

**Legislative Council**  
**Panel on Food Safety and Environmental Hygiene and**  
**Panel on Environmental Affairs**

**Reorganization Plan for the Food Safety Regulatory Framework**

**Written Submission from Professor Thomas Y.K. Chan, MD, PhD, FRCP**

I am providing this submission in my capacity as a Professor in the Department of Medicine and Therapeutics and the Director of the Centre for Food and Drug Safety, Faculty of Medicine, The Chinese University of Hong Kong.

I have a special interest in toxicological problems related to food consumption and the importance of diet in the prevention and treatment of chronic diseases, including high blood pressure.

(28 December 2005)

**Background – objectives and requirements of a food safety programme**

1. Safe food for all is the main objective of a food safety programme and the shared responsibility of the governments, the food industry/trade and consumers.
2. The governments' main responsibility is food legislation and enforcement. The governments also provide advice for the food industry/trade and consumer education and undertake information gathering and research.
3. Maintaining the quality and safety of food throughout the food chain (from agricultural production, processing, manufacturing, retailing to consumption) requires operating procedures to ensure the wholesomeness of food and monitoring procedures to ensure operations are carried out as intended.
4. Food safety agencies should have the resources and the staff with the necessary expertise to carry out their mandate. There should not be overlapping or conflicting responsibilities among food safety agencies.

**Merits in the Reorganization Plan for Food Safety Regulatory Framework**

5. There will now be one dedicated department, the Department of Food Safety, Inspection and Quarantine (DFSIQ), with primary responsibility for food safety across the entire food chain.

6. The infrastructure of the DFSIQ and the responsibilities of its five branches and Centre for Food Safety are very well defined. Overlapping responsibilities of various departments and units are avoided. Additional directorate and non-directorate posts will be created to provide the support required.

7. This reorganization should allow the Administration to pool the manpower and resources and coordinate the efforts in promoting food safety. Both the effectiveness and efficiency of measures to promote food safety can thus be improved.

8. The DFSIQ will be responsible for food safety. It must not have a conflicting mission, such as promoting agriculture and fisheries. The Department of Agriculture and Environmental Hygiene (DAEH) will take up the latter responsibility. Such an arrangement will help ensure that the Administration can adequately serve the interest of the consumers (food safety) as well as the food industry (promoting agriculture and fisheries).

### **Other comments**

9. The Mainland is our major supplier of poultry, livestock, aquaculture produce and other foods. It is most important that the Administration has established excellent communication and cooperation with the Mainland regarding food safety and source management.

10. Vegetable-borne pesticide poisoning is now rarely seen in Hong Kong because of the success of source management, registration, tracking and recall system and food monitoring. Similar arrangement can be applicable to other foods.

11. In view of the number of foods available in the market, the need to strengthen source management, the known and emerging threats from foods and the amount of work involved, sufficient manpower and resources should be made available.

12. In order to make the food regulatory measures and decisions more transparent and scientific, there should be greater participation by the industry/trade, consumers, academics and experts in various scientific committees.

13. Enhanced communication between the Administration, the food industry/trade and consumers can be through various channels.
14. Recent food scares concerning malachite green clearly illustrated the public's food safety concerns and the importance of risk communication. Sufficient resources should be allocated to risk assessment and risk communication.
15. Experience in other countries has shown the role played by consumers (non-government organizations) and academics (research & development and expert advice) in promoting food safety. The consumers, academics and other stakeholders in Hong Kong can play a more active role.
16. The hard work of the staff of FEHD, AFCD and other colleagues in promoting food safety in Hong Kong is much appreciated.