

Dear Sir/ Madam,

Here would like to write about our comment on **Proposed amendments to Harmful Substances in Food Regulations (Cap. 132AF)**.

For the proposed amendments in relation to PHOs To regard “PHOs” as a prohibited substance in food by prohibiting the import of any edible fats and oils containing “PHOs” and the sale of any food (including edible fats and oils) containing “PHOs”, We , Unilever, are happy to see this. Remove TFAs originating from partially hydrogenated vegetable oils (PHVO) is one target of Unilever’s commitments announced in 2010. Being part of The International Food and Beverage Alliance (IFBA) members, we all have been working to remove trans fats from our products. In 2019, IFBA members committed to align their global standard with WHO’s recommendation for a maximum iTFA threshold in food products not exceeding 2 grams of iTFA per 100 grams of fat or oil by 2023.

For requiring that prepackaged foods (including edible fats and oils), if containing hydrogenated oils, be indicated accordingly (e.g. “hydrogenated oils” or the name of the oil qualified by the word hydrogenated”) in the list of ingredients. Prepackaged foods containing hydrogenated oils as the only single ingredient are also required to provide an ingredient list’ and comply with the labelling requirement for hydrogenated oils, we noted that the Amendment Regulations come into force 18 months after its publication in the Gazette. By referring to the industry practice, the longer grace period is suggested for trade to prepare and update the information of all products’ labels. Or we would like to explore the feasibility of setting a cut off expiry date. After grace period 18 months, the Amendment Regulation takes full effect the food marked with the expiry date after aligned cut off time. Hope these suggestions could help trade to get well prepared for the Amendment Regulation.

For tightening up the ML for “aflatoxins, total” in any food other than specified food from 15 µg/kg under the existing Regulations to 5 µg/kg, we noted that after considering potential food safety risks of aflatoxin to the local population (especially hepatitis B virus carriers), as well as the recommendation of the JECFA that the intake of aflatoxin should be reduced to a level as low as reasonably achievable, the proposal is to make reference to the practices of Malaysia and Singapore (aflatoxin in any food other than specified food is 5 µg/kg). The relevant limit of the United States is 20 µg/kg, and relevant standard of Korea is 15 µg/kg. Japan has set the relevant limit at 10 µg/kg for all food while Australia / New Zealand, Canada, the European Union and the Mainland have not set any relevant standard. However, when compared with other countries, the proposed max limit is stricter than most of the places, this limitation might cause serious trade barrier from other country while Hong Kong products heavily rely on importation from other countries like China. Hope this proposal could be further reviewed.

Thanks!

Best Regards,
Unilever Hong Kong Limited
Jessie Suen