



Hong Kong General Chamber of Commerce
香港總商會 1861

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Our Ref: CC007

Ms Vivian Lau, JP
Director of Food and Environmental Hygiene
Food and Environmental Hygiene Department
45/F, Queensway Government Offices
66 Queensway, Hong Kong

Dear Ms Lau

Legislative Proposals on the Regulation of Edible Fats and Oils and Recycling of “Waste Cooking Oils”

It has been the Hong Kong General Chamber of Commerce’s long-standing position of supporting the protection and promotion of public health as it is an important part of sustainable development which the Chamber champions. Hence we welcome the legislative initiative of setting up quality standards for edible oils imported into, or manufactured in, Hong Kong along with the recycling of waste cooking oils.

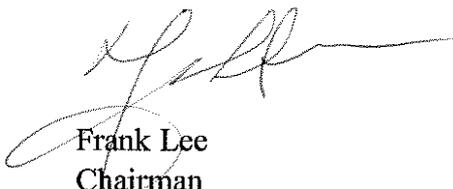
In consideration of the Government's proposals, we believe that an effective regime will not be achieved by over-regulation, but rather, there should be a combination of sensible regulation, business-friendly compliance and effective public education. We have some concerns that the present proposals may in fact have the former implication.

We would like to stress that any new regulation should not add unnecessary burden to the operating cost of business nor become a trade barrier limiting consumer choices. The Chamber has been urging the Government to carry out a rigorous comprehensive regulatory impact assessment on both intended and unintended consequences for both new and existing regulations, and intervention should only be justified if the benefits clearly exceed the costs. This new legislative proposal, if not well thought through, would bring negative impacts not only to the trade, but also other industries such as the retail sector. In view of the small market nature of Hong Kong and its unique characteristic of having a wide variety of foods available, the introduction of the proposed legislation might discourage importers from continuing to bring such variety of products into Hong Kong owing to the anticipated higher cost, cumbersome procedures and difficulty in obtaining the necessary certification. As a result, the choices for consumers would be compromised.

The Chamber would also like to express our support for the submission prepared by the Hong Kong Retail Management Association on the subject and would therefore agree that there should be further moderation in the design of the legislation, and greater flexibility in its implementation.

While we understand that the consultation period has passed, your favourable consideration of our views is much appreciated.

With best regards

A handwritten signature in black ink, appearing to read 'Frank Lee', with a long horizontal flourish extending to the right.

Frank Lee
Chairman
Retail & Tourism Committee
Hong Kong General Chamber of Commerce