

Attachment B

SUMMARY OF STAKEHOLDERS' COMMENTS ON THE DRAFT REVIEW PAPER WITH RESPONSES BY ANIMAL BIOSECURITY

Comments on the review

We...consider the review to be thorough and accurate

...the proposed risk management measures...are satisfactory

...have no objection to the thrust of the policy proposals...[Animal Biosecurity] should be congratulated for comparatively thorough evaluation of the potential risk or otherwise of these proposals and for consulting fully with industry

...the arrangements are sensible, practical and provide appropriate risk management.

Comments on interim ports:

While Sharjah has excellent facilities, it has little curtilage and no air-conditioned or insect proof cargo area...It would seem wise to exclude Sharjah [as a port where horses can be unloaded].

United Arab Emirates authorities have advised Animal Biosecurity that the airport at Sharjah is surrounded by desert on three sides and by a road and Palace grounds on the fourth. The cargo facility is at least 2 km from the desert. There are no animals within 3 km of the cargo area. Vector proof quarantine stables are 8 km away. Animals transiting Sharjah are held in non air-conditioned hangars for short periods if delayed. As there are no air-conditioned, insect proof stables at the airport, Animal Biosecurity has amended the transport requirements such that no horses are permitted to be unloaded at Sharjah airport. Sharjah is approved as a transit stop only. This requirement will be reviewed in light of outcomes from the surra import risk analysis that Animal Biosecurity is currently undertaking.

[Singapore authorities have advised that] currently there are limited insect proof facilities in Singapore. [However, in the unlikely circumstance that] insect proof stables are not available...horses can be held in isolated stables...and can be treated with long acting insect repellent during the entire period.

Animal Biosecurity recognises that, on rare occasions, horses may be delayed in Singapore and insect proof facilities may not be immediately available. Isolated stables, further repellent treatment and use of netting can all be used to mitigate any additional risk. This will be dealt with on a case-by-case basis, if it occurs.

[There are concerns] if other horses ...transit at the same airport at the same time.

IATA Live Animal Regulations specify that:

“a shipment from one point of origin must not be joined by a shipment of live animals from a different point of origin unless the importing country is in agreement. This is most important when transshipping takes place”.

Animal Biosecurity has also amended the requirements to this effect.

Comments on diseases of concern

...the critical issues involve insect borne diseases ...like JE RVF and AHS...Routine vaccination against JE would be a wise precaution but it appears not all EU Member States allow it.

JE is not a major issue...as horses can now be vaccinated against the disease...however it may be a disaster for the horse and its connections.

There is an opportunity for some horses, which travel frequently, to be vaccinated for JE outside the EU. Horses such as the shuttle stallions could be vaccinated each year on export from Australia. The UK Department for Environment, Food and Rural Affairs has advised that arrangements may be made to vaccinate the limited number of horses exported from the UK, transiting in Asian ports. Where horses have not been vaccinated, alternative methods have been specified to mitigate the risk of JE.

[Should we have regard for] other vector borne diseases of horses ...such as Getah and equine encephalosis?

While Getah virus is widespread in Asia, its presence in Hong Kong and Singapore has not been confirmed for quite some time. Measures to reduce risk of JE will also mitigate any risk of other mosquito borne diseases such as Getah virus infection.

Equine encephalosis is found in southern Africa. If consignments were diverted to the African continent then all additional risks, such as AHS and equine encephalosis, would be considered before the fate of the consignment was determined.

The movement of RVF into Saudi Arabia is a concern and warrants monitoring by AQIS/BA because...horses can be sub-clinically affected. A formal...process is needed.

Animal Biosecurity will monitor movement of Rift Valley through the OIE and through the Australian embassies and posts in the region.

Comments about audit of consignment:

I support the recommendations that audits...are undertaken at least once every two years.

Audits should be conducted at least once yearly in my view, certainly for the first two to three years and ...the required frequency of audits should be clearly documented.

We feel that ongoing audits should be assessed on...performance rather than at least once every two years.

[Possibly AQIS veterinarians] ... should accompany all flights involving unloading at stopovers.

Animal Biosecurity recommends that audit should be no more than two years apart; however, it recognises that initially, particularly in the case of less experienced operators or where discrepancies are found, audits may need to be more frequent. Operators may be required enter into a Compliance Agreement with AQIS.

Animal Biosecurity considers that, at transit ports where horses are unloaded, there are appropriate facilities and sufficient official supervision such that AQIS/Animal Biosecurity veterinary escort is not routinely required. Animal Biosecurity has specified in the conditions that consignments may be accompanied by an official veterinarian at the importer's expense.