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Letter to CFS.pdf

Dear Sir/Madam,

Please find attached our comments regarding metal content in food under the Food Adulteration (Metallic Contamination) Regulations (Cap. 132V) for the Government's consideration. Thank you.

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Yours faithfully,

Secretariat 秘書處

The Hong Kong Health Food Association 香港保健食品協會

THE HONG KONG HEALTH FOOD ASSOCIATION LIMITED

Centre for Food Safety (CFS)
Food and Environmental Hygiene Department

Dear Sir/Madam,

Subject: Recommendation to Establish Maximum Levels for Food Supplements

We refer to the public consultation on the proposed amendments to the Food Adulteration (Metallic Contamination) Regulations (Cap. 132V) launched by the Government on 16 December 2024. On behalf of our association members, we would like to provide the following feedback for the Government's consideration.

1. Currently, no Maximum Levels (MLs) for metallic contaminants have been established for food supplements under the existing regulations.
2. As a result, manufacturers had to identify ways to evaluate the safety of food supplements, such as checking every raw material in the product recipe.
3. In addition to practical difficulties, it is also not ideal to conduct this individual risk assessment for each product, especially when no international MLs exist for certain raw materials.
4. The 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 and Europe, where MLs for food supplements have already been established.
5. We recommend extending the transitional period from 18 months to 24 months after the enactment of the amended legislation, as additional time is required for certain processes and discussions with vendors.

In light of the above, we respectfully urge the Centre for Food Safety to consider establishing MLs for food supplements based on scientific data and risk assessments. We hope the Government will take our concerns into account and incorporate our recommendations in any future revisions to the relevant regulations, ensuring they are aligned with industry needs and practical considerations.

Should you require any further information or discussion, please feel free to contact us. We appreciate your attention to this matter and look forward to your response.

Yours faithfully,

Secretariat

Hong Kong Health Food Association