

LETTERHEAD OF ADVANCE FEED CO., LTD.

October 6, 2001

Legislative Council

Subject: Comments on Public Health (Animal and Birds)
(Chemical Residues) Regulation and Harmful
Substances in Food (Amendment) Regulation 2001

The proposed new regulation is necessary and welcomed. This regulation will benefit the public, the animal producers and the related industries.

General Comment : Drugs and Chemicals and their Maximum Residue Limits (MRL)

1. The new regulation controls drugs and chemical residue limits in tissue of food animals and milk only. Eggs are not included in this regulation. Though there is no egg production in Hong Kong, we are consuming millions of eggs each day. Maximum Residue Limits for eggs should be set up as soon as possible. It will also benefit all of us in Hong Kong if quality standards are set up for eggs so that they can be graded according to their sizes, freshness, internal and external qualities.

Comments on The LC Brief, paragraph 10, "We will provide training to farmers and traders to facilitate compliance with the controls."

1. Training should be provided to farmers, traders, feed manufacturers, feed and animal health product suppliers. The successful enforcement of this regulation relies heavily on the cooperation and knowledge of all those involved.

2. Training should include instructions and guidelines on the use of drugs and chemicals of which MRL are listed. Farmers and feed manufacturers should be given each drug's recommended dosage and their withdrawal periods so they know how to apply them correctly.
3. Because of the shortage of Registered Veterinary Surgeon working in the field of commercial animal production, the Agriculture, Fisheries and Conservation Department should hire a full time veterinary specialized in the field of animal production to help farmers to work out medication programs for disease prevention and treatment in case of disease outbreak. Regular seminars on health care should be held 3-4 times a year. Easy access to this professional service will definitely facilitate compliance with the controls.
4. Under paragraph 19(a) of the LC Brief, \$4 million has been earmarked to the AFCD for recurrent expenses including three additional staff. If the above suggestions create additional expenses not included in this \$4 million, more fund should be allocated to the AFCD to provide these services as the overall and long term costs should be lower if the industry knows how to comply with the controls.

Comments on Public Health (Animals and Birds) (Chemical Residues) Regulation page 6, paragraph 8 and 9.

1. When any food animal accompanied by a valid certificate issued by a competent veterinary authority of the exporting origin, after analysis, found to contain a prohibited chemical, the Director of AFCD not only should make a suspension order to suspend that farmer, or trader from supplying for a period of time, but should also question the reliability of the certificates issued by such authority. Under such circumstance, all food animal coming from such exporting origin should be held in storage until analysis proves that they can be released into the market.
2. Foreign veterinary authority can issue health certificates for their food animal and feed exporters, the AFCD should also be given such authorization to issue similar certificates so Hong Kong producers can produced such certificates when being asked by the importing country.

Comments on responsibilities of feed manufacturers and suppliers

Under the new regulation paragraph 13, feed supplier can supply feeds with agricultural and veterinary chemical when they meet the labeling requirements. It is still not clear to the feed industry whether they also have to comply with the Pharmacy and Poisons Ordinance, Cap.138 which involves registration of feeds.

Suggestion:

- I. Since control of animal production and their final products is by the Agriculture, Fisheries and Conservation Department, control of feed manufacturing and the drugs and chemicals used in feeds should also be under the same department.
- II. Feed manufacturers should apply to the Director of AFCD for permits to import drugs or chemicals for veterinary use.
- III. If drug combinations in the feeds are those already recommended by the AFCD, no further approval is required as long as they meet the labeling requirements.
- IV. If new drug or drug combinations are to be used, the manufacturer or supplier should apply to the AFCD for the use of such drug or drug combination and the AFCD should reject or approve within 2 to 4 weeks. We can make such decisions quickly by referring to what has already been approved by the E.C. or the U.S.A.

With best regards,

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