

Centre for Food Safety
Food and Environmental Hygiene Department
Notes of the Sixty Sixth Meeting of the Trade Consultation Forum
held on 11 October 2018 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. Samuel YEUNG	Consultant (Community Medicine) (Risk Assessment & Communication)	(Chairman)
Dr. Henry NG	Principal Medical Officer (Risk Assessment and Communication)	
Dr. Queenie AU	Senior Medical Officer (Risk Assessment) ²	
Ms. Melissa LIU	Scientific Officer (Chemical)	
Dr. Ken CHONG	Scientific Officer (Nutrition Labelling Education)	
Mr. Kenneth YIP	Scientific Officer (Technical Publication) ¹	
Ms. Winsy LAI	Chief Health Inspector (Communication & Response)	
Mr. NG Wai Keung	Chief Health Inspector (Import/Export) ¹	
Mr. CHAN Kar Chun	Chief Health Inspector (Hygiene)	
Mr. WONG Wai Nang	Chief Health Inspector (Other Licensing) Headquarters	
Mr. CHIANG Fat Kwai	Superintendent (Risk Communication)	(Secretary)

Trade Representatives

Ms. LAU Mei Lee	A & W Food Service (HK) Ltd
Mr. Andrew WONG	Abbott Laboratories Limited
Ms. Emily CHENG	ALF Global Hong Kong Ltd.
Ms. Sally LAU	ALS Technichem (HK) Pty Ltd.
Mr. Timmy LAU	Australian Trade and Investment Commission
Ms. Jennifer KWONG	Australian Trade and Investment Commission
Mr. LAM Pak-wah	Best Harvest Food Company Limited
Ms. Joanne LI	Bureau Veritas Hong Kong Limited
Mr. Kenrick CHU	Bureau Veritas Hong Kong Limited
Mr. Alex PANG	Campbell Soup Asia Ltd.
Ms. Silvana FUNG	China Dragon Inspection & Certification (HK) Ltd.

Mr. Chi WONG	China Inspection Co., Ltd.
Ms. Maggie LEUNG	China Resources Vanguard (HK) Co., Ltd.
Ms. CHAN Sze Wing	CIAO International Limited
Ms. SUEN Wai Yan	City Super Ltd.
Ms. Patience CHOI	CMA Testing & Certification Laboratories
Mr. WAN Yunsu	Coils Electronic Co., Ltd.
Mr. Houston WONG	Consulate General of Canada
Ms. WONG Yuen-zhan	Consulate General of Malaysia - Trade Section (Matrade)
Ms. CHAN Si-lok	Dah Chong Hong
Mr. Philip KWAN	Danone Nutricia, Early Life Nutrition (Hong Kong) Limited
Ms. Clare CHENG	Danone Nutricia, Early Life Nutrition (Hong Kong) Limited
Mr. Howard SUEN	Deqing Yuan (HK) Ltd.
Mr. James WONG	EDO Trading Co.
Ms. Kacila LEUNG	Enviro Labs Limited
Mr. Eric LEE	Euroasia Group
Mr. Freddy FONG	Foodscan Analytics Ltd.
Ms. YEUNG Yuk-yue	Fountain Food Product Ltd.
Ms. Karen CHIU	FrieslandCampina (Hong Kong) Limited
Ms. Noel HO	Garden Heart Food Ltd.
Ms. Yvonne CHAN	General Mills Hong Kong
Mr. Chris CHAN	General Mills Hong Kong
Ms. Karin SO	Godiva Chocolatier (Asia) Limited
Ms. Jolene MAN	Golden Resources Development Ltd.
Mr. Stephen CHOI	Griffith Foods (China) Co., Ltd.
Mr. Anson POON	GS1 Hong Kong
Mr. CHAN Wing-kei	HK Elements Ltd.
Ms. Lisa TANG	Hong Kong Ham Holdings Ltd.
Mr. YUEN Lam-piu	Hong Kong Ham Holdings Ltd.
Mr. Peter Johnston	Hong Kong Retail Management Association
Ms. CHENG Suet-chun	Hop Hing Oil Factory Ltd.
Mr. Ronald CHOW	Hung Fook Tong
Ms. Chingmy LAM	Institution of Dining Art
Ms. Georgina SHEK	International Food Safety Association
Mr. Jeffrey HUNG	Intertek Testing Service H.K. Limited
Ms. Amy MOU	Itochu HK Ltd.
Mr. CHOW Tin-yam	Japan External Trade Organization
Ms. Maria HO	Lam Soon (Hong Kong) Limited
Ms. Alice WONG	Lee Kum Kee International Holdings Ltd.
Ms. Caroline HO	Maxim's Caterers Ltd.

Ms. WONG Wai-ting	Mead Johnson Nutrition (HK) Ltd.
Ms. Pauline NG	Miramar Hotel and Investment Co., Ltd.
Ms. CHAN Wai-yin	Miramar Hotel and Investment Co., Ltd.
Mr. Joseph MA	Nestle Hong Kong Ltd.
Ms. Priscilla CHAN	Nissin Foods (H.K.) Management Co., Ltd.
Ms. German CHEUNG	Pappagallo Pacific Ltd.
Mr. Jimmy TSANG	ParknShop (HK) Limited
Mr. Kenneth LAM	Prominent International (Env) Ltd.
Ms. Janice LAM	SGS Hong Kong Ltd.
Mr. Nick LEUNG	Snow Brand HK Co., Ltd.
Ms. Antonia Martinez	Spanish Consulate Trade Commission
Mr. WONG Kam-chuen	Swire Coca-Cola HK Ltd.
Mr. POON Kuen Fai	The Association for Hong Kong Catering Services Management Ltd
Ms. CHEUNG Man-in	The Consulate General of Mexico in Hong Kong
Ms. Pian LEE	The Dairy Farm Co. Ltd.
Ms. Charine LAU	The Dairy Farm Group
Ms. Samantha OOI	The Garden Company
Ms. Kammy YEUNG	The Hong Kong Standards and Testing Centre Ltd.
Ms. Abby WONG	Tingyi-Asahi Beverages Holding Co., Ltd.
Mr. Attlee LAU	URC Hong Kong Co., Ltd.
Ms. Sheena TAM	Wellcome HK
Ms. Winnie KWOK	Whole Sun Ltd.
Mr. LAM Tsz Mau	Winner Food Products Ltd.

In Attendance

Mr. Jason LAM	Assistant Secretary for Food & Health (Food)SD5/Food and Health Bureau
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Opening Remarks

The Chairman welcomed all trade representatives to the 66th meeting and introduced government representatives to the meeting.

Confirmation of the Notes of Last Meeting

2. The two follow-up issues raised in last meeting were addressed in the notes. The notes of last meeting were confirmed without amendments.

Agenda Item 1

Glycidyl Ester in Food

3. Ms. Melissa LIU briefed the meeting that the presence of glycidyl esters (GE) in food has raised concerns in recent years. After ingestion, GE was broken down in the human body to release glycidol, which was considered to be harmful to human health. It was a processing contaminant formed during the oil refining process. It could be found in refined oils and fats as well as foods produced using these substances. During the deodorisation process in oil refining, GE would be formed from diacylglycerols (DAG) under high temperature in a long period of time. While refined vegetable oil was the major source of GE in food, palm oil generally contained higher GE content than other types of vegetable oil. Besides, food containing refined vegetable oil, for instance, infant formula, had a higher GE level. Some studies suggested that the GE level in infant formula produced with palm oil was higher than that in non-palm oil based infant formula. Some animal studies suggested that glycidol has effects of neurotoxicity, renal toxicity, reduced fertility, genotoxicity and carcinogenicity. The International Agency for Research on Cancer (IARC) had classified glycidol as a Group 2A agent which implied it was probably carcinogenic to humans. In view of its impact, overseas organisations have conducted studies on GE levels in food, and have assessed the health effect on GE associated with food intake. The studies confirmed that refined vegetable oil was the major source of GE in food while the GE levels in different

types of refined vegetable oil varied. Apart from fats and oils, GE was also found in other foods containing refined fats and oils. Studies on GE level in infant formula had also been conducted in the US, Canada, Brazil and other countries. Several studies such as those conducted by the Joint FAO/WHO Expert Committee on Food Additives (JECFA) and EFSA indicated GE intake was a possible health concern for infants, in particular formula-fed infants. The Consumer Council (CC) also published study results of GE in cooking oils as well as butter and margarines in recent years. However, no local study on GE level in other foods, such as infant formula, has been identified so far. JEFCA considered that it was inappropriate to establish a health-based guidance value for glycidol as it was a substance that was both genotoxic and carcinogenic. However, it recommended implementing appropriate measures to reduce GE and glycidol concentrations in fats and oils, especially when used in infant formula. Codex Alimentarius Commission also had not established any standards on GE or glycidol in food. However, Codex was drafting a code of practice for reduction of 3-monochloropropane-1,2-diol esters (3-MCPDE) and GE in refined oils and food products made with refined oils. The code of practice included recommendations on the Good Manufacturing Practice (GMP) in oil milling and refining as well as selection and use of refined oils in production of food products made by these oils including infant formula. On the other hand, the European Union (EU) had established regulatory maximum levels for four types of foods in February 2018. For example, the maximum level of GE in vegetable oils and fats and infant formula powder were set at 1,000 mcg/kg and 75 mcg/kg respectively, with the latter to be reduced to 50 mcg/kg starting from 1st July 2019. The Centre for Food Safety (CFS) would keep the latest situation in view and conduct a study on GE in January 2019 to understand the local situation.

4. One trade representative noted that with the new EU regulation taking effect, her company had started to require the European suppliers to provide testing reports as proof of

GE level of the imported raw materials. The company had also tested their refined oil products by conducting baseline survey and the results were similar to that released by CC in 2017.

5. Another trade representative was concerned about the testing methods and availability of testing service for GE in Hong Kong as she understood that the samples including CC's were usually sent to laboratories in Europe for testing. She was afraid that the trade would find difficulty in finding qualified local laboratories for the testing if new law regulating the GE level in oils and food were to take effect in Hong Kong. The Chairman replied that the need of legislation over the GE level would depend on a number of factors including the local situation which needed to be revealed by further study. Regarding the testing methods, the Food Research Laboratory of CFS would closely monitor and make reference to overseas examples. In response to the Chairman's enquiry over the GE testing results obtained by the company, the trade representative responded that the findings were close to those conducted by the other trade representative who had just mentioned, and that the GE level in palm oil was found higher than that in other oils by referencing to the literature published by EU. The Chairman also asked about the major channels of palm oil sales, whether mainly to the retail market or wholesale customers directly. The representative replied that palm oil was more frequently used by the catering industry as ingredients of margarine and shortening.

6. A trade representative remarked that palm oil was not sold as a single commodity to general customers in the Hong Kong market. Instead it was sometimes labelled as "vegetable oil" as one of the ingredients in processed foods. Given the fact that palm oil was cheap and ideal for mass production, if actions were to be taken in controlling the GE level in Hong Kong, he suggested CFS to share with the trade any alternative measures or processing parameters in the oil refining process, particularly the deodorising part, to minimise the formation of GE. The Chairman replied that the Code of Practice being

drafted by Codex addressed those parameters in reducing GE level in oils. Ms. Melissa LIU added that the draft Code of Practice provided suggestions on oil milling and refining, as well as recommendations for selecting suitable raw materials. Recommendations on selecting oil and reducing the oil usage in food production were also provided. The draft Code of Practice was still in drafting stage but was available in Codex's webpage for reference.

Agenda Item 2

Adulteration of Meat

7. Ms. Winsy LAI briefed the meeting of the legislative regulations over adulteration of meat. Section 51A of the Public Health and Municipal Services Ordinance (Cap. 132) stipulated that no person should sell any meat that had been injected with any water or other liquid for human consumption. If such meat is kept, stored, sold or offered or exposed for sale, the person who carried on such business and the manager of the business shall be liable to a maximum penalty of a fine of \$10,000 and imprisonment for 3 months. Examples of adulterated meat included inserting soluble oil into beef and introducing poultry meat with brine raw materials by means of injection. The trade was advised not to import and sell adulterated meat even though the practice and substances injected were acceptable to the exporting country. Import licence would not be issued for importation of adulterated meat even if they were accompanied with valid health certificates issued by the exporting country.

8. A trade representative expressed that Chinese restaurants usually ordered pig's lung from suppliers for making the almond and pig's lung soup. The lungs were washed by pumping water through the organs. He would like to know if this practice which brought water into the organs would be considered as adulteration of meat. Mr. NG Wai Keung replied that adulteration of meat involved injecting water or liquids using specific equipment. But

washing pigs' lungs was only a food preparatory process and would not be considered as adulteration.

9. Another trade representative remarked that processed meat was common in Hong Kong including prepackaged and marinated meat, as well as basted turkey with salt solution injected to keep its moisture. He would like to know whether these products would be considered as “adulterated meat” and if replacing the product description with words like “basted”, “processed”, “nitrated” and “cured” would avoid violation of the law. Mr. NG Wai Keung replied that section 51A of Cap. 132 was applicable to raw meat rather than processed or marinated meat. The difference between raw and processed meat lay in the ingredients and the manufacturing process of the products. If the producer had clearly listed the ingredients in the prepackaged meat and genuinely declared that it was processed, the regulation in section 51A of Cap. 132 would not apply.

10. Another trade representative asked whether the meat would be considered “adulterated” under the following situations: (i) water or salt solution into it like turkey meat; (ii) being marinated; and (iii) be in direct contact with water or ice crystals formed on its surface during washing, slicing, packaging or defrosting process. Mr. NG Wai Keung replied that the direct injection of water or solution was against the law while the latter two situations were not regarded as meat adulteration. The trade representative followed up by asking whether a basted turkey would be allowed if it was labelled as “processed meat”. Mr. NG Wai Keung replied that it depended on if other ingredients were added and any preservation processes were involved. Once any meat had been injected with liquid, it should not be regarded as fresh meat.

Agenda Item 3

Traders' Registration

11. Ms. Winsy LAI briefed the meeting of the registration scheme of food importers and food distributors. According to section 4 and 5 of the Food Safety Ordinance (Cap. 612), any person who carries on a food importation or distribution business was required to register with the Director for Food and Environmental Hygiene (DFEH) as a food importer or food distributor. Any person directly engaged in the transaction of importing or distributing food and has acquired the food, whether through electronic or other means, would be regarded as food importer or food distributor. Food would be considered “acquired” when the person acquiring it takes possession or control of the food even though the food may not be under his custody. Some food importers or food distributors who had already registered or had obtained a licence under other Ordinances were however exempted from this registration requirement as a trade facilitation measure. The exemptions included certain licensees under several subsidiary legislation under the Public Health and Municipal Services Ordinance (Cap. 132), registered stockholders of a reserved commodity under regulation 13 of the Reserved Commodities (Control of Imports, Exports and Reserve Stocks) Regulations (Cap. 296A), licensees under section 8 or permittees under section 14 of the Marine Fish Culture Ordinance (Cap. 353) and certificated owners of a vessel licensed under the Merchant Shipping (Local Vessels) (Certification and Licensing) Regulation (Cap. 548D). Nevertheless, the exempted food importers or distributors were still required to provide supplementary information concerning the business of food importation or distribution. The registration scheme served to identify and contact a more defined group of food traders speedily in a food incident. Any person who, without reasonable excuse, carried on a food importation or distribution process without a valid registration committed an offence and would be liable to a maximum fine of \$50,000 and imprisonment for six months. The registered food importers and food distributors needed to renew their registration every three years upon expiry.

12. A trade representative asked whether CFS had any plans in amending the registration scheme by tabling it for discussion in this Forum as he remembered it had been introduced for long since 2012. Mr. NG Wai Keung explained that the registration scheme was brought up for bringing the attention of newcomers in the trade to comply with the requirement as well as reminding the registered food importers and distributors to renew at an appropriate time. The Chairman replied that CFS had no plans to amend the registration scheme.

Agenda Item 4

Report of Import of Japanese Food

13. Ms. Winsy LAI informed the meeting that importers should report the arrival of every consignment of Japanese food to CFS and needed to wait for the completion of radiation test before sale in the market. Upon arrival of each consignment, importers should report to the respective food control offices depending on the route the goods had been transported through. For meat and poultry (excluding frozen ones), game, egg, milk and frozen confections arrived by the sea route, importers should inform the Food Import and Export Section (Hong Kong and Kowloon Offices) while the Radiation Inspection Office should be reached for all other food types. On the other hand, three Airport Food Inspection Offices were available for reporting food consignments that arrived by the air route. The new conditional import of vegetables, fruits, milk, milk beverages and dried milk from Chiba, Gunma, Ibaraki and Tochigi Prefecture required importers to present radiation certificate and exporter certificate issued by the Ministry of Agriculture, Forestry and Fisheries of Japan (MAFF). MAFF had published a leaflet and made related information online about this new arrangement. Importers were advised to check with exporters whether they had complied with the requirements as set out in MAFF's website. Otherwise, the consignments would be treated as unlawful imports upon arrival. The Chairman supplemented that there were several

reports of importers failing to meet the new requirement, hence the trade was reminded to comply accordingly.

Agenda Item 5

Regulating Trans Fats in Food - The International Scene

14. Mr Kenneth YIP explained to the meeting that trans fats was mainly divided into two types, namely natural trans fats and artificial ones. The major source of dietary trans fats was from industrially-produced food products which were made with Partially Hydrogenated Oils (PHOs) or cooked with PHOs such as fried food and bakery products. PHOs were the primary source of trans fatty acids (TFAs). In view of its negative health impact of increased cholesterol level and higher risk of heart disease, WHO advised that TFAs consumption should be limited to 1% of the daily energy intake and issued the “REPLACE” guideline in 2018 with a view to eliminating industrially-produced TFAs. According to the Food and Drugs (Composition and Labelling) Regulations (Cap. 132W), content of trans fats in prepackaged food should be listed on nutrition labels. CFS also produced the “Trade Guidelines on Reducing Trans Fats in Food” in 2008 for the food trades’ reference. In the United States (US), PHOs was regulated as a kind of food additives to control the dietary trans fats in food while a number of countries including Denmark, Austria, Hungary and Latvia had limited TFAs in the food. WHO expected by the end of 2018, 23 countries would have set mandatory limits on industrially-produced trans fats or banned PHOs. Taking the example of Denmark, the number of commodities with more than 2 grams of industrially-produced TFAs per 100 grams of fat in the market had significantly dropped after the legislation in regulating TFAs took effect in 2004. Though Hong Kong was one of the pioneer cities which implemented nutrition labelling legislation including trans fats, there were no specific regulatory controls on trans fats content in food, apart from infant formula.

To further protect public health, there might be a need to regulate the trans fats level in food.

15. One trade representative was concerned that if Hong Kong followed either approach as referenced from that the US or other European countries was taken, it would limit the choices of food available for local consumers. Hong Kong heavily relied on importing food from foreign countries and the mainland China. Therefore, there was also an urging need to monitor the situation in China in this aspect. The Chairman replied that CFS had been taking the pros and cons of both approaches into consideration. The US focused on restricting the use of PHOs which was the major source of industrially-produced trans fats. The remaining trans fats thus chiefly came from the food processed under high temperature and containing natural ones. On the other hand, taking Denmark as an example, the level of industrially-produced trans fats was deduced by eliminating the natural trans fats content in milk or other products from ruminants. The testing results had been drawn in setting a range of trans fats content in food which the Danish authority took the more lenient end for its legislative measures in restricting the trans fats level. CFS had been studying the experience of both approaches with an aim of reducing the dietary trans fats intake of the general public in Hong Kong. New York City had also adopted measures in directly restricting the trans fats content in food at a very low level (i.e. 0.5 gram per serving) ahead of the federal law which banned the use of PHOs in food. The trade representative added that the restriction in New York City was only limited to the catering industry.

16. Another trade representative asked whether CFS had a timetable for the public consultation on restricting trans fats level in food by legislation. The Chairman replied that the public consultation would tentatively be conducted in 2019.

Agenda Item 6

Risks Associated with Eating Raw Fish and their Regulation in Hong Kong

17. Dr. Ken CHONG informed the meeting of the inherent health risks of eating raw fish with respect to microbiological hazards. In respect of bacteria, there were two broad groups that might contaminate the products at the time of capture. One of them was those that were normally or incidentally present in the aquatic environment, or referred to as indigenous microflora. Examples included *Vibrio parahaemolyticus*, *Vibrio cholerae*, *Vibrio vulnificus*, and *Listeria monocytogenes*. The other group was those introduced through environmental contamination by domestic and/or industrial wastes, for instance *Salmonella* spp. and *E. coli*. One of the most common food poisoning agents in Hong Kong, *Vibrio parahaemolyticus*, was usually present in estuarine and coastal environments in tropical to temperate zones. In controlling the pathogenic *vibrio* species in seafood, Codex published the “Guidelines on the Application of General Principles of Food Hygiene to the Control of Pathogenic *Vibrio* Species in Seafood” (CAC/GL 73-2010). Preventing contamination and minimising the growth of *vibrio* spp. were examples of measures that had to be applied along the whole food chain. In respect of parasites, they were more likely to be present in wild caught aquatic animals and certain aquaculture fish that were not fed exclusively on a diet free of parasites according to the Food and Agriculture Organisation of the United Nations. Examples of common parasites included *Clonorchis sinensis* that were usually present in grass carp and big head carp, *Dibothriocephalus latus* found in salmon and trout as well as *Anisakis simplex* in salmon, trout, herring and cod. The life cycles and host ranges of the parasites were different. Parasitic risks could be controlled and reduced by providing controlled aquaculture environments and parasite-free fish feed as well as applying freezing treatment. On the other hand, since the growing environment of wild fish could not be controlled, measures were needed at a later stage like freezing treatment. By freezing the fish core at -20 degrees Celsius for 24 hours, the parasites commonly found in raw seafood for sushi and

sashimi would generally be killed, while longer time or lower temperature is required for killing flukes. It should be noted that traditional marinating and cold smoking methods were not sufficient to kill fishery parasites. The Public Health and Municipal Services Ordinance (Cap. 132) required that all food intended for human consumption for sale in Hong Kong, whether imported or locally produced, must be fit for human consumption. At the same time, according to Schedule 1 in the Food Business Regulation (Cap. 132X), “Chinese dishes – Yu Sang” was prohibited from sale in Hong Kong. Food premises manufacturing and/or selling sushi and sashimi must obtain relevant licence or permit from the Food and Environmental Hygiene Department (FEHD). Besides, they must obtain fishery products from reliable sources with health certificates issued by relevant authority of the exporting country. Regarding rainbow trout, or which generally referred to fish with the scientific name *Oncorhynchus mykiss*, there were inherent risks for raw consumption like other raw fishes. Though parasitic risks could be controlled or reduced by some measures, high risks individuals were advised to avoid consumption of raw or undercooked fish.

18. A trade representative asked whether rainbow trout was treated as freshwater or saltwater species. Besides, he would like to know whether raw fish dishes prepared in other Asian style other than Chinese ones would be restricted for sale as the relevant regulation in Cap. 132X did not explicitly define “Chinese Yu Sang”. The Chairman explained that both freshwater and seawater fish can be prone to microbiological hazards including both bacteria and parasites contamination. Thus, categorising rainbow trout as freshwater or saltwater species carried little significance from the perspective of ensuring food safety. Mr. WONG Wai Nang replied that “Chinese Yu Sang” including raw freshwater fish like grass carp and bighead carp is prohibited for sale while sashimi, as one of the restricted foods, consisted of fillets of marine fish. Sale of restricted food requires written permission from FEHD.

19. Another trade representative enquired whether sashimi included raw shrimps that were commonly sold in Thai restaurants. Mr. WONG Wai Nang replied that under Section 3 of the Food Business Regulation (Cap. 132X), sashimi was defined as “food consisting of fillets of marine fish, molluscs, crustaceans, fish roe or other seafood to be eaten in raw state”.

20. A trade representative asked if CFS had identified cases of parasites contamination on sashimi with valid health certificates. Besides, he asked whether the raw fish products would be considered unfit for consumption once parasites were found. The Chairman replied that CFS did not have any relevant figures of the former issue. As for the safety of raw fish found with parasites, CFS would provide scientific information and the fitness for consumption would be subject to the court’s decision.

21. Another trade representative asked whether presenting health certificate was a mandatory requirement or advice for sale of sashimi. Mr. WONG Wai Nang replied that this is a licensing condition for restaurants and food factories selling imported sashimi.

Any Other Business

Licensing Control on Sale of Hairy Crab

22. Mr. WONG Wai Nang recapped the new licensing control for sale of hairy crab. Starting from 3 September 2018, sale of hairy crab in both physical and online shops are subject to obtaining respective permits from FEHD. One of the major licensing conditions of the Shell Fish (Hairy Crab) Permit is that hairy crabs for sale must be obtained from lawful sources accompanied with health certificates acceptable to the DFEH. The trade should obtain the Permit as soon as possible prior to any sale of hairy crab. Health certificates should be provided by physical shops during the time of operation. Online shops should ensure the certificates were available both at the time of applying for and obtaining the

Permit.

23. A trade representative asked whether injected meat could be imported into Hong Kong as long as they were labelled as processed meat. The definition of raw and processed meat were not made clear in the Regulations. But it was mutual understanding within the trade that processed meat had been treated for improving the quality and texture of the meat. Mr. NG Wai Keung replied that the documents accompanied with the consignments of injected meat should justify they were processed meat in this scenario. Otherwise, they would be regarded as raw meat and prohibited from importation. FEHD might acquire further information from the producer through the importer, if needed, on the ingredients and production process when determining whether the meat was processed or raw.

24. Another trade representative asked whether injection into meat was allowed as long as it had been clearly labelled so that consumers were well informed. The claim of adulteration of meat should only stand if the producers or importers purposefully misled consumers into believing that the meat was raw and pure. Mr. NG Wai Keung replied that section 51A of Cap. 132 prohibited all sorts of injection into raw meat, regardless of labelling or purpose of the producer or exporter. And the act of processing meat did not include injection for whatever reasons.

Date of Next Meeting

25. The date of next meeting would be decided later.

26. There being no other business, the meeting was adjourned at 4:34 p.m.