



HONG KONG RETAIL MANAGEMENT ASSOCIATION

香港零售管理協會

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Ms Priscilla To
Health, Welfare and Food Bureau
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Dear Ms To

PREVENTION OF AVIAN INFLUENZA: CONSULTATION ON LONG TERM DIRECTION TO MINIMIZE THE RISK OF HUMAN INFECTION

Avian flu is a highly infectious, pernicious, and, in some cases, deadly disease. On account of this, the Hong Kong Retail Management Association (HKRMA) fully agree with the Government's view in Chapter 4.14 that Hong Kong "can not afford to experience another avian influenza outbreak that could lead to a major health incident". Furthermore, as acknowledged in Chapter 2.3, we fully agree that "the protection of public health should and must remain our number one priority".

It is an undisputable fact that human contact with live poultry and slaughtering in close contact with humans poses serious health risks. Exposure of Hong Kong's densely populated community to a large amount of live poultry must be avoided.

Accordingly, we agree with the Government's views in Chapters 2.1 and 4.12 that "the most effective way to minimize the health risk posed by avian influenza is to reduce as far as possible the contact between humans and live poultry" and that "as long as there is still close contact between humans and live poultry, the risk to human health posed by avian influenza cannot be underestimated."

HKRMA believes that Central Slaughtering (Approach A in the government report) is the only option available to the Government if the protection of public health really is its number one priority. Hong Kong simply must move to central slaughtering and the concept of the "cold chain" should be applied to the sale of the poultry meat at retail outlets.

Risks

Should avian influenza jump the species barrier to humans again & acquire human-to-human transmission capability, the effect on Hong Kong and the world would be

potentially a devastating flu pandemic killing potentially millions of people globally. The cost to human life & the world's economy would be devastating with a crowded place like Hong Kong being among the worst hit. It is the view of the HKRMA that such a scenario would make the SARS crisis appear insignificant in comparison due to the ease of human-to-human transmission of influenza generally & the high human death rate of H5N1 in particular.

Hong Kong simply cannot afford to maintain the status quo with so much at stake. Strategic planning & rapid decisive action are essential as the longer we wait the more likely a further outbreak will occur.

Individual tastes of certain consumers or the livelihoods of the trade, although important, must never be allowed to take priority over human life & the devastating economic fall out for Hong Kong and the rest of the world.

The International Situation

Years ago before the advent of refrigeration, every Country in the world would have had to slaughter live chicken in markets rather like is still the case in Hong Kong & some developing countries today.

Nowadays, developed Countries & many developing Countries process the overwhelming majority of poultry in automated centralized slaughtering facilities which then chill or freeze them for the following reasons:

1. Control of hygiene
2. Government meat inspectors inspect the carcass & viscera of each bird to ensure that it is fit for human consumption. It is a serious offence in law to sell such condemned birds
3. Labour & Distribution efficiency keeps cost down for the consumer

Hong Kong now needs to follow the example set by the global community.

Poultry Farming

Additionally, most poultry companies have guidelines & rules regarding the location of poultry farms in terms of proximity to each other given the prevailing wind direction. This is a very important factor in disease control as many avian diseases are airborne. Hong Kong does not have enough land space to accommodate such a measure & consideration should also be given as to Hong Kong's suitability as a place for the farming of poultry.

Poultry Meat Inspection

Unlike with pork, beef or goats, there is no post slaughter poultry meat inspection carried out in local wet markets. This is of public health concern given that a % of all birds carry diseases which are often not possible to detect until after slaughter & evisceration and would in most other jurisdictions be rendered unfit for human consumption by government poultry meat inspectors.

In Hong Kong therefore, in the overwhelming majority of cases; such a diseased poultry carcass (that would be unfit for human consumption using International norms) would in fact be sold & consumed resulting in a public health risk.

Central slaughtering would enable the Food & Environmental Hygiene Department to establish a Poultry Meat Inspection system.

Immediate Improvement Measures

The measures proposed will have limited effectiveness & are only acceptable in the very short term.

Medium Term Improvement Measures

The measures proposed will have limited effectiveness & are only acceptable in the short term to medium term.

Permanent Solution

One central slaughtering facility supplying chilled chickens is the option that poses the least risk, not only from avian influenza, but also for other disease causing organisms, which grow on non-chilled, ambient poultry meat, which would be, in itself illegal in most other jurisdictions.

Such facilities already exist in Shenzhen & the rest of Guangdong (having supplied chilled chicken to Hong Kong) and given that no capital expenditure is involved, this may be the best option as it could be made effective in a very short time. Local birds farmed in Hong Kong could be sent to such facilities for slaughter & returned to Hong Kong inspected & chilled for sale to consumers.

Although traditionally, some local people prefer freshly killed chickens, Hong Kong must now move into the 21st century and ban the practiced in the interest of public health.

We acknowledge that there will be persons in the poultry trade that will be affected by moving to central slaughtering and we are sympathetic to their economic plight. However, we believe that the affected persons can adequately compensated by the Government as set out in Chapter 6.5.

If the Government does decide to take Approach B, then clearly:

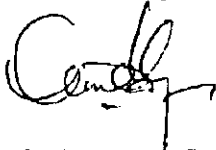
- (i) public health is not its number one priority;
- (ii) it is underestimating the risk to human health posed by avian influenza;
- (iii) it will have failed in its goal to have reduced as far as possible the contact between humans and live poultry;
- (iv) by continuing to adopt third world standards in the poultry industry, it does not aspire to become Asia's World City; and
- (v) it will have increased the health risks for 7 million people in order to satisfy the economic interests of 6,500 persons in the poultry trade.

HKRMA therefore does not support the setting up of 'regional' slaughtering hubs supplying non-chilled chickens (Approach B) for the above reasons.

I hope the above comments will be useful in assisting the Government's review on the subject.

In the meantime, should you have any queries, please do not hesitate to contact the undersigned at 2866 8311.

Yours sincerely,



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Executive Director

c.c. Mrs Selina Chow, Legislative Councillor, Wholesale & Retail.
Mrs Constance Li, Clerk to Legco Panel on Food Safety and Environmental Hygiene.