

**Business Facilitation Advisory Committee
Wholesale and Retail Task Force**

Import Control and Surveillance of Hairy Crabs

Purpose

This paper briefs Members on the current measures for the import control and surveillance of hairy crabs adopted by the Centre for Food Safety (CFS) of the Food and Environmental Hygiene Department.

Hong Kong's Food Safety Regulatory Mechanism

2. The food safety laws of Hong Kong are mainly laid down in the Public Health and Municipal Services Ordinance (the Ordinance) (Cap. 132), which stipulates that all foods for sale and are intended for human consumption should be fit for human consumption.

3. To safeguard that foods for sale in Hong Kong comply with the statutory requirements and are fit for human consumption, CFS has put in place measures at strategic points of the supply chain within Hong Kong's jurisdiction, including taking food samples for testing (at the import, wholesale and retail levels) within Hong Kong. CFS adopts a risk-based principle in determining the types of food samples to be collected, the frequency and number of samples taken for testing, and the types of laboratory analysis to be conducted.

Import Arrangements for Hairy Crabs

4. Hairy crabs sold in Hong Kong came mainly from the Mainland, from registered aquaculture farms that have undergone quality inspection by the relevant Mainland authorities. In view of the large proportion of foods from the Mainland in the local market, administrative arrangements between Hong Kong and the inspection and quarantine authorities of the Mainland have been put in place to safeguard the safety of food imported from the Mainland to Hong Kong. Under those arrangements, the relevant Mainland authorities would only allow aquaculture farms which have undergone quality inspection and are registered with the Mainland inspection and quarantine authorities to export hairy crabs to Hong Kong. CFS has reminded the trade that hairy crabs from the Mainland should only be imported from aquaculture farms registered in the Mainland. Hairy crabs have also been imported from other places, such as the Netherlands, Taiwan and Japan in recent years.

Dioxins and DL-PCBs

5. Dioxins and dioxin-like polychlorinated biphenyls (DL-PCBs) are environmental pollutants with similar toxic effects. Dioxins are ubiquitous in the environment, occurring naturally (e.g. from volcanic eruptions and forest fires), as by-products of combustion and various industrial processes. DL-PCBs, on the other hand, are more related to industrial activities. Dioxins, once released, contaminate soil surfaces and aquatic sediments in streams, rivers and lakes where hairy crabs live. Hairy crabs scavenge for food at the bottom of these habitats. Dioxins and DL-PCBs bioaccumulate along the food chain. The long-term cumulative risk of dioxins to health includes developmental problems in children and reproductive problems in adults as well as cancer-causing in humans.

6. The Codex Alimentarius Commission (Codex)¹ has not recommended any standards on dioxins and dioxin-like PCBs in foods and our local food safety legislation has not stipulated the limit on the level of dioxins and dioxin-like PCBs in foods. Nevertheless, CFS has made reference to the regulatory arrangement of different places and the local situation. Having taken into the fact that other jurisdictions (the European Union and Taiwan) have set statutory maximum levels for dioxins and dioxin-like PCBs detected in hairy crabs, the results of local studies on dioxins in hairy crabs, and local dietary habits (i.e. people in Hong Kong generally consume both the brown meat and white meat of hairy crabs), CFS categorically set an action level of 6.5 picograms (pg) toxic equivalent per gram (TEQ/g)² for hairy crabs in 2016.

Surveillance of Hairy Crabs

7. CFS conducts surveillance on hairy crabs by taking samples for testing during hairy crab season to ensure that hairy crabs comply with the local requirements including veterinary drug residues (such as nitrofurans and malachite green), metallic contaminants (such as cadmium and mercury), synthetic hormones, colouring matters (such as Sudan dyes), pesticide residues, and dioxins and DL-PCBs.

8. In 2016, three samples of hairy crabs from the Mainland were detected to have DL-PCBs exceeding CFS's action level. Having regard to the testing results, CFS has, since 1 November 2016, instructed the trade to suspend the import into and sale within Hong Kong of hairy crabs from the two concerned aquaculture farms in

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, food control agencies and the international trade in developing food associated standards.

² 1 picogram (pg) toxic equivalent per gram means 1 part per trillion.

Jiangsu Province. For the period from 2014 to 2016, CFS took 298 hairy crab samples for testing. Apart from the three samples taken in 2016 which had exceeded CFS' action level of dioxins and dioxin-like PCBs, the testing results of the remaining samples were satisfactory.

9. CFS has been closely monitoring the local situation, including taking samples of hairy crab at the import and retailer levels for laboratory testing and conducting joint operations with the Customs and Exercise Department. So far this year, as of 25 October 2017, CFS has completed the testing of 144 samples, including 17 samples tested for dioxins and dioxin-like PCBs. One unsatisfactory sample imported from the aquaculture farm in Taoyuan, Taiwan, collected at the import level, was found to contain dioxins and dioxin-like PCBs at a level of 9.86 pg toxic equivalent per gram of the food sample, exceeding the action level adopted by the CFS. The concerned consignments have not entered into the market, and have been marked and sealed by the CFS.

10. To safeguard public health, CFS has instructed the trade to suspend import into and sale within Hong Kong of hairy crabs raised in the same aquaculture farm of the unsatisfactory sample with immediate effect. Other than the hairy crab sample from Taoyuan, Taiwan, the testing results of those other samples are satisfactory.

Communication with the trade

11. Following the incidents of hairy crabs detected with dioxins and DL-PCBs in end-2016, CFS met and exchanged with the trade in January 2017 on CFS' work in monitoring dioxins in foods and matters relating to the import arrangement for hairy crabs. Since then, CFS has continued liaising with the trade and has, through several consultation forums and meetings, reminded the trade that the Centre would continue adopting the action level of no more than 6.5 pg TEQ/g

of food sample for dioxins and dioxin-like PCBs and has informed the trade of the updated list of Mainland aquaculture farms registered for supplying hairy crabs to Hong Kong. CFS also suggested the importers should consider importing a small quantity of hairy crabs initially and voluntarily stop selling them and not to order further quantities until CFS' testing results are available. The arrangement was tried out when local importers imported hairy crabs from Taiwan, Japan and the Netherlands. This is the reason that hairy crabs from the aquaculture farm in Taoyuan, Taiwan, where the abovementioned hairy crab sample which had exceeded CFS's action level for dioxins had come from, did not enter the local market.

Liaison with the Mainland authorities

12. CFS has been liaising closely with the Mainland authorities on the regulatory arrangement for hairy crabs. Both sides review the existing regulatory arrangements over hairy crabs based on science and reasonableness. The liaison will continue.

13. The Mainland inspection and quarantine authorities have released the updated list of registered aquaculture farms eligible for exporting hairy crabs to Hong Kong in September and October this year respectively. CFS has informed the local trade of the updated list which sets out 42 registered aquaculture farms eligible for exporting hairy crabs to Hong Kong (as at 17 October 2017). These are located in Jiangsu, Hubei, Anhui, Hunan, Jiangxi, Heilongjiang and Liaoning Provinces.

14. CFS will continue liaising with the Mainland authorities regarding the import of hairy crabs from the Mainland and maintaining contact with the trade, as well as closely monitor the surveillance results of dioxins and DL-PCBs in hairy crabs and take appropriate action to safeguard public safety and public health.

Advice Sought

15. Members are invited to note the content of this paper and give comments, if any.

Centre for Food Safety

Food and Environmental Hygiene Department

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