

Dear Sir / Madam :

Re : 公眾諮詢：食物內有害物質規例》（第132AF章）的建議修訂

Here is my list of comments on PHO and hydrogenated oil:

1. Extend the grace period to 24 months after the Amendment Regulations publish in the Gazette.
2. Which 23 large scale international manufacturers were already prohibited PHO?
3. Need the labelling requirement details of "hydrogenated" oil / fat. What level % is required? Calculation method, testing method.
4. Is there any Natural Trans Fatty Acid reference data base of difference foods for reference.
5. Is there any import surveillance or import document requirement to show free of PHO of all foods? If yes, what are the surveillance and required import documents? How frequent you will check and test the PHO? Will you conduct testing of PHO at import of all foods by using EU method? What limit you used to take action?
6. To verify "all non-oil/fat and pre-packed" food is free of PHO and comply with regulation, do I use EU IP-TFA method and criteria, or Denmark method? PHO free limit is IP-TFA <2g/100?
7. To verify "all oil/fat and pre-packed" food is free of PHO and comply with regulation, do I use Iodine value method and limit is ≤4? Is it illegal if >4?
8. For the Total of Trans Fatty Acid, do I reference to Nutrition Labelling Technical Book, only lab test and sum of C14:1T(9-trans), C16:1T(9-trans), C18:1T(total), C18:2TT(9,12-trans), C18:2T(9-cis, 12-trans), C18:2T(9-trans, 12-cis), C20:1T(11-trans) and C22:1T(13-trans) for all foods? Why they are difference from EU method?
9. What test method and calculation method for Non pre-packed food to verify free of PHO for all foods?
10. If the IP-TPA over 2%, is it illegal? what action FEHD will take?
11. Why is the regulation approached on prohibited "fats and oils containing PHO", not prohibited "the addition of PHOs to food"?
12. Can you reply these questions and also post the answer in Q&A?
13. Can you arrange more Q&A technical forums to show the verification method and FEHD action?