

**For Discussion
on 9 January 2018**

LegCo Panel on Food Safety and Environmental Hygiene

**Result of the Public Consultation on the
Proposed Amendments to the Food Adulteration (Metallic Contamination)
Regulations**

PURPOSE

This paper informs Members of the views collected during the public consultation exercise on the proposed amendments to the Food Adulteration (Metallic Contamination) Regulations (Cap. 132V) (the Regulations), our responses to those views and the proposed way forward.

BACKGROUND

2. We conducted a comprehensive review on the Regulations and came up with various proposed amendments to the Regulations, with a view to better protecting public health, facilitating effective regulation, and promoting harmonisation between local and international standards. We conducted a public consultation exercise on the proposed amendments to the Regulations from 6 June to 5 September 2017. We attended the Legislative Council Panel on Food Safety and Environmental Hygiene on 13 June and 3 July 2017 respectively, to listen to Members' views and the views of the deputations representing the trade. Also, we attended the meeting of the Wholesale and Retail Task Force under the Business Facilitation Advisory Committee, and held various public forums and trade consultation forum to listen to the views of the trade and other stakeholders.

3. Details of our proposed amendments are set out in LC Paper No. CB(2)1567/16-17(01). The public consultation document was attached to that paper.

VIEWS RECEIVED AND OUR RESPONSES

4. During the public consultation exercise, we received 21 submissions. Nine submissions came from the food trade, trade associations and private testing laboratory, four from overseas authorities, two from political parties, one from a District Council Member, one from a professional body, one from the Consumer Council (CC), and three from the general public. A list of the submissions is at **Annex A**. The submissions are uploaded onto the Food and Health Bureau's website.

5. Generally speaking, the respondents welcomed and supported our proposed directions and principles for amending the Regulations, namely:

- (a) to replace the existing food categories of “all food in solid / liquid form” with specific maximum levels (MLs) targeting individual food / food groups, with a view to aligning with the principle of the Codex Alimentarius Commission (Codex)¹ and modern international regulatory trends of specifying metallic contamination standards for individual food / food groups of significant dietary exposure;
- (b) to adopt Codex MLs unless otherwise justified;
- (c) to establish MLs for food / food groups which are of significance to the population in Hong Kong and which there is no relevant Codex MLs;
- (d) to update the food descriptions and nomenclatures in the Regulations, with reference to the available Codex's food descriptions and nomenclatures or those of other jurisdictions as appropriate; and
- (e) to incorporate interpretation of MLs into the Regulations, given that there is currently no interpretation in the Regulations on how the MPCs can be applied to food in a dried, dehydrated or concentrated form; as well as multi-ingredient products.

6. Also, respondents generally supported or did not have differing views on most of the 145 proposed MLs of specific metallic contaminants in specific food/food groups. While there were views that the standards should be as

¹ Codex, established by the Food and Agriculture Organization of the United Nations and the World Health Organization in 1960s, is the single most important international source of reference for consumers, food producers, processors, national food control agencies and the international trade in developing food associated standards.

stringent as possible, there were also views that it was necessary to strike a balance between food safety and food supply. There were views on a few proposed MLs though.

7. We set out those views received and our responses in **Annex B**.

Grace period

8. In the public consultation document, we mentioned that we would consider giving a reasonable grace period for the Amendment Regulations to come into effect, so that the trade and the private testing and laboratory sector will have reasonable time to get prepared for the updated standards. We invited views on the duration of the grace period.

9. The trade and the overseas authorities, in general, expressed the need for an ample period of time for the trade to get prepared for the Amendment Regulations. CC suggested a grace period of 12-18 months. An overseas authority suggested a minimum transition period of 12 months.

10. We agree that we should give sufficient time for traders to adapt to the updated MLs (including identifying alternative sources) and the local testing and laboratory sector to build up testing capacity based on the new MLs. Yet, we are mindful that the public would expect to see the proposed amendments, in particular the proposed MLs, to be in place as soon as practicable. We propose to provide a grace period of 12 months after the Amendment Regulations were gazetted for fresh foods (i.e. fresh fruits and vegetables, fresh meat and edible offal of animals and poultry, aquatic animals and eggs), given their shorter durability and shelf life than other food items. Also, we propose a grace period of 24 months after the Amendment Regulations were gazetted for other food items given that non-fresh foods may normally have a shelf/storage life up to 24 months.

WAY FORWARD

11. We have carefully considered the views received during the public consultation exercise. For example, to address the concern about the possible impact of the proposed MLs for metallic contaminants in aquatic animals, CFS has compared the proposed MLs for various types of aquatic animals with the results of the routine food surveillance programme in the past and the additional baseline studies conducted in the past few months, with a view to assessing the possible impact of the supply of relevant food or food groups. CFS assessment is that the proposed MLs are not likely to affect the supply of aquatic animal in Hong Kong in general. Also, we have taken note of the views that Codex is

reviewing its approach on setting standards on metallic contaminants in fish and will keep in view the development and the experiences of other economies in following Codex' s new standards when they are established.

12. We will take forward our proposed amendments as set out in the public consultation document, and our proposed grace period as set out in paragraph 10 above.

13. We plan to put forward the Amendment Regulations for tabling in the Legislative Council in 2018.

ADVICE SOUGHT

14. Members are welcome to comment on this paper.

**Food and Health Bureau
Food and Environmental Hygiene Department
Centre for Food Safety
January 2018**

**List of written submissions
received during the public consultation exercise**

Serial No.	Stakeholder
001	Anonymous
002	Mr. LAI Ming-cha, Member of Sai Kung District Council
003	The Democratic Party
004	The Rice Merchants' Association of Hong Kong Limited
005	The Hong Kong Food Council Limited
006	Hong Kong Chamber of Seafood Merchants Limited
007	Hong Kong Rice Importers and Exporters Association and Hong Kong Rice Suppliers' Association
008	CMA Testing and Certification Laboratories
009	Anonymous
010	Canadian Food Inspection Agency
011	Consumer Council
012	Deep Bay Oyster Cultivation Association
013	Coca-Cola China Ltd.
014	Ministry for Primary Industries, New Zealand
015	The Civic Party
016	Anonymous
017	Australian Department of Agriculture and Water Resources
018	Hong Kong College of Community Medicine
019	Hong Kong Fishermen Consortium
020	Nestlé Hong Kong Limited
021	Agricultural and Processed Food Products Export Development Authority, Ministry of Commerce & Industry, Government of India

Views received during the public consultation exercise and our responses

(I) To replace the existing food categories of “all food in solid / liquid form” with specific MLs targeting individual food / food groups

The Consumer Council (CC) opined that our proposed approach might not be able to protect public health effectively and suggested that there should be a food group called “other foods” of which the maximum levels (MLs) will follow the existing maximum permitted concentrations (MPCs) for “all food in solid / liquid form”. The CC quoted buckwheat, quinoa and mantle of scallops, etc. as examples of “other foods”.

2. We wish to point out that the principle of replacing the existing food categories of “all food in solid / liquid form” with specific MLs targeting individual food / food groups is in line with Codex principle and modern international regulatory trends of specifying metallic contamination standards for individual food / food groups of significant dietary exposure². Setting specific MLs targeting individual food / food groups will be conducive to a more focused, tailor-made and proportionate regulation over metallic contamination in food, calibrated in accordance with the known risks associated with the food item concerned.

3. According to the Codex principles for establishing MLs in food, MLs shall only be set for food in which the contaminant may be found in amounts that are significant for the total exposure of the consumer, i.e. the general local population. In other words, it is not necessary to set MLs for each and every type of foods that contain a contaminant.

4. Our proposed amendments will increase the total number of MLs under the Food Adulteration (Metallic Contamination) Regulations (Cap. 132V) (the Regulations) from the existing 19 to 145, whereas Section 54 of the Public Health and Municipal Services Ordinance (Cap. 132) (which stipulates that all food for sale must be fit for human consumption) and Regulation 3 of the Regulations (which prohibits the import, consignment, delivery, manufacture or sale, for

² Malaysia, Thailand and Singapore are the exceptions, but their regulatory requirements, similar to the Regulations, were established in 1980s or before. Australia and New Zealand once adopted a general ML for “other foods” for various metallic contaminants, in addition to MLs for specific food / food groups. However, the general ML was repealed during their regulatory review in 1999 due to the low contribution to total exposure from a contaminant by these “other foods” and the practical difficulties in setting a meaningful ML for these “other foods”.

human consumption, of any food containing any metal in such amount as to be dangerous or prejudicial to health) will still apply. For food / food groups without specific MLs under the Regulations, the Centre for Food Safety (CFS) will continue to make use of risk assessment as the safety net, striking a balance between safeguarding public health and avoiding undue regulation. Risk assessment is science based and in line with international practice. We consider that our proposed approach is adequate to protect public health and food safety.

5. The proposed MLs for antimony, arsenic, cadmium, chromium and lead in “cereals” will also be applicable to buckwheat and quinoa.

6. Our proposed ML for cadmium in bivalve molluscs will be applicable to the whole commodity of scallops after removal of shell and viscera. We will explain the reason why the above proposed ML when applies to scallops does not cover shell and viscera in paragraph 27 below.

(II) To adopt Codex MLs unless otherwise justified

7. A fishermen association considered that we should further review the proposed MLs, taking into account the data from Asia instead of solely relying on the Codex standards.

8. We consider that there are merits in adopting MLs and guideline levels (GLs)³ for metallic contaminants in various food / food groups recommended by Codex and incorporate them into the Regulations unless there are strong scientific justifications to adopt a different standard. Keeping the Regulations abreast of the Codex standards will safeguard food safety, bring our regulatory practices in alignment with international standards, and prevent possible trade barriers and disputes.

(III) To establish MLs for food / food groups which are of significance to the population in Hong Kong and which there is no relevant Codex MLs

9. A local food trader expressed reservation about establishing MLs for food / food groups in addition to Codex MLs and raised the concern that such principle might constitute trade barrier.

10. We wish to point out that it is a common practice that economies world-

³ According to General Standard for Contaminants and Toxins in Food and feed (CODEX STAN 193 – 1995) (GSCTFF), a Codex GL is the maximum level of a substance in a food commodity which is recommended by Codex to be acceptable for commodities moving in international trade. When the GL is exceeded, governments are advised to decide whether and under what circumstances the food should be distributed within their territory or jurisdiction.

wide, such as Australia, Canada, the European Union (EU), Japan, Korea, the Mainland, New Zealand, Singapore, establish MLs for food / food groups which are of significance to the local population and which there is no relevant Codex MLs. We notified the World Trade Organisation of our proposed amendments in tandem with the public consultation exercise.

11. To identify specific food / food groups which are of significance to the local population, we have taken into account factors such as the local food consumption pattern / dietary practice, results of risk assessment studies and total diet study conducted locally in the past, recent food incidents in Hong Kong and other economies, and relevant standards of other economies⁴. In proposing the MLs for these specific food / food groups, we have taken into consideration the “as low as reasonably achievable” (ALARA) principle⁵ of Codex.

(IV) Proposed MLs for specific food/food groups

(a) Cadmium in polished rice

12. Two political parties, a District Council Member and the CC considered that we should keep the existing MPC of 0.1 mg/kg in polished rice intact as they were concerned that relaxing it to 0.2 mg/kg would expose the general population to a higher health risk. The rice trade associations supported our proposed ML of 0.2 mg/kg for cadmium in polished rice.

13. Under the proposed amendments, cadmium is only one of the six metallic contaminants with proposed MLs applicable to polished rice. The other five metallic contaminants are namely antimony, arsenic, chromium, lead and mercury. Our current proposals are to tighten the standards for arsenic, lead and mercury, relax the standard for cadmium while maintaining the prevailing standards for antimony and chromium as follows:-

	Existing MPCs (ppm)	Proposed ML (mg/kg)	Remarks
More stringent than existing standard			
1. Arsenic in polished rice	1.4 (As ₂ O ₃) 1.1	0.2 (inorganic arsenic)	Same as Codex ML

⁴ Such as Australia, Canada, the EU, Japan, Korea, the Mainland, New Zealand, Singapore, the United States of America (USA), etc.

⁵ According to GSCTFF, contaminant levels in food shall be ALARA through best practices such as Good Agricultural Practice and Good Manufacturing Practice following an appropriate risk assessment.

	Existing MPCs (ppm)	Proposed ML (mg/kg)	Remarks
	(inorganic arsenic)		
2. Lead in cereal grains	6	0.2	Same as Codex ML
3. Mercury in rice, husked rice, polished rice, maize, maize flour, wheat, wheat flour	0.5 (total mercury)	0.02 (total mercury)	
Less stringent than existing standard			
4. Cadmium in polished rice	0.1	0.2	More stringent than Codex ML (0.4 mg/kg)
Same as existing standard			
5. Antimony in cereals	1	1	
6. Chromium in cereals	1	1	

14. The existing MPCs of 0.1 mg/kg for cadmium in the food group “cereals and vegetables” (including polished rice) as laid down in the Regulations was established by the Government in 1983. When establishing / reviewing standards on metallic contamination under the Regulations at that time, the Government had made reference to the Codex standards and other jurisdictions (e.g. Australia, Japan, Singapore, the United Kingdom and the United States of America (USA)) as well as the available data on the metallic concentrations in various foodstuffs. The current standards for cadmium in polished rice adopted by Codex and other jurisdictions are as follows:

ML for cadmium in polished rice (mg/kg)	International organisation / country / economy
0.4	Codex, Japan, Taiwan, Vietnam
0.2	EU, Korea, the Mainland, Singapore
0.1	Australia, New Zealand
No relevant standard	Canada, USA, Thailand

15. Our proposed ML for cadmium in polished rice is more stringent than the relevant Codex standard which was adopted in 2006. According to the information we have gathered, among the countries / economies that have established MLs for cadmium in polished rice, only Australia and New Zealand (apart from Hong Kong) have maintained ML of 0.1 mg/kg for cadmium in polished rice and their standards were established before 1999. Economies of which polished rice is their staple food have adopted the Codex standard of 0.4 (Japan and Vietnam), the standard of 0.2 mg/kg (the Mainland, Korea and Singapore) or do not have ML (Thailand). Our current proposed ML for cadmium in polished rice compares favourably with those economies.

16. In formulating the proposed MLs above, we have taken into account various relevant factors, including the latest Codex standards, relevant standards of other jurisdictions, the local food consumption pattern and dietary practice, and results of risk assessments conducted in the past, etc. According to the report of the “First Hong Kong Total Diet Study: Metallic Contaminants”, rice contributed to only 6% of the total exposure of cadmium for average consumers of the population, whereas the dietary exposures to cadmium of average and high consumers of the population accounted for 33% and 75% of the relevant health-based guidance value (HBGV) respectively. The health of the general population is unlikely to be affected by the intake of cadmium through rice. Results of our risk assessment also indicated that a proposed ML at 0.2 mg/kg for cadmium in polished rice, based on the local rice consumption, is adequate in protecting public health in Hong Kong. As such, we do not have strong scientific justification to keep the existing MPC for cadmium in polished rice.

(b) Aquatic animals

17. Among the proposed MLs for metallic contaminants in aquatic animals, those for antimony, chromium and mercury⁶ are more or less the same as the existing MPCs, those for arsenic and lead will be tightened whereas the coverage for those for cadmium will be extended.

(i) Mercury in fish

18. The existing MPCs for mercury in “all food in solid form” (including fish) under the Regulations is 0.5 mg/kg of total mercury. Our proposed ML for mercury in fish is 0.5 mg/kg as expressed as methylmercury. Codex has established GLs of 0.5 mg/kg of methylmercury in fish (other than predatory fish)

⁶ The existing MPCs for mercury in fish is expressed as total mercury; whereas the proposed ML for mercury in fish is expressed as methylmercury, noting that methylmercury can generally contribute more than 90% of the total mercury content in most fish.

and 1 mg/kg of methylmercury in predatory fish respectively.

19. We have received diversified views on the proposed ML for mercury in fish. Two political parties suggested that ML for fish should be proposed for total mercury in addition to methylmercury. A seafood trade association considered that the proposed ML for methylmercury in fish was too stringent as compared with the standards of other economies and suggested a less stringent ML. A few overseas authorities (Australia and New Zealand) pointed out that Codex was reviewing its standards for methylmercury in fish and might move towards setting species-specific MLs. Separately, they suggested us to adopt the new Codex recommendations when available, adopt the current Codex GL for methylmercury of 1.0 mg/kg for predatory fish in the meantime, or address the health risk concern arising from methylmercury by issuing dietary advice.

20. Methylmercury generally contributes more than 90% of the total mercury content in most fish and is the most concerned form of mercury in fish in terms of its occurrence and health effects⁷. During the review of the standards for mercury in fish, Codex in 2017 agreed to continue establishing MLs based on methylmercury. Our proposed ML in terms of methylmercury, instead of total mercury, is therefore in line with Codex and international practices.

21. Taking into account that about 11% of women of childbearing age had dietary exposure to methylmercury exceeded the relevant HBGV in the local setting⁸ and the potential health risks to foetus upon methylmercury exposure during pregnancy, we consider that a proposed ML of 0.5 mg/kg for methylmercury in fish is appropriate.

22. Even though the above proposed ML when applied to predatory fish is more stringent than the Codex GL of 1 mg/kg for methylmercury in predatory fish, we expect that the proposed ML will have minimal impact on the supply of fish to Hong Kong, and at the same time will not compromise local food safety. CFS will continue to provide dietary advice to the susceptible groups (e.g. women of child-bearing age, pregnant women and children) and the general public in terms of mercury and the benefits of fish consumption via various channels.

⁷ Elemental mercury (from dental fillings for example) does not generally pose a health risk. Inorganic mercury can cause kidney failure and gastrointestinal damage. Methylmercury, on the other hand, is more harmful to human health than the elemental and inorganic forms of mercury. For foetuses, infants and children, the primary health effect of methylmercury is impaired neurological development. Methylmercury exposure in the womb, which can result from a pregnant woman's consumption of fish and shellfish that contain methylmercury, can adversely affect a baby's growing brain and nervous system. Studies found that foetal exposure to methylmercury in the womb would affect the cognitive thinking, memory, attention, language, and fine motor and visual spatial skills of children. Methylmercury is therefore the form of mercury of the highest concern in fish in terms of occurrence and health effects.

⁸ Source: Report of the "First Hong Kong Total Diet Study: Metallic Contaminants".

23. We note that Codex is reviewing its standards for methylmercury in fish and may move towards setting species-specific ML. This will represent a major global change which will take time to evolve and be adopted. CFS will keep in view the Codex development and the experience of other economies in following Codex's new standards when they are established. Given that Codex has yet to turn that idea into action and work out the species-specific MLs for methylmercury in fishes, we consider it premature to consider and go for species-specific MLs for methylmercury in fishes in this amendment exercise.

(ii) Proposed MLs in various types of metallic contaminants in aquatic animals (including fish)

24. A fishermen organization and an oyster cultivation association were concerned about the proposed MLs for arsenic and lead in aquatic animals which were much more stringent than the existing MPCs. A local private testing laboratory suggested a more stringent ML for cadmium in seafood, given the problem of global marine pollution and that Hong Kong people consumed huge amount of seafood. A seafood trade association considered that the proposed ML for cadmium in bivalve molluscs might lead to a high non-compliance rate. On the other hand, an overseas authority (Australia) suggested us to follow Codex's practice in excluding oysters and scallops from the ML for cadmium in marine bivalve molluscs. The aforementioned overseas authority also suggested us to consider adopting more lenient MLs for inorganic arsenic in bivalve molluscs (specifically *Amusium* scallops), and cadmium in swordfish, *Penaceus* and *Thenus* species, lest the supply of the products concerned would be restricted, and opined that they might represent a minor component of the Hong Kong diet.

25. In light of the views received during the public consultation exercise over the proposed standards for aquatic animals, we have compared the proposed MLs for various types of aquatic animals with the results of CFS' routine food surveillance programme in the past and the additional baseline studies conducted in the past few months, with a view to assessing the possible impact of the supply of relevant food or food groups. The findings are:

- (a) 96% of the samples of bivalve molluscs (including clams, cockles, mussels, oysters and scallops) complied with the proposed ML of 0.5 mg/kg for arsenic (inorganic arsenic). However, *Amusium* scallop samples have a lower compliance rate. We will alert the trade of this finding so that they will be aware of and assess the risk of importing *Amusium* scallops in future. Also, we will issue advice to the general public on the potential risk of high metallic contamination in *Amusium* scallops;

- (b) over 97% of the samples of fishes collected under CFS' routine food surveillance programme were found complying with the proposed ML of 0.1 mg/kg for arsenic (inorganic arsenic);
- (c) according to the results of CFS' routine food surveillance programme and additional baseline studies, the levels of cadmium in bivalve molluscs (including scallops and oysters) could generally comply with the proposed ML of 2 mg/kg, with compliance rate at 98% or more;
- (d) over 99% of samples of aquatic animals collected under CFS' routine food surveillance programme from 2012-2016 complied with the proposed MLs for lead;
- (e) while most of the crustaceans complied with the proposed ML of 2 mg/kg for cadmium, some species like bay lobsters (i.e. *Thenus* species), brown crabs, zebra mantis shrimps had a far lower compliance rate. We will alert the trade of these findings so that they will be aware of and assess the risk of importing those types of crustaceans in future. Also, we will issue advice to the general public on the potential risk of high metallic contamination in those types of crustaceans; and
- (f) most of the fish species complied with the proposed standard of 0.1mg/kg for cadmium. However, swordfish samples have a lower compliance rate. We will alert the trade of this finding so that they will be aware of and assess the risk of importing swordfish in future. Also, we will issue advice to the general public on the potential risk of high metallic contamination in swordfish.

26. In general, according to the results of the routine food surveillance programme in the past and additional baseline studies of CFS, less than 5% of the test results for levels of metallic contamination for the food groups were found exceeding the proposed MLs. This proportion is in line with the Codex approach in setting food safety standards. Meanwhile, the Agriculture, Fisheries and Conservation Department has also conducted tests (including levels of metallic contamination) on local farmed fish, indicating general compliance with the proposed MLs. Overall speaking, the proposed MLs are not likely to affect the supply of aquatic animal in Hong Kong.

27. Our proposed ML for cadmium in bivalve mollusc is applicable to scallops, whereas the Codex's ML for cadmium in marine bivalve molluscs does not apply to scallops at all. In proposing that the ML for cadmium in bivalve mollusc will apply to the whole commodity of scallops after removal of shell and

viscera, we have taken into account the fact that adductor muscle of scallops (i.e. scallops without viscera, either in fresh or dried form) are common in Hong Kong and scallops (specially their viscera) may accumulate various types of hazards (such as heavy metals, shellfish toxins and microbiological contaminants). The shell of a scallop is not edible. While some people in Hong Kong may eat the viscera occasionally depending on the cooking methods, most of the people in Hong Kong for most of the time will not eat the viscera when they eat scallops. CFS may continue to advise the public of the safety tips on eating scallops, including advising them not to eat the viscera of scallops.

(c) MLs for lead in beverages

28. A respondent from the food trade suggested aligning the proposed MLs for lead in beverages with the Mainland standard, i.e. changing from our proposed 0.2 mg/L to 0.3 mg/L (existing MPC for lead in all food in liquid form is 1 mg/L).

29. Our proposed MLs of 0.2 mg/L for lead in beverages follows the Codex standard. According to the results of the routine food surveillance programme of CFS, the levels of metallic contamination in carbonated beverages, tea beverages and coffee beverages available in local market can generally comply with the proposed MLs of 0.2 mg/L and hence the Codex's ALARA principle is being followed. We suggest maintaining our proposed ML as it is.

(d) ML for tin in canned beverage

30. A respondent from the food trade suggested that the proposed ML of 150 mg/kg for tin in canned beverages be applicable to tin-plate containers only.

31. Canned food is generally referred to food products which are processed in an appropriate manner, before or after being hermetically sealed in a container. Tin contamination is mainly limited to foods or beverages packed in a tin-plate containers. Foods packed in cans other than tin-plate containers are unlikely to have problems in complying with the proposed MLs for tin. That said, given that the MLs for tin are not restricted only to foods/beverages packaged in tin-plate containers according to Codex standard, we suggest maintaining our proposed ML as it is.

(V) Other issues

32. A political party suggested requiring the declaration of the levels of metallic contamination on the food labels. Codex has not recommended any standard or guideline in this aspect. Also, other economies including Australia, Canada, EU, Japan, the Mainland, Singapore and the USA do not have such

statutory requirements. That said, we will keep in view the international development on the regulation of metallic contaminations in food and review the local situations as and when necessary.

33. A political party suggested that the Government as a whole should consider regulating the metallic contaminants of Chinese herbal medicines. The Regulations do not cover Chinese herbal medicine or proprietary Chinese medicine as defined under the Chinese Medicine Ordinance (CMO) (Cap. 549). That said, the Chinese Medicine Council of Hong Kong (CMCHK) has set the maximum permitted intake limits of four heavy metals (arsenic, cadmium, lead and mercury) in Chinese herbal medicines and proprietary Chinese medicines. To monitor the quality and safety of Chinese medicines per the requirements as regulated under the CMO, the Department of Health has put in place a market surveillance system under which samples of Chinese herbal medicine and proprietary Chinese medicine would be collected from the market for testing of the aforementioned four heavy metal contents on a regular basis. Moreover, CMCHK will from time to time review the limits and scope of heavy metals in Chinese medicines as well as the sampling strategy of the market surveillance system to safeguard public health.

- The end -