

**For discussion  
on 9 November 2004**

**LegCo Panel on Food Safety and Environmental Hygiene**

**Proposed Accreditation Scheme for Seawater Suppliers**

**PURPOSE**

This paper briefs Members on the proposal of establishing a voluntary accreditation scheme for seawater suppliers in a bid to enhance the quality of fish tank water.

**BACKGROUND**

2. Natural seawater has long been used by the seafood trade for keeping live seafood. The availability of a reliable source of seawater is therefore important to ensure the quality of fish tank water. At present, there is no specific regulation controlling the delivery and supply of seawater, nor is there any legal provision prohibiting the abstraction of seawater from inshore waters where the quality of seawater is doubtful. Hence, the supply quality of seawater cannot be guaranteed.

**PROPOSED ACCREDITATION SCHEME**

3. At the meeting of the LegCo Panel on Food Safety and Environmental Hygiene held on 27 April 2004, we briefed Members our proposal to introduce legislation to prohibit the abstraction of seawater from specified areas for keeping live seafood (see paragraph 20 for further details). To further ensure the quality of seawater, we propose to establish an accreditation scheme for seawater suppliers to motivate them to exercise self-regulation. Seawater suppliers will be encouraged to join the scheme on a voluntary basis. Accreditation is attained through a process of evaluation and periodic review in accordance with preset criteria, policies and procedures. The ultimate target of the scheme is to ensure the availability of reliable seawater supply. It also assists seafood

restaurants/retail stalls to have better control of the quality of fish tank water for compliance with the prescribed legal standards.

### ***Types of Seawater Suppliers***

4. Seawater suppliers can be classified broadly into four types according to their modus operandi -

#### *(a) Suppliers operating a seawater treatment plant*

5. Seawater suppliers of this category abstract and transport seawater to seawater treatment facilities for filtering and disinfection before use. An example of this type is the Fish Marketing Organisation (FMO) which supplies treated seawater to seafood wholesalers/traders on a cost-recovery basis. At present, FMO has two 150-tonne and one 120-tonne seawater treatment plants at the Aberdeen Wholesale Fish Market and Kwun Tong Wholesale Fish Market respectively. FMO is building another 120-tonne seawater treatment plant in Cheung Sha Wan Wholesale Fish Market, which is expected to operate by the end of 2004.

#### *(b) Seafood wholesalers*

6. There are about 40 seafood wholesalers in FMO-operated wholesale markets and some other wholesalers operating outside FMO-markets. Most of them have their own boats and obtain water from the sea.

#### *(c) Suppliers operating water delivery vehicles / boats*

7. Another type of seawater suppliers operates water delivery vehicles to transport seawater to seafood restaurants directly. It is estimated that there are less than ten such suppliers. They abstract seawater either at sea by boat or along coastal area. The scale of their business is relatively small as the volume of seawater abstracted is limited by the vehicle size, which is usually 2-6 tonnes, capable of serving only a few operators during each delivery.

*(d) Seafood traders*

8. There are more than 500 traders who sell seafood bought from seafood wholesalers to seafood restaurants/retail stalls. When delivering seafood, many of these traders also provide seawater to the restaurants/retail stalls. It is believed that most of these traders obtain seawater from coastal area as they do not have boats while a few of them obtain seawater from water suppliers like FMO.

***Accreditation Criteria***

9. We propose that the accreditation scheme should cover all four types of seawater suppliers. To attain an accreditation status, the seawater suppliers should meet the following criteria -

*(a) Source of seawater*

10. For seawater suppliers who obtain water from the sea or coastal area, they need to seek the accrediting body's endorsement on their proposed list of seawater abstraction points. They are not allowed to abstract seawater from doubtful sources like those prohibited areas under the proposed new legislation. Suppliers should keep records showing the locations from where their seawater is obtained.

11. For seafood traders who obtain water from seawater suppliers, they should keep records showing that their water is acquired from accredited seawater suppliers.

*(b) Filtration and disinfection systems*

12. For the first two types of seawater suppliers, they should install proper filtration and disinfection equipment to treat the abstracted seawater before supplying to seafood wholesalers/restaurants/traders/retail shops. Filtration and disinfection facilities should either be installed at the boat or the seawater treatment plant. They should follow the guidelines of the accrediting body in this respect to install and maintain their filtration and disinfection systems. Such guidelines will be developed with reference to the Guidelines on Filtration and Disinfection Facilities for Fish Tank Water published by FEHD as

appropriate.

13. For the last two types of seawater suppliers, our inclination is to exempt them from installing filtration and disinfection system in their vehicles for the following reasons -

- (i) The duration between acquisition of seawater from seawater suppliers and delivery of seafood to restaurants is expected to be short, probably within two hours. The installation of filtration and disinfection facilities may not help much in disinfecting the seawater; and
- (ii) For the seafood trader type of seawater suppliers, we believe that most of them will purchase water from accredited seawater suppliers after the introduction of the proposed new legislation as they will be prohibited to abstract seawater from specified areas along the coast. Besides, their main business is trading of seafood not seawater. Compulsory installation of filtration and disinfection equipment will substantially increase their operating cost and discourage them from joining the voluntary accreditation scheme.

*(c) Equipment cleansing and maintenance schedules*

14. Seawater suppliers should put in place a cleansing and maintenance schedule for all equipment used for abstraction, storage, delivery, and filtration and disinfection of seawater. They must follow the guidelines of the accrediting body, which will be developed with reference to the Guidelines on Filtration and Disinfection Facilities for Fish Tank Water published by FEHD for proper cleansing and maintenance of equipment.

*(d) Seawater sampling*

15. The accrediting body will conduct seawater sampling of seawater suppliers during the year. Water samples should not have *E. coli* counts exceeding the level of 180 cfu per 100 ml of water. The seawater suppliers should also send water samples to accredited private laboratories for testing of *E. coli* regularly.

*(e) Documentation*

16. Seawater suppliers should keep documents properly including the record indicating the seawater abstraction point, the maintenance record of filtration and disinfection systems, equipment cleansing and maintenance record, laboratory results of water samples tested by the private laboratories, etc. The accrediting body will check these records during their surprise audit.

***Audit***

17. All accredited suppliers are subject to surprise visits by the accrediting body each year. Water samples will be taken from the accredited suppliers during surprise visits for laboratory tests. Accredited suppliers should make all documents available for inspection at the time of audit.

***Deviation from Acceptable Performance***

18. A de-merit point system will be devised. Any irregularities detected during visits by the accrediting body and any unsatisfactory water sample results will be recorded. Accredited suppliers will lose the status of accreditation when they have accumulated a specified number of de-merit points.

***Encouraging Participation***

19. Seafood restaurants/retail shops are encouraged to source seawater from accredited suppliers. Those seafood wholesalers/restaurants/retail shops which source seawater from accredited suppliers are allowed to post the certificate of the accredited seawater supplier or a “logo” on their premises. This will provide incentive for the wholesalers/restaurants/retail shops to source seawater from accredited suppliers and in turn for seawater suppliers to get accreditation. List of accredited suppliers will be posted on the website of FEHD. FEHD will check the documentation of these wholesalers/restaurants/retail shops during their regular inspections to ensure that the seawater is acquired from accredited seawater suppliers.

## **PROHIBITION OF ABSTRACTION OF SEAWATER FROM SPECIFIED AREAS ADJACENT TO THE COAST**

20. To enhance the quality of fish tank water, the Administration has proposed to prohibit the abstraction of seawater from specified areas adjacent to the coast for keeping live seafood. In this regard, we have drawn reference to water quality statistics provided by the Environmental Protection Department (EPD) over the past few years. The statistics consistently showed a high level of *E.coli* in waters in (a) the Victoria Harbour; (b) typhoon shelters; and (c) the western side of the New Territories. We therefore intend to prohibit the abstraction of seawater from these three areas adjacent to the coast for keeping live seafood. Non-compliance will be an offence. The proposal requires amendment to the Food Business Regulation (Cap. 132 sub. leg.).

### **WAY FORWARD**

21. We will develop further details of the accreditation scheme and identify a suitable accrediting body. Consultation with the trade will be conducted before implementing the scheme. Subject to Members' comments on the proposed scope of prohibition of seawater abstraction, we will proceed to work on amendments to the Food Business Regulation. Our target is to implement the accreditation scheme and to enact the Amendment Regulation next year.

### **ADVICE SOUGHT**

22. Members are invited to comment on the proposals as outlined in paragraphs 3 – 20 above.

**Health, Welfare and Food Bureau  
Food and Environmental Hygiene Department  
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