ADMA
australian duck meat association incorporated

ABN 131 122 435

INC9889348

19 March 2013

Submission No. 18
(Quarantine Facility)
Date: 19/03/13

Dear Sir/Madame,

Re: Parliamentary Standing Committee on Public Works Regarding a Future Post Entry Quarantine Facility at Mickleham, Victoria

In providing a submission to the Parliamentary Standing Committee Regarding a Future Post Entry Quarantine Facility for Poultry and Avian's, the "Australian Duck Meat Association", has a role in supporting industry wide initiatives, and acts as an advocacy body for the sector. The ADMA is a not-for-profit organisation that has been recently formed to act on issues concerning the duck meat industry (e.g. health and welfare, statutory levies, R&D, environmental planning, food safety and perhaps generic marketing).

As a new stakeholder, the ADMA, also has interests in the issues involving the importation of hatching eggs, poultry meat and table eggs into Australia. The ADMA has had no previous opportunity to provide advice on issues associated with the proposed Post Entry Quarantine Facility (PEQ) at Mickleham Victoria and is thankful for the opportunity.

The Joint Submission to the Committee indicated that this project has been designed to protect a significant fraction of $42 billion agricultural industries, the unique native fauna, tourism and lifestyle and is guided by a key criterion – "ability to reduce biosecurity risks for Australia

The ADMA supports the continued importation of poultry hatching eggs and live birds into Australia using agreed importation conditions.

- The ADMA supports the new facilities that can meet the changing requirements for additional users, increased batch sizes and increased frequency of imports as expressed by users and which can meet user's reasonable expectations regarding biosecurity and usage fees.
- The ADMA acknowledges that a single consolidated facility for fertile eggs and live birds may have economic and operational advantages but, from a biosecurity risk perspective, the ADMA questions the merits of a single facility for multiple species and especially the amalgamation of the hatching egg and live bird importation programs in one location. It is felt that the biosecurity case has not been sufficiently investigated or reported and appears to have failed to take into account the user's concerns about real and perceived poor biosecurity associated with adjacent fertile egg and live bird facilities.

The facility is designed to provide effective microbiological separation between batches of birds of different origins which thus may be of differing health status. It is intended that that an infectious disease outbreak in one sector is unable to spread to other sectors or to the outside environment. The "High-Efficiency Particulate Air (HEPA)" filters are used on intake and exhaust air in the facility to provide an appropriate level of biological safety to prevent airborne viruses entering or leaving the units.

The design is based on the assumption that one or more batches may be incubating an exotic disease at any time and the isolation must be good enough to contain it at all stages, including in the time of a full outbreak with the slaughter of birds and disposal of infected materials including carcasses. This degree of isolation can be achieved by providing physical separation by distance or by high levels of filtration. Both of these methods also depend upon the operation of strict protocols governing the movement of people, equipment, feedstuffs, wastes etc. This is, of course, the weak point in any attempt at isolation.

In estimating levels of risk of spread between units a case can be made that there would be more danger of an outbreak of disease in the live bird facility than of an outbreak in the fertile egg facility. Birds in the live bird facility are accepted into Australia on different protocols from those applying to fertile eggs. The level of risk of spread between units in the fertile egg sector may be considered to be less serious as all the batches come from source flocks that are of similar health status and thus the risks can be seen to be less. In contrast it is seen by some (*See below*) that the health status of live birds is set at a different level, and thus they impose a greater threat to the commercial poultry batches. This concern has led

to a proposal that the live bird unit be located physically separate at a distance from the fertile egg unit. The perception of a lesser level of biosecurity in protocols and/or operations associated with live birds needs to be addressed by a risk analysis.

Both fertile egg sources (isolated breeder farms) and live bird sources (isolated holding facilities) are required to be tested for freedom from the same extensive list of diseases, however history has shown that no breakdowns have occurred with fertile egg imports but two have occurred with live birds.

There have been at least 2 detections of exotic poultry pathogens during the life time of the live bird importation. The first was the detection of Avian Influenza virus and Newcastle disease virus infection (antibodies) among imported Canadian pigeons that arrived at the PEQ facility at Spotswood on the 5th of September 2005. These pigeons were subsequently euthanased. The second case was again with live pigeons that were detected with a pathogenic Newcastle disease virus in October 2010. These birds were imported from the USA.

During the lifetime of the poultry hatching egg program there has been no detection of a pathogen of quarantine concern in any of the imported hatching eggs or hatchlings. The two incidents in pigeons clearly demonstrate that a higher level of risk is associated with the live bird importation program despite the rigorous pre-quarantine testing in the countries of origin. These incidents do not, however, suggest any failure in the current isolation facility's ability to contain the pathogens involved

Furthermore, even with 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 was detected in birds in the live bird importation program.

Even if a properly functioning HEPA filtration in the avian facility enables a complete elimination of the risk of airborne entry and spread of various pathogens, the plan does not specify what backup exist in case of a breakdown of the system?

What interchange of staff may occur between facilities on this site and what mitigations are proposed to prevent transfer of infections from mixing of staff and materials in the common areas (corridors, stores, toilets break rooms etc)? What additional tests may be required to demonstrate no spread, what delays may be experienced by importers sharing the facility until the epidemiological picture became clearer. In addition, infections although not of quarantine concern, or of minor concern for one species, are not necessarily minor for other species, and could affect production and profitability. The impact could also be significant if such infections entered the hatching egg program or neighbouring other consignments.

In summary the cost/benefit analysis of the co-location of the “Live bird facility” with the “Hatching egg facility” is of major concern to the ADMA, and we hope that alternative arrangements could be established that provide a lower risk and more likely successful long term and sustainable PEQ capacity.

Yours faithfully

Secretary/CEO

Dr Greg Parkinson

Greg Parkinson

Secretary/CEO ADMA