

RESPONSE TO COMMENTS RECEIVED FROM THE PUBLIC CONSULTATION ON THE DRAFT FOOD (AMENDMENT NO. X) REGULATIONS 2021

The Singapore Food Agency (SFA) initiated a public consultation on the draft Food (Amendment No. X) Regulations 2021 from 3 May 2021 to 2 July 2021. Concurrently, trading partners and interested parties were notified via World Trade Organisation (WTO) SPS notification G/SPS/N/SGP/69 during the same period.

Comments were sought from stakeholders (industry associations, local food manufacturers, retailers and importers), as well as trading partners and interested parties, on the proposed amendments.

At the close of the public consultation exercise and WTO notification period, SFA received 10 responses. Three of the 10 responses were requests to amend other provisions in the Food Regulations, and were not related to the subject matter under consultation. SFA's responses to the remaining seven responses are summarised below.

(A) Comments on proposed provisions for the use of new food additives and ingredients and extension of use of existing food additives

Two industry members were supportive of the proposed amendments to permit the use of new food additives and ingredients, as well as to extend the use of existing food additives.

(B) Comments on proposed revision of the maximum limits for heavy metals in food to align with Codex maximum limits

Comments, with mixed views, were received from two industry members and an individual. While there was support for the proposed revision of the maximum limits, there was also concerns raised that the adoption of the Codex maximum limits, in particular those that were less stringent than Singapore's current limits (such as cadmium and mercury in salt), appeared to be a loosening of standards on Singapore's part. SFA explained that the Codex Alimentarius Commission is the international food standards setting body and it establishes food standards that protect public health and ensure fair practices in international food trade. SFA has assessed that alignment of Singapore's maximum limits for heavy metals with international standards would continue to meet Singapore's appropriate level of protection.

(C) Comments on proposed revision to Regulation 15(2) to ensure coherence with Regulation 15(4)

Two industry members provided comments, mainly to seek clarification, as they were not aware of the existing definition for “food additives” in the Food Regulations, nor were they aware of the existing requirement in Regulation 15(4) that the purity of permitted food additives must comply with the specifications in the Food Regulations and, in the absence of Food Regulations specifications, with the specifications established by the Joint FAO/WHO Expert Committee on Food Additives (JECFA). SFA has since clarified matters with these industry members.

SFA appreciates the time taken by all parties to submit comments on the draft Food (Amendment No. X) Regulations 2021. We encourage all parties to actively participate in future calls for comments.