

1 Attachment



Consultation Submission_Wyeth (HK) Holding Company Limited.pdf

Dear Sir/ Madam,

In response to the Public Consultation of the Proposed Amendments to the Food Adulteration (Metallic Contamination) Regulations (Cap. 132V), I am writing on behalf of Wyeth (Hong Kong) Holding Company Limited to submit our views as attached.

We would highly appreciate if the Centre for Food Safety will take our views into positive consideration.

For any questions in regard to our submission, please do not hesitate to contact me via email () or phone ().

Yours faithfully,

Michelle Fung

Assistant Manager, Corporate Affairs and Sustainability

Wyeth (Hong Kong) Holding Company Limited

BY EMAIL ()

Centre for Food Safety
Food and Environmental Hygiene Department

**SUBMISSION IN RESPONSE TO PUBLIC CONSULTATION OF
Proposed Amendments to the Food Adulteration (Metallic Contamination) Regulations
(Cap. 132V)**

Wyeth (Hong Kong) Holding Company Limited (“Wyeth Nutrition”), a leading nutrition company in Hong Kong supplying quality nutrition products, welcomes the Centre for Food Safety (“CFS”)’s direction in taking extra steps to protect public health which we share the same goal.

In response to the Consultation Paper on the Proposed Amendments to the Food Adulteration (Metallic Contamination) Regulations (Cap. 132V) (“Proposed Amendments”) released on 16 December 2024, Wyeth Nutrition would like to put forward our views in this submission for CFS’s consideration.

1. Recommendation to establish Maximum Levels for food supplements

Under current regulation, no Maximum Levels (“MLs”) on metallic contaminants has been established for food supplements. Manufacturers thus need to check every raw material on the product recipe to evaluate the safety of food supplements. In addition to practical difficulties during execution, it is also not ideal to conduct this individual risk assessment for each product, especially when no international MLs exist for certain raw materials.

This lack of specific MLs in Hong Kong may limit the choice for importing products from key manufacturing countries/areas such as Mainland China, Canada, ASEAN, Europe, where MLs for food supplements are already established. We thus ask for CFS’s consideration to establish MLs for food supplements based on data and scientific assessment.

2. Provide sufficient time for transition

This Proposed Amendments outlines an 18-month transitional period following the enactment of the amended legislation.

Though the proposed changes are basically aligned with Codex standards and/or relevant international regulations, manufacturers need to align suppliers across different markets for example to fulfill the new MLs prior to the production and release of finished products. This is also added to the situation that some categories of products are actually undergoing changes in response to the Preservatives in Food Regulations that has just came into effect in December 2024, it thus will be helpful for extending the transitional period to 24 months to allow adequate time for the necessary adjustment.

We would greatly appreciate if CFS could consider our recommendations favorably.

Wyeth (Hong Kong) Holding Company Limited