TC 立法會 CB(2) 790/05-06(05)號文件 LC Paper No. CB(2) 790/05-06(05)



DEPARTMENT OF ZOOLOGY THE UNIVERSITY OF HONG KONG

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December 28, 2005

The Honorable Mr. Li Wah-Ming
Chairman
Legco Panel on Food Safety and Environmental Hygiene

Dear Mr. Li:

Thank you for your letter of Dec 19, 2005 inviting me to comment on the reorganization Plan for the Food Safety regulatory Framework,

I do think it is timely to look at the food safety issue relating to the regulatory and Inspection framework in view of all the food poisoning events happened in this past year.

I have read through the papers listed in the Legco's website.

In general principle, setting up Food Safety, Inspection and Quarantine Department is a good idea. Specifically the stepping up the regulation and inspection of local livestock and poultry farms, vegetable farms and mariculture farms is most welcome. However, food safety is a complex issue and requires expertise in many areas including medical and veterinary know ledges to ensure the highest standard. Though "0" risk is a target but seldom achieved even in the most developed countries. Hence, developed countries developed tracking system from farm gate to family dinner table to ensure the traceability once there was an event. Since we have a small agriculture sector and most of our foods are imported, we need a system that understands every aspect of our food sources in order to set up the proper regulation and inspection scheme. In view of the letter dated on Nov 28, 2005 and submitted by the Government Veterinary Officers who should have detailed knowledge regarding our local and regional agricultural conditions, the proposed plan put forward may not have gone through the necessary consultation by all stakeholders.

Also, the proposed plan may be underestimating the complexity of the issue by simply realigning/recombining various sections within the two departments involved without a full management auditing of the two departments involved.

I would like to summarize that the proposed idea is a step towards the right direction. However, I would like to see a cost benefit analysis, management auditing of the two departments related to food safety in particular and full consultations with all stakeholders before a more effective plan for such reorganization can be formulated. Specifically, this new department will require additional staff and resources.

Sincerely,

Dr. Frederick C. Leung

Associate Professor and

Dean of Science

University of Hong Kong

Hong Kong