



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  
蘇碧嫻

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  
何兆焯

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 understanding and reading the labels.

Yours sincerely

Dr Katherine So  
President,  
Hong Kong College of Community Medicine