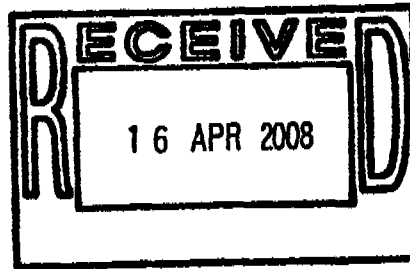




# Department of Primary Industries

SUBS.VIC.001.0001



Our Ref: SI003541

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Our Ref:

Dear Mr Millar,

## OPTIONS FOR STRENGTHENING BIOSECURITY PROCEDURES

Thank you for your letter dated 6 March 2008 inviting comments on two papers recently posted as part of the Equine Influenza (EI) Inquiry.

The 'Possible issues for submissions and further tentative timetable' appears to be quite comprehensive given the Inquiry's limited terms of reference. From Victoria's perspective, 6 (g) might be broadened to include an assessment of whether biosecurity procedures at Spotswood Quarantine Station need to be strengthened.

However, it is difficult to provide definitive comment on the 'Exposure recommendations' without knowing the conclusions of the Inquiry nor a full account of the reasons for the exposure recommendations.

I note that the terms of reference of the Inquiry are limited to the EI outbreak and to biosecurity procedures for the management of imported horses. Notwithstanding that, the Inquiry has clearly identified broader, systemic issues across the entire Australian Quarantine Inspection Service (AQIS) Animal Import Program (not just for horses). The exposure recommendations concerning high level veterinary management, independent veterinary audit and review would appear to be necessary across the entire AQIS animal importation program.

Clearly, the exposure recommendations of the Inquiry will need to be considered in a more holistic way by the Commonwealth Government. I hope and trust that the broader review of quarantine and biosecurity that is underway will facilitate this.

It would be preferable for the exposure recommendation of cessation of imports through Melbourne airport (until such time as better facilities are constructed) be couched more positively as a strong recommendation that the Commonwealth Government undertake to negotiate and make appropriate arrangements for such development to occur. It is vital to the Victorian and national interests that horse imports into Tullamarine airport continue. For example, the Spring Racing Carnival relies heavily on horses imported to Sandown through Tullamarine airport.

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The exposure recommendation that quarantine of imported horses 'should not as a general proposition be privatised' is a little surprising given the wide recognition that the highest standard of biosecurity of the three horse quarantine stations was the privately managed facility at Sandown.

I note that the suggested changes to the two government quarantine stations will reduce EI risk somewhat, but will add very significantly to the costs of importing horses. Other potentially less costly means of mitigating the risk should also be canvassed.

I am advised that implementation of the exposure recommendations *in toto* would unquestionably reduce the risk of another EI incursion to negligible. The infrastructure and management costs when fully assumed, as is appropriate, by the risk-generators (the importers of horses) will significantly increase the cost to import horses. It will be important for the Commonwealth Government to get the balance right and not impose requirements that over-manage the risks and/or exceed what is needed to maintain a very low level of risk with horse imports, in accordance with international obligations.

Yours sincerely



**Richard Bolt**  
Secretary

13/4/2008