



HONG KONG RETAIL MANAGEMENT ASSOCIATION

**Views on the Legislative Proposals on the Regulation of Edible Fats and Oils and
Recycling of “Waste Cooking Oils”**

7 September 2015

The HKRMA supports the Government’s intention to regulate with regard to the setting up of quality standards for edible oils imported into, or manufactured in Hong Kong along with the recycling of waste cooking oils. This is appropriate following the recent incident involving substandard lard from Taiwan.

However, the Association maintains that it is important that any new regulation in addition to protecting public health does not become a trade barrier or obstacle restricting Consumer Choice and adding to food inflation.

The views of the HKRMA are as follows:

1. Waste oil collection & recycling

We support the proposals for waste oil collectors and waste oil recyclers to be licensed, provided the Government ensures that enough licensed collectors and licensed recyclers are available to cope with demand and to ensure an element of competition so waste oil collection costs do not substantially rise as a result of the new licensing requirement.

2. Standards for Edible Fats & Oils

We support the setting up of standards to protect public health and the proposals appear reasonable.

3. Certification of Imported edible Oils

Hong Kong is a small market for food importers around the world but at the same time is unique in that there is a wide variety of foods available for consumers to choose from both in retailers and at catering outlets this including edible oils. The large range of ‘gourmet’ oils that are available include an array of very high quality ‘Extra Virgin Olive Oils’, and other specialist oils (including capsulated health food oils) together with mainstream oils from around the World. It is essential that this situation is maintained in order to preserve and further develop Hong Kong as a ‘Gourmet Paradise’ for both locals and visitors alike.

The Government needs to be cautious that any new regulation design to protect public health from substandard recycled waste oil does not have an impact on high quality ‘Gourmet Oils’ prized for their delicate and unique sensory characteristics and would certainly not be substandard/recycled waste oil.

The proposed requirement for testing certification for all imported edible oils will have severe cost implications (estimated to be per sample: HK\$3,600 for oils & HK\$800 for lard), adding to food



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inflation. This cost is compounded by the large range of small volume edible oils available in Hong Kong and is on a 'per batch/import shipment' basis.

Exporting countries will generally only issue certification in the form of 'Health Certificates' based on physical inspection rather than chemical analysis and are formulated on the basis of mutual recognition and international norms. Competent Health Authorities of exporting countries may refuse to issue Certification according to the Hong Kong proposed requirements resulting in very high analytical costs being incurred when importing small volume product such as 'Extra Virgin Olive Oils', Capsulated Health Oils, etc, into Hong Kong. Additionally, we are not aware of any incident in Hong Kong involving imported edible oils from areas other than Taiwan & Mainland China.

We consider it therefore unnecessary to implement such mandatory certification requirements to combat substandard oils, on imports of high quality edible oils from outside of Taiwan and Mainland China when there has never been and is no problem with their quality or safety. On the contrary, these oils are the best quality the World can produce and are often famed in their use in gourmet restaurants and homes.

HKRMA's Proposal on Certification

The proposed Standard for imported edible oil be implemented without the mandatory certification requirement, but it will be the legal responsibility of importers to ensure that the edible oil they bring into Hong Kong conforms to this standard. This is the same for all other foods that have standards such as those foods listed in the Hong Kong regulations concerning Metallic Contaminants, Preservatives, Nutritional labeling etc., except those foods that require a Health Certificate which are generally considered as high risk foods such as raw meat, ice cream etc.

Edible oil cannot be considered as a high risk food as it does not require Health Certification. The Centre for Food Safety may target their monitoring of imported edible oils through their risk assessment program and prosecute any importer found to have violated the standard.

We urge the Government to carefully consider the above and to amend their proposed regulation accordingly.

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About HKRMA

The Hong Kong Retail Management Association (HKRMA) was founded in 1983 by a group of visionary retailers with a long-term mission to promote Hong Kong's retail industry and to present a unified voice on issues that affect all retailers. Established for 32 years, the Association has been playing a vital role in representing the trade, and raising the status and professionalism of retailing through awards, education and training.

Today, HKRMA is the leading retail association in Hong Kong with membership covering more than 7,800 retail outlets and employing over half of the local retail workforce. HKRMA is one of the founding members of the Federation of Asia-Pacific Retailers Associations (FAPRA) and is the only representing organization from Hong Kong. FAPRA members cover 17 Asian Pacific countries and regions.