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**Response to the Consultation Paper Dated April 2004 submitted by A.E. James,  
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**Prevention of Avian Influenza: Consultation on Long Term Direction to  
Minimise the Risk of Human Infection**

1. The strategic proposals presented in the paper have been studied and the following comments are submitted for consideration.
2. Involving the veterinary profession in the whole poultry meat supply chain from farms to tables at both policy making and implementation levels is deemed to be absolutely essential no matter what approach the Government may eventually take. Veterinarians are the only professional people with comprehensive and in-depth university training to deal with all public health aspects of the poultry meat supply chain. No other disciplines of training can replace veterinarians' role in providing knowledge-based professional advice and clinical-based technical support as far as veterinary public health is concerned. The significance of the veterinary profession in the production of safe poultry meat supply is evident from the current practice in China and most (if not all) developed countries. The Hong Kong SAR Government is urged to embrace the veterinary profession in its planning and implementation process for safe poultry meat supply in Hong Kong.
3. The Government's long-term vision to achieve "zero transmission and infection in humans" by separating the public in Hong Kong from live poultry is unrealistic, regardless of which proposed approach is to be adopted. The approaches described overlook the epidemiological picture of avian influenza (AI) particularly in relation to other important sources of infection and risk factors. These may be associated with for examples, non-poultry birds, migratory birds, significant human movements from across-the-border and overseas, contaminated poultry products. Compared to the other serious/fatal cross-species public health risks, the real threat to humans posed by AI viruses in Hong Kong does not really stand out, when one considers its potential for undergoing subsequent re-assortment with human influenza viruses and bringing out a human-adapted AI strain that is highly transmissible and deadly in other regions of the world. The chance of producing such new virus strain is proportional to the probability of successful exposure of AI virus to people co-infected with human influenza virus and the probability of successful re-assortment among these viruses in the

co-infected host, therefore if a highly devastating human-adapted AI virus strain is to emerge, the likely location would be in regions conducting the practices of mixing of various wild birds and/or poultry species, high levels of bird-human contact and inadequate government veterinary services and/or systemic surveillance for AI. This was evident in Hong Kong in 1997 (not now) and has been seen in our neighbouring regions just recently. Based on published epidemiologic data by authoritative academic bodies, it is difficult to see this happening in Hong Kong given the current surveillance, preventive and control systems for AI viruses in Hong Kong, therefore the risk of introducing an AI-derived public health problem in humans through the existing poultry meat supply practice in Hong Kong is extremely small and changes to the food-processing as outlined in the proposals will not alter these risks appreciably.

4. The “cold-chain” approach can minimize the contact between the public and live poultry; however, it is still impossible for it to achieve zero human transmission and infection because it is not eliminating all other infection sources and risk factors as discussed above. On the other hand, the socio-economic and health impacts of such approach should not be underestimated. This approach would upset the traditional but yet still popular dining culture in Hong Kong which happens to be a major selling point for our tourism industry and subsequently affect local employment. The Government must be fully prepared to deal with life-threatening bacteria such as *Campylobacter* and *Salmonella* which continue to be found in various types of central poultry meat processing system in many developed countries and are still the predominate food-borne pathogens affecting human life worldwide. Therefore this approach could pose another kind of health threat to the public in Hong Kong. More importantly, given time, the approach might also encourage illegal and other uncontrolled sources of AI entry, of which the public health impacts would be far more devastating. In his recent public speech representing the WHO, Professor Robert G Webster of St. Jude Children’s Research Hospital has clearly pointed out that a central poultry slaughter system was not necessary in Hong Kong at this stage while commending the Hong Kong Government on its success of preventing AI incursion through the existing AI surveillance and biosecurity systems .
5. The “freshly slaughtered chickens” approach may retain our unique dining culture but would still allow the other drawbacks of the “cold-chain” approach and some contacts between the public and live poultry to some extent. Although this approach may appear to represent moderation between the current live bird market

approach and the “cold-chain” approach, it has no appreciable superiority over either approach in terms of improving the overall risk level of introducing human-adapted AI viruses into Hong Kong as already mentioned above. After all, for this approach to significantly reduce the risk of human exposure to AI viruses from live poultry, the very effective monitoring systems that have been in place at all critical control points would need to continue.

6. Finally, having considered all major epidemiologic situations and evidences available in Hong Kong and the surrounding regions, it would seem that the current strategies used by the Government to manage risks associated with AI are already systemic and vigilant enough to minimise the risk of human infection on a long-term basis. The stepped-up surveillance programmes and biosecurity measures have proven very successful in warding off any AI incursion during the recent raging HPAI outbreaks in the regional neighbourhood, not to mention the previous success in controlling local outbreaks. Therefore, there is no reason to suspect that the current practices should not continue to work effectively should the Government decide not to adopt the two proposed approaches (A or B). However, it is strongly recommended that despite what the Government decides, that further improvements be made by the involvement of veterinary expertise over and above the input of other health experts at all Government levels but in particular at the senior executive levels of the Health Welfare and Food Bureau and veterinary expertise must continue in the current surveillance and biosecurity measures on the farm and in the processing of poultry for food and these recommendations should be regularly reviewed with all measures adjusted according to the change in the local, regional and global situations associated with AI.