USDA Foreign Agricultural Service
GAIN Report
Global Agriculture Information Network
Template Version 2.09

Voluntary Report - Public distribution

Date: 9/6/2007

GAIN Report Number: HK7019

Hong Kong

Food and Agricultural Import Regulations and Standards

Sulphur Dioxide in U.S. Dried Fruit found to exceed HK Permitted Level

2007

Approved by:
Philip Shull
American Consulate General, Hong Kong

Prepared by:
Caroline Yuen

Report Highlights:
U.S. dried fruit exports could be affected by Hong Kong's decision to lower its tolerance level on sulphur dioxide from 2000 ppm to 1000 ppm for most dried fruits. This change comes as part of Hong Kong's overall move to align its list of preservatives and tolerances with Codex standards. Currently, FEHD is in the process of amending its Preservatives Regulations. The permitted level of sulphur dioxide for dried apricots will remain at 2000 ppm, and that for raisins will be set at 1500 ppm after the amendment. Even at the current permitted level of 2000 ppm, a number of retail samples of U.S. apricots and golden raisins were found containing prohibited levels of sulphur dioxide. The HKG is planning to pass the amended regulations, which will be closely in line with Codex standards, by the end of 2007. It is considering a transition period for the trade to comply with the revised permitted level of preservatives. Because U.S. food standards do not follow Codex on all preservatives, it is important for exporters to ensure their products comply with Hong Kong's new regulations before shipping.

Includes PSD Changes: No
Includes Trade Matrix: No
Trade Report
Hong Kong [HK1]
[HK]

U.S. dried fruit exports could be affected by Hong Kong's decision to lower its tolerance level on sulphur dioxide from 2000 ppm to 1000 ppm for most dried fruits. Currently, FEHD is in the process of amending its Preservatives Regulations. The permitted level of sulphur dioxide for dried apricots will remain at 2000 ppm, and that for raisins will be set at 1500 ppm after the amendment. Even at the current permitted level of 2000 ppm, a number of retail samples of U.S. apricots and golden raisins were found containing prohibited levels of sulphur dioxide. The HKG is planning to pass the amended regulations, which will be closely in line with Codex standards, by the end of 2007. The government is considering a transition period for the trade to comply with the revised permitted level of preservatives. Because U.S. food standards do not follow Codex on all preservatives, it is important for exporters to ensure their products comply with Hong Kong's new regulations before shipping.

In August 2007, Hong Kong authorities requested a Hong Kong importer to voluntarily recall a U.S. company's dried apricot and golden raisin because, during a routine food surveillance program for preservatives, sulphur dioxide found in both products exceeds the permitted levels in Hong Kong. The sulphur dioxide level found in the dried apricot sample was 2,900 ppm. The Hong Kong Food and Environmental Hygiene Department requested the Hong Kong importer either to surrender the products to the government for disposal or to return the products to the U.S.

The Hong Kong government has a vigorous food surveillance program. According to FEHD's practices, frequency of inspection of a product category commences with the first violation of the Hong Kong standard. They may retrieve samples at the import, wholesales or retail levels. The incident may also trigger FEHD to test similar products from the same country of origin. This estimation is based on Hong Kong practices following excessive cadmium found in U.S. oysters in recent years.

The U.S. is the largest supplier of dried fruits to Hong Kong. In 2006, Hong Kong imported $3.9 million of raisins, $2.6 million of dried prunes and $0.11 million of dried apricots from the U.S.

Hong Kong Routine Food Surveillance Program

Hong Kong has a very vigorous food surveillance program. Between May and June 2007, some 10,600 food samples were taken for microbiological tests and about 6,300 for chemical tests. While microbiological tests cover pathogenic bacteria and viruses, chemical tests are conducted to detect chemicals such as antioxidants, sweeteners, preservatives, heavy metals, coloring matters, veterinary drug residues and pesticides. Food samples tested included vegetables, fruits, meat, aquatic products, milk products, frozen confections, cereals, and grain products.

The overall satisfactory rate was 99.7%, with 35 samples failing the tests.

Different products have different target tests. For example, vegetables samples are subject to pesticides tests while meat to veterinary drug residues tests. Some general tests are listed below.

For pesticides, tests are conducted for DDT, methamidophos and hexachlorocyclohexane.

For food additives, tests target the commonly-used preservatives, sulphur dioxide, benzoic acid, sorbic acid and propionic acid.

For heavy metals, tests target cadmium, arsenic, mercury and lead.

Milk and frozen confections are subject to microbiological and chemical analyses. Products are tested for total bacterial count and coliform organisms.

Hong Kong Preservatives Regulations

Currently, FEHD is in the process of amending its Preservatives Regulations, which will be closely adhering to Codex standards. Since the U.S. food standards do not necessarily follow the Codex, U.S. food exports to Hong Kong may be affected. According to the proposed amendment, HK's proposed maximum level of sulphur dioxide in dried fruits will be lowered from 2000 ppm to 1000 ppm. While the permitted level of sulphur dioxide for dried apricots will remain at 2000 ppm, that for raisins will be set at 1500 ppm after the amendment. The HKG is planning to pass the amended Regulations by the end of 2007 and is considering to provide a transition period for the trade to comply with the revised permitted level of preservatives.

Further information of the Preservatives Regulations, please refer to Gain#HK7011 and Gain#HK7018

Given below are the permitted levels of dried fruits under the existing Regulations as well as the proposed permitted levels according to the proposed amended Regulations.

Dried Fruit

INS No.	Preservatives	Proposed Permitted Level	Existing Permitted Level
210-213	Benzoic acid	800 ppm	---
385,386	EDTAs	265 ppm	---
220-228,539	Sulphur dioxide	1000 ppm	Figs, dried (2000 ppm) Fruit, dried, other than prunes or figs (2000 ppm) Prunes (2000 ppm)

Dried figs

INS No.	Preservatives	Proposed Permitted Level	Existing Permitted Level
200-203	Sorbic acid	500 ppm	Figs, dried (500 ppm)

Prunes

INS No.	Preservatives	Proposed Permitted Level	Existing Permitted Level
200-203	Sorbic acid	1000 ppm	Prunes (1000 ppm)

Dried Apricot

INS No.	Preservatives	Proposed Permitted Level	Existing Permitted Level
200-203	Sorbic acid	500 ppm	---
220-228,539	Sulphur dioxide	2000 ppm	---

Raisins

INS No.	Preservatives	Proposed Permitted Level	Existing Permitted Level
220-228,539	Sulphur dioxide	1500 ppm	---

Dessicated coconut

INS No.	Preservatives	Proposed Permitted Level	Existing Permitted Level
220-228,539	Sulphur dioxide	50 ppm	---

Trade Statistics

Hong Kong - Imports -Total-
080620 Grapes, Dried (Including Raisins)
Millions of US Dollars
January - December

Country	2004	2005	2006	% Share 2004	% Share 2005	% Share 2006	% Change - 06/05 -
--The World--	4.22	5.66	4.69	100	100	100.00	-17.13
United States	2.38	4.65	3.86	56.31	82.04	82.23	-16.93
Turkey	0.38	0.43	0.17	9.06	7.51	3.71	-59.09
Iran	0.44	0.28	0.15	10.41	4.96	3.25	-45.58
South Africa	0.85	0.20	0.15	20.22	3.51	3.10	-26.76
China	0.05	0.04	0.13	1.22	0.73	2.74	211.52

Hong Kong - Imports -Total-
081310 Apricots, Dried
Millions of US Dollars
January - December

Country	2004	2005	2006	% Share 2004	% Share 2005	% Share 2006	% Change - 06/05 -
--The World--	0.50	0.46	0.45	100	100	100.00	-1.75
Turkey	0.31	0.21	0.24	61.1	46.29	53.19	12.89
United States	0.05	0.12	0.11	10	26.17	23.18	-12.97
China	0.01	0.00	0.07	2.68	0.04	15.29	39219

Hong Kong - Imports -Total-
081320 Prunes, Dried
Millions of US Dollars
January - December

Country	2004	2005	2006	% Share 2004	% Share 2005	% Share 2006	% Change - 06/05 -
--The World--	3.15	2.54	3.10	100	100	100.00	22.35
United States	2.71	2.00	2.56	85.86	78.93	82.41	27.75
Thailand	0.00	0.00	0.33	0	0	10.69	0
Chile	0.07	0.00	0.09	2.06	0	2.74	0

Source: World Trade Atlas --- Hong Kong Census & Statistics Department