



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



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COUNCIL 2007-08

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Centre for Food Safety
(Attn: Risk Assessment Section)
Food and Environmental Hygiene Department
43/F, Queensway Government Offices,
66 Queensway,
Hong Kong

31 January 2008

Dear Sir / Madam,

**Public Consultation on Proposed Regulatory Framework
for Pesticide Residues in Food in Hong Kong**

On behalf of the Hong Kong College of Community Medicine (the College), I would like to submit our comments on the Proposed Regulatory Framework for Pesticide Residues in Food in Hong Kong.

As a professional organisation consisting of all specialist doctors working to improve the health of the community, the College welcomes and supports the proposed regulatory framework which aims to better protect public health, facilitate effective regulatory control of pesticides in food and promote harmonization between local and international standards.

The control of pesticides in food is a very important public health issue. The use of pesticides has become a common agricultural practice in protecting the growth of crop. Application of these chemicals on one hand could be beneficial to public health as uncontrolled fungi, insects and other pests can contaminate crops with natural toxins and harmful microorganisms, but on the other hand, the improper use of pesticides will adversely affect the health of the general public who consume the food crop with excessive pesticide residues.

The College noted that the proposed regulatory framework will follow the Codex definitions of "pesticides" and related terms and adopt Codex's classification of foods. The maximum residue limits (MRLs) and extraneous maximum residue limits (EMRLs) of individual pesticides recommended by Codex will be adopted as the backbone and supplemented by related standards of the Mainland and other major exporting countries of food to Hong Kong. It is also mentioned that risk assessment studies will be conducted using internationally accepted methods to assess whether the



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proposed MRLs and EMRLs are adequate to protect public health in the local setting.

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The College considers the proposal which aims to align the regulatory framework with relevant international standards supplementing with risk assessments reasonable.

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Yours faithfully

Dr Thomas Chung
Hon. Secretary
Hong Kong College of Community
Medicine