



**Submission Re "Legislative Proposals on Regulation of Edible Fats and Oils and Recycling of "Waste Cooking Oils"" by WNHK**

to: edible\_oils@fehd.gov.hk

5/10/2015 18:36

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From:

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Submission in Response to Legislative Proposals on Regulation of Edible ....pdf

Dear Sir/ Madam,

In response to the public consultation on the "Legislative Proposals on Regulation of Edible Fats and Oils and Recycling of "Waste Cooking Oils"", I would like to make a submission as attached on behalf of Wyeth Nutrition Hong Kong. The hard copy of the submission will also be posted to the Centre for Food Safety (Centre) in the meanwhile.

We hope that our views will be taken into positive consideration by the Centre. Should you have any question, please do not hesitate to contact us. Thank you for your attention!

Regards,

**Veronica Sze**

Associate Director, Public Affairs and Communications

**Wyeth** | Nutrition

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Centre for Food Safety  
Food and Environmental Hygiene Department  
43/F, Queensway Government Offices,  
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Hong Kong

**SUBMISSIONS IN RESPONSE TO PUBLIC CONSULTATION OF**

**“Legislative Proposals on Regulation of Edible Fats and Oils  
and Recycling of “Waste Cooking Oils””**

In response to the Consultation Document of Legislative Proposals on Regulation of Edible Fats and Oils and Recycling of “Waste Cooking Oils” (“Legislative Proposals”) released in July 2015, Wyeth (Hong Kong) Holding Company Limited (“Wyeth Nutrition Hong Kong”), a leading nutrition company in Hong Kong supplying quality nutrition products, would like to put forward our views regarding clarification of products covered in the Legislative Proposals in this submission for the Centre for Food Safety (“CFS”)’s consideration.

Wyeth Nutrition Hong Kong understands from the Legislative Proposals that the proposed regulatory control focuses on the safety of “Edible Fats and Oils”, which is defined as *“food which is in a state for human consumption and is composed of glycerides of fatty acids derived from any plant or animal or bird or fish. They may contain small amounts of other lipids such as phosphatides, of unsaponifiable constituents and of free fatty acids naturally present in the fat or oil”* (Section 4.6 of the Consultation Document).

Nevertheless, despite the above specifications as well as the examples of products that will be covered in and excluded from the proposed regulatory regime provided in the Section 4.8 of the Consultation Document, it is noticed that there is still some uncertain areas regarding the coverage of products for the upcoming regulation which include:

- Compounded food which contains animal or vegetable fats or oils, such as milk powder
- Health supplements which contain animal or vegetable fats or oils, such as algae oil capsules

In view of the above uncertainty, we initiated a discussion with CFS to further clarify the primary intention of the Legislative Proposals. Based on the feedback from CFS, we understand that the regulatory focus of the Legislative Proposals is on “edible fats and oil generally used in the preparation of food, such as fats and oils used for cooking and frying, table oils or salad oils” (taking reference to Section 4.7 of the Consultation Document). To avoid similar doubts among the Trade, we would like to recommend CFS to explicitly specify the abovementioned product categories in the list of products to be excluded from the regulatory regime in its ultimate legislation.

To conclude, Wyeth Nutrition Hong Kong is looking forward to a clear and certain regulatory regime in the near future which can facilitate the Trade’s compliance as well as the effective regulation by the Government. We will be very grateful if CFS would take our recommendations into positive consideration and we welcome any opportunity to work with CFS for a suitable regulation for the benefits of consumers in Hong Kong.

Wyeth (Hong Kong) Holding Company Limited  
5 October 2015