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19 February 2007

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Dear Sirs

This letter and the attached document of further comments comprise the QSIA response to your report, *Revised Draft Generic Import Risk Analysis Report for Prawns and Prawn Products*.

In general terms, QSIA supports the recommendations of this IRA, in as much as they represent more stringent safeguards than the existing regulations and are more likely to protect Australia's wild and aquaculture prawn stocks, and the broader marine environment, from the threat of exotic crustacean diseases.

QSIA also strongly believes the new recommendations should be implemented as soon as possible. There is a real and urgent threat of contamination of Australian crustacean stocks, as large quantities of uncooked prawns are currently being imported and tests have indicated a large percentage of imported uncooked prawns may be carrying diseases such as white spot syndrome virus (WSSV), Taura syndrome virus or yellowhead virus (YHV).

However, QSIA is concerned that, from our reading of the draft IRA, simply breaching prawns during processing will allow them to escape the more stringent safeguards recommended in the document.

Breaching of course will in no way reduce the viral load carried by these uncooked prawns and may not dissuade some anglers from using them as bait (especially those that have been reduced to clear as they approach their "use by" date).

These breaded prawns may also find their way into the marine environment by other means (for example, simply used as berley, fed to the fish or simply thrown into a waterway if they "go off" after being left too long without eating).

It is not difficult to imagine such an occurrence more than once across Australia, with millions of kilograms of prawns being purchased by millions of households.

QSIA is strongly of the view that no uncooked prawns should be permitted to be imported into Australia. This view is shared by one of the world's most pre-eminent institutions in shrimp disease research. A reply to a letter of enquiry revealed in part:

*"June 9, 2006"*

*As you correctly concluded, I view imported commodity shrimp/prawns as a significant and high risk to shrimp aquaculture, to aquatic ecosystems and to fisheries. My lab has published a number of papers to fill in knowledge gaps identified in government risk assessments. My lab and others have confirmed the frozen commodity shrimp/prawn products are anything but safe commodities. The awareness is increasing that there are direct pathways for disease introduction to wild or farmed shrimp/prawns with imported infected shrimp/prawns being used as bait or as waste from value added reprocessing of these products.*

*"Donald V. Lightner"*

*Professor and Director*

*OIE Reference Laboratory for Shrimp Diseases*

*Aquaculture Pathology Laboratory*

*Department of Veterinary Science and Microbiology*

On the other hand, QSIA does not raise objections to the continued importation of cooked prawns. The ready availability of imported cooked prawns demonstrably harms Australian producers (wild-catch producers and aquaculturists). The lower cost base of producers in third-world countries in particular makes these imported prawns available to wholesalers in Australia at a price that Australian producers by and large cannot match.

However, to the best of the knowledge available to the QSIA, cooked imported prawns have not been shown to carry diseases such as WSSV, TSV and YHV. Therefore, the QSIA is not raising objections to the continued importation of *cooked* prawns under current conditions.

QSIA has noted media speculation by seafood importers' representatives that -  
- "if BA gets its way and raw imports are banned" or words to that effect --  
retail prices for locally-caught whole prawns could reach \$80 a kg. QSIA regards such statements as fanciful.

Given that imported cooked prawns will continue to be available as low-cost competition for Australian prawns, it seems unlikely that prices will rise significantly.

Also, QSIA has noted statements attributed to Thai Government officials in particular indicating a threat of World Trade Organisation against Australia if the BA proposals are enacted.

QSIA trusts that Biosecurity Australia will continue to place the health of Australian prawn stocks, along with other crustacean species and the broader marine environment, ahead of more “political” arguments being mounted by opponents to the BA proposals.

The primary goal of the QSIA in this matter is to try to safeguard the health of prawn stocks. The loss of significant volumes of wild and/or farmed prawn stocks, and the associated ecological damage, would come as a severe blow to the industries that rely on these stocks.

I would be pleased to discuss this issue with you at any time, and can be contacted on [redacted]. I also would be pleased to facilitate discussions between BA personnel and QSIA staff or fishers if necessary.

Sincerely

Neil Green