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**Submission to Special Meeting of Legislative Council Panel on Food Safety and Environmental Hygiene, Tuesday 16 May 2017 on the outcome of the consultancy study on the way forward for live poultry trade in Hong Kong**

I would like to make the following statements in relation to the consultancy report produced by BMT Asia Pacific.

1. The BMT report provides a good general overview of the poultry food system in Hong Kong (section 2), and has generated valuable and largely qualitative background information. To be able to take the data quality into account, it is important to attribute the source of all information, i.e. whether it is from a particular scientific paper, a published or unpublished report or personal communication, or any other source.
2. The BMT report can now be used as the basis for a scientific risk assessment based on, for example, the OIE Risk Analysis framework with precisely defined risk questions that have been agreed by the relevant stakeholders. The European Food Safety Authority published a scientific opinion on risk assessment terminology (<http://onlinelibrary.wiley.com/doi/10.2903/j.efsa.2012.2664/full>). This document provides a useful overview of available risk assessment methods. In animal health, the OIE risk analysis framework has been widely accepted and can greatly facilitate communication among risk assessors, risk managers and other stakeholders.
3. The scientific risk assessment will provide a transparent and scientifically sound basis for deciding on the appropriate risk management measures for H7N9 LPAI and HPAI viruses, taking advantage of the background information provided by the BMT report. One of the risk questions in this risk assessment could be estimating the likelihood of H7N9 introduction to Hong Kong via different possible risk pathways and the associated uncertainties. This scientific information together with other factors (stakeholder preferences, economic and cultural factors) can then be used to make an informed decision about the most appropriate risk management strategy. The risk management options would include poultry vaccination, increased surveillance as well as any other potential risk mitigation strategy. Without having performed a scientific risk assessment, it would be speculative to come up with a risk estimate.
4. The results from the telephone survey presented in the BMT report (section 4) cannot be interpreted without providing information about the characteristics of the 1000 respondents relative to those of Hong Kong's population. Therefore, the figure of 47% expressing a preference for live chickens should not be used to make a generalised statement about the Hong Kong population's views. It would also be helpful to see the exact wording of each question.
5. The stakeholder views in section 5 provide useful insights. However, it is difficult to interpret this information since it is unclear whether biases might have been introduced by the choice of participants in the discussions. It would be useful to provide details on the professional expertise of each expert, and a summary of what the 55 trade stakeholders are representing in the industry. The information in relation to the views of

the general public in this section needs to be interpreted very carefully, given that it is unclear how the population sample of survey interviewees relates to Hong Kong's population. It is almost certain that the sample is biased, and it is necessary to understand the extent and direction of the bias to allow a meaningful interpretation of the results.

6. Sections 6 and 7 of the report present useful structured overviews of the evidence and opinions but without a formal scientific risk assessment, so they need to be interpreted with extreme caution. Based on my experience from working in scientific advisory roles with policy makers in the United Kingdom, at the European Union and United Nations level, and with several national governments for almost 30 years, I would advise that a study such as what is presented in the BMT report can make recommendations, but should not make implied decisions about acceptability of risk, through a statement like "it is concluded that with existing effective safeguarding measures, live poultry trade in Hong Kong should be maintained". Instead, it is the responsibility of the government officials together with other political representatives to decide on behalf of Hong Kong's residents whether a particular level of avian influenza risk (estimated through a scientifically sound risk assessment) is acceptable or not, taking into account many factors such as the probability of introduction of virus to Hong Kong's poultry farms, probability of humans being exposed to and infected with virus through live poultry in Hong Kong, desirability of continued availability of live and freshly slaughtered chicken meat in Hong Kong and the cost of surveillance. Based on that conclusion, appropriate risk management can be adopted in order to achieve an acceptable level of risk.
7. As indicated in the findings from this report, AFCD is to be commended for having established an effective risk management strategy for AI in Hong Kong, despite the continuing presence of infection in the Mainland China. It has been very effective in reducing the risk of exposure to the AI viruses in Hong Kong to a very, very low level. The risk of human infections cannot be completely reduced to zero even if live poultry sales are limited or eliminated in Hong Kong, because of the ongoing presence of AI viruses in the Mainland.