



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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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.

**COUNCIL 2007-08**

***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

***Honorary Secretary***

Dr Thomas Chung  
鍾偉雄

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