

Consumer Council**Response to the Administration's Consultation Paper on
Prevention of Avian Influenza:
Long Term Direction to Minimize the Risk of Human Infection**

1. The Consumer Council (CC) welcomes this opportunity to provide comments to the Panel on consultation on long-term direction to minimize the risk of human infection of avian influenza.

2. CC agrees with the Government that there is an urgent need to review the existing modus operandi of the live poultry trade, especially at the retail end, and that immediate and medium term measures should be introduced to minimize the health risk posed by avian influenza. It is said in the Consultation Paper that past experience has shown that the principal mode of transmission of avian influenza virus from poultry to human is through contact with poultry or their faeces. The Government therefore opines that the most effective way to minimize the health risk posed by avian influenza is to reduce as far as possible the contact between human and live poultry.

Immediate and Medium Term Improvement Measures

3. CC supports the immediate improvement measures to counter the risk of the outbreak of avian influenza through such measures as:

- Increasing the number of rest days per month, provided that the number is reasonable and not disruptive to the business of the live poultry trade;
- Strengthening enforcement actions against breaches of hygiene-related tenancy/licensing conditions;
- Separating the wholesale markets for local and Mainland chickens; and
- Strengthening the bio-security of local poultry farms to the highest standard.

4. In terms of medium term improvement measures, the Government proposes to redesign the live poultry retail outlets so that live poultry can continue to be sold at the retail level but in a much-reduced scale and under a completely new environment. An initial assessment of the medium term policy is that only few wet markets could meet the new requirements for accommodating poultry stalls.

5. CC believes that public health is the most important consideration in terms of consumer protection. While noting the possible effect the reduction of the number of stalls available in markets may have on the livelihood of members of the live poultry trade, CC agrees that the new design could in principle segregate customers from live poultry, thus minimizes their exposure to health risk.

Long Term Strategy

6. The Government has proposed two long term options to combat the threat of avian influenza: (i) the "cold-chain" approach for all poultry meat to be sold at retail outlets, with the slaughtering process conducted in one slaughterhouse; and (ii) the "freshly slaughtered chickens" approach which allows the slaughtering process to be conducted in a few regional slaughter hubs.

7. CC has conducted a consumer opinion survey to assess the preference of consumers. In the survey, 29.2% of the consumers interviewed believe that central slaughtering is the most effective method to eliminate the risk of avian influenza, 13.4% believe the option of adopting a few regional slaughtering hubs will be effective, and 48.6% support maintaining the status quo with medium term improvement measures.

8. However, there is a significant change in opinion when the survey question is rephrased so as to explicitly inform interviewees of the impact of the "cold-chain" approach: no fresh poultry will be available for sale at retail outlets, and that under the "freshly slaughtered chickens" approach: consumers are only able to purchase fresh poultry in some designated areas. In response to the rephrased question, 20% support regional slaughtering hubs and only 10% support having a central slaughtering house.

9. The survey also indicates that the interviewees' perception of likelihood of risk has bearing on which long-term approach they will prefer. 50% of those supporting regional slaughtering hubs think avian influenza is likely or highly likely to reappear. On the other hand, only 29% of those supporting maintaining the status quo thinks the virus may re-appear. Amongst those believing it is highly probable for avian influenza to re-appear, 57% support the Government's long-term options.

10. In the consultation paper, the Government assesses the risk of outbreak of avian influenza in Hong Kong as highly probable and is determined to implement either the "cold-chain" approach or the "freshly-slaughtered chickens" approach in a bid to protect public health. If both options can equally achieve the goal of zero infection and transmission in Hong Kong, the survey indicates a consumer preference for the "freshly slaughtered chickens" approach. Strengthening consumer education on the awareness of the risk of avian influenza will be instrumental to the implementation of the strategy to be adopted. In this respect, CC is willing to work with the Department of Health and the Food and Environmental Hygiene Department to promote consumer awareness of this health issue.

11. It is believed that the immediate and medium term measures will help the segregation of customers from live poultry and in turn reduce the potential threat of avian influenza to humans. The time when the Government will come to implement its long-term strategy may affect whether the medium term measures can be carried through. For instance, retail outlet operators may be discouraged from investing in the improvement of facilities, or even cease operation.

12. CC is always concerned with policy implications on the fresh food market and the food retailing industry. According to the survey, over 48% of the household will reduce the number of trips to wet markets if no fresh poultry is allowed for sale in wet markets or if fresh poultry can only be bought in limited designated areas. The survey also shows that 30% of the interviewees believe the "cold-chain" approach will have a long-term adverse effect on local eating culture.

13. In its report "Competition in the Foodstuffs and Household Necessities Retailing Sector" in 2003, CC suggested that:

Government could perform a facilitation role to help create a vibrant and competitive environment for market participants... ensuring diversity, whilst maintaining traditional strengths, in fresh produce retailing

14. For that purpose, it is suggested that the Government actively encourage the trade to implement the relevant measures, whilst assessing at the same time, the possible impact of the proposed strategic approaches on the fresh food market and the food retailing industry.

Conclusion

15. CC sees consumer health as a matter of paramount importance. If the risk of the outbreak of avian influenza is high, the importance of making choices available to consumers will be overtaken by health considerations. Under those circumstances,

the survey reflects a consumer preference for the "freshly slaughtered chickens" approach. CC would be happy to work with the Government to promote public education. Moreover, CC would urge the Government to closely monitor the effectiveness of the immediate and medium term measures, and assist market participants to create a hygienic, vibrant and competitive environment so as to maintain the traditional strengths in fresh produce retailing.

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