LEGISLATIVE COUNCIL PANEL ON HEALTH SERVICES
(meeting of 8 May 2000)

FOOD SAFETY CONTROL IN HONG KONG - AN OVERVIEW

Introduction

The overall objective of food safety control is to ensure that food products are hygienic, safe and fit for human consumption. This paper provides a brief introduction of the current food safety control system in Hong Kong.

Main Components

2. The food safety control framework in Hong Kong consists of the following main components: -

(a) Food safety legislations.
(b) Safety control of imported food.
(c) Food surveillance.
(d) Risk assessment.
(e) Safety control of live food animals.
(f) Management of food incidents.
(g) Risk Communication.

3. Prior to the re-organization of the provision of municipal services, enforcement of food safety legislations and the carrying out of food surveillance and import control were exercised by the Department of Health (DH), which followed closely the traditional food safety control model recommended by the World Health Organization (WHO) dating back to the 60s. The emphasis is placed on end-product inspection through food surveillance at points of import and in the market.

4. With the increasing sophistication of the food production/manufacturing industry and the advancement of food science and medical knowledge, limitations of the traditional model become more and more apparent. With its emphasis on end-product inspection, the model is reactive as in most cases, the food in question would have already been consumed by the time test results are available. As a result, the WHO started to promote a more process-oriented and risk-based control model from the mid-90s.

5. With the establishment of the new Food and Environmental Hygiene Department (FEHD) on 1 January 2000 and the vesting of power to the Director as the food authority, we have made organizational and infrastructural changes to our regulatory framework for food safety control. The new framework, which is based on the new model promulgated by the WHO, excels the old one in at least two areas:

(a) it seeks to prevent the occurrence of food incidence at source and therefore more proactive; and

(b) it encourages partnership, responsibility sharing and documentation among all stakeholders, i.e. the Government, the food trade and the consumers.

The following paragraphs describe how we organize our work and how each component mentioned in paragraph 2 above contributes to food safety assurance.

Food Safety Legislation

6. Most food safety related rules and regulations are contained in Part V (Food and Drugs) of the Public Health and Municipal Services Ordinance, Cap. 132. This main Ordinance provides for, inter alia, general protection of consumers against food not of the nature, substance or quality demanded by the purchaser. It stipulates the offences against sale of food which is unfit for human consumption, and empowers authorized public officers to seize, remove and destroy food which is unfit for human consumption. Its subsidiary regulations prescribe detailed rules on food standards, import food control measures, etc. A list of these subsidiary regulations is at Annex A.

Safety Control of Imported Food

7. As a member of the World Trade Organization and following its Agreement on the Application of Sanitary and Phytosanitary Measures, we have adopted the policy and practice for imposing all control measures on imported food solely on public health grounds and on the basis of scientific evidence. The extent of control varies depending on the health impact of individual food categories.

8. Import of perishable products, which include milk, milk beverages, frozen confections, game, meat and poultry, has to be accompanied by official health certificates issued by recognized overseas authorities. Importers are

also required to notify or/and seek the authority's (i.e. the Director of FEHD) prior approval before the actual importation takes place. Inspection and random sampling are carried out at points of import and products which do not comply with local safety standards are rejected.

9. Vegetables imported from the Mainland must be accompanied by official pesticide declaration forms. Random samples are taken from vegetable vehicles going through the Man Kam To Control Point. The sampled vegetables are subject to laboratory tests on pesticide residues with positive results initiating immediate recall.

10. Seafood, being more liable to bacteriological and chemical contamination, is also considered as a high-risk food. It is hence one of our priority items of random inspection and sample testing at import control points. In particular, under the agreement between the Administration and the seafood trade, importers of coral reef fish from "high-risk" harvest zones (i.e. where ciguatoxin has been found previously) need to submit prior fish samples to FEHD for testing. Importation only takes place after the samples are tested as ciguatoxin free. For coral reef fish from other harvest zones, the trade notifies FEHD upon the importation and the latter takes random samples after their arrival in Hong Kong.

11. To ensure the imported food is safe, we undertake and maintain close liaison with health/food authorities of our major exporting countries to make sure that their food production is governed by sound safety standards.

Food Surveillance

12. Food surveillance involves ongoing and systematic collection, analysis and interpretation of data on food hazards through the process of random food sampling. We have two specific objectives in conducting the food surveillance programme: -

(a) To ensure food on sale is safe for human consumption - the programme covers all food items available in the market, with priorities given to high-risk food, products which are subjects of complaints, and items suspected to be related to food poisoning cases. Food samples collected are subject to chemical tests (mainly on additives and contaminants), microbiological tests (mainly on bacteria and virus), or radioactive tests (mainly to monitor the prevalent level of radioactivity in our food supply) depending on their nature and associated risks. While the international reference for surveillance intensity is 3 samples per

1,000 population per annum, we have consistently achieved an intensity of 8 samples per 1,000 population per annum over the years.

(b) To ensure prepackaged food is properly labelled - the purpose of food labelling is to provide a means for the food industry to communicate to the consumers and for the latter to make an informed choice. Random inspections are carried out to ensure all prepackaged food on sale is labelled in accordance with the legal requirements. Random samples are also collected for verification of the contents of the labels.

13. Based on the results of the inspection or laboratory testing, enforcement actions are taken against any person who imports or sells food not complying with the legislation. Depending on the possible health impact, these actions may include health advice, warning and prosecution.

Risk Assessment

14. Risk assessment provides the scientific basis for effective management of food safety issues and accurate communication of real and perceived risks. Since 1.1.2000, a dedicated team of medical professionals and food scientists has been set up in FEHD to take up the following duties: -

(a) Providing scientific basis for the food surveillance programme by carrying out regular reviews on the surveillance results;

(b) Conducting risk assessment and research on specific food items with priority given to high-risk foods, subjects of food incidents reported or food items of public concern;

(c) Recommending testing standards for food surveillance and enforcement purposes;

(d) Conducting daily surveillance for food incidents and carrying out follow up case assessment as necessary; and

(e) Conducting food consumption survey and related data analysis.

Safety Control of Live Food Animals

15. To ensure live food animals are safe for human consumption, we

now have a dedicated team of veterinary professionals and field officers undertaking the following duties: -

(a) Verification of health documents and identification tags/tattoos, and inspection of general health conditions of all imported food animals at points of entry;

(b) Ante-mortem inspection for each and every animal for slaughtering in slaughterhouses; and

(c) Random urine sampling of pigs for testing of beta agonists, a prohibited veterinary drug residue in meat, at slaughterhouses.

Management of Food Incidents

16. Food incident is a general term we use to describe any situation where food safety is compromised. A food incident may involve specific human victims as in the case of food poisoning, but in others, no human victims may be involved. Before the re-organization, when DH was responsible for food safety control, different types of food incidents were handled by different units in DH. The designation of a dedicated and multi-disciplinary team of professionals to handle all food-related incidents in FEHD will enhance efficiency and coordination for swift action to be taken. The team, led by a medical doctor and comprising health inspectors and nurses, cooperates closely with DH (which is responsible for treating the human victims, their food collaterals and contacts, and controlling the spread of infection in the community) to perform the following duties on reports of food incident: -

(a) Inspect the food premises and investigate the causes of the food incidents in food premises;

(b) Coordinate efforts amongst concerned government departments, local consulates, the trade and the public in case of food recall;

(c) Coordinate necessary follow up actions to public complaints and media reports on local or overseas food incidents; and

(d) Collect and analyse the food incident data for the formulation of specific food hygiene education programmes for the trade and the community.

Risk Communication

17. Food safety control is a shared responsibility among three key parties, the Government, the trade and the consumers. The concept of tripartite responsibility is illustrated in Annex B. In brief, the Government is responsible for ensuring compliance of all food safety related rules and regulations by the trade on one hand, and providing adequate information to consumers on the other. The trade has to take responsibility and exercise due diligence to ensure their products are safe for consumption. Consumers have to watch out and be aware of the risk when making purchase choice and to observe safe food practices at home.

18. Since close tripartite cooperation is essential for achieving the ultimate goal of "safe food for all", communication amongst all stakeholders is of utmost importance. Effective and efficient exchange of information reduces the chance of food incidents during ordinary times and minimizes damage during crises. We have therefore another team of medical professionals and health inspectors dedicated to carry out communication with the public and the trade:

Communication with Public

(a) Organizing programmes to promote food safety and provide information on prevention of food-borne diseases to the community;

(b) Organizing programmes to publicize the latest food surveillance and risk assessment results;

(c) Organizing programmes to collect public opinions on specific food safety issues, e.g. public forums on labelling of genetically modified food;

(d) Preparing/providing resource materials to facilitate the above risk communication programmes; and

(e) Handling public enquiries on food safety issues.

Communication with Trade

(f) Introducing and promoting the Hazard Analysis Critical Control Point (HACCP) concept to the food trade. HACCP is a preventive and proactive approach to food safety assurance recommended by WHO. With the HACCP system, food safety control is integrated into the design of food production and

manufacturing process;

(g) Assisting selected sectors of the trade to identify hazards and critical control points, set critical limits and develop monitoring/control procedures; and

(h) Assisting selected sectors of the trade to implement HACCP-based food safety programmes.

Concluding Remarks

19. While food safety control is facing more challenges as technology develops and consumers become more health conscious, we are confident that with the collaborated efforts of the Government, the trade and the consumers, the people of Hong Kong will be able to enjoy food of the highest possible level of hygienic and safety standard; and all food related risks will be properly assessed, managed and communicated.

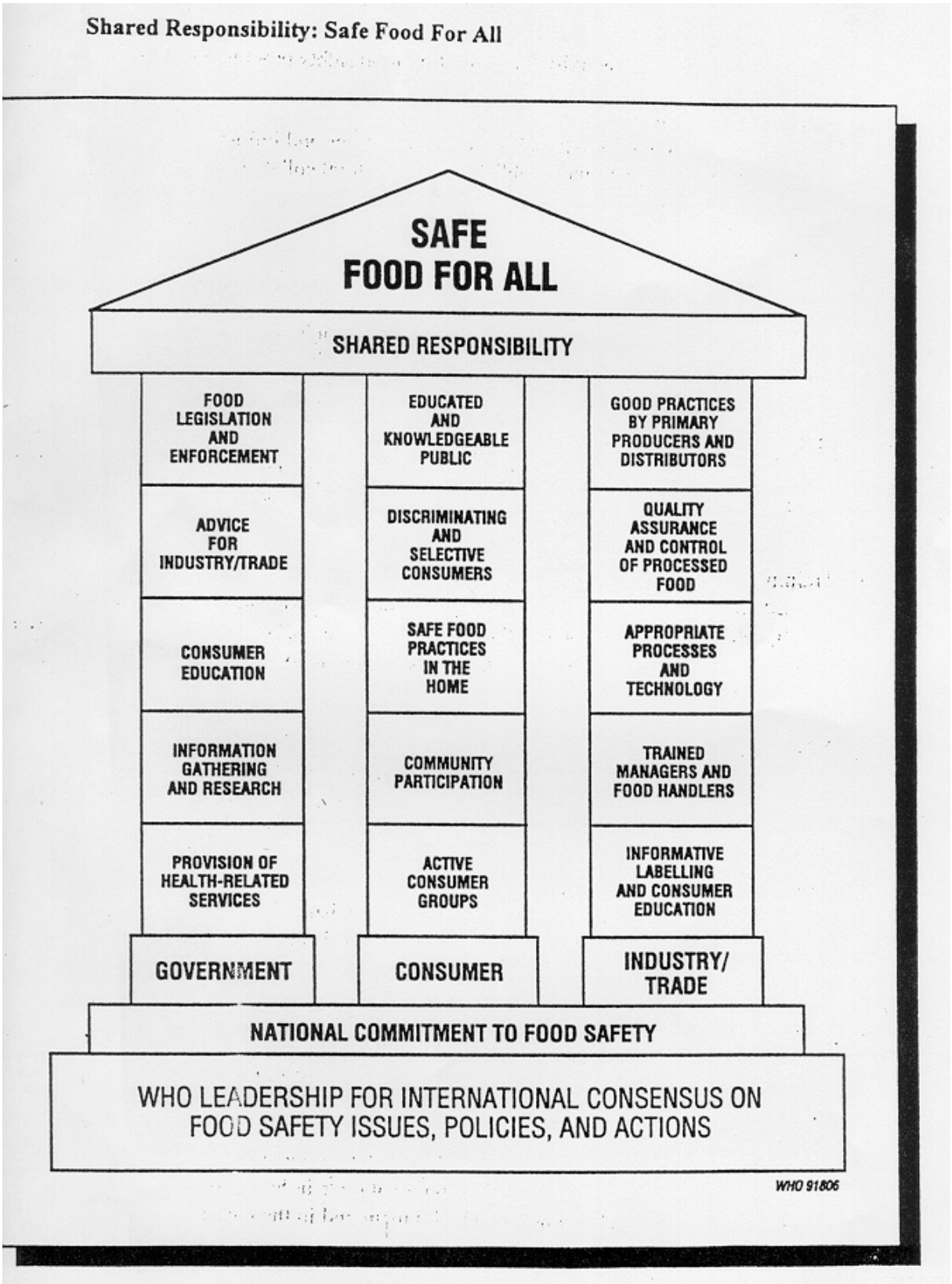
Food and Environmental Hygiene Department
May 2000

Annex A

Subsidiary Legislations under Cap. 132

Governing Food Safety

1. Colouring Matter in Food Regulations
2. Dried Milk Regulations
3. Food Adulteration (Artificial Sweeteners) Regulations
4. Food and Drugs (Composition and Labelling) Regulations
5. Frozen Confections Regulation
6. Harmful Substances in Food Regulations
7. Imported Game, Meat and Poultry Regulations
8. Milk Regulation
9. Mineral Oil in Food Regulations
10. Preservatives in Food Regulations
11. Smokeless Tobacco Products (Prohibition) Regulations
12. Food Adulteration (Metallic Contamination) Regulations



Source: Guidelines for Strengthening a National Food Safety Programme, by Food Safety Unit, Division of Food and Nutrition, WHO, 1996.