

**立法會**  
**Legislative Council**

LC Paper No. CB(2) 863/05-06(02)

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

**Views and suggestions given by deputations  
on the reorganisation plan for the food safety regulatory framework and  
integration of nature conservation with environment protection functions  
at the joint meetings on 15 December 2005 and 6 January 2006**

**Part I : Comments on the Administration's reorganisation proposal**

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
<b>A. Representatives of staff from affected departments</b>	
Hong Kong Chinese Civil Servants' Association Food and Environmental Hygiene Foreman Branch [CB(2) 690/05-06(01)]	<u>Supported</u> the proposal to re-organise the food safety regulatory framework.  <u>Expressed reservation</u> about setting up a new Department of Agriculture and Environmental Hygiene (DAEH) to take up the responsibilities to promote and develop agriculture and fisheries activities together with maintaining environmental hygiene, as these were unrelated functions. The Administration should set up a dedicated department for maintaining environmental hygiene instead.
Hong Kong Food and Environmental Hygiene Supervisory Staffs Union [CB(2) 690/05-06(02)]	<u>Supported</u> the proposal to re-organise the food safety regulatory framework and establish a Centre for Food Safety (CFS).

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p><u>Expressed reservation</u> about the establishment of DAEH, as promotion and development of agriculture and fisheries activities and maintaining environmental hygiene were unrelated services. The name of DAEH was also misleading. Of the 10 000 staff working in DAEH, only some 200 agricultural and fisheries staff would be transferred from AFCD to DAEH.</p> <p><u>Suggested</u> that a dedicated department should be set up to take up responsibilities relating to environmental hygiene.</p>
<p>Hong Kong Food and Environmental Hygiene Department Employees Association [CB(2) 690/05-06(03)]</p>	<p><u>Supported</u> the proposal to reorganise AFCD and FEHD for better protecting public health, but more details of the proposal should be provided as soon as possible.</p>
<p>Food and Environmental Hygiene Department Foremen Grade Staff General Union [CB(2) 690/05-06(04)]</p>	<p><u>Strongly opposed</u> the proposed reorganisation of FEHD and AFCD. The proposal sought to create senior posts instead of strengthening the support for enhancing food safety. Upon reorganization, the new DAEH would have over 10 000 staff, with the bulk from FEHD and some 200 staff from AFCD. The Union did not see the rationale of the proposed merging, as the responsibilities of AFCD staff were entirely different from those performed by FEHD staff. It was unnecessary to rename FEHD to DAEH simply because of the transfer of some 200 staff from AFCD, and this would be a waste of public money.</p> <p><u>Suggested</u> that a dedicated department should be set up to take up responsibilities relating to environmental hygiene. To better utilise the existing human resources, the Administration should deploy health inspectors of environmental hygiene teams to perform food safety</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	inspections.
Hong Kong Food and Environmental Hygiene Department Management and Law Enforcement Staff Association [CB(2) 690/05-06(05)]	<p><u>Suggested</u> that the new DAEH should be renamed as Environmental Hygiene, Fisheries and Conservation Department (環境衛生漁護署) to better reflect its major functions and responsibilities, given the very small establishment of agricultural and fisheries staff in the new department.</p>
Agriculture, Fisheries and Conservation Department Staff Association [CB(2) 690/05-06(06)]	<p>While the AFCD Staff Association and the Agricultural Officer and Fisheries Officer Grades <u>supported</u> the proposal to pool together resources for enhancing food safety, they <u>opposed</u> the reorganisation proposal.</p>
All Members of the AFCD Agricultural Officer and Fisheries Officer Grades [CB(2) 690/05-06(06)] [CB(2) 690/05-06(07)] [CB(2) 710/05-06(06)]	<p>To enhance food safety, the Administration should model on international practice and adopt a comprehensive and integrated approach in food chain management (i.e. the implementation of the “From Feed to Table” concept) by establishing CFS under the purview of AFCD, instead of segregating AFCD’s functions on regulation and facilitating the development of local agriculture and fisheries activities.</p> <p>The Staff Association <u>expressed grave concern</u> that the interest of some 200 staff would be ignored after they were transferred from AFCD to the new DAEH.</p> <p>Agricultural Officer and Fisheries Officer Grades pointed out that there would be no agriculture and fisheries profession upon reorganisation. They <u>suggested</u> that the Administration should form an expert group to study the reorganization proposal in detail.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
All Government Veterinary Officers [CB(2) 690/05-06(08)] [CB(2) 710/05-06(07)]	<p>Veterinary Officers of AFCD and FEHD <u>agreed</u> to the proposal to pool together existing resources for food safety and establishment of CFS. However, they <u>disagreed</u> with the arrangement of splitting up AFCD's existing functions and transferring them to three different departments. Such arrangement would depart from the principle of adopting a comprehensive and integrated approach in food chain management, i.e. the "From Feed to Table" concept.</p> <p><u>Suggested</u> that all disciplines involved in food safety should be integrated into a single food safety agency. The proposed organisational structure of the food safety agency was attached to CB(2) 690/05-06(08).</p> <p><u>Strongly urged</u> that the Administration should get greater veterinary involvement in all aspects of food safety and public health, and also veterinarians in policy-making, so as to ensure adequate planning, design, implementation and supervision of veterinary public health programmes, and appropriate integration and collaboration with human health programmes.</p>
Hong Kong Chinese Civil Servants' Association Environmental Protection Officer Branch [CB(2) 690/05-06(09)]	<p><u>Expressed concern</u> that -</p> <ul style="list-style-type: none"><li>(a) the transfer of AFCD's functions on nature conservation and country/marine parks to the Environmental Protection Department (EPD) would undermine the latter's core functions in protecting the deteriorating environment;</li><li>(b) EPD's existing resources would be overly stretched to cater for the additional staff from AFCD, as the size of EPD would be doubled after the transfer took effect.</li></ul>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
<b>B. Agriculture and fisheries trades</b>	
<p>Joint Committee of Hong Kong Fishermen's Organizations [CB(2) 699/05-06(01)]</p>	<p><u>Supported</u> the proposal of establishing CFS, but <u>opposed</u> the dissolution of AFCD and the establishment of DFSIQ.</p> <p>Expressed <u>concern</u> that upon reorganization, there would be no dedicated department looking after the interest of and providing ready assistance to the fisheries industry, as the major functions of the new DFSIQ were inspection, quarantine and regulation of food products.</p> <p><u>Considered</u> that the most effective way to enhance food safety was the implementation of "From Feed to Table" concept, and that CSF should be formed under AFCD.</p> <p><u>Questioned</u> that the reorganization proposal might breach Article 119 of the Basic Law.</p>
<p>Federation of Hong Kong Aquaculture Associations [CB(2) 710/05-06(01)]</p>	<p><u>Strongly opposed</u> the establishment of DFSIQ as the new department was tasked to regulate the agriculture and fisheries industries, and not to promote and facilitate the development of agriculture and fisheries activities. <u>Questioned</u> the cost-effectiveness of the reorganisation plan which would incur an additional recurrent expenditure amounted to \$150 million per annum.</p> <p><u>Considered</u> that AFCD was playing a very important role in the development of agriculture and fisheries activities.</p> <p><u>Considered</u> that the most effective way to enhance food was the implementation of "From Feed to Table" concept, and that CSF should be</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p>formed under AFCD.</p>
<p>Hong Kong Fishermen's Association [CB(2) 699/05-06(02)]</p>	<p><u>Opposed</u> the establishment of DFSIQ as the new department was tasked to regulate the agriculture and fisheries industries, and not to promote and facilitate the development of agriculture and fisheries activities.</p> <p><u>Considered</u> that the most effective way to enhance food safety was the implementation of "From Feed to Table" concept, and that CSF should be formed under AFCD.</p>
<p>Hong Kong and Kowloon Fishermen Association Limited</p>	<p><u>Opposed</u> the proposal to dissolve AFCD as the department had acquired good understanding of the agriculture and fisheries sector.</p> <p><u>Considered</u> that the most effective way to enhance food safety was the implementation of "From Feed to Table" concept, and that CSF should be formed under AFCD.</p>
<p>New Territories Fishermen Fraternity Association [CB(2) 710/05-06(02)]</p>	<p><u>Opposed</u> the proposal of establishing DFSIQ to take up the regulatory functions and DAEH to promote and facilitate development of agriculture and fisheries activities. <u>Expressed concern</u> that there would be no agriculture and fisheries policy upon reorganization.</p> <p><u>Considered</u> that CFS should be formed under AFCD, to minimise unnecessary disruption to the agriculture and fisheries sector. The arrangement would facilitate AFCD to implement the "From Feed to Table" concept.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
Sai Kung Fishermen's Association [CB(2) 710/05-06(03)]	<p><u>Agreed</u> to the need to enhance food safety, which should be effected by the implementation of the "From Feed to Table" concept. <u>Expressed concern</u> that the interest of the agriculture and fisheries industry would be undermined upon reorganisation.</p> <p><u>Strongly opposed</u> the formation of DFSIQ and the transfer of AFCD's existing functions to DFSIQ, DAEH and EPD.</p> <p><u>Considered</u> that CFS should be formed under AFCD.</p>
Hong Kong Livestock Industry Association, and Hong Kong Pig Raising Development Federation [CB(2) 690/05-06(10)]	<p><u>Considered</u> that AFCD possessed the professional knowledge and experience to implement the "From Feed to Table" concept. It was inappropriate for non-professional staff to assume overall responsibility for public health and related inspection and quarantine matters.</p> <p><u>Strongly opposed</u> to the dissolution of AFCD. It would be more appropriate for veterinarians to take the lead in food safety matters. <u>Suggested</u> that CFS should be formed under AFCD.</p>
Hong Kong Pigfarm Association	<p><u>Strongly opposed</u> the reorganization proposal as it attached less importance to the agriculture and fisheries sector.</p> <p><u>Expressed concern</u> that upon reorganization, the promotion and development of agriculture and fisheries activities would come under senior officials who did not have the professional knowledge and experience in the field. The proposal also violated Article 119 of the Basic Law.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p><u>Considered</u> that no organisational change should be made to AFCD, and that CFS should be formed under AFCD.</p>
<p>The New Territories Chicken Breeders Association Limited [CB(2) 690/05-06(11)]</p>	<p><u>Strongly opposed</u> the proposal to reorganize AFCD as it would cause negative impact on the agriculture and fisheries industry. AFCD's existing functions over regulating and promoting the development of agriculture and fisheries activities should continue to be assumed by one department. Otherwise, it would undermine the support of AFCD to the industry.</p> <p><u>Suggested</u> that to ensure food safety, AFCD should take the lead in implementing the "From Feed to Table" concept, and CFS should be formed under AFCD.</p>
<p>World's Poultry Science Association Hong Kong Branch [CB(2) 710/05-06(04)]</p>	<p><u>Considered</u> that the most effective way to ensure food safety was to exercise control at source. The operational responsibilities over inspection and quarantine, and promotion of development of agriculture and fisheries activities should come under one single department. CFS should be overseen by officials who had professional knowledge and experience in public health and food safety.</p> <p><u>Supported</u> that CFS should be formed under AFCD.</p>
<p>Agriculture and Fisheries Technology Promotion Association [CB(2) 710/05-06(05)]</p>	<p><u>Strongly against</u> the reorganization proposal. The "From Feed to Table" concept implemented by AFCD had proven effective and was the best way to enhance food safety. AFCD should remain intact, with expanded activities on food safety surveillance. CFS should be formed under AFCD.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
港九花卉職工總會 [CB(2) 699/05-06(03)]	<p><u>Expressed concern</u> that upon reorganization, the interests of the agriculture industry, which was currently looked after by AFCD, would be ignored. It <u>urged</u> that long-term agriculture policy and strategy should be formulated.</p> <p><u>Questioned</u> whether the reorganization proposal breached the Basic Law.</p> <p><u>Suggested</u> that the responsibilities of DFSIQ relating to food safety matters should be taken up by AFCD.</p>
The Federation of Vegetable Marketing Co-operative Societies, Limited [CB(2) 690/05-06(12)]	<p><u>Opposed</u> the proposal to re-organise AFCD and transfer AFCD's existing functions to three departments.</p> <p><u>Agreed</u> that the most effective way to ensure food safety was control at source. CFS should be formed under AFCD.</p>
香港有機農業協會	<p><u>Considered</u> that the food chain management, i.e. the "From Feed to Table" concept, should be adopted to ensure food safety.</p> <p><u>Suggested</u> that CFS should be formed under AFCD so that AFCD could continue to play the role to promote and develop agriculture and fisheries activities.</p>
<b>C. Academics/experts</b>	
Hong Kong Medical Association	<p><u>Strongly supported</u> the formation of CFS to regulate all matters related to food safety. <u>Supported</u> the proposal to separate regulatory from facilitation functions.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
Hong Kong Dietitians Association	<p><u>Strongly supported</u> the reorganization plan and the establishment of CFS.</p> <p><u>Considered</u> that the Administration should work together with experts and professionals to enhance food safety.</p>
Hong Kong Nutrition Association	<p><u>Fully supported</u> the formation of DFSIQ and DAEH which would make the work on regarding food safety inspection and control more focused.</p> <p><u>Suggested</u> that the Administration should allocate more resources for public education on food safety.</p>
Hong Kong College of Community Medicine / Hong Kong Academy of Medicine [CB(2) 790/05-06(02)]	<p><u>Supported</u> the Administration’s proposal to strengthen the food safety regulatory framework, by separating the functions of regulation and facilitation as this would avoid conflict of roles.</p> <p>While <u>supporting</u> the “From Feed to Table” concept, it was unnecessary to have one single organisation to take up the work on all areas along the food supply chain.</p>
Hong Kong Veterinary Association [CB(2) 790/05-06(03)]	<p><u>Supported</u> the formation of DFSIQ. The new department should be led by a “Chief Veterinary Officer”, and more veterinary professionals should be involved in the policy-making process.</p>
Professor Thomas Y K CHAN Department of Medicine and Therapeutics The Chinese University of Hong Kong [CB(2) 790/05-06(04)]	<p><u>Recognized</u> the following <u>merits</u> in the reorganisation plan –</p> <p>(a) there would be one dedicated department, i.e. DFSIQ, with primary responsibility for food safety across the entire food chain;</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p>(b) the responsibilities and infrastructure of DFSIQ and its five branches as well as CFS were well defined. Overlapping of responsibilities across various departments and units as well as conflicting roles of regulation and facilitation would be avoided; and</p> <p>(c) the reorganisation would allow the Administration to pool the manpower and resources, and to coordinate the efforts in promoting food safety.</p> <p><u>Considered</u> that the Administration should establish excellent communication and cooperation with the Mainland regarding food safety and source management, since the Mainland was our major supplier of poultry, livestock, aquaculture produce and other food. To enhance the food regulatory framework, there should be greater participation of the relevant industry/trade, consumers, academics and experts in various scientific committees.</p>
<p>Professor KWAN Hoi-shan Director of Studies Food and Nutritional Sciences Programme The Chinese University of Hong Kong</p>	<p><u>Expressed support</u> for the reorganization plan.</p> <p><u>Considered</u> that as Hong Kong relied heavily on imported food, it was very important to put in place an effective food regulatory mechanism. It was on the right track to separate the functions of regulation and facilitation. Government officials specialised in food surveillance should enhance cooperation with experts and professionals from the industry to strengthen the food regulatory framework.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
<p>Head, Department of Community Medicine Faculty of Medicine The University of Hong Kong [CB(2) 807/05-06(01)]</p>	<p><u>Strongly welcomed</u> the reorganisation proposal to enhance food safety and protect public health.</p> <p><u>Agreed</u> to the proposed separation of regulatory functions from facilitation functions. The formation of CFS would provide opportunities for a more focussed approach to controlling and regulating food safety.</p> <p><u>Welcomed</u> adoption of a multi-disciplinary approach for food safety control, and non-government professional and academic organizations should also be involved. <u>Suggested</u> that funding should be provided for training and research, and also development on food safety.</p>
<p>Dr Frederick LEUNG Associate Professor, Department of Zoology The University of Hong Kong [CB(2) 790/05-06(05)]</p>	<p><u>Considered</u> it a good idea to form DFSIQ, and to step up the regulation and inspection work related to food safety.</p> <p>As food safety was a complex issue, the reorganisation could not solve all the problems simply by realignment of sections/departments and redeployment of staff and resources among different departments. A full management audit should also be carried out. The implementation of the “From Feed to Table” concept did not necessarily mean that the regulatory function should be assumed by one single department.</p>
<p>Hong Kong Doctors Union [CB(2) 790/05-06(01)] (written submission only)</p>	<p><u>Fully supported</u> the proposal to reorganise FEHD and AFCD into DSFIQ and DAEH, i.e. separating the regulatory function from the facilitation function.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p><u>Supported</u> the establishment of CFS within DFSIQ, so as to pool together resources for regulating food safety.</p>
<p>Association of Hong Kong Nursing Staff [CB(2) 790/05-06(07)] <i>(written submission only)</i></p>	<p><u>Supported</u> the Government's initiative in strengthening the efforts to enhance food safety and protect public health, but <u>expressed reservation</u> about the feasibility of the reorganization plan and the additional recurrent expenditure for implementation.</p>
<p>Professor Paul CHAN Kay-sheung Department of Microbiology, Faculty of Medicine, The Chinese University of Hong Kong [CB(2) 790/05-06(08)] <i>(written submission only)</i></p>	<p><u>Supported</u> the reorganization proposal that food safety issues would be overseen by a dedicated team of staff in the new DFSIQ. However, additional expenses associated with the proposal must be fully justified, monitored and reviewed.</p> <p><u>Considered</u> that the reorganization proposal should include how to better utilize experts and facilitate the development of such experts.</p>
<p>Professor WOO Jean Chairman and Professor of Medicine, Department of Community and Family Medicine, Faculty of Medicine, The Chinese University of Hong Kong [CB(2) 790/05-06(09)] <i>(written submission only)</i></p>	<p><u>Strongly supported</u> the proposal, as it was in line with the setting up of similar agencies in many developed countries to improve food safety. <u>Considered</u> that the regulation and inspection functions and the trade promotion functions should be dealt with by two different bodies. The formation of CFS would address food safety in a more focused manner.</p>
<p>Department of Microbiology, Faculty of Medicine, The University of Hong Kong [CB(2) 790/05-06(10)] <i>(written submission only)</i></p>	<p><u>Supported</u> Government's proposal to reorganise the food safety regulatory framework and to establish a dedicated new CFS responsible for food safety issues.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p><u>Considered</u> that the functions of food safety regulation and facilitating the development of the local agriculture and fisheries sectors should be carried out by two separate government departments. The segregation of regulatory and facilitation functions would avoid potential conflicts of interests that might arise if they were performed by the same department. The proposal was also consistent with the “food chain approach” to food safety and quality recommended by the Food and Agriculture Organization and implemented in many overseas countries.</p> <p><u>Considered</u> that the food safety regulatory functions under the new organisation structure should best be performed by a multi-disciplinary team that comprised medical doctors, chemists, epidemiologists, microbiologists, nutritionists, toxicologists, biotechnologists and veterinarians.</p>
<b>D Other relevant trades</b>	
<p>Hong Kong Food Council [CB(2) 790/05-06(06)]</p>	<p><u>Supported</u> that a dedicated department be formed to provide “one-stop” service for food safety issues, and the proposal of creating one additional Permanent Secretary post within HWFB.</p> <p><u>Considered</u> that the food safety regulatory framework should be premised on the “From Feed to Table” concept. The new department, which would be responsible for food safety control and regulation, should be led by professionals, including veterinarians, botanists, medical doctors and health inspectors. Appropriate training and retraining should be provided to the relevant trades.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p>The Administration should provide more information on the staffing requirements for the food safety regulatory framework.</p>
<p>Hong Kong Retail Management Association (HKRMA) [CB(2) 807/05-06(02)]</p>	<p><u>Supported</u> the proposals to reorganise the food safety functions and to create a Permanent Secretary post within HWFB.</p> <p><u>Considered</u> that the formation of DFSIQ could focus its work on risk assessment and improve communication with the Mainland and provide “one stop shop” service for food safety. The reorganisation of AFCD would avoid potential conflict of interests, by separating regulatory enforcement from management and development of agriculture and wholesale/retail markets.</p> <p><u>Suggested</u> that CFS should not only consist of medical doctors, but also experienced food scientists, microbiologists, toxicologists and nutritionist from within the government and the food industry and academia.</p> <p><u>Considered</u> that the proposal to establish a Food Standards Committee (FSC) was a significant step forward. FSC should comprise a member of HKRMA. <u>Suggested</u> that a Food Safety Task Force should also be set up with HKRMA and other stakeholders to better handle future food crisis.</p>
<p>Hong Kong Suppliers Association Limited [CB(2) 807/05-06(03)]</p>	<p><u>Supported</u> the Administration’s initiative in improving food safety and veterinary public health control, but had <u>reservations</u> about the reorganization approach which did not adequately identify the existing problems and explain how the problems could be resolved.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p><u>Supported</u> in principle the plan to exercise control at source, improve communication with the Mainland, establish CFS, DFSIQ and a FSC as well as to merge AFCD's Country/Marine Parks and Conservation Branch with EPD.</p> <p><u>Suggested</u> that representatives from the related trades should be invited to sit on FSC.</p>
<p>Hong Kong Food Science and Technology Association Limited [CB(2) 826/05-06 (01)]</p>	<p><u>Fully supported</u> the reorganisation plan for the food safety regulatory framework.</p> <p><u>Suggested</u> that more experts and professionals from the food business industry could participate in food safety management.</p>
<p>Hong Kong Foodstuff Five Guilds Concern Group</p>	<p><u>Supported</u> the proposal to set up CFS.</p> <p><u>Suggested</u> that educational programmes should be provided for the trade and the public to facilitate their understanding of the food safety regulatory framework.</p>
<p>Hong Kong Federation of Restaurants and Related Trades</p>	<p><u>Supported</u> the reorganisation plan and the proposal of forming one dedicated department for food safety regulation and control as soon as possible. The transfer of the nature conservation and country/marine parks functions of AFCD to EPD was considered <u>appropriate</u>.</p> <p><u>Suggested</u> that the Administration should reduce red tape and expedite the processing time for food business licence applications after the new regulatory framework came into operation.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
	<p><u>Considered</u> it necessary to establish an effective communication and notification system on food safety with the Mainland.</p> <p><u>Suggested</u> that FSC should include representatives from the food business industry.</p>
<p>The Association for Hong Kong Catering Services Management Limited</p>	<p><u>Supported</u> the proposal of establishing DFSIQ to provide “one-stop” service to the food business industry. The Administration should streamline and simplify the operational procedures on food safety regulation and control.</p> <p><u>Suggested</u> that FSC should comprise members from different sectors in the community.</p>
<p>Hong Kong &amp; Kowloon Fresh Fish Traders’ Association</p>	<p><u>Supported</u> the implementation of the “From Feed to Table” concept and regulation at source for protection of public health.</p>
<p>Hong Kong Vegetable Wholesaler Community</p>	<p><u>Suggested</u> that the Administration should enhance cooperation with the trade to exercise more effective control at source.</p>
<p>Hong Kong Egg Merchants Association</p>	<p><u>Supported</u> the Administration’s proposal to reorganise the existing departments and regulatory functions over food safety. The Administration should continue to provide the trade with a business friendly environment, facilitating the development of different food businesses.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
The Hong Kong Kowloon Fruit & Vegetable Employees & Employers Guild	<u>Welcomed</u> the reorganization plan as this could better ensure food safety and public health.
Overseas Imported Fruits and Vegetables Association	<u>Supported</u> the initiative to enhance food safety for protection of public health, and the establishment of CFS, but had <u>reservation</u> about the disintegration of AFCD, as AFCD maintained close working relationship with the food wholesalers. Regulation of food wholesaling should continue to be carried out by AFCD.
Federation of Hong Kong Kowloon New Territories Hawker Associations	<u>Supported</u> the initiative to strengthen regulatory control over food products.
Hong Kong Poultry Wholesalers Association	<u>Supported in principle</u> the Administration's initiative in improving food safety and imposing regulatory control.  <u>Suggested</u> that experts and representatives from the food business industry should be invited to join FSC.
香港飲食業聯合總會 [CB(2) 790/05-06(11)] <i>(written submission only)</i>	<u>Welcomed</u> the formation of DFSIQ and the implementation of the "From Feed to Table" concept for food safety.  <u>Considered</u> that prosecution was not the only way to enhance food safety. The Government should balance food safety control with the interests of the trade.

**Part II : Consultation with affected departments and stakeholders**

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
Hong Kong Food and Environmental Hygiene Department Management and Law Enforcement Staff Association [CB(2) 690/05-06(05)]	<p><u>Expressed dissatisfaction</u> that there was no consultation with the relevant staff associations prior to the promulgation of the reorganisation plan.</p>
Agriculture, Fisheries and Conservation Department Staff Association All Members of the AFCD Agricultural Officer and Fisheries Officer Grades [CB(2) 690/05-06(06)] [CB(2) 690/05-06(07)] [CB(2) 710/05-06(06)]	<p><u>Expressed dissatisfaction</u> that the Administration had not consulted the affected departments before promulgating the reorganisation plan. Although a few briefing sessions were held subsequently on the reorganisation plan, the management was unable to provide answers to some questions raised by attendees. They urged that the Administration should fully take note of the concerns and views expressed by staff members.</p>
Hong Kong Chinese Civil Servants' Association Environmental Protection Officer Branch [CB(2) 690/05-06(09)]	<p><u>Expressed dissatisfaction</u> with the approach the Administration had dealt with the reorganization plan. The EPD staff first learnt about the reorganization plan on 9 December 2005. Given the short notice, it was unable for the staff side to discuss the proposal in detail.</p> <p><u>Requested</u> that affected staff should be given ample opportunities to express their views and comments on the proposal.</p>
Joint Committee of Hong Kong Fishermen's Organizations [CB(2) 699/05-06(01)]	<p><u>Expressed dissatisfaction</u> that the Administration had not consulted the fisheries industry before putting forward the reorganisation plan.</p>

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
Hong Kong Fisheries Alliance	<u>Requested</u> that the Administration should explain in detail the merits of the proposal to the agriculture and fisheries industry.
Agriculture and Fisheries Technology Promotion Association [CB(2) 710/05-06(05)]	<u>Considered</u> that the Administration should take into account the staff morale and views of the affected trades before proceeding with the reorganization plan.
港九花卉職工總會 [CB(2) 699/05-06(03)]	<u>Considered</u> that the Administration should consult the agriculture and fisheries industry before taking forward the proposal.
Dr Frederick LEUNG Associate Professor, Department of Zoology The University of Hong Kong [CB(2) 790/05-06(05)]	<u>Considered</u> that all stakeholders should be fully consulted before the reorganisation plan was finalized and implemented, in view of the grave concerns expressed by Government Veterinary Officers.
Association of Hong Kong Nursing Staff [CB(2) 790/05-06(07)] <i>(written submission only)</i>	<u>Considered</u> that the Administration should fully consult all the stakeholders and the trade, before finalising the details of the reorganisation plan.

**Part III : Other related issues**

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
Hong Kong Chinese Civil Servants' Association Food and Environmental Hygiene Foreman Branch [CB(2) 690/05-06(01)]	The Administration should assure the affected staff that their conditions of service would not be affected upon reorganisation.  The Administration should take the opportunity to solve the problem of staff shortage in the health inspector, hawker control officer and foremen grades.
Hong Kong Food and Environmental Hygiene Supervisory Staffs Union [CB(2) 690/05-06(02)]	The Administration should assure the affected staff that their conditions of service would not be affected upon reorganisation.
Hong Kong Food and Environmental Hygiene Department Employees Association [CB(2) 690/05-06(03)]	The Administration should assure staff that the reorganisation plan was not a staff redundancy exercise. It should let the affected staff know as early as possible the organisational structure of the new departments, in particular whether their promotion prospects would be jeopardised. Training should also be provided to the affected staff to undertake new duties, if so required.  Consideration should be given to converting the temporary staff currently engaged by AFCD to permanent staff.
Food and Environmental Hygiene Department Foremen Grade Staff General Union [CB(2) 690/05-06(04)]	As the new DAEH was mainly responsible for maintaining environmental hygiene, it would be more cost-effective for the Administration to first solve the problem of staff shortage in the health inspector grade in FEHD than taking forward the reorganisation plan.

<b>Organisations (LC Paper No. of submission if applicable)</b>	<b>Views and/or suggestions given</b>
Hong Kong Food and Environmental Hygiene Department Management and Law Enforcement Staff Association [CB(2) 690/05-06(05)]	The Administration should take the opportunity to review the tight staffing situation of the health inspector grade in FEHD. To solve the problem, Senior Overseers could be deployed to undertake some of the duties originally discharged by health inspectors.  The post titles of the foremen grade should be changed to better reflect their expanded responsibilities.

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