# Chapter 6

### Committee views and recommendations

- 6.1 The devastating impact of the 2016 white spot disease outbreak on farmers and seafood industries in Queensland has raised particular concerns over the biosecurity controls for preventing aquatic disease incursions into the country. It has brought to the fore a number of serious concerns regarding the adequacy of Australia's biosecurity systems and import controls.
- 6.2 Some progress has been made since the outbreak in developing a more effective import regime for raw prawns and prawn products. This chapter examines some of this progress, while also providing the committee's views and recommendations on a range of issues that have arisen as a result of the WSD outbreak.

### **Impact on industry**

- 6.3 The committee was troubled to hear of the devastating impact that white spot has had on the Logan River prawn farms. The farms have effectively been shut down for two years, to help ensure eradication of WSSV and to implement updated biosecurity controls.
- During a site visit to the Logan River area in June 2017, the committee saw for itself the devastating impact of white spot on local farmers. The Logan River prawn farmers will likely experience long-term and significant financial impacts because of WSD. In addition, the farmers will continue to suffer a great personal cost as a result of the disease outbreak, given the direct impact it has had on their livelihoods.
- 6.5 Similar experiences were faced by the commercial sector in the Logan River and Moreton Bay areas. The commercial operators have been severely impacted by the movement control order still in place around Moreton Bay. These operators have been unable to send their products into more lucrative markets, and have subsequently suffered both financially and personally.
- 6.6 Some submitters expressed concerns regarding the biosecurity measures in place on some prawn farms. However, the committee notes that prawn farms will be implementing improved biosecurity measures before recommencing production in 2018. The committee encourages the application of the best possible biosecurity measures on farms. While there may be financial implications in doing so, improved biosecurity controls will help to prevent a similar outbreak occurring once the farms recommence operations, and will assist farmers to restore the reputation of Queensland farmed prawns.

# Departmental response to outbreak

### Queensland response

- 6.7 The committee commends the work of QDAF in responding to the disease outbreak and containing the spread of white spot as much as was feasible. The committee notes that it was a Queensland Government responsibility to respond to the disease incursion, yet it was actions by the Commonwealth at the border that may have led to the disease incursion in the first place. This placed a significant burden on Queensland, both physically and financially, that it might not have otherwise had to contend with.
- 6.8 QDAF advised the committee of its interest in 'mitigating the impacts of future biosecurity incursions'. QDAF was seeking ways to 'identify further areas for improvement in both our biosecurity systems at the state level and the way we fit into the Commonwealth and national arrangements with other state and territory jurisdictions'. <sup>1</sup>
- 6.9 To that end, a number of submitters identified ways in which the Queensland Government response could be improved.
- 6.10 In his report into the incident, Dr Diggles examined the communication between the Logan River prawn farmers and Queensland Government biosecurity staff. Dr Diggles observed that in some instances, communication with farmers was lacking, with some farmers feeling they were operating in an 'information vacuum'. Timelier biosecurity advice to farmers at the earliest stages may have reduced infection risks.<sup>2</sup>
- 6.11 Additionally, farmers found it stressful that many instructions to them from biosecurity staff were verbal, and were not followed up by written documentation. Dr Diggles stated that:

The only thing worse than no information is misinformation which often happened when verbal instructions dominated and the response strategy appeared to vary from day to day or hour by hour. Clearly this is not satisfactory and in the future it is important that relevant documentation is provided to farmers as promptly as possible and written (hard copy) situation updates are also provided to farmers on a regular, predictable

Dr Elizabeth Woods, Queensland Department of Agriculture and Fisheries, *Proof Committee Hansard*, 27 June 2017, p. 19.

<sup>2</sup> Dr Ben Diggles, Field observations and assessment of the response to an outbreak of White Spot Disease (WSD) in Black Tiger Prawns (Penaeus monodon) farmed on the Logan River in November 2016, Fisheries and Research Development Corporation, 21 February 2017, p. 41.

basis. The urgency for eradication should in no way be used as an excuse to keep farmers in the dark.<sup>3</sup>

- 6.12 Dr Diggles was also of the view that there was limited availability of biosecurity field staff with specialist aquatic animal training, which may have hindered the transfer of appropriate information to decision-makers higher up the chain of command. It was argued that trained officers would allow for 'more precise decision making and more rapid adaptation to changing situations'.<sup>4</sup>
- 6.13 The NSIA called for relevant documentation to be provided by biosecurity officers to farmers and fishers promptly, in the event of a disease incursion. The NSIA further stated that situation updates should be provided on a regular and predictable basis, to improve communication mechanisms.<sup>5</sup>

#### DAWR communication

- 6.14 The committee received overwhelming evidence of a communication failure on the part of federal biosecurity authorities.
- 6.15 The evidence shows that DAWR was aware that WSSV was in the Australian retail sector at elevated levels throughout most of 2016. The relevant officers at the federal level failed to properly notify their jurisdictional counterparts, industry stakeholders or prawn farmers of the heightened risk of white spot disease coming into Australia.
- 6.16 Further, it appears to the committee that during the development of the 2009 IRA, there was insufficient acknowledgment by federal authorities of concerns raised at a jurisdictional level. The concerns raised by jurisdictions do not appear to have been incorporated into the IRA or actioned in any way. This is particularly true for Queensland, where testing clearly showed evidence of white spot at significant levels as early as 2006.
- 6.17 With regard to Operation Cattai, the committee appreciates the need for DAWR to undertake its investigations with some level of confidentiality. However, it is apparent to the committee that effective and timely communication with industry and state government stakeholders was lacking in this instance.

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<sup>3</sup> Dr Ben Diggles, Field observations and assessment of the response to an outbreak of White Spot Disease (WSD) in Black Tiger Prawns (Penaeus monodon) farmed on the Logan River in November 2016, Fisheries and Research Development Corporation, 21 February 2017, p. 41.

<sup>4</sup> Dr Ben Diggles, *Field observations and assessment of the response to an outbreak of White Spot Disease (WSD) in Black Tiger Prawns* (Penaeus monodon) *farmed on the Logan River in November 2016*, Fisheries and Research Development Corporation, 21 February 2017, pp. 40-41.

<sup>5</sup> National Seafood Industry Alliance, *Submission 16*, p. 6.

- 6.18 DAWR acknowledged as much, when it suggested that in the event of a similar incident in future, it would advise its state counterparts of the outcomes of its investigations.
- 6.19 Better communication could have seen the increasing prevalence of WSSV addressed in a more timely and cohesive manner. It is the committee's view that such communication could have occurred without undermining the integrity of ongoing DAWR investigations. DAWR should ensure that it implements procedures that allow it to communicate effectively and confidentially with jurisdictional counterparts, to alert them to heightened risks of disease incursion.

6.20 The committee recommends that the Department of Agriculture and Water Resources introduce procedural guidelines that allow it to communicate confidentially with jurisdictional counterparts while pursuing biosecurity investigations. Such procedures should protect the integrity of investigations, while alerting other jurisdictions to heightened disease risk.

## **Enhanced import conditions**

- 6.21 The demand for seafood in Australia cannot be met from domestic supply, requiring significant volumes of seafood to be imported from overseas. The prawn import suspension, implemented from January to July 2017, therefore had a dramatic effect on the distribution of prawns to and around Australia, and on seafood importers and retailers
- 6.22 The committee was concerned by the various amendments made to the original import suspension (particularly the amendments in May 2017) to allow the import of uncooked prawns which had been marinated, for human consumption. The changes were made despite the cause of the WSD outbreak remaining unknown.
- 6.23 The enhanced import conditions, in place since July 2017, combine uncooked and marinated raw prawn into the same product class for biosecurity purposes, with pre-export and at the border testing, and 100 per cent seals intact inspections. The committee expects that combining raw and marinated prawns into the same product category will go some way to addressing stakeholder concerns.
- 6.24 However, while imports have resumed under these enhanced conditions, there remains a movement control order in place in the Moreton Bay area. These orders mean that while international seafood product can enter Australia, prawns, yabbies and marine worms from Moreton Bay cannot leave certain restricted areas in Queensland. The committee heard evidence of the devastating impact the orders have had on some Queensland industries.
- 6.25 The committee understands that the movement control order is in place to help prevent the potential spread of WSSV. However, the resumption of imports has created an unequal playing field for Moreton Bay seafood operators. The committee

encourages the lifting of the movement control order as soon as practicable, once it is deemed safe to do so.

### Product recall powers

6.26 In its submission to the committee, and in evidence throughout the inquiry, DAWR called for legislative changes to the *Biosecurity Act 2015*, with regard to product recall powers. The changes would allow for a quicker and more comprehensive response if a similar biosecurity incident were to occur.<sup>6</sup>

### 6.27 DAWR argued that:

A key change includes considering a potential new power providing the Director of Biosecurity with the ability to issue a general secure direction for a specified good or class of goods and a requirement for persons in possession of those goods to provide information to the department. Similar to a 'recall' power, a secure and advise power would enable the Director of Biosecurity to prevent the further movement of biosecurity risk goods and to gather information to support a targeted operational response to control the risk.<sup>7</sup>

6.28 The committee notes that the decision to suspend the import of raw prawns and prawn products was the first use of the import suspension powers in the *Biosecurity Act 2015*. Accordingly, the committee is encouraged that DAWR has examined the WSD response and proposed legislative changes to improve the biosecurity policy framework. The committee recommends that DAWR progress these statutory changes.

### **Recommendation 2**

6.29 The committee recommends that the Minister for Agriculture and Water Resources introduce amendments to the *Biosecurity Act 2015*, which provide the Director of Biosecurity with appropriate secure and advise powers in relation to specified goods or classes of goods.

### **Diagnostic testing**

### Enhanced testing regime

6.30 The enhanced testing regime implemented by AAHL raised serious concerns for the committee. The committee recognises the need for rigorous testing procedures. However, the enhanced testing regime has created uncertainty for all stakeholders and added to the confusion around implementation of the import suspension in the first

Department of Agriculture and Water Resources, *Submission 9*, p. 47; *Committee Hansard*, 28 March 2017, pp. 10-11; Correspondence received from the Department of Agriculture and Water Resources, 11 July 2017.

<sup>7</sup> Department of Agriculture and Water Resources, *Submission 9*, p. 47.

- half of 2017. The conflicting test results between laboratories also raised the possibility of false positives and false negatives.
- 6.31 It is clear that AAHL took a conservative approach in the detection of white spot. While this may have prevented infected product entering Australia, it may also have resulted in the destruction of product that was unlikely to be infectious.
- 6.32 Importers in particular emphasised the adverse impacts of enhanced testing on their businesses. They informed the committee that imported prawn products testing negative for white spot at an approved laboratory often returned positive WSSV results at AAHL. As a result, substantial volumes of raw prawns were held in biosecurity control with orders to re-export or destroy the product, at great cost to importers and the broader seafood distribution chain.
- 6.33 DAWR explained to the committee that AAHL's confirmatory testing did highlight 'inconsistencies' between laboratories. The committee observes that DAWR has since taken steps to address these inconsistencies by introducing standardised testing procedures across laboratories.
- 6.34 The committee encourages DAWR to continue this important work, to ensure that biosecurity risks are adequately addressed, with all laboratories operating under the same arrangements. Should a similar biosecurity event occur in future, the committee urges DAWR to consider how diagnostic testing may be best applied in the circumstances, to reduce confusion and disruption for stakeholders.

### **Pre-export** testing

- 6.35 The new regime of pre-export testing will provide greater certainty to exporting countries and importers that the product entering Australia is free from white spot and other crustacean diseases.
- 6.36 The committee was encouraged to hear of these positive steps taken by DAWR to address concerns with WSSV testing, especially in providing training and assistance to overseas trading partners. The committee hopes a uniform approach to both testing methods and the interpretation of results will help prevent the importation of infected product, and assist biosecurity to better detect white spot at the border.
- 6.37 However, the committee also notes that the competent authorities from exporting countries must certify their products are free from WSSV, based on current OIE testing methods. The committee encourages the department to continue its discussions with the OIE and with trading partners, to ensure the diagnostic tests used globally are of an adequate standard to detect WSSV in prawn products coming to Australia. Appropriate overseas testing will play a key role in keeping WSSV out of Australia in future.
- 6.38 DAWR advised of planned visits to major prawn exporting countries, to 'discuss aquatic animal health controls and systems in place to manage the biosecurity risk of prawns and prawn products exported to Australia'. DAWR officials visited

Thailand in June 2017 and Malaysia in September 2017, with all other major trading partners to be visited within the next year (to mid-2018).<sup>8</sup>

6.39 Given the steps already taken to improve the diagnostic testing regime for our trading partners, the committee recommends that DAWR implement a formal and ongoing training program for diagnostic testing in trading nations. Such a program would help reassure exporting countries that prawn products will be more likely to be accepted upon arrival in Australia. This will in turn give confidence to importers and the supply chain.

#### **Recommendation 3**

6.40 The committee recommends that the Department of Agriculture and Water Resources implement an ongoing diagnostic testing training program for aquatic diseases with international trading partners, to assist those countries in improving their scientific disease testing capabilities, in line with the testing utilised in Australian laboratories.

### **Import Risk Analysis**

- 6.41 It is apparent to the committee that the finalisation process for the IRA took far too long. It was nearly ten years between the first release of a draft IRA in 2000, to formal adoption of a final IRA in 2009.
- 6.42 During this time, Australia continuously implemented interim biosecurity control measures, which were in fact long-term and in place for significant periods of time. These interim measures created ongoing angst and concern amongst Australia's major seafood trading partners.
- 6.43 Australia's trading partners also raised numerous concerns regarding the scientific basis of the IRA, and suggested that the risk management measures in the IRA were overly restrictive.
- 6.44 While the committee appreciates that these processes take time, the absence of final agreement for such a long period only increased the risk of diseases entering Australia at the border. Furthermore, DAWR must now restore the confidence of trading partner nations in the context of even more stringent conditions, at a time when confidence in Australia's biosecurity controls is already in question.

#### Disease pathways

6.45 As was emphasised throughout the inquiry, the priority of Australia's biosecurity framework is to reduce the risk of disease to a low level, but not to completely eliminate the risk. As noted by Dr Elizabeth Woods of QDAF, regarding the presence of diseases in Australia:

<sup>8</sup> Department of Agriculture and Water Resources, *Submission 9.1*, 24 August 2017, p. 4.

at some level all of them represent some sort of failure of perfect border control, but I guess the reality is that perfect control is not possible, and it is not in fact the aspiration of our system.<sup>9</sup>

- 6.46 The committee acknowledges that as yet there is no definitive answer as to how the 2016 WSD outbreak occurred, and how WSSV entered Australia. While both DAWR and the Queensland Government are continuing genetic testing, the answer to this question may never be known.
- 6.47 However, it appears to the committee that some of the potential disease pathways under consideration are more plausible than others. For example, while WSSV may have already been present in Australia at very low levels, a lack of ongoing surveillance of wild prawn populations to date makes it difficult to affirm this pathway as the cause of the outbreak. Further, the absence of any earlier outbreaks makes this pathway less likely.
- 6.48 Based on the evidence before it, the committee suggests that aquatic feed, diseased broodstock, infected farming equipment and human activity are also less likely to be the cause of the outbreak. There are inherent risks associated with each of these potential pathways. Nonetheless, at this stage there appears to be a lack of substantial evidence against these pathways being the cause of the 2016 outbreak.

### Imported raw prawns used as bait

- 6.49 The committee holds the view that the use of imported, infected raw prawns as bait and burley is one of the more feasible pathways to WSSV entering Australia. There is significant evidence that recreational fishers were using infected raw prawns as bait in the Logan River area, and evidence that such practices have been ongoing for some time.
- 6.50 Further, Operation Cattai proved that some importers were intentionally subverting biosecurity controls and importing infected prawn products into Australia. When the findings of Operation Cattai are combined with the evidence of imported raw prawns being used as bait by fishers, it becomes more apparent that this pathway requires serious consideration.
- 6.51 The committee was alarmed to see that in some instances, the interim IRA measures implemented between 2000 and 2009 were a response to increasing evidence that imported prawns intended for human consumption were being used as bait. The IRA noted that in 2004 and 2006, WSSV was detected in imported frozen uncooked prawns intended for human consumption, in a number of jurisdictions. The IRA put the likelihood of WSSV release via raw prawns intended for human consumption as 'high'. This indicates that DAWR has been aware of this disease import pathway for a considerable period.

<sup>9</sup> Dr Elizabeth Woods, Queensland Department of Agriculture and Fisheries, *Committee Hansard*, 27 June 2017, p. 25.

6.52 A number of submitters, particularly from the prawn industry, emphasised that they had repeatedly called on DAWR to strengthen import controls for prawns and prawn products, to little avail. It is clear to the committee that the IRA needs urgent review with regard to this pathway.

### Regulation of bait usage

- 6.53 It appears that there may be little appreciation or knowledge within the recreational fishing community that frozen, raw imported prawns should not be used as bait, despite the IRA requirements that such products are labelled as for human consumption only, and that they are not to be used as bait. The committee was informed that the use of raw imported prawns as bait is publically encouraged at some fishing outlets and in recreational fishing publications.
- 6.54 The point was made to the committee that it was very difficult to police the use of imported prawns as bait, and to educate consumers on the risks of doing so. The use of prawns in this way was driven in particular by the lower cost of prawns intended for human consumption, when compared with bait-specific product. Additionally, a number of submitters noted that there was no way to control the end use of seafood products, once sold at the retail level.
- 6.55 However, the committee considers that some action can be taken to try and address these issues. The committee recommends that DAWR consider regulations for the clearer labelling of imported, frozen, raw prawns for human consumption. Such regulations should reflect the biosecurity concerns raised by the IRA. In particular, consideration should be given to appropriate signage at the point of sale to alert consumers that imported raw prawns are not to be used as bait.
- 6.56 Additionally, the committee recommends that the Minister for Agriculture and Water Resources and DAWR take the lead in supporting all jurisdictions in the implementation of an education campaign. The campaign should advise stakeholders of the serious risks of using imported raw prawns as bait, and should pay particular attention to the recreational fishing community.

#### **Recommendation 4**

6.57 The committee recommends that the Department of Agriculture and Water Resources consider regulations and enforcement mechanisms for the improved labelling of imported frozen raw prawns intended for human consumption. Particular consideration should be given to appropriate signage at the point of sale in the retail sector.

#### **Recommendation 5**

6.58 The committee recommends that the Minister for Agriculture and Water Resources secure the co-operation of all jurisdictions to undertake an education campaign on the risks associated with using raw prawns intended for human consumption as bait.

### Prawn imports review

- 6.59 The committee supports DAWR's review of the import conditions for prawns and prawns products, which includes a review of the 2009 IRA. A consultative approach with all industry stakeholders will go some way to ensure that the next iteration of the IRA best protects Australia's biosecurity.
- 6.60 The committee encourages the next iteration of the IRA to properly consider the various importation pathways for seafood into Australia, particularly frozen raw prawns intended for human consumption. The IRA review should include consideration of the conditions of prawn farming in the country of origin, to best understand and address potential disease import pathways. Looking beyond Australia's borders will allow DAWR to consider the processing conditions utilised by our trading partners and therefore to better understand possible importation pathways.
- 6.61 The review should also give appropriate attention to the end use of imported prawn and seafood products, and the risks such end uses present to Australia's various aquaculture industries. Biosecurity measures at the border form an important part of stopping disease incursions. However, once product passes through these controls, there is no further scope for testing, tracing or overview.
- 6.62 The committee recommends that the review give suitable consideration to the 2009 IRA, which the committee suggests needs urgent and comprehensive reconsideration. It is clear that the IRA has underestimated the risk of certain disease pathways, particularly the use of infected raw imported prawns being used as bait. Since the 2009 IRA, a number of new seafood diseases have emerged. The review should apply the best and most current scientific findings to its final outcomes.
- 6.63 Further, in undertaking the review, the committee urges DAWR to consider the views of other jurisdictions. Particularly relevant will be the views of Queensland, which raised concerns over the IRA as early as 2006. Queensland at that time also presented testing results to support its claim that the IRA needed further amendment.
- 6.64 The committee notes that DAWR has already engaged an additional 105 staff as a result of the enhanced testing regime. To ensure that the review is completed in a timely manner, and without the considerable delays experienced during development of the 2009 IRA, the committee recommends that DAWR be allocated sufficient resources to undertake the review, whether from the additional staff already retained or elsewhere.

#### **Recommendation 6**

6.65 The committee recommends that the Department of Agriculture and Water Resources urgently complete its review into the import conditions for prawns and prawn products. The review should consider updates to the 2009 Import Risk Analysis on the basis of scientific evidence and with regard to the views of other jurisdictions.

- 6.66 The committee recommends that the Secretary of the Department Agriculture and Water Resources allocate sufficient resources in order to complete the review of import conditions for prawns and prawn products as soon as is practicable.
- 6.67 The committee notes that in February 2017, the Inspector-General of Biosecurity (IGB) commenced a review into the circumstances leading to suspension of uncooked prawn imports. To date, this review has not been completed or publicly released.
- 6.68 The IGB review is examining the effectiveness of biosecurity controls and their implementation to prawn products, post-entry surveillance, the end use of imported prawn products, and areas for improvement in biosecurity risk management. Given the importance of these areas of review, the committee encourages the urgent finalisation of the IGB review, so that its findings can contribute to the IRA review at the earliest opportunity.

### Industry and stakeholder consultation

- 6.69 Throughout the inquiry, it was apparent to the committee that the seafood and aquaculture industry is diverse, with a great variety of different types of seafood farming and fishing undertaken across Australia.
- 6.70 Because of this diversity, a number of witnesses emphasised to the committee the need for a whole-of-industry seafood and aquaculture consultation group. Such a group would help to improve communication between stakeholders, and state and federal governments. This level of communication is of particular importance when considering biosecurity and determining import and product controls.
- 6.71 Dr Hone of the FRDC explained which bodies would best form part of a consultation group, and the benefits of such a group being established. Dr Hone stated:

the regulator, the agencies responsible and the industry—and that's the broad church of the industry, including the pet industry, the importers, the wild-catch sector and the commercial sector—have a forum where they can actually sit and discuss these issues and make sure that they're understanding each other's responsibilities to make sure that they've got effective systems. To us, that works best, and that trust is actually the most important part of making our systems work. <sup>11</sup>

Dr Patrick Hone, Fisheries Research and Development Corporation, *Committee Hansard*, 28 August 2017, p. 11.

See Inspector-General of Biosecurity, Current reviews, <a href="http://www.igb.gov.au/Pages/suspension-uncooked-prawn-imports.aspx">http://www.igb.gov.au/Pages/suspension-uncooked-prawn-imports.aspx</a> (accessed 28 September 2017).

- 6.72 The NSIA and NAC expressed the view that a taskforce or similar body, representing a variety of organisations, would assist the industry in directly communicating biosecurity concerns to government at a state and federal level. The NSIA and NAC provided information to the committee on which organisations could form such a taskforce. 12
- 6.73 The NAC argued that 'no-one is better placed than aquaculture seafood producers to understand the tension between the importance of engaging with external markets and adhering to and relying on effective biosecurity'. 13
- 6.74 The establishment of a consultation group or similar was also supported by importer groups. SIAA, for example, encouraged government support for a professional organisation that could both engage with government and advise and educate all importers about biosecurity.<sup>14</sup>
- 6.75 The committee was encouraged that a variety of stakeholders supported the establishment of a seafood industry consultation group. The committee encourages organisations such as QSIA, which has been contacted by the Minister for Agriculture and Water Resources, to engage fully with government and with any broader consultation groups.
- 6.76 The committee recommends that DAWR establish a consultation group that involves industry (including the wild catch sector) and scientific organisations. The consultation group would present its views and issues on biosecurity directly to the relevant state, territory and Commonwealth ministers.

6.77 The committee recommends that the Department of Agriculture and Water Resources, in collaboration with seafood and aquaculture industries, establish a seafood industry and science consultation group, which has the ability to present its views on biosecurity to relevant state, territory and Commonwealth ministers.

#### Aquatic EADRA and stakeholder consultation

6.78 The committee was pleased to hear that the development of an aquatic EADRA has been in progress since 2014, with the support of DAWR. The committee hopes the development of the aquatic EADRA continues, and the draft is released by the end of this year as forecast.

Seafood Importers Association of Australasia Inc., Submission 13, p. 35.

National Seafood Industry Alliance and National Aquaculture Council, answer to question taken on notice, 28 August 2017 (received 12 and 18 September 2017).

National Aquaculture Council, Submission 17, p. 11.

- 6.79 An aquatic EADRA will ensure there is a cohesive and appropriately funded response to any future disease outbreaks that may affect the wild catch and the commercial fishing sector.
- 6.80 Notwithstanding the significant variances within the seafood industry, for example between prawn farms and the wild catch sector, the committee is of the view that all relevant stakeholders should be part of development of the aquatic EADRA. This is despite some stakeholders being hesitant to engage with the process. The best way to ensure that industry concerns with an EADRA are presented, acknowledged and addressed is by all stakeholders being part of the development discussions.
- 6.81 The financial benefits of having an aquatic EADRA in place will be significant, should another disease incursion occur. However, the committee notes the concerns of stakeholders that the 'three thirds' funding arrangements for an EADRA may not suitably apply to all sectors of the seafood industry, particularly the wild catch sector.
- 6.82 Therefore, the committee recommends that AHA and the Aquatic Deed Working Group consider whether a more flexible funding arrangement could apply to aquaculture industries. The aquatic EADRA should consider the unique nature of the wild caught sector, and the relative size of some elements of the commercial seafood industry.

6.83 The committee recommends that in developing an aquatic Emergency Animal Disease Response Agreement, Animal Health Australia and the Aquatic Deed Working Group consider alternative options to the 'three thirds' funding arrangements.

**Senator Glenn Sterle** 

Chair