

立法會 CB(2) 807/05-06(03)號文件
LC Paper No. CB(2) 807/05-06(03)

Legco Panel on Safety and Environmental Hygiene on January 6, 2006

Re: Submission by Hong Kong Suppliers Association on Reorganization Plan for the Food Safety Regulatory Framework and Integration of Nature Conservation with Environment Protection Functions

We support the Administration's initiative in improving food safety and veterinary public health control. However, we have reservation in supporting the reorganization approach. The Reorganization will add a recurring expenditure of \$150 million per year, not including non-recurring cost. The reorganization plan did not adequately identify the problems with the existing structure; explain adequately how the Reorganization would resolve the problems; and specific action plans following the Reorganization. Is adding manpower, upgrading Government officials and restructuring as proposed the only solution? Are there other lower cost options? The Administration must ensure that the taxpayers' money is well spent and the said objective in the proposal will be achieved and results verifiable.

We are not in a position to express our support to the Reorganization since the information we have on hand is limited. In principal,

1. We support the Administration (Paragraph 4 in the Proposal) to exercise control at source. The source is the food producers in Hong Kong, in the Mainland and in other countries. The Administration should stop unsafe food at the manufacturing level for packaged food and at the farming level for livestock, poultry, aquaculture and fresh produces. The control must be at the source level.

Importers, wholesalers and retailers have limited control on the production of food. They are not the source. The Administration should provide help and education to these suppliers to ensure that food products they purchased and sold are safe. They should be responsible for the part of the supply chain that they have control over, such as storage, freshness, hygiene, etc. It would be unfair to prosecute them on food safety when they have little or no control, e.g. if fishes purchased from a farm approved by Administration found to be unsafe, the responsibility should rest on the farm and the Administration controlling it, not the importer, wholesaler or retailer.

2. We support improving communication with the Mainland (Paragraph 5), since Mainland is our major supplier of food.
3. The purpose of setting up a Centre for Food Safety (CFS) is to enhance existing function of the local food safety regulatory authorities (Paragraph 6). CFS should also ensure that existing and future food regulations are compliable by the trade, workable, effective and will truly achieve the objectives of the regulations.

4. The purpose of the five branches under DFSIQ (Paragraph 7) is to facilitate the improvement of food safety efficiently. We support this purpose. The five branches or similar restructuring, however, should not create unwarranted bureaucracy, paperwork and cost to the trade. For example, multi-departmental or complicated approval to sell a product and cost bearing registration and licensing should be avoided.
5. A Food Standards Committee (Paragraph 13) or the like consisting of experts and academics may enhance the formulation and review of food standards. We further proposed that representatives from the related trades should be included in this Food Standard Committee as regular members to further strengthen the consultative framework.
6. We support the merger of AFCD's Country/Marine Parks and Conservation Branches with EPD since the works are closely related (Paragraph 14).

In summary, the objective is good. The administration must ensure the objective is achievable, results measurable and verifiable. The Administration should balance the resources between setting up food safety regulation framework, educating the public in food safety and helping the trade to comply. The Administration should not impose non-compliable regulations and regulations that will create great hardship to the trade. The Administration should always consider the trade difficulties (especially to the SME as they almost always become the victim of costly regulations), consumer impact and effectiveness in regulations and control.

Thank you and end of Submission