

**Centre for Food Safety**  
**Food and Environmental Hygiene Department**  
**Notes of the Thirty-second Meeting of the Trade Consultation Forum**  
**held on 9 December 2011 at 2:30 p.m.**  
**in Conference Room at Room 102, 1/F, New Wan Chai Market,**  
**258 Queen's Road East, Wan Chai, Hong Kong**

**Present**

**Government Representatives**

Dr. Y. Y. HO	Consultant (Community Medicine) (Risk Assessment & Communication)	(Chairman)
Dr. Teresa CHOI	Principal Medical Officer (Risk Assessment & Communication)	
Ms. S. C. CHEUNG	Superintendent (Food Surveillance)1	
Mr. W. K. CHENG	Superintendent (Food Surveillance)2	
Mr. M. L. KWAN	Superintendent (Import/Export)2	
Mr. C. L. CHIU	Chief Health Inspector (Food Labelling)	
Ms. Waiky WONG	Scientific Officer (Chemical)	
Ms. Janny MA	Scientific Officer (Microbiology)	
Ms. Melissa LIU	Scientific Officer (Nutrition Labelling)	
Ms. Melva CHEN	Scientific Officer (Total Diet Study)	
Ms. S. W. CHUNG	Superintendent (Risk Communication)	(Secretary)

**Trade Representatives**

Ms. Caroline YUEN	American Consulate General Hong Kong
Ms. Terence YUEN	Amoy Food Ltd.
Ms. Katherine POON	A.S. Watson Industries
Ms. Rita CHAN	A.S. Watson Industries
Mr. Louis FU	Bai Ling Pharmaceutical Ltd.
Ms. Winnie KWONG	Bai Ling Pharmaceutical Ltd.
Mr. TSANG Wah Him	Calbee Four Seas Co. Ltd.
Mr. WONG Kai-Man	Calbee Four Seas Co. Ltd.
Ms. Ming CHEUNG	Campbell Soup Asia Ltd.
Ms. Grace LAU	China Dragon Inspection & Certification (H.K.) Ltd.

Ms. Samantha TSANG	China Resources Retail (Group) Co., Ltd.
Mr. Dennis CHAN	City Super Limited
Mr. Cyrus FUNG	CMC Testing & Certification Laboratory
Ms. Elaine WONG	CMC Testing & Certification Laboratory
Ms. May KAN	Coca-Cola China Ltd.
Mr. CHEUNG Chun Kit	DCH Food Mart
Mr. Freddy FONG	Foodscan Analytics Ltd.
Ms. Yvonne CHAN	General Mills HK Ltd.
Ms. B. HO	Gourmet House Limited
Mr. Allen PANG	Home of Swallows Ltd.
Ms. CHAN Hoi Yan	Hong Kong Gourmet
Mr. Peter JOHNSTON	Hong Kong Retail Management Association
Ms. Frenda WONG	Hong Kong Suppliers Assoc. Ltd.
Ms. Corine LIU	Hong Kong Yakult Co., Ltd.
Mr. Gary LO	Hong Kong Yakult Co., Ltd.
Mr. TAKURO Mori	Hong Kong Yakult Co., Ltd.
Mr. Jack TSE	Kofcr Enterprise (Asia) Company Limited
Ms. Alice WONG	Lee Kum Kee Int'l Holdings
Ms. Daphne KWOK	Lucullus Food & Wines Co. Ltd.
Ms. Kennie SIU	McDonald's Corp. APMEA QA
Ms. Eva POON	McDonald's Restaurants (HK) Ltd.
Mr. Joseph MA	Nestle Hong Kong Ltd.
Ms. Jan LOK	Pappagallo Pacific Limited
Ms. Cactus LAI	Parknshop
Mr. Tony CHOW	Pfizer Corporatism HK Limited
Ms. Maggie LEE	Procter & Gamble Hong Kong Ltd.
Ms. Cherrie SHUM	Red Bull Hong Kong Limited
Mr. Josh DENG	Saint Honore Cake Shop (Shenzhen) Ltd.
Mr. WONG Kam Chuen	Swire Coca-Cola HK Ltd.
Mr. Victor KOK	Tai Pan Bread & Cake Co., Ltd.
Mr. James HO	The Asia Provisions Co., Ltd.
Mr. Kelvin CHAN	The Dairy Farm Company Ltd.
Ms. May LO	The Dairy Farm Company Ltd.
Mr. Tommy TONG	The Dairy Farm Company Ltd.
Ms. Wendi CHAN	The Dairy Farm Company Ltd.
Ms. Loraine HO	The Garden Co., Ltd.
Mr. Samuel CHAN	The Garden Co., Ltd.
Ms. Tess WONG	The Garden Co., Ltd.

Mr. Perry SIT	The Hong Kong Health Food Association
Dr. Sidney NG	The Hong Kong Health Food Association
Ms. Candy HON	The Hong Kong Standards and Testing Centre Ltd.
Ms. Kammy YEUNG	The Hong Kong Standards and Testing Centre Ltd.
Ms. AU Wing Sum	The Mira Hotel
Mr. Eric AU	Unilever Hong Kong Ltd.
Mr. Attlee LAU	URC Hong Kong Co Ltd
Mr. CHAN Chi Kong	Vitasoy International Holdings Ltd.
Ms. CHAN Pui Yee	蓮記鮮果店 (No English Name)

### **Opening Remarks**

The Chairman welcomed all trade representatives to the meeting and introduced government representatives.

### **Confirmation of the Notes of Last Meeting**

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

### **Agenda Item 1**

#### **Progress of Small Volume Exemption Application**

3. Mr. C. L. CHIU reported that, for the period of 1 January to 25 November 2011, about 8,232 applications for Small Volume Exemption (SVE) were received. Among these applications, 7,673 had been approved and about 300 rejected. There were 303 applications withdrawn. As at 25 November 2011, applications pending processing were 239. On the same day, there were 19,493 SVE products for sale in the market. The amount of SVE

products for sale in the market might be attributed to provision of nutrition label to formerly SVE products, cessation of sale of the products and interruption of supply of SVE products from some countries such as Japan after the earthquake in the country on 11 March 2011.

## **Agenda Item 2**

### **Registration of Food Importers and Food Distributors under Food Safety Ordinance**

4. Mr. M. L. KWAN advised the meeting that the Food Safety Ordinance (FSO) had come into operation since 1 August 2011 and the grace period would end on 31 January 2012. He told the meeting about the content of FSO and the publicity activities that had been organized to familiarize food trade with the legislation. The Chairman supplemented that registration under FSO was a significant requirement to promote food safety in Hong Kong. Traders who had not yet registered under FSO should expedite their actions as this was a statutory requirement.

5. In reply to enquiries from a trade representative, Mr. M. L. KWAN advised that traders holding food business licence issued by Food and Environmental Hygiene Department (FEHD) were exempted from registration under FSO. The Chairman explained that it was attributed to the availability of contact information with FEHD from records of food licence to trace the source of supply in case of food incidents. Hence, holders of food business licence were exempted from registration under FSO.

## **Agenda Item 3**

### **Trade Guidelines on Preparation of Legible Food Label**

6. Ms. Melissa LIU briefed the meeting about the proposed Trade Guidelines on Preparation of Legible Food Label. She advised that legible food label with essential information of product appropriately marked was an important tool to assist consumers in making choices. The guidelines were aimed at assisting food trade to provide legible information on food label. According to the legislation, the following information was required to be legibly marked on food label unless otherwise exempted:

- a) Name of the food;
- b) List of ingredients;
- c) Indication of durability;
- d) Special conditions for storage or instruction of use;
- e) Count, weight or volume;
- f) Name and address of manufacturer or packer; and
- g) Nutrition label.

7. Ms. Melissa LIU pointed out that traders were at liberty to design the food label of their products but they should note the legal requirements on legibility of all mandatory required information. It was worried that consumers might have difficulty in reading the label for information they required if the food label was improperly designed. In this connection, the guidelines would provide principles and examples of legible food labels for trade's reference. She explained there were three elements to qualify as a legible food label: suitable font size, good contrast and enough spacing, and illustrated examples on good legible label and illegible one. She recommended that, in order to comply with the legibility requirement of the food labelling regulation, traders should note the three elements for legible food labels when preparing these labels for prepackaged products.

8. A trade representative opined that the type size of wordings should be determined according to the social environment and demographic factors of the local community and not simply based on that adopted in other countries. She noted that the majority of products in Britain were not able to meet the type size of at least 8 point. There was suggestion that the type size should be determined in relation to the weight or volume of each product and the type size of 3 point was acceptable and should be allowed in view that food label in Hong Kong was printed in bilingual languages. On the other hand, contact information of manufacturer might require larger type size to facilitate consumers making enquiry about the product. There was suggestion that only one standard should be allowed to avoid confusion and prevent conflicts. Trade representatives opined that the type size of not smaller than 2 mm should be adequate for a bilingual food label and a type size of 8 point would cause the food label too large to cover the original information on the package. The Chairman thanked members for their views and advised that the guidelines on legality of food label were not statutory requirements, though members of the trade were encouraged to follow them. Deviation from the guidelines would not lead to legal actions, provided that the label was legible.

9. The Chairman advised that the trade guidelines had been uploaded to Centre for Food Safety (CFS) website for comments of trade. Views on the guidelines were welcome until end of January 2012.

#### **Agenda Item 4**

#### **Food for Special Dietary Use**

10. Ms. Melissa LIU briefed the meeting about food for special dietary use and advised that the Nutrition Labelling (NL) Scheme was not applicable to food for special dietary uses due to special nutritional requirements of these target subgroups, but there were calls for clarification on the definition of such food. She said that the subject and the underlying principles with examples, including whether certain products could be classified as food for such uses, had been discussed with trade on various occasions. Frequently Asked Questions on CFS website had been updated or added to further clarify the situation. In case of uncertainty, relevant information for individual products would be considered to assess whether such products were considered as food for special dietary uses. For food products which were “food for special dietary use”, traders were encouraged to label their energy and nutrient contents to provide information for reference of consumers and health professionals. To promote good practice, traders were encouraged to note and follow relevant Codex Alimentarius Commission (Codex) guidelines and standards on food for special dietary uses.

11. A trade representative advised that suitable information on nutrients was provided on nutrition label of products that were classified as “food for special dietary use” for reference of health care personnel and patients on the content of products. In general, these food products followed relevant Codex guidelines and standards on food for special dietary uses when labeling them and they required prior approval before supplying them to hospitals. When these products were for sale in market, nutrition label was provided for them.

12. The Chairman advised that to determine whether a food product was “food for special dietary use”, the nutrition label and advertisement on the product would be examined. If the food product was consumed by the general public, it would not be regarded as “food for special dietary use” and compliance with NL Scheme was required. Even for “food for

special dietary use”, traders were encouraged to provide more information for reference of consumers to make choice.

## **Agenda Item 5**

### **Claims of Prepackaged Food Products**

13. Ms. Melissa LIU briefed the meeting about the recent concern on claims made on prepackaged food products. There were two types of claims: nutrition claims covered by the NL Scheme and other claims not regulated by the NL Scheme. The NL Scheme covered all prepackaged food, except formulae and food for children under the age of 36 months, and other foods for special dietary uses. Nutrition claims were regulated under the NL Scheme in three aspects: nutrient content claims, nutrient comparative claims and nutrient function claims. These claims must fulfill relevant conditions stipulated in the legislation, including nutrient content in the product and other requirements. On the other hand, other claims must be factual and not misleading. In this respect, these claims should only be made when its truthfulness was substantiated based on the following principles:

- a) When a claim was made on the function of specific substance(s), the quantity of the substance(s) in the food product must be sufficient to provide the said function; and
- b) The claim should be based on scientific substantiation and scientific consensus.

14. Ms. Melissa LIU continued that in the evaluation of these claims, CFS would also make reference to decisions and information from renowned authorities and organizations. It was worth to note that different overseas jurisdictions might be offering different opinions on claims that were considered acceptable or not acceptable on prepackaged foods, as well as



their conditions of use. Examples of claims rejected by European Union were provided for traders' reference. Enforcement action would be considered when there is insufficient substantiation on a claim, and the trade would be requested to provide relevant information to facilitate CFS's evaluation. CFS would keep in view of the international development concerning the regulation of claims and make reference to the international situation on claims of prepackaged food products when evaluating these claims. In reply to enquiries of trade representatives, Mr. W. K. CHENG advised that sec. 61 of the Public Health and Municipal Services Ordinance, Cap. 132 regulated false labeling and misleading labeling. Enforcement actions would be taken under the law against traders for providing false/misleading labels, including any claims on the labels. Traders should ensure that information on food labels was true and not misleading. The Department might ask the traders to provide scientific documents to support suspicious claims for assessment. Despite, sufficient time would be allowed for traders to provide the evidence and documents.

15. The Chairman advised that there were views from Audit Commission and Legislative Council that urged CFS to exercise closer supervision of food safety with the authority vested in CFS under law and this authority was applicable to all food products. Some authorities opined that certain claims were not acceptable. Their views would be taken reference of when conducting inspection in the market to identify whether there were such claims. In reply to enquiries of a trade representative, the Chairman clarified that it was not the priorities of CFS to regulate claims that were accepted by overseas renowned authorities even there were conflicting opinions on the same claim between different overseas authorities. The focus of CFS was on claims that were not accepted by these authorities. In response to suggestion of a trade representative, the Chairman undertook to consider the appropriateness of releasing claims that were not accepted by overseas authorities for

reference of trade.

16. There were enquiries from a trade representative on whether claims of “DHA”, “Omega-3”, etc. could be made on food products not covered by NL scheme. The Chairman replied that those claims were being studied and reference would be made to the conclusions of other authorities. Ms. Melissa LIU advised that not all claims of “DHA” were rejected by overseas authorities. Regarding infant formula, suppliers of such products should note the prohibition of claims declaring certain health benefits in overseas jurisdictions and to ensure all claims on their products were factual and not misleading. Products with non-factual or misleading claims would be required to be removed from the market. The Chairman responded that for food targeted at children under the age of 3, it did not come under the regulation of NL Scheme. Instead, the Department of Health was drafting a code of practice for marketing breast milk substitute. He believed that the code of practice would soon be released for consultation with trade and was expected for implementation in 2012. Under this code of practice, there would be recommendations on claims, label, marketing and composition of milk substitute. Trade should keep in view of the development of this code of practice and CFS would inform trade when there was further development. He also advised that there were strong opinions with the Consumer Council on claims of infant formula milk powder and this was being looked at.

#### **Agenda Item 6**

##### **Draft Trade Guidelines on Safe Production of Buns and Sandwiches**

17. Ms. Janny MA briefed the meeting about the Draft Trade Guidelines on Safe Production of Buns and Sandwiches. This set of guidelines was intended for food business

preparing and selling buns and sandwiches. It aimed at assisting food trade implement food safety measures when producing and selling wholesome and safe products. She introduced the content of the draft to the meeting. She highlighted general measures to ensure the safety of buns and sandwiches especially regarding temperature control. Except certain buns which were safe to store at room temperature within their shelf-life, as a general rule, after proper cooling, if buns and sandwiches had been kept under room temperature, including time for transportation, they should be handled as follows:

- a) For less than 2 hours, they could be refrigerated for final use later or used before the 4 hours limit is up;
- b) For more than 2 hours but less than 4 hours, they should be used within the 4 hours limit is up but should not be returned to the refrigerator; and
- c) For more than 4 hours, they should be discarded.

18. Ms. Janny MA recommended some tips for the safe production of coconut and cream buns as follows:

- a) Estimate the demand including the cream filling carefully to avoid over-production;
- b) Use separate utensils to handle raw food and buns;
- c) Some artificial creams might be safe at room temperature due to the high sugar content. They would not support the growth of dangerous microorganisms due to the high sugar content. In case of doubt, advice should be sought from the supplier;
- d) Avoid prolonged storage at room temperature, to discard coconut and cream buns which had been kept under room temperature for 4 hours; and

e) Always follow good personal hygiene practices.

19. Ms. Janny MA also recommended some tips for the safe production of hot dog as follows:

- a) Store ingredients properly, to refrigerate perishable items at 4°C or below;
- b) Estimate the demand carefully to avoid over-production;
- c) Cook sausages thoroughly, except ready-to-eat ones, with core temperature at 75°C or above for 30 seconds;
- d) Refrigerate hot dogs which were kept under room temperature within 2 hours or discard them after 4 hours; and
- e) Always follow good personal hygiene practices.

20. Ms. Janny MA continued that the draft trade guidelines had been uploaded to the CFS website and welcomed trade to offer their views before the end of December 2011. Thereafter, the guidelines would be finalized. The finalized guidelines would be distributed to trade and uploaded to CFS website for reference.

21. A trade representative sought advice on which type of buns could be safe to store at room temperature. Ms. Janny MA advised that in general buns, except those which were not subject to manual handling after baking and without perishable fillings, should be kept under temperature control as mentioned in paragraph 17.

### **Agenda Item 7**

#### **The First Hong Kong Total Diet Study: Dioxins and Dioxin-like Polychlorinated biphenyls, Inorganic Arsenic**

22. Ms. Waiky WONG briefed the meeting about the results of the first Hong Kong Total Diet Study (TDS) on two groups of substance, namely dioxins and dioxin-like polychlorinated biphenyls (PCBs) and inorganic arsenic. She first gave an overview on TDS and said that TDS was internationally recognised as one of the most cost effective way to estimate the dietary exposure of various population for a range of chemicals or nutrients and to provide scientific basis for assessing food safety risks and regulating food supply. She added that the first TDS in Hong Kong had commenced in 2010 and would last until 2014 with the objectives of estimating the dietary exposures of the Hong Kong population to over 130 substances, including contaminants and nutrients and assessing any associated health risks.

23. Ms. Waiky WONG continued to highlight the main findings on the two groups of substances:

a) Dioxins and dioxin-like PCBs –

The general population in Hong Kong was unlikely to experience major undesirable health effect from the exposure to dioxins and dioxin-like PCBs. Due to the carcinogenic risk of these substances efforts should be made to reduce the dietary exposure of the population. Although fish was found to be the major food contributor to the dietary exposure, moderate consumption of a variety of fish is recommended as fish contain many essential nutrients. Prevention and reduction of human exposure should be done through source-directed measures. International efforts in the reduction of dioxin emission and their subsequent contamination of food are essential to reduce the dietary exposure to dioxins and dioxin-like PCBs of the population. Codex Alimentarius Commission has issued a

Code of Practice which gives guidance to national authorities, farmers, and feed and food manufacturers on preventive measures.

b) Inorganic arsenic –

Having considered the carcinogenic risk of inorganic arsenic, efforts should be undertaken to reduce the exposure of the population to inorganic arsenic. Rice was found to be the major food contributor to the exposures of inorganic arsenic. This was consistent with data in other countries where rice was the staple food. Trade was advised to observe good agricultural practices to minimise inorganic arsenic contamination of foods, such as avoid using arsenic contaminated water for irrigation. The findings were not sufficient to warrant changes in basic dietary advice on healthy eating, i.e. have a balanced and varied diet, and take cereals, such as rice, noodles, oatmeal and bread, as the major dietary source.

24. Ms. Waiky WONG said that the reports on the first Hong Kong TDS on various substances would be issued in phases and uploaded to CFS website and the first one on dioxins and dioxin-like PCBs would be released in mid-December 2011 whereas the second one on inorganic arsenic in early 2012. Members were invited to comment on the reports, particularly on the advice to trade.

25. The Chairman noted the views of a trade representative who found the reports technical and a bit difficult for the press to understand and the suggestion of a cautious approach should be adopted in releasing them to avoid delivering a wrong message to the public. A trade representative sought advice on the method for selecting the 130 substances for analysis in the TDS, including the number of pesticides included in the analysis and the items of pesticides included. Ms. Waiky WONG replied that the selection of 130 substances in the

analysis was based on the concern of the public and the public health significance. The full list was available in CFS website.

26. The Chairman concluded that the TDS aimed at finding out whether Hong Kong citizens were highly exposed to a particular substance. If the level of exposure to a substance was high, regulatory measures would be considered; if not, the study would inform the public the situation and advise measures that might reduce their exposure. More findings would be available in 2012.

### **Agenda Item 8**

#### **Safety Issues of Baby Bottles and Children's Tableware**

27. Ms. Melva CHEN briefed the meeting about RA study on safety issues of baby bottles and children's tableware. The scope of study covered baby bottles and children's tableware commonly available in Hong Kong market that were made of polycarbonate (PC) and melamine, plastic and non-plastic materials containing monomers, additives and / or contaminants commonly identified as potential migrants. The study was based on RA reports from various international and national authorities, academic research papers, technical data from industrial associations and local RA studies and surveillance data. Its objectives were to review the safety issues on baby bottles and tableware for infants and young children and to discuss the health concern of the potential migration of chemicals from these products.

28. Ms. Melva CHEN introduced the findings of the study and pointed out the health concern over a monomer: bisphenol A (BPA), which was found in PC, a common material to

produce milk bottle. There were claims recently that low levels of BPA caused adverse effects on animal brain and behaviour during the developmental period and on reproductive system in animal studies. However, major food safety authorities were of the views that exposure levels to BPA of infants and young children were well below the safety reference dose. Besides, the Joint Food and Agricultural Organization of United Nations (FAO) / World Health Organization (WHO) Expert Meeting held in 2010 opined that it would be premature to conclude that the animal studies on low-dose effect could provide a realistic estimate of the human health risk, based on current knowledge of BPA. Due to uncertainty on the effects of BPA on humans, the international and local situations in treating BPA varied. Some banned the manufacture and sales of BPA baby bottles while others encouraged industry the voluntary phase out of BPA baby bottles. In Hong Kong, CFS supported the industry to stop producing and selling baby bottles and infant feeding cups containing BPA and to undertake efforts to replace BPA with other alternatives or minimise BPA levels in food can lining.

29. Ms. Melva CHEN continued that another material for discussion was formaldehyde, which aroused health concern, due to its migration to food. Formaldehyde was a monomer contained in materials of children's tableware. The International Agency for Research on Cancer classified inhaled formaldehyde under Group 1 of Human Carcinogen in 2004. Nevertheless inhalation of high level of formaldehyde usually occurred in industrial environment. On the other hand, WHO considered that there was no definitive evidence for carcinogenicity upon ingestion. Besides, ingestion of a small amount of formaldehyde is not likely to cause acute effect to human being but ingestion of a large amount can cause acute toxicity with severe abdominal pain, vomiting, coma, renal injury and possibly death. There were local and international reports on the migration of formaldehyde due to



improperly manufactured melamine-ware. For this reason, European Commission had tightened import control of melamine-ware originating in or consigned from the Mainland and Hong Kong. It was therefore concluded that, to protect public health, there was a need in Hong Kong to continue surveillance of melamine-ware in the local market.

30. Ms. Melva CHEN said at the moment there were a variety of alternative materials used in baby bottles and children's tableware but the industry and the public should note that these alternative materials had undergone far fewer tests than PC, or BPA, and the views of FAO and WHO that more studies were needed to assess the safety of these alternative materials. They should also take into consideration the suitability of these alternative materials for use in food container, the availability of authorization for use in such and reports on their compliance with relevant safety standards and their specifications on heat, chemical and impact resistance. She summed up the following:

- a) baby bottles and children's tableware that complied with safety standards were not supposed to pose health risk to consumers;
- b) the responsibility to ensure safety compliance of food contact materials rested with the manufacturers; and
- c) parents should always follow manufacturer's instruction when using baby bottles and children's tableware.

31. Ms. Melva CHEN advised food traders, and manufacturers and retailers of tableware the following:

- a) Obtain tableware from reliable manufacturers and suppliers and use tableware of suitable quality to serve food to customer;

- b) Use tableware according to the product specifications and user instructions;
- c) Manufacturers should adopt good manufacturing practices and make sure baby bottles and tableware comply with safety standards;
- d) Manufacturers should provide product specifications and user instructions including temperature limitations and any restrictions on use;
- e) Retailers should obtain baby bottles and tableware from reliable manufacturers and ensure the products are of suitable quality for food use; and
- f) CFS supported the industry to stop producing and selling baby bottles and infant feeding cups containing BPA.

32. The Chairman advised that the Expert Committee on Food Safety (ECFS) at its recent meeting on the day before this meeting agreed with FAO and WHO that it was immature for the time being to assess the effects of BPA on human based on studies of this substance with animals. However, the industry should implement measures that could reduce the exposure of the public to BPA. The adoption of alternative materials not containing BPA was welcome. He remarked that the RA report on this issue would be released by end of 2011 but the date was not yet known.

#### **Any Other Business**

#### **Progress of Harmful Substance in Food**

33. Ms. S. C. CHEUNG reported that amendments to the legislation on harmful substances in food had been published in the gazette. It was expected that the amendments would come into force in March 2012 after being examined by the Legislative Council in mid-December 2011. Thereafter, the definition for milk in the legislation would include milk powder, condensed milk and reconstituted milk.

### **Gutter Oil**

34. The Chairman invited trade representative to share their experience in gutter oil and the practice of food trade in collecting and recycling cooked oil. He noted that there were no views from trade representatives at the meeting.

### **Communication by Electronic Means**

35. A trade representative sought advice on whether letters notifying CFS on the manufacturer of new food products under the food labelling regulation might be issued in electronic form. The Chairman advised that it was government policy to promote electronic communication and application. Mr. C. L. CHIU advised that there was no objection to submitting the notification through email.

### **Enforcement on Vegetables with Cadmium**

36. A trade representative raised concern over the enforcement actions on cadmium detected from vegetables, the content detected was well within the maximum concentration set in Codex guidelines. He suggested that enforcement actions on the contamination of cadmium in vegetables should be suspended until the tolerance limit in Hong Kong in this respect was amended to come in line with that of Codex guidelines. The Chairman advised that it was difficult to suspend enforcement of legislation when it was in force as it would defeat the purpose of the legislation and might invite criticism. He undertook to take the issue for discussion in CFS. He continued that, in the long run, the maximum concentration would be amended yet the actual amendments to the current regulation might take several

years to complete.

**Date of Next Meeting**

37. The Chairman wished all happy holidays and advised that the next meeting would be held after 2012 Lunar New Year.

38. There being no other business, the meeting was adjourned at 5:10 p.m.