

To Whom It May Concern:

Opinions on the Avian Influenza Prevention Policy Consultation

To minimize the risks of human infection of Avian Influenza (AI), the government proposed various policies to minimize the contact between the public and live poultry at retail markets. I do agree that the risks of human infection of AI could be minimized by reducing the possible contacts between the public and live poultry at retail markets, which appears to be the most direct solution to the problem as the principle mode of transmission of AI from poultry to human is through direct contacts. Despite the huge executive difficulties involved, theoretically, these measures should be effective to minimize the risks of human infection of AI. However, I query the practicality and cost efficiency of these proposed policies.

I agree that AI viruses, just like other veterinary viruses, cannot be eradicated and the risks that they may affect the poultry population cannot be completely eliminated. However, instead of minimizing the possible direct contacts in the retail end of the poultry industry, more effort should be directed to minimize the possibility of the placing AI infected poultry in the retail market, i.e. more sensitive and preventive surveillance measures should be implemented to prevent AI infected poultry flowing from local farms to the retail markets. Local or regional outbreaks of AI in the future are foreseeable. Preventing large scale outbreaks and stopping AI infected poultry from reaching the retail market are the keys of the problem. Rapid, sensitive and high throughput diagnoses, as well as effective isolation policies to contain and localize the AI infected poultry, are essential to keep the AI viruses away from the general public, which is considered to be much more cost efficient than assuming that AI infected poultry are already present in the retail market and try to separate these AI infected poultry from the customers.

Specific comments:

1. Conversion works on Poultry Stall in wet markets (5.2-5.10)

The design of the new market poultry stall will definitely reduce the possible contacts between customers and live poultry. However, the success of such system strictly relies on the self-discipline of the retailers, which is completely unreliable. Moreover, keeping live poultry in a closed area creates other biological problems, e.g. enhanced transmission of pathogenic agents, poor health conditions of the live poultry. The cost of conversion work and annual maintenance

are too expensive and unreasonable for retailers to afford, particular for the live poultry stalls outside FEDH wet markets. The government proposed to reduce the number of live poultry markets by a voluntary buy-out package for retailers and a huge executive difficulty is foreseeable. The current designed operational environment of retail outlet has to be redesigned to avoid the above problems, e.g. To avoid direct contacts with customers, I query the necessity of using a close system with acrylic/glass panel.

2. Separating Local and Mainland chickens at wholesale level (5.3)

I totally agree with this policy. Instead of “blind” prevention by minimizing the human/poultry direct contacts, tracing the source of AI viruses and stopping them from the reaching the retail market seems to be more rational and efficient. Separating these two major sources of poultry could definitely help to trace and stop the possible source of AI viruses. It should be noted that the mass and sensitive surveillance measures should be implemented at and before the wholesale level, in order to prevent the AI viruses from reaching the retail market.

3. Strengthen Bio-security measures at farm level (5.3 and 6.10)

I totally agree with this policy, which appeared to be the most basic concern of the AI problem. Better vaccination campaigns should be implemented, or funding should be directed to local universities for developing a suitable vaccine with improved efficacy. New bio-security standards should carefully be carefully designed specifically for those small scale farms. Removing existing chicken farms to a more remote area does not seem to be possible, practical and necessary if biosecurity standard of the farm are strengthened enough.

4. Central slaughtering: the “Cold Chain” concept (6.4-6.6) and “freshly slaughter chicken” concept (6.7-6.10)

The “cold chain” concept refers to centralized slaughtering with chilled poultry sold in retail markets. The “freshly slaughter chicken” semi-centralized slaughtering in regional slaughtering hubs and dressed fresh poultry will be delivered to the target places. I agree that both concepts will significantly minimize general public/poultry direct contacts and therefore reduce the risks of human AI infection, if we assume that AI viruses can reach to the retail wet markets easily. It is foreseeable that centralized slaughtering would rise to a series of new problems regarding food safety, occupational risks, unemployment etc. The executive costs for such policies are huge and personally, I do not think these “blind” policies are cost effective. If good surveillance

campaigns can effectively detect AI viruses at farm level or wholesale level before it reaches the retail level, I could not see any needs for implementation of centralized slaughtering policies.

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