

Centre for Food Safety
Food and Environmental Hygiene Department

Notes of Sixth Meeting of the Trade Consultation Forum held on
26 June 2007 at 2:30 pm at Hall, 2/F, Lai Chi Kok Government Offices,
19 Lai Wan Road, Lai Chi Kok, Kowloon

Present

Government Representatives

Dr. Y Y HO	Consultant (Community Medicine) (Chairman) (Risk Assessment and Communication)
Dr. Constance CHAN, JP	Assistant Director (Food Surveillance & Control)
Mr. W C LEE	Senior Superintendent (Centre for Food Safety)1
Mr. K T TAM	Superintendent (Import/Export)1
Mr. W H LAM	Superintendent (Food Surveillance & Labelling)
Mr. K W CHUNG	Chief Health Inspector (Food Labelling)
Mr. H C YEE	Senior Health Inspector (Food Labelling)2
Mr. H M WONG	Superintendent (Risk Communication) (Notes-taker)

Trade Representatives

Mr. CHEUNG Hiu Ming	A.S. Watson Group
Mr. Peter JOHNSTON	A.S. Watson Group
Ms. Lina LIM	A.S. Watson Industries
Mr. Edward CHAK	Aeon Stores (Hong Kong) Co. Ltd.
Ms. CHO Siu Yung	Aeon Stores (Hong Kong) Co. Ltd.
Ms. Penny CHOW	Aeon Stores (Hong Kong) Co. Ltd.
Mr. Stanley KWAN	Aeon Stores (Hong Kong) Co. Ltd.
Mr. Stephen KWAN	Aeon Stores (Hong Kong) Co. Ltd.
Mr. Ricky PANG	Aeon Stores (Hong Kong) Co. Ltd.
Mr. Daniel POON	Aeon Stores (Hong Kong) Co. Ltd.
Mr. Ben TSE	Aeon Stores (Hong Kong) Co. Ltd.
Ms. Linda WAI	Aeon Stores (Hong Kong) Co. Ltd.
Mr. Jimmy CHAN	AIC Merchandising (Japan) Ltd.
Ms. Lilian TANG	AIC Merchandising (Japan) Ltd.
Mr. Dennis NG	AJI-No-Chinmi Co. H.K. Ltd.
Ms. TAM Man Wah	AJI-No-Chinmi Co. H.K. Ltd.
Ms. Sarah TAM	Amoy Food Ltd.
Ms. Billie LAW	Appolo Ice Cream Co. Ltd.
Ms. NG Wing Sze	Appolo Ice Cream Co. Ltd.
Mr. William CHAU	B&S Company
Ms. WONG Sau Man	BDP Asia Pacific
Mr. KWOK Siu Kwong	Campbell Soup Asia Ltd.

Ms. Heidi NAM	Campbell Soup Asia Ltd.
Mr. LEE Yiu	Chi Wing Company
Mr. WONG King Wai	China Argo
Ms. LO Yi Wah	China Resources Vanguard (HK) Co. Ltd.
Mr. CHOW Yung Chun	Chow Yuen Farm
Mr. Vincent CHAN	City Super Ltd.
Ms. CHO Ka Yuk	City Super Ltd.
Ms. May KAN	Coca-Cola China Ltd.
Ms. CHAN L.Y., Sam	Dah Chong Hong Ltd.
Ms. HAU Pik Pui	Dah Chong Hong Ltd.
Ms. CHAN Sze Yeg, Wendi	Dah Chong Hong Ltd.
Mr. Isaac R. SADIQ	Dairy Fresh Meat
Mr. SIN Wing Cheung	Deqingpuan (HK) Ltd.
Mr. TSANG Yuet Sin	EDO Trading Co.
Mr. James WONG	EDO Trading Co.
Mr. Freddy FONG	Foodscan Analytics Ltd.
Ms. LUI Fung Kwan	Forturn Brands (HK)
Ms. LAM Po Yuk	Future Food (HK) Ltd.
Mr. AU Wing Kee	General Hero Ltd.
Mr. WAI Chung Hing	Golden Prime Ltd.
Mr. WU Chi Yi	Goodbase Trading Ltd.
Ms. Isis SZE	Goodwell Sam Cheong Grocery Co. Ltd.
Mr. SZE TO Chi Wa	H.K. Imported Vegetable Wholesale Merchants Assn. Ltd.
Mr. YUEN Cheung	H.K. Imported Vegetable Wholesale Merchants Assn. Ltd.
Mr. CHAU Wing Kan	Havi Logistics Services (HK) Ltd.
Mr. Howard ZHANG	HK Rice Merchants Enterprises Ltd.
Mr. YONG Sin Tung	HK Rice Merchants Enterprises Ltd.
Mr. CHAN Yeung Nang	Hong Kong Chuen Lung Trading Co.
Ms. Eleanor CHAN	Hong Kong Suppliers Association Ltd.
Mr. Joshua SUEN	Hong Kong Suppliers Association Ltd.
Mr. POON Ka Ki	Hung Cheung Poultry Ltd.
Mr. CHAN Kin Shing	Intl Trade Alive Fish & Food Ltd.
Mr. Jason CHENG	J.I.C. Meat & Poultry
Mr. WAN Tai Yin	Kam Fat Egg I/E Co.
Mr. Nanse MASANOBU	Kanematsu (HK) Ltd.
Mr. Jack LEE	Kanematsu (HK) Ltd.
Mr. CHAN Kwok Chuen	Kastor Development Ltd.
Ms. Kay NG	Kee Wah Bakery Ltd.
Mr. Dennis NG	Keencity Enterprises Ltd.

Mr. LAM Chiu Ming	Keentech Forzen Food Co. Ltd.
Mr. TANG Wai Kuen	Kin Yuen Foodproduct Co. Ltd.
Ms. Jessica CHUI	Kjeldson & Co. (HK) Ltd.
Mr. CHENG Sing Leung	Kui Fung Hong
Ms. KWOK Siu Ki	Kwok Yuen Poultry & Finsheries Co. Ltd.
Mr. LEE Kwong Lam	Kowloon Chamber of Commerce
Mr. LAM Wan Ling	Lark Remedies Ltd.
Mr. YEUNG Tak Wai	Lark Remedies Ltd.
Mr. Stephen CHOI	Lee Kum Kee International Holdings Ltd.
Ms. LI Shuk Fung, Josephine	Lee Kum Kee International Holdings Ltd.
Mr. William LI	Lucullus Food & Wines Co. Ltd.
Ms. Jade CHEN	Luen Fung Flour Noodle Fty Ltd.
Ms. Kimmy CHENG	Luen Fung Flour Noodle Fty Ltd.
Mr. YOUNG Kam Yim	Luen Tai Hong
Ms. Sally SIU	Macon Enterprise (HK) Co.
Ms. Emily WOO	Macon Enterprise (HK) Co.
Mr. MAN Kwok Shing	Manina Frozen Foods Co. Ltd.
Ms. Joanna YIP	Master Kong (HK) Trading Co. Ltd.
Mr. CHAN Kai Ming	Mei Wah Company
Mr. CHAU Yan Chi	Mei Wah Company
Ms. WONG Mei Foon	Mekey Food Services (HK) Ltd.
Ms. CHEUNG Mei Ngor	Mineichi (HK) Industries Ltd.
Mr. CHEUNG C. K., Eddie	Mitsumoto Trading Co. Ltd.
Ms. Doris CHAN	Nestle Hong Kong Ltd.
Ms. Eleanor CHAN	Nestle Hong Kong Ltd.
Mr. Joseph MA	Nestle Hong Kong Ltd.
Mr. Jonathan CHOW	Nikkens Japanese Food Co. Ltd.
Mr. KWOK Chung Wing	Nine To Five Ltd.
Mr. Jones LAM	Nissin Foods Co. Ltd.
Ms. Carman MAN	Organic Land Co. Ltd.
Ms. Catriona NISBET	ParkN Shop
Mr. LAI Fu Shou	Pen Gon Ao Hong Kong Logistics Co. Ltd.
Mr. HUI Wai Yeung	Perfect Frozen Meat Co. Ltd.
Mr. SO Yiu Nam	Plati-Luck Ltd.
Mr. YAN Chun Wah	Red & White Foods Supplier
Mr. CHUNG Tim Ming	Royal Products Co. Ltd.
Ms. Stephanie SHUM	Saint Honore Cake Shop Ltd.
Mr. NG Wing Yan	San Kee Chan Ltd.
Mr. CHAN Chi Kit	Sang Tai Hoo

Mr. CHEUNG Ka Ho	Sims Trading Co. Ltd.
Ms. Amy YIP	Sims Trading Co. Ltd.
Mr. LI Kwong Siu	Sun Hing Eggs Chong
Mr. LAM Wing Chuen	Sun Wah Hong
Mr. LUI Pak Lun	Sun Wah Japanese Food Co. Ltd.
Mr. HO Kwok Ying	The Asia Provisions Co. Ltd.
Ms. Eunice MOK	The Chinese Manufacturers' Association of HK
Mr. NG Chi Ming	The Dairy Farm Co. Ltd.
Mr. Mabel CHENG	The Dairy Farm Group
Mr. Allen HO	The Dairy Farm Group
Mr. Samuel CHAN	The Garden Co. Ltd.
Mr. TONG Lap Kei	The Garden Co. Ltd.
Mr. Bryan YIP	The Garden Co. Ltd.
Mr. WONG P. Y., Leslie	The Hong Kong Food Council Ltd.
Mr. Covington LEUNG	The Hong Kong Health Food Association
Mr. Perry SIT	The Hong Kong Health Food Association
Mr. Andrew LAU	The Kowloon Dairy Ltd.
Ms. Paloa A. Ramirez GASCA	Union Pacific Ltd.
Mr. Albert YAN	Unitever Hong Kong Ltd.
Mr. WONG Yiu Kau	UNY (HK) Co. Ltd.
Mr. LEUNG Yuk Yin	Wallem Shipping (HK) Ltd.
Ms. WONG Yu Kam	Wang Cheong
Mr. KWOK Shiu Leung	Wang Yuen Co. Ltd.
Ms. Patricia LEUNG	Wellcome Co. Ltd.
Mr. LO Kar Man, May	Wellcome Co. Ltd.
Mr. Island CHAN	William Food Co. Ltd.
Mr. WONG Rover	William Food Co. Ltd.
Mr. LI Ying Wai	Winbo Treading Intl Co. Ltd.
Mr. LAI Kam Cheong	Wing Cheong Co.
Mr. CHAU Ka Chun	Wing Cheong Co.
Mr. CHOW Wing Cheung	Wing Cheong Co.
Mr. TANG Luen Kwong	Wing Cheong Co.
Mr. LO Wo Chuen	Wing Kee
Ms. Tracy TONG	Wing Lee Trading (China) Co. Ltd.
Mr. LI Sai Cheong	Wing On Department Stores
Ms. Judy OR	Wing On Department Stores
Mr. Clement CHAN	Wing Sang Cheong Ltd.
Mr. Raymond CHU	Wing Sang Cheong Ltd.
Mr. LAM Siu Ping	Winner Food Products Ltd.

Mr. CHAN Kin Chung	Woo Lee Fruit & Vegetable Co. Ltd.
Ms. Olivia HUNG	Wyeth (H.K.) Ltd.
Mr. Peter KWAN	Wyeth (H.K.) Ltd.
Ms. Carmen LIU	Yuk Lee Eggs Shop 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. The Chairman opined that as many trade representatives were interested in matters concerning Agenda Item 3, matters arising from last meeting would be discussed later in Agenda item 4 – Any other business. The meeting then proceeded to Agenda Item 3.

Agenda Item 3

Pre-statutory Enrollment Scheme for Food Importers and Distributors

4. Mr. K T TAM introduced the Pre-statutory Enrollment Scheme for Food Importers and Distributors (the Scheme) to the meeting. A voluntary enrollment scheme was launched for poultry egg importers by the CFS in December 2006 and extended to all egg wholesalers / distributors in January 2007. A plan to amend the existing Imported Game, Meat and Poultry Regulations (Regulations) had been working in place for expediting the legislation process in tightening control of the importation of poultry egg by registration of egg importers. The Government was also planning to amend the Regulations to require registration of game, meat and poultry importers. In response to the increasing number of food safety incidents in Hong Kong, it was necessary to create a comprehensive database of all food importers and distributors in Hong Kong as well as to enhance traceability of imported food so that in the event of a food incident, the information would be made available to CFS to facilitate tracing the problematic food. The Scheme encouraged food importers and distributors to enroll with CFS on a voluntary basis and to keep proper records of the movements of imported foods. A timetable for the Pre-statutory Enrollment Scheme based on food types would take effect from August 2007. Enrollment priority would be given to those foods of higher risks which included game, meat, poultry, live food animals, milk, frozen confections, vegetables, fruits, fish and fishery products. In the Scheme, importers and distributors would be required to provide particulars of contact person who can be reached by the CFS in case of emergency. Apart from an application for

enrollment in paper form, the CFS was preparing to accept the online application submitted at the CFS website. Food traders to be enrolled would be informed of the details about online application once available. With the consent of traders, lists of importers/wholesalers/distributors would be uploaded onto website of CFS for public information.

5. The Chairman added that the initial scheme would be a voluntary one but there were plans to introduce a mandatory scheme in the future. The mandatory scheme had to be worked out with the trade. Further consultations as appropriate would be arranged in order to seek views from the trade on the proposed scheme.

6. One trade representative enquired whether it was technically feasible to make changes of the enrolled information by the trade themselves through the internet.

7. Mr. W C LEE replied that CFS would provide a mechanism of communication between the trade and CFS to make amendments of the enrolled information.

8. One other trade representative wondered whether it was required to enroll several times for importers who imported multiple food items.

9. Mr. W C LEE replied that for the trade which imported multiple food items, they were required to adhere to the enrollment timetable; for example, if the trade imported both meat and milk products, they had to enroll twice during specific enrollment period.

10. The Chairman further enquired whether it would be possible for the trade to enroll multiple food items at the same time so that they need not to go through the enrollment process again.

11. Mr. W C LEE replied that the objectives for implementing the Scheme were to help the trade to get familiarised with the future mandatory registration scheme and enable CFS to gain some experience for designing the full scheme. At this stage, the Scheme would be carried out based on food types.

12. One other trade representative suggested CFS to provide an enrollment number for each member of the trade so that they would use it for the enrollment of different types of food items at one time.

13. The Chairman supplemented that one of the reasons for the Scheme based on food types was to enable CFS to inform relevant food importers or wholesalers to take appropriate action in the event of a food incident.

14. One other trade representative recommended CFS to provide more information about the categorisation of food types for reference by the trade.

15. Mr. W C LEE replied that the principle of the categorisation of food types would be provided once available.

16. One other trade representative enquired whether there would be any enrollment fee for each enrollment and what the Scheme was going to require, for example, a health certificate for every food item.

17. Dr. Constance CHAN replied that decision on the enrollment fee had yet to be made. On the other hand, CFS was still working out the detailed enrollment requirements for the Scheme and more information on that regard would be announced soon.

18. One trade representative wondered how to deal with the food which comprised various kinds of food types.

19. Mr. W C LEE replied that if the food was mixed with different food types, it might fall into “others” category. Detailed information on that regard would be provided if available.

20. One other trade representative expressed the difficulties in getting the health certificate for some food products such as manufactured food products; and the spirit of traceability was not merely putting down the name of importers and wholesalers but should be a record “from farm to table”, which meant all points of the whole supply chain were continuously recorded so that it would really be able to trace the source of the problem in the event of a food incident.

21. Mr. W C LEE replied that it was understandable that there were difficulties in getting the health certificate for some food items. But for high-risk food items such as meat and poultry products, most of the overseas countries could provide the health certificate.

22. One other trade representative enquired whether there would be criminal liability for the breach of the Scheme.

23. Dr. Constance CHAN replied that if the mandatory registration scheme was put into effect, there would be criminal liability for any breach of the related law.

24. One other trade representative enquired what sort of information would be uploaded onto the CFS website for public information; and what sort of information CFS needed in order to ensure the traceability.

25. Mr. W C LEE replied that information such as company names, addresses, contact telephone numbers, etc. would be uploaded on the CFS website when the trade had enrolled under the Scheme and did not have objection to the disclosure of the concerned information. According to the Scheme, all those involved in food importation and distribution should keep proper records of the movement in and out of the food handled by them, such as invoices, contracts, batch numbers and relevant information of suppliers, etc.

26. One trade representative asked whether there would be an independent Food Safety Ordinance or amendment to the Imported Game, Meat and Poultry Regulations.

27. Dr. Constance CHAN replied that the possibility to incorporate the Enrollment Scheme into the Imported Game, Meat and Poultry Regulations would not be ruled out so as to strengthen the control of imported food.

28. One other trade representative suggested CFS to accept electronic record, for example, electronic invoices.

29. Dr. Constance CHAN replied that CFS would take it into consideration.

30. Some trade representatives worried that there would be an enormous administrative cost for keeping record of food movements and it would be a problem in getting records from all involved parties.

Agenda Item 4

Any other business

31. Mr. K W CHUNG referred to the notes of the last meeting and clarified the followings: (paragraph 32) the use of “nuts”, “果仁” and “堅果” were acceptable but the use of “tree nuts” and “木本堅果” in accordance with the current labelling law of Hong Kong was the most appropriate one; (paragraph 39) the use of “lactose” or “lactose (milk product)” was acceptable; (paragraph 41) legal advice would be sought on whether it was acceptable to specify the name of an allergenic substance only once in the list of ingredients instead of specifying the same allergenic substance repeatedly in the list; (paragraph 46) the use of a slash symbol (“/”) was acceptable if it was used to separate the words of ingredients which shared the same meaning in order to provide more information for the customers; (paragraph 52) it was not acceptable to use “or” to separate the alternative ingredients (an example mentioned last time was “cream or butter”) as the current labelling law required to list the actual ingredients used.

32. One trade representative enquired whether it was acceptable to use “hazelnut” and “almond” alone without the specification of “nut” or “nut product”.

33. Mr. W H LAM replied that the use of “hazelnut” in English was acceptable as the word “hazelnut” itself had already indicated the presence of the allergen (i.e. nut). In Chinese, the use of “榛子 (木本堅果)”, “榛子 (堅果)” or “榛子 (果仁)” was acceptable. However, the use of “almond” with specification of the allergenic source “nut” or “nut product” was required.

34. One other trade representative enquired that in view of the discrepancies in the Chinese expression in some countries, whether it was acceptable to use “改良澱粉” and “味道強化劑” instead of “改性澱粉” and “增味劑”.

35. Mr. W H LAM replied that specific functional class of food additives should be used according to the Schedule 3 to the Food and Drugs (Composition and Labelling) Regulations; therefore, for the examples listed above, “改性澱粉” and “增味劑” should be adopted. Flexibility might be exercised so as to facilitate the trade on condition that there was no violation of the legal requirements.

36. One other trade representative enquired whether it was required to specify nutrition contents of high calcium or low fat in the list of ingredients.

37. Mr. W H LAM replied that according to the sub-paragraph (4B) of the Schedule 3 to the Food and Drugs (Composition and Labelling) Regulations, if the presence of a particular ingredient or the low content of a particular ingredient was emphasized, a declaration of either the minimum/maximum percentage by weight of that ingredient in the food or the actual amount of that ingredient in the food was necessary. Also, any declaration required by sub-paragraph (4B) should appear either next to the name of the food or in the list of ingredients in close proximity to the name of the ingredient in question.

38. One trade representative enquired whether it was necessary to add a label on the outermost package of a bulk pack which contained individually labelled small packs of food.

39. Mr. W H LAM replied that a label should at least be able to let the customers see clearly all relevant information as required by the food laws. If the packaging material of the bulk pack was a transparent one such that a customer/purchaser could see clearly the information on the label of the individual small pack, it would be acceptable even there was no additional label on the bulk pack. However, if the package material for the bulk pack was an opaque one or the bulk pack was in such a state that a customer/purchaser could not see clearly the information on the label of the individual small pack, an additional label on the bulk pack was required. If an additional label was given on the bulk pack, the information on the additional label should be correct and tally with that on the label of the individual small pack.

40. One trade representative enquired whether it was acceptable to affix a new label (sticker) on top of the label of a packaged food.

41. Mr. W H LAM replied that it was acceptable if the act was duly authorized by the manufacturer or packer responsible for labelling the food, i.e. a person capable of effecting such in accordance with in the Food and Drugs (Composition and Labelling) Regulations, Cap. 132W.

42. One other trade representative enquired whether there was any exemption of the labeling requirements for alcoholic beverages.

43. Mr. K W CHUNG replied that according to the Schedule 4 to the Food and Drugs (Composition and Labelling) Regulations, any drinks with an alcoholic strength by volume of more than 1.2% but less than 10% were exempted from the whole Schedule 3 except paragraph 3 and 4, whereas wines and other drinks with an alcoholic strength by volume of 10% or more were exempted from the whole Schedule 3 except paragraph 3.

There being no other business, the meeting was adjourned at 5:30 p.m.