

**Food and Environmental Hygiene Department**

\* \* \* \* \*

**Minutes of a Technical Meeting with Trade on  
the Labelling Scheme on Nutrition Information (Importers’/Suppliers’ Subgroup)  
held on 10 October 2007 at 2:30 p.m.  
in Conference Hall, 3<sup>rd</sup> Floor, Edinburgh Place, Central**

**PRESENT:**

**Government Representatives**

Dr HO Yuk-yin	Consultant (Community Medicine), FEHD	(Chairman)
Ms Kay KWOK	Assistant Secretary, FHB	
Ms Heidi HUNG	Senior Administrative Officer (Food and Public Health), FEHD	
Dr Stephen CHUNG	Senior Chemist (Food Research laboratory), FEHD	
Mr LEUNG Sui-sum	Superintendent (Risk Assessment), FEHD	
Mr CHUNG Kwok-wah	Chief Health Inspector (Food Labelling), FEHD	
Ms Jacqueline FUNG	Scientific Officer (Risk Assessment), FEHD	(Note-taker)

**Trade Representatives**

Mr Ronald LAU	The Hong Kong Food Council
Mr WONG P.Y. LESLIE	The Hong Kong Food Council
Mr LEUNG Ho Wing	Hong Kong Health Food Association
Mr Albert TANG	Hong Kong Suppliers Association. Ltd.
Ms Eleanor CHAN	Hong Kong Suppliers Association. Ltd.
Mr SIN Tsz Yeung	Ajilchiban Co., Ltd.
Ms May LAU	AJI-HO-CHINMICO.(HK)LTD.
Ms Pauline PL CHIU	AJI-HO-CHINMICO.(HK)LTD.
Ms Carmen NOU	Betrolli Olive Oil
Mr WONG King Wai	China Argo
Mr PAK Siu Wa	China Dragon Co., Ltd.
Ms Anne LEE	China Pacific Group Ltd.
Ms May KAN	Coca-Cola China Ltd.
Ms Jenny LOH	Effem Foods Inc.
Ms Ivy NG	Fern Ltd.

Mr Freddy FONG	Foodsan Analytics Ltd.
Ms HUI Ka Ying	Force Technologies Ltd.
Mr Joseph KW CHAN	Four Seas Mercantile Ltd.
Ms LAM Ka Po	Getz Bros. & Co. (HK) Ltd.
Ms Isis SZE	Goodwell Sam Cheong Grocery Co., Ltd.
Ms Yvonne CHIU	IDS (Hong Kong) Ltd.
Ms Ellen CHOW	Kellogg's
Ms LI Ying	Kraft Foods (China) Co., Ltd.
Mr Fina LAM	Lark Remedies Ltd.
Mr Alex YEUNG	Lark Remedies Ltd.
Ms LEUNG Pui Fong	Lordly Company Ltd.
Ms Zann QUEK	Lordly Company Ltd.
Ms Irene WONG	Lordly Company Ltd.
Mr Philip KWAN	Mean Johnson
Mr Joseph MA	Nestle Hong Kong Ltd.
Ms Doris CHAN	Nestle Hong Kong Ltd.
Ms Loratta LAW	Nestle Hong Kong Ltd.
Mr WONG Pui Wan	Ocean Prime Co. Ltd.
Mr Benny MA	Oceanfresh Asia Ltd.
Ms LI Wai Shan	Pappagallo Pacific Ltd.
Ms Launita CHAN	Polybrands International Ltd.
Ms Elize WONG	Rainbow Asset Ltd.
Ms Betty PC LEUNG	Sims Trading Co. Ltd.
Mr Wellock LO	Sims Trading Co. Ltd.
Ms Elisa CF TANG	Sino Jet International Ltd.
Mr SIT Tin Wah	Sun Wah Marine Products (HK) Co., Ltd.
Mr Lewis IS LING	Taikoo Sugar Ltd.
Mr HO Kwok Ying	The Asia Provisions Co Ltd.
Mr CHIANG San Sang	Trappist Dairy Ltd.
Mr Eric AU	Unilever Hong Kong Ltd

## Welcoming Remarks

## Action

1. The Chairman opened the meeting by welcoming the trade representatives. He stressed that the proposal presented at the meeting was for discussion and the content had not been finalized. He urged the trade representatives to actively participate in the discussion.

## Agenda Item 1

### **Confirmation of Minutes**

2. The Chairman suggested amending the last sentence of para 7 to “He told the meeting that the Administration would *explore* the details when finalizing this exemption. In the meantime, he welcomed comments and suggestions from the trade.” Minutes of the meeting held on 5 September 2005 were then confirmed.

## Agenda Item 2

### **Revised Proposal on the Labelling Scheme on Nutrition Information**

3. Ms FUNG briefed the meeting on the revised proposal of the Labelling Scheme on Nutrition Information. She remarked that the presentation provided a framework for discussion and the contents were subject to revision. After the presentation, the Chairman invited comments and questions from the trade representatives.

### Phased Approach and Grace Period

4. Representative from the HK Food Council, HK Suppliers Association and selected participants had different views on the phased approach and the length of the grace period, which included the following options (i) One phase with four-year grace period; and (ii) Two phases (i.e., mandatory nutrition labelling when with claims, followed by mandatory nutrition labelling for all prepackaged foods) with a three-year and one-year grace periods for the first phase and second phase, respectively.

### Timeframe

5. A trade representative enquired about the timeframe regarding the legislative process. The Chairman informed the meeting that the current food

labelling regulations would be amended by adding schedules on nutrition labelling. The process would be a negative vetting process, which in general lasted for 28 days. However, LegCo would have an option to extend the process for another 21 days, if necessary. In other words, the whole legislative process would last for a maximum of 49 days.

#### Trans Fat

6. The Chairman remarked that due to the concern of the public and LegCo members, the Administration was considering including trans fat as a core nutrient. A trade representative acknowledged that providing trans fat information was a trend and he preferred to have it included in the core nutrient list and settled with the issue, rather than changing the core nutrient list later on. However, another trade representative had a different view. He preferred not to include trans fat in the core nutrient list and opined that the decision on whether or not to declare the trans fat content should be vested in the trade.

#### Special Emphasis on Ingredients/Nutrients

7. A participant asked how to make “special emphasis” on an ingredient on food label after the enactment of the nutrition labelling regulations. Ms HUNG replied that the Administration was considering amending the relevant clauses in the current food labelling regulations, so that in the future, special emphasis on nutrients should follow only the conditions of making nutrient claims.

#### Sources of Nutrient Information

8. Trade representatives sought clarification regarding the source of nutrient information for nutrition labels. The Chairman informed the meeting that both direct nutrient analysis (i.e., laboratory testing) and indirect nutrient analysis (i.e., calculation made use of food composition data) would be acceptable. In case the trade preferred indirect analysis, special attention should be given to the source of ingredients, amounts used, yield factors, processing methods, etc., as these factors might affect the accuracy of the calculations.

#### Due Diligence Clause

9. A participant asked whether a due diligence clause would be included in the nutrition labelling regulations. Mr CHUNG replied that nutrition labelling regulations would be part of the food labelling regulations and there was already a due diligence clause in the current food label regulations.

### Compliance Date

10. With regard to the compliance date, a trade representative suggested that the Administration should make reference to the approach in Taiwan, i.e., using the manufacturer date as the compliance date. In other words, only prepackaged foods produced on or after the compliance/enforcement date would have to comply with the new requirements. The Chairman explained that the suggestion might not be feasible as the provision of manufacturer date was not required under the Hong Kong food labelling regulations.

### Low Volume Exemption

11. Several trade representatives stressed that the proposed Scheme would greatly affect small volume products, including seasonal products and new products. They urged the Administration to seriously consider the low volume exemption, despite the possible administrative difficulties. The Chairman indicated that the Administration would continue to explore various administrative options.

### **Agenda Item 3**

#### **Technical Guidance Notes (Draft)**

12. Ms FUNG introduced the overview of the draft of the Technical Guidance Note with details of the rounding rules and tolerance limits presented (Annex I).

13. The Chairman told the meeting that the draft of the Technical Guidance Note would be made available at the upcoming technical meeting. He urged the trade representatives to offer comments so that the draft could be more comprehensive and be of use to the trade.

### **Agenda Item 4**

#### **Any Other Business**

14. There being no further business, the meeting was adjourned at 4:50 PM.