

Dear Sir,

1. These standards basically align with similar standards in most major countries. As HK imports all or almost all of the food covered by these standards, it should be easy to meet them.
2. What we however need is laboratories that can carry out requisite tests within acceptable time frame and at reasonable tests.
3. Standards for pesticide residues, heavy metals and aflatoxins already exists in Hong Kong for TEN or MORE years. There is apparently already DEMAND for such tests. But do suitable labs exists in Hong Kong? Is there turnaround time reasonable and cost commensurate to value of batch being tested? From my experience:
 - a. Many local "labs" do not have in-house test facilities. They simply send samples to China, Singapore or even Europe for analysis. And will promise a turnaround time of 15 working days after they receive sample!
 - b. Tests for Pesticide Residue + Heavy Metals + Mycotoxins + Sulphites + Illegal Dyes + Microbial parameter (all these requirements exist for TEN+ years - i.e. such demand exists!) for a single sample will cost well over HKD 10,000. CIF Hong Kong Import value of a typical batch could be costing average HKD 50,000. This means 20% of money spent (not for compliance) but to test for compliance!
 - c. None of the Local University offers Degree/Diploma courses in Food Testing / Technologist!

I think these and other existing food safety laws are basic and utmost essential. But what's more important is for government to actively promote Food Testing Labs in Hong Kong including:-

- To actively promote Food Technology / Testing EDUCATION in Hong Kong – labs on their own cannot do this simply by demand/supply!
- Just like TVP scheme for SMEs by TID for Technology, to give some suitable subsidy to local SMEs who want to establish their own in-house Food Testing Lab.
- To give some subsidy to local labs or guaranteed business from CFS to private labs until local demand builds.
- Or to offer testing at reasonable fees to local trade pegged to 3% of value of underlying batch? CFS can out-source testing to private labs at market rate.....which would slowly come down as the demand builds?

Sincerely,

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