



香港中華廠商聯合會
The Chinese Manufacturers' Association of Hong Kong
(一九三四年成立 Established in 1934)



31st May, 2004

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Mr Francis Lau

The Hon Fred Li, JP
Chairman
Panel on Food Safety and Environmental Hygiene
Legislative Council
Legislative Council Building
8 Jackson Road
Hong Kong

Dear Mr Li,

**Consultation on Prevention of Avian Influenza:
Long Term Direction to Minimize the Risk of Human Infection**

Whilst the Association are as concerned as anyone else on the dangers of Avian Influenza, we are concerned that without clear assessment of "alternatives", we might end up with a "cure" that is worse than the disease. For example:

(1) Economic Impact

- Central processing and cold chain in HK is not feasible for pure economic considerations and will result in the total destruction of the local poultry trade as we know it to-day.
- A central processing center in Hong Kong will be a white elephant. It is not cost effective and no matter how we do it, the processing center will ultimately be located across the border in China for cost reasons.
- Forget then about our chicken farms, and all those people involved in the live bird trading, transporting and wet market fresh retailing. Whilst achieving separation, the cost of tens of thousands of jobs, the cost of a way of our life, and the cost of pricing power being concentrated into just a few hands must be carefully considered.

Recommendations

- For the choice of less evils, if we must accept separation, having multi location local processing centers is a more desirable compromise.

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(2) Public health consideration

- We know the dangers of avian flu, but do not know the downside and the risks involved in central processing. Concentrated processing into a huge center have been responsible for several incidence of major outbreaks of food poisoning of national proportions elsewhere.
- Chicken is such an important part of our diet and because it is usually consumed fresh, if there is a bug, through central processing, this will spread in our community and affect a huge proportion of our population before it is caught.
- Central processing and cold chain will also mean the consumption of less fresh meat and could open the door to a number of other diseases.

Recommendations

- Before we embark on central processing, we need to be assured that central processing and cold chain is indeed better and does not pose new health risks. The government should examine experience in other jurisdictions with central processing and cold chain to ensure that any possible health risks is thoroughly researched and that the cure is not worst than the disease.

The Association will only support cold chain and central processing after thorough research as recommended above.

Thank you for your attention.

Yours sincerely,

 Francis Lau
 Secretary-General

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