

## 香港社會醫學學院

## HONG KONG COLLEGE OF COMMUNITY MEDICINE

founder College of the Hong Kong Academy of Medicine
Incorporated with limited liability



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**COUNCIL 2007-08** 

Hon Bernard CHAN, GBS, JP Chairman of Subcommittee

President

Dr Kathleen So 蘇碧娜

2 May 2008

Dear the Hon Mr CHAN,

Vice-President

Dr S P Mak 麥倩屏 Subcommittee on Food and Drugs (Composition and Labelling)
(Amendment: Requirement for Nutrition Labelling and
Nutrition Claim) Regulations 2008
(the Amendment Regulation)

Chief Censor

Dr T H Leung 梁挺雄 Meeting on 5 May 2008

Honorary Secretary

Dr Thomas Chung 鍾偉雄 Thank you for your letter inviting the Hong Kong College of Community Medicine (the College) to give views on this very important subject relating to nutrition labelling. We would like to submit our comments and views as follows.

Honorary Treasurer

Dr S V Lo 羅思偉 As a professional organisation consisting of medical doctors working to improve the health of the community, the College strongly supports the government's introduction of the Amendment Regulation to better protect the health of people in Hong Kong.

Members

Dr Fung Hong 馮康

Dr Mandy Ho 何孟儀 Nutrition related diseases are among the leading causes of death and disability in our local population. Useful nutrition information facilitates consumers in making informed healthy food choice which in the long run would improve the health of the population and reduce the burden to the health care system due to nutrition related diseases.

Dr William Ho 何兆煒

Dr. Ronald Lam 林文健 We are glad that the government has finally put forward a legal framework to mandate the labelling of core nutrients on prepackaged food which provides the relevant information for consumers to make informed choices, as well as regulate misleading or deceptive nutrition claims.

Prof Gabriel Leung 梁卓偉

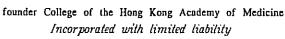
> Dr P Y Leung 梁柏賢

It is noted that the Amendment Regulation allows different format in labelling and exempts the labelling requirements for certain food types and products with small sales volume. The College considers the different labelling format may cause confusion to the consumers. The exemption arrangement will also reduce the overall benefits of the scheme. Of particular



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concern to us is the trade's demand for products of small sales volume with nutrition claims to enjoy the exemption. We think such a relaxation violates the fundamental objectives of the labeling scheme. We are of the view that

once a product makes a nutrition claim, it would have to comply with all the requirements of the Regulation, irrespective of the quantity of sales.

Furthermore, any trade facilitation measures should be kept to the minimum

and not be further expanded, or the overall health gain from this scheme will

be greatly compromised. In addition, the government should actively promote the scheme and educate the consumers and general public in



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understanding and reading the labels.

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Dr William Ho 何兆煒

Dr. Ronald Lam 林文健

Prof Gabriel Leung 梁卓伽

> Dr P Y Leung 梁柏賢

Yours sincerely

Dr Katherine So President,

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Hong Kong College of Community Medicine