

Food and Environmental Hygiene Department

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**Minutes of a Technical Meeting with Trade on
the Labelling Scheme on Nutrition Information (Minorities' Subgroup)
held on 9 November 2007 at 10:00 a.m.
in Conference Room, 4th Floor, Edinburgh Place, Central**

PRESENT:

Government Representatives

Dr HO Yuk-yin	Consultant (Community Medicine), FEHD	(Chairman)
Ms Heidi HUNG	Senior Administrative Officer (Food and Public Health), FEHD	
Dr Anna WONG	Head (Risk Assessment), 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 David WENG	Denes Fries (China) Co. Ltd
Mr HUI Cheng-yiu	Enterprise Company
Mr Charles LUI	Fok Hing (HK) Trading Limited
Mr Raymond WAI	Fok Hing (HK) Trading Limited
Mr CHOI Min-yan	Indonesian Commodities Trading Co.
Mr YANG Min-jie	Sixfifteen Imports Exports Ltd
Mr LAU Chi-fai	Success First Limited
Mr LIM Kenny	Success First Limited
Miss Grace LAU	Yau Shing Hong

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 1 - Revised Proposal on the Labelling Scheme on Nutrition Information

2. 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.

3. After the presentation, the Chairman invited comments and questions from the trade representatives and asked them to share their usual trade practice, such as products origins, target groups, volume of sales, etc.

Grace Period

4. Most of the trade representatives indicated that a two-year grace period was considered too short for them because (i) there might be language barriers with the overseas manufacturers/suppliers and extra time would be needed for communication, (ii) some of the Southeast Asian countries were less developed and lacked the required information/expertise, and (iii) most of the manufacturers in Indonesia were SMEs and they were unable to meet the NL requirements; in such a case, they would need extra time to provide the nutrition information themselves. The Chairman remarked that the length of the grace period had not been finalized by the Food and Health Bureau (FHB), but he told the meeting that LegCo members and the public had expected the NL Scheme to be introduced for a long period of time and the trade should have been prepared for the changes since the release of the proposal several years ago.

Content of Nutrition Labels

5. Several trade representatives urged the Administration to allow “per serving” label and considered voluntary trans fat declaration. The Chairman informed the meeting that permitting “per serving” label was one of the options that the Administration was seriously considering. As for the trans fat declaration, he explained that it was of concern to the public and LegCo members, thus the Administration was studying the option.

6. A trade representative enquired about whether other nutrient declarations, except the required ones (i.e., energy + protein, carbohydrate, total fat, saturated fat, sugars and sodium), would be allowed on nutrition labels. The Chairman clarified that other nutrient declarations would be permitted as long as they were labelled in accordance with the required expression and format.

7. A participant asked how to make “special emphasis” of 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 only needed to follow the conditions of making nutrient content claims.

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 calculation.

Approval of Nutrition Labels

9. One of the trade representatives suggested the Administration to establish an approval scheme for nutrition labels. The Chairman replied that nutrition labels need not be approved before use. However, the trade could employ private consultancy firm for advice. To assist the trade in formulating nutrition labels, he informed the meeting that the Administration would (i) publish a Technical Guidance Note on the Labelling Scheme on Nutrition Information and (ii) conduct workshops after the enactment of the regulations.

Trade Practice

10. *Country Origins and Target Groups* – Among the trade representatives attended the meeting, most of the products carried in their stores were imported from Southeast Asian countries, such as Indonesia and Thailand. Some of them were targeted to the general Hong Kong market (e.g., instant noodles, coconut milk) and these items were mostly re-packed in packages for the Hong Kong market. However, a trade representative admitted that some of his products did not meet local labelling requirements. On the other hand, some other products appealed to expatriates. For these products, the trade would provide stick-on food labels, which

had all the information required by the Hong Kong regulations.

11. *Bar Codes* – The trade representatives indicated that all their products available at the supermarkets were with bar codes following the HK bar code system. As for the remaining products, almost all of them were with bar codes; however, some might not be coded for the Hong Kong market, e.g., only with bar codes meeting the Indonesian bar code system.

12. *Trade Volume and Distribution*– One trade representative was willing to disclose the trade volume – With target groups being the Indonesian natives or expatriates living in Hong Kong, the volume of their products ranged between several thousand pieces per month and twenty to thirty thousand pieces per month. Another representative said it was unlikely for an individual store owner to directly import products from overseas manufacturers as the shipping and handling costs were quite substantial. Most of these individual stores sourced their products from local distributors.

Exemptions from Nutrition Labelling

13. A trade representative suggested an exemption for prepackaged foods sold at food fairs as these products were mostly new products. The Chairman revealed that the Administration was considering an exemption for low volume products. The details were being discussed and if such an exemption would be made available, the trade would have to meet certain requirements and follow certain procedures.

Agenda 2 – Technical Guidance Notes (Draft)

14. 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).

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

Agenda 3 – Any Other Business

16. The Chairman said judging the characteristics of the trade representatives at the meeting, he suggested that participants to be invited to the next technical meeting for importers/suppliers, which would be held in December.

17. There being no further business, the meeting was adjourned at 12:10 PM.