

修訂  
《食物內防腐劑規例》的諮詢

Consultation on Amendment to  
Preservatives in Food Regulations

# 大綱

## Outline

- ✦ 背景
- ✦ **Background**
  
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- ✦ **Proposed amendments**
  
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# 背景

## Background

- ✦ 在香港，與食物安全有關的規則和規例大都納入《公眾衛生及市政條例》(第132章)。
- ✦ In Hong Kong, most food safety related rules and regulations are contained in the Public Health and Municipal Services Ordinance, Cap. 132

# 背景

## Background

- ✦ 該條例規定所供出售食物必須合乎衛生、無雜質和適合人類食用。
- ✦ The Ordinance stipulates that all food on sale must be wholesome, unadulterated and fit for human consumption

# 背景

## Background

- ✦ 在食物使用防腐劑和抗氧化劑，則受《食物內防腐劑規例》(第132BD章)管制。
- ✦ The control on the use of preservatives and antioxidants in food is governed by the Preservatives in food Regulations, Cap 132BD

# 背景

## Background

- ✦ 該規例訂明任何進口、為出售而製造或供出售的食物只可含有准許防腐劑或抗氧化劑，並列明其分量。
- ✦ The Regulations stipulate that any food being imported, manufactured for sale, or sold should only contain permitted preservatives or antioxidants and in the proportion specified.

# 背景

## Background

### ✦ 該規例界定“防腐劑”為

- “任何能抑制、減慢或遏止食物的發酵、發酸或其他變壞過程或能掩蓋食物腐爛徵狀的物質”

### ✦ “Preservatives” is defined as

- “any substance which is capable of inhibiting, retarding or arresting the process of fermentation, acidification or other deterioration of food or of masking any of the evidence of putrefaction”

# 背景

## Background

- ✦ “抗氧化劑”則界定為
  - “任何可延遲、減慢或防止食物因氧化作用而發出酸敗氣味或味道變壞的物質”。
- ✦ “Antioxidant” is defined as
  - “Any substance which delays, retards or prevents the development in food of rancidity or other flavour deterioration due to oxidation



# 背景

## Background

《食物內防腐劑規例》(第132BD章)

Preservatives in Food Regulations, Cap 132BD

- ✦ 附表1第I部 - 12種准許防腐劑和91種指明食物
- ✦ Part I of the First Schedule - 12 permitted preservatives and 91 specified foods

# 背景

## Background

### 《食物內防腐劑規例》(第132BD章) Preservatives in Food Regulations, Cap 132BD

- ✦ 附表1第II部 – 7種准許抗氧化劑和8種指明食物
- ✦ Part II of the First Schedule - 7 permitted antioxidants and 8 specified foods

# 背景

## Background

- ✦ 使用食物防腐劑和抗氧化劑的條件:
- ✦ Conditions of use of preservatives and antioxidants
  - 通過國際機構的嚴格安全評估，建議使用量不會危害消費者的健康
  - Have undergone stringent evaluation by international authorities and proved to present no hazard to the health at the level of use proposed

# 背景

## Background

- ✦ 使用食物防腐劑和抗氧化劑的條件:
- ✦ Conditions of use of preservatives and antioxidants
  - 技術上有合理需要使用
  - A reasonable technological need can be demonstrated
  - 不應誤導消費者
  - Should not mislead consumers

# 背景

## Background

- ✦ 使用食物防腐劑和抗氧化劑的條件
- ✦ Conditions of use of preservatives and antioxidants
  - 經濟和技術上沒有其他辦法達到防腐和抗氧化的目的
  - The purpose cannot be achieved by other means which are economically or technologically practicable

# 《食品添加劑通用標準》

## General Standards on Food Additives

- ✦ 國際標準 - 食品法典委員會(Codex Alimentarius Commission)的《食品添加劑通用標準》
- ✦ International standard – Codex General Standards on Food Additives (GSFA)

# 《食品添加劑通用標準》

## General Standards on Food Additives

- ✦ 涵蓋的添加劑已經糧食及農業組織 / 世界衛生組織聯合食物添加劑專家委員會評估，證明可在食物中使用。
- ✦ The additives have been evaluated by JECFA and are found acceptable for use in food

# 《食品添加劑通用標準》

## General Standards on Food Additives

- ✦ 訂明這些添加劑在各類食物的准許用量，用以確保攝入量不超逾安全參照標準值。
- ✦ Their permitted levels of use in various foods ensure that the intake of these additives does not exceed the safety reference value



# 《食品添加劑通用標準》

## General Standards on Food Additives

現行規例尚未與國際標準一致的主要地方：

**Major areas of the Regulations that are not in line with other national or international standards**

- ✦ 抗氧化劑並未包括防止食物因氧化而變色的添加劑
- ✦ Antioxidants under the Regulations do not include those additives which protect foodstuffs against colour changes caused by oxidation

# 《食品添加劑通用標準》

## General Standards on Food Additives

現行規例尚未與國際標準一致的主要地方：

**Major areas of the Regulations that are not in line with other national or international standards**

- ✦ 並未把類似的指明食物歸納為主要食物類別；
- ✦ Similar specified foods are not grouped together to form major food categories
- ✦ 沒有考慮到添加劑的多功能特性
- ✦ do not acknowledge the multifunctional property of additives

# 《食品添加劑通用標準》

## General Standards on Food Additives

現行規例尚未與國際標準一致的主要地方：

**Major areas of the Regulations that are not in line with other national or international standards**

- ✦ 並未包括經專家委員會證實安全、並已列入食品法典委員會標準的一些常見防腐劑和抗氧化劑。
- ✦ Some common preservatives and antioxidants which were proven safe by JECFA and included in Codex's standards are not included in the Regulations

# 建議修訂

## Proposed amendments

- (1) 修訂防腐劑和抗氧化劑的定義，以配合食品法典委員會文件載述的相關定義

Amendment of the definitions of preservatives and antioxidants

- (2) 設立食品分類系統

Introduction of a food category system

# 建議修訂

## Proposed amendments

- (3) 合併該規例附表1的第I部和第II部，以整合防腐劑和抗氧化劑的一覽表

Combining Part I and Part II of the First Schedule to the Regulations

- (4) 把食品添加劑通用標準所列的防腐劑和抗氧化劑及其准許使用量納入該規例

Amalgamation of the preservatives and antioxidants in GSFA with the in the regulations

# 建議修訂

## Proposed amendments

### 食品分類系統

#### Food category system

- ✦ 反映國際的立法趨勢，即從針對指定產品的方式，轉為以食物類別為主導，針對所有食物類別。
- ✦ Reflects the international trend of moving away from “product-specific” legislation to horizontal provisions aimed at all food types.

# 建議修訂

## Proposed amendments

### 食品分類系統

#### Food category system

- ✦ 新系統較易為人明白，並為使用防腐劑和抗氧化劑的人士提供更清晰的指引
- ✦ The new system is easier to understand

# 建議修訂

## Proposed amendments

### 食品分類系統

#### Food category system

- ✦ 預計日後將會有更多國家採用《食品添加劑通用標準》的食品分類系統。
- ✦ It is expected that more countries will adopt the food category system of GSFA in the years to come.



# 建議修訂

## Proposed amendments

### 食品分類系統

#### Food category system

- ✦ 現行《食物內防腐劑規例》內有些食物是本地獨有的，食品法典委員會的食物分類未必設有有關類別，所以可能需要另訂新的類別，以涵蓋這些食物
- ✦ As certain food items in the Regulations are unique to the local setting and may not fit the relevant Codex food category system, new food groups will need to be created to accommodate these food items

# 食品分類系統

## Food Category System

- ✿ 01.0 乳及乳製品 (Milk and dairy-based drinks)
- ✿ 02.0 脂肪，油和乳化脂肪製品 (Fats and oils, and fat emulsions)
- ✿ 03.0 食用冰（冰棍、冰糕） (Edible ices, incl. sherbet and sorbet)
- ✿ 04.0 水果和蔬菜 (Fruits and vegetables)
- ✿ 05.0 糖果 (Confectionery)
- ✿ 06.0 谷物和谷物製品 (Cereals and cereal products)
- ✿ 07.0 焙烤製品 (Bakery wares)
- ✿ 08.0 肉和肉製品 (Meat and meat products)
- ✿ 09.0 水產及水產製品 (Fish and fish products)
- ✿ 10.0 蛋及蛋製品 (Eggs and egg products)
- ✿ 11.0 甜味素（食糖、蜂蜜） (Sweeteners, incl. honey)
- ✿ 12.0 調味品（鹽、香料、醬油） (Salts, spices, soups, sauces, etc.)
- ✿ 14.0 飲料 (Beverages)
- ✿ 15.0 即食小食品 (Ready-to-eat savouries)

# 食品分類系統

## Food Category System

- 01.0 乳製品及其類似品(不包括食物類別 02.0 所涵蓋的食物)
  - 01.1 奶及奶類飲品
    - 01.1.1 奶及酪乳(原味)
      - 01.1.1.1 奶(原味)
      - 01.1.1.2 酪乳(原味)
    - 01.1.2 調味及／或發酵奶類飲品(例如巧克力奶、可可飲品、蛋奶酒、酸乳酪飲品、乳清類飲品)
  - 01.2 發酵及加入凝乳酶的奶類製品(原味) (不包括食物分類 01.1.2(奶類飲品)所涵蓋的食物)
    - 01.2.1 發酵奶(原味)
      - 01.2.1.1 發酵後未經熱處理的發酵奶(原味)
      - 01.2.1.2 發酵後經熱處理的發酵奶(原味)
    - 01.2.2 加入凝乳酶的奶(原味)
  - 01.3 煉奶及其類似品(原味)
    - 01.3.1 煉奶(原味)
    - 01.3.2 奶精
  - 01.4 忌廉(原味)及其類似品
    - 01.4.1 經巴士德消毒的忌廉(原味)
    - 01.4.2 消毒忌廉、經超高溫處理的忌廉、攪用忌廉及已攪忌廉，以及低脂忌廉(原味)
    - 01.4.3 凝塊忌廉(原味)
    - 01.4.4 忌廉類似品
  - 01.5 奶粉和忌廉粉及其類似品(原味)
    - 01.5.1 奶粉和忌廉粉(原味)
    - 01.5.2 奶粉和忌廉粉類似品

# 建議修訂

## Proposed amendments

### 可供選擇的防腐劑和抗氧化劑

### Choice of preservatives and antioxidants

- ✦ 建議的修訂讓業界有更多防腐劑和抗氧化劑可供選擇（共有11種，詳列於諮詢文件）
- ✦ The proposed amendments will allow the trade to use a much wider choice of preservatives and antioxidants (11 in total, details available in consultation document)

# 建議修訂

## Proposed amendments

### 可供選擇的防腐劑和抗氧化劑

### Choice of preservatives and antioxidants

- ✦ 這些防腐劑和抗氧化劑全都經專家委員會評估，證明可在食物中安全使用，而且大都被發達國家允許使用於食物上
- ✦ The preservatives and antioxidants have been evaluated by JECFA and are found acceptable for use in foods. They are also allowed to be used in many developed countries

# 建議的修訂規例准許在食物中使用的其他防腐劑及抗氧化劑

## Additional preservatives and antioxidants permitted for food use in the proposed amendment

- ✿ 愈瘡樹脂 (Guaiac resin)
- ✿ 檸檬酸異丙酯 (Isopropyl Citrates)
- ✿ 氯化亞錫 (Stannous Chloride)
- ✿ 特丁基對苯二酚 (TBHQ)
- ✿ 硫代二丙酸鹽 (Thiodipropionates)
- ✿ 焦碳酸二甲酯 (DMDC)
- ✿ 葡萄糖酸亞鐵 (Ferrous Gluconate)
- ✿ 甲酸鹽 (Formates)
- ✿ 六亞甲基四胺 (Hexamethylene Tetramine)
- ✿ 溶菌酶 (Lysozyme)
- ✿ 游霉素 (Pimaricin)

# 建議修訂的法例和現行法例比較（初步）

## Preliminary comparison of proposed amendment and the Regulations

<p>建議修訂的法例</p> <p>容許較多防腐劑選用</p> <p>容許個別防腐劑有較高使用量</p>	<p>70多種</p>
<p><b>Proposed amendment</b></p> <p><b>Allow more preservatives and antioxidants to choose</b></p> <p><b>Allow a higher maximum level</b></p>	<p><b>Some 70 items</b></p>

## Dried fruit (04.1.2.2) 乾果

210-213 <sup>+</sup>	Benzoic acid 苯甲酸 <sup>+</sup>	800 <sup>+</sup>	mg/kg <sup>+</sup>	<sup>+</sup>	<sup>+</sup>
385, 386 <sup>+</sup> (note 9) <sup>+</sup>	EDTAs → 乙二胺四乙酸 <sup>+</sup>	265 <sup>+</sup>	mg/kg <sup>+</sup>	<sup>+</sup>	<sup>+</sup>
220-228, 539 (note 10) <sup>+</sup>	Sulphur dioxide <sup>+</sup> 二氧化硫 <sup>+</sup>	1000 <sup>+</sup>	mg/kg <sup>+</sup>	<sup>+</sup>	乾果類 <sup>+</sup> Item 20 <sup>+</sup> Figs, dried (2000ppm) <sup>+</sup> <sup>+</sup> Item 32 <sup>+</sup> Fruit, dried, other than prunes or figs (2000ppm) <sup>+</sup> <sup>+</sup> Item 69 <sup>+</sup> Prunes (2000ppm) <sup>+</sup>

- 容許較多防腐劑選用
- Allow more preservatives and antioxidants to choose



4.16 → → Vegetables (including mushrooms and fungi, roots and tubers, pulses and legumes, and aloe vera) and seaweeds in vinegar, oil, brine, or soy sauce (04.2.2.3) →

醋、油、鹽或醬油醃製的蔬菜 →

↕	210-213 ↕	Benzoic acid ↕ 苯甲酸 ↕	2000 ↕	mg/kg ↕	↕	醃製食物 ↕ Item 57 ↕ Olives, pickle (250) ↕ ↕ Item 61 ↕ Pickles, other than pickled olive (250) ↕
↕	385, 386 (Note 9) ↕	EDTAs 乙二胺四乙酸 ↕	250 ↕	mg/kg ↕	↕	↕
↕	220-228, 539 (note 10) ↕	Sulphur dioxide ↕ 二氧化硫 ↕	100 ↕	mg/kg ↕	↕	Item 57 (100) ↕ ↕ Item 61 ↕ Pickles, other than pickled olives (100) ↕
↕	200-203 ↕	Sorbic acid (except olives) ↕ 山梨酸 ↕	↕	mg/kg ↕	↕	Item 61 ↕ Pickles, other than pickled olives (1000) ↕

- 容許個別防腐劑有較高使用量
- Allow a higher maximum level

# 建議修訂的法例和現行法例比較（初步）

## Preliminary comparison of proposed amendment and the Regulations

<p>建議修訂的法例</p> <p>限制個別防腐劑的使用量較現行法例低</p>	<p>30多種</p>
<p><b>Proposed amendment</b></p> <p><b>Lower permitted levels in some specified food</b></p>	<p><b>Some 30 items</b></p>

## Dried fruit (04.1.2.2) 乾果

210-213	Benzoic acid 苯甲酸	800	mg/kg		
385, 386 (note 9)	EDTAs → 乙二胺四乙酸	265	mg/kg		
220-228, 539 (note 10)	Sulphur dioxide 二氧化硫	1000	mg/kg		<p>乾果類</p> <p>Item 20 Figs, dried (2000ppm)</p> <p>Item 32 Fruit, dried, other than prunes or figs (2000ppm)</p> <p>Item 69 Prunes (2000ppm)</p>

- 限制個別防腐劑的使用量較現行法例低
- Lower permitted levels in some specified food

# 建議修訂

## Proposed amendments

- ✦ 根據我們初步估計，《食品添加劑通用標準》有約70多種指明食物比現行《食物內防腐劑規例》內所訂定的防腐劑使用量為寬鬆，而比較嚴謹的約有30種指明食物。
- ✦ Our preliminary assessment showed that the permitted levels of preservatives in about 70 specified products are laxer under the GSFA, compared with the current Regulations. The number of specified products with a tighter permitted levels in GSFA is around 30.

# 建議修訂

## Proposed amendments

- ✦ 如《食品添加劑通用標準》與現行《食物內防腐劑規例》訂明的准許使用量有差別，則考慮採用《食品添加劑通用標準》列明的准許使用量(除非有強烈理據須採用另一標準)，使香港與國際的標準一致。
- ✦ If there are discrepancies of permitted levels between GSFA and the existing Regulations, the ones listed in the GSFA will be considered for the sake of harmonization of local and international standards, unless there are strong justifications to adopt a different standard.

# 建議修訂

## Proposed amendments

### 其望建議修訂可達致的效果

## Expected outcomes of the proposed amendments

- ✦ 根據國際認可的食物風險評估和管理準則，繼續保障公眾健康
- ✦ Public health would continue to be protected at a level which could be justified against internationally recognised risk assessment and management yardsticks

# 建議修訂

## Proposed amendments

### 其望建議修訂可達致的效果

## Expected outcomes of the proposed amendments

- ✦ 令消費者對食物安全更有信心
- ✦ Consumer confidence in food safety would be enhanced by the amendment

# 建議修訂

## Proposed amendments

### 其望建議修訂可達致的效果

## Expected outcomes of the proposed amendments

- ✦ 防腐劑和抗氧化劑的監管規定，符合食品法典委員會所採納的標準
- ✦ Regulation of preservatives and antioxidants would be enhanced by the amendment



# 建議修訂

## Proposed amendments

### 其望建議修訂可達致的效果

## Expected outcomes of the proposed amendments

- ✦ 有關人士會發現經修訂的規例更清晰易明
- ✦ Stakeholders will find the amended regulations more user friendly

# 徵詢意見

## Views sought

- ✦ 是否贊成按照建議修訂防腐劑和抗氧化劑的定義，以便與食品法典委員會的定義(國際標準)一致？如果贊成，請問是否同意提出的定義？
- ✦ Do you agree with the proposal to amend the definitions of preservatives and antioxidants to be in line with Codex definition, the international standards, and, if yes, do you agree with the proposed definitions?

# 徵詢意見

## Views sought

- ✦ 是否贊成按照建議把《添加劑標準》涵蓋的防腐劑和抗氧化劑納入該規例，讓食物業界可採用更多安全的防腐劑和抗氧化劑？
- ✦ Do you agree with the proposal to amalgamate the preservatives and antioxidants in GSFA with those on the Regulations so that the food trade can have a wider choice of safe preservatives and antioxidants at their disposal?

# 徵詢意見

## Views sought

- ✦ 是否贊成按照建議合併該規例附表1的第I和第II部，以簡化法律規定？
- ✦ Do you agree with the proposal to combine Part I and Part II of the First Schedule to the Regulations to simplify the legal requirements?

# 徵詢意見

## Views sought

- ✦ 是否贊成按照建議設立更清晰易明的食物分類系統？
- ✦ Do you agree with the introduction of a food category system for more user-friendly categorization of food?

# 徵詢意見

## Views sought

✦ 歡迎你以書信、傳真或電郵方式向食物安全中心提出意見

✦ You are welcome to send your views and comments by letter, facsimile or email to the Centre for Food Safety

# 徵詢意見

## Views sought

食物安全中心

Centre for Food Safety

(經辦人：風險評估組主管)

(Attn: Risk Assessment Section)

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查詢電話號碼 Enquiry tel. no.: 2867 5699

# 徵詢意見

## Views sought

- ✦ 諮詢期至二零零七年二月二十八日
- ✦ The consultation period will last till 28 February 2007
- ✦ 我們在擬定食物內防腐劑的最終修訂建議前，定會充分考慮收到的意見。
- ✦ We will take full account of the views received before finalising the proposed amendments to the Preservatives in food Regulations



謝謝

Thank you