

September 25, 2006

**U.S. Meat Export Federation****Submission to Sub-committee on  
Food Business (Amendment) Regulation 2006  
Meeting on September 26, 2006**

Greetings. On behalf of US beef and pork producers and exporters, the US Meat Export Federation appreciates this opportunity to comment on the Food Business (Amendment) Regulation 2006.

We also appreciate the efforts by HK authorities to strengthen food safety measures on behalf of HK citizens, and to provide more transparency to food buyers about the origins and production methods of various foodstuffs sold here.

Our comments today relate to a specific requirement of the new labeling regulations for chilled beef, mutton and pork. The new labeling requirement specifies that pre-packaged chilled meats indicate the slaughtering plant name and slaughter date of pre-packaged chilled meats, as well as the other information such as the "use by" date, weight, etc.

The reason for the new requirement, as stated in Hong Kong's notification to the World Trade Organization for the new regulation, is that chilled meats in HK have been labeled and sold as fresh meats, and that chilled and fresh meats have different shelf lives and require different storage conditions. The WTO notification also states that there is a contamination risk if fresh and chilled meats are mishandled and mixed during the retail stage.

We would like to express our specific concern about the requirement that pre-packaged chilled meat display the slaughter date and slaughter plant name. We believe that retail labeling of the slaughter date and slaughter plant name does not provide additional food safety re-assurances to HK consumers. We also question whether this measure, in and of itself, will prevent the mislabeling of chilled meat as fresh.

Slaughter dates and plant names are not indications of product safety, quality and freshness. We believe the labeling of this information may cause consumers to be misled about the freshness of chilled meat products. US beef and pork is vacuum-packed at the source of origin in the US, and its freshness, safety and product quality integrity can be preserved for weeks and months if handled properly during shipment. HK consumers however, could assume otherwise by viewing slaughter dates that appear dated when compared with fresh or chilled products from China or other nearby locations. This could create an undue bias against safe and fresh products from the US and other countries supplying meat from relatively distant geographical locations.

Moreover, information about the slaughter plant name does not provide useful food safety or product quality information to consumers. We are unaware of any other country or territory requiring the statement of slaughter dates and plant names on consumer meat packaging. Finally, we note that the labeling requirements impose additional costs to US exporters and those throughout the chilled meat marketing chain without adding appreciable consumer value or enhancing true food safety.

I respectfully thank you again for the opportunity to address this Subcommittee.

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