



HONG KONG RETAIL MANAGEMENT ASSOCIATION

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Presentation to LegCo Panel on Food Safety and Environmental Hygiene and Panel on Environmental Affairs

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Proposed Reorganization Plan for the Food Safety Regulatory Framework

(by Mr Philippe Giard)

I am Philippe Giard representing the Hong Kong Retail Management Association (HKRMA).

The HKRMA supports the government's initiative in this reorganization of these important functions.

We are of the view that the current Food & Environmental Hygiene Department (FEHD) is too diverse and the formation of the proposed 'Department of Food Safety, Inspection & Quarantine' (DFSIQ) is more appropriately focused and provides for a 'one stop shop' when it comes to food safety.

The reorganization of the Agriculture, Fisheries & Conservation Department (AFCD) with the FEHD into the DFSIQ and the Department of Agriculture & Environmental Hygiene (DAEH) will avoid potential conflicts of interests, by separating regulatory enforcement from the management & development of agriculture & wholesale/retail markets.

The HKRMA welcomes the initiative to set up 'special teams' with interdisciplinary expertise and these teams need to focus their work based on risk assessment as to what type of food, where it comes from and what the potential risks are. As recent events have shown, better communication & cooperation with the authorities and the food supply chain in Mainland China is critical.

Food Safety is a multidisciplinary function and it is appropriate that a ‘Centre for Food Safety’ (CFS) be established to provide focus and to establish a centre of excellence. The CFS should not only consist of medical Doctors; but **also of experienced Food Scientists**, Microbiologists, Toxicologists and Nutritionists. Expertise should be recruited not only from within the government, but **also from the food industry and academia**, thereby combining regulatory expertise & pure science with ‘hands on’ **applied expertise**. This multidisciplinary approach should help ensure that the government’s policy & regulatory decisions yield the best results through a workable & practical approach to food safety issues.

The five branches to be set up covering Risk Assessment, Food Surveillance, Licensing & Inspection, Veterinary & Quarantine and Strategy & Administration are supported as is the proposed reporting structure to the CFS & DFSIQ.

The creation of a Permanent Secretary for Food Safety & Environmental Hygiene within the Health, Welfare & Food Bureau (HWFB) should provide a **better point of focus for food safety within the Bureau** and is welcomed by the HKRMA.

The proposal to establish a **Food Standards Committee is a significant step forward**. The committee should include not only academics and government experts, but also experts from the Trade who have a very detailed knowledge of food supply locally, on the mainland & Internationally.

The new DFSIQ should take the opportunity of **working more closely with the trade** and exploit the synergies that exist. In many other jurisdictions, the trade plays a critical role in maintaining food safety standards and it is very much in the trade’s interest to do so.

The HKRMA hope that the government will use this restructuring to take a fresh approach to regulatory issues relating to food safety. **Introducing regulation before it can be complied with must be avoided, as it is not in the interests of the public**, the trade, or indeed the government. By actively engaging the trade to gain a thorough understanding of all relevant issues is important and **acting on the information is critical**.

Specifically, we are of the view that:

1. **A nominated member of the HKRMA sit on the newly formed Food Standards Committee.**

2. A Food Safety Task Force be set up with the HKRMA & other stakeholders to better handle future food scares/crisis

Prosecutions have a role, but are not the way to move food safety forward. Working within the food supply chain both locally & Internationally with governments & the trade to solve food safety problems at source, is the approach that will bring most benefits to Hong Kong consumers in terms of food safety and we trust this reorganization will facilitate this process.

Thank you.

Philippe Giard

Member

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