1 Attachment

L128_23_ST_CFS comments on Cap132BD draft.docx

Dear Sir/Madam,

We would like to comment on proposed amendment of CAP 132BD. Please refer attached document for details.

Thank you for your attention.

Yours sincerely,

Stephen Tai
Assistant Technical Manager – Food, Life Sciences
Hong Kong

ALS Technichem (HK) Pty Ltd

right solutions.
right partner.

Centre for Food Safety
Food and Environmental Hygiene Department

Dear Sir/Madam,

RE: Comments about the Proposed Amendments to the Preservatives in Food Regulation (Cap. 132BD)

Since Government emphasizes that food industries should have responsibility for their product following the maximum permitted levels (MPLs) during production phase or seeking certified document from suppliers, the food industries will have demands on related preservatives testing to verify their product conforming regulation. Testing laboratories will be the key component to protect public health of society through providing effective and accurate testing on food preservatives.

We, ALS Technician (HK) Pty Limited, as one of the local HOKLAS accredited laboratory to provide food testing, are writing to feedback our comments about the Proposed Amendments to the Preservatives in Food Regulation (Cap. 132BD). Referring to the new list of permitted preservatives and antioxidants, there are several analytes to be challenges in point of view of chemical analysis in Food, details as below cases:

1. **Acetic acid and other preservatives with acetate as component**
   For the analysis of metal acetates, the acetate would be extracted as acetic acid. The amount of metal acetates would be calculated from the result of acetic acid. The new preservative list includes acetic acid, calcium acetate, potassium acetate, sodium acetate and sodium diacetate. Since calcium, potassium and sodium are common base metals found in variety of foods. It is difficult to resolve of those acetates. We would suggest using acetates similar to sorbates and benzoates as preservative group for maximum permitted levels (MPLs).

2. **Ascorbic acid and other preservatives with ascorbate as component**
   As same as case 1, ascorbic acids, calcium ascorbate and sodium ascorbate would be ascorbates as preservative group for MPLs.

3. **Citric acid and other preservatives with citrate as component**
   As same as case 1, citric acid, tricalcium citrate and tripotassium citrate would be citrates as preservative group for MPLs.

4. **Calcium lactate, potassium lactate and sodium lactate**
   As same as case 1, calcium lactate, potassium lactate and sodium lactate would be lactates as preservative group for MPLs.

5. **Propionic acid and other preservatives with propionate**
   As same as case 1, propionic acid, calcium propionate, potassium propionate and sodium propionate would be propionates as preservative group for MPLs.

6. **Citric and fatty acid esters of glycerol**
   This group of preservatives consists of mixed esters of citric acid and edible fatty acids with glycerol. We would like to clarify the definition of those compounds and the method to analyze their contents.

7. **Phosphates**
   Phosphates include different alternative forms. The amount of specific form could be calculated from total phosphate. However, phosphates occur naturally in many foods such as dairy products, nuts, meats and seafoods. Would you please advise guidance on determination of artificial phosphates from natural ones?

8. **GMP additives governed by MPLs**
   According to Annex VI, a list of Food Categories is still under MPLs for GMP additives. However, those GMP additives are shown GMP in MPLs. Would you please advise how to apply the MPLs on those GMP additives?

9. **Methods of analysis**
   As there are several new added food preservatives and antioxidants, the analytical methods may be also new to testing laboratories. Would you please advise the recommended methods, techniques and limit of detection for us? It may involve extra investment on purchasing new instrument / equipment for new analysis.

We are looking for your feedback or more information to share. For any queries, please feel free to contact us. Thank you!

Yours sincerely,

Stephen Tai
Assistant Technical Manager – Food, Life Sciences
Hong Kong