



Comments on the Proposed Amendments to the Food Adulteration (Metallic Contamination) Regulation  
to: metal\_consultation@fehd.gov.hk  
1/8/2017 11:48

From:  
To: "metal\_consultation@fehd.gov.hk" <metal\_consultation@fehd.gov.hk>

1 Attachment



Comments on the Proposed Amendments to the Food Adulteration (Metallic Contamination) Regulation.pdf

Dear Sir/Madam,

Attached letter on Comments on the Proposed Amendments to the Food Adulteration (Metallic Contamination) Regulation is for your kind handling.  
Thank you for your attention.

*Best regards,*

Senior Executive Officer – Management Office  
CMA Testing and Certification Laboratories



**CMA Testing  
and Certification  
Laboratories**  
廠商會檢定中心

31 July, 2017

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Food and Environmental Hygiene Department  
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Dear Sir/Madam,

**Comments on the Proposed Amendments to  
the Food Adulteration (Metallic Contamination) Regulations**

CMA Testing and Certification Laboratories supports Hong Kong government to strengthen her metallic contamination control in food by amending the existing Food Adulteration (Metallic Contamination) Regulations. On the other hand, we would like to provide some suggestions to improve the proposed amendments.

1. Many health food products (e.g. dietary supplements) sold in Hong Kong fall into the definition of general food products. However, there are no specific harmful substance (including heavy metal) limits set for these food products. Since **more people are consuming health food products nowadays**, CFS is **recommended to set maximum limits (MLs) of heavy metals exclusively for health food products which cannot be classified as Chinese medicine or western medicine, to protect public health.**
2. The proposed ML of cadmium in crustaceans is 2 mg/kg, which is more lax than the legal limits adopted in EU and China (0.5 mg/kg). Given that **Hong Kong citizens consume huge amount of seafood including crustaceans every year, and the problems of global marine pollution & thereby seafood safety are of growing concern**, CFS is **recommended to adopt a more stringent ML of cadmium for seafood than Codex, and adherence with international practices.**

CMA Industrial Development Foundation Limited

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3. The proposed amendments shall make reference to the Codex's classification of food. Same approach has already been used for "Pesticide Residues in Food Regulation". However, **Codex has adopted different food classification systems for pesticide residues, contaminants & toxins, and additives** which can make the interpretation of a food category complicated and/or even contradictory. **To facilitate the trade in identifying the appropriate food category and relevant food safety limit, CFS is recommended to establish a single food classification system.**
  
4. **Food categorization of Codex is so scientific that the trade and the general public might not be able to understand** e.g. differences between bulb vegetables and brassica vegetables. Just like the HK Pesticide MRL database, CFS is **recommended to establish a HK Metallic Contaminant ML Database, showing examples of food commodities commonly sold in Hong Kong under each food group, to facilitate the trade and the general public in finding the appropriate MLs for specific food commodities.**

Yours sincerely,

CMA Testing and Certification Laboratories

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