

**Advisory Council on Food and Environmental Hygiene**

**Issues Relating to the Arrangement for Import of Hairy Crabs**

**PURPOSE**

This paper briefs Members on the arrangements relating to the import and surveillance of hairy crabs in the 2017 hairy crab season, and related development.

**FOOD SAFETY CONTROL MEASURES ON HAIRY CRABS**

2. Hairy crabs sold in Hong Kong came mainly from the Mainland, while there were also hairy crabs imported from the Netherlands.
3. Hairy crabs from the Mainland must only come from aquaculture farms which are pre-approved by and registered with the General Administration of Quality Supervision, Inspection and Quarantine of the Mainland (AQSIQ)<sup>1</sup>. The Centre for Food Safety (CFS) of the Food and Environmental Hygiene Department (FEHD) makes arrangements with the Mainland inspection and quarantine authorities to conduct inspections on the aquaculture farms as and when necessary.
4. Each consignment of hairy crabs are required to be accompanied with a health certificate issued by the competent authorities of the exporting countries administratively.
5. The trade has the legal duty not to sell any food in Hong Kong that is unfit for human consumption. This applies to hairy crabs. As part of its Food Surveillance Programme, CFS, adopting a risk-based principle, takes food samples (including hairy crabs) for testing, including testing for dioxins and dioxin-like polychlorinated biphenyls (PCBs)<sup>2</sup> since 2014.

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<sup>1</sup> In view of the large proportion of foods from the Mainland in the local market, administrative arrangements between Hong Kong and the inspection and quarantine authorities of the Mainland have been put in place to safeguard the safety of food imported from the Mainland to Hong Kong. Vegetables, fruits, live aquatic animals (including hairy crabs) from the Mainland must come from registered farms in the Mainland designated for supplying those products to Hong Kong.

<sup>2</sup> Dioxin-like PCBs are PCBs the toxicity nature of which is similar to dioxins.

6. CFS set an action level of 6.5 picograms (pg) toxic equivalent per gram for dioxins and dioxin-like PCBs in hairy crabs. Details are at the [Annex](#).

## **HAIRY CRABS DETECTED WITH DIOXINS AND DIOXIN-LIKE PCBs IN 2016**

7. Three samples of hairy crabs from the Mainland were detected to have exceeded the CFS' action level on dioxins and dioxin-like PCBs in the hairy crab season in 2016. It was the first time that hairy crabs being sold in Hong Kong have exceeded CFS' action level on dioxins and dioxin-like PCBs. The CFS instructed the trade that the import into and sale within Hong Kong of hairy crabs from the two concerned aquaculture farms in Jiangsu Province (“吳江萬頃太湖蟹養殖有限公司” and “江蘇太湖水產有限公司”)<sup>3</sup> to be suspended from 1 November 2016. Prosecution actions were initiated under section 54 of the Public Health and Municipal Services Ordinance (Cap. 132) against the traders involved in the three unsatisfactory hairy crab samples.

## **COMMUNICATION WITH THE MAINLAND INSPECTION AND QUARANTINE AUTHORITIES AND THE TRADE**

8. The Food and Health Bureau and the CFS have been maintaining close liaison with Mainland inspection and quarantine authorities to follow-up on the incident. Also, following the incident, the CFS has been maintaining close liaison with the trade on CFS' work in monitoring dioxins in foods and matters relating to the import and testing arrangements of hairy crabs in the hairy crab season in 2017.

## **IMPORT ARRANGEMENT AND SURVEILLANCE FOR HAIRY CRABS IN 2017**

9. As far as hairy crabs from the Mainland are concerned, except for the two aquaculture farms in Jiangsu Province mentioned in paragraph 7 above, hairy crabs from other aquaculture farms pre-approved by and registered with the AQSIQ may export to Hong Kong. As with the existing administrative arrangement, import

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<sup>3</sup> CFS bases on the information on the health certificates concerned to identify the aquaculture farms concerned.

should be accompanied with a health certificate and CFS will continue with the checking of health certificates at import.

10. To ensure that hairy crabs for sale in Hong Kong comply with the statutory requirements and are fit for human consumption, CFS will continue to take hairy crab samples for testing, including testing of dioxins and dioxin-like PCBs. CFS will continue to adopt the action level of 6.5 picograms (pg) toxic equivalent per gram for dioxins and dioxin-like PCBs in hairy crabs in 2017. The communication on these messages with the trade has been enhanced since early 2017.

11. To minimise their business risk, to facilitate trade and restore consumers' confidence on hairy crabs, CFS will adopt farm-based sampling strategy and collect hairy crab samples at import level. CFS has also **proposed** to the trade that the trade may consider import smaller consignments of hairy crabs at the early stage of the coming hairy crab season, and voluntarily withhold the hairy crabs from entering into the market before the release of satisfactory testing results of dioxins and dioxin-like PCBs. The Government Laboratory will assist to expedite the testing process.

## **NEXT STEPS**

12. CFS will continue to keep in view the monitoring and regulatory measures over dioxins and dioxin-like PCBs in food in the international arena, surveillance results of dioxins and dioxin-like PCBs in hairy crabs, local dietary habits and other relevant factors, with a view to considering the need to prescribe the limit on the level of dioxins and dioxin-like PCBs in hairy crabs by legislation.

## **RELATED DEVELOPMENT**

13. The sale of hairy crab in accordance with Schedule 2 to the Food Business Regulation (Cap. 132X) requires written permission from FEHD, i.e. either with endorsement in food licence or a Restricted Food Permit for sale of shell fish.

14. The former Municipal Councils had not required vendors of hairy crabs to obtain licences or permits since 1970s. This is because hairy crabs, unlike live chickens or fresh pork, are seasonal food stored and sold either live in boxes or chilled in refrigerators without any prior preparation, such as processing or cooking though minimal handling is unavoidable. Therefore, they do not seem

posing any hygiene problems in both sale and storage generally. As these factors remain valid, FEHD has applied the same policy so far.

15. FEHD has been reminding the distributors/retailers selling live hairy crabs to obtain the crabs from lawful sources, to store them under refrigeration and to keep regular checks on the health of hairy crabs. Dead hairy crabs should not be sold. CFS also advises the public through various channels, such as FEHD's website and publications, to purchase hairy crabs from reliable and hygienic shops and to check whether the hairy crabs for sale are kept in a refrigerator. They are also advised to buy live hairy crabs with intact, shiny shells and no stink and to wash and cook them thoroughly before consumption to ensure food safety and hygiene. During hairy crab season, FEHD would arrange inspection to hairy crab vendors to ensure public hygiene and safety.

16. There have been calls for reviewing the present practice of not requiring written permission from FEHD to sell hairy crabs, to meet the society's expectation in protecting public health. In this regard, FEHD is planning to impose a licensing control over the sale of live hairy crabs under the Food Business Regulation (Cap. 132X) to ensure that live hairy crabs are obtained from lawful sources, live hairy crabs are being kept under refrigeration while being sold, and handwashing facilities are available at the point of sale of live hairy crabs for hygienic consideration (given that it is unavoidable for traders to pick up hairy crabs from delivery containers before piling and displaying the crabs for sale inside refrigerators). Details of the licensing requirements and modus operandi are being worked out. We will consult the trade on the proposed licensing regime and provide reasonable lead time for the trade to prepare for compliance with the licensing requirements before implementation. We do not have a concrete implementation timetable at this stage.

## **ADVICE SOUGHT**

17. Members are invited to note the content of the paper.

**Food and Health Bureau  
Food and Environmental Hygiene Department  
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## Monitoring Dioxins in Foods

Being the food safety regulatory authority, CFS monitors and studies potential food hazards and risks on substances which there are yet international or local food safety standards, having regard to food incidents, developments and trends in other places or Hong Kong.

2. Dioxins are a group of chemical compounds which are persistent environmental pollutants and highly toxic. They can cause reproductive and developmental problems, damage the immune system, interfere with hormones, and cause cancer. Dioxins arise either naturally or as by-products of industrial activities, e.g. metal smelting, molding or burning of chlorine-containing organic chemicals such as plastics. Dioxins are fat-soluble and not easily broken down which tend to accumulate in fatty tissues and along the food chain.

3. CFS has been providing risk communication messages on overseas incidents relating to dioxins detected in foods (for example, dioxins detected in foods in Belgium, Germany and Ireland). Also, to safeguard food safety, CFS has conducted local dietary studies, risk assessment and analysis on the impacts of dioxins and dioxin-like PCBs in foods on human health, and has uploaded those reports to CFS' website for reference by the public, the trade and overseas regulators<sup>4</sup>.

4. While the Codex Alimentarius Commission (Codex) has not recommended any standards on dioxins and dioxin-like PCBs in foods and our local food safety legislation has not stipulated the limit on the level of dioxins and dioxin-like PCBs in foods, the then Hygiene Division<sup>5</sup> of the Department of Health has set an action level of 1 picogram (pg) toxic equivalent per gram<sup>6</sup> of the

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<sup>4</sup> Belgium dioxin incident (1999):  
[http://www.dh.gov.hk/english/press/1999/30\\_07\\_99.html](http://www.dh.gov.hk/english/press/1999/30_07_99.html)

Incident of Irish pork detected with dioxins (2008):  
[http://www.cfs.gov.hk/english/press/2008\\_12\\_07\\_1\\_e.html](http://www.cfs.gov.hk/english/press/2008_12_07_1_e.html)

Incident of German eggs, poultry and pork detected with dioxins (2011):  
[http://www.cfs.gov.hk/english/press/2011\\_03\\_10\\_1\\_e.html](http://www.cfs.gov.hk/english/press/2011_03_10_1_e.html)

The First Hong Kong Total Diet Study Report No. 1 (2001):  
[http://www.cfs.gov.hk/english/programme/programme\\_firm/files/Report\\_on\\_the\\_first\\_HKTDS\\_dioxin.pdf](http://www.cfs.gov.hk/english/programme/programme_firm/files/Report_on_the_first_HKTDS_dioxin.pdf)

<sup>5</sup> CFS was established in 2006.

<sup>6</sup> 1 picogram (pg) toxic equivalent per gram means 1 part per trillion.

food sample for dioxins in 1999 and has started taking food samples for dioxin testing since then (testing for dioxins and dioxin-like PCBs in hairy crabs started in 2014 by CFS), having regard to the incidents on dioxins detected in foods in Europe.

5. Having taken into account the fact that other jurisdictions (EU and Taiwan) have set statutory maximum levels for dioxins and dioxin-like PCBs detected in fish and fishery products (including hairy crabs) at 6.5 picograms (pg) toxic equivalent per gram (for white meat in EU and brown and white meat in Taiwan), the results of local studies on dioxins in hairy crabs, and local dietary habits (i.e. people in Hong Kong generally consume both the brown meat and white meat of hairy crabs), CFS categorically set an action level of 6.5 picograms (pg) toxic equivalent per gram for hairy crabs in 2016.

6. For the period from 2013 to 2016, CFS had taken about 265 food samples (including 22 hairy crab samples) for testing of dioxins and dioxin-like PCBs. Apart from the three samples taken in 2016 which had exceeded CFS' action level of dioxins and dioxin-like PCBs (see paragraph 7 of the paper), the testing results of the remaining samples were satisfactory.