



STAKEHOLDER COMMENTS AND BIOSECURITY AUSTRALIA'S RESPONSES TO BAPM 2006/28

Stakeholder comments and Biosecurity Australia's responses

Comments were received from:

Mr Mohammed Mousa Abdullah, Director, Department of Animal Wealth, Ministry of Agriculture, UAE

Mr G Barry Smyth, President, Australian Horse Industry Council Inc.

Mr Crispin Bennett, Crispin Bennett International Horse Transport Pty Ltd

Mr Andrew Harding, Chief Executive, Australian Racing Board Limited

UAE Department of Animal Wealth (DAW)

Comment: DAW sought interpretation of the requirement that horses not leave the premises during pre export quarantine (PEQ) without permission of the supervising Official Veterinarian and AQIS (Operation, clause 4) with regard to emergency treatment or examination.

Biosecurity Australia's response: Departure from PEQ would invalidate the PEQ unless agreed by the Australian Quarantine and Inspection Service (AQIS).

Comment: DAW asked for interpretation of the timing requirement for equine influenza vaccinations (Certification, clause 3).

Biosecurity Australia's response: This requirement is made to optimise immunity levels to equine influenza, in the knowledge that complete immunity may not be possible, while reducing the potential for virus transmission. A certifying veterinarian should interpret whether the horse has received an adequate primary course and subsequent regular booster vaccinations, the last being within 4 months of entry into PEQ. The requirement is consistent with equine influenza vaccination conditions for the importation of horses into Australia from other countries.

Comment: DAW questioned the requirement for immature females to be sampled for contagious equine metritis (CEM) (Certification, clause 5).

Biosecurity Australia's response: This condition is consistent with conditions for CEM for horses permanently imported into Australia from other countries. Biosecurity Australia acknowledges the validity of comments made by DAW in relation to deep cervical samples for immature females. This requirement is under further consideration.

Comment: DAW queried the age requirement for vaccination for equine viral arteritis (EVA) (Certification, clause 7).

Biosecurity Australia's response: Agree that the requirement for negative antibody testing and isolation immediately prior to vaccination is adequate to assure prevention of transmission of EVA. The final conditions have been amended by removing reference to age requirements.

Mr G Barry Smyth, President, Australian Horse Industry Council Inc.

The AHIC endorsed the proposals but listed some queries raised by Committee members.

Comment: AHIC considered adoption of 50 metre separation from other equines undermined existing PEQ template conditions and suggested inclusion of 'unless otherwise agreed by AQIS' to allow dispensation from a proposed 100 metre separation (PEQ requirements).

Biosecurity Australia's response: This distance requirement is to address the risk of transmission of equine influenza. The UAE has not had a case of equine influenza since 1996 and has vaccination requirements for imported horses aimed at reducing the likelihood of virus introduction and spread. UAE authorities have assured Biosecurity Australia that quarantine facilities are more than 100 metres from other horses. Arrangements for horses travelling to exercise may mean approaches less than 100 metres, but are more than 50 metres away from the PEQ premises.

Comment: AHIC requested that provision for insect screening be included in the PEQ premises requirements.

Biosecurity Australia's response: Agreed. This requirement applies to stable accommodation and is included for clarity in the section under PEQ premises requirements (Operation, clause 2).

Comment: AHIC asked why the requirement for cleaning and disinfection is removed from premises requirements (PEQ requirements).

Biosecurity Australia's response: This requirement is included in the PEQ premises requirements (Operation, clause 2).

Comment: AHIC questioned the circumstances under which horses depart from PEQ and return (Operation, clause 6).

Biosecurity Australia's response: Conditions for departure from the PEQ are included at clause 4, (Operation) and clause 6, (Certification). DAW has also asked for interpretation with respect to emergency movement (see above).

Comment: AHIC commented that 'reliance on "stringent vaccine requirements"... would not prevent the introduction of equine influenza into the UAE' and asked for confirmation of 6 days post-arrival quarantine (PAQ) for horses entering the UAE (Certification, clause 3).

Biosecurity Australia's response: Horses imported into the UAE spend a minimum of 6 days in PAQ on entry and UAE authorities ensure vaccination requirements for both entry and resident horses are adhered to. Biosecurity Australia considers the PEQ of 21 days and PAQ of 14 days appropriate to prevent the introduction of equine influenza into Australia with the permanent importation of horses from the UAE.

Comment: AHIC suggested that rabies and West Nile virus be added to certification of disease freedom for premises of residency (Certification, clause 2).

Biosecurity Australia's response: West Nile virus is maintained in a bird-mosquito cycle. Horses develop short lived viraemias of low titre, not capable of infecting vector mosquitoes, and will undergo 21 days PEQ in vector protected conditions. Accordingly, WNV has not been included in the certification requirements.

Rabies transmission by horses is rare in endemic regions and such transmission has never been reported from the UAE. However at AHIC suggestion certification of premises freedom for rabies has been included in these conditions.

Comment: AHIC considered the residence requirements for the CEM requirements (Certification, clause 4) inappropriate. Perceived relaxation of testing requirements (Certification, clause 5) was also questioned.

Biosecurity Australia's response: Agreed. Clause 4 has been reviewed. CEM certification has been reworded. Biosecurity Australia does not wish to pre-empt the outcome of a possible review of CEM conditions and has reinstated the requirement for three samples for CEM certification in clause 5. For clarification, the requirement for equine herpesvirus certification has been removed from this clause but remains in clause 2.

Comment: AHIC asked if it can be assumed that any exercise sessions will only occur within the PEQ premises (Certification, clause 6).

Biosecurity Australia's response: The intention of this clause is to allow competition horses to exercise separately under veterinary supervision from other horses using the same facilities. Biosecurity Australia acknowledges the importance of horses having training access to exercise facilities.

Comment: AHIC questioned age requirements for EVA vaccination (Certification, clause 7).

Biosecurity Australia's response: This issue has been addressed above in answer to DAW comments and the clause has been amended.

Comment: AHIC commented on when horses were required to be examined for ticks, and whether this should be conducted by the Official Veterinarian (Certification, clause 8).

Biosecurity Australia's response: Biosecurity Australia considers this clause adequate to ensure tick freedom of imported horses. It should not be necessary to be prescriptive of examination timing and personnel within the jurisdiction of another country's animal health authority. However, the words 'entry to' are added to this clause for clarification.

Comment: AHIC commented on timing of testing, suggesting that the required delay of ten days may lead to loss of commercial confidence if positive tests late in PEQ were to lead to transport delays. It was suggested that seroconversion would have developed earlier, allowing for testing at the beginning of PEQ (Certification, clause 8).

Biosecurity Australia's response: Biosecurity Australia assumes this comment is related to the requirement for testing for *Trypanosoma evansi*, *Theileria equi* and *Babesia caballi*, all of which are pathogens exotic to Australia. Horses could potentially be exposed to infection (ie are not under supervision or vector protection) until the day they enter PEQ and the timing of tests takes this into account - the tests available detect antibody to these pathogens and ten days is considered a minimum period for development of detectable antibody. In order to maximise the effectiveness of this risk management measure, this time period is appropriate.

Comment: AHIC questioned whether all horses in PAQ (ie horses from UAE and other countries) would be subjected to the same stable spraying and insect repellent requirements (PAQ, clause 1).

Biosecurity Australia's response: Biosecurity Australia recognises that there are risks in combined shipments in PAQ facilities. Treatment of horses from the UAE with repellents and their housing with residual insecticides is a risk management measure in addition to PEQ treatment and testing. It is directed at reducing exposure of potentially infected horses to insect vectors. The risk of transmission from a vector protected horse to an unprotected horse while in PAQ is not quantified but considered very low. The conditions have been reworded

to clarify the requirement for all horses and all occupied stalls in PAQ to be treated as required.

Comment: AHIC endorsed the inclusion of the thorough examination for ticks on entry to PAQ (PAQ, clause 2).

Biosecurity Australia's response: Noted.

Crispin Bennett International Horse Transport

Comment: supported the proposals in general but recommended that when horses were alone in PAQ they not be required to be exposed to residual insecticides and repellents (PAQ, clause 1).

Biosecurity Australia's response: the use of residual insecticides and repellents are requirements that are applied independently of whether there are other animals in PAQ. Repellent application and the use of residual insecticides are considered an appropriate risk management measure.

Mr A Harding, Australian Racing Board Ltd

Comment: Supported the proposals.

Biosecurity Australia's response: Noted.