

立法會
Legislative Council

LC Paper No. CB(2) 918/00-01
(These minutes have been seen by
the Administration)

Ref : CB2/PL/FE

LegCo Panel on Food Safety and Environmental Hygiene

Minutes of Meeting
held on Monday, 22 January 2001 at 8:30 am
in Conference Room A of the Legislative Council Building

Members Present : Hon Fred LI Wah-ming, JP (Chairman)
Hon Tommy CHEUNG Yu-yan, JP (Deputy Chairman)
Hon David CHU Yu-lin
Hon CHAN Yuen-han
Hon WONG Yung-kan
Hon Jasper TSANG Yok-sing, JP
Dr Hon YEUNG Sum
Hon YEUNG Yiu-chung
Hon LAU Kong-wah
Hon SZETO Wah
Hon LAW Chi-kwong, JP
Hon TAM Yiu-chung, GBS, JP
Hon Abraham SHEK Lai-him, JP
Hon Michael MAK Kwok-fung
Hon IP Kwok-him, JP

Members Absent : Hon Albert HO Chun-yan
Hon James TO Kun-sun
Hon SIN Chung-kai
Dr Hon LO Wing-lok
Hon WONG Sing-chi

Public Officers Attending : Items IV and V
Mr Paul TANG
Deputy Secretary for the Environment and Food

Mrs Rita LAU
Director of Food and Environmental Hygiene

Dr P Y LEUNG
Deputy Director (Food and Public Health)
Food and Environmental Hygiene Department

Mr W H CHEUK
Assistant Director (Headquarters)
Food and Environmental Hygiene Department

Clerk in Attendance : Mrs Constance LI
Chief Assistant Secretary (2)5

Staff in Attendance : Ms Joanne MAK
Senior Assistant Secretary (2)2

Action

I. Confirmation of minutes of the meeting held on 5 January 2001
(LC Paper No. CB(2) 705/00-01)

The minutes of the meeting held on 5 January 2001 were confirmed.

II. Date of next meeting and items for discussion
(LC Paper No. CB(2) 741/00-01 (01) and (02))

2. Members agreed to discuss the following items at the next meeting to be held on 26 February 2001 -

- (a) Sustainable development of the agriculture and fisheries industries as proposed by Mr WONG Yung-kan; and
- (b) Labelling system for genetically modified food as proposed by the Administration.

3. The Chairman informed members that the other item proposed by Mr WONG Yung-kan on "Control of local / imported food and live food animals" would be discussed at a future meeting.

Action

III. Information paper issued since last meeting

(LC Paper No. CB(2) 741/00-01 (03))

4. Members noted that the Administration had provided an information paper on "Relocation of the Yau Ma Tei Fruit Market" as requested by Mr James TO at the meeting on 5 January 2001.

IV. Briefing by the Administration on the Consultation Paper on the Inspection and Categorization of Food Establishments

(LC Paper No. CB(2) 757/00-01 (01) and (02))

5. Director of Food and Environmental Hygiene (DFEH) explained that the Consultation Paper was only tabled at this meeting because the Administration wanted to brief the Panel before releasing it for public consultation. She said that she would welcome a further meeting with the Panel after the briefing to discuss the Paper if members so wished.

6. Assistant Director (Headquarters) (AD(HQ)) of the Food and Environmental Hygiene Department (FEHD) gave a PowerPoint presentation on the Consultation Paper, highlighting the following four-pronged approach -

- (a) refocusing the existing inspection system to enhance its effectiveness (paragraphs 4.2 - 4.6 of the Paper);
- (b) introducing Hygiene Manager (HM) and Hygiene Supervisor (HS) requirements to strengthen food safety supervision in food establishments (paragraphs 4.7 - 4.10 of the Paper);
- (c) introducing a new Open Categorization Scheme to provide better information on the hygiene standard of food establishments (paragraphs 4.11 - 4.16 of the Paper); and
- (d) improving the Demerit Points System to promote greater incentives for food establishments to improve their hygiene conditions (paragraphs 4.17 - 4.25 of the Paper).

(Post-meeting note: The consultation Paper and the presentation materials were subsequently circulated to members vide LC Paper No. CB(2) 741/00-01 (03) and 757/00-01 (02).respectively)

Discussion

Action

7. Mr TAM Yiu-chung said that it was common practice for “siu mei” shops to display “siu mei” (or roast meat) at the front of the shops without cover in order to attract customers. However, such practice was currently in breach of the hygiene requirements. The shop operators considered that frequent inspection by Health Inspectors and the Demerit Points System would adversely affect their business. In view of the economic downturn in recent years, these operators hoped that the Administration would relax the requirements in this respect. Mr TAM asked how the Administration would address the issue.

8. DFEH explained that consistent enforcement was necessary and that from the hygiene point of view, roast meat must be placed in a properly covered showcase to protect it from contamination by dust and insects. She pointed out that as roast meat was “ready to serve”, it would pose health hazard if not placed in covered showcase. She believed that if all “siu mei” shops could adopt the practice of placing the roast meat in covered showcases, customers would get used to buying roast meat inside the shops instead of at the front of the shops. To ensure food safety, FEHD would continue to enforce the Demerit Points System in relation to displaying roast meat without cover at the front of shops. The licence of the operator would be suspended if 15 points were deducted. DFEH said that she hoped the trade would comply with the hygiene requirements which were necessary to ensure food safety. She added that any person who was aggrieved by a suspension of licence could appeal to DEFH who had discretion to review the case based on individual merits.

9. Mr TAM Yiu-chung said that many “siu mei” shop operators believed that it would be difficult for them to attract customers if the roast meat was not placed at the front of the shops. They would think that Government had no concern for their livelihood if Government remained steadfast in this respect. He suggested that Government should explore better ways to tackle the problem. On the Demerit Points System, Mr TAM expressed concern about the consistency of enforcement by different Health Inspectors. The Administration noted the comments.

10. Mr LAU Kong-wah commented that the Consultation Paper did not explain what problems had been found with the food hygiene and safety regulation system established by the two former provisional municipal councils (PMCs).

11. DFEH acknowledged the efforts and accomplishments made by PMCs in safeguarding public health and ensuring food safety. She said that this was evidenced by the high number of inspections (more than 480 000 inspections each year) made on food establishments in Hong Kong, as compared to overseas countries such as the United States and the United Kingdom where much less inspections were made on food premises. She said that inspections were often perceived in a negative way by the food trade in Hong Kong probably because prosecutions might follow after inspections. The Administration was now proposing to improve the inspection system to make clear the objectives of inspections in consultation with the trade.

Action

12. Referring to the proposed Open Categorization Scheme in paragraph 4.14(b) of the Paper, Mr LAU said that the hygiene standards under Option II for the grading of "Good", "Satisfactory" and "Ungraded" were unclear. DFEH responded that the Administration would listen to the views of the food trade and the public on the grading system before deciding which option would be adopted for the Open Categorisation Scheme. The hygiene standard for each grade would also be publicised to enhance transparency of the system.

13. Mr LAU further asked whether the grading under the proposed Open Categorization Scheme would have to be displayed in a prominent place in the food establishment, in addition to publication on the website of FEHD. DFEH advised that the Administration would propose to make it a licensing condition for licensees to display the grading or score at a suitable place of the food establishment.

14. Mr IP Kwok-him noted that while the long term goal was to promote self-regulation of the food trade, it would be necessary to balance the interests of the trade and the public and to enhance public understanding of the importance of food safety. Referring to paragraph 2.5 and Annex C of the Consultation Paper, he asked about the major inspection items under the proposed inspection system. He considered that the grading or score appeared to be too general for the public to understand. DFEH responded that the main objectives of the proposed inspection system were to ensure a high standard of environmental hygiene and food safety for food establishments. Health Inspectors would in future give more emphasis on the food safety aspects such as food temperature, food protection, food storage, food preparation and food handling as well as the personal hygiene of food handlers.

15. Noting that the Consultation Paper emphasized that consumers could play a role in monitoring the hygiene standard of the food establishment they patronized, Mr IP Kwok-him asked how consumers could actually contribute in this respect. AD(HQ) replied that the Administration now proposed more comprehensive inspections based on objective standards to be carried out and that there would be greater transparency of the inspection items. He said that the scoring system would be improved to enable the public to know the hygiene standard of food establishments. DFEH added that FEHD had been stepping up efforts to enhance public awareness of food safety by disseminating information through the FEHD's website and organising seminars on food safety and proper food handling.

16. Mr IP Kwok-him asked about the minor violations of certain insignificant hygiene requirements which were proposed to be removed from the Demerit Points System. DFEH responded that these trivial offences were those proposed for a "0" score in Annex C of the Consultation Paper. The Administration would welcome views of the trade on the proposal.

17. Dr YEUNG Sum asked what FEHD had learnt from the experience of implementing the "5-star" grading scheme and what specific improvements were to

Action

be made by the proposed Open Categorization Scheme. DFEH responded that the Administration had conducted an evaluation of the "5-star" grading scheme with the trade and Health Inspectors to identify shortcomings of the scheme. DFEH said that under the new Open Categorization Scheme, scores given to a food establishment by a Health Inspector would be reviewed by a senior FEHD officer and adequate training would be given to all relevant staff to ensure objectivity and consistency in the grading.

18. Dr YEUNG Sum asked about the staffing and financial implications given the increase in inspection time under the proposals. DFEH said that there would be re-arrangement of inspection work so that fewer routine inspections would be carried out with more thorough check each time. Any additional workload arising from new procedures of work would be absorbed by staff redeployment.

19. Mr LAU Kong-wah remarked that the Administration should find out if the high frequency of inspections conducted to food premises in Hong Kong reflected a poor hygiene standard as compared to other developed countries. Mr David CHU also asked whether Hong Kong was considered to have greater problems with food hygiene. He observed that many restaurants used open space for scullery and food/fruit storage, and some food shops did not put straws in properly sheltered area. He asked whether the Administration should take stringent enforcement action against such practices, and educate the public about food safety.

20. DEFH responded that the hygiene standard of Hong Kong was generally high and there was relatively low incidence of food incidents in food establishments. She said that the Administration would be prepared to discuss with the food trade if they had difficulties in complying with the hygiene and food safety requirements. Deputy Director (Food and Public Health) (DD(FPH)) added that there would be different handling requirements for low-risk food and high-risk food. He said that the Administration would continue its efforts in conducting risk assessments on food and enlisting the cooperation of the food trade and the community to reduce food risks. Mr David CHU requested the Administration to consider a longer grace period, or even an incentive scheme in order to encourage the trade to comply with the new requirements. The Administration noted the suggestion.

21. In response to Mr WONG Yung-kan, DFEH said that an appropriate licence was required for any food establishment, including one selling "lo mei" or "siu mei". The licensee must also comply with the licensing conditions in respect of ventilation as stipulated by the Environmental Protection Department. Responding to Mr WONG's further question, she added that specifications for toilets were included in the licensing conditions for food establishments. To strengthen food safety supervision in food establishments, the Paper proposed that food establishments should appoint HMs and/or HSs who would be required to attend training courses on food safety and hygiene conducted by approved institutions/FEHD.

Action

22. Mr Tommy CHEUNG asked whether the Administration would allow the trade to propose options concerning the new Open Categorization Scheme other than those set out in page 13 of the Consultation Paper. DFEH said that the Paper only set out the principles of the options and the Administration would welcome any views from the trade.

23. Mr YEUNG Yiu-chung asked whether the proposed HMs would be required to attend a minimum number of hours of training and whether they would be held responsible for any irregularities found with the food establishment under their supervision. DFEH replied that HMs had to attend a formal training course currently run by the seven tertiary education institutions. The Administration would keep a registration list of HMs who had satisfactorily completed the relevant training. The registration list would be made available for inspection by restaurant owners. DFEH said that a HM would serve as the contact person with FEHD. As regards whether a HM would be de-registered if irregularities were found with the food establishment for which he/she worked, DFEH replied that the Administration had not come to a decision and would seek the views of the trade.

24. Mr Tommy CHEUNG recalled that when the HM Scheme was first proposed in 1999, it had met opposition from the food trade. As a result, the proposal had been shelved and only a pilot HS scheme was introduced for food factories. He asked whether there was any difference between the present proposal and the one proposed by PMCs in 1999. He expressed concern that the proposal would have implications on the operating costs of the food trade and requested the Administration to provide an estimate on the additional costs and workload for training HMs and requiring six-monthly reports on food establishments. As there were about 1 800 to 2 000 food premises with more than 100 seats and they would be required to appoint a HM under the proposed scheme, he asked whether the tertiary education institutions could manage to train up adequate HMs.

25. DFEH replied that the Administration's plan was that the HMs and HSs were to be appointed from amongst the staff of the food establishments. She said that the tertiary education institutions could provide 4 000 training places each year and the course fee was around \$1,000. She added that the training for HSs provided by FEHD was free of charge. The Administration would welcome views from the food trade to fine-tune the implementation arrangements.

26. Mr Tommy CHEUNG commented that Annex A of the Paper gave a very wide range of duties of HMs, and it would take a lot of time of the HM to discharge all these duties. He requested the Administration to provide an estimate on the volume of work of a HM to enable the food trade to consider the costs. DFEH explained that the HMs and HSs were proposed for large food establishments and those producing or selling high-risk food. For other food establishments of a smaller scale, only HSs would need to be appointed.

Action

27. Mr Michael MAK expressed concern about measures to be taken by the Administration to implement the proposals and to ensure a consistent hygiene standard in all food establishments. In this connection, he pointed out that the sanitary conditions of toilets in many food premises were poor. DFEH said that the proposed HMs and HSs would have the duty to supervise their staff to adopt proper food handling and personal hygiene practices, and this would help improve the hygiene conditions of food establishments.

28. As HMs were employees of the food premises, Mr Michael MAK questioned whether they could really discharge their duties independently. DFEH said that the success of the proposal would depend on the support and cooperation of the food trade. The Administration would explain to the trade the importance of upgrading the hygiene conditions of food establishments and the positive impact on their business. The Chairman suggested that FEHD could make reference to the experience of the Safety Supervisor scheme launched by Labour Department.

29. Miss CHAN Yuen-han also expressed doubt on the feasibility of implementing the HM and HS Schemes in medium-sized and small-sized food premises in view of their current hygiene standard. She considered that the Administration should play a more active role to provide assistance to these food establishments in the implementation of these proposals. The Administration noted the comments.

30. The Chairman asked whether the proposed inspection system and the new Open Categorization Scheme would apply to food premises in private clubhouses. He considered that these food premises should be subject to the same hygiene standard as others. DFEH said that the Administration intended to introduce the proposed changes to 18 000 existing food establishments first and would discuss the regulation of food premises in private clubhouses at a later stage. At the Chairman's request, DFEH agreed to provide an information paper to explain the present policy on regulation of food premises in private clubhouses.

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31. The Chairman asked how the Administration would deal with the problem of changing operators to avoid prosecution where the food establishments already had 15 demerit points. DFEH said that the Administration had considered different ways to address the problem including transferring the demerit points to the new licensee, but this was criticized by the trade to be too harsh. The Administration would continue to discuss the issue with the trade ways to plug the loophole.

32. The Chairman advised that the Administration should also consult the Consumer Council on the proposals in the Consultation Paper and highlight the views of the Consumer Council in the Administration's report on consultation findings.

33. The Chairman suggested that another meeting should be held in April to discuss further with the Administration on the consultation findings. Members

Action

agreed. Mr Tommy CHEUNG and Miss CHAN Yuen-han suggested that the Panel should also invite views from the food trade and members of the public on the Consultation Paper. The Chairman advised that a press release should be issued and a notice be placed on the website of the LegCo to invite public submissions.

(Post-meeting note: A press release was issued and a notice placed on the website of the LegCo on 23 January 2001 to invite public submissions on the Consultation Paper.)

V. Food labelling

(LC Paper No. CB(2) 741/00-01(04))

34. DD(FPH) gave a PowerPoint presentation on the existing food labelling requirements, enforcement of the requirements and Government's proposals to enhance the requirements. He said that the Administration had completed consultation with the trade and the public in late December 2000 on the proposed legislative amendments. The views collected were generally in support of the proposals, and there were suggestions of a longer grace period and greater flexibility in key words used on food labels. The Administration would take these comments into account when considering the implementation details.

(Post-meeting note: The presentation materials were circulated to members vide LC Paper No. CB(2) 757/00-01 (02).)

Discussion

35. Referring to paragraph 8 of the Administration's paper, Mr IP Kwok-him asked whether the proposed requirement of declaring eight categories of allergenic substances on food labels was in line with international practice. DFEH responded that the proposed requirement followed international practice and was based on the recommendation of the Codex Alimentarius Commission of the United Nations.

36. Mr IP Kwok-him asked whether the existing legislation governing food labelling on pre-packaged food also applied to soup ingredients and vegetables sold at supermarkets. DFEH replied that the existing legislation applied to all pre-packaged food. DD(FPH) added that the pre-packaged food mentioned by Mr IP should also have a "use by" date on the labels.

37. Noting that it was not an offence under existing legislation to sell pre-packaged food after the "best before" date marked on the food label, Mr TAM Yiu-chung asked whether the Administration would consider introducing penalties for such practices. He said that many consumers could not differentiate "use by" date from "best before" date. DD(FPH) explained that the "use by" date was usually used for food which was easily perishable. Consumption of such food after expiry of the "use by" date would pose considerable risk to health. The "best before" date was used for other kinds of food to indicate the period for which the quality of the food

Action

remained in the best condition. It did not mean that the food would necessarily perish after this date or would pose a risk to health.

38. On the suggestion of introducing penalties for the sale of pre-packaged food after expiry of the "best before" date, DD(FPH) said that this would involve amending the Public Health and Municipal Services Ordinance (Cap. 132) and the relevant regulations. He said that the legal advice obtained by the Administration was that Cap.132 was concerned with the protection of public health. It would be an offence under the Food and Drugs (Composition and Labelling) Regulations if non-compliance with the labelling requirements posed a health hazard to consumers, and the retailer concerned would be liable to a maximum fine of \$50 000 and imprisonment for six months upon conviction. DD(FPH) added that he was not aware of any other countries which had introduced penalties for the sale of food after expiry of the "best before" date. He said that the Administration would keep this matter in view.

39. The Chairman said that at some retail outlets, pre-packaged food was sold at a discount after expiry of the "best before" date. He asked if there were restrictions on the sale of food where the "best before" date had expired for some time. DD(FPH) advised that there was currently no statutory requirement in this respect. However, FEHD could conduct random checks to ensure compliance with the labelling requirements, and samples of pre-packaged food with an expired "best before" date were collected for laboratory test. If the results of the tests indicated that a food item had perished, the seller concerned would be prosecuted under section 54 of Cap. 132. He said that consumers should read food labels carefully, with special attention to the durability period of food and the list of ingredients.

40. In response to Miss CHAN Yuen-han, DFEH said that the current proposal on the date marking format for the "best before" or the "use by" date of food produce was in line with international practice.

41. Miss CHAN Yuen-han asked whether the Administration would introduce measures to enable consumers to know the ingredients of food items like fish balls and Chinese New Year food which were not pre-packaged. DFEH clarified that the present proposal was for pre-packaged food. If the labelling requirements were to be extended to other types of food, consideration should be given to operational practicality. She said that to safeguard public health, FEHD staff conducted surprise inspections on retail shops and collected samples of food items, including those not pre-packaged, for laboratory tests to protect public health.

42. Miss CHAN Yuen-han asked about the extent of sampling checks conducted by FEHD and the effectiveness of this food surveillance system. DFEH replied that each year, 50 000 to 60 000 food labels were inspected. She said that this figure was large compared with overseas countries. DFEH said that while Government was responsible for providing information and enforcing the law, consumers also had the

Action

responsibility to seek information and acquire a better understanding on the food they consumed. DD(FPH) added that given the large amount and great variety of food on sale, it was difficult for FEHD to conduct checks on all food on sale. He pointed out that consumers should ask for more information from retailers in case of doubt. They should also report problems with any food items to FEHD so that FEHD could take action.

43. Mr Michael MAK said that biscuits with individual wrappings had very limited space for labelling. He asked whether the proposal of listing out the eight categories of allergenic substances also applied to such food produce. DD(FPH) replied that according to the current proposal, any of the eight substances, if contained in a food item, should be declared on the list of ingredients of the food label irrespective of the packaging format of the food item. He added that when implementing the requirement, the Administration would allow a grace period for the food trade.

44. Mr Michael MAK suggested including the "manufacture date" in addition to the "best before" date on food labels especially for alcoholic drinks. DD(FPH) replied that similar suggestion had been received during the consultation exercise, and its feasibility would depend on the acceptance of the trade and the community having regard to international practice.

45. Mr Michael MAK also asked about the reasons for exempting drinks with alcoholic strength by volume of more than 10% from the marking and labelling requirements. DD(FPH) explained that drinks with alcoholic strength by volume of less than 10% would deteriorate over time but not for drinks with alcoholic strength by volume of more than 10%. It was therefore necessary to mark a "best before" date on the label of drinks with alcoholic strength by volume of less than 10%. He further said that labelling of the ingredients of alcoholic drinks should not be required because the input ingredients could change significantly during the manufacture process and the composition of the final product might also change over time. Moreover, there was not a commonly accepted method for testing the ingredients of alcoholic drinks.

46. Mr Michael MAK suggested that the input ingredients of alcoholic drinks should be declared on the labels as some ingredients such as barley might cause allergies. He said that FEHD could conduct sampling tests to verify the declared ingredients. He considered that even though other countries might not have adopted such labelling practice for alcoholic drinks, Hong Kong could take the lead in this respect.

47. DD(FPH) explained that should Hong Kong decide to impose such labelling requirement, all of the imported alcoholic drinks would have to comply with the requirement. He reiterated the technical problems in connection with the labelling and testing of the ingredients of alcoholic drinks as the input ingredients could differ

Action

significantly from output ones. He said that this matter had been under international discussion and an internationally acceptable standard would be required for enforcement. FEHD would keep a close watch on any changes in international practices before proposing new measures in this regard. DEFH added that the court would only accept evidence supported by laboratory tests results and there would be difficulties given that the input ingredients would change during the manufacturing process. Deputy Secretary for the Environment and Food (DS(EF)) also pointed out that if Hong Kong introduced its own labelling requirements which were not adopted by other countries, importers would have to bear the extra costs for meeting the additional labelling requirements. Since most food in Hong Kong was imported from other countries, the extra costs would have implications on the retail prices.

48. Referring to paragraph 10 of the paper, Mr Tommy CHEUNG said that consumers might not understand the meaning of the identification number of additives under the International Numbering System for Food Additives adopted by Codex. He asked whether food premises and supermarkets would be required to provide booklets on identification numbers for reference by consumers. DFEH replied that a person who was allergic to certain substances should check with his/her doctor the identification number of food additives causing allergy to him/her. The Administration would also discuss with the food trade to see if food premises and supermarkets could make available booklets on the International Numbering System for Food Additives for consumers' reference.

49. Mr Tommy CHEUNG asked whether all importing countries were required to comply with the proposed labelling requirements and whether a grace period would be allowed. DFEH said that as a member of the World Trade Organization (WTO), Hong Kong had notified WTO and its member states the proposed legislative timetable and details of the proposed requirements. She said that no objections had been received during the notification period. The Administration intended to introduce the relevant legislative amendments to LegCo in mid 2001 and a grace period of 18 months would be allowed.

50. Mr Tommy CHEUNG sought clarification as to whether Hong Kong could require the exporting country to label its food produce, even if that country did not have such labelling requirement, in order to comply with the labelling requirements of Hong Kong or that of the international community. He said that this could save importers much cost and efforts that would otherwise be needed for compliance with the proposed statutory labelling requirements. DFEH replied that it would depend on whether the labelling requirement was reasonable and consistent with international practice. It must also be related to food safety and the exporting countries had to be informed in advance of the implementation of the proposed labelling requirements. She was of the view that importers could exert pressure on their suppliers.

51. Referring to the recent food crises such as cholera found in soft shell turtles and in cockles imported from Thailand, Mr WONG Yung-kun asked what measures

Action

the Administration would take to regulate the import of meat and seafood. He suggested that the Administration could require importers to declare the country of origin of seafood and meat to facilitate consumers to make informed choices. He also considered that Government should disseminate information on the types of marine fish which had been found to have ciguatoxin and those seafood which were found unsafe for consumption.

52. DFEH responded that the present proposals on labelling requirements were mainly concerned with substances that would cause allergy to some individuals. However, the concerns raised by Mr WONG were more related to the presence of toxic substance and food borne disease in seafood. She said that it was difficult to trace the origin of marine fish with toxic load. Nevertheless, she noted that Agriculture, Fisheries and Conservation Department had established contact with the exporting countries/places to better understand the conditions of their fishing ground such as the water quality. DD(FPH) added out that as far as prevention of allergic substances was concerned, declaration of the country of origin would not help.

53. DS(EF) supplemented that labelling of fresh food was a very complicated issue and very few countries had such requirements. He explained that the Administration considered it more important to indicate on pre-packaged food labels the presence of any of the eight substances that would cause allergy.

54. The Chairman asked whether the sale in supermarkets of dumplings packed in styrofoam containers without labels on the ingredients was in breach of the food labelling requirements. DD(FPH) explained that pre-packaged food referred to food packaged in such a way that the contents therein could not be altered without opening or changing the packaging. DFEH added that the food labelling requirements only applied to food which was already packaged and sealed from the place of manufacture to the retail outlet. Food only covered with plastic food wrap should not be regarded as pre-packaged food and the labelling requirement would not apply.

55. The meeting ended at 10:30 am.