

Dear Sir/ Madam,

Re: Views from Dairy Farm Company Limited for Public Consultation on Proposed Amendments to the Preservatives in Food Regulation (Cap. 132BD)

Dairy Farm Company Limited (DFCL) are in support of CFS's direction to take reference to international practices when formulating the Proposed Amendments. In response to the Public Consultation on Proposed Amendments to the Preservatives in Food Regulation (Cap. 132BD), DFCL would like to put forward our view in this submission for CFS's consideration.

To start with, during the question and answer session for the 1st CFS Technical Meeting with Trade, we were informed for the first time that all the additives (that does not serve the function as preservative/antioxidant) that will be included in the new list of preservative/antioxidant must comply to the maximum permitted level that is stipulated in the regulation for preservative/antioxidant. This was never informed to the industry earlier. It would be a big impact for the industry, as currently we do not enquire the amount of food additives used, except when it is a preservative/antioxidant. With the new information announced, we will need to now contact all of our suppliers and most probably their suppliers around the World to get this information. We will also need to review if the set standard is reference to Codex or regulations in any other countries. Please note that, this requirement was never listed in consultation documents or earlier forum. *We humbly request to extend the consultation period to be extended by another 2 months to critically evaluate the impact to the industry.*

Secondly, for the Proposed amendments on the change of definition for preservatives and antioxidant, the packaging needs to be changed if the product contains the food additive that currently not fall in the definition but classified as "preservatives/antioxidants" in the amendments. This is very time consuming process which involves:

- Designing new artwork
- Making packaging printing plates
- Ordering packing from packaging supplier. There is always a minimum order quantity meaning that excess packaging may have to be ordered far in excess of immediate needs with the balance held in stock for later use.
- Run down inventory of old packaging stock, sometimes more than 12 months stock for certain items
- Manufacture the food in the new packaging and send to Hong Kong
- Sell all food produced in old packaging taking into account expiry date

Thirdly, considering the products already produced may have a long shelf life, such as 18 months for most frozen food and 2-3 years for canned food, the business need time to clear all the stock to avoid producing food waste and packaging waste that have harsh consequence to the environment and costly to the business.

For the practical reasons listed above and to avoid wastage, DFCL request CFS to extend the consultation period for extra 2 months and at least a 24 months grace period for the industry and all relevant stakeholders to prepared for the updated food safety standards.

Best regards
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