



中華人民共和國香港特別行政區政府總部食物及衛生局
Food and Health Bureau, Government Secretariat
The Government of the Hong Kong Special Administrative Region
The People's Republic of China

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Ms Alice LEUNG
Clerk to Subcommittee on Food and Drugs
(Composition and Labelling) (Amendment) (No. 2) Regulation
Legislative Council Complex
1 Legislative Council Road
Central, Hong Kong
(Fax: 2509 9055)

Dear Ms Leung,

Food and Drugs (Composition and Labelling) (Amendment) (No. 2) Regulation

I refer to your letter of 30 October 2014. Regarding the questions raised by the Subcommittee at its meeting on 29 October 2014, our response is as follows:

- (a) Justifications for not setting the maximum permitted level of the fluoride content of infant formula products and not requiring the labelling of the fluoride content of infant formula products

2. We have decided to make reference to the practice of Australia and New Zealand and require infant formula to be labelled with a statement associated with dental fluorosis if the fluoride content of the product (in a form that is reconstituted or served according to any instructions for use provided) exceeds the maximum level stipulated in the corresponding standard of the Codex Alimentarius Commission (Codex). The statement would:

- (a) indicate that consumption of the formula may cause dental fluorosis; and
(b) recommend that the risk of dental fluorosis be discussed with a medical practitioner or health professional.

3. As far as we know, many major jurisdictions such as Singapore, the United States and the Mainland China have neither regulated the fluoride content of infant formula products nor required the fluoride content to be labelled. The European Union, on the other hand, has set the maximum permitted level of and labelling requirement on the fluoride content of the products. The labelling requirement is more stringent than that of Codex (see Annex).

4. According to Codex, fluoride is not one of the 33 nutrients required to be present in infant formula. Fluoride can protect teeth, yet an excessive intake may increase the risk of dental fluorosis. However, the Dental Service of the Department of Health advised that most of adolescents and children in Hong Kong do not have dental fluorosis.

5. Having regard to international practices, the non-prevalence of dental fluorosis in Hong Kong as well as the need to provide sufficient information for parents to make an informed choice, we decide to adopt the regulatory method as mentioned in paragraph 2 to protect the health of local infants and young children.

(b) Current practice adopted in other overseas jurisdictions such as the European Union, the United States and Singapore regarding the labelling requirements of fluoride content of infant formula products

6. The requirements of Codex and various major jurisdictions are set out in Annex.

Yours sincerely,



(Jeff LEUNG)

for Secretary for Food and Health

Labelling Requirements on the Fluoride Content of Infant Formula Products of the Codex and Various Major Jurisdictions

	Codex	European Union	United States	Australia/New Zealand	Singapore	Mainland China
Whether the labelling of content is required	No	Yes	No	No ¹	No	No

¹ If the fluoride content of infant formula products exceeds the maximum level stipulated in the law, a statement associated with dental fluorosis shall be labelled to:

- (a) indicate that consumption of the formula may cause dental fluorosis; and
- (b) recommend that the risk of dental fluorosis be discussed with a medical practitioner or health professional.