



HONG KONG RETAIL MANAGEMENT ASSOCIATION

Unit B, 22/F United Centre, 95 Queensway, Hong Kong.
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3 May 2006

Mr Fred Li
Chairman of Panel on Food Safety and Environmental Hygiene
Legislative Council Building
8 Jackson Road
Central
Hong Kong

Dear Mr Li,

Re: Retail Sale of Fresh and Chilled Meat

On 18 April 2006, members of the HKRMA met the FEHD and Mr Vincent Fang to discuss proposals regarding the licensing of fresh and chilled meat.

Attached for your reference are two letters from members of the HKRMA to the FEHD setting out their position regarding the existing licensing requirements in relation to fresh provision shops (“FPS”).

The HKRMA believes that the existing licensing requirements, which were further amended only in June of last year, ensure a physical separation of fresh and chilled meat in retail outlets and that there already is minimal risk of fresh and chilled meat cross contamination.

Please note however that our members have proposed further additional measures to ensure the effective separation of fresh and chilled meat in stores. These changes could be implemented without the need to amend existing legislation.

The HKRMA strongly opposes any efforts to amend the licensing regulations to add a further licence (by splitting the FPS licence into separate fresh and chilled licences) and to force retailers to choose between selling fresh and chilled meat.

Any steps to amend the legislation would:

- (a) be unnecessary on public health grounds;
- (b) limit consumer choice as consumers could no longer “one stop shop” by buying fresh and chilled meat in the same retail outlet;
- (c) hinder the ongoing efforts to simplify the existing licensing regulations; and

- (d) represent an unjustifiable restraint of trade on retail operators, which is contrary to the prevailing free market practices for which Hong Kong is so well renowned.

This issue is very important to our members and we wish to have the opportunity to attend a meeting of the Food Panel at the earliest opportunity in order to submit to you the views of the HKRMA on this issue.

We thank you in advance for your help in this regard.

Yours sincerely,

Anita Bagaman

Anita Bagaman (Miss)
Executive Director

c.c. Mr Vincent Fang, JP, Legislative Councillor, Wholesale and Retail.



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Mr. Gregory Leung
 Director
 Food & Environmental Hygiene Department
 45/F, Queensway Government Offices,
 66 Queensway,
 Hong Kong.

21 April 2006

Fresh & Chilled Meat Retail Licencing

Dear Mr. Leung,

Following our recent meeting on the above subject, I would like to put forward the following proposal for your consideration:

Although we do not believe there is a significant risk of fresh and chilled meat cross contamination in our stores with the existing licencing arrangements; the following additional measures to increase the separation of fresh & chilled meats could be considered as workable:

1. Fresh Meat provision shop licences in Supermarkets should continue to be permitted to sell both fresh and chilled meats provided they comply with all aspects of existing regulation to ensure separation.
2. The Retail display counter within the licenced premises layout plan could include designated sections of the counter for fresh meat only and chilled meat only.
3. The two designated areas could be separated by a poultry only area in between.
4. Each area could be separated by a perspex divider to an agreed height.
5. It would be an offence to sell any type of meat in any given area other than that specified in the licenced layout plan.
6. With regard to chilled pork from China, traceability records will be maintained detailing slaughter plant of origin

We do not agree with the need for two separate licenced areas for fresh and chilled meat which will further complicate the issue of supermarket licencing which we are all trying to simplify. It would also confuse and frustrate our customers. We do not believe food safety is an issue here, although we do believe the above measures will ensure the consumers interest is protected.

Yours Sincerely

Peter Johnston
 General Manager -
 Quality, Food Safety & Regulatory Affairs

Supermarkets of
 Hutchison Whampoa Limited



caring company
 member of the Hong Kong Council of Social Service
 香港社會服務界協會



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24 April 2006

Mr. Gregory Leung
Director
Food & Environmental Hygiene Department
45/F, Queensway Government Offices
66 Queensway
Hong Kong

Dear Mr. Leung,

Re: Retail Sale of Fresh and Chilled Meat

We refer to the meeting on 18 April 2006 regarding the licensing of fresh and chilled meat.

We believe that the existing licensing requirements, which were further amended only in June of last year, ensure a physical separation of fresh and chilled meat in retail outlets and that there already is minimal risk of fresh and chilled meat cross contamination.

Nevertheless, to further ensure the separation of chilled and fresh meat, we believe that the following additional measures would be workable:

- The retail counter within the fresh provision shop ("FPS") layout plan could include designated sections of the counter for fresh and chilled meat only;
- Each area could be separated by a perspex divider to an agreed height;
- It could be made an offence to sell any type of meat in any given area other than that specified in the layout plan; and
- For chilled pork imported from China, traceability records could be maintained noting the slaughter plant of origin.

These changes could be implemented without the need to amend existing legislation. We believe that the above measures would ensure protection of the interests of the consumers.

We would oppose any efforts to amend the licensing regulations to add a further licence (by splitting the FPS licence into separate fresh and chilled licences) or to force retailers to choose between selling fresh and chilled meat. Any such steps would be unnecessary, contrary to efforts to simplify the existing licensing regulations, and would be of no benefit to consumers.

Yours sincerely,



David Bound

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