

**Centre for Food Safety**  
**Food and Environmental Hygiene Department**

**Notes of Fifth Meeting of the Trade Consultation Forum held on  
1 June 2007 at 2:30 pm at Conference Hall, 3 Edinburgh Place, Central, Hong Kong**

**Present**

**Government Representatives**

Dr. Y Y HO	Consultant (Community Medicine) (Chairman) (Risk Assessment and Communication)
Dr. Della SIN	Assistant Secretary for Health, Welfare and Food (Food and Environmental Hygiene) Special Duties 1
Dr. Samuel YEUNG	Principal Medical Officer (Risk Assessment and Communication)
Dr. Terence CHEUNG	Senior Medical Officer (Risk Assessment)
Mr. K W CHUNG	Chief Health Inspector (Food Labelling)
Mr. F M WONG	Senior Health Inspector (Food Labelling)1
Mr. W F CHENG	Chief Health Inspector (Import/Export)1
Ms. Joan YAU	Scientific Officer (Risk Assessment)3
Ms. Melissa LIU	Scientific Officer (Risk Assessment)5
Mr. H M WONG	Superintendent (Risk Communication) (Notes-taker)

**Trade Representatives**

Ms. Lina LIM	A.S. Watson Industries
Ms. LEUNG Wing Sze	Abbott Laboratories Ltd.
Mr. Hermann HOFMANN	Advantage Asia Pacific Ltd.
Mr. Edward CHAK	Aeon Stroes (Hong Kong) Co. Ltd.
Mr. Ricky PANG	Aeon Stroes (Hong Kong) Co. Ltd.
Ms. Annie WONG	Amoy Food Ltd.
Ms. Maria HO	Amoy Food Ltd.
Ms. KHO Wai Wai	Circle K Convenience Stores (HK) Ltd.
Mr. M. W. LAU, Joseph	Convenor of the Concern Group on Registration of Proprietary Chinese Medicine
Ms. Sara CHAN	D.K.S.H Hong Kong Ltd.
Ms. CHAN Sze Yeg, Wendi	Dah Chong Hong Ltd.
Ms. Becky LAU	Effem Foods Inc.
Mrs. Jenny LOH	Effem Foods Inc.
Ms. LUI Fung Kwan	Fonterra Brand (HK) Limited
Mr. Freedy FONG	Foodsan Analytics Limited
Ms. Jackie LIU	Glaxo Smithkline Ltd.
Ms. LEUNG Man Yee, Patricia	Hong Kong Food Science & Technology Association
Ms. Wayne Cheng	HK Gourmet
Ms. Angella LAU	Hong Kong Health Food Association
Mr. Albert TANG	Hong Kong Suppliers Association Ltd.
Ms. Elearnor CHAN	Hong Kong Suppliers Association Ltd.
Ms. Jessica CHUI	Kjeldsen & Co. (HK) Ltd.
Mr. LEE Kwong Lam	Kowloon Chamber of Commerce

Mr. Stephen CHOI	Lee Kum Kee International Holdings Ltd.
Ms. Michelle CHAN	Mannings
Mr. Michael KWAN	Mannings
Mr. Vincent WONG	Mannings
Mr. Philip KWAN	Mead Johnson Nutritionals
Ms. Katherine YEUNG	Nestle Hong Kong Ltd.
Ms. Nicole WONG	Nestle Hong Kong Ltd.
Ms. Doris CHAN	Nestle Hong Kong Ltd.
Mr. Joseph MA	Nestle Hong Kong Ltd.
Mr. Jonathan CHOW	Nikken's Japanese Food Co. Ltd.
Ms. Amy LAM	Pacific Coffee Company
Mr. Peter JOHNSTON	ParkN Shop/A.S. Watson Group
Mr. Eric TAM	Pat Chun International Ltd.
Ms. Grace YU	Procters Gamble Hong Kong Ltd.
Ms. Stephaine SHUM	Saint Honore Cake Shop Ltd.
Mr. Wellock LO	Sims Trading Co. Ltd
Ms. Betty LEUNG	Sims Trading Co. Ltd.
Ms. May KAN	Coca-Cola China Ltd.
Mr. CHAN Yin Chung, Joseph	Swire Coca Cola HK Ltd.
Mr. WONG Kam Chuen	Swire Coca Cola HK Ltd.
Mr. HO Kwok Ying	The Asia Provisions Ltd.
Mr. Allen HO	The Dairy Farm Group
Mr. Samuel CHAN	The Garden Company Limited
Mr. LAU Yiu Fai	The Hong Kong Food Council Ltd.
Dr. P.Y. WONG, Leslie	The Hong Kong Food Council Ltd.
Mr. Albert YAN	Unilever Hong Kong Ltd.
Mr. AU Hoi Fung, Eric	Unilever Hong Kong Ltd.
Mr. Ivan CHAN	Vitasoy International Holdings Ltd.
Mr. Joe HO	Vitasoy International Holdings Ltd.
Ms. Agatha YIU	Winner Food Products Ltd.

### **Opening Remarks**

1. The Chairman welcomed all to the meeting and introduced staff of the Centre for Food Safety (CFS) attending the forum.

### **Agenda Item 1**

#### **Confirmation of the notes of last meeting**

2. The notes of last meeting were confirmed without amendments.

### **Agenda Item 2**

#### **Matters arising from the notes of last meeting**

3. Mr. F M WONG referred to the paragraph 15 of the notes of last meeting and clarified that the grace period of the Food and Drugs (Composition and Labelling) (Amendment) Regulations would lapse on 9 July 2007. The new regulations would come into force on 10 July 2007.

4. There being no further matter arising from the notes of last meeting, the meeting proceeded to Agenda Item 3.

### **Agenda Item 3**

#### **Results of the Risk Assessment Study on Nutrient Values of Fruit and Vegetables**

5. Ms. Melissa LIU presented the results of the risk assessment study on nutrient values of fruit and vegetables. CFS conducted a study to determine the nutrient values of fruit and vegetables and proposed recommendations to maintain a healthy diet. The study covered a total of 82 types of fruit and vegetables. Chemical analyses were conducted to determine the contents of energy and ten nutrients, namely carbohydrate, protein, total fat, saturated fat, cholesterol, dietary fibre, sugar, sodium, calcium and vitamin C. The results showed that fruit and vegetables were generally low in energy, fat as well as sodium and also not containing cholesterol. They were also good sources of dietary fibre and vitamin C in our diet. However, their nutrient values varied depending on the cooking and preparation methods. Members of the public were recommended to maintain a balanced diet by consuming at least two servings of fruit and three servings of vegetables daily. On the other hand, food premises were suggested to provide more fruit and vegetables in their dishes and to serve sauces separately if possible.

6. The Chairman informed the meeting that results of the study on nutrient values of fruit and vegetables would be publicised next week.

### **Agenda Item 4**

#### **Results of the Risk Assessment Study on Dietary Exposure to Chloropropanols of Secondary School Students**

7. Ms. Joan YAU presented results of the risk assessment study on dietary exposure to chloropropanols of secondary school students. This study investigated the level of chloropropanols in foods, estimated the dietary exposure to 3-monochloropropan-1,2-diol (3-MCPD) and 1,3-dichloropropan-2-ol (1,3-DCP) of secondary school students in Hong Kong as well as assessed the associated health risks. It was estimated by using the Food Consumption Survey conducted in local secondary school students in 2000 by the Food and Environmental Hygiene Department (FEHD). The levels of 3-MCPD in fruit, vegetables, eggs and dairy products fell below the limit of detection (LOD). Among different food groups, cereal and cereal products, particularly instant noodles, were identified as the main dietary sources of 3-MCPD. In addition, the results indicated that meat, poultry and their products were identified as the main dietary source of 1,3-DCP and sausage was a particularly significant source. The trade was advised to reduce the levels of 3-MCPD in food as far as is technically achievable. In order to reduce levels of chloropropanols in soy sauce, manufacturers were recommended to change the production process by using fermentation method (發酵方法) instead of acid hydrolysis method (加酸水解方法). Given that 3-MCPD could be formed in acid-hydrolysed

vegetable protein (加酸水解植物蛋白), which was a common ingredient in a number of savoury products, manufacturers were advised to choose acid-hydrolysed vegetable protein of low-level of 3-MCPD or other alternatives. On the other hand, consumers were advised to take a balanced diet so as to avoid excessive exposure to certain contaminants from a small range of food items.

8. The Chairman informed the meeting that results of the study on dietary exposure to chloropropanols of secondary school students would be released in July.

9. Some trade representatives would like to know whether there were any studies showing that food processing (e.g. heat treatment) rather than the intentional use of any particular ingredient (such as acid-hydrolysed vegetable protein) in food products, was a major source of 3-MCPD.

10. Ms. Joan YAU replied that though chloropropanols could be generated during food processing under certain conditions, their presence in food might also arise from using a contaminated acid-hydrolysed vegetable protein. Previous surveys indicated that the local manufacturers had made much effort in reducing the levels of chloropropanols in sauces and condiments and had reformulated their sauces by replacing acid-hydrolysed vegetable protein with other alternative ingredients.

11. Some trade representatives worried that the findings of this study might provoke a strong reaction among the public.

12. The Chairman responded that there was no particular type of food which contained very high chloropropanol level found in this study, hence the key message to the public will be focused on promoting a balanced diet so as to avoid excessive exposure to certain contaminants from a small range of food items.

13. One trade representative would like to know if there were any reasons for this study to be conducted among the secondary school students only.

14. The Chairman replied that at present we only had the food consumption data for secondary school students. After completion of the population-based food consumption survey in Hong Kong, the new food consumption pattern for the adult population would be used for risk assessment studies in due course.

#### **Agenda Item 5**

#### **Evaluation of the Effectiveness of Voluntary Labelling System for Genetically Modified (GM) Food**

15. Dr. Terence CHEUNG introduced the background of the Guidelines on Voluntary Labelling of Genetically Modified (GM) Food (the Guidelines), which was released in July 2006. The Guidelines served as a reference to facilitate the trade for labelling of GM food.

16. Dr. Terence CHEUNG continued to inform the meeting that an evaluation of the effectiveness of voluntary labelling system for GM Food would be conducted a year after the release of the Guidelines. Objectives of the evaluation included: to review the labelling of GM food in prepackaged food available on the local market; to verify the reliability of the information stated in the GM labels; to determine the traders' access, attitude towards the Guidelines and their actual practices in following the Guidelines; to identify the barriers for traders to follow the Guidelines. The evaluation results would be one of the important considerations in facilitating the Administration to map out the way forward.

17. One trade representative enquired the threshold level for labelling of foods as "genetically modified".

18. Dr. Terence CHEUNG replied that according to the Guidelines on Voluntary Labelling of GM Food, any food items with 5% or more GM materials in their respective food ingredient(s) could be labelled as "genetically modified" in a prescribed manner.

19. Dr. Della SIN informed that the Health, Welfare and Food Bureau (HWFB) did not have any predetermined decisions for the labeling requirements for GM food so far; however, the views of the trade as well as the public health would be taken into account when considering whether there was a need to implement mandatory labelling.

20. One trade representative expressed that it was difficult to know whether GM ingredients were used or not in food products especially those imported from North America. Furthermore, the conclusion drew from the past public consultation exercise stated that a mandatory system on GM food labelling was not appropriate for Hong Kong and in fact it was not a food safety issue that warranted a mandatory labelling system.

21. The Chairman replied that, though GM food labelling was not a food safety issue, there was an increasing demand for more product information from the general public. However, views from the public and the effectiveness of voluntary labelling system for GM Food were the crucial elements in studying the way forward and the necessity of implementing mandatory labelling.

22. One trade representative enquired the international approach on implementing the labelling system on GM food.

23. Dr. Terence CHEUNG replied that countries like European Union, Australia, Japan and the Mainland had adopted a mandatory labelling system on GM food while in Canada and the United States, the trade could label GM foods on a voluntary basis.

24. Some trade representatives wondered what the Government's intention on the issue of GM food labelling would be since the Codex Alimentarius Commission (Codex) was unlikely to be able to set internationally agreed standards on GM food labelling.

25. Dr. Terence CHEUNG replied that the international community was working towards a consensual policy on GM food labelling. During the meeting in April 2007, the Codex Committee on Food Labelling decided to form a Working Group to further discuss the issue and the ways forward.

### **Agenda Item 6**

#### **New Labelling Requirements on Allergens, Food Additives and Date Format**

26. Mr. K W CHUNG introduced the new labelling requirements on allergens, food additives and date format in prepackaged food which would come into force on 10 July 2007. The new labelling requirements in prepackaged food products included declaring the presence of the eight most common allergy causing substances, labelling the functional class of food additive and its specific name or its identification number under the International Numbering System for Food Additives, and labelling of date format in a more flexible manner.

27. Some trade representatives questioned whether wordings of allergenic substances i.e. soyabeans, soybeans, soy, soya, soya beans, soy beans, “大豆”, “黃豆” and “果仁”, food additives i.e. “著色劑”, “酸” and “膨鬆劑” and date format i.e. “西元年” and “公元年” could be used on food labels.

28. Mr. K W CHUNG replied that the wordings of soyabeans, soybeans, soy, soya, soya beans, soy beans, “大豆” and “黃豆” were all acceptable to be used on food labels while “堅果”, “色素”, “酸味劑”, “年” and “膨脹劑” were recommended to be used rather than “果仁”, “著色劑”, “酸”, “西元年”, “公元年” and “膨鬆劑” in accordance with the new labelling law.

29. The Chairman supplemented that the Labelling Guidelines on Allergens, Food Additives and Date Format (the Labelling Guidelines) was advisory in nature and had no legal effect. Members of the trade were required to refer to respective food laws which governed labelling on allergens, food additives and date format in prepackaged food in Hong Kong and were reminded that they should not falsely describe their food products. In order to facilitate the trade to label correctly the aforesaid subject in their food products, Frequently Asked Questions (FAQ) would be uploaded on the CFS website from time to time for reference.

30. One trade representative questioned if an allergic ingredient had already been indicated i.e. Soy Lecithin, was it still required to label as “Soy Lecithin (soybeans)” or “Soy Lecithin (soybeans product)” in the list of ingredients.

31. Mr. K W CHUNG replied that “Soy Lecithin” was accepted as the name of the allergenic substance “soy” had already been declared in the English label. Similarly, “soy sauce” without mentioning “soyabean product” would be acceptable for the purpose of labelling as an allergenic substance, but, “大豆” should be specified in the corresponding Chinese label, i.e. labelled as “豉油(大豆製品)”.

32. One trade representative enquired whether it was acceptable to use “nuts” instead of “tree nuts” in the list of ingredients.

33. Mr. K W CHUNG gave a negative reply for that question.

34. The trade representative said that Mr CHUNG’s reply was not agreeable. The Chairman added that further clarification on that matter would be sorted out.

35. One trade representative would like to know whether chestnuts, coconuts and pine nuts were categorized as “tree nuts”.

36. Ms. Joan YAU replied that, botanically speaking, “chestnut” was a kind of the tree nuts.

37. The other trade representative enquired whether it was acceptable to state “flavour (without the word flavouring)” and “flavouring (without the word flavour)” i.e. “Smoke flavouring liquid” instead of “Smoke flavouring liquid (flavour and flavouring)” in the list of ingredients.

38. Mr. K W CHUNG replied that examples listed above were all acceptable.

39. One trade representative enquired whether “lactose” was acceptable instead of labelling “lactose (milk product)” for product with “lactose” ingredient.

40. Mr. F M WONG replied that if “lactose” contained allergic ingredient “milk”, the product should be labelled as “lactose (contain milk)” or “lactose (milk product)”.

41. The other trade representative raised similar question, for multiple ingredients product, if the word “milk” had already been indicated in the ingredients list, was it necessary to be specified in bracket for each and every ingredient such as “milk chocolate (sugar), skim milk

powder, lactose (milk product), whey protein (milk product)”.

42. Mr. F M WONG recommended the using of “contains milk” or “contains milk product” in bracket at the end of the ingredients list for multiple ingredients product.

43. One trade representative said that Mr. WONG’s reply was not agreeable. They said that, for multiple ingredients of the same allergenic source, labelling of the allergenic source in one ingredient would serve the purpose e.g. Milk chocolate, lactose, whey protein.

44. One trade representative enquired if a package of English Breakfast Tea Bags marked on the packaging that it contained a blend of Ceylon and Indian tea, was it acceptable not to have an ingredients list stating “Ceylon tea leaves and Indian tea leaves”.

45. Mr. K W CHUNG replied that if the food contained more than one ingredient, it was necessary to specify the name of all ingredients in the ingredients list. For the example listed above, “Ceylon tea leaves and Indian tea leaves” was suggested to be specified in the ingredient list. The Chairman pointed out that specific issues should be considered on a case-by-case basis and it was the responsibility for the trade to comply with the new labelling requirements.

46. One trade representative enquired whether it was acceptable to use the symbol “ / ” to separate the words which shared the same meaning of allergenic substance with different names in different countries. For instances, 麵粉/小麥粉 (“麵粉” was used in Hong Kong while “小麥粉” was used in the Mainland); 醬色/焦糖色素 (“醬色” was used in Hong Kong while “焦糖色素” was used in Taiwan).

47. Mr. K W CHUNG replied that the trade was recommended to use the bracket symbol instead to separate the words which shared the same meaning of allergenic substance i.e. 麵粉 (小麥粉).

48. The other trade representative enquired that was it acceptable to label the sub-class instead of the functional class when labelling the functional class of the food additive i.e. to declare “texturizer” (品質改良劑) instead of “thickener”.

49. Mr. K W CHUNG replied that the 23 functional classes of food additives as listed in the Food and Drugs (Composition and Labelling) (Amendment) Regulation had covered the functional classes of common food additives; and “thickener” should be labelled.

50. One trade representative enquired that ingredients such as “starch” and “calcium carbonate” were not used as food additive and even not able to be classified in the functional

class, was it necessary to label it in the ingredients list as food additives.

51. Mr. K W CHUNG replied that if an ingredient was added to food to achieve certain technological functions, it should be indicated as food additives.

52. One trade representative enquired that was it acceptable to use “or” to separate the alternative ingredients. For instance, using “cream or butter” to standardize the fat levels in processed cheese.

53. Mr. K W CHUNG gave a negative reply for that question.

54. The Chairman added that further information on that regard would be provided.

55. One trade representative enquired whether singular or plural i.e. soybean, soybeans and capital letter or small letter i.e. soy or Soy were acceptable under the new labelling requirements.

56. Mr. K W CHUNG replied that for those elements listed above not affecting the meaning of the word were all acceptable.

57. Some trade representatives expressed the difficulties to comply with the new labelling requirements resulted from ambiguities in the wordings of allergenic substances and food additives used.

58. The other trade representative enquired that some additives were further subdivided by numerical subscripts such as (i), (ii), etc. in accordance with the Consumer Guide to Food Additives, was the name of particular technological functions necessary to be specified as well. For example, “acidity regulator” was not included in the INS No. 335 while it was included in the INS No.335 (i), was it acceptable stating “acidity regulator (335)” on the food label.

59. The Chairman replied that the label of additives stating “acidity regulator (335)” was acceptable.

60. A follow-up question raised by the trade representative that was it necessary to indicate the full name of food additive such as “Caramel I – Plain”, “Caramel IV – Sulphite Ammonia Process”, etc.

61. Mr. K W CHUNG replied that labelling in the full name of food additives was recommended.

62. The trade representative further enquired that was it acceptable to put the sticker label out of the original ingredients list.

63. Mr. F M WONG replied that the trade had to ensure that there was no contradiction on the fact of ingredients between the two ingredients lists on the food products; and written authorization must be obtained from the manufacturer of the said food product if there were any alterations to the existing label.

64. The Chairman concluded that clarifications for those doubts from trade representatives would be made as soon as possible.

(Post-meeting notes: Clarification of some doubts from trade representatives was issued on 4.6.2007)

There being no other business, the meeting was adjourned at 6:30 p.m.