For discussion
on 8 July 2008

LegCo Panel on Food Safety and Environmental Hygiene

Evaluation on the Effectiveness of the Guidelines on Voluntary Labelling of Genetically Modified Food

PURPOSE

This paper presents to Members the findings from the evaluation exercise conducted to assess the effectiveness of the "Guidelines on Voluntary Labelling of Genetically Modified Food" (the Guidelines), and proposes the way forward.

BACKGROUND

2. Genetically modified (GM) food is any food or food ingredient that is, or is derived from, an organism in which the genetic material has been modified using modern biotechnology. According to the World Health Organization, GM foods currently traded on the international market are not likely, nor have been shown, to present risks for human health. On the other hand, there are studies which highlight the uncertainty involved in the long-term effect of GM food on human health.

3. The approaches adopted for GM food labelling vary to a great extent among different countries and areas. The main reason is that individual country or region formulates its policy and system based on its own situation. Apart from food safety and consumers' right to information, other factors are also taken into account, including protection of local agricultural market, economy and trade, conservation of ecological environment and beliefs of their citizens. Compared with other countries and areas, Hong Kong has been adopting a free trade policy and is not an important agriculture producing area. In drawing up food regulatory measures, we are primarily concerned with public health and food safety.

4. The Administration conducted a public consultation on GM food labelling in 2001 and a regulatory impact assessment (RIA) in April 2002. Difficulties were identified in the RIA on the implementation of a mandatory GM food labelling scheme in Hong Kong, e.g. operational cost increases to the trade with a greater impact on the small and medium-sized enterprises and the lack of international consensus on GM food labelling. In order to promote consumers' access to information while minimizing any impact on consumers' food choices and on trade operation, the Administration worked with the trade to introduce a voluntary GM food labelling scheme in 2006. The Guidelines issued in July 2006 is at **Annex 1**, and the recommended practices are summarized as follows -

(a) To label food items with 5% or more GM materials in their food ingredients as "genetically modified" (positive labels);
(b) To provide additional information on the label if the GM food concerned has undergone significant modifications in specific aspect (e.g. animal gene introduced into food of plant origin); and
(c) Not to use negative labels in absolute term (e.g. "GM free") and to use other forms of negative labels only when the declaration is substantiated by documentation.

OBJECTIVES

5. An evaluation has been conducted to assess the effectiveness of the voluntary labelling scheme, and its objectives are -

(a) To assess the awareness among food traders of the Guidelines;
(b) To acquire a better understanding of the attitude of the trade towards adopting GM food labels;
(c) To assess the use of GM material in food and the adoption of positive labels on food containing 5% or more GM material; and
(d) To assess the use and truthfulness of negative labels.

6. The evaluation is divided in three parts employing different methodologies (i.e. questionnaire, market survey and laboratory verification) to assess the various aspects set out in paragraph 5. The findings of the evaluation are detailed in the Evaluation Report at **Annex 2**.

MAJOR FINDINGS AND OBSERVATIONS

Questionnaire: Awareness and Attitude

7. About one and a half years after its introduction, over 60% of the respondents were aware of the Guidelines. While a fair proportion of the traders surveyed were aware of the Guidelines, further promotion, especially among small-sized companies, is needed.

8. Questionnaires returned by the trade indicated that the absence of legal requirements, increase in production cost, and limited knowledge of GM food labelling, were generally the main reasons for traders not to adopt the labelling regime. The results showed that more in-depth promotion of the Guidelines and education to the trade should be able to bring in more traders under the voluntary labelling scheme and shed some light on the future publicity strategy.

Market Survey: Use of GM Food Labels

9. A market survey covering over 1 200 prepackaged food products revealed that labels on GM status were present only on food that contained ingredients with GM counterparts[1]. All the samples indicating GM status, a total number of 14, carried negative labels and among those traders with sufficient contact information, all of the negative labels were substantiated by documentation. It was also worth noting that among the samples subject to laboratory testing, all of the samples bearing negative labels did not contain any detectable GM material or specific GM events. It is encouraging to see that majority of the negative labels are backed up by documentary proof, as recommended in the Guidelines, although absolute terms are used in a small number of the samples. While the use of negative labels, in particular those in absolute terms, is not recommended in the Guidelines in order to avoid abuse, the findings indicated that negative GM labels on the market were in general truthful and substantiated. Negative labels used in such manner could be considered as a form of information useful to consumers.

[1] Genetic modification has only been used to develop GM varieties of certain crops such as corn, soya bean, canola, tomato, etc. A corresponding GM variety therefore may not exist for all crops.

Laboratory Testing: Presence of GM Material and Accuracy of GM Food Labels

10. 46 samples of prepackaged food containing crops with GM counterparts most commonly used in food (i.e. corn and soya bean) were tested for GM content. Only one sample was found to contain more than 5% of GM material, and there was no GM food label on the food sample concerned. The figures indicated that food products containing GM materials above the labelling threshold (5%) were not prevalent among the samples tested. Since only one sample required labelling according to the Guidelines, no meaningful conclusion could be drawn on the use of positive labels.

WAY FORWARD

11. The findings from the evaluation exercise illustrated that there was no pressing need for mandatory labelling, as measured by the level of use of GM material in the samples. As the potential benefits that could be brought about by the Guidelines have not been fully realised, taking into account the level of awareness of the respondents and the respondents' concern over their limited knowledge in the area, there is a must for us to continue our efforts in promoting the voluntary labelling regime.

12. The lack of international standard has also been one of the most important difficulties in establishing a mandatory labelling scheme for GM food, and there have been no major development at the international level, notably by the Codex Alimentarius Commission, in the past two years. The Administration will keep in view the international development in GM technology and GM food labelling standards, in deciding on the future course of action.

13. It is worth noting that as a major step to promote consumers' access to food product information, the Administration has recently introduced the new legislation requiring labelling of nutrition information, which will commence operation in July 2010. With this new piece of legislation just enacted, it is in the interest of the consumers and the trade to observe the impact of the new requirements before introducing any further change to the labelling law.

ADVICE SOUGHT

14. Members are invited to note the findings from the evaluation exercise and comment on the proposed way forward.

Food and Health Bureau

Centre for Food Safety
Food and Environmental Hygiene Department

July 2008

Annex 1

GUIDELINES ON VOLUNTARY LABELLING OF GENETICALLY MODIFIED (GM) FOOD

PURPOSE

The Guidelines on Voluntary Labelling of GM Food (the Guidelines) set out the principles underlying the recommended labelling approaches for GM food, and provide reference for the trade to make truthful and informative labels in a consumer-friendly manner.

BACKGROUND

2. The international community is working towards a consensual system on GM food labelling. However, there is no consensus on GM food labelling in the Codex Alimentarius Commission (Codex) and it is unlikely that internationally agreed standards can be established in the near future. Nevertheless, a number of countries have introduced their own labelling requirements on GM food. In order to enhance consumers' knowledge and right to make an informed choice on GM food, the Centre for Food Safety (CFS) supports the local food trade's initiative in setting up a voluntary labelling system for GM food. A Working Group comprising representatives from the food trade, the Consumer Council and the relevant Government departments was set up by the Food and Environmental Hygiene Department (subsequently taken up by the Centre for Food Safety (CFS)) to formulate the Guidelines.

3. The Guidelines are advisory in nature and members of the trade are encouraged to adopt the Guidelines which have been jointly developed by representatives of the trade, consumer bodies and government departments. Members of the trade are reminded that they should not falsely describe their food products, which section 61 of the Public Health and Municipal Services Ordinance (Cap 132) will apply. [An extract of this section is attached at Appendix.] The guidelines will be updated as and when necessary to reflect changes in technology and the international developments of GM food labelling requirement.

BASIC PRINCIPLES

4. The Guidelines embody the following basic principles:

5. **Principle 1:** The Public Health and Municipal Services Ordinance (Cap. 132) provides the legislative framework for food safety control in Hong Kong. As stipulated in section 61, no person shall give any food sold by him or display with any food exposed for sale by him, a label, which falsely describes the food. In addition, the Food and Drugs (Composition and Labelling) Regulations require that any prepackaged food shall be marked and labelled in the prescribed manner.

6. **Principle 2:** The threshold level currently applied in the Guidelines for labelling purpose is 5%, in respect of individual food ingredient, taking account of adventitious mixing of GM and non-GM crops during harvest, transportation, processing and storage. This threshold level reflects a more pragmatic and realistic level that the trade can achieve at this stage.

7. **Principle 3:** Additional declaration on the food label is recommended when significant modifications have taken place under the following conditions –

(a) the composition or nutritional value is significantly different from that of its conventional counterpart;
(b) the level of anti-nutritional factors or natural toxicants is significantly different from that in its conventional counterpart;
(c) the presence of an allergen that is not found in its conventional counterpart;
(d) the intended use of the food is significantly different from that of its conventional counterpart; or
(e) an animal gene has been introduced into food of plant origin.

8. **Principle 4:** Negative labelling is not recommended for food without GM counterparts, as it would be misleading to consumers.

SCOPE

9. The Guidelines are applicable to prepackaged food that contains food or food ingredients that are known to have a GM counterpart.[1]

[1] Negative labelling is not recommended for food of which no GM varieties have been produced, as it would be misleading to consumers.

DETAILED GUIDELINES

Interpretation

10. The following definitions are applicable to the Guidelines.

"genetically modified (GM) food"（基因改造食物） refers to any food or food ingredient that is, or is derived from, an organism in which the genetic material has been modified using modern biotechnology;

"GM free"（不含基因改造成分） refers to any food ingredients absolutely free (i.e. zero) of GM materials;

"genetically modified organism (GMO)" （基因改造生物） means any organism in which the genetic material has been modified using modern biotechnology;

"ingredient"（配料）means any substance, including any additive and any constituent of a compound ingredient, which is used in the manufacture or preparation of a food and which is still present in the finished product, even if in altered form;

"labelling"（標籤、加上標籤）, in relation to a food, includes any words, particulars, trade mark, brand name, pictorial matter or symbol relating to the food and appearing on the packaging of the food or on any document, notice, label, ring or collar accompanying the food;

"modern biotechnology" （現代生物科技） refers to the application of the following techniques that overcome natural physiological reproductive or recombination barriers and that are not used in traditional breeding and selection:

(i) *in vitro* nucleic acid techniques, including but not limited to recombinant deoxyribonucleic acid (DNA) and direct injection of nucleic acid into cells or organelles, or
(ii) fusion of cells beyond the taxonomic family;

"prepackaged food"（預先包裝食物） means any food packaged, whether completely or partially, in such a way that –

(a) the contents cannot be altered without opening or changing the packaging; and

(b) the food is ready for presentation to the ultimate consumer or a catering establishment as a single food item.

Positive Labelling

11. Any food items2 with 5% or more GM materials in their respective food ingredient(s) should be labelled as "genetically modified" in parenthesis following the name of the food/food ingredient in the list of ingredients. Alternatively, the words "genetically modified" may appear in a prominently display footnote to the list of ingredients, whereas the ingredient concerned would be marked with an asterisk "*". However, the font size of the footnote should be at least the same size as the list of ingredients. Examples are,

For whole food or food with single ingredient [3]:

List of Ingredients: soya beans (genetically modified)
配料表：大豆（基因改造）

For processed food:
List of Ingredients: flour, soya flour (genetically modified), water, sugar, butter, and walnut
配料表：麵粉，大豆粉（基因改造），水，糖，牛油，合桃
or
List of Ingredients: flour, soya flour*, water, sugar, butter, and walnut
*genetically modified
配料表：麵粉，大豆粉*，水，糖，牛油，合桃
*基因改造

Note:
If both the English and Chinese Languages are used in the labelling of prepackaged food, the name of the food and the list of ingredients shall appear in both languages.

[2] Paragraph 11 does not apply to food products, which do not contain detectable DNA or protein, including highly refined food (such as sugar and oil) and highly processed food, unless the food products have significant modification that have taken place under the conditions as stated in paragraph 12.
[3] Schedule 4 of the Food and Drugs (Composition and Labelling) Regulations exempts any food consisting of a single ingredient to comply with the labelling requirements imposed under paragraph 2 of Schedule 3 to the Regulations. However, paragraph 3 of Schedule 3 provides that if any prepackaged food which is exempted from paragraph 2 of Schedule 3 is marked or labelled with a list of ingredients on its own initiative (regardless whether the ingredients include the GM food), such list of labelling shall comply with the labelling requirements imposed under Schedule 3.

12. For any GM food with significant modifications that have taken place under the following conditions –

(a) the composition or nutritional value is significantly different from that of its conventional counterpart;
(b) the level of anti-nutritional factors or natural toxicants is significantly different from that in its conventional counterpart;
(c) the presence of an allergen that is not found in its conventional counterpart;
(d) the intended use of the food is significantly different from that of its conventional counterpart; or
(e) an animal gene has been introduced into food of plant origin,

the label should provide additional words in conjunction with the name of the food or food ingredients to inform consumers the changed characteristics. For example, product containing soya bean that is genetically modified to contain high oleic acid as an ingredient, the ingredient should be labelled as "soya bean (genetically modified to contain high oleic acid)".

13. If any GM food and their products of plant origin contain animal gene, additional information regarding the origin of animal gene[4] following the name of food ingredient is recommended. For example, a GM food "xx" with gene from animal "A" can be labelled as:

List of Ingredients: water, sugar, xx (genetically modified, contains gene(s) from A)
配料表：水，糖，xx (基因改造，含有來自 A 的基因)

Negative Labelling

14. "GM free" and similar labels (e.g. GMO free, free from GM ingredients, etc.) will give consumers the impression that the food products so labelled are totally free of GM content. Since there is the possibility of unintentional mixing of GM and non-GM crops, a truly "GM free" status is very difficult to attain. Such absolute terms may therefore be misleading to consumers and are not recommended to be used.

15. Should the trade wish to apply negative labelling other than "GM free" and similar labels to any food ingredients derived from

[4] No GM crops available in the international market at present contain any animal genes.

non-GM sources (which contains less than 5% of GM content), the trade should ensure that there should be documentation to substantiate such declaration. The trade is also reminded to comply with the provisions laid down in Section 61 of the Public Health and Municipal Services Ordinance (Cap 132).

16. In addition, any such negative labelling is not recommended to indicate or imply that a certain food, as a whole, is from non-GM sources, unless all of the concerned ingredients in the product are derived from non-GM sources and have fulfilled the requirement stated in para. 15.

EFFECTIVE DATE

17. The Guidelines will come into operation on 28 July 2006.

Centre for Food Safety
Food and Environmental Hygiene Department
28 July 2006

CHAPTER 132
PUBLIC HEALTH AND MUNICIPAL SERVICES ORDINANCE

Section 61 - False Labelling and Advertisement of Food or Drugs

(1) If any person gives with any food or drug sold by him, or displays with any food or drug exposed for sale by him, a label, whether or not the same is attached to or printed on the wrapper or container, which –

(a) falsely describes the food or drug; or

(b) is calculated to mislead as to its nature, substance or quality,

he shall be guilty of an offence, unless he proves that he did not know, and could not with reasonable diligence have ascertained, that the label was of such a character as aforesaid.

(2) Subject to the provisions of subsection (3), if any person publishes, or is partly to the publication of, an advertisement, other than a label to which the provisions of subsection (1) apply which –

(a) falsely describes any food or drug; or

(b) is likely to mislead as to the nature, substance or quality of any food or drug,

he shall be guilty of an offence, and, in any proceedings against the manufacturer, producer or importer of the food or drug, it shall rest on the defendant to prove that he did not publish, and was not a party to the publication of, the advertisement.

(3) In any proceedings for an offence under subsection (2), it shall be a defence for the defendant to prove either –

(a) that he did not know, and could not with reasonable diligence have ascertained, that the advertisement was of such a character as is described in that subsection; or

(b) that, being a person whose business it is to publish, or arrange for the publication of, advertisements, he received the advertisement in the ordinary course of business.

(4) For the purposes of this section, a label or advertisement which is calculated to mislead as to the nutritional or dietary value of any food is calculated to mislead as to the quality of the food.

(5) In any proceedings under this section, the fact that a label or advertisement in respect of which the offence is alleged to have been committed contained an accurate statement of the composition of the food or drug shall not preclude the court from finding that the offence was committed.

(6) In this section, save in so far as it relates to drugs, references to sale shall be construed as references to sale for human consumption.

Annex 2

Evaluation Report on the Effectiveness of the Guidelines on Voluntary Labelling of Genetically Modified Food

BACKGROUND

In view of the lack of international consensus on genetically modified (GM) food labelling and consumers' increasing demand for product information, the Centre for Food Safety (CFS) issued the "Guidelines on Voluntary Labelling of Genetically Modified Food" (the Guidelines) in July 2006 in support of the local food trade's initiative in setting up a voluntary labelling scheme for GM food. The Guidelines set out the principles underlying the recommended labelling approach for GM food, and provide reference to the trade to make truthful and informative labels in a consumer-friendly manner.

2. An evaluation has been conducted to assess the effectiveness of the Guidelines with the following objectives -

(c) To assess the awareness among food traders of the Guidelines;
(d) To acquire a better understanding of the attitude of the trade towards adopting GM food labels;
(e) To assess the use of GM material in food and the adoption of positive labels on food containing 5% or more GM material; and
(f) To assess the use and truthfulness of negative labels.

3. The evaluation comprised three parts: (I) Studies on Traders (Questionnaires); (II) Market Survey; and (III) Laboratory Verification of Information on the GM Food Labels.

(I) STUDIES ON TRADERS: A cross-sectional study on the trade's awareness and barriers/ attitudes towards GM food labelling

Objective

4. To gain a better view of the trade's awareness of the Guidelines, its practice, attitudes and barriers in GM food labelling.

5. A pilot questionnaire exercise involving about 20 companies was conducted in October 2006 and July 2007 to acquire a basic understanding of the views of the trade on the subject of GM food labelling and on the

Guidelines. The pilot study showed that a great number of the surveyed traders were aware of the Guidelines. While only a few of the respondents carried products with GM food labels, around half of them conducted GM testing on their products.

6. Drawing upon experience from the pilot study, a refined questionnaire was sent to 177 traders representing companies of different scales and segments of the food industry in February 2008. Responses from 47 traders (response rate 27%) were received.

Results

Awareness of the Guidelines

7. More than half of the respondents (n=30, 64%) were aware of the Guidelines.

Practice and barriers in GM food labelling

8. Among the respondents, four traders (9%) had products carrying GM food labels. The major reasons for not having GM food labels included: i) GM food labelling not applicable to the products (n=14); ii) GM food labelling increased the production cost (n=9); and iii) did not know how to make GM food label (n=8). Since it could not be identified from the questionnaire exercise alone whether the products carried by the traders actually contained GM content, the questionnaire was mainly to give a general view of the presence of GM food labels in the market. The part of the evaluation involving laboratory testing will deal with the question of prevalence of GM material in food.

Attitude towards the Guidelines

9. If a new GM food label was to be introduced in their companies, 41 of the respondents (87%) were willing to follow the Guidelines' recommendations. The unwillingness among the minority traders were explained by the following reasons: i) absence of legal requirements to follow the Guidelines; ii) did not fully understand GM food labelling; and iii) could not get reliable relevant information from suppliers.

10. Results from the questionnaire survey are summarized as below –

	Results (no. of respondents)[#]		
Response rates	47/177 (27%)		
Aware of the release of the Guidelines	Yes	30/47 (64%)	
	No	17/47 (36%)	
Products carried GM food label	Yes	4/47 (9%)	
	No	28/47 (60%)	
	Don't know	15/47 (32%)	
Reasons of not adding GM food label	i)	Increase in cost	9
	ii)	Don't know how to label	8
	iii)	Lack of resources	7
	iv)	No market needs	4
	v)	No legal requirement	4
	vi)	GM food labelling not applicable to the food products	14
	vii)	Other	5
Follow the Guidelines' recommendation if new GM food labelling is introduced	Yes	41/47 (87%)	
	No	6/47 (13%)	

[#] Figures may not add to 100% due to rounding

(II) MARKET SURVEY

Objective

11. To understand (i) the proportion of pre-packaged food products with GM food labels and (ii) the nature of the labels.

12. A comprehensive database of pre-packaged food products was obtained from a market research company, and random lists of food samples were generated from the compiled database. Samples were purchased from 139 different retail outlets between October and December 2007, and a total of 1 251 pre-packaged food products in the local market were surveyed.

Results

<u>Prevalence and nature of GM food labels</u>

13. Among the samples, 14 (1%) were found bearing GM food labels

and all were negative claims. All the GM food labels were found on food products that contained ingredients with GM counterparts[1].

14. The negative GM claimed products were of five food groups: non-alcoholic beverages (n=9), cereal products (n=2), pre-cooked meals and desserts (n=1), fruit and vegetable products (n=1) and, snacks and confectionery (n=1).

Wordings for GM food labelling

15. The wordings of the labels came in varieties. Some negative claims were on the whole food product[2] and some on particular ingredients[3]. One label included a statement from a third party that the product was not modified genetically[4]. Absolute terms[5] were used in three products.

Documents to substantiate negative GM claims

16. The 14 food samples with negative GM food labelling were from 10 individual traders. Among the eight traders with contact information, all were able to substantiate their declarations with documentary proof: documents from suppliers (n=4), identity preservation certificates (n=2), laboratory testing report (n=1), and organic certificate (n=1).

(III) LABORATORY VERIFICATION OF INFORMATION PROVIDED IN GM FOOD LABELS

Objective

17. To assess the use of GM material in food and to validate the reliability of the information provided on the labels.

18. As corn and soya bean were the two GM crops that were most commonly used in food industry, pre-packaged foods containing corn or soya bean as the main ingredient were taken for laboratory testing. 46 pre-packaged food samples containing soya bean or corn as the main ingredient, including baby food, breakfast cereal, corn snacks, raw corn, raw soya bean, soya milk, tofu, vegetarian food, were taken between August and September

[1] Genetic modification has only been used to develop GM varieties of certain crops such as corn, soya bean, canola, tomato, etc. A corresponding GM variety therefore may not exist for all crops.
[2] For example, "Not Genetically Modified", "Non-genetically Modified Organism (NON-GMO)", "Non-GMO", "Made with no Genetically Engineered Ingredients", etc.
[3] For example, "Made from Non-GM Soy", "Non-GM Soya Beans", "Non-GMO Soybean", etc.
[4] For example, "Third party verified, this oil is made from soybeans that were not genetically engineered".
[5] For example, "GM FREE".

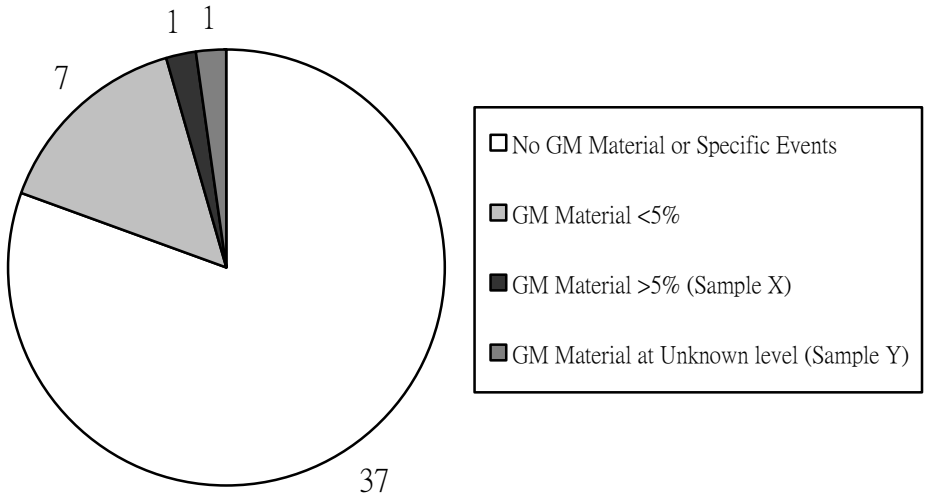
2007 in the market for laboratory testing. Three individual rounds of testing using polymerase chain reaction (PCR) were conducted.

Results

Presence of GM material

19. Among the 46 food samples tested, 80% (n=37) of the food products did not contain any GM ingredient or specific GM events. Eight samples (one baby food, two soya milk, three tofu, and two vegetarian foods) were detected with GM soya bean, i.e. Roundup Ready Soya. In seven of these samples, the level of Roundup Ready Soya detected was less than 5%. The other tofu sample was found to contain 80% Roundup Ready Soya with respect to the total soya bean content ("Sample X"). One corn snack sample ("Sample Y") was found to contain GM corns (0.6% Bt11, 0.65% MON810 and an unknown level of TC15076). The figures indicated that food products containing GM materials above the labelling threshold (5%) were not prevalent among the samples tested.

Results of Laboratory Verification of Information Provided in GM Food Labels -



Accuracy of information on GM ingredient

20. Among the 46 samples, 34 of them did not carry GM food labels; while such labels are found on 12 samples.

[6] A validated quantitative testing method for the GM corn event TC1507 was not yet available in the Government Laboratory at the time of testing.

Food products without GM food label

21. Out of the 34 products without GM food label, only one did not follow the Guidelines' recommendation on providing GM food labelling for food with GM content at 5% or above, i.e. Sample X. As the amount of GM ingredients could not be quantified in the corn snack with specific GM events detected, i.e. Sample Y, its compliance to the Guidelines could not be assessed.

Food products with GM food labels

22. The GM food labels of the 12 samples were all negative claims. Some absolute terms, not recommended in the Guidelines, were also used for GM food labelling. The majority of these food products (n=10) did not contain any detectable GM ingredient, while no specific GM event[7] could be identified from the two of the samples.

Document to support negative GM food labelling

23. The 12 food products with negative GM food labels came from eight different traders. Seven of those traders have documentary proof to substantiate the negative declaration: organic certificates (n=3), identity preservation certificates (n=2), laboratory report (n=1) or document from suppliers (n=1).

OBSERVATIONS

Awareness of the Guidelines

24. While the majority of the respondents were aware of the Guidelines, there was room to increase awareness of the Guidelines, especially among small sized companies. This can be achieved by reintroducing the Guidelines through various channels such as Trade Consultation Forums and workshops, as well as distributing the Guidelines and other relevant printed matters through trade associations and supermarket chains again.

Effectiveness of the Guidelines

25. Traders' attitude towards the Guidelines was generally positive. Most respondents were willing to follow the Guidelines' recommendation for GM food labelling if a new GM food label was to be introduced. Most

[7] A GM event refers to a GM crop carrying a specific recombinant DNA of interest. For example, Bt11 and MON810 represent two GM corn events that have been specifically inserted with different recombinant DNA to exert insect resistance.

labelling claims regarding the absence of GM ingredients were supported by documentation. Furthermore, no negative GM food labelling was made for food products containing ingredients with no GM counterparts.

26. However, no meaningful conclusion can be drawn on the traders' compliance with regard to positive GM food labelling, since there was only one food product with ingredients exceeding the threshold level of 5% for GM food labelling. In fact, this product was subsequently found to bear two different packages on the local market, one with GM food label and the other without. This reflects that GM food labelling in this specific product is feasible. More publicity programmes should therefore target relevant traders and encourage them to follow the Guidelines.

Laboratory testing

27. The level of GM ingredients in a corn snack sample (Sample Y) could not be quantified because a validated quantitative method for the GM corn TC1507 was not yet available in the Government Laboratory (GL) at the time of testing. Nonetheless, an on-going capacity building programme to keep enhancing GL's scope in quantitative testing of different GM ingredients was already in place and the development of a validated quantitative method for the GM corn TC1507 is included as one of the tasks for the GL's 2008 capacity building programme. The method will be ready within 2008.

Food and Health Bureau

Centre for Food Safety
Food and Environmental Hygiene Department
July 2008