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Clerk to the Subcommittee (Streamlining of Food Business Licensing)
Food Safety and Environmental Hygiene Panel
Legislative Council Secretariat
3/F, Citibank Tower
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Submission by PARKnSHOP to the Panel on Food Safety and Environmental Hygiene Subcommittee to study the streamlining of food business licensing

On behalf of PARKnSHOP, I would like to thank you for inviting our company to make this submission.

Over the past few years, progress has been made in the area of issuing food business licenses, but further streamlining is required to facilitate more efficient use of business and government resource. Greater operational flexibility is needed within the licensing system that will promote rather than prevent hygiene improvements.

Specifically, I would be very grateful if the Subcommittee would consider the following points:

1. Supermarket License

The present licensing system was designed for small individual wet market stalls and small stand-alone food businesses and does not fit appropriately with the modern Supermarket or SuperStore. For example, each individual store may have to apply for up to 19 individual licenses; a situation that should be improved.

The setting up of a new 'General Supermarket' license in place of the 19 individual licenses would be a significant step forward provided it was set up appropriately.

The new 'General Supermarket' license could for example carry endorsements for all the types of food currently requiring existing licensing and the demerit system would need to apply to endorsements rather than the new license as a whole. Only one license application would be required for each Supermarket or SuperStore and the fee should be related to the number of endorsements and should result in no change in licensing income for the government.



2. Sui Mei/Lo Mei Licensing

Notwithstanding (1), the current Sui Mei Lo Mei License should be combined with the existing food factory license. Sui Mei Lo Mei is required under the license system to be cooked in the food factory licensed area, but cannot be sold there (unlike all other food cooked there) and can only be sold in a separate Sui Mei Lo Mei Licensed area. This separate licensed area must not sell any other ready to eat food such as cooked rice in the form of a Sui Mei lunch box for example, even though this is how most consumers eat Sui Mei.

3. Issue times for Licenses

It is our first hand experience that provisional licenses are usually issued within two to three months and full licenses within about five months.

Although the situation has improved, it could be further developed by having a licensing department sitting in one office within the FEHD, that has seconded relevant expert staff from other government departments that have to approve license applications (eg. Building Services Department, Fire Services Department, Electrical and Mechanical Services Department and Environmental Protection Department). This should create a sense of license application 'ownership' on the part of the FEHD and facilitate approval co-ordination and avoid 'passing the buck' from one government department to another.

4. Changes to License Layout

It is our first hand experience that government approval of minor changes to layout plans can take two to three months and major changes up to five months. This severely hinders layout changes to facilitate hygiene improvement plans. A simple and rapid system should be adopted, with if need be, provisional approval initially (within 7 days).

5. New Licensed Premises

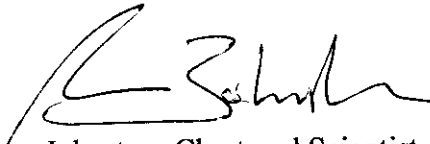
Currently, a new store has to wait until the building is completed and all the fitments and fixtures work have been completed before applying for a license, which makes opening new stores problematic.

Applications should be accepted before the building work is completed with only a site inspection required to verify drawings and documents following completion and a license immediately issued.

6. Annual License Fee Payment

Currently, the method for license fee notification and payment differs according to region. For example, license fee notifications for our stores in Hong Kong Island are sent centrally to our head office in Shatin where they are efficiently processed and paid by one convenient method. However for our stores in the New Territories, they are sent to each individual store and can only be paid at a pre-designated location given by the FEHD. This is most inefficient and unsatisfactory. The old Regional and Urban Councils have long since gone and an efficient and consistent method should be adopted. It costs the government the same in postage wherever the location in Hong Kong and the revenue is the same wherever paid.

I trust the Subcommittee considers these proposals in Hong Kong's interest and will urge the government to take action.



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