

Centre for Food Safety
Food and Environmental Hygiene Department
Notes of the Sixty Seventh Meeting of the Trade Consultation Forum
held on 14 December 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)	
Mr. Nicky HO	Scientific Officer (Salt Reduction)	
Mr. KWAN Chi Wai	Chief Health Inspector (Food Safety Promotion)	
Ms. Evelyn PUN	Chief Health Inspector (Import/Export)	
Mr. Kenneth YUNG	Research Officer (Risk Assessment)	
Mr. CHIANG Fat Kwai	Superintendent (Risk Communication)	(Secretary)

Trade Representatives

Mr. KWAN Siu Hin	A-1 Bakery Co., (H.K.) Ltd.
Ms. LAM Tsz Yan	Aeon Stores (Hong Kong) Co., Limited-La Boheme Bakery
Mr. Shuichiro OUUKI	Aeon Stores (Hong Kong) Co., Limited-La Boheme Bakery
Ms. Caroline YUEN	Agricultural Trade Office, U.S. Consulate General
Ms. Sally LAU	ALS Technichem (H.K.) Pty. Ltd.
Ms. Kathy HO	Bayer HealthCare Limited
Mr. TSANG Wah Him	Calbee Four Seas Company Limited
Ms. Silvana FUNG	China Dragon Inspection & Certification (H.K.) Ltd.
Mr. Chi WONG	China Inspection Co. Ltd.
Ms. LEUNG Wing Shan	City Super Limited
Ms. Joanna LAM	Consulate General of Belgium
Ms. Zhenzhen YE	Consulate General of Spain Trade Commission

Ms. Christy WONG	Dah Chong Hong, Limited
Mr. LO Chi Hong	Dah Chong Hong, Ltd.
Mr. James WONG	Edo Trading Company
Ms. Kacila LEUNG	Enviro Labs Ltd.
Mr. Benedict TSUI	F.S.I (C.H.K) Association
Ms. Carol LAW	Fonterra Brands (Hong Kong) Limited
Mr. Freddy FONG	Foodscan Analytics Limited
Ms. CHEUNG Hoi Man	Freshfresh
Mr. Stephen CHOI	Griffith Foods (China) Co., Ltd.
Ms. Ada WONG	Herbalife
Mr. Peter KEUNG	Heung Heung Food Products Ltd.
Ms. Katrina NG	Hutchison China Meditech Ltd.
Mr. LIN Cheung Kong	Institution of Dining Art
Ms. Candy LAU	Integrated Market Services Asia Limited
Ms. May KAN	International Food Safety Association
Dr. Peter CHIU	International Food Safety Association
Mr. NG Siu To	International Gourmet Foods Ltd.
Mr. Alan FUNG	Intertek Testing Services Hong Kong Ltd.
Ms. Sum AU	Island Shangri-La Hotel
Mr. CHOW Tin Yam	Japan External Trade Organization
Ms. Abby WONG	KSF Beverage Holding Co., Ltd.
Mr. Conrad BUDD	Lee Kum Kee International Holdings Ltd.
Ms. KI See Wing	Marks and Spencer
Ms. Caroline HO	Maxim's Caterer
Mr. Terence YUEN	MHK Restaurants Limited
Ms. Grace MOK	MHK Restaurants Limited
Mr. WONG Chi Ngai	Michael Wah Hing Co. Ltd.
Mr. Joseph MA	Nestle Hong Kong Ltd.
Ms. Priscilla CHAN	Nissin Foods (H.K.) Management Co. Ltd.
Ms. LO Kit Mui	Nu Skin Enterprises Hong Kong, LLC
Ms. Christine WONG	Nutrifarm Food Trading Company Limited
Mr. Marcus CHENG	Pappagallo Pacific Limited
Mr. Peter JOHNSTON	ParknShop
Ms. Ava WONG	Pizza Hut H.K.
Mr. Kenneth LAM	Prominent International (Environmental) Limited
Mr. Victor KOK	Tai Pan Bread & Cakes Co., Ltd.
Ms. Awin SIU	Tai Tung Bakery Co., Ltd.
Ms. Yola CHUE	The Consulate General of Mexico in Hong Kong
Mr. Andrew LUI	The Dairy Farm Company Limited-Wellcome

Ms. Charine LAU	The Dairy Farm Group
Ms. Kammy YEUNG	The Hong Kong Standards and Testing Centre Ltd.
Ms. CHAN Ka Man	Unicorn Stores (HK) Limited
Mr. CHAN Chi Kong	Vitasoy International Holdings Ltd.
Mr. Herbert LEE	Winner Food Products Ltd.

Opening Remarks

The Chairman welcomed all trade representatives to the 67th meeting and introduced government representatives to the meeting.

Confirmation of the Notes of Last Meeting

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

Agenda Item 1

Cannabis / Tetrahydrocannabinol (THC) in food

3. Mr. KWAN Chi Wai briefed the meeting that recreational cannabis were legalised in Canada since October 2018 while sale of food products and drinks containing cannabis or THC was still unlawful but expected also to be legalised by end of 2019. Recreational cannabis had also been legalised or tolerated in some other jurisdictions, e.g. certain states of the United States and the Netherlands. Food products and drinks containing cannabis or THC might be available for sale in some overseas regions. Though such products might be legalised or tolerated, the United Nations had placed cannabis under international drug control which required stringent regulation. In Hong Kong, cannabis and THC were dangerous drugs controlled under the Dangerous Drugs Ordinance (DDO) (Cap. 134). Any products

(including food products and drinks) that contained cannabis or THC were also controlled under the DDO. Illicitly importing to and exporting from Hong Kong, procuring, supplying, manufacturing, or dealing in or with dangerous drugs were criminal offences which were subject to maximum penalty of life imprisonment and a fine of \$5 million. Illicitly possessing, or smoking, inhaling, ingesting or injecting dangerous drugs were also criminal offences liable to a maximum penalty of imprisonment for seven years and a fine of \$1 million. The Customs and Excise Department (C&ED) issued a press statement in November 2018 reminding members of the public to pay attention to the packaging labels of food products or drinks containing cannabis or THC and observe the domestic legislation on cannabis while purchasing in overseas regions where such products might be available for sale. C&ED also reminded that it was against the law to bring any products containing cannabis or THC into Hong Kong. Food traders were advised to exercise due care and must not import or deal in products containing cannabis or THC. At the same time, C&ED had strengthened the inspection of travellers and cargoes at control points to interdict the import of such products.

4. One trade representative expressed that a range of hemp or hempseeds-containing products were available in countries where cannabis was not legalised like in the UK. The representative was concerned whether these products were also controlled under the DDO in Hong Kong. The Chairman replied that what “hemp” referred to varied across different countries. In Hong Kong, the DDO had clear and specific definitions of cannabis and THC. Regarding other terms commonly used such as “hemp”, it would depend on the actual substances contained. He added that Cannabidiol (CBD) is another cannabinoid present in cannabis plants but is not a dangerous drug controlled under the DDO. However, since it is difficult to extract pure CBD, food products and drinks that contain CBD may likely contain other controlled cannabinoids. In such cases, the producer or trader would still be liable for criminal offence under the DDO and thus the trade members were reminded to note such

possibilities.

5. The same trade representative recalled that C&ED sampled an energy drink following an alleged report of containing cocaine in Europe a few years ago. And the sample, taken from a local supermarket, was later found to contain traces of cocaine and it brought some legal issues to the supermarket. The trade representative claimed that, without formally confirming with the government parties, the sampling result was caused by using analytic equipment in the Government Laboratory contaminated by cocaine that were seized by C&ED. He would like the Government Laboratory to pay extra caution to the sampling work and laboratory equipment if similar drug testing including THC in food would be carried out in future. The Chairman reiterated that law enforcement on dangerous drugs was by mainly C&ED, the Police and the Department of Health (DH). However, since food might serve as vehicle of any dangerous drugs like cannabis and THC, the food trade should pay attention to their products in this regard.

6. Another trade representative said that zero THC level had to be confirmed when registering hemp seeds as a natural health product in Canada. She enquired whether products containing hemp seeds would be allowed for sale if THC was found in the government's testing. The Chairman replied that THC was prohibited in all kinds of food as a dangerous drug. The representative enquired that whether hemp seeds were required for THC testing only in case as a food ingredient as such testing was not needed as a prescribed Chinese medicine under the Chinese Medicine Ordinance (CMO). The Chairman responded that the CMO was enforced by the DH while THC was regulated under the DDO.

Agenda Item 2

Sodium, Total Fat and Trans Fat Contents in Local Bread

7. Mr Nicky HO briefed the meeting that though sodium was essential for body functions, excessive intake of sodium might increase the risk of developing high blood pressure. Meanwhile, excess fat intake was linked to major health problems, including increased risk of heart disease, obesity, hypertension, diabetes and certain types of cancers. And excess trans fat (TFA) intake was linked to increase risk of coronary heart disease. The Government attached importance to the work of reducing salt and sugar intake by the local population, and worked closely with the Committee on Reduction of Salt and Sugar in Food to formulate salt and sugar reduction measures suitable for Hong Kong. According to the CFS, bread was found to be the fourth major contributor to the total dietary sodium intake of the adult population in Hong Kong. Therefore, the CFS sampled non-prepackaged bread and prepackaged bread exempted from nutrition labelling together with prepackaged bread with nutrition labelling available in the market from February to July 2018. Among the 100 samples taken, the sodium level of one sesame roll/bun and one sausage bun sample exceeded the “High Sodium Level” as set out by CFS, i.e. over 600mg per 100g. And the sodium level varied with difference of one to 14 times within the same type of certain bread samples. The average sodium content of white and wholemeal bread was lower than that in Canada and USA recorded in 2010. 33% to 90% of the total number of the samples of certain bread types exceeded the overseas voluntary targets of maximum sodium content, with the most found in croissant (90%) and wholemeal bread and sesame roll/bun (60%). The sodium content of consuming the whole bread with the highest level among all samples was equivalent to 27% of the recommended daily sodium intake. To reduce the sodium level in bread, it was recommend to make reference to overseas recommendations on targets-setting by adopting the “maximum level”, “average/mean level” or “percentage reduction target” approach. Regarding total fat content in breads, all croissant and three cocktail bun samples were found to be “high fat” according to the level set out by CFS. The total fat content of

consuming the whole bread with the highest level among all samples was equivalent to 39% of the recommended daily total fat intake. In respect of TFA content in bread, the sample with the highest content was one to 17 times of the lowest within the same bread category. The TFA content of consuming the whole bread with the highest level among all samples was equivalent to 33% of the recommended daily TFA intake. Compared with the results of previous studies in 2007 and 2012, the average TFA level of all bread categories had remained the same or dropped by 15% to 86% except cocktail buns which recorded a 116% increase of TFA content. The sodium, total fat and TFA intake from bread would be equivalent to 6.5%, 7.8% and 2.9% of WHO's recommended limit of daily intake of sodium, total fat and trans fat respectively if an adult took 43g of bread, i.e. the average consumption of bread in Hong Kong. Among the prepackaged white bread and wholemeal bread samples, the total fat content of one out of five white bread samples was found to be low. The large variations in the sodium and TFA contents within the same type of bread reflected the possibility of the trade to reduce the sodium and trans fat content. The trade was advised to be aware of the sodium, fat and TFA contents of the bread on sale. They could make reference to the CFS' "Trade Guidelines for Reducing Sodium in Foods", "Trade Guidelines for Reducing Sugars and Fats in Foods" and "Trade Guidelines on Reducing Trans Fats in Food" to reduce sodium, fat and trans fat contents in bread, by modifying the preparation methods and ingredients. Besides, they were advised to choose ingredients with lower sodium, fat and TFA content from suppliers and establish a database of the company products so as to monitor the sodium, fat and trans fat contents in foods. More nutrition information for non-prepackaged bread on menu, price tag or other printed materials could also be provided so that consumers can make informed choices.

8. A trade representative expressed that the current recipes of bread making were adopted by experienced bakers for years who usually were more reluctant to change. The bakery had

tried not to add any salt in the baguettes before but the flavour was not that appealing and it was finally decided to keep the original recipe. There were several methods in bread making and salt was not a necessary ingredient. But the breads that were made according to a new recipe may be less attractive to some customers. Another trade representative added that in commercial bread making, sugar was needed for the yeast to consume so that fermentation would take place. And salt was added in to control the extent of fermentation. A trade representative supplemented that the method of not adding in any salt and sugar could take much longer fermentation time that may be up to 24 hours. This would cause problems for commercial bakeries in Hong Kong due to concern of time and space. And this production method required more advanced technique.

9. A trade representative remarked that salt played an important role in the mass production of bread, contributing to the consistency in texture and ease of packaging. Also, eliminating the use of salt would affect the flavour of the breads. Therefore, limiting the salt content through experiment is more practical but he pointed out it would take time for customers to accustom to a new flavour.

10. A trade representative said that it took time for reformulating the breads by reducing the salt content both for the bakers and the customers. As there were various parameters in controlling the mass production including time, temperature, moisture and sugar content that would interact with one another, the reformulation would better be carried out gradually for the trade and the customers to get used to.

11. The Chairman summarised that reducing the salt content was deemed feasible but the customers' preferences and the change in recipes were the major concerns of such reformulation. With reference to the data collected in the CFS' study, the sodium content

varied significantly within the same type of bread in the market. Thus, breads of lower sodium level were available indicating that these products were acceptable to customers. Besides, the objective of reducing 30% of daily salt intake of Hong Kong people by 2025 emphasised on the reduction, instead of elimination of salt usage. He agreed that the target of reducing the sodium content in breads should be attained in gradual and orderly progress so that the customers and the trade could accustom to. Dr. Henry NG supplemented that the trade members were welcome to further contribute their knowledge and views in the coming Technical Meeting to be held on 21 December 2018. The target level of sodium reduction would also be discussed.

12. The Chairman said that the food industry may prefer using partially hydrogenated oils (PHOs) due to its technical property in food processing but he enquired whether it could be replaced by other oil products that were high in unsaturated fats. A trade representative replied that his company had adopted a palm oil, with reference to a laboratory testing report, which recorded 0.14% of TFAs. He enquired whether such TFA level was acceptable. The Chairman responded that the TFAs level of this palm oil was not so high.

13. Another trade representative expressed that TFAs were also found in PHOs' substitutes like butter. And the current testing methods were unable to differentiate natural TFA (N-TFAs) from industrially-produced TFA (IP-TFAs). Therefore, the target of eliminating TFAs posed difficulty to the trade. On the other hand, citing the example in Taiwan, PHOs were already banned and substituted by Fully Hydrogenated Oils (FHOs) which contained zero TFAs. His company had been exploring the possibility of adopting this supplement. In response to the Chairman's enquiry on the cost and quality of the bakery products, he observed no significant effect on both factors.

14. A trade representative said that the function of dough fat in bread was mainly to cover the protein of the gluten in bread and weaken the flour. Its impact on the taste of the products was not as significant as cream fat in products like cream wafers. Replacing PHOs with healthier oils in bread was easier than that in products with cream fat. The hydrogenating process of the oil involved extra effort and costs. Thus, shifting to non-hydrogenated oils instead would not increase the production cost. He also pointed out that it was unavoidable for croissants, of the highest level of TFAs in the study, to keep at such levels of TFAs given the butter content and the N-TFAs inside.

15. Dr. Henry NG drew the reference of a similar study in 2012 regarding the TFA level in breads and asked whether the trade had any knowledge about the reasons of the increase in average TFA level of cocktail buns comparing to that in 2012. A trade representative replied that some of the bakeries still used butter and lard instead of palm oil in making cocktail buns but they were not necessary ingredients.

16. The Chairman emphasised that the focus of reducing TFAs was on IP-TFAs though N-TFAs are naturally contained in food like butter and milk. In reducing IP-TFAs in food, shifting to healthier oils in replacement of PHOs was one of the solutions. A trade representative enquired whether Hong Kong had a timetable of reducing or banning the use of PHOs in view of WHO's suggestion and the legislation in other countries. The Chairman explained that WHO had released the "REPLACE" action package in which legislation was one of the key steps in controlling the use of IP-TFAs. Amongst other measures, CFS had been exploring toward that direction and would discuss and consult the trade if necessary. If IP-TFAs were to be controlled, CFS would study and make reference to the examples of other countries.

Agenda Item 3

Guidance for histamine control in fish and fish products

17. Mr. Kenneth YUNG explained to the meeting that histamine was produced by histamine-producing bacteria which was part of the natural microflora of the skin, gills and gut of freshly caught fish, during the spoilage and fermentation process. It was especially found in fish species that were naturally high in histidine (an amino acid). Scombrototoxin fish poisoning (SFP), or often called “histamine poisoning”, was caused by ingestion of food containing high levels of histamine. Its symptoms included tingling and burning sensation around the mouth, facial flushing and sweating, nausea, vomiting, headache, palpitations, dizziness and rash. The onset of symptoms was within a few hours after consumption of food with high level of histamine and would normally disappear in 12 hours without long term effect. In 2018, CFS found two prepackaged anchovy fillets containing high level of histamine in the local market. Reports of recall of various fish and fish products due to high level of histamine detected by overseas authorities were also found in the past years. In this regard, the issue regarding control of histamine in fish and fish products was brought up. Codex Alimentarius Commission issued the Code of Practice (CoP) for Fish and Fishery Products (CXC/RCP 52-2003) offering recommendations on the production, storage, handling, distribution and retail display of fish and fishery products for the control of histamine. Below are some of the recommendations mentioned in the CoP: (i) harvest vessel operations: as bacterial growth and histamine formation accelerated exponentially with time under unrefrigerated conditions, rapid chilling as soon as possible after death was the most crucial aspect of histamine control. It was recommended to completely surround the fish with sufficient ice to bring the internal temperature of fish to below 4°C as quickly as possible after death of fish; (ii) receiving establishment operations: during offloading of fish from the vessel and at any point of transfer in the supply chain, care should be taken that the cold chain was

maintained. Fish reception would be the best point to monitor and keep fish temperature, signs of decomposition, histamine levels and vessel records; (iii) transportation: transport vehicles should be adequately equipped to keep the fish cold; (iv) processing operations: time-temperature control was also essential throughout the processing operations. Processing room temperature should be maintained as cool as practical and the time which product was exposed to ambient temperature should be minimised to avoid histamine-producing bacteria from growing and producing histamine to unacceptable levels. Adequate heat treatment (e.g. cooking, hot smoking) could kill histamine-producing bacteria and inactivate histidine decarboxylase enzyme. But once histamine was formed, it could not be destroyed by heat. For canned or pouched products, the container protected the product from bacterial recontamination and no further histamine would be produced at ambient temperature. But once the package was opened, histamine formation could occur again. Even after processing and/or treatment, the finished fish products may need to remain chilled until consumed. In summary, the three factors affecting the level of histamine in fish and fish products include (i) the type of fish; (ii) the way of handling of fish; and (iii) the duration, conditions and temperature of storage of the fish. The trade was advised to observe the recommendations in the CoP for Fish and Fishery Products, which the revised version will be uploaded to the Codex website after adoption of the amendments, to ensure food safety.

Agenda Item 4

Disposal of recalled foods

18. Ms Evelyn PUN explained to the meeting that a set of Guidelines was available for carrying out food recalls, mostly on voluntary basis by the food traders, on CFS' website. It appended what actions should be done when food products had to be removed from supply to

or use by consumers for public health and safety reasons. The Government's main role in a voluntary recall was to monitor the progress of the recall and assess the adequacy of actions taken by the food trader concerned. Disposal of recalled product was the final step of a food recall exercise. Conducting the exercise in a proper manner was essential in avoiding the product from entering the market again. A part on "Disposal of recalled product" would be added to the Food Recall Guidelines, requiring all products recalled and those kept by the trader and not distributed must be destroyed or handled appropriately under the supervision of FEHD. As both types of products were being affected, they should be treated in the same manner. Besides, the trader concerned would be advised to provide a daily progress report at the request of FEHD. A few items of the report would be amended, including from "the quantity of stock returned" to "quantity of product returned" in item 4. "The method of disposal or otherwise record of destruction for returned food already disposed by the trader" in item 5 would also be updated as "the method of disposal" only as any disposal work must be under the supervision of CFS. Moreover, the quantity of product not distributed to distributors and retailers and being kept in warehouse would be required in the report as the disposal exercise should cover more thoroughly. All the amendments were proposed to take effect in the 1st quarter of 2019.

19. A trade representative reflected that warehouse rental was expensive for storing the recalled products. Therefore, the disposal would usually carry out non-stop in a day in order to complete as soon as possible and save rental expenses. But FEHD was only able to arrange its staff to monitor the process for a few hours in a day from past experience and that brought inconvenience and extra costing to the traders. He was concerned whether FEHD would allocate extra manpower to facilitate the disposal of recalled items under the new requirement of mandatory monitoring. Ms. Evelyn PUN remarked that the food disposal had been running smoothly with the cooperation of the traders and FEHD. FEHD would

continue to cooperate with the trader should such recall and disposal incidents occur.

20. Another trade representative asked whether FEHD had revised the current Food Recall Guidelines due to some major food incidents. Considering the nature of food recall exercise being voluntary, the Guidelines did not bound trade members to observe. Ms. Evelyn PUN replied that some traders did not provide proofs of proper handling or disposal of recalled items though they had claimed to do so. The revision aimed at providing a clearer direction of handling recalled items. The same trade representative expressed that educating the trade members who did not abide the current Guidelines would be more effective to address the problem. He also enquired whether the traders would need to handle the recalled products if they had already been distributed to other markets like Macau prior to the issue of a recall. Ms. Evelyn PUN replied that while the trader should contact their overseas counterparts, CFS would inform the food safety authorities concerned at the same time. Also, the trade representative pointed out the Guidelines only listed out actions required in a recall exercise when a major food incident had taken place. He believed the Guidelines did not inform the traders about the actions required when a call for withdrawal is issued which do not involve food safety concerns and relate to minor issues like defective products. Such distinction between recall and withdrawal was not mentioned in the Guidelines.

21. The same trade representative continued by expressing his concern over the requirement of reporting the daily progress of the recall exercise to CFS since traders were unlikely to operate every day. Another trade representative also pointed out some fresh food products might have expired or perished before FEHD granted its permission for disposal. Keeping such products in stock for the mandatory monitoring of disposal by FEHD would be impractical to the traders.

22. A trade representative asked for a circulation of the draft Guidelines among the trade members for their comments before the amended Guidelines took effect. Ms. Evelyn PUN replied that the suggested amendments would be distributed for comments later.

[Post meeting note: The revised food recall guideline will be circulated to the trade.]

Date of Next Meeting

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

24. There being no other business, the meeting was adjourned at 4:32 p.m.