

The Australian Veterinary Association Limited

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Tuesday, 19th March, 2013.

Committee Secretary
Parliamentary Standing Committee on Public Works
PO Box 6021
Parliament House
CANBERRA ACT 2600
AUSTRALIA
Email: awc@aph.gov.au

Submission No. 12

(Quarantine Facility)

Date: 19/03/13

Dear Committee,

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Its 6500 members come from all fields within the veterinary profession.

We welcome this opportunity to comment on the draft design plans of the proposed Post Entry Quarantine (PEQ) facility.

Feedback from our members have highlighted some concerns with the consultation process and the failure to take stakeholder advice, particularly regarding spacing of the different species facilities and the close proximity of live birds and hatching eggs. Issues with filtration to prevent airborne spread of infectious particles would appear to need more consideration.

A new, purpose built facility should provide ~~world's~~ best practice in protecting Australia from exotic diseases and it is important that the design of the station is consistent with biosecurity principles.

Yours sincerely,

Dr Ben Gardiner
President
Australian Veterinary Association



The Australian Veterinary Association

**Submission to the Parliamentary Standing Committee on Public
Works**

For a Post Entry Quarantine Facility

19th March 2013

Committee Secretary
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PO Box 6021
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Introduction

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Its 6500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, including cattle and sheep, and wildlife. Government veterinarians work with Australia's animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. The AVA has members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

We welcome the opportunity to comment on the post entry quarantine facility on behalf of AVA members.

Executive Summary

The AVA has had many members attend PEQ information presentations for stakeholders along with future users of the proposed facility and have made many recommendations during the formative phase, however there seems to be some common themes in the feedback from our members to the latest iteration of the plans for the PEQ facility.

- 1) Scientific and technical advice surrounding quarantine and biosecurity principles seems to be continually ignored in favour of budgetary and cost saving concerns, i.e. biosecurity and providing a world standard facility is hostage to budgetary decisions that will deliver a sub-standard facility that is in effect set up to fail.
- 2) Grave concerns remain regarding the placement of multiple species in close proximity with minimal separation distance between species sections and the adequate controlling of potential airborne pathogen spread between these species; e.g. equine influenza and west Nile virus.
- 3) Accommodation for persons responsible for valuable stallions and imported breeding stock, be that horses, poultry or incubating eggs continues to be a low or non-existent policy for the facility design. We feel this is an essential element to ensure the welfare of stock in case of facility failures or temperature fluctuation and to contain the biosecurity of the facility by reducing human movements to and from it.
- 4) The CSIRO runs a Biosecurity Level (BSL) 4 laboratory in Geelong and they should be contracted to run an independent risk assessment and biosecurity audit of the proposed facility to enable the acceptable level of risk to be applied to the facility design which could address the layout of the different species sections.
- 5) One of the successful design measures with the Sandown Horse quarantine facility was the operation of quarantine zones and the separation of the two via distance and separate security access portals. This system allows for outbreaks in one section to be contained and biosecurity lockdown to occur so to minimise the likelihood of spread to the rest of the facility. The design of the proposed facility makes this option problematic.

One station

The AVA has concerns about the concept of a single station to replace the existing four stations. An outbreak in the station could halt imports and place Australia at risk of disease, through release of shipments, even of other species, and of smuggling.

A single consolidated facility may enable some operational savings but from a biosecurity perspective it is questionable that a single, multiple species facility, separated into compounds, could provide the same level of biosecurity as separate facilities. Separation distance is one of the most important elements of biosecurity and in the absence of an appropriate separation distances, biosecurity becomes totally reliant on equipment, protocols and human behaviour.

Air borne transmission of equine influenza virus even from a small number of horses over significant distances between one to two kilometres was reported by several authors following the Equine Influenza outbreak in Australia in 2007 (NSW Public Health Bulletin, Nov 2009, Davis et al Transboundary and Emerging Diseases, 2009, Vol 56, Molony et al Australian Veterinary Journal, Vol 56. 63, July 2011). Transmission from horses to dogs has been reported in Australia (Kirkland et al, Emerg Infect Dis. 2010 April; 16(4): 699. 702). Thus, vicinity and airborne spread of influenza viruses over distances significantly further than the distance between the equine PEQ, the dog PEQ and the avian PEQ have been reported. There must be a design feature that addresses the issue of air filtration to prevent viral spread.

There appears to be a lack of comprehensive studies to assess the merits and risks of the proposed one multi-species, \$379 million facility, before short listing sites, investing in preliminary proposals and progression to 30% design.

The success of the CSIRO high security Australian Animal Health Laboratory (AAHL) in maintaining bio-containment for over 20 years can be used as a model for elements of the new station. AAHL could be asked to advise on the arrangements. An oversight committee like that of the AAHL Security Assessment Group should be established to provide independent expert monitoring of biosecurity.

Investigation of the outbreak of equine influenza indicated that expert leadership of the station is essential to bio-containment.

Ruminants

One concern is the lack of isolation from one group of ruminants to another. Disease outbreak in one section will potentially shut down the whole facility until epidemiological studies and testing can be performed. There is a lack of ability to isolate sections of the facility in its design. There appear to be no isolation facilities to hold an animal for preliminary tests or examinations.

There is no apparent sewerage treatment facility for containment of potentially dangerous effluent.

Equine

Equine veterinarians are concerned about the close proximity of the two horse compounds. It would be difficult / risky to release horses from one compound if there was an outbreak of disease such as equine influenza in the other. At the least the two compounds should be placed at opposite ends of the station. Airborne spread of equine influenza (EI) is well documented. There is insufficient separation of the horse facilities and no design features to prevent this airborne dissemination of virus.

The AVA believes on-station groom accommodation (also available to veterinarians) involving sleeping quarters to provide 24 / 7 availability as distinct from a lounge on station and attendants living off the station is essential. This is to provide maximum access for monitoring and treatment of horses when required. Many horses suffer from respiratory disease after the flight to Australia. Clinical services and accurate diagnoses are crucial. Bio-containment procedures for staff and grooms are crucial.

Companion animals

Having one station to serve all of Australia to replace all existing stations will make it very difficult for cat and dog owners who are resident interstate to visit their pets while they are in quarantine. Owner visits are important for the well-being of the animals and their owners. Earlier experience was that they are also important in reducing the likelihood of smuggling.

Cross contamination from horse barns does not appear to have been addressed. Canines have been shown to sero-convert and become antibody positive after exposure to equine influenza.

http://www.daff.qld.gov.au/4790_20741.htm

Avian

The AVA supports the continued importation of poultry hatching eggs and live birds into Australia using agreed importation conditions. The AVA also supports construction of new facilities that can meet the changing requirements for additional users, increased batch sizes and increased frequency of imports as expressed by users. These facilities must meet the highest standards for biosecurity and be available at reasonable cost to importers.

The project could only be successful if each of the avian facilities have total separation of air, water and drainage i.e. there can be no back flush.

The avian facilities have technically complex high security bio-containment systems and (like the whole site) must be under the direct control of persons with a high level of veterinary and biosecurity expertise. Administration of the Eastern Creek facility is believed by many to have contributed to the escape of equine influenza from that station.

On-site accommodation is particularly important for the avian facilities because of the reliance on functioning air handling and other bio-containment and bird support systems. Lack of on-site accommodation may affect hatching eggs and young birds in rearing through a prolonged response time to temperature fluctuations or power failure in the facility.

The design of the facility to accommodate future needs is of concern. There may be a need to increase the frequency of import batches, increase the size of import batches, import new species of birds and to handle new or emerging diseases.

Some details of the design are being questioned such as the proposal to have the avian facility on three levels and whether this is cost effective in construction and operation.

Commercial poultry veterinarians and others are concerned that facility is too small and strongly question the lack of separation between the hatching egg facilities and those handling live bird importations (pigeons and potentially in the future parrots). We understand that some current stakeholders claim to be unlikely to use the facility for this reason. One of the reasons for the facility is to minimise the inducement for illegal importation.

There have been at least two (2) detections of exotic poultry pathogens during the live bird importation program, being avian influenza and Newcastle disease. There have been no detections of pathogens of quarantine concern in any of the importations of hatching eggs. Hatching eggs and live birds are imported under differing importation conditions meaning their health status is not equivalent for all diseases. Despite the facility having HEPA filtration for all incoming and outgoing air, there is a concern about real and perceived poor biosecurity associated with adjacent fertile egg and live bird facilities. These historical isolations demonstrate the differing levels of risk.

The facility is designed to enable multiple hatching egg importations, potentially enabling different species to be quarantined at the same time, such as ducks and chickens. Structures and protocols could provide independent operation of the multiple species, but there is risk of human error. The risk is far greater than the current approach where the two facilities are on different sites.

We are also concerned that even when there is no spread of pathogens between avian consignments or between avian species, the potential for disruption of schedules and impact on poultry breeding programs could be significant if a pathogen of quarantine concern were to be detected in birds in the live bird importation program.

*The Australian Veterinary Association
March 2013*