

MAJOR ISSUES RAISED BY STAKEHOLDER IN RESPONSE TO THE DRAFT IRA PAPER

Vaccination

Stakeholder Comment: One stakeholder claimed that all US birds must be vaccinated against PMV, and therefore our requirement for birds to be unvaccinated would preclude importers from bringing birds from the US, which is one of the major sources requested by importers.

Response: *Enquiries with the Veterinary Counsellor in Washington confirmed that there is no legal requirement for all USA birds to be vaccinated. There is, therefore, no reason why importers could not obtain birds from the USA. It may require the breeding of birds for export, which are deliberately not vaccinated. The possibility that vaccinated birds may be carriers of infection means that at present we should not accept vaccinated birds. This issue highlighted the need to introduce serological testing in PEQ to ensure that vaccinated birds do not “slip through” due to movement within the source country, or between countries, prior to export to Australia.*

This was further confirmed by the recent advice from UK that all racing pigeons, which are shown or raced, must be vaccinated in the UK.

Resolved to add requirement for serological testing for paramyxovirus type 1, and avian influenza, in both PEQ and PAQ.

Country of origin

Stakeholder Comments: - There was some opposition to importation of birds from countries other than their country of origin on grounds that their true disease history may not be known; with resulting difficulty in certifying vaccination status of birds not hatched in the country of export.

One stakeholder supported country of origin changes.

Response: *See comments on vaccination of birds above. Serological testing in PEQ & PAQ will address concerns that vaccinated (or naturally immune) birds may be carriers of virus. This will allow importers to obtain birds bred outside the exporting country, while maintaining quarantine security. This will address a major concern that birds were being falsely certified as having been bred in the country of export.*

Closed flock period

Stakeholder comments: - There was some opposition to removal of 'closed flock period' leading to problems in PEQ.

Response: *Previous practice was to bring birds together in one flock, for six weeks (the closed flock period), prior to entry into PEQ. This meant that the most dangerous period (immediately after mixing birds from various sources) was not necessarily under official veterinary supervision, and therefore significant disease risks might be overlooked. By increasing the time in PEQ, and moving testing requirements to later in the PEQ period (ie at least 28 days after the commencement of PEQ), the revised conditions remove this problem, while still providing ample time for infections to be transmitted (if present) to susceptible birds before testing is undertaken.*

Chlamydiosis

Stakeholder comments: - Comments were received recommending that:

- any treatment for Chlamydia in PEQ should be completed before transport, to minimise the chance that the stress of transport will lead to excretion of organisms on arrival, with concomitant OHS risk; and
- the treatment with doxycycline should be for a minimum of 42 days; and
- questioning the wisdom of importing birds exposed in PEQ to any pathogen, or birds that require treatment.

Other comments were received suggesting that it was not appropriate to expose AQIS staff to the possibility of infection with a serious zoonotic disease, and recommending the continuation of routine treatment in PAQ.

Response: *In order to address the OH&S issues, treatment will be continued in PAQ. The aim of treatment in quarantine is to suppress shedding and protect staff and NOT to eliminate infection. Chlamydiosis is an OH&S issue, and not a quarantine concern, as the disease is common in Australia. Importers should be advised that treatment has not been long enough to eliminate infection and continuation of treatment after release is at their discretion.*

Time in PAQ

Stakeholder comments: There was a mixed response to the proposal to reduce the time spent in PAQ. One view was that the reduced time in PAQ did not allow sufficient time for seroconversion to occur in sentinel birds, prior to serological testing. This view relied on the fact that the incubation period of the disease is approximately 7 days, and that sero-conversion takes 14 days.

An opposing view supported a further reduction to 30 days, based on allowing 23 days for virus culture of cloacal swabs and 9 days for serology on sentinels. Better to have the majority of time spent overseas as may lessen the likelihood that a disease will come here.

Response: Bleeding at 21 days is ample to ensure that serological response is detected. Seroconversion takes 14-21 days after exposure, not after development of clinical signs. Sentinel birds are drenched with clarified faecal suspension on day 1 so should have seroconverted by day 21.

Pelleted feed

Stakeholder comment: One stakeholder agreed with requirement for pelleted feed; another raised concerns that if pigeons are not used to it, they will not eat.

Response: This was included by way of advice to importers only, and is not a requirement

Testing for IBDV

Stakeholder Comment: One stakeholder stated that there is no evidence to suggest that pigeons can be experimentally or naturally infected with IBD. Delete requirement for testing.

Response: While there are no reports of IBD specifically affecting pigeons, it has been shown to affect other species of birds including penguins. The significance of IBD is so great that it would be unwise to omit testing for this disease. There has been no sound demonstration that the virus can not be carried by pigeons (especially vvIBDV).

Time/distance criteria

Stakeholder comment –One stakeholder claimed that the distance of the source flock from outbreaks is not relevant for racing pigeons, and raised doubts about the adequacy of the 10 kms zone for wild birds.

Response: While we accept that the distance may not be relevant to racing pigeons, the protocol must apply to all pigeons, including fancy pigeons. The requirements in the draft protocol are consistent with the treatment for hatching eggs, and also consistent with AUSVETPLAN.

Other issues

Stakeholder Comment: The pre export quarantine facility building should be designed to adequately exclude access of all wild birds and vermin.

Response: Accepted.

Stakeholder comment: -Suggested regular observation by veterinary officer in Appendix 3 should be better defined.

Response: *Agreed. Have nominated not greater than 14 day intervals. This will ensure that birds are examined at less than the OIE defined incubation period, and should result in all cases of serious illness being identified.*

Stakeholder comment: Should amend requirement for all autopsy reports to be sent to the Director prior to export, to include only those which involve a disease of quarantine concern to be sent to the Director. All reports should be attached to the Health Certificate which accompanies the birds.

Response: *Agreed.*