



From: The Hong Kong Health Food Association
To: All Members of the Hong Kong Legislative Council

Dear Honorable Legislative Council Members,

Final Submission of the Hong Kong Health Food Association on the Nutrition Information Regulation to the Legco

Although the Nutrition Information Regulation is about to pass, the Hong Kong Health Food Association (HKHFA) persistently reiterates and insists that health food supplement should not be regulated by the extant food laws because the current laws are not suitable and not proper enough for health food supplement. There should be a special piece of subsidiary legislation under the food laws appropriately drafted for the health food products.

Addition of A New Category

The basic concept is to have an intermediate category between the food and drug categories. That intermediate category is health food supplement. While individual territory/country may have different terminology to describe the category, they all mean the same in a broad sense. The intermediate category is well established around the world. The HKHFA has chosen to use the term “保健食品”, which is formally recognized by the government of both China and Taiwan.

The fundamental difference of health food supplement from food and drug is that food supplies macro-nutrition to the human body; health food supplement delivers health benefits, and drug product provides treatment for diseases. The characteristics of health food supplement are (1) health food supplement does not contain nutrition value such as proteins, carbohydrates and fats; (2) it must have recommendation on the amount and frequency of daily intake; (3) it is usually presented in capsule or tablet form; (4) it must not contain any ingredients that can treat diseases; (5) it must be safe and harmless for human consumption.

Alternative to Enhance Health Protection

Diseases, especially chronic diseases, usually develop gradually & silently from a healthy phase to the disease phase over a long period of time. During this latency period, one has to take suitable measures so as to prevent the deterioration of one's health as soon as possible. Ideally, one can follow closely the recommendations advocated by the Department of Health, which include balanced diet and sufficient physical exercise. But, according to the survey data published by the Central Health Education Unit of Department of Health in July 2005, only 9 out of 171 participants in the 24 focus groups had achieved the DOH's recommended level of consumption, at least 2 servings of fruits and 3 servings of vegetables per day. Secondary school students and the working adults are the groups that exhibited low compliance to the recommended diet and sufficient exercise.

To the low compliance groups, probably commanding the majority population, what alternative health preventive measures are available? In many foreign countries where health food is popular, working adults can freely and wisely purchase health food products that can help to safeguard their own health. A typical example is fish oil or Omega-3 products. The US National Institutes of Health lists three conditions for which fish oil and other omega-3 sources are most highly recommended: hypertriglyceridemia, secondary cardiovascular disease prevention and high blood pressure.

U.S. Dietary Supplement and Healthcare Cost

In U.S., the National Institute of Health has awarded funds to research institutes on a regular basis to conduct scientific studies on health food ingredients. In 2002, the American Heart Association, using Federal survey data, estimated that 13 million of Americans suffer from Coronary Heart Disease (CHD). In view of the mounting costs in treating the disease, the USFDA recognized the efficacy of mega-3 fatty acids in dietary supplements for preventing CHD by issuing a qualified health claim. The Lewin Group estimates potential five-year (2006-2010) savings in health care expenditure of US\$3.1 billion resulting from a reduction of CHD among the over age 65 population by daily intake of 1,800 mg of Omega-3. The Group also estimates five-year (2005-2009) net savings in hospital, nursing facility, and physician expenditures of US\$13.9 billion resulting from a reduction in hip fractures among those over age 65, through daily intake of supplements of 1,200 mg Calcium with vitamin D.

The Centre for Food Safety in Hong Kong has also quoted some healthcare cost reduction examples in their web page. Please refer to the following quotation:

“Overseas experiences have shown that nutrition labeling can have positive impact on food consumption pattern, save healthcare costs and human lives. For example:-

- U.S. - the cost-benefit study commissioned by the Food and Drugs Agency estimated that the saving in health care cost associated with the reduction in risk of cancer and coronary heart disease ranged from US\$ 4400 million to 26000 million;
- In Canada - the Agriculture and Agri-Food Canada and Health Canada calculated that the reductions in the direct and indirect costs related to the reduced risks of cancer, diabetes, coronary heart disease and stroke would be about CAD 5 billion over 20 years;
- In Australia and New Zealand - the health care cost associated with high blood pressure, high blood cholesterol, obesity and type 2 diabetes ranges between 32 million and 42 million each year. It is also estimated that 320 to 460 lives could be saved each year with the introduction of mandatory nutrition labeling.”

Conclusion

For the sake of enhancing preventive healthcare, the government should consider recognizing the role of scientific based health food supplement (dietary supplement/health supplement) in the primary health care system in Hong Kong and recognize health food supplement as one of the options in promoting preventive care as well as an integral element in the health care reform.

Yours respectfully,

The Hong Kong Health Food Association
26 May 2008