

*Import Risk Analysis: Live
sheep and goats from
Australia*

REVIEW OF SUBMISSIONS

13 February 2009

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Import Risk Analysis:
Live sheep and goats from Australia

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Approved for general release

A handwritten signature in black ink, appearing to read 'Christine Reed'.

Christine Reed
Manager, Risk Analysis
MAF Biosecurity New Zealand

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Executive Summary

The risks of introducing disease-causing organisms through the importation of live sheep and goats from Australia were considered in a draft import risk analysis released for public consultation on 18 July 2008. Options were presented for sanitary measures to manage the risk associated with the following hazards:

- Bacillus anthracis*
- Exotic *Mycoplasma* spp.
- Exotic *Salmonella* spp.
- Leptospira* spp.
- Coxiella burnetii*
- Ticks
- Lice
- Internal parasites
- Echinococcus granulosus*
- Weed seeds, plants, and plant material

Risk management options included quarantine, sourcing of animals from trustworthy sources, treatment, vaccination, diagnostic testing, implementation of legislative principles to prevent the establishment of an agent, and a prohibition on importation of live animals as appropriate for each case. A range of options of varying stringency was suggested for each hazard.

Three submissions were received, from Federated Farmers of New Zealand, from the Meat Industry Association of New Zealand, Meat and Wool New Zealand, and Deer Industry of New Zealand, and from Fonterra.

After considering these submissions, MAFBNZ has concluded that no technical issues have been omitted that affect the conclusions of the draft import risk analysis on live sheep and goats from Australia. Therefore the conclusions of the draft import risk analysis are considered to be valid for the development of import health standards for these commodities.

The next step in this process will be for the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ to draft an import health standard alongside a document that outlines the rationale for the preferred risk management measures. These documents will then be published for a six-week period of public consultation.

1. Introduction

Risk analyses are carried out by MAF Biosecurity New Zealand under section 22 of the Biosecurity Act 1993, which lays out the requirements in regard to issuing Import Health Standards (IHSs) to effectively manage the risks associated with the importation of risk goods.

Draft risk analyses are written by the Risk Analysis Group and submitted to internal, interdepartmental, and external technical review before the draft risk analysis document is released for public consultation. The Risk Analysis Group of MAF Biosecurity New Zealand then reviews the submissions made by interested parties and produces a review of submissions document. The review of submissions identifies any matters in the draft risk analysis that need amending in the final risk analysis although the decision to implement these changes lies with an internal committee of MAF Biosecurity New Zealand. These documents inform the development of any resulting IHS by the Border Standards Group of MAF Biosecurity New Zealand for issuing under section 22 of the Biosecurity Act by the Director General of MAF on the recommendation of the relevant Chief Technical Officer (CTO).

Section 22(5) of the Biosecurity Act 1993 requires CTOs to have regard to the likelihood that organisms might be in the goods and the effects that these organisms are likely to have in New Zealand. Another requirement under section 22 is New Zealand's international obligations and of particular significance in this regard is the *Agreement on Sanitary & Phytosanitary Measures* (the "SPS Agreement") of the World Trade Organisation.

A key obligation under the SPS agreement is that sanitary and phytosanitary measures must be based on scientific principles and maintained only while there is sufficient scientific evidence for their application. In practice, this means that unless MAF is using internationally agreed standards, all sanitary measures must be justified by a scientific analysis of the risks posed by the imported commodity. Therefore, risk analyses are by nature scientific documents, and they conform to an internationally recognised process that has been developed to ensure scientific objectivity and consistency.

MAF Biosecurity New Zealand released the document *Import Risk Analysis: Live sheep and goats from Australia* for public consultation on 18 July 2008. Every step was taken to ensure that the risk analysis provided a reasoned and logical discussion, supported by references to scientific literature. The draft risk analysis was peer reviewed internally and externally and then sent for interdepartmental consultation to the Ministry of Health, the Department of Conservation and the New Zealand Food Safety Authority. Relevant comments were incorporated at each stage of this review process. The closing date for public submissions on the risk analysis was 12 September 2008.

Three submissions were received. Table 1 lists the submitters and the organisations they represent.

This document is MAF Biosecurity New Zealand's review of the submissions that were made by interested parties following the release of the draft risk analysis for public consultation. Public consultation on risk analyses is primarily on matters of scientific fact that affect the assessment of risk or the likely efficacy of any risk management options presented. For this

reason, the review of submissions will answer issues of science surrounding likelihood¹, not possibility², of events occurring. Speculative comments and economic factors other than the effects directly related to a potential hazard are beyond the scope of the risk analysis and these will not be addressed in this review of submissions.

Table 1. Submitters and Organisations Represented

Submitter	Organisation Represented/Location
David Burt	Federated Farmers of New Zealand
Tracy Galland	Meat Industry Association of New Zealand, Meat and Wool New Zealand, and Deer Industry of New Zealand
Lindsay Burton	Fonterra

¹ Likelihood: The quality or fact of being likely or probable; probability; an instance of this.

² Possible: Logically conceivable; that which, whether or not it actually exists, is not excluded from existence by being logically contradictory or against reason.

2. Review of Submissions

2.1. DAVID BURT, FEDERATED FARMERS OF NEW ZEALAND

- 2.1.1. Federated Farmers recommends ... In respect of sheep, that the importation of live sheep from Australia is prohibited. Genetic material for these species from Australia be imported by means of germplasm, with testing as necessary, to ensure that the animal diseases exotic to New Zealand and considered in the Draft Import Risk Analysis do not enter our country.

MAFBNZ response: MAFBNZ is able to consider information on benefits for New Zealand when determining the priority on the work programme for the subsequent development of import health standards for live sheep and ovine germplasm. The views expressed in submissions that germplasm import health standards provide the desired benefit of access to genetics will be taken into account during this prioritisation process.

- 2.1.2. Federated Farmers recommends ... In respect of goats, that the importation of live animals from Australia continues, with suitable control measures, in order to provide the New Zealand goat industry with genetic material that is not available by other means.

MAFBNZ response: This will be considered by the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ when drafting an IHS developed from the published risk analysis. Please also see the response to 2.1.1 above.

- 2.1.3. Federated Farmers recommends ... That the present risk assessment status of “negligible” for diseases in which *Culicoides* spp are implicated as vectors - Akabane Diseases, Bluetongue and Palyam Virus Infections – be reviewed in the light of information to be presented by the Meat Industry Association of New Zealand in their Submission.

MAFBNZ response: The submission from the Meat Industry Association, Meat and Wool New Zealand and the Deer Industry Association of New Zealand is addressed later in this document. Please see Section 2.2.

- 2.1.4. Some diseases (eg Borna disease, Louping ill and related viruses) are not “of concern” on the basis that they are classified as exotic in both New Zealand and Australia. The information on which the Australian status is based is, however, over ten years old. If there is any reason to believe this status may have since changed, particularly with regard to zoonotic hazards, then such organisms should be classified as “of concern”.

MAFBNZ response: MAFBNZ has the flexibility to modify any IHS based on this risk analysis if the exporting country is subject to an exotic disease incursion.

Veterinary certificates will be required to certify country freedom from diseases and certification issues such as these will be considered by the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ responsible for drafting any IHS based on the findings of this risk analysis.

- 2.1.5. The absence of definitions for the critical terms “negligible” and “non-negligible” is puzzling.

MAFBNZ response: Section 3.5.3 of MAFBNZ’s risk analysis procedures defines “negligible” as “*not worth considering; insignificant*” and “non-negligible” is defined as “*worth considering; significant*.”

- 2.1.6. When considering risk management, the document uses the term “could” as in “could be (an) effective ...” [eg Section 7.3.1 (Anthrax), 10.3.1 (Salmonellosis)]. The use of the word in respect of risk management is ambiguous ... This ambiguity should be removed and replaced with the word “would” where its application would prove efficacious but the choice around the use of this measure is simply being presented as an option.

MAFBNZ response: The use of the word “could” when discussing risk management options reflects the fact that no decisions regarding sanitary measures have been made at this stage of the IHS development process.

- 2.1.7. The detail around this mechanism, where human intervention is required (such as management by means of quarantine measures) is inadequate. While some information about possible risk management frameworks for specific diseases is provided, effective risk management requires that a number of processes are involved, including monitoring and verification. The document provides no information on these and other key areas. It also gives no guidance around responsibility and accountability for risk management measures. In the absence of such critical information, it is not possible to support any risk management processes that rely on quarantine measures.

MAFBNZ response: Further detail surrounding such procedures will be provided when a draft IHS is written based on this risk analysis. This will then be subject to public consultation for a period of six weeks when stakeholders will have an opportunity to comment on these issues. Stakeholder submissions will be reviewed before a final IHS is issued.

- 2.1.8. “In line with the MAF Biosecurity New Zealand ...risk assessment methodologies ...the following analysis is carried out”. Exposure assessment (b) is defined as “the likelihood of animals or humans in New Zealand being exposed to the potential hazard.” This may (depending on what “animals” are defined here as) be better reworded as “the likelihood of animals *or vectors* (*my emphasis*) or humans in New Zealand being exposed ...” as non-animal vectors are also capable of harbouring and transmitting biological hazards.

MAFBNZ response: The wording used in the draft risk analysis is consistent with Article 2.2.4 of the current (2008) OIE Code, which states:

Exposure assessment consists of describing the biological pathway(s) necessary for exposure of animals and humans in the importing country to the hazards (in this case the pathogenic agents) released from a given risk source, and estimating the probability of the exposure(s) occurring, either qualitatively (in words) or quantitatively (as a numerical estimate).

- 2.1.9. ... there is a substantial body of information in the scientific literature that suggests that changes in ambient temperature are likely to occur over New Zealand over the coming decades. This information could be used to assess the impact of any projected changes in vector and disease viability within New Zealand over an appropriate period – to coincide with the period between scheduled IHS reviews - and the risk analysis, and consequent IHSs could take this into account when they are developed.

MAFBNZ response: MAFBNZ risk analyses do not consider speculative events that could occur in the future, such as the possible establishment of disease vectors such as *Culicoides* spp. due to climate change.

Since 1991 New Zealand has operated an arbovirus and *Culicoides* spp. surveillance programme to provide evidence of New Zealand's disease freedom from bluetongue virus, epizootic haemorrhagic disease virus (serotype 2), Palyam (D'Aguilar) virus, and Simbu viruses. The programme consists of three components: serological survey in cattle, light trapping for *Culicoides* spp, and passive surveillance. This ongoing surveillance programme provides evidence for New Zealand's continued freedom from arboviruses and *Culicoides* spp. However, if events such as climate change result in the establishment of *Culicoides* spp. in New Zealand at some point in the future, MAFBNZ has the flexibility to then modify any IHS if appropriate.

- 2.1.10. The Federated Farmers Goats industry group would strongly oppose any suggestion that the importation of live goats from Australia be stopped. Goat numbers in New Zealand are not high and the periodic importation of overseas genes is seen as essential to retain quality flocks.

Use of germplasm has shown to be unreliable and is consequently an uneconomic option in this. In addition, goats are eco-sensitive and bucks need to adapt to their environment before becoming fully effective on properties. "Adaptation" is not possible with embryos or semen. Practical problems are also experienced with goats in the taking of semen and implantation, as well as storage. The end result is that importation of germplasm is far more costly than importation of live animals but overall provides only a 50% chance, at best, of achieving stock enhancement.

The need for appropriate measures to manage biosecurity risks is accepted but we believe that this can be achieved.

MAFBNZ response: This will be considered by the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ when drafting an IHS developed from the published risk analysis. Please also see the response to 2.1.1 above.

- 2.1.11. The assumption about the viability of *Culicoides* spp in New Zealand is disputed by the Meat Industry Association of New Zealand and Meat and Wool New Zealand. In the light of the information that they will be including in their Submission, we strongly urge that the implications of their information be assessed and that the risk status of all diseases associated with *Culicoides* spp. be re-evaluated.

MAFBNZ response: The submission from the Meat Industry Association of New Zealand, Meat and Wool New Zealand, and Deer Industry of New Zealand is evaluated in Section 2.2 below.

- 2.1.12. The analysis notes (page 26) that possums may be possible reservoir hosts of the Ross River virus and comments “the role played by possums in the persistence of the disease ... remains speculative and the role they could play in New Zealand is unknown.”

Given this uncertainty around a significant zoonotic disease, it would be prudent to err on the side of caution when assessing how the risks around this might be managed. Under such circumstances, the “non-negligible” status might be better replaced with another descriptor.

MAFBNZ response: As indicated in the draft import risk analysis, there are no records of isolation of Ross River virus from naturally infected sheep or evidence that sheep can act as reservoirs of the virus. Experimentally infected sheep may be transiently viraemic with low titres of virus but do not remain carriers of the virus. There is no evidence that sheep act as maintenance hosts. For these reasons, Ross River virus is not considered to be a potential hazard in live sheep.

- 2.1.13. The importation of live animals without restriction is inappropriate given the non-negligible risk assessment outcomes for these diseases. Similarly, a reliance on an absence of exposure to these diseases is an unacceptable risk given the potential consequences, the lack of detail around verification processes and the availability of lower risk alternatives.

MAFBNZ response: Comments on the suitability of the options presented for risk management will be considered by the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ when drafting an IHS developed from this import risk analysis.

- 2.1.14. Overall, the quarantine option is not preferred on the grounds that it is an expensive option and not an effective means of managing all the diseases under consideration.

MAFBNZ response: Please see the response to 2.1.13 above.

- 2.1.15. Treatment, whether by vaccination or by the administration of drugs (antibiotics, insecticides/acaricides or anthelmintics) could be used to manage many, but not all, of the diseases considered here.

Again, this choice is not preferred, given that a better risk management tool exists that would avoid the shortcomings inherent in this generic option.

MAFBNZ response: Please see the response to 2.1.13 above.

- 2.1.16. ... prohibition of live imports, with the importation of germplasm only, is the best option for managing the risks associated with the trade in ovine and caprine genetic material from Australia.

MAFBNZ response: Please see the response to 2.1.13 above.

- 2.1.17. The scrapie-free classification of New Zealand is of some value. Under such circumstances, it is very pleasing to note that MAF is, separately, to undertake risk analysis work around scrapie.

MAFBNZ response: Noted

2.2. TRACY GALLAND MEAT INDUSTRY ASSOCIATION OF NEW ZEALAND, MEAT AND WOOL NEW ZEALAND, AND DEER INDUSTRY OF NEW ZEALAND

2.2.1. M&WNZ, MIA and DINZ question whether the importation of live animals into New Zealand is a sensible approach given the economics of live animal shipments, particularly with regard to the importation of animals for slaughter, and the relative ease around importation of semen and embryos.

The parties would consider a broad approach which allows the importation of semen and embryos with relative ease except in exceptional circumstances and making this the preferred method of importing novel genetic material.

The parties believe that such an approach allows for a more efficient means of administering import health standards and regulating the import of live animals while reducing the risks associated with such imports and at the same time allowing an import trade to proceed.

MAFBNZ response: This will be considered by the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ when drafting any IHS developed from the published risk analysis.

As obliged under Article 3.1 of the WTO Agreement on Sanitary and Phytosanitary Measures (the SPS Agreement) the measures adopted in IHSs will be based on international standards, guidelines and recommendations where they exist, except as otherwise provided for under Article 3.3 (where measures providing a higher level of protection than international standards can be applied if there is scientific justification, or if there is a level of protection that the member country considers is more appropriate following a risk assessment).

Furthermore, MAFBNZ is able to consider information on benefits for New Zealand when determining the priority on the work programme for the subsequent development of import health standards for live sheep and ovine germplasm. The views expressed in submissions that germplasm import health standards provide the desired benefit of access to genetics will be taken into account during this prioritisation process.

2.2.2. The issues relating to BTV seem to have been addressed in the risk analysis: import of live sheep and goats from Australia, which contains more accurate information on the latitudes in which BTV is known to occur.

MAFBNZ response: Noted

2.2.3. Surveillance in New Zealand has not detected the presence of *Culicoides*. There is the possibility that incursions have been made from time to time but the midges have failed to over-winter and died out. However relatively small changes in winter

temperatures due to global climate change could allow the midges to persist and establish long term. Allowance for this possibility should be made in both risk analyses.

MAFBNZ response: As indicated in 2.1.9 above, MAFBNZ risk analyses do not consider speculative events that could occur in the future, such as the possible establishment of disease vectors such as *Culicoides* spp. due to climate change.

Since 1991 New Zealand has operated an arbovirus and *Culicoides* spp surveillance programme to provide evidence of New Zealand's disease freedom from bluetongue virus, epizootic haemorrhagic disease virus (serotype 2), Palyam (D'Aguilar) virus, and Simbu viruses. The programme consists of three components: serological survey in cattle, light trapping for *Culicoides* spp, and passive surveillance. This ongoing surveillance programme provides evidence for New Zealand's continued freedom from arboviruses and *Culicoides* spp. However, if events such as climate change result in the establishment of *Culicoides* spp. in New Zealand at some point in the future, MAFBNZ has the flexibility to then modify any IHS if appropriate.

- 2.2.4. *Culicoides* midges can be carried very long distances under the right meteorological conditions, with evidence of movement of diseases over several hundred kilometres being recorded on multiple occasions in scientific literature. As Australia is currently home to known BTV vectors, there is the possibility that those vectors could travel to NZ, given the right atmospheric conditions. We would like to see both risk analyses changed to reflect this possibility.

MAFBNZ response: Please see the response to 2.2.3 above.

2.3. LINDSAY BURTON, FONTERRA

- 2.3.1. Fonterra's position on the RA's is one of very strong support for confining the trade to that of semen and embryos. We are unable to find justification for the importation of live animal imports given that the requirements for bringing new genetic into NZ can be met by importation of germplasm without experiencing the same level of risk as that posed by live animals.

MAFBNZ response: This will be considered by the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ when drafting any IHS developed from the published risk analysis.

As obliged under Article 3.1 of the WTO Agreement on Sanitary and Phytosanitary Measures (the SPS Agreement) the measures adopted in IHSs will be based on international standards, guidelines and recommendations where they exist, except as otherwise provided for under Article 3.3 (where measures providing a higher level of protection than international standards can be applied if there is scientific justification, or if there is a level of protection that the member country considers is more appropriate following a risk assessment).

Furthermore, MAFBNZ is able to consider information on benefits for New Zealand when determining the priority on the work programme for the subsequent development of import health standards for live sheep and ovine germplasm. The views expressed in submissions that germplasm import health standards provide the desired benefit of access to genetics will be taken into account during this prioritisation process.

3. Copies Of Submissions

3.1. DAVID BURT, FEDERATED FARMERS OF NEW ZEALAND

1. Introduction

1.1 Federated Farmers welcomes the opportunity to comment on the above document published in May 2008.

1.2 Federated Farmers is an industry organisation that has a long history of representing the interests of rural farming communities throughout New Zealand.

1.3 The Federation aims to add value to its members farming business. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment;
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

2. The Draft Import Risk Analysis re-examines, and asks for comments on, the risks associated with the importation of live sheep and goats from Australia and presents options for the management of the identified risks.

3. Federated Farmers recommends:

I. In respect of sheep, that the importation of live sheep from Australia is prohibited. Genetic material for these species from Australia be imported by means of germplasm, with testing as necessary, to ensure that the animal diseases exotic to New Zealand and considered in the Draft Import Risk Analysis do not enter our country.

II. In respect of goats, that the importation of live animals from Australia continues, with suitable control measures, in order to provide the New Zealand goat industry with genetic material that is not available by other means.

III. That the present risk assessment status of “negligible” for diseases in which *Culicoides* spp are implicated as vectors - Akabane Diseases, Bluetongue and Piryam Virus Infections – be reviewed in the light of information to be presented by the Meat Industry Association of New Zealand in their Submission.

IV. That consideration is given to whether the description of the “exposure assessment” part of the departmental risk assessment methodology would be improved by rewording to include vectors.

V. That the use of “could” in a risk management context be reviewed to prevent ambiguities and possible misinterpretations.

VI. That consideration is given to defining the key terms “negligible” and “non-negligible” to aid in the transparency of the risk analysis process.

VII. That the department investigate whether the Risk Analysis process can be “future proofed” to some extent by consideration of scientific evidence around climate change insofar as such changes provide a mechanism to predict future vector and disease viability.

4. General comments on matters mentioned in the document:

4.1 Preliminary Hazard List [Section 2.3.1]

It is important that this step is based on current information. Some diseases (eg Borna disease, Louping ill and related viruses) are not “of concern” on the basis that they are classified as exotic in both New Zealand and Australia. The information on which the Australian status is based is, however, over ten years old. If there is any reason to believe this status may have since changed, particularly with regard to zoonotic hazards, then such organisms should be classified as “of concern”.

4.2 Terminology

The absence of definitions for the critical terms “negligible” and “non-negligible” is puzzling. The apportioning of hazards according to this classification during the risk assessment process determines whether or not they are further considered. In the absence of any definitions, it is difficult to avoid the inference that the risk management process as currently performed is *ad hoc* and therefore potentially flawed. [If this were not the case, then there must be some agreement within Biosecurity New Zealand at least, as to what these terms mean and if this is the case, then it follows that the terms are capable of being defined.]

4.3 A comment on the language used in the “Risk Management Options” sections of the document

When considering risk management, the document uses the term “could” as in “could be (an) effective ...” [eg Section 7.3.1 (Anthrax), 10.3.1 (Salmonellosis)]. The use of the word in respect of risk management is ambiguous. In this context it can mean either:

- Its application in a risk management context is optional or
- Its use may or may not be effective in managing the hazard when it is applied.

This ambiguity should be removed and replaced with the word “would” where its application would prove efficacious but the choice around the use of this measure is simply being presented as an option.

4.4 Risk management mechanism(s)

The detail around this mechanism, where human intervention is required (such as management by means of quarantine measures) is inadequate. While some information about possible risk management frameworks for specific diseases is provided, effective risk management requires that a number of processes are involved, including monitoring and verification. The document provides no information on these and other key areas. It also gives no guidance around responsibility and accountability for risk management measures.

In the absence of such critical information, it is not possible to support any risk management processes that rely on quarantine measures.

4.5 Risk Analysis [Section 2.3.2]

“In line with the MAF Biosecurity New Zealand ...risk assessment methodologies ...the following analysis is carried out”. Exposure assessment (b) is defined as “the likelihood of animals or humans in New Zealand being exposed to the potential hazard.”

This may (depending on what “animals” are defined here as) be better reworded as “the likelihood of animals *or vectors* (*my emphasis*) or humans in New Zealand being exposed ...” as non-animal vectors are also capable of harbouring and transmitting biological hazards.

4.6 A general point about “future-proofing” the risk analysis process

This risk analysis information will be used to inform and develop Import Health Standards (IHS). In the interests of avoiding the waste of publicly funded resources in unnecessarily amending these Standards, it is suggested that consideration is given to “future-proofing” the risk analysis process.

As an example, there is a substantial body of information in the scientific literature that suggests that changes in ambient temperature are likely to occur over New Zealand over the coming decades. This information could be used to assess the impact of any projected changes in vector and disease viability within New Zealand over an appropriate period – to coincide with the period between scheduled IHS reviews - and the risk analysis, and consequent IHSs could take this into account when they are developed.

5. Risk considerations around the importation of Goats from Australia

The Federated Farmers Goats industry group would strongly oppose any suggestion that the importation of live goats from Australia be stopped. Goat numbers in New Zealand are not high and the periodic importation of overseas genes is seen as essential to retain quality flocks.

Use of germplasm has shown to be unreliable and is consequently an uneconomic option in this. In addition, goats are eco-sensitive and bucks need to adapt to their environment before becoming fully effective on properties. “Adaptation” is not possible with embryos or semen. Practical problems are also experienced with goats in the taking of semen and implantation, as well as storage. The end result is that importation of germplasm is far more costly than importation of live animals but overall provides only a 50% chance, at best, of achieving stock enhancement.

The need for appropriate measures to manage biosecurity risks is accepted but we believe that this can be achieved.

6. Risk considerations around specific diseases associated with the importation of Sheep from Australia

6.1 Diseases considered as presenting a “negligible risk”

6.1.1 *Diseases in which Culicoides spp are implicated as vectors: Akabane Diseases [Section 3 (pp 14 – 17)], Bluetongue [Section 4 (pp 18 – 21)], Palyam Virus Infections [Section 5 (pp 22 - 24)]*

These diseases are not classified as hazards because *Culicoides* spp are thought not to be present in New Zealand (pp 16, 20, 23) so the viruses could not become established here. The assumption about the viability of *Culicoides* spp in New Zealand is disputed by the Meat Industry Association of New Zealand and Meat and Wool New Zealand. In the light of the information that they will be including in their Submission, we strongly urge that the

implications of their information be assessed and that the risk status of all diseases associated with *Culicoides* spp. be re-evaluated.

6.1.2 Ross River and Barmah Forest Virus Infections [Section 6]

The analysis notes (page 26) that possums may be possible reservoir hosts of the Ross River virus and comments “the role played by possums in the persistence of the disease ... remains speculative and the role they could play in New Zealand is unknown.”

Given this uncertainty around a significant zoonotic disease, it would be prudent to err on the side of caution when assessing how the risks around this might be managed. Under such circumstances, the “non-negligible” status might be better replaced with another descriptor.

6.2 Diseases considered to present “non-negligible” risks

A number of diseases are designated as being in this category. The diseases are Anthrax [Section 7], Mycoplasmas [Section 9], Salmonellosis [Section 10], Leptospirosis [Section 11], Q fever [Section 12], Ticks [Section 14], Lice – *Linognathus africanus* [Section 15*], Internal parasites [Section 17], Hydatidosis [Section 18*] and Weed Seeds, Plants and Plant Materials [Section 19].

* The internal numbering of these sections contains some errors.

In all these instances, a hazard identification classification outcome as a potential disease combined with a non-negligible risk assessment status has resulted in justification for risk management measures being taken.

Risk management options for these diseases are given, variously, as:

- Importation of animals with or without some controls pertaining to (lack of) exposure to disease organisms.
- Quarantine prior to shipment, with or without testing for disease states checking for evidence of disease.
- Disease treatment by (eg) vaccination or with prophylactic antibiotics.
- Prohibiting the importation of live animals with only germplasm (screened for disease or otherwise) permitted to be imported.

The OIE Terrestrial Animals Code favours the options of clinical absence of disease signs/vaccination/quarantine for Anthrax and Mycoplasmas. There is no guidance in the Code around animal importation with respect to Salmonellosis, Leptospirosis, Q Fever, Ticks, Lice, Internal Parasites and Weed Seeds, Plants and Plant Materials.

Considering these four options:

1. Importation of live animals

The importation of live animals without restriction is inappropriate given the non-negligible risk assessment outcomes for these diseases. Similarly, a reliance on an absence of exposure to these diseases is an unacceptable risk given the potential consequences, the lack of detail around verification processes and the availability of lower risk alternatives.

2. Quarantine

The use of this mechanism is presented as an option for the risk management of all the above diseases, with the exception of Hydatidosis. Many of the diseases considered would also

require the use of additional measures in conjunction with the quarantine process, from testing blood (eg Mycoplasmas, Q Fever) or faecal (eg Salmonellosis, Internal Parasites) samples to a more intensive management regime involving bedding (Ticks, Weed Seeds Plants and Plant Materials).

This mechanism is ineffective in managing Hydatidosis and has potentially limited efficacy for the management of Salmonellosis, Ticks and Weed Seeds, Plants and Plant Material

Overall, the quarantine option is not preferred on the grounds that it is an expensive option and not an effective means of managing all the diseases under consideration.

3. Disease treatment

Treatment, whether by vaccination or by the administration of drugs (antibiotics, insecticides/acaricides or anthelmintics) could be used to manage many, but not all, of the diseases considered here.

Again, this choice is not preferred, given that a better risk management tool exists that would avoid the shortcomings inherent in this generic option.

4. Prohibition of live animal imports with importation of germplasm only

The use of this option would, with the addition of testing as required (eg for Salmonella, Q Fever, Mycoplasmas, Leptospirosis) would provide an effective means of managing the risks associated with the diseases considered.

For this reason, prohibition of live imports, with the importation of germplasm only, is the best option for managing the risks associated with the trade in ovine and caprine genetic material from Australia.

7. Additional matters: Scrapie

The scrapie-free classification of New Zealand is of some value. Under such circumstances, it is very pleasing to note that MAF is, separately, to undertake risk analysis work around scrapie.

3.2. TRACY GALLAND MEAT INDUSTRY ASSOCIATION OF NEW ZEALAND, MEAT AND WOOL NEW ZEALAND, AND DEER INDUSTRY OF NEW ZEALAND

1. Introduction

1.1 Meat & Wool New Zealand (M&WNZ), the Meat Industry Association (MIA) and Deer Industry New Zealand (DINZ) welcome the opportunity to make a submission on the document: “Import risk analysis: live cattle from Australia, Canada, the European Union, the United States of America”

1.2 M&WNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all beef, sheep and goats slaughtered in New Zealand, and on wool sold. M&WNZ’s activities aim to increase preference for New Zealand beef, sheep, goat meat and wool internationally and domestically; to maintain and extend trade access for New Zealand red meat and wool; and to fund research and development to help improve the profitability of New Zealand farmers.

1.3 M&WNZ’s contact for this submission is:

Ben O’Brien
Meat & Wool New Zealand
P O Box 121
Wellington
Phone: (04) 474 0839
Fax: (04) 474 0800
Email: Ben.O’Brien@meatandwoolnz.com

1.4 The Meat Industry Association of New Zealand Inc (MIA) is a voluntary trade association representing New Zealand meat processors, marketers and exporters. It is an incorporated society (owned by members) that represents companies’ supplying the majority of New Zealand sheep meat exports and all beef exports.

1.5 MIA’s contact for this submission is:

Tracy Galland
Meat Industry Association
P.O Box 345
Wellington
Phone: (04)
Fax: (04) 473 1731
Email: Tracy.Galland@mia.co.nz

1.6 DINZ is the levy funded industry-good body established under the Deer Industry New Zealand Regulations (2004). One of its key functions is to promote and assist the development of the deer industry in New Zealand. Levies are collected on the products of velvet antler and venison. For venison, levies are paid on a share basis between deer farmers and venison processors and marketers. For velvet, levies are paid by velvet producers.

1.7 DINZ’s contact for this submission is:

Mark O'Connor
Deer Industry New Zealand
P.O Box 10702
Wellington
Phone: (04) 473 4500
Fax: (04) 472 5549
Email: Mark.OConnor@deernz.org

2.0 General comments

2.1 M&WENZ, MIA and DINZ question whether the importation of live animals into New Zealand is a sensible approach given the economics of live animal shipments, particularly with regard to the importation of animals for slaughter, and the relative ease around importation of semen and embryos.

2.2 The parties would consider a broad approach which allows the importation of semen and embryos with relative ease except in exceptional circumstances and making this the preferred method of importing novel genetic material.

2.3 The parties believe that such an approach allows for a more efficient means of administering import health standards and regulating the import of live animals while reducing the risks associated with such imports and at the same time allowing an import trade to proceed.

2.4 The parties would be happy to discuss such an approach at MAF's convenience.

2.5 There are several issues with information contained within the risk analysis: Import of live cattle from Australia, Canada, the European Union and the United States of America. These primarily are concerned with the Bluetongue disease virus (BTV); however there are other discrepancies also.

2.6 Much of the information given with relation to BTV, especially in relation to its known vector the midge *Culicoides* spp. is inaccurate and out of date.

2.7 These inaccuracies call into question the validity of the remaining risk analyses carried out in the document, and the validity of the document as a whole.

2.8 The risk analysis also contains statements about the importation of cattle from Australia in relation to Bovine Viral Diarrhoea virus (BVDV2) that are unjustified in their conclusions.

2.9 The issues relating to BTV seem to have been addressed in the risk analysis: import of live sheep and goats from Australia, which contains more accurate information on the latitudes in which BTV is known to occur.

2.10 However the issues raised in this submission relating to the likelihood of *Culicoides* spp. being found in NZ should be more accurately reflected in both risk analyses.

3. Specific comments

3.1 Bluetongue

The risk analysis “import of live cattle from Australia, Canada, the European Union and the United States of America” states that the vector for bluetongue is *Culicoides* spp. (midges), and that “[bluetongue] is absent in southern hemisphere countries south of 34° south, including New Zealand, and northern hemisphere countries north of 50° north (OIE 2006).”

However, the current OIE Terrestrial Animal Health code makes no such statement. Rather it says: “The global BTV distribution is currently between latitudes of approximately 53°N and 34°S but is known to be expanding in the northern hemisphere.” It is not possible to check the wording of the 2006 version of the Code Chapter as this is no longer available online. The risk analysis should be changed to reflect this.

We would also recommend that the above statement from the risk analysis be reworded so as to more accurately reflect the statement in the OIE code, which simply states the known distribution of BTV, rather than categorically stating BTV to be absent in certain parts of the world.

This issue has been addressed in the second import risk analysis “import of live sheep and goats from Australia”, which more accurately states: “It is absent in southern hemisphere countries south of 34° south, including New Zealand, and northern hemisphere countries north of 53° north”. Surveillance in New Zealand has not detected the presence of *Culicoides*. There is the possibility that incursions have been made from time to time but the midges have failed to over-winter and died out. However relatively small changes in winter temperatures due to global climate change could allow the midges to persist and establish long term. Allowance for this possibility should be made in both risk analyses.

The risk analyses also make numerous notes of cattle remaining viraemic for “up to 50 days”. The OIE code states that the infective period for BTV “shall be 60 days”.

It is noted that there are 24 serotypes of BTV. Serotype 8 is recognised as an important pathogen of cattle as well as sheep, and emerged unexpectedly in the Netherlands in 2006. The virus was of sub-Saharan origin, and the method by which it reached northern Europe is unclear. *Culicoides* midges can be carried very long distances under the right meteorological conditions, with evidence of movement of diseases over several hundred kilometres being recorded on multiple occasions in scientific literature. As Australia is currently home to known BTV vectors, there is the possibility that those vectors could travel to NZ, given the right atmospheric conditions. We would like to see both risk analyses changed to reflect this possibility.

The risk analysis “import of live cattle from Australia, Canada, the European Union and the United States of America” is out of date with respect to Bluetongue virus on many counts, and this throws in to doubt the validity of the rest of the document. We would like to see the document thoroughly revised so as to more accurately reflect the current situation regarding BTV, and indeed all other diseases mentioned.

The following sections refer exclusively to the risk analysis: “import of live cattle from Australia, Canada, the European Union and the United States of America”

3.2 Bovine Virus Diarrhoea

In section 14.1.4, on the epidemiology of Bovine Viral Diarrhoea virus, it is stated that “BVDV2 has not been described in Australia”. Section 14.3.1 Risk management options then goes on to say that “Animals could be imported from countries in which BVDV2 does not occur (Australia) without testing or quarantine”. The first statement does not justify the second, in that there is no scientific evidence given to prove that BVDV2 does not occur in Australia. It is known that mucosal disease does exist in Australia, which may suggest that BVDV2 is present. The IRA should give more scientifically accurate consideration of BVDV2 in relation to importation from Australia.

3.3 Other Issues

In addition to these specific issues relating to Bluetongue, there are also numerous discrepancies between introductory data and that contained in the body of the report. For example, in Table 1, the following diseases are listed as not notifiable to the OIE:

- Aujeszky’s disease virus
- Bovine virus diarrhoea virus
- Crimean Congo haemorrhagic virus
- West Nile disease virus

When in fact all four are notifiable to the OIE, and are listed as such in their respective risk analyses in the body of the document.

4. Conclusion

M&WNZ, MIA and DINZ all support a robust, scientific approach to risk analyses. The points raised above call into question whether this has in fact been the case with these risk analyses, and as a result we must question the validity of these analyses.

Therefore M&WNZ, MIA and DINZ are not able to support the conclusions given in the current risk analysis and would wish to see further improvements to reflect more accurately the risks posed.

Both M&WNZ and the MIA would be prepared to participate in discussions around streamlining the HIS process along the lines proposed in paragraphs 2.1 to 2.4 in this submission.

3.3. LINDSAY BURTON, FONTERRA

Howard

Thanks for emails re below and apologies for delays in getting back to you. I have been party to the content of the of the MIA/M&W submission. Fonterra's position on the RA's is one of very strong support for confining the trade to that of semen and embryos. We are unable to find justification for the importation of live animal imports given that the requirements for bringing new genetic into NZ can be met by importation of germplasm without experiencing the same level of risk as that posed by live animals. Could you take this into consideration when considering the RAs please.

Kind regards

Lindsay