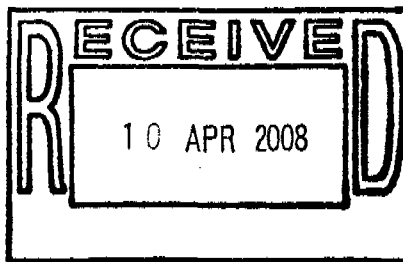




Date: 7 April 2008



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Mr Graham Millar
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Dear Mr Millar

Thank you for your letter dated 6 March 2008 seeking comments on the discussion papers covering possible options for any strengthening of Australia's biosecurity procedures for quarantine management of imported horses.

Of interest is the omission of any reference to the need for ongoing importation of horses. It seems this is taken as a given, yet the risks to the general horse population remain and the benefits accrue largely to the thoroughbred racing industry only.

The second omission noted from this document is an examination of the original Biosecurity Australia risk analysis around the importation of horses. As there is no such thing as a zero risk policy, presumably there will be some attempt at quantification of the number of disease breakdowns over periods of time, using the import protocol as it applied at the time. This should be examined again in the light of the costs encountered during the most recent outbreak to see if it represents a cost-effective level of risk.

The second paper contains a draft list of 41 exposure recommendations. These include the creation of a new External Auditor to be called the Inspector General of Horse Importation (IG), reporting directly to the Minister and Parliament and with sweeping overall powers in all matters relating to horse importation.

There is also a recommendation to create a new section of AQIS devoted to horse importation under the control of the Government Quarantine Veterinarian for Horse Importation (GVH). There are a series of recommendations on pre- and post-arrival quarantine procedures, including vaccination, testing, standard operating procedures, charges and fees and ongoing reviews.

There are some comments about these draft recommendations.

(1) In relation to the proposed IG:

- a. This proposed new position can only be justified if it is thought that the activities of BA and AQIS require continuous external audit. Logically, this condition should then apply to all areas of import risk under AQIS control, not only horse importations.
- b. The proposed role is that of an auditor, yet the qualifications proposed are those of a veterinarian who has not recently worked for any government agency. This does not appear consistent, in that no auditing skills are required and it assumes that people who have recently worked for a government agency will not be responsible.

(2) In relation to the proposed GVH:

- a. This proposed new position would report directly to the Executive Director of AQIS, elevating the status of horse importation above that of other "risky" import material. A



well balanced risk assessment case should be made to justify this emphasis. It is, however, acknowledged that a simplified hierarchical structure for equine importation is required.

(3) In relation to the Pre Export Quarantine:

- a. There is considerable prescriptive detail over what tests are required at what times. Some of this is not technically accurate eg Para 19 (e) refers to a PCR or ELISA test without specifying that these must be testing for viral antigen.
- b. The details of such testing are likely to change over time as new and improved procedures emerge. It is likely to be more appropriate that these details should be part of BA's risk assessment and mitigation documents.

(4) In relation to Quarantine Stations:

- a. Again there is much prescriptive detail, some of which may be based on outdated information on disease spread. This applies in particular to the separation of horse compounds by a distance of at least 35 metres. This may prove to be inadequate and should be subject to update as new epidemiological information becomes available.
- b. It is not appropriate to specify the exact tests performed on horse samples as these will change over time.

(5) In relation to Charges:

- a. This section specifies the charges to be made with respect to importing stallions on a temporary basis. However, the charges for all horse transportations must be reviewed and reflect the real costs.

(6) In relation to Ongoing Review:

- a. The process of ongoing review detailed is most important and covers the area well, except it omits the need for external consultation on any risk analysis performed. This is a particularly important area as the horse industry stakeholder feedback is essential. At the moment the horse industry is fragmented and the desire for importation is restricted to the wealthy sector of the horse owning community. Seeking and maintaining a balance between the needs and wants of the horse importing group with the others who desire a very low to nil risk environment for the horses will be essential and need to be addressed in the recommendations.

Yours sincerely



Geoff Knight
CHIEF EXECUTIVE