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To: Mrs Constance Li
Clerk to Panel
Legislative Council Panel on Food Safety and Environmental Hygiene
Legislative Council Building
8 Jackson Road
Central

Dear Madam

24 May 2004

Re: Comments on the consultation paper:

“Prevention of Avian influenza: Consultation on Long term Direction to Minimize the Risk of Human Infection” by Health, Welfare and Food Bureau, April 2004/5/24

I refer to the letter (14 April 2004) you sent to Professor Jean Woo asking for comments from the Department of Community and Family Medicine on the captioned Report. Prof. Woo has asked me to respond to your request, and I have the following comments on the Report:-

1. The long term goal of sustaining zero transmission is the appropriate goal for the Government and the community to achieve, and is in keeping with the public health ideal. However this is not going to be an easy goal to achieve if the strategies to attain this goal meet with resistance from vested interests. I totally agree with the statement (p3, Chapter 2, 2.3) that “the Government has confirmed our policy that protection of public health should and must remain our number one priority”.
2. Having set this goal, Government has implemented various measures of disease surveillance in the local farms and imported poultry, and the monitoring, testing and immunization of live poultry. One point I need to make is that the introduction of two rest days per month at the retail outlets and the daily cleansing activities, while a needed measure to improve the cleanliness of these outlets, are not adequate in eliminating the source of infection - live poultry harbouring the virus. The Government now proposes additional measures aiming at risk reduction in the retail outlets.
3. Central slaughtering of chicken is the best course of action to eliminate contact by the general public with live poultry. While central slaughtering does not in itself eliminate avian influenza outbreak in nature and in poultry farms, the implementation of stringent workplace environmental hygiene measures and personal protection (against airborne and contact transmission) in a centralized facility should minimize infection risk from occupational exposure. In this respect, even in the event of epidemics of avian influenza in wild birds and live poultry farms, the risk of disease transmission to the general public is still very small, if proper food hygiene and thorough cooking is practised.
4. Regarding the issue of quantifying the risk to the public (p14, Chapter 4, 4.14), I would like to add that risk assessment can be done in the absence of a complete set of data on reassortment and mutation of the avian influenza virus. In fact, rarely in risk assessment exercise do scientists conducting risk assessment have the full set of scientific data at hand. The risk of the emergence of a new pathogenic strain pathogenic to humans hinges on the rate of mutation and the probability of reassortment of genetic materials. Using principles of population genetics, this probability can be estimated and quantified, and with this estimate, the probability of transmission from birds to the retail workers and to customers can then be worked out, based on historical disease transmission data. The

precision of the risk estimate can also be quantified using statistical methods. Conducting a risk assessment using these principles would yield quantitative risk estimates, with precision range of the estimate and specified assumptions for the calculations. This would provide more objective evidence for the action by Government that can be used to weigh against the huge costs to society on life and health, with all the accompanying indirect costs and associated impact on other aspects like tourism and compensation to poultry farmers and other operators. Likewise, the dubious “benefits” of the traditional eating habits and on the restaurant and catering business should also be quantified (with different scenarios based on different assumptions) as a comparison.

5. Maintaining the status quo is not an option. Approach A is clearly superior to Approach B. The risk of contacting the live virus especially through inhalation is eliminated. The risk of food poisoning is also less than in Approach B. The cost is likely to be much lower. It must be remembered that, given the hectic lifestyle in Hong Kong, not all customers who purchase fresh poultry can afford to consume them without having to refrigerate the freshly slaughtered bird. In effect, the slaughtered birds still has to undergo a period of chilling (whether at home or in a restaurant) before they are consumed.
6. I fully agree with the statement on the sustainability assessment (p21, Chapter 6, 6.11).
7. As for the medium term measures, the re-design of the retail outlet is essential to reduce infection risk in the current practice. It must, however, remain as an interim measure in our efforts to achieve the eventual long-term goal of central slaughtering. To accelerate the transition and minimize cost, this provision should be limited to a few outlets while more resources can be spent on the “buy-out package” and in the setting up of the central facilities. The price of the “freshly slaughtered” poultry can then be decided by market force – those willing and able to pay for the extra cost (including time to travel to and shop at these re-designed outlets) would be able to enjoy their culinary delights while the majority of consumers will find it cheaper to buy chilled chickens available in supermarkets and other retail outlets selling chilled chickens.

In conclusion, I commend the efforts by the Health, Welfare and Food Bureau in proposing this initiative. It is well planned and in keeping with public health principles and practice. If the Government proposal can be backed with quantitative

data on risk assessment, I am confident that it will be accepted by the majority of the public. It is inevitable that there will be objections from a minority with vested interests. In the implementation of the proposed measures, while it is important to negotiate with the trade on various means of assistance that Government can provide them, Government should not lose sight of the overall goal – that protection of public health is and will remain the first priority, and Approach A is the better option of the two. The sale of live poultry should be phased out.

Sincerely

Wong Tze Wai
Professor