



消費者委員會 CONSUMER COUNCIL  
香港 · HONG KONG

國際消費者協會  
執事及理事會成員  
EXECUTIVE AND  
COUNCIL MEMBER OF  
CONSUMERS  
INTERNATIONAL

來函編號 YOUR REF.

本函編號 OUR REF.

3 June 2017

Food Branch  
Food and Health Bureau  
17/F, East Wing, Central Government Offices  
2 Tim Mei Avenue  
Tamar, Hong Kong

Dear Sir/Madam,

**Re: Way Forward of Live Poultry Trade in Hong Kong  
Public Consultation**

The captioned public consultation on Way forward of Live Poultry Trade in Hong Kong refers.

Please find attached views from the Consumer Council for consideration of the Bureau.

Should you have any queries on the issue, please feel free to contact Ms Vera Tam, Chief Planning and Trade Practices Officer at

Yours sincerely,

Gilly WONG

Chief Executive  
Consumer Council

## **Consumer Council**

### **Submission to the Food and Health Bureau Public Consultation on Way Forward of Live Poultry Trade in Hong Kong**

1. The Consumer Council (the Council) is pleased to submit its views concerning the Food and Health Bureau's Consultancy Report on the Study on the Way Forward of Live Poultry Trade in Hong Kong.

#### **Response on the Recommendations**

2. By taking into account of the current Avian Influenza (AI) risk level and the preference of the public for live poultry as stated in the Consultancy Report, the Council has no objection to the recommendations of maintaining the status quo for the live poultry trade in Hong Kong, i.e. to continue the sale of live poultry at retail level and not to ban the import of live poultry.

3. For the purpose of protecting public health, the Council considers that the recommendations of strengthening existing safeguarding measures along the supply chain are necessary. Measures, like introducing additional vaccination in local chicken farms against the new challenge posed by H7N9 AI virus, conducting pre-sale AI test by Polymerase Chain Reaction method on chickens for each marketable batch before delivery to the wholesale market, upgrading retail outlets to increase physical barriers for human to get in touch with live poultry, and relocating the wholesale market at Cheung Sha Wan to a less populated suburban area, should be implemented with no delay.

4. The Council considers consumer health can never be compromised. Whatever the operation mode of live poultry trade that the Government is going to adopt, the Council considers that the prime consideration is on the sufficiency and effectiveness of safeguarding measures in protecting the public health. The effect of imposing improvement measures against the competition on the supply of the live poultry should also be monitored and reviewed closely.

#### **Considerations from the perspective of antimicrobial resistance control**

5. Although the current Consultancy Report's recommendations are derived from the perspective of AI control for safeguarding public health, the Council strongly believes that the Government should include the perspective of antimicrobial resistance (AMR) control in governing the future of live poultry trade, in view of its global threat and possible misuse and overuse of antibiotics in local market. For instance, how the spread of AMR might be minimized by adopting different operation mode in the live poultry trade i.e. husbandry, transportation, sale and incident

reporting etc. and what safeguarding measures should be imposed should any operation mode is being adopted.

6. According to a local study<sup>1</sup>, 59% of chicken being released for sale at wet markets was carrying extended-spectrum beta-lactamase (ESBL) producing *E. coli* (a kind of antibiotic resistant bacteria). A test of the Council published in 2016<sup>2</sup> also found that 62 out of 100 chicken samples contained ESBL producing bacteria, in which 92% (22 out of 24 samples) of live chicken freshly slaughtered on site contained such bacteria.

7. With regard to the trend of human infections of antibiotic resistant bacteria, community-associated methicillin-resistant *Staphylococcus aureus* infection cases have been on the rise since the statistics first compiled by the Department of Health in 2007. In 2016, there were totally 1,148 cases comparing to 1,047 cases in 2015 and 995 cases in 2014, a year-over-year growth of 5% to 10% in the past three years.

8. Currently, there is no public information available on the use of antibiotics in local farming. From time to time, there were reported sporadic cases of forbidden antibiotics used by local farms, though the animals concerned were not chicken. Announced by the Centre for Food Safety in January 2017 and November 2015, the urine samples taken from a batch of locally produced pigs contained chloramphenicol, an antibiotic not permitted in food animals.

9. Since farm animals and the food chain is one of the major sources of the spread of AMR, it is important that the misuse and overuse of antibiotics in farm animals be controlled and the spread of resistant bacteria through the food chain be minimised. Should the Government decides to maintain status quo of live poultry trade, the Council opines that efforts on the control of AMR should be scaled up together with that of AI. This might include the following measures in terms of the preventive, surveillance and education aspects:

#### *Preventive measures*

- Improve local poultry farm biosecurity, hygiene and animal vaccination targeting for minimising bacterial infection;
- Optimise the use of antimicrobial medicines in poultry health, which might include (i) the ban of antibiotics for growth promotion and disease prevention purposes; (ii) mandatory requirement of veterinary prescription for use of antibiotics for disease treatment and control purposes; and (iii) the review of the regulation of critically important

<sup>1</sup> Ho PL et al. Journal of Antimicrobial Chemotherapy 2011; issue 66: pp 765-768.

<sup>2</sup> CHOICE magazine 2016; issue 482: pp 4-16.

antimicrobials and highest priority critically important antimicrobials as classified by WHO;

- Review the mechanism applied in the routine issuance of antibiotic permit to local farm under Cap. 137 Antibiotics Ordinance; and
- Improve wholesale poultry market and live poultry outlet biosecurity and hygiene; and enhance separation

#### *Surveillance measures*

- Surveillance of antimicrobial susceptibility of bacterial pathogens at local farm poultry, wholesale poultry market, live poultry outlet and live poultry trade practitioner levels; and
- Surveillance of antimicrobial use in local farm poultry

#### *Education*

- Strengthen live poultry trade practitioners and community awareness and understanding of AMR and good hygiene practices

#### **Conclusion**

10. As the recommendations on the way forward in the Consultancy Report are made on the basis of the current AI risk level, if AI risk level increases significantly in the future, the Council shares with the Consultancy view that the Government should reassess the necessity of changing mode of operation in the live poultry trade.

**Consumer Council**  
**June 2017**