they can utilize this system when any misled or deceit food labellings are found in the market will be useful.
- Any misleading and untruthful products found shall be penalized and prohibited to be imported to Hong Kong. This could further reinforce the manufacturers/ suppliers/ importers to adhere to the Hong Kong food labelling regulations.

Presented by:

Sylvia S.W. Lam  
Chairman of Hong Kong Dietitians Association

Rhoda Ng  
Secretary of Hong Kong Nutrition Association

Appendix I.

香港營養師協會 - 有關消費者對『營養資料標籤制度』問卷調查

A. 就香港政府為預先包裝食物新訂立的營養資料標籤制度，請協助回答以下問題：

1. 當你購買預先包裝食物時看見包裝上有例如「少糖」、「低脂」、「高纖維」、「高鈣」等營養聲稱，會否較吸引你去購買？  
 多數會       有時會       不會
2. 你認為食物上標明「少甜」是否等同健康的選擇？  
 是       否       不知道
3. 你認為香港政府是否應該立法管制以「味覺」作健康聲稱的產品（例如「少甜」、「少鹹」、「少肥」等）？  
 應該       不應該
4. 你認為食品標籤上是否應該例明「建議食用份量 (Suggested Serving Size)」(例如：1包、10粒、5塊、1杯等)？  
 應該       不應該
5. 你認為食品標籤上是否應該例明「膽固醇 (Cholesterol)」的含量？  
 應該       不應該
6. 你認為食品標籤上是否應該例明「膳食纖維 (Dietary Fiber)」的含量？  
 應該       不應該
7. 你認為食品標籤上是否應該例明「鈣質 (Calcium)」的含量？  
 應該       不應該
8. 你每星期食用預先包裝食物多少次？  
 0次       1-5次  
 6-10次       10次或以上

B. 個人資料 - 請提供以下資料:

1. 你是否長期病患者 (例如糖尿病、心臟病、血壓高、痛風症等)?

是       否

2. 你的年齡:

20 歲以下       21 - 40 歲       41 - 60 歲       60 歲以上

3. 你的教育程度:

小學程度或以下       中學程度

大專/大學程度       大專/大學程度以上

----- 多謝 ! -----

## Appendix II.

### **Hong Kong Dietitians Association & Hong Kong Nutrition Association**

#### **Survey Report on the Revised Nutrition Labelling Scheme of Hong Kong**

**(Date: 22/11/2007)**

#### **Summary:**

The Hong Kong Nutrition Labelling Scheme which was first proposed in 2004 is currently under revision by the Food and Environmental Health Department (FEHD) and the Hong Kong government. And it will soon be submitted to the Legislative Council for final ruling at early 2008. The Hong Kong Dietitians Association (HKDA) and Hong Kong Nutrition Association (HKNA) deeply concern that the revised scheme with an abbreviated nutrient list (E (energy) + 6 core nutrients) will affect consumers' right to understand nutrition content of packaged foods in Hong Kong. Besides, there are other controversial debates among our profession on energy/nutrient expression, nutrient content claims, requirement of % Nutrient Reference Value (%NRV), food exemptions and appropriate timeframe of implementing the mandatory scheme. Therefore, we have implemented a survey in mid-November 2007 among nutrition professionals to obtain some collective standpoints.

Completed surveys were successfully collected from 73 nutrition professionals to obtaining collective standpoints. The following results are released on a press conference on 22<sup>nd</sup> November, 2007.

- Food portion should be expressed in both “per serving” and “per 100g”.The advantages of both expressions can compensate each others' functional shortages.
- Supports to keep the E + 9 nutrients scheme. Listing dietary cholesterol, calcium and dietary fiber help improve public's health.
- Trans fat should be mandatory and “trans fat” (70%) claims with legal definition are also strongly supported. Mandatory listing of trans fat can improve heart health of the public.
- Strongly suggests “Low sugar” claim with legal definition.
- Should not apply exemption for products in “small demand”.
- % NRV can be optional.
- Strongly urge the government to implement the scheme with no hesitation based on consumers' right on nutrition knowledge and also to improve the health of the public as soon as possible.