



中華人民共和國香港特別行政區政府總部食物及衛生局  
Food and Health Bureau, Government Secretariat  
The Government of the Hong Kong Special Administrative Region  
The People's Republic of China

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Ms Elyssa Wong  
Clerk to Panel  
Legislative Council Panel on Health Services  
Legislative Council Complex  
1 Legislative Council Road  
Central, Hong Kong  
(Fax: 2185 7845)

Dear Ms Wong,

**Legislative Council Panel on Health Services**  
**Regulation of Pesticide Residues in Chinese Herbal Medicines**

I refer to the discussions on the captioned subject at the Panel meeting held on 16 December 2013. Our reply to the questions raised by Members at the meeting is as follows.

- (1) **Types of Chinese herbal medicines of which samples were collected from the market for testing**

Samples of Chinese herbal medicines collected by the Department of Health (DH) from the market can be categorised into three types, namely those of herbal origin, animal origin and mineral origin. From December 2012 to November 2013, the DH obtained a total of 377 Chinese herbal medicine samples from the market for testing of pesticide residues.

Among the 377 samples mentioned above, only 10 samples of herbal origin were found containing pesticide residues in the first-stage test (i.e. testing the Chinese herbal medicines before decoction). All of these 10 samples, however, passed the second-stage test (i.e. testing the amount of pesticide residues in the decoctions of the Chinese herbal medicines). In other words, the pesticide residues contained in these 10 samples **did not exceed** the "Acceptable Daily Intake" (ADI) for pesticide as established by the Joint Food and Agriculture Organization/World Health Organization Meeting on Pesticide Residues. According to Chinese medicines literatures, such as the Pharmacopoeia of the People's Republic of China (《中華人民共和國藥典》) and Zhonghua Bencao (《中華本草》), the Chinese herbal medicines of the above 10 samples are recommended for consumption only after decoction.

## **(2) Number of samples of Chinese herbal medicines tested**

The DH adopts a two-pronged approach in testing Chinese herbal medicines. Through its routine market surveillance system, the DH collects around 30 samples of Chinese herbal medicines each month for testing based on risk assessment. In addition, based on the information gathered from various channels, including the adverse events reporting system, complaints lodged by members of the public and referrals from other government departments, special follow-up tests will be conducted on Chinese herbal medicines suspected of dubious quality. About 220 special follow-up tests are conducted each year. We will closely monitor the effectiveness of the testing work and review in due course the need of increasing the number of samples collected.

## **(3) Using the ADI instead of the "Maximum Residue Limits" (MRL) of pesticide residues as reference for food safety**

The ADI of a pesticide, which is established by the Joint Food Agricultural Organization/World Health Organization Meeting on Pesticide Residues, refers to the estimate of the amount of a pesticide in food or drinking-water, expressed on a body-weight basis, that can be ingested daily over a lifetime without appreciable health risk to the consumer. The ADI reflects the safety limits of pesticide intake by human and is an international reference standard commonly used for **health risk assessment**. On the other hand, the MRL of a pesticide, which is established by the Codex Alimentarius Commission, refers to the maximum concentration of a pesticide residue to be legally permitted



in a food commodity. The objective is to encourage the trade to observe the Good Agriculture Practice so as to ensure that only the minimum amount of pesticide is applied to food for achieving pest control need. Hence, the MRL of a pesticide is not equivalent to the safety reference value for acceptable intake of pesticide by human. Therefore, the DH currently adopts the ADI instead of the MRL to assess the health risk of pesticide residues in Chinese herbal medicines.

The DH has all along been committed to promoting the safe use of Chinese herbal medicines with the emphasis that Chinese herbal medicines have to be used according to one's body constitution and medical condition. Hence, we suggest that the public should consult Chinese medicine practitioners before taking Chinese herbal medicines, and follow the instructions of the Chinese medicine practitioners when preparing decoctions of and consuming Chinese herbal medicines.

The DH will continue to ensure the safety of Chinese herbal medicines through the existing regulatory and surveillance mechanism, including carrying out relevant tests for pesticide residues and heavy metals. We will also maintain close liaison with the regulatory authorities in the Mainland and enhance the exchange of information on Chinese herbal medicines in accordance with the established communication mechanism.

Yours sincerely,



(Fiona CHAU)

for Secretary for Food and Health

c.c. Director of Health

(Attn: Assistant Director (Traditional Chinese Medicine))