The Hong Kong Racing Pigeon Association Ltd.

香港中區昃臣道八號

立法會大樓

香港特別行政區立法會

諸位議員先生

關於對《2006 年公眾衛生（動物及禽鳥）（展覽）（修訂）規例》

賽鴿牌照及牌照費的意見

諸位議員先生：

香港賽鴿會已收到由馬朱雪履女士發來《2006 年公共衛生（動物及禽鳥）（展覽）（修訂）規例》小組委員會 2006 年 9 月 25 日舉行的會議之函件，本會及本人也認真閱讀並力圖全面理解今年七月七日刊於憲報上的《2006 年公共衛生（動物及禽鳥）（展覽）（修訂）規例》調整動物禽鳥展覽牌照費用中有關理據及修訂法例等主要內容。本會從公共衛生、生物保安條件、發牌及牌照費用理據等多方面綜合考慮，對發牌理據及牌照費用仍持不同意見，綜合如下：

一、我會歡迎政府對香港賽鴿會註冊會員之鴿棚實行註冊登記和發牌制度。這一制度的實行有利於公共衛生，也有利香港賽鴿會註冊會員所養

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賽鴿能順利進入中國內地放飛訓練和競翔比賽。正如 1997 年後，香港特別行政區政府先後要求中國內地的供港活禽、活豬、活牛之養殖場實施註冊登記制度一樣。事實上，早於 2000 年，香港賽鴿會在中國檢驗檢疫部門的支持和有關專家的指導下，就試圖自行建立並促請政府實行這一制度，已參照內地供港畜禽養殖場的做法設置《香港賽鴿會註冊會員登記鴿棚管理手冊》（詳見附件一：《香港賽鴿會註冊會員登記鴿棚管理手冊》（式樣稿））進行管理，可惜由於當時香港特別行政區政府未能理解、支持和幫助香港賽鴿會與中國檢驗檢疫部門談判香港賽鴿進入內地的檢疫衛生條件而促進這一註冊制度的實行，加之香港賽鴿進入內地的訓練和競翔活動自 1997 年來先後兩次因禽流感被中斷，前後時間跨度達 7 年未獲准進入中國內地，使香港賽鴿會按原計劃自行管理的積極性受挫，因而使本可以早於現時立例規管六年，且香港賽鴿會本可以積極配合政府規管的註冊制度和管理措施胎死腹中。

二、用動物/禽鳥展覽的名義發牌不妥不當，因而所發生的牌照費用肯定偏高。一如我會反對將賽鴿列入《畜禽條例》規管一樣，以動物/禽鳥展覽的名義發牌也是不妥不當不恰切的。賽鴿也可稱和平鴿，有展示和平祈求大同的意義但不是展覽；賽鴿是一種體育活動，也是一種高尚的運動，雖未正式或全部列入奧林匹克運動項目，但相信最終會列入。飼養賽

鴿有飼養者的愛好，有和平的理念及展示，也是賽鴿運動之必須和準備。展覽有展示的含意，但展覽不局限展示。因爲展覽之展示後，或是欣賞研究(無買賣之意者)，或是滿意認可並進行談判成交(有買賣成交之實者)，賽鴿作爲和平展示但一般不會買賣。故我會強烈認爲：以動物/禽鳥展覽之名義發牌不妥不當不恰切。上述一我會已表達歡迎政府對香港賽鴿會註冊會員之鴿棚實行註冊登記和發牌制度的意見，我會也表示會配合政府具體協助對註冊鴿棚實施管理。但如一定欲給賽鴿棚實行註冊登記和發牌制度尋找立例的依據，最簡單快捷、妥當恰切的辦法是政府就香港賽鴿進入中國內地放飛和競翔比賽事宜致函中國檢驗檢疫部門，我會堅信：不論從世貿規則和不同關稅區間之貿易對等關係角度，抑或從中央對香港特別行政區的支持及香港賽鴿會對國內賽鴿運動的支持的角度，中國檢驗檢疫部門會給予支持並提出註冊鴿棚等檢疫衛生條件，這樣，對我會註冊會員之鴿棚實行註冊登記和發牌制度以加強規管也就順理成章，水到渠成。就一如香港特別行政區政府要求內地供港畜禽養殖場實行註冊登記一樣，而且這比用“動物/禽鳥展覽”來得名正言順。

因爲上述原因，參考香港政府要求中國內地供港畜禽場註冊登記，內地實行零收費註冊，我會要求牌照費應爲零費用或以港幣壹圓的象徵性收費，以支持展示和平、本屬體育運動項目性質、非盈利性的賽鴿事業。

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三、我會要特別強調的是：根據美國信鴿聯合會(The American Racing Pigeon Union)、美國農業部農業研究所(Agriculture Research Service)等機構發佈的研究報告，早在 1994 年美國依阿華國家獸醫服務實驗室（NVSL）就開展禽流感對鴿子影響的研究，其結論是：**禽流感不會從其他禽鳥傳染給鴿子；鴿子也不會受到禽流感病毒的攻擊而發病；更不會攜帶禽流感病毒而對其他禽鳥造成危害**“（詳見附件二: Susceptibility of pigeons to avian influenza）。2000 年 10 月，澳大利亞獸醫博士 Gordon Chalmers 在澳大利亞賽鴿雜誌（Australian Racing Pigeon Journal）也發表了關於副粘病毒感染對禽鳥類影響的研究成果，結論同樣是：**“信鴿不會攜帶禽流感病毒，不是易感動物，也不會傳染給其他家禽”**（詳見附件三：“Moving the Zoo” - the Implications for Racing Pigeon Fanciers），簡單的說，鴿子不像雞那樣會發生禽流感並傳播，鴿子也不像鴨和鵝那樣會攜帶禽流感病毒，會傳染給其他禽鳥（當然鴿子除外）而一般不會發病。事實上，從 1997 年香港發生禽流感，香港賽鴿會所養賽鴿從未因此受影響而感染發病，也未發生其他重大疫病和非正常死亡情況（詳見附件四：《香港賽鴿進境國內事宜》香港漁護署函 AFGRLSK26/3 號）。這正是香港賽鴿未受香港禽流感影響的事實。也是鴿子不感染不傳播禽流感的明證。我會希望與會的各位議員和官員，以這些科學的理據和

真實的情況爲依據，進行科學決策。從公眾衛生等因素考慮，我會仍堅定歡迎並擁護政府立例規管，只希望規管發牌應有科學、合理、恰切的理據及名義，而牌照費更不應收取高額度及以之爲制約賽鴿飼養者之出發點。

我會不準備在會上做口頭陳述，但希望此函及附件發給參加會議成員、列席會議官員、立法會全體議員。希望借此能說服諸位議員並得到應該得到的合理的實質性的支持。順以此函一併答復馬朱雪履女士，不再另函。

專此函達。

香港賽鴿會會長

許遵平

二〇〇六年九月八日

附件一：《香港賽鴿會註冊會員登記鴿棚管理手冊》)（式樣稿）

附件二：Susceptibility of pigeons to avian influenza

附件三：“Moving the Zoo” – the Implications for Racing Pigeon Fanciers

附件四：《香港賽鴿進境國內事宜》香港漁護署函 AFGRLSK26/3 號

附件一

香港赛鸽会注册会员登记鸽棚

管理手册

香港赛鸽会印制

2000 年 1 月

说　明

一、为加强对香港赛鸽会注册会员鸽棚的管理，根据中国检验检疫部门对进入中国大陆放飞赛鸽的检疫要求，凡注册会员所饲养赛鸽要求进入中国大陆放飞者，其鸽棚均由鸽会登记在案。应按时、如实填妥本管理手册，并接受香港赛鸽会的管理。

二、本管理手册所填报的资料不涉及会员的隐私和商业秘密，因而不违背香港特别行政区有关个人隐私的条例。当中国检验检疫部门检疫需要检查核对相关鸽棚的检疫资料时，注册会员应予配合，鸽会提供协助。

三、本管理手册相关资料分别由注册会员及鸽会竞赛组分别填写，本管理手册一式二份，相关资料填妥后一份由注册会员保存、一份交由鸽会竞赛组保管。每年春、秋两季赛鸽参与竞赛训练和竞翔比赛前，分别由注册会员及鸽会竞赛组填妥当季的相关资料。

四、管理手册记录鸽棚资料，每赛鸽填写的相关资料以及竞赛组填写的竞翔结果名次均为登记鸽棚的个人资料，赛鸽会有责任为注册会员保密，除赛鸽会董事和竞赛组同事外，任何人不得接触查阅不属于本人或本鸽棚的资料，能够接触这些资料的赛鸽会董事或竞赛组同仁，不得把他人资料涉露给第三者。

五、本管理手册按中国检验检疫部门要求自 2000 年春季竞赛训练和竞翔比赛期间启用，注册会员凡有意参加中国大陆训练和比赛者，请抓紧时间填报。其中第一批填报的鸽棚登记时间统一确定为 2000 年 1 月，以备早日向中国检验检疫部门申请检疫许可。其余的，鸽棚登记时间按填报并获鸽会核定予以登记的时间为准。

鸽棚基本情况（会员填写）

会员姓名		鸽棚登记编号	
鸽棚所在地			
鸽棚面积	尺^2	饲养总数	
鸽棚四周环境及有无饲养禽类			

_____年饲养情况及免疫情况

（鸽会检查后填写）

种鸽饲养情况	编号	种鸽名称	♂/♀	年龄	原产地	疾病发生情况
	当年计划生产数		羽	当年可参加竞翔数		
	外鸽棚引入数		羽	每年计划竞翔总数		
免疫注射情况						

_____年饲养情况及免疫情况

（鸽会检查后填写）

种鸽饲养情况	编号	种鸽名称	♂/♀	年龄	原产地	疾病发生情况
	当年计划生产数		羽	当年可参加竞翔数		
	外鸽棚引入数		羽	每年计划竞翔总数		
免疫注射情况						

_____年饲养情况及免疫情况

（鸽会检查后填写）

种鸽饲养情况	编号	种鸽名称	♂/♀	年龄	原产地	疾病发生情况
	当年计划生产数		羽	当年可参加竞翔数		
	外鸽棚引入数		羽	每年计划竞翔总数		
免疫注射情况						

_____年饲养情况及免疫情况

（鸽会检查后填写）

种鸽饲养情况	编号	种鸽名称	♂/♀	年龄	原产地	疾病发生情况
	当年计划生产数		羽	当年可参加竞翔数		
	外鸽棚引入数		羽	每年计划竞翔总数		
免疫注射情况						

_____年春、秋季训练竞翔赛鸽情况及竞翔结果记录

序号	品名	年龄	脚环号码	健康状况	抽检项目及结果	公里训练/竞翔	平均分速	归巢/名次

______年春、秋季训练竞翔赛鸽情况及竞翔结果记录

序号	品名	年龄	脚环号码	健康状况	抽检项目及结果	公里训练/竞翔	平均分速	归巢/名次

______年春、秋季训练竞翔赛鸽情况及竞翔结果记录

序号	品名	年龄	脚环号码	健康状况	抽检项目及结果	公里训练/竞翔	平均分速	归巢/名次

_____年春、秋季训练竞翔赛鸽情况及竞翔结果记录

序号	品名	年龄	脚环号码	健康状况	抽检项目及结果	公里训练/竞翔	平均分速	归巢/名次

_____年春、秋季训练竞翔赛鸽情况及竞翔结果记录

序号	品名	年龄	脚环号码	健康状况	抽检项目及结果	公里训练/竞翔	平均分速	归巢/名次

_____年春、秋季训练竞翔赛鸽情况及竞翔结果记录

序 号	品 名	年龄	脚环号码	健康状况	抽检项目及结果	公里训练/竞翔	平均分速	归巢/名次

附件二

Avian Dis 1996 Jul-Sep;40(3):600-4

Susceptibility of pigeons to avian influenza.

Panigrahy B Senne DA, Pedersen JC, Shafer AL, Pearson JE.

National Veterinary Services Laboratories, U.S. Department of Agriculture, Ames iowa 50010, USA.

Susceptibility to infection with avian influenza virus (AIV) was studied in pigeons inoculated via oculonasal (Experiment 1) or intravenous (Experiment 2) route.
Chickens were included as susceptible hosts in both experiments. Two subtypes each of the highly pathogenic AIV (HPAIV; HP CK/PA H5N2 and HP CK/Australia H7N7) and non-pathogenic AIV (NPAIV; NP CK~PA H5N2 and NP emu/TX H7N1) at a dose of 10(5) embryo infective dose per bird were used as inoculum. The pigeons inoculated with HP CK/PA H5N2 or HPCK/Australia H7N7 remained apparently healthy throughout the 21-day observation period, did not shed viruses on 3, 7, 14, and21 days postinoculation (DPI), and had no demonstrable levels of antibodies on 21 DPI. On the other hand, 9 of 12 chickens inoculated with the HPAIV died of highly pathogenic avian influenza; the viruses were recovered from their respiratory and intestinal tissues, and the surviving chickens had antibodies to AIV.
Regarding responses of pigeons to inoculation with NP CK/PA H5N2 or NP emu/TX H7N 1, the pigeons remained clinically healthy throughout the 21-day observation period and did not have detectable levels of antibodies on 21 DPI; only one pigeon yielded the NP emu/TX H7N 1 on 3 DPI. The virus was isolated from a tracheal swab and was believed to be the residual inoculum virus. Based on the responses of pigeons to NPAIVand HPAIV, **it was concluded that the pigeons were resistant or minimally susceptible to infection with HPAIV or NPAIV.**

PMID: 8883790 [PubMed - indexed for MEDLINE]

附件三

"Moving the Zoo" - the Implications for Racing Pigeon Fanciers

Written by Gordon Chalmers

Tuesday, 01 June 2004

A number of years ago, a friend who is a professor of biology at a large university in Canada, began to discuss the concept of "moving the zoo". What does this mean? Well, the idea is this. Whenever birds or animals, including human beings, are moved from one area of the country -- or the world -- to another area, they take with them a certain amount of biological baggage. This biological baggage can be likened very much to a zoo, because of the variety of biological creatures that exist within all living individuals. Thus, these individuals unwittingly carry with them, a number of biological agents, in effect, their own zoo, including various types of parasites, bacteria, viruses, molds, etc. -- whatever they happen to harbor in their bodies at the time.

Looking specifically at racing pigeons, one can see that whenever birds are imported from foreign countries, or if they are transferred from one side of the country to another, or even within one local area, or if birds from a number of fanciers are mixed together for racing, these birds carry with them, a certain complement of this varied biological baggage. So, for example, if birds have feather lice or mites, it is an easy matter for these external parasites to transfer to other similarly affected or unaffected birds in the same shipment, or to other birds at their final destination.

Many biological agents that make up this travelling zoo are innocuous, and their transfer to other birds is of very little consequence. The mixing of a number of similar organisms with different genetic backgrounds is a biological mechanism for the sharing of genetic material within the same species. Some of the newly transferred genetic material is beneficial to the survival of the species involved. Other genetic material that is transferred by the mixing of similar organisms of different origins may not be beneficial to these organisms.

However, as we all know from sad, and sometimes devastating experiences, the travelling zoo contains passengers that we wish could have stayed home. One of the best and most recent examples of a passenger that we would have preferred to avoid is the paramyxovirus (PMV-1). This virus, a very close relative of the virus of Newcastle Disease of chickens, surfaced first in the Middle East, moved through countries of the Mediterranean, spread into Europe and Britain, and finally into North America. Because viruses usually require living tissue in which to survive, this virus was transferred to susceptible pigeons in the tissues (likely the intestines and even the nasal tissues) of pigeons that were probably incubating the disease, ie, birds that were infected but not yet showing signs of the disease. The result was a massive outbreak of disease whenever infected pigeons were introduced to lofts of susceptible birds.

It is important to remember that when pigeons or other birds and animals are shipped anywhere, they undergo a period of considerable stress at this time. The brain sends messages of alarm to various tissues through the pituitary gland located on the underside of the brain. One key set of tissues to receive these alarmist signals is the adrenal glands located at the forward end of the kidneys. In turn, the adrenal glands send out chemical messengers in the form of steroids known as corticosteroids. One result of the action of these corticosteroids is the suppression of the immune (or defence) system. In this way, much of this defensive system is placed on lowered alert. When body defences are down, disease can strike.

Viruses that are hidden in body cells, are no longer controlled by a patrolling system of defensive cells and fluids, and begin to multiply. They escape from cells, and invade other cells. Millions of new viral particles are produced in this way, and many are shed in droppings, nasal secretions, etc., and by these means, are readily available to be picked up by exposed, susceptible birds.

More commonly than we realize, herpesvirus is a silent passenger among not only imported pigeons, but also among pigeons resident in North America. During periods of stress, it too begins to multiply in the tissues of infected birds. Like other viruses, herpesvirus uses the tissues of the bird as factories for the production of more and more viral particles. In effect, the living bird becomes a large factory, churning out viral particles in the millions. It will kill a few birds in a flock until general resistance builds to a level that protects the remaining birds. Like herpesviral infections in other species, including humans, even though most individuals become solidly resistant, a few will remain as permanent carriers, the virus safely hidden in tissues of the body until the next major period of stress allows them to begin to multiply and to be shed in droppings and other body fluids.

A relative newcomer to the racing pigeon scene is the agent called circovirus. This virus has only recently been identified in pigeons on this continent. Like the AIDS virus in humans, this virus appears to destroy important cells of the immune system, leaving the birds susceptible to a wide variety of other diseases. To illustrate this important point, case studies of this disease indicated that pigeons infected by circoviruses had a variety of other infections as well -- for example, those caused by Chlamydia sp. (the cause of a condition called variously, chlamydiosis, or psittacosis when it occurs in psittacine birds, and ornithosis when it occurs in other classes of birds, etc.), canker organisms, adenovirus, paramyxovirus, poxvirus, herpesvirus, molds, as well as infections caused by E. coli and Salmonella (paratyphoid) species of bacteria. This wide range of secondary and tertiary infections in pigeons known to be infected by circovirus points up the highly important role of this viral agent firstly in destroying defensive cells in the body, and secondly, in allowing a wide variety of other disease-producing agents to invade the tissues.

Luckily for all of us, the virus of Avian Influenza -- including some of the very deadliest strains -- which is common in waterfowl and other wild birds, just does not cause disease in pigeons, nor are pigeons implicated in the spread of this disease which is so important to our poultry industries. Scientific evidence is very clear on this point. This component of the biological zoo seems to find pigeons inhospitable, and it seems likely

that, even in the face of bans on the movement of pigeons during an outbreak of the disease in domestic poultry, pigeons are highly unlikely to be implicated in the spread and maintenance of Avian Influenza.

Other agents involved in disease in pigeons operate generally in a similar fashion, attacking and invading during periods of stress. The organism that causes canker in pigeons is a small, teardrop-shaped parasite called Trichomonas gallinae that lives on the surface of the mouth, gullet and crop of pigeons. Under conditions of stress, such as the period following weaning in youngsters, or racing in old birds, etc., this organism can become increasingly active, and begins to multiply and to invade these surface tissues. Some of these organisms will also invade the liver where they produce severe disease that can kill, especially youngsters, but also old birds as well.

The organism that causes canker is interesting because it exists as a number of strains that range widely in their ability to produce disease. Some are completely innocent and produce only mild disease, or no disease at all in pigeons. At the other end of the spectrum, there are other strains in which the transfer of only a few organisms from one pigeon to another results in the production of severe, fatal disease. Experimental work many years ago by a man named Stabler showed as well that if the mouth, throat, gullet and crop of pigeons were colonized by a mild strain of the organism, this mild strain was remarkably effective in protecting against the introduction of a potent, disease-producing strain that would ordinarily kill.

On the subject of the canker organism, it seems that a number of the strains currently operating in Europe have become increasingly resistant to the usual drugs used in treatment.

This of course, increases the potential that strains of the organism that accompany imported pigeons soon or late will also gain a foothold in other parts of the world and may cause us untold grief in future. If we don't have useful drugs to combat this organism, should we consider a fall-back position of introducing innocuous strains into our birds -- as Stabler did so long ago -- to try to protect them against the new powerful organisms from other countries?

Moving the zoo becomes an important concept for any livestock operation that exports or imports animals or birds, whether nationally or internationally, and is no less important for us as pigeon fanciers. When we consider the great number of biological agents that we can introduce to our lofts through importations from foreign countries, through transferring birds locally and throughout the country, and through racing, we can see how relatively easy it is to move any number of biological zoos right into our back yards.

These zoos are only a phone call, a fax, Email, or a letter away from us.

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