



**Comments and suggestion on the Legislative Proposal on Regulation of Edible fats and Oils**

to: edible\_oils@fehd.gov.hk  
cc: wco\_consultation@epd.gov.org

5/8/2015 10:43

From:

To: <edible\_oils@fehd.gov.hk>  
Cc: <wco\_consultation@epd.gov.org>  
**Please respond to**

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History: This message has been forwarded.

Dear Sirs,

Below please find my comments on the proposed legislative changes and current regulations;

1) Chapter 2 – Situation in HK – Legislation relating to safety of Edible fats & Oils

-Comments/suggestion:

I suggest that premises which carry out (2.4) bottling / and or canning of edible oils shall be required to undergo checks and controls on a regular at least every three months in regards to the purity of ingredients used, and tractability of the sources and documentation compliance. In addition they should apply for a food handling license making them more accountable. And to further strengthen current practice and legislation for the prevention of adulteration of Oils.

The main concern is that during the bottling/canning of Oils/Fats the operator may use a blend / mix or add other by products to achieve lower costs by dilution the produce i .eg with 2 different quality levels. As an example. Where Extra Virgin Olive Oil is being bottled bottler may use different grades of Olive Oils or other i.eg Canola or Coconut Oils to a certain percentage to lower costs but still bottle it under a "Extra Virgin Olive Oil" the average consumer has now way of telling the difference while he paying premium but receiving a low grade produce.

2) Comments / suggestions on the Situation of the Recycling of Waste Cooking Oil

-quite a few cases emerged where waste oil was recycled and mixed back into the consumer chain after undergoing a "cosmetic" treatment and resold as edible oil again

Our suggestion is to ban per se the reuse of recycled or collected waste Oils / Fats from being reintroduced to the consumer and to introduce a stronger monitoring system as to the final disposal of such Oils with a 100 % traceability and end user certification system to ensure waste oils collected are either destroyed or disposed or in any other way treated so as to prevent their reuse or re-entry into the consumer chain.

Further legislation should be introduced to make it an offense for food operators where waste oils are being generated during their operation to discharge them into the environment and waste collection schemes should become mandatory in food premises licensing requirements. For all food operators and especially the street food operators and open kitchens of which there are thousands in Hong Kong and who can be seen on a daily basis discharging their Oils in to the gutters , here the EPD and FEHD are not doing enough at all!

3) On Labeling of Edible Oils – specifically EXTRA VIRGIN OIL

We strongly recommend that the wording ‘Extra Virgin Olive Oil’ on consumer label shall only be allowed if the contents do not contained any other Oil at all .

I, eg. we still find labels and produce in the market where the Label says ‘ Extra Virgin’ but at closer inspection one can find remarks on the label that other Oils have been added to it I, eg Sunflower / Canola or a blend of Extra Virgin and Olive Oil / Pomace Oil. Effectively giving the consumer the feeling he buys a quality product but in fact he receives a cheap blend of something simply Exploiting the Image of Extra Virgin Olive Oil .

Hong should adopt a 100 % strict protection level on the Extra Virgin Olive Oil standard and not allow labels who for the unexperienced consumer seem to be a quality Extra Virgin Oil but in fact contain only a small percentage and by Codex Alimentarius definition Extra Virgin Olive can not and shall not consist of a blend of different Oil grades . Here Hong Kong has a shortfall in the consumer protection . And the current labeling practice should be strengthened immediately to ban Oil Labels using the wording EXTRA VIRGIN whilst containing blends / or adding other Oils or other Olive Oil grades .

With best regards

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**SMS FOOD INDUSTRIES CORPORATION**