

**REVIEW OF SUBMISSIONS ON:**

**DRAFT IMPORT HEALTH STANDARD FOR HORSES FROM AUSTRALIA**

Biosecurity New Zealand  
Ministry of Agriculture and Forestry  
Wellington  
New Zealand

**10 March 2008**

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Import Standards Group  
Biosecurity New Zealand

**REVIEW OF SUBMISSIONS ON:**  
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10 March 2008

Approved for general release

Clive Gower-Collins  
Biosecurity Standards Group Manager  
Biosecurity New Zealand

## INTRODUCTION

The draft import health standard for horses from Australia was notified in the MAF publication Biosecurity Act 1993, Section 22, 11 February 2008.

MAF received submissions from the following:

Sue Bennett	Crispin Bennett International Horse Transport (CBIHT)	25 February 2008
Stacey Hartshore		14 February 2008
Paula Brambley		28 February 2008
Nicholas King	Waikato Thoroughbred Breeders Association (WTBA)	10 March 2008
Evelyn Williamson		13 February 2008
Leanne Perry-Meyer	Department of Conservation (DOC)	14 February 2008
Petra Davidson		10 March 2008
L.M. & A.T. Pellow		20 February 2008

This document summarises the issues raised in the submissions, and presents the MAF Biosecurity New Zealand response to each.

## SUBMISSIONS

### 1. CBIHT

1.1 CBIHT suggested that the importer and/or exporter be permitted to request equivalence from MAF BNZ rather than the Australian Quarantine Inspection Service (AQIS).

**MAF Biosecurity New Zealand comment:**

This is a standard clause in all our Import Health Standards to allow for government to government communication on trade issues. MAF BNZ does engage with exporters and importers where this does not conflict with the government to government agreement.

1.2 CBIHT suggested the time to lodge an import permit be reduced.

**MAF Biosecurity New Zealand comment:**

The import permit application has been reduced from 30 to 21 days, and this has been amended in section 5.1 of the IHS.

1.3 CBIHT raises the issue that many horses were vaccinated with a 14 day interval during the recent EI outbreak

**MAF Biosecurity New Zealand comment:**

Upon request Merial have provided MAF BNZ with assurance that 2 Proteq Flu vaccines given 14 days apart gives equivalent immunity to the manufacturer's recommendation of 28 days apart. The IHS has been amended to reflect this in section 5.2.1.2.

1.4 CBIHT points out an error when referring to section 6.1 in the IHS

**MAF Biosecurity New Zealand comment:**

Clause referencing has been corrected.

1.5 CBIHT suggests that the separation required from other horses not being quarantined for export to NZ be reduced to less than 100m.

**MAF Biosecurity New Zealand comment:**

Given the possibility of airborne spread it has been determined that 100m is the minimal safe distance.

### 2. Stacey Hartshore

2.1 Stacey noted that the quarantine intervals were "a bit extreme", especially with regard to horses that had not had contact with EI horses.

**MAF Biosecurity New Zealand comment:**

We expect the quarantine conditions may be reduced in the future. Due to the nature of spread of Equine Influenza (EI), including fomite<sup>1</sup> spread, it is not practical to limit these conditions to in-contact horses, or to only states that were affected by EI.

<sup>1</sup> Fomite spread is the spread by objects for example saddles, horse leads etc

2.2 Stacey raised the concern as to whether the NZ government should have restarted the importation of horses from Australia.

**MAF Biosecurity New Zealand comment:**

These conditions are very similar to the conditions required when importing from countries that have or vaccinate for EI. Therefore it is appropriate to allow trade to resume with Australia.

**3. Paula Brambley**

3.1 Paula suggests that horses from unaffected states be allowed entry into NZ with no quarantine or no vaccination.

**MAF Biosecurity New Zealand comment:**

See response 2.1

3.2 Paula believes that people will “punished” with hefty and unnecessary quarantine bills.

**MAF Biosecurity New Zealand comment:**

The quarantine conditions may be reduced in the future. Trading without quarantine at present would pose an unacceptable level of risk of introduction of EI. Specific analysis has demonstrated sufficiently that significant costs (financial, social and in terms of animal welfare) would occur should NZ have an outbreak of EI.

3.3 Paula feels that the risk of horses from NSW or QLD transferring EI to horses in EI free states is very unlikely.

**MAF Biosecurity New Zealand comment:**

MAF BNZ will maintain consistent measures across all Australian states due to the relatively free movement of horses within Australia.

**4. Waikato Thoroughbred Breeders Association (WTBA)**

4.1 WTBA notes that the standards in management of quarantine facilities on both sides of the Tasman need to be of the highest quality.

**MAF Biosecurity New Zealand comment:**

Post arrival quarantine in New Zealand is at a high standard and the situation in Australia has highlighted the importance of this. AQIS has fully engaged with MAF BNZ to ensure that they are interpreting and enforcing our requirements for pre-export isolation.

4.2 WTBA suggested that NZMAF and Biosecurity NZ have some input into monitoring of quarantine centres in Australia.

**MAF Biosecurity New Zealand comment:**

MAF Biosecurity New Zealand does not, in general, audit offshore animal quarantine facilities. A wide range of trade between NZ and other countries is

managed on this basis. MAF BNZ has determined that status quo is acceptable in light of the Australian government's understanding of recent events and strengthened measures in the transitional facility standard for low security farm animals. AQIS has fully engaged with MAF BNZ to ensure that they will be interpreting and enforcing our requirements for pre-export isolation.

4.3 WTBA suggests that funding should be in place for the Equine Health Association (NZEHA), to be used in the event of an outbreak of EI.

**MAF Biosecurity New Zealand comment:**

Such an issue lies outside of the scope of this IHS submission process.

**5. Evelyn Williamson**

5.1 Evelyn feels that Australia is not capable of quarantining horses adequately

**MAF Biosecurity New Zealand comment:**

See clause 4.2

5.2 Evelyn suggests that the NZ quarantine should be at least 4 weeks

**MAF Biosecurity New Zealand comment**

New Zealand is signatory to the Sanitary and Phytosanitary Agreement (SPS), the World Trade Organisation's agreed rules on how countries can protect the health of their people, animals and plants, while facilitating trade.

The SPS agreement provides a framework for trading within acceptable safety parameters. It requires all mitigation measures to be scientifically justified and in accord with our international trade obligations.

The post arrival requirements in the standard are consistent with the measures in place for horses from countries that also have EI.

5.3 Evelyn would like to keep NZ borders closed to the importation of horses from Australia for 6-12 months following any outbreak of EI

**MAF Biosecurity New Zealand comment:**

These conditions are very similar to the conditions we require when importing from countries that have EI, so it is appropriate to allow trade to resume with Australia. Clause 5.2 is also relevant.

## 6. Department of Conservation (DOC)

6.1 DOC suggests that it would be helpful to divide the IHS into two sections; one to cover when EI is present and the other when the country is EI free. This would then avoid long suspensions in the importation of horses in the face of an outbreak.

**MAF Biosecurity New Zealand comment:**

Amending the IHS to include provisions for the importation from an EI free country or in the face of an outbreak would not be feasible, as this would then need to apply for all other diseases. This would not only increase the length of the IHS, but also the time to develop one. The suspension of trade in the face of an outbreak is an important process as it allows us time to ensure we are not dealing with a new or different strain of the disease that may require different mitigation measures.

6.2 DOC suggests the inclusion of a commodity description so that it is clear what is meant by Horse

**MAF Biosecurity New Zealand comment:**

A commodity description has been clarified in section 6 of the IHS.

6.3 DOC suggests that the term “single consignment” should be defined

**MAF Biosecurity New Zealand comment:**

5.3 has been expanded to clarify what a single consignment is.

6.4 DOC suggests putting in an exact link to this standard

**MAF Biosecurity New Zealand comment:**

Standards may have their name changed as they are amended and reissued and a link may become redundant, therefore we put in the search engine.

6.5 DOC thinks it may be helpful for the importer to declare any equipment suspected of being in contact with an EI infected horse within say the last 72 hours

**MAF Biosecurity New Zealand comment:**

Imported horse equipment is covered in the conditions of the Import Health Standard for importation of equipment associated with water or animals. This is referenced in clause 6.3 of the IHS

6.6 DOC feels that direction regarding the type of bedding and/or feed used during transportation should be included in section 8 of the IHS

**MAF Biosecurity New Zealand comment:**

This is covered in clause 8.4 and 8.5

6.7 DOC notes that horses should be inspected for contaminants and if necessary washed/groomed 24 hours prior to transportation

**MAF Biosecurity New Zealand comment:**

Clause 7.3 has been added to the IHS

6.8 DOC highlights concerns regarding vaccination masking the clinical signs of EI

**MAF Biosecurity New Zealand comment:**

This is certainly an issue when trading from countries that have a horse population that is vaccinated for EI. This issue is mitigated by other measures such as 5 weeks quarantine and PCR testing.

6.9 DOC raises the concern that a 14 day quarantine period is considered sufficient to minimise the risk associated with the shedding of virus from recently vaccinated horses

**MAF Biosecurity New Zealand comment:**

Horses have to be vaccinated 6 weeks prior to being exported to New Zealand. MAF BNZ does not allow the use of live whole vaccines thus shedding of virus due to vaccination should not be an issue. Both vaccines we allow for are not known to have shed virus post vaccination. Clause 5.5 has been added to say that vaccines are not to be given during pre-export isolation.

## **7. Petra Davidson**

7.1 Petra questions the extended time taken to instigate the quarantine measures for Australia

**MAF Biosecurity New Zealand comment:**

In consultation and agreement with representatives of equine interests across New Zealand it was decided that trade would not occur until the scope of the outbreak was clarified and under control. A new Import Health Standard takes time to develop and the process was initiated once representatives of equine interests were happy for trade to be considered again.

7.2 Petra raises concerns over the availability and quantities of vaccine required

**MAF Biosecurity New Zealand comment:**

The provision of vaccines is a matter for the equine industry to respond to. It is likely that a number of horses have already been vaccinated as part of the control and eradication measures in Australia.

7.3 Petra has concerns as to what will happen to horses awaiting importation if there is insufficient vaccine

**MAF Biosecurity New Zealand comment:**

Trade could not occur until these horses met the conditions of our IHS, or equivalence was agreed upon.

7.4 Petra has concerns regarding the availability of sufficient quarantine facilities in Australia to cope with the volume of horses

**MAF Biosecurity New Zealand comment:**

The provision of quarantine facilities is a matter for the equine industry to respond to.

7.5 Petra has concerns regarding the availability of sufficient quarantine facilities in New Zealand to cope with the volume of horses

**MAF Biosecurity New Zealand comment:**

See 7.4 and 3.2. For a quarantine facility to be approved the conditions in the transitional facility standard for low security farm animals need to be met.

7.6 Petra questions what steps have been taken to ensure that sea freighters will have access to quarantine facilities

**MAF Biosecurity New Zealand comment:**

See 7.5

7.7 Petra asks what will happen to horses awaiting importation if there are insufficient quarantine spaces

**MAF Biosecurity New Zealand comment:**

Horses will have to wait until a space becomes available.

7.8 Petra asks how long NZ will maintain a quarantine requirement

**MAF Biosecurity New Zealand comment:**

This is dependent on the ongoing assessment of the situation in Australia. At this stage it is not feasible for MAF BNZ to predict when, if or what any change in measures may look like.

7.9 Petra asks how long it will take to remove our quarantine requirement once Australia is EI free

**MAF Biosecurity New Zealand comment:**

See 7.8

## **8. L.M & A.T Pellow**

8.1 The question for the necessity for quarantine at all is raised, and that MAF is revenue gathering

**MAF Biosecurity New Zealand comment:**

Quarantine is necessary due to the risk of unidentified virus circulating in vaccinated horses; these horses may show little in the way of clinical signs like coughing, but can spread the virus to other horses.

At this stage quarantine restrictions are required to enable horses to be imported from Australia. MAF BNZ does not financially benefit from quarantine as these are privately run.

## **9. Additional MAF Biosecurity New Zealand comment**

In addition please note that horses that have a certificate of immunity will still be required to be vaccinated as per the Import Health Standard. The author was asked this question verbally on a number of occasions but it was not raised in the received written submissions.

## APPENDIX ONE: COPIES OF SUBMISSIONS

### 1. CBIHT

Dear Rachelle,

Please find following our comments on the proposed Import Health Standard for Horses from Australia:

Page—4 Equivalence

Suggest that the importer and/or exporter be permitted to approach MAF for equivalence, as the Australian Quarantine Inspection Service (AQIS) is not renowned for providing timely submission.

5 Permit to Import 5.1

Suggest that the time to lodge an import permit be reduced, as export shipments are not usually finalised so far in advance. Final details might not be known until the time the PEQ starts. Perhaps the application period could be reduced to 20 days prior to departure so that the application can truly reflect the final make up of the shipment, after the PEQ has commenced.

5.2.1.2

In New South Wales, Queensland and Victoria many horses were vaccinated as part of disease control. However, in many cases the vaccinations were less than 28 days apart. Suggest that where horses were vaccinated for disease control, that the period between vaccinations be reduced to 14 days which was the government agreed to period during that initial vaccination period.

Page 12—8 Veterinary Inspections 8.1

8.1 refers to treatments in section 6.1. However, there is no section 6 contained within the document.

4 Facility 4.1

Reduce the separation required from other horses not being quarantined for export to New Zealand to much less than 100 metres.

The above requirement limits the number of properties that are suitable for the pre export quarantine of horses for export to New Zealand. Perhaps in QLD and NSW (States that have had cases of Equine Influenza) 100 metres separation is warranted but it seems unnecessary for Victoria.

Please don't hesitate to call should you have any queries. Kind regards,

Sue Bennett  
Crispin Bennett International Horse Transport  
PO Box 2009DC  
Sunbury Victoria Australia 3429

## 2. Stacey Hartshore

Miss Stacey Isobel Elizabeth Hartshorne  
PO Box 97525  
South Auckland Mail Service Centre  
Auckland  
2240  
New Zealand

Ph: 0272799225/09 292 8008  
Fax: 09 268 8589

I have a horse waiting to come from Melbourne, when the borders open. Since I have an interest in the outcome, I thought it would be in my best interests as well as those affected in the same way to make a comment on the new Import Health Standards.

I feel the new quarantine intervals are a bit extreme, especially for those horses that have had no contact with others that have Equine Influenza and have not been in an area that has been infected. However, regardless of this, if this is the least amount of time that they can spend in quarantine than I agree with the new regulations. I also agree with the vaccinations and tests, as this will give my mare extra protection if she was ever to come into contact with EI in the near future. It will also ensure that she doesn't have it, hence ensuring the well being of the other horses on our property.

Since she will be coming from Australia, where EI was present, there could possibly be a lot of scepticism as to whether the government should have let any horses in from Australia yet. Due to her origin, many people will probably have a watchful eye on her condition, hence the paperwork, filled out by an official vet, clearing her of any infection will help immensely in ensuring that the government did make the right decision.

Bringing our horses home, after waiting in angst for nearly 7 months will be a great thing for people involved in New Zealand's horse industry. It's very difficult financially and emotionally to leave a horse in a foreign country, with someone you only have contact with through email or over the phone, with someone who it is necessary to trust completely with something that is not just an animal, but is regarded as a member of the family that is very close to your heart.

I do hope that the government decides to go with these Import Health Standards as they are more than satisfactory and they ensure the well being of horses that are being imported as well as New Zealand horses.

I look forward to a positive outcome,

Stacey Hartshorne

I wish to make a submission regarding the new Draft Import Health Standard for Horses from Australia.

It is my submission that horses from states that were unaffected by the EI outbreak (Victoria, SA, WA etc) be allowed entry to New Zealand in the same manner as prior to the Outbreak. No Quarantine or vaccination for EI etc.

Providing proof can be furnished that these horses have resided in that state for the last 6 months (during the course of the Standstill) they have not been exposed to EI therefore do not pose any threat by being imported to New Zealand.

Australia have proven MANY people wrong in their bid to Successfully Eradicate EI and it would be great if both countries could go back to the way Importing/exporting used to be before the outbreak. I do not believe punishing people with horses in EI free states with Hefty (and Unnecessary) Quarantine Bills is fair.

It is still VERY difficult to move a horse from a previously infected state (NSW, QLD) even though most of these Zones have been cleared of EI. Any horses entering EI Free states from NSW or QLD must undergo a quarantine period and be resolved from EI and or vaccinated. Therefore the risk of horses from NSW or QLD transferring any Virus to horses in EI free states is VERY unlikely.

Yours Sincerely.

Paula Brambley  
234 Oyster Point Rd  
RD 4 Warkworth  
New Zealand

Phone 09 420541

Paula & Ramon Brambley  
[www.freewebs.com/playparkstud](http://www.freewebs.com/playparkstud)



10<sup>th</sup> March 2008.

To Whom It May Concern:

The Waikato Thoroughbred Breeders Association would like to submit the following points for consideration on the issue of health standards for horses imported from Australia.

At our latest Branch Committee meeting in February, the above issue was raised and discussed at length. Obviously this issue has huge ramifications for our members who represent a very large portion of the stakeholders in the thoroughbred racing and breeding industry in NZ.

Our member's greatest concern is that the safest possible procedures are attached to the re-opening of the border with Australia, so that we can continue the successful management of the Equine Influenza risk.

Points brought forward for submission were as follows:

1. (a) That the standards and management of the quarantine facilities on both sides of the Tasman be of the highest quality and adhere to the most stringent rules possible. It is obvious that the initial crisis in Australia had a degree of breakdown in procedures at the quarantine centre and is therefore important that this does not re-occur.

(b) That the quality of both care and quarantine procedures, and the requirements for the quarantine centres in Australia have input by way of monitoring from NZ via NZMAF and Biosecurity NZ. This is to ensure we do not lose control of the most vital part of E.I. control (i.e. The first 3 weeks of quarantine in Australia) The greatest concern would be that, over a period of time, the quality and effort put into the correct procedures and requirements at these centres may lapse or become haphazard.

On-going vigilance and monitoring from NZ would be essential.

2. That correct funding streams are in place for the Equine Health Association (NZEHA). In the event of an out-break, they will be a front line organisation who reach across all horse breeds and codes, and therefore the most effective at communication and tactical planning.

We believe that we have been very fortunate indeed in having avoided an outbreak of E.I. so far in New Zealand. We very much look forward to the re-opening of the border with Australia with regards to the importation and movement of horses again.

This will enable many of our members to restart this side of their business which relies on horses coming back from Australia.

We hope that this is done with great thought and care as there is much at stake.

Yours Sincerely,

Nicholas King

President of the Waikato Thoroughbred Breeders Association

Ph: 07-824-0855 Fax: 07-824-0856

Mobile 0274-416-442

Brighthill Farm, RD 4, Hamilton

Hi Rachelle

I have just read the information about new quarantine rules and would like to make a comment.

Australia has shown that it is not capable of quarantining horses adequately.

I really feel that for at least the next six months that horses arriving from Australia should spend at least four weeks in quarantine in NZ.

Having owned a horse in the past in the UK that had EF followed by pneumonia I know first hand the speed EF can travel and the damage it can do not only to the horse but to equine businesses.

Two weeks quarantine in NZ is just not enough time. I certainly don't want my horses put at risk!

Extend the time until Australia has had a good six months to a year free of any outbreak.

Kind regards

Evelyn Williamson  
07 823 2049

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## **Comments on the Draft Import Health Standard for Horses from Australia**

Thank you for the opportunity to review this draft Import Health Standard (IHS). The Department of Conservation has the following comments:

### **General comments**

#### **Flexibility**

An Equine Influenza (EI) outbreak is a constant threat for Countries such as New Zealand, Australia, Japan and South Africa, where EI is generally not considered endemic. The movement of horses between these countries and in particular New Zealand, Australia and Japan is very frequent including for racing events and bloodstock sales. Therefore it is vital that import measures are sufficient to mitigate risk and also flexible enough to ensure minimal disruption.

We note that in the case of the EI outbreak in Australia, eradication is highly feasible both due to the self-limiting nature of the viral disease and the rapid actions taken to control its spread. Therefore it is possible that in the near future (possibly a few years) Australia could be again declared EI free. The relatively rapid change in EI status for Australia and other EI free countries suggests that any import health standard developed for horses from these countries needs to be flexible enough to cope with responding to EI incursions including suspected cases.

The Department considers that it would be prudent to include in all IHS from these countries (Japan, South Africa and Australia) requirements that mitigate the risk of the importation of EI infected horses in the event of a suspected or confirmed outbreak of EI in those countries. This would avoid the need for long suspensions in the import of horses from these countries (whilst an IHS for EI was being drafted) and ensure that emergency import measures were immediately available.

Therefore we suggest that it would be helpful if the IHS were divided into two sections, one for measures that are required when EI is considered present, and one for when a country is EI free. We note that there is minimal risk that arises from this automatic reduction of measures once a country is declared officially EI free (due to the 12 month free status needed to justify such a declaration) and having the reduced measures outlined in the IHS for Horses will mean that the movement of horses will have the least interruption.

However, as a precaution we consider that it is prudent to include that the IHS will be temporarily suspended in the case of a suspected/confirmed EI outbreak in order that the measures for the import of horses from that country can be assessed to ensure that they are still considered appropriate.

## **Specific comments**

### **Commodity description**

We suggest the inclusion of a commodity description so that it is clear what is meant by Horse i.e. domesticated animals of the species *Equus caballus*, as opposed to the looser definition used to include all species in the family Equidae, such as donkey, mules and zebras, which are also susceptible to EI.

### **Section 5.3**

We suggest that the term “single consignment” should be defined as it is unclear whether this is a plane load, a transporter load, or what is the likely maximum number of horses involved.

### **Section 6.3**

We suggest that it would be helpful to put in the exact link to this standard rather than the standards site as provided.

EI is spread via aerosols, surviving on hard non-porous surfaces for 24-48 hrs, 8-12 hrs cloth and tissue, soil (24 hrs in the dark) and water up to 18 days (dependent on humidity and temperature). We have reviewed the suggested treatments (such as washing, and fumigation etc) and consider that the measures proposed in the equipment standard are likely to be sufficient in most instances. Nevertheless, we would suggest that it could be helpful if the importer is required to declare whether any equipment has or is suspected of being in contact with a EI infected horse within say the last 72 hours especially in the case of clothing which people often forget to declare.

## **8 Transport to New Zealand**

We note that there is an absence of direction regarding the type of bedding and or feed to be used with the horses during transportation in this section. This information is included in the Zoosanitary Certificate, however we consider that it would be more useful for the exporter/importer if it were included here also.

## **IV: Sanitary Information – Establishment of Origin**

The listing of information including the disease free period was very useful.

## **Pre-Export Isolation – Inspection for contaminants**

We note an absence of the requirement that the horses are to be inspected for evidence of contaminants such as plants/seeds/soil adhering to their coats/tails and or hooves. We suggest that you could include that if necessary horses should be washed/groomed 24 hours prior to transportation including the removal of any excrement.

## **Post-Entry Quarantine (PEQ)**

In the instance of the Australia outbreak there is some suggestion that vaccination could have masked the overt clinical presence of the equine influenza virus in horses imported from Japan. Therefore it is important that the time and testing in PEQ is considered sufficient to minimise this occurring.

The use of inactivated vaccine poses less risk than that of a live vaccine including of infecting non-vaccinated horses and or mutating to a more virulent strain. However, we note that the current minimum 14-day quarantine period is considered sufficient to ensure that the risks associated with the shedding of the virus from recently vaccinated horses is minimised

**Comments provided on behalf of the Department of Conservation by:**

**Leanne Perry-Meyer**

**Biosecurity Technical Officer**

**Biosecurity Section**

**Research, Development and Improvement Division**

**Wellington**

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Rachelle Linwood  
Import Standards Group  
MAF Biosecurity New Zealand  
Ministry of Agriculture and Forestry  
PO Box 2526  
Wellington  
5 March 2008  
Dear Rachelle,

Thank you for the opportunity to respond to the Draft Import Health Standard: Horses From Australia. I'd also like to thank MAF for the care taken to protect our shores from EI. As Australia's efforts to eradicate the virus seem to have paid off, my concern now turns to timeframes and costs. As you can appreciate, the lengthy wait for horses stranded in Australia

is increasingly expensive for horse owners.

I have a number of questions to pose with respect to the requirements in the protocol.

1. NZ has remained EI free through prudent quarantine for many years. Is there a reason for the extended period of time it's taking to instigate the same quarantine measures for Australia as have served us well to date for other countries?
2. Is there a source of vaccine - readily available - sufficient to administer to the quantity of horses you expect to be imported from Australia?
3. What will happen to horses awaiting importation if there is insufficient vaccine available?
4. Are the sufficient approved quarantine facilities available in Australia near all major export ports to cope with the expected volume of horses requiring quarantine?
5. Are there sufficient approved quarantine facilities available in NZ to cope with the anticipated volume of imported horses?
6. Sea freight is a popular, cost effective and low stress mode of transportation across the Tasman. Shipments are far less frequent than flights though. What steps have been taken to ensure that sea freighters will also have access to quarantine facilities?
7. What will happen to horses awaiting importation if there are insufficient NZ-based quarantine spaces available?
8. How long will NZ maintain a quarantine requirement, given that our consideration of this protocol coincides with Australia's announcement of the eradication of EI (29 February 2008)?
9. If Australia is able to declare itself EI free by the end of June 2008 and we plan to remove our quarantine requirement how long will it take us to put that plan in place?

Many thanks for your attention to these questions and I look forward to a speedy and sensible resolution to our ongoing border closure.

Yours sincerely,  
Petra Davidson

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Give Security U3.

Dear Sir/ Madam,

78 Howard St,  
Sydney,  
15<sup>th</sup> July 2008

I am writing to you concerning quarantine regulations that are being suggested with regard to horses imported from Australia.

I understand that U.S. is due to go into next month along with the rest of the country and that the foot infection happened around the 19<sup>th</sup> of December. As far as Australia is concerned they have it beaten.

The cost of what I consider ridiculous excessive quarantine measures are absolutely ridiculous and prohibitive the most people and I can't help but wonder if the whole thing is seen as just another revenue gathering opportunity. I cannot understand why horses, and vaccines those that I have

never been near any infected area or in contact with any that have should be able to be shipped or given the U3 quarantine free. A simple vaccination should be all that is needed.

Yours faithfully  
M.Pellor

(C.M. & A.T. Pellors)

(Sorry, this submission is rotated in horizontal position, technically could not insert the scan of the letter vertically)