

# The Australian Veterinary Association Limited

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The Hon Ian Callinan QC  
Commissioner  
Equine Influenza Inquiry  
PO Box 72  
Queen Victoria Building  
SYDNEY NSW 1230

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Dear Commissioner

The Australian Veterinary Association was granted leave to appear and made a Preliminary Submission to the Inquiry last year. The AVA stands by that submission which is complemented by the attached submission in response to your draft recommendations.

It is imperative that the confidence of the horse industry in AQIS and the quarantine system is restored as quickly as possible. The importation of horses or genetic material must present very low risk. This is possible if risk analysis and risk management are best practice as demonstrated in the past.

More than \$100m has been spent in eradication of equine influenza and to realize the benefits of this Australia should ideally no longer vaccinate. Stakeholders in the horse industry will soon be pondering the risks of a population of horses naïve to EI and whether to support or allow ongoing vaccination. Opinions will vary widely. It has been Australia's long term position not to vaccinate against disease exotic to the country. Vaccination can mask infection and allow it to spread in the vaccinated population before spreading to unvaccinated animals. This has happened elsewhere with EI. Permanent, ongoing vaccination of all available horses, is very expensive and one reason it was decided to attempt to eradicate EI. There are other implications such as the loss of access to the Emergency Animal Diseases Response Agreement and its cost sharing elements leaving individual horse owners and small industry groups to meet the costs of outbreaks without government support.

Other industries can also be affected by a precedent in vaccination for an exotic disease and its effects on Australia's animal health status.

The AVA places its considerable expertise in the areas of biosecurity and quarantine at the disposal of the Commission and I and appropriate members are available to appear if this would be of assistance. Our submissions seek to provide a way forward in the interests of the Australian community.

Yours sincerely

Dr Diane Sheehan  
**National President**  
1 April 2008

## The Australian Veterinary Association

### Supplementary Submission to the Equine Influenza Inquiry Draft Recommendations



#### General

The Australian Veterinary Association (AVA) made an interim submission to the Inquiry, an updated copy of which is attached. This paper addresses the draft recommendations put forward to us for comment.

The AVA recognises that the terms of reference of the Inquiry are limited to horses. However the AVA is conscious of the need for measures developed for horses to be consistent with the wider roles of the Australian Quarantine and Inspection Service (AQIS) and Biosecurity Australia (BA) as they relate to all animals, genetic material and animal derived products. It is in this context that references to other species and products may be made in this submission.

The AVA will also make a comprehensive submission to the Beale Inquiry.

#### Continuum of quarantine / bio-security

The Inquiry has addressed the pre-border and border bio-security / quarantine policy and operations which are responsibilities of the Commonwealth. Attention has to be given to the continuum of bio-security / quarantine which includes pre-border/ border and post border activities. The last are responsibilities of the "States" (including the territories) and include disease control at farm and post farm levels. Since the termination of the agency arrangement for delivery of quarantine by the states, which commenced in 1994, engagement of the expertise of the states in quarantine policy and operations has faded. Yet the states carry responsibility for eradication of emergency animal diseases that penetrate the barrier. The agency arrangement was the subject of a Governor-General / Governors agreement going back nearly to Federation and now lost. Reference is made below to engagement of the states.

The AVA emphasises that protocols for horse importations (as with other species) should as a minimum comply with the *Terrestrial Animal Health Code* of the Office International des Epizooties (OIE) – World Organisation for Animal Health. Australia generally has additional requirements. The *Code* includes procedures applicable before and at departure, during transit, on arrival and post-arrival quarantine. *The Code* is on the internet at

[http://www.oie.int/eng/normes/mcode/en\\_sommaire.htm](http://www.oie.int/eng/normes/mcode/en_sommaire.htm)

The Equine Influenza Chapter 2.5.5 is at

[http://www.oie.int/eng/normes/mcode/en\\_chapitre\\_2.5.5.htm](http://www.oie.int/eng/normes/mcode/en_chapitre_2.5.5.htm)

The AVA is seeking to ensure that world's best practice is employed. Australia has been a leader in developing quarantine approaches and contributing to development of the *Code*.

#### Inspector General of Horse Importation – External Auditor

1. The AVA supports in general terms the recommended appointment of an Inspector General of Horses ("IG") with powers of inspection of quarantine premises both in Australia and overseas. This will allow an intimate understanding of the Quarantine Continuum of pre-border / quarantine / post-border controls.

An independent authority to audit, advise on changes and keep work instructions, standard operating procedures and other procedures updated and current, with flexibility to strengthen procedures quickly following alterations in overseas countries disease status, can only benefit Australia. Further reference to pre-border activities is made later in this submission.

The AVA recommends that the person in this position also be granted the power to engage the States and Territories in consultations on operations of horse imports.

The AVA finds the qualifications and functions proposed for the IG appropriate in the context of horse importations appropriate.

All species

It is clear that an Inspector General should have a similar role across all species and commodities and as such could have more general veterinary qualifications and experience. The three year exclusion from government service would be appropriate.

### **Government Quarantine Veterinarian for Horse Importation**

2. Appointment of the Government Quarantine Veterinarian for Horse Importation ("GVH") to oversee a hierarchical chain of command will ensure that there is designated accountability and responsibility. This "line" position must be adequately supported by the usual "staff" positions with administrative roles e.g. finance, personnel. The AVA recognises that importation is a multidisciplinary exercise.

The AVA supports the qualifications and functions proposed for the GVH in the context of horse imports. A prerequisite of equine veterinary experience should again ensure a valuable overview of the quarantine requirements for horses.

Quarantine station staff, including the officer-in-charge under the GVH (or on-station veterinarian if there is one) should also operate under the former requirement for livestock / animal handling skills and be trained in horse health so as to advise the GVH / AQIS veterinary staff of any illness in the animals. This would mean that that detection of disease is not dependent upon grooms and private practitioners alone.

The GVH should be responsible for all professional activities in the import chain, including the quarantine stations. The AVA considers that the GVH role need not be a stand alone position, but that it might be performed by a senior veterinarian such as Branch head.

All species

As with the IG either the GVH or a veterinarian of similar standing should have line responsibility for all live animal, genetic material and animal product imports. That is as they should head up an animal quarantine branch as was the case for about 60 years prior to the current arrangements.

### **Pre-Export Quarantine**

The proposed arrangements for inspection and approval of premises and for movement and loading of horses are generally appropriate. The AVA recognises the need for timely approval which can be based on requirements

established with the exporting country and inspected by the representative of the GVH (such as Veterinary Counsellors based in Australian embassies).

On farm isolation and testing prior to entry into PEQ premises may form part of the risk management measures and may need consideration by the IG and GVH.

Electronic transmission of certification and, where necessary, test results before departure of horses, would also assist in ensuring that horses meet Australian requirements and minimise the chance of error.

An important consideration when approving new countries for exports of particular species of animals or products is an evaluation of its ability to meet Australia's inspection and certification requirements and its reliability in enforcing them. This may include veterinary legislation, veterinary services infrastructure, laboratory support, disease surveillance, risk analysis, maintenance of disease status and disease free zones, quarantine premises, animal identification systems and available registered drugs and vaccines.

Chapter 1.3.3 of the *Terrestrial Animal Health Code* of the Office International des Epizooties (OIE – World Organisation for Animal Health) provides for Evaluation of Veterinary Services. See

[http://www.oie.int/eng/normes/mcode/en\\_chapitre\\_1.3.3.htm](http://www.oie.int/eng/normes/mcode/en_chapitre_1.3.3.htm)

### **Airport Facilities**

Quarantine facilities are necessary for handling horses at airports. Handling should be minimised because it creates stress in fatigued animals, especially groups of stallions. While horses that have travelled together by plane will have the same disease status there will be some value in isolating clinically affected animals provided that this can be done with minimal delay and stress. Facilities do not need to be elaborate. The AVA believes that the recommendation should be for AQIS to establish a group to consult experts, stakeholders, civil aviation and airport authorities rather than make judgements on details.

Use of Tullamarine is crucial for gaining access to the Sandown quarantine facility and access to it should be facilitated. Infrastructure investment at the airport to enable horses to be safely imported through this port while minimising the biosecurity risk to Australian horses is essential.

### **Quarantine Stations**

The AVA agrees with the proposition that government quarantine stations should be available for horse importations. Private stations may not be available for all importers / competitors. Government stations must comply with all requirements imposed on private stations especially the Hazard Analysis Critical Control Point (HACCP) approach to quality assurance and routine and non-routine audits.

The AVA supports the recommendations in general but believes details of requirements should best be developed by consultations with experts and stakeholders as described for airport facilities.

Stations need to be equipped to handle clinical needs of animals without having to remove the horses beyond the quarantine barrier. While recognising that it is expensive to have full equine surgical and medical facilities and equipment on stations, these facilities are necessary to enable the health and

welfare needs of imported horses to be met with full quarantine security. It must be recognised that stallions are unlike other horses and require special facilities to enable safe and reliable handling and to meet their special needs of containment and separation. At a bare minimum there should be a horse treatment area with a solid horse crush with appropriate strength and padding to enable proper restraint for blood testing and other more invasive procedures. Only then will possible treatment and testing requirements satisfy the OH&S standards for horse handlers and veterinarians. The AVA supports the building of adequate medical and surgical facilities at the quarantine stations to ensure the health and welfare of the imported horses is protected.

Hospitalisation and isolation facilities need to be appropriately equipped and maintained. Advice should be sought from the veterinarians involved in providing services to these animals to allow the facilities to quickly reach world's Best Practice standards. Consideration should be given to the major users of the equine quarantine facilities paying for the provision of such surgical and medical facilities necessary to ensure the health and welfare of the imported horses.

### **Standard Operating Procedures**

The recommendations look appropriate with one exception. The requirement for a 12 hour exclusion from seeing horses after contact with horses in quarantine in paragraph (d) could be difficult. Horse emergencies such as colic need immediate attention and veterinarians have ethical and practical obligations to do so. Effective decontamination measures can be implemented to allow such contact with minimal risk to the general horse population.

Part of paragraph (d) could be replaced with "...shall not have contact with a horse in the general horse population after contact with a quarantined equine unless they have had a full body shower including hair, had a complete change of clothing and instruments and, where considered necessary, wear disposable gloves."

In the past quarantine veterinarians have accompanied horses on aircraft where AQIS considered it necessary. Such accompaniment is likely to be appropriate for the first shipment from a country, a particularly complex flight, an importer who has not performed well with previous shipments or audits, or an importer who may not have the necessary expertise to manage the horses.

### **Charges**

When establishing charges the staffing and resources required to perform the quarantine should be determined and then a cost accounting approach to meet cost recovery policies can be applied.

### **Ongoing Review**

AQIS needs to employ veterinary staff who are kept up to date with world animal disease distribution and outbreaks that are relevant to Australia's bio-security. The outbreak of EI in South Africa is a case in point. AQIS veterinary staff must have veterinary skills commensurate with their responsibilities. They must be appropriately trained and capable of making essential judgements as well as being in a position to ask Biosecurity Australia (BA) the crucial risk assessment questions. They should not be passive and wait for advice only when BA sees fit to give it.

AQIS veterinarians should be registered as veterinary practitioners and undertake the continuing education required by their registration Board. They should be an active part of the veterinary community and contribute to the literature, OIE standard setting and other bodies.

#### **Powers of GVH and IG**

No comment except in relation to the exclusion from contact with non-quarantine horses for 12 hours. Again emergencies are such that alternative risk measures such as showering and changing need to be provided as alternatives as indicated above under standard operating procedures.

*The Australian Veterinary Association Limited  
March 2008*