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From:
To: <metal_consultation@tehd.gov.hk>

1 Attachment



HKCCM Response - Proposed Amendments to the Food Adulteration (Metallic ...pdf

Dear Mr Chu,

Attached please find our response for your information.

Regards,

Exe:

Hong Kong College of Community Medicine

Disclaimer



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 2017-18

Miss LAU Lee Kwan, Vivian, JP
Director of Food and Environmental Hygiene

President

Prof Fung Hong
馮康

5 September, 2017

Vice-President

Dr Thomas Tsang
曾浩輝

Dear Miss Lau,

Proposed Amendments to the Food Adulteration (Metallic Contamination) Regulations - Public Consultation

Chief Censor

Dr Y Y Ho
何玉賢

Thank you for your email of 25 August 2017. On behalf of the Hong Kong College of Community Medicine (the College), I would like to submit our views and comments on the captioned consultation paper (the Paper).

Honorary Secretary

Dr Jackie Leung
梁靜勤

Honorary Treasurer

Dr Mandy Ho
何孟儀

Members

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Dr Nancy Tung
董秀英

Dr Y K Wan
溫遠光

Prof Samuel Wong
黃仰山

The College welcomes the Government's proposal to update and amend the Food Adulteration (Metallic Contamination) Regulations (Cap. 132V) (the Regulations). We support the general principles of harmonizing local food standards with international ones, namely Codex standards, while at the same time adopting a science-based approach, taking into consideration local food consumption pattern and risk assessment results.

We agree with the approach to replace the existing food categories of "all food in solid/liquid form" with specific Maximum Limits targeting individual food/ specific food groups of significant dietary exposure. This will allow more focused regulation based on risk, while public health would be safeguarded.

We also support the updating of the food descriptions and nomenclatures in the Regulations, as well as incorporating the interpretation of Maximum Limits into the Regulations which should facilitate the trade to comply with the law.

Since the last major amendments to the Regulations were made in 1983, the current proposal should bring much improvement in terms of safeguarding food safety in Hong Kong and harmonization of local and international standards.



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Yours sincerely,