



Australian Government
Biosecurity Australia

STAKEHOLDER COMMENTS TO BAPM 2006/31 AND BIOSECURITY AUSTRALIA'S RESPONSES

Comments were received from:

Dr M Wainscott, Chief Veterinarian, Macau Jockey Club

Dr P M Ellis, Convenor, Quarantine and Health Subcommittee, Australian Horse Industry Council (AHIC)

Mr Andrew Harding, Chief Executive, Australian Racing Board Limited (ARB)

Dr Peter Daniels, Assistant Director, Australian Animal Health Laboratory.

Dr M Wainscott, Chief Veterinarian, Macau Jockey Club

Comment: Dr Wainscott expressed support for and endorsed the proposed conditions. He advises that the Macau Jockey Club is ready to prepare small numbers of horses as soon as the conditions are adopted.

Biosecurity Australia's response: Noted.

Dr P M Ellis, Australian Horse Industry Council Inc.

The AHIC endorsed the proposed conditions but provided some queries raised by Subcommittee members. Where a comment applies to more than one set of conditions, this is indicated in the text.

Permanent importation

Comment: AHIC questioned 50 metre separation from other equines during pre-export preparation. This comment applied to each set of conditions.

Biosecurity Australia's response: This distance requirement is to address the risk of transmission of equine influenza to horses while in pre-export quarantine (PEQ). Stabling arrangements for horses for PEQ were assessed during Biosecurity Australia's visit to the Macau Jockey Club. The PEQ stables are situated on the other side of the track, a distance of some 500 metres from resident horse stables. The PEQ stables are within 100 metres of the straight, where horses may be exercised or raced but at all times horses in PEQ are more than 50 metres from the track when it is being used by other horses. The risk of transmission of equine influenza virus in this vaccinated population over these distances is considered to be extremely low.

Comment: AHIC asked why the requirement for cleaning and disinfection is removed from premises requirements (PEQ requirements). This comment applied to each set of conditions.

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

Comment: AHIC suggested moving PEQ premises siting requirements from PEQ premises requirements 'Operations' to PEQ premises requirements 'Facilities'. This comment applied to each set of requirements.

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

Comment: AHIC commented on which other horses might be permitted to accompany horses for export during PEQ (Operation, clause 5)

Biosecurity Australia's response: Biosecurity Australia is aware of the potential for small consignments to be prepared simultaneously in Macau. Biosecurity Australia considers that horses whose clinical history while in quarantine is reportable, would be eligible to complete PEQ with horses for export to Australia. Such consignments would need to be prepared under a dispensation approved by AQIS. The entire consignment would be required to meet all requirements for entry to Australia, and thus would also meet the requirements stated in Operations, clause 4, referring to 'all in, all out' PEQ.

Comment: AHIC suggested that rabies be added to certification of disease freedom for premises of residency (Certification, clause 1). This comment applied to each set of conditions.

Biosecurity Australia's response: Rabies transmission by horses is rare in endemic regions and such transmission has never been reported in Macau. However, at AHIC's suggestion, certification of premises freedom for rabies has been included in the conditions, making this consistent with other import conditions.

Comment: AHIC commented on Japanese encephalitis vaccine usage, noting that an inactivated vaccine should be used according to the directions of the manufacturer. This comment applied to permanent and temporary conditions.

Biosecurity Australia's response: Agreed. Inactivated vaccine is available and currently used in Macau. Clause 3 of the veterinary certification section in the temporary and permanent conditions has been amended to reflect this.

Comment: AHIC questioned the absence of testing requirements for contagious equine metritis (CEM).

Biosecurity Australia's response: Macau's import requirements for CEM are similar to Australia's. It is noted that Macau's import requirements allow importation (with testing) of horses from countries where CEM is known to occur. Opportunities for establishment of CEM in Macau are negligible since there is no horse breeding industry. Despite the risk of introduction of CEM into Macau being very low, Biosecurity Australia recognises that if a carrier horse was introduced it may not be detected while in Macau and could then be exported to Australia. Testing and certification requirements for CEM have now been included in the requirements at clauses 7 and 8 of the veterinary certification requirements.

Comment: AHIC asked who would perform the examination for external parasites on admission to PAQ premises (PAQ requirements, clause 2).

Biosecurity Australia's response: AQIS will provide a competent person to perform this examination.

Comment: AHIC questioned the use of the word 'may' in respect to any response to the discovery of external parasites (PAQ requirements, clause 2).

Biosecurity Australia's response: Wording has been amended to read 'will'.

Comment: AHIC commented on the retention of requirements allowing for treatments during quarantine surveillance (PAQ requirements, clause 3). AHIC considers that the option of quarantine surveillance may detract from necessary quarantine security if a horse does not completely fulfil quarantine requirements on entry.

Biosecurity Australia's response: Clauses 3 and 4 have been combined. Reference to quarantine surveillance has been removed.

Temporary importation

Comment: AHIC referred to its own comments on the permanent importation conditions.

Biosecurity Australia's response: Biosecurity Australia has amended the conditions for temporary importation where necessary to be consistent with the conditions for permanent importation.

Comment: AHIC questioned the absence of testing for equine infectious anaemia (EIA) (Veterinary certification, clause 6).

Biosecurity Australia's response: Testing requirements for EIA have now been included, consistent with other importation conditions for horses.

Comment: AHIC commented on the absence of a declaration of notifiability of equine piroplasmiasis in the conditions.

Biosecurity Australia's response: Biosecurity Australia recognises the very low likelihood of importation of equine piroplasmiasis into Macau and the extremely low likelihood that a horse with piroplasmiasis would be exported temporarily to Australia. Tick vectors have never been detected on horses in Macau and so disease transmission is not considered likely unless it occurred iatrogenically. Horses entering Australia under these conditions will remain under quarantine surveillance until re export. However, to provide additional assurance, the declaration that equine piroplasmiasis is compulsorily notifiable has been included in these conditions.

Comment: AHIC questioned the absence of external parasite examination on entry to PAQ (PAQ requirements).

Biosecurity Australia's response: An external parasite examination has been included in the conditions (Clause 2, PAQ requirements).

Return of Australian horses after competition

Comment: AHIC referred to its own comments on the permanent importation conditions.

Biosecurity Australia's response: Biosecurity Australia has amended the conditions to be consistent with the conditions for permanent importation.

Mr A Harding, Australian Racing Board Ltd

Comment: Supported the proposals.

Biosecurity Australia's response: Noted.

Dr Peter Daniels, Assistant Director, Australian Animal Health Laboratory

Comment: No specific comment to make.

Biosecurity Australia's response: Noted.