



香港社會醫學學院
HONG KONG COLLEGE OF COMMUNITY MEDICINE
founder College of the Hong Kong Academy of Medicine
Incorporated with limited liability



Tel: 2871 8844

Fax: 2580 7071

E-mail: hkccm@hkam.org.hk

By Post and Email

COUNCIL 2007-08

Food Branch, Food and Health Bureau
Government Secretariat
20/F, Murray Building
Garden Road
Hong Kong

President

Dr Kathleen So
蘇碧嫻

Vice-President

Dr S P Mak
麥倩屏

26 March 2008

Dear Sir / Madam,

Chief Censor

Dr T H Leung
梁挺雄

Consultation on Proposed Food Safety Bill

On behalf of the Hong Kong College of Community Medicine (the College), I would like to submit our comments on the proposed Food Safety Bill.

Honorary Secretary

Dr Thomas Chung
鍾偉雄

As a professional organisation consisting of specialist doctors working to improve the health of the community, the College welcomes and supports the proposal on formulation of a Food Safety Bill which is a positive move to tighten up the control of food safety and better protect the health of people in Hong Kong.

Honorary Treasurer

Dr S V Lo
羅思偉

Food safety is a very important public health subject as well as an issue with great consumer interest. However, it is noted that there are gaps and problems in the existing regulatory framework which hinder prompt introduction of stringent control measure to tackle food problems effectively. The food incidents in recent years have exposed inadequacies of the current food law which needs urgent revamp. We would also like to provide comments on specific areas of the proposal as follows:

Members

Dr Fung Hong
馮康

Dr Mandy Ho
何孟儀

Dr William Ho
何兆煒

Definition of Food

The proposal to broaden the definition of "food" to cover live fish, live amphibian as well as ice is agreeable. However, other items which could be taken as food e.g. other live animals or live birds, but are not caught by the existing food law should also be included.

Dr Ronald Lam
林文健

Prof Gabriel Leung
梁卓偉

Dr P Y Leung
梁柏賢

Mandatory Registration Scheme of Food Importers and Distributors

The College considers it acceptable to require mandatory registration of food importers and distributors which is a common practice in most overseas



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authorities. It is especially important and relevant to Hong Kong which very much relies on imported food.

President

Dr Kathleen So
蘇碧嫻

Record Keeping

The College considers that it would be useful to require record keeping by the trade to facilitate tracing of problematic food. However, it is important to have a system in place to monitor and validate the proper record keeping.

Vice-President

Dr S P Mak
麥倩屏

Specific Import Control

The College agrees with the proposed strengthening of import control by requiring more food to be subjected to tightened regulation according to their risk level. To strike a balance, it is considered appropriate to adopt an incremental approach by controlling food with high potential health risk initially while reserving power for the authority to extend control measures to other food types should there be change in circumstances.

Chief Censor

Dr T H Leung
梁挺雄

Honorary Secretary

Dr Thomas Chung
鍾偉雄

Prohibition of Import and Sale and Food Recall

The College agrees that the authority be empowered to prohibit the import or sale of, and order a mandatory recall of problematic food if there are reasonable grounds to believe that the food concerned poses a serious health hazard to the public, which could facilitate prompt intervention to better protect the public.

Honorary Treasurer

Dr S V Lo
羅思偉

Members

Dr Fung Hong
馮康

Food Safety Appeals Board

Dr Mandy Ho
何孟儀

The College considers it reasonable to set up a Food Safety Appeals Board. However, the procedures and arrangement should not undermine the prompt implementation of public health intervention.

Dr William Ho
何兆煒

Local Primary Production

Dr Ronald Lam
林文健

The College considers it sensible to introduce similar control measures to local primary produce. However, there should be clear delineation of enforcement authorities to ensure that the local primary produce are subject to the same strengthened control and meet the same level of safety standards.

Prof Gabriel Leung
梁卓偉

Dr P Y Leung
梁柏賢

Last but not the least, there should be sufficient sanction in the legislation to deter violation of statutory regulation.

The College considers the overall proposal reasonable and in the right



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direction. We look forward to seeing more details of the regulatory framework under the Food Safety Bill soon.

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President

Dr Kathleen So
蘇碧嫻

Yours faithfully

Vice-President

Dr S P Mak
麥倩屏

Dr Thomas Chung
Hon. Secretary

Hong Kong College of Community Medicine

Chief Censor

Dr T H Leung
梁挺雄

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鍾偉雄

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