

16 May, 2008

Subcommittee on Food and Drugs (Compostion and Labelling)

Requirements for Nutrition Labelling and Nutrition Claim – regulation 2008

Additional comments to previous submission on food labelling:

1. We like to stress again that the full disclosure of nutrient information on nutrient content of food is of vital importance to consumer right and protection, especially to **small volume foods with claims**. To ease compliance to the labeling requirement, we like to suggest a sticker with detailed nutrient information can be attached to these products, if the original package labeling does not meet the present proposed labeling law of Hong Kong. A sticker with a ‘warning’ in replacement for nutrition information is not an acceptable alternative. It is to our understanding that NOT ONLY food analysis cost is inexpensive, but the fact is, most reputable manufacturers (especially from countries like the United States), have to do nutrient analysis before the printing of the food nutrient table, so data should be easily available from the manufacturers. If information on the claimed nutrient cannot be obtained from the manufacturer or importer, then the product should be considered unsafe or unacceptable to the people of Hong Kong. It is an irresponsible act that the manufacturer or importer consider a “warning label sticker” is feasible, but becomes “too costly” to stick a nutrient analysis label to the product that would comply with the laws of Hong Kong.

2. trans fat content of the food should be specified.

It is of special importance for nutrients related to fat quantity and fat quality, since it is related to coronary heart disease, the second killer disease in Hong Kong. For example, specific level of trans fat should be provided if the nutrient table listed ‘0g trans fat’. It is important that consumer understand that 0g trans fat does not mean 0g, but is possibly a 0.4g trans fat in some countries. As mentioned, information for exact quantity of trans fat (PLUS other nutrients) could be obtained from manufacturer, and put on a sticker label if not present in original packaging.

It is our position that a warning labels is not an acceptable alternative for proper food labels in the public interest. Countries like Finland have shown that the education of the population in quality and quantity of dietary fat has led to significant improvements in coronary disease. A warning label on a “small volume foods with claims” simply shows that the government wants to get rid of its own responsibility for public health protection, knowing quite well that the Hong Kong government WILL bear the burden of the disease if not acted appropriately. Individuals have suffered finacially and physically from the ‘modernization’ of food supply, especially in fat quality and quantity of food products. It is time that the business sector shows its part for community wellness and informed marketing, and accept a certain degree of extra work or inconvenience in its daily operation.

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