

Our Ref : ADM/E6-01/292

18 April 2001

Hon. Mr. Fred LI
Chairman
Legco Panel on Food Safety and Environmental Hygiene
Hong Kong Special Administrative Region of the
People's Republic of China
Legislative Council
8 Jackson Road
Central
Hong Kong

Dear Hon. Mr. Fred LI,

Legco Panel on Food Safety and Environmental Hygiene
Consultation Paper on The Inspection and Categorization of Food Establishments

Thank you for your fax dated 3rd April 2001 regarding the caption. As a food establishment operator, we are in supportive of the proposition to enhance food safety in the interest of the public.

However, having perused the content of the Consultation Paper, there are some area which we do not quite agree with and wish the Government would review them. In Clause 4.25 which proposed the formulation of a HACCP - based food safety plan on large food manufacturing plants. We foresee that there would be some constraints which make it difficult or even impossible to materialize the same by the existing food manufacturing plants.

HACCP is an international food safety standard that requires the adequate provision of production facilities such as new machinery, production space and other logistic supports. It would have a great impact on the existing food manufacturing plants which were not built according to these pre-requisites. However, these plants are licensed according to the current health regulation and we believe there are already sufficient regulatory mechanism to govern them. Therefore, it will be more reasonable to impose this new regulation, starting from a publicly announced date, only on new establishments.

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Moreover, the paper also mentioned large manufacturing plants producing food for mass consumption, or any plants producing high risk food (irrespective of their size), may formulate a HACCP-based food safety plan for FEHD's approval as the basis for future regulation. We wish that the Government would recognize the certification of such HACCP by some "authorized / licenced" quality assurance consulting companies and grant its approval rightaway. We believe this would speed up the licensing process and will be a good news to the food industry.

We hope the Hon Mr. Fred LI would consider our suggestions and convey the same to the Government.

Meanwhile, we regret that we will not assign representative to attend the coming meeting on 26th April 2001. Should you have any query regarding the above, please do not hesitate to contact the undersigned at 2523 4107.

Thank you for your kind attention.

Yours sincerely
For MAXIM'S CATERERS LIMITED

MOK Ming Tak
General Manager
Human Resources, Office Administration

MTM/ET/CC

c.c. Food & Environmental Hygiene Department - Mr. Ng King Sun
Jardine Matheson Limited - Mr. Martin Barrow - Director
Hong Kong Catering Industry Association - Hon Mr. Tommy Cheung Yu Yan