

file no: 98/3337

11 August 2000

ANIMAL QUARANTINE POLICY MEMORANDUM 2000/37

IMPORT RISK ANALYSIS: PINNIPEDS

DECISION ON NEW CONDITIONS

This Animal Quarantine Policy Memorandum (AQPM) provides the final report of the import risk analyses (IRA) of pinnipeds. Stakeholders who wish to appeal against the process followed should advise the Director of Quarantine by 11 September 2000.

According to the process set out in AQIS's *Import Risk Analysis Process Handbook*, the Executive Director of AQIS has considered the final report on pinnipeds and agreed to the conditions included in the report (Attachment A).

The draft report was circulated in January 2000 under AQPM 2000/18. There were eight responses. Comments supported the findings of the IRA and proposed quarantine requirements and all responses were considered in finalising the IRA. A summary of written comments received and AQIS's response is at Attachment B.

The final import conditions do not differ greatly from the proposed conditions. There is a tightening of the requirements for two disease agents, San Miguel sea lion virus and phocine distemper virus, as discussed below. The final conditions allow for the importation of pinnipeds.

The quarantine measures in the draft report for phocine distemper were queried in relation to the maximum period of virus excretion. AQIS agrees the serious nature of this disease warrants a tightening of quarantine measures for phocine distemper so that the period of pre-export quarantine comfortably covers the known incubation and infective periods. The recommended pre-export quarantine requirement for phocine distemper has been increased from two to three months. In practice this will not affect preparation for export because animals will be serving four months in pre-export quarantine for tuberculosis.

One respondent queried the requirement for San Miguel sea lion virus (SMSV) that only the institution of export be free from the disease for two years, suggesting that pinnipeds be sourced only from regions that have not reported the disease. Initially the disease was thought to be confined to waters off the coast of California, but is now known to be present in the

Bering Sea and in seals off the coast of Cornwall (UK). Since the greater part of the world has no formal surveillance or reporting system for this disease agent, unreported disease may occur in some regions believed to be free. AQIS does not consider a requirement for regional freedom meaningful. A tightening of the requirements for disease freedom for exporting institutions has been introduced instead. In addition to requiring the exporting institution be free from SMSV for two years, AQIS now requires that no wild-caught pinnipeds be brought into the premises during that period.

It should be reiterated, that it was considered highly unlikely that SMSV, if it were introduced to a zoo, would pass directly or indirectly into the pig feed chain in Australia.

One respondent suggested the inclusion of a pre-export treatment for trematodes. The literature search, whilst discovering a number of small trematodes that affect pinnipeds, did not indicate that any were associated with significant pathology. Further questioning of Australian zoo staff indicates that trematodes do not normally warrant treatment in pinnipeds. In this respect the protocol has not been changed.

Since the draft IRA report for the importation of pinnipeds was released, the *Quarantine Act* (1908) has been amended with regard to zoos and approved premises. This will make little practical difference to the conditions under which imported pinnipeds will remain in Australia. Under the amended Section 46A of the *Quarantine Act* (1908), imported animals will normally be required to undergo a period of post-arrival quarantine in a premises approved by AQIS. At the end of the post-arrival quarantine period, zoo animals will normally be released from quarantine under quarantine surveillance (under sub-section 52 (5) of the Act). While under quarantine surveillance they will be subject to prescribed conditions which may include permanent confinement in a zoo or institution approved as an “approved institution” or an “approved zoological organization” under the Wildlife Protection (Regulation of Exports & Imports) Act 1982. They will be kept under quarantine surveillance for as long as considered necessary.

Next steps

This AQPM advises the final conditions endorsed by the Executive Director of AQIS.

The IRA was conducted in accordance with the routine process as described in the AQIS *Import Risk Analysis Process Handbook*, which provides an opportunity for appeal to the Director of Quarantine. A stakeholder who considers that the process set out in the *Handbook* was not properly followed or that AQIS failed to consider a significant body of relevant scientific or technical information may appeal to the Director of Quarantine. Appeals on other grounds can not be considered.

Information on appeals is made public. Appeals should be sent to:

Mr Michael Taylor
Director of Quarantine
Department of Agriculture, Fisheries and Forestry - Australia
GPO Box 858
CANBERRA ACT 2601

Appeals should be received by close of business on 11 September 2000. If there are no appeals, the attached conditions will be adopted on 18 September 2000. AQIS will issue a

further AQPM advising adoption or, alternatively, that an appeal has been received. All inquiries should be directed to the officers whose contact details appear below.

Confidentiality

Respondents are advised that, subject to the *Freedom of Information Act 1982* and the *Privacy Act 1982*, all submissions received in response to Animal Quarantine Policy Memoranda will be publicly available and may be listed or referred to in any papers or reports prepared on the subject matter of the Memoranda.

The Commonwealth reserves the right to reveal the identity of a respondent unless a request for anonymity accompanies the submission. Where a request for anonymity does not accompany the submission the respondent will be taken to have consented to the disclosure of his or her identity for the purposes of Information Privacy Principle 11 of the Privacy Act.

The contents of the submission will not be treated as confidential unless they are marked 'confidential' and they are capable of being classified as such in accordance with the Freedom of Information Act.

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ATTACHMENT B.

Summary of responses

| | Main comments | Action/explanation |
|---|---|---|
| 1 | <p>Section 3.2.7 - Comments on the correct classification of the seal isolate of the organism within <i>M. tuberculosis</i> complex.....</p> <p>Correction of terminology re PCR.....</p> <p>TB has been found in sea lions in zoos in France and UK..... (References supplied)</p> | <p>Text corrected accordingly.</p> <p>As above</p> <p>As above</p> |
| 2 | <p>Re <i>Trichinella</i>, asked if intestinal cycle exists.....</p> <p>Reported results of new work confirming presence of TB in free ranging Australia fur seals.....</p> <p>Vesicular lesions have been observed in elephant seals at Macquarie Is. No agent isolated, not followed up.....</p> <p>Commented on the difficulties in interpretation of TB tests in the face of limited validation of same.....</p> <p>Disagreed that anaesthesia is a risk for otariid seals, but that this is still true for phocid seals. Disagreed that logistical difficulties should be a barrier to testing.....</p> <p>Supported a conservative approach to quarantine.....</p> | <p>Additional search of literature produced no evidence.</p> <p>None.</p> <p>Comment included in section on SMSV.</p> <p>None. (TB testing was not recommended in IRA)</p> <p>None other than to include comment.</p> |
| 3 | <p>Agreed with proposal subject to PEQ and PAQ being satisfactorily applied.....</p> | <p>None.</p> |
| 4 | <p>Supported draft. Located typos.....</p> | <p>Typos corrected.</p> |
| 5 | <p>Supported draft</p> | <p>None.</p> |
| 6 | <p>No comment.....</p> | <p>None</p> |
| 7 | <p>Re Phocine distemper, asked if carriers existed beyond the normal incubation period.....</p> <p>Suggested that institution freedom from SMSV may not be adequate. Suggested sourcing animals from regions of the world that have not reported SMSV.....</p> <p>Suggested inclusion of TB skin test, but acknowledged its limitations.....</p> | <p>Tightening of measures for PDV included and discussed in AQPM.</p> <p>Additional measures for exporting institutions included and discussed in AQPM</p> <p>None</p> |

| | Main comments | Action/explanation |
|---|--|--|
| 8 | <p>Under proposed quarantine requirements 1.3. Sought clarification on approval of countries to export live animals to Australia.....</p> <p>1.6 Queried whether testing is required or recommended.....</p> <p>1.7 Suggested standards for PEQ facilities should be presented as a requirement, not an example.....</p> <p>2.6 Suggested inclusion of anthelmintic for trematodes.....</p> <p>Attachment 2. Suggested expansion of standards for PAQ facilities to be consistent with marine and freshwater fish Q facilities</p> <p>Suggested quarantine surveillance while in Australia should include waste disposal requirements to prevent dissemination of <i>T. spiralis</i>..</p> | <p>This was adequately covered in the draft under Executive Summary and 4.1.1 and 4.1.2 of the section on Risk Management.</p> <p>Testing prior to entry to PEQ is <u>recommended</u> to avoid unnecessary quarantine of animals that are ineligible. The tests within 21 days of export are to detect all animals that are seropositive, including those that seroconvert during PEQ.</p> <p>1.7 The wording of this section is “...PEQ <i>must</i> meet AQIS standards...” The likelihood of equivalent standards being put for consideration has been pre-empted by supplying example standards as an attachment.</p> <p>No trematodes associated with significant pathology were uncovered. No action.</p> <p>Amendments (to 4.1.2(b) of the IRA and Attachment 2) appropriate to large marine mammals have been made.</p> <p>No evidence of faecal excretion of <i>Trichinellae</i> by pinnipeds. Pinniped <i>Trichinellae</i> may be another species or subspecies of <i>T. spiralis</i>. Quarantine surveillance is primarily for TB control.</p> |