

Economic and Employment Council  
Retail Task Force

**COMPARISON OF KEY FEATURES IN THE LICENSING REGIMES FOR SUPERMARKETS  
IN HONG KONG AND SOME OVERSEAS COUNTRIES**

(Findings of desk-top research)

|  | <i>Hong Kong</i>   | <i>Singapore</i>  | <i>United Kingdom</i>   | <i>Victoria (Australia)</i>                       |
|--|--|---|---|---|
| Policy intent<br>(purpose of<br>licence) | <p>To ensure:</p> <ul style="list-style-type: none"> <li>▪ A good standard of hygiene at the premises</li> <li>▪ The wholesomeness of the food supplied therefrom</li> <li>▪ <b>The premises are structurally safe and/or suitable from fire safety point of view*</b></li> </ul> <p><i>* Not required for permits and siu mei &amp; lo mei shop licence</i></p> | To ensure cleanliness, food safety, and prevent food-borne diseases | <p><u>Food premises registration</u><br/>To maintain up-to-date register of food businesses, and facilitate enforcement of food safety regulations</p> <p><u>Butchers licence</u><br/>To prevent cross-contamination from raw meat to ready-to-eat food</p> | To ensure food safety and free from contamination |

|   | Hong Kong   | Singapore   | United Kingdom   | Victoria (Australia)   |
|---|---|---|--|--|
| <p>Main licences required</p> <p><i>(Note: For list of other common licences required, please refer to end of this table)</i></p> | <p><b>Note: HK does not have a supermarket licence per se. Operators apply for licences according to products sold.</b></p> <p>Licences and permits required include:</p> <p><u>Licences (also provisional licences)</u></p> <ul style="list-style-type: none"> <li>▪ Bakery licence</li> <li>▪ Food factory licence</li> <li>▪ Fresh food provision licence</li> <li>▪ Frozen confections factory licence</li> <li>▪ Siu mei &amp; lo mei shop licence</li> </ul> <p><u>Permits</u></p> <ul style="list-style-type: none"> <li>▪ Frozen packaged confections permit</li> <li>▪ Milk permit</li> <li>▪ Non-bottled drinks permit</li> <li>▪ Restricted food permit</li> </ul> | <p><u>Supermarket licence</u></p> <ul style="list-style-type: none"> <li>▪ Sale and preparation of raw and cooked foods</li> <li>▪ Counters or stalls within the supermarket selling cooked foods such as confectionery, roast meats, sushi, etc.</li> </ul> <p><u>Factory permit</u></p> <p>For supermarkets with preparation area like fresh meat, deli, food processing that involves machinery.</p> | <p><u>Food premises registration</u></p> <ul style="list-style-type: none"> <li>▪ To operate a food premises. Councils cannot refuse registration</li> <li>▪ Supermarkets with more than one food outlet within the store (eg partitioned off area for butchery, fish shop, green grocer) need to register each outlet separately</li> <li>▪ There is no need for a separate business registration</li> </ul> <p><u>Butchers licence</u></p> <p>For premises that handle or sell unwrapped raw meat AND ready-to-eat (cooked) foods<sup>1</sup>.</p> | <p><u>Food business registration</u></p> <ul style="list-style-type: none"> <li>▪ To operate a food business involved in handling food or selling pre-packaged food</li> <li>▪ Businesses cannot operate without prior site inspection and approval by the council</li> <li>▪ There is no need for a separate business registration</li> </ul> |
| Issuing authority   | Food and Environmental Hygiene Department   | <p>National Environment Agency (under the Ministry of Environment) – <i>for supermarket licence</i></p> <p>Ministry of Manpower, Occupational Safety Dept – <i>for factory permit</i></p>   | Local city council   | Local city council   |
| Licence validity  | <ul style="list-style-type: none"> <li>▪ Full licence and permit: 1 year, renewable</li> <li>▪ Provisional licence: 6 months</li> </ul>   | 1 year, renewable   | 1 year, renewable  | 1 year, renewable  |

<sup>1</sup> No licence is required if the raw meat is pre-packed and not directly handled at the premises, and if premises only sell raw meat.

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|------------------------------|--|---|--|--|
| Licence fee                  | <p>Varies according to the <b>type of licence</b> and <b>floor area</b>. There is also a fee differential for shops in <b>Urban and the New Territories</b> districts.</p> <ul style="list-style-type: none"> <li>Full licence: \$2,710 to \$258,870 – based on floor area and district</li> <li>Provisional licence: \$1,355 to \$129,435 - based on floor area and district</li> <li>Permits: \$540 (<i>Urban</i>) to \$755 (<i>New Territories</i>)</li> </ul>  | <p>Supermarket licence</p> <ul style="list-style-type: none"> <li>Area &lt; 200 sqm: S\$250 (~HK\$1,180)</li> <li>Area &gt; 200 sqm: S\$500 (~HK\$2,375)</li> </ul>   | <p>Food premises registration is free</p> <p>Butchers licence: £100 (~HK\$1,465)</p> | <p>Fees vary from city to city. Some may specify that fees cover for the cost of assessing the plans and a limited number of site inspections. And fees will be charged for additional site inspections required.</p> <p>Eg. Dandenong City charges A\$165 (~HK\$981) application fee, which covers up to 3 site inspections. A\$50 will be charged for any additional site visits thereafter.</p> |
| Application process duration | <p>FEHD Pledge:</p> <ul style="list-style-type: none"> <li>Acceptance of licence application → Site inspection: <b>7 days</b></li> <li>Confirmation of premises suitability from other agencies → Issue letter of requirements: <b>7 days</b></li> <li>Notification of compliance → Site inspection: <b>8 days</b></li> <li>Final site inspection → Issue of full licence: <b>7 days</b></li> <li>Receipt of certificates of compliance → Issue of provisional licence: <b>Same day</b></li> </ul> <p>No pledge for permits.</p> | <p>NEA pledge:</p> <ul style="list-style-type: none"> <li>Submission of <u>qualified application</u><sup>2</sup> with all the required supporting documents → First site inspection: <b>5 working days</b></li> <li>Site inspection → Issuance of licence: <b>2 working days</b></li> </ul> <p>Normally the elapse time from submission of application to issuance of full or temporary licence is <b>~3 weeks to 1 month</b>. However duration will very much depend on the timeline for setting up the store.</p> | <p>Butchers licence: Pledge written notification within 28 days</p>                  | <p>[Not available]</p>   |

<sup>2</sup> Process duration may be longer if re-inspection or re-submission of required documents are required.

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|------------------------------------|---|---|---|--|
| License application pre-requisites | <p><u>Upon submission of licence/permit application</u></p> <ul style="list-style-type: none"> <li>Application in writing or standard form</li> <li>Scaled layout plan (or sketch layout for permits)</li> </ul> <p><u>Prior to issuance of licence</u></p> <ul style="list-style-type: none"> <li>Documentary proof of hygiene course attended by supervisor (<i>not required for permits</i>)</li> </ul> <p><u>Additional requirements for Bakery and Food Factory licence</u></p> <ul style="list-style-type: none"> <li>Copy of approved building plan indicating communal sanitary fittings</li> <li>Copy of electrical installation certification/endorsement</li> <li>Fire Services Certificate issued by FSD</li> <li>Copy of certificate of compliance and certificate of completion issued by gas contractors (<i>Food Factory licence only</i>)</li> <li>Copy of certificate of communal sump and pump tank fitted with 2 sets of motors and pumps (<i>Food Factory licence only</i>)</li> </ul> | <p><u>Upon submission of application</u></p> <ul style="list-style-type: none"> <li>Scaled layout plan, showing preparation area for various food categories (meat, seafood, bakery, etc), toilets, stores, etc.</li> <li>Documentary proof of typhoid vaccination for all food handlers</li> <li>Detailed schedule of cleaning, pest control and waste disposal programs</li> <li>Photocopy of Food Hygiene Course Certificate (or registered enrolment form) of food handlers</li> <li>Eligibility of applicant. Only local residents and registered business are eligible to apply</li> </ul> <p><u>Prior to issuance of licence</u></p> <ul style="list-style-type: none"> <li>Compliance of list of health requirements for set up of premises.</li> </ul> | <p><u>Food premises registration</u></p> <p>Premises must be registered with the local authority at least 28 days prior to opening.</p> <p><u>Butchers licence</u></p> <p>Application must be submitted at least 28 days before the licence is required.</p> <p>Licence application must include:</p> <ul style="list-style-type: none"> <li>Location and building layout plan</li> <li>Description of operation activity (type of meat, estimated throughput, type of activity, storage details)</li> <li>Description of operation and arrangements and HACCP control procedures (including maintenance, cleaning, water quality, satisfactory water test result, pest control, etc.)</li> <li>Number of staff, staff training and health monitoring procedures (including medical certificates for all staff)</li> <li>Record keeping procedures (of HACCP<sup>3</sup> procedures and staff hygiene training).</li> </ul> | <p><u>Upon submission of application</u></p> <ul style="list-style-type: none"> <li>Town planning permit (from Town Planning Department)</li> <li>Premises floor plan, must be approved by the Health department prior to renovation works</li> </ul> <p><u>Prior to issuance of licence</u></p> <ul style="list-style-type: none"> <li>Food Safety Program<sup>4</sup> must be audited by an approved Food Safety Auditor, or compliance checked by the authority.</li> </ul> |

<sup>3</sup> HACCP stands for Hazard Analysis and Critical Control Point.

<sup>4</sup> **Food Safety Program** must outline how the business will manage food safety, and should be based on HACCP principles, and needs to outline transport, storage, handling of food and related equipment, and staff hygiene. Special conditions are set out for handling, display and serving of foods such as Chinese roast (eg meat, chicken), sashimi/sushi, rotating spit (kebabs).

|  | <i>Hong Kong</i>   | <i>Singapore</i>   | <i>United Kingdom</i>   | <i>Victoria (Australia)</i>  |
|--|--|--|---|--|
| Site inspection for licence approval   | <ul style="list-style-type: none"> <li>▪ Premises to be assessed for suitability before fit-out works commence, and letter of requirements will be issued</li> <li>▪ Final verification inspection carried out by respective departments for hygiene and premises safety, compliance of requirements by FEHD and FSD (separately or jointly)</li> <li>▪ Licences will only be issued when FEHD receives compliance notice from other authorities.</li> </ul> | <ul style="list-style-type: none"> <li>▪ NEA conducts the 1<sup>st</sup> site inspection after application form and supporting documents are processed, and issues a list of health requirements for compliance, to facilitate the renovation or set up of premises</li> <li>▪ When premises set-up is completed, NEA must conduct final site inspection to verify the compliance of health requirements</li> <li>▪ Upon verification of health requirements, the licence will be issued.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Site inspection by licensing authorities (Veterinary Meat Hygiene Advisor, accompanied by Meat Hygiene Service representative) to ensure compliance of health requirements.</li> </ul> | <ul style="list-style-type: none"> <li>▪ Fit-out works can only commence when application and plans are assessed and approved by the council</li> <li>▪ Council must conduct a final inspection for approval before the business can commence business.</li> </ul> |
| Are buildings and fire safety approval pre-requisites for supermarket licensing? | <p>Yes</p> <p>Premises must be suitable in terms of building structure and means of escape. Fire Safety Certificate is required for certain licences<sup>5</sup>.</p>  | <p>No</p> <p>Operator still needs to ensure premises safety, and are required to approach various authorities for requirements and approvals.</p>  | <p>No</p> <p>Operator still needs to ensure premises safety, and are required to approach various authorities for requirements and approvals.</p>   | <p>No</p> <p>Operator still needs to ensure premises safety, and are required to approach various authorities for requirements and approvals.</p>  |
| Temporary or provisional licensing   | <p>Yes - 6 months provisional licence.</p>   | <p>Yes - 1 month, as long as the requirements are not considered hazardous to consumers.</p> <p>NEA inspectors will conduct a subsequent follow-up site visit to ensure full compliance. If operator does not comply with all requirements by the end of 1 month, s/he may appeal for an extension if a valid reason is given. Otherwise the licence may be suspended upon re-inspection.</p>  | <p>None</p>   | <p>None</p>  |

<sup>5</sup> A Fire Services Certificate is required as pre-requisite for application of Bakery Licence and Food Factory Licence, but not others.

|   | Hong Kong  | Singapore   | United Kingdom   | Victoria (Australia)  |
|---|--|---|--|---|
| <p>Other common licences or permits that may be required</p> <p><i>(Note: This is not intended to be a comprehensive list.)</i></p> | <p><u>Product-specific</u></p> <ul style="list-style-type: none"> <li>▪ Licence for listed sellers of poison</li> <li>▪ Pesticide licence</li> <li>▪ Retailer licence in Chinese herbal medicines</li> </ul> <p><u>Others</u></p> <ul style="list-style-type: none"> <li>▪ Business registration certificate</li> <li>▪ Coin-operated automatic vending machine permit</li> <li>▪ General restaurant licence (Food Court)</li> <li>▪ Import licence/permits</li> <li>▪ Licence for storage of dangerous goods</li> <li>▪ Light refreshment restaurant licence (Café Counter)</li> <li>▪ Liquor licence</li> <li>▪ Mobile radio system mobile station licence</li> <li>▪ Permit to use and operate kiddie ride</li> <li>▪ Registration of boilers and pressure vessels</li> <li>▪ Trade promotion competition licence</li> <li>▪ Water pollution control ordinance.</li> </ul> <p><i>Source: Company A, Company B, BLIC</i></p> | <p><u>Product-specific</u></p> <ul style="list-style-type: none"> <li>▪ Tobacco retail licence</li> <li>▪ Liquor licence</li> </ul> <p><u>Others</u></p> <ul style="list-style-type: none"> <li>▪ Advertisement licence</li> <li>▪ Business registration</li> <li>▪ General radio communication station licence</li> <li>▪ Localised/Wide-area private network licence</li> <li>▪ Music licence</li> <li>▪ Non-Residential TV licence.</li> </ul> <p><i>Source: <a href="http://www.business.gov.sg">www.business.gov.sg</a>, Company A Singapore contact (from RTF member)</i></p> | <p><u>Product-specific</u></p> <ul style="list-style-type: none"> <li>▪ Liquor licence</li> <li>▪ Excise Game licence</li> <li>▪ Game Dealer licence</li> </ul> <p><u>Others</u></p> <ul style="list-style-type: none"> <li>▪ Petrol licence</li> <li>▪ Public entertainment licence</li> <li>▪ Television licence</li> <li>▪ Two-way radio licence.</li> </ul> <p><i>Source: Company B UK contact (from RTF member)</i></p> | <p><u>Product-specific</u></p> <ul style="list-style-type: none"> <li>▪ Cameo Ham licence</li> <li>▪ Liquor licence</li> <li>▪ Tobacco retailers licence</li> </ul> <p><u>Others</u></p> <ul style="list-style-type: none"> <li>▪ Licence to keep dangerous goods</li> <li>▪ Permit to conduct a trade promotion.</li> </ul> <p><i>Source: <a href="http://www.transactions.business.gov.au">www.transactions.business.gov.au</a></i></p> |