THE AUSTRALIAN VETERINARY ASSOCIATION LIMITED

ACN 008 522 852

18 June 2002

The Chairman
Parliamentary Joint Committee of Public Accounts and Audit
Parliament House
CANBERRA ACT 2611
*Fax (02) 6277 2220*

Dear Chairman,

**Review of Australia's Quarantine Function**

The Australian Veterinary Association is the National body representing the veterinary profession in Australia. AVA makes its wide access to veterinary expertise available in the national interest and is routinely consulted by Commonwealth, State and Territory governments.

AVA welcomes this opportunity to provide a submission to the review of issues raised in Audit Report 47, 2000-01 *Managing for Quarantine Effectiveness-Department of Agriculture, Fisheries and Forestry-Australia*.

The Executive of the AVA would be available to provide in person evidence to the Review if required.

Yours faithfully

Dr Jo Toia
President

134-136 Hampden Road, Artarmon NSW 2064
PO Box 371 Artarmon NSW 1570
Telephone: (02) 9411 2733
Facsimile: (02) 9411 5089
Email: avahq@ava.com.au
Web Address: www.ava.com.au

**PARLIAMENTARY JOINT COMMITTEE OF PUBLIC ACCOUNTS AND AUDIT**
**PARLIAMENTARY JOINT COMMITTEE**
**REVIEW OF AUSTRALIA'S QUARANTINE FUNCTION**

# A SUBMISSION FROM THE AUSTRALIAN VETERINARY ASSOCIATION

## Executive Summary


Veterinarians, private and governmental have a major stake in quarantine.

The Australian Veterinary Association (AVA) makes its wide range of expertise available to quarantine for policy and operations in the national interest at national and international level.

The risk analysis process developed by Biosecurity Australia is developing science based policy which is subject to peer review. The process is continually being improved. AVA suggests caution with generic protocols.

Information gathering, risk analysis and benchmarking can be applied to AQIS operations to ensure leakage of quarantineable goods is reduced to a known minimum and that resources are directed to areas of greatest risk. Australia should benchmark with at least one like-minded country.

Profiling and risk analysis for operations should be directed to the level of disease risk rather than the level of interception / leakage alone.

The objective of quarantine should be to reduce the rate of incursions.

Pre-border activities to address disease risks off-shore should be maintained an augmented.

Post border activities need attention. Additional resources have been applied to the quarantine barrier with considerable effect but additional attention is needed to post border activities to ensure early recognition and response to emergency animal diseases. Post border activities also support export certification. Private practitioners have demonstrated with FMD in UK that they can make a major contribution to this.

The upcoming rural veterinarian study will be critical in ensuring post border resources are in order.

The Broker Accreditation Scheme and Border Risk Management Project are worthy of continuance and monitoring.

AVA supports continuing efforts to define Australia's Appropriate Level of Protection. This is in the national interest.

Engagement of States and Territories is important for access to essential farm and regional information and support.

## Introduction

The Australian Veterinary Association is the national body representing the veterinary profession in Australia.

The profession is responsible for the clinical care of all species from small or companion animals, through farm species to wild, feral and laboratory animals. The profession covers many subjects relevant to the Review.

While best recognised for clinical work and animal disease control veterinarians play a major role in public health and food safety. This is through the control of diseases spread from animals to humans, animal husbandry and administration of drugs and chemicals, all of which directly affect food safety. These matters also are important in world trade.

The profession is extremely diverse, incorporating a wide variety of disciplines, not necessarily reflected in public perceptions. The AVA is structured to service this diversity and to be transparent to its constituent bodies and in its external relations.

AVA has eight Divisions, one in each of the States and Territories. The larger Divisions are divided into Branches, which are geographically based. AVA also has 22 Special Interest Groups (SIGs), each of which is a semi autonomous society with its own elected office bearers and finances, all are governed by the AVA Board. A Policy Council provides a forum for the Divisions and Special Interest Groups and advises on policies. Policies are published for comment in the *Australian Veterinary Journal.* The Journal is a world class scientific journal as well as reflecting the affairs of the AVA. Policies are ratified by the Board and published in a *Members' Directory and Policy Compendium.*

The Special Interest Groups are:

Australian Association of Cattle Veterinarians
Australian Association of Holistic Veterinarians
Australian Association of Pig Veterinarians
Australian Association of Veterinary Conservation Biologists
Australian Association of Veterinary Practice Managers
Australian Avian Veterinary Medical Association
Australian Camelid Veterinary Association
Australian Embryo Transfer Society
Australian Equine Veterinary Association
Australian Greyhound Veterinary Association
Association of Registered Veterinary Specialists
Australian Small Animal Veterinary Association
Australian Sheep Veterinary Society
Australian Veterinary Acupuncture Association
Australian Veterinarians in Ethics Research and Teaching
Australian Veterinary Dental Society
Australian Veterinary History Society

Australian Veterinarians in Industry
Australian Veterinary Informatics Association
Australian Veterinary Poultry Association
Australian Veterinarians in Public Health
Employed Veterinarians Association

The AVA maintains close liaison with the Australian College of Veterinary Scientists. The College provides postgraduate qualifications through its 15 Chapters. These qualifications provide the basis for registration as specialists in Australia and New Zealand.

The Chapters of the College are:

Animal Behaviour Chapter
Animal Welfare Chapter
Chapter of Anaesthesia, Emergency & Critical Care
Chapter of Pathobiology
Chapter of Epidemiology
Chapter of Radiology
Small Animal Medicine Chapter
Chapter of Veterinary Pharmacology
Chapter on Avian Health
Chapter of Surgery
Chapter on Equine Diseases
The Cattle Chapter
Chapter of Ophthalmology
Feline Chapter
Chapter of Veterinary Dentistry

Regulation of the profession

The veterinary profession has been strictly regulated by legislation for a century or so in virtually all developed countries. Its conventions and ethics have evolved over centuries. The profession imposes on itself strict disciplines in line with its responsibilities to its clients, patients and the community. Responsibility for the use of controlled drugs and prescription animal remedies demands such discipline. The ethics of the profession are important in the context of provision of services to government through the Accreditation Program for Australian Veterinarians (APAV).

Participation in government programs may involve veterinarian/ patient/owner relationship, especially in relation to emergency animal diseases. This relationship and professional ethics are reflected in pro bono services to the community in the treatment of wildlife and stray animals and in community advice. A recent survey indicates that the profession provides such services to the value of $35m annually without charge to the community.

Registration and regulation of the profession provide an excellent assurance of quality and integrity of Australia's veterinary services to foreign countries. This is important

in the context of risk analyses undertaken for access to foreign markets and of domestic consumers of animal products.

Australia's veterinary service, comprising all sectors of the profession, government and private, is under international scrutiny in the context of world trade. Australia's veterinary service and excellent animal health status, which has been achieved through quarantine, disease diagnosis and reporting together with export testing and certification systems, underpin our exports of animals and their products. They have to cope with emerging diseases, complex international laws on drugs and remedies and World Trade Organisation disciplines.

National and international affairs
AVA has influence at the international level through membership of the World Veterinary Association and the International Veterinary Officers Council. The latter involves variously the veterinary associations of UK, USA, Canada and New Zealand and the World Veterinary Association. The *Australian Veterinary Journal* is internationally recognised as a leading scientific journal. Articles published therein attract credible scientific attention.

AVA is a shareholder (with governments and industry) of Animal Health Australia and is a participant in national activities in animal health and welfare. AVA is consulted on planning of responses to outbreaks of animal disease through AUSVETPLAN and in 2001 AVA organised a program under which 37 private veterinary practitioners went to UK to assist in eradication of FMD.

The national veterinary service and health status form part of risk analysis undertaken by importing countries when Australia seeks market access. The International Animal Health Code of the Office International des Epizooties is recognised by the World Trade Organisation as the harmonised world standard for quarantine as it relates to international trade. The Code requires surveillance to demonstrate freedom or zonal distribution of some diseases. Laboratory support is important and necessary in some cases such as in the National Transmissible Spongiform Encephalopathy Surveillance Program. However much of the passive disease surveillance is achieved through the activities of rural veterinary practitioners.

The need for quantitative surveillance data is increasing. Such matters have assumed greater importance since the massive outbreak of foot and mouth disease in the United Kingdom in 2001.

**AVA Comment on Specific Matters.**

Quarantine policy and operations.
AVA is a registered stakeholder in animal quarantine matters. AVA and its SIGs have input into quarantine policy making through comments on the Animal Biosecurity Policy Memoranda circulated by Biosecurity Australia for consultation. Contribution is also made to AQIS operational decision making on specific request and when sought on particular Quarantine Operations Notices. AQIS consultation procedures are not as formal as those of Biosecurity Australia.

AVA Quarantine Advisory Committee co-ordinates AVA responses which are usually based on information provided by the appropriate SIG.

AUSVETPLAN and the role of rural veterinarians
The up coming review of the reasons for the shortage of veterinarians in rural areas is in part based on their links with the quarantine barrier and post barrier activities. The latter would include disease surveillance, exotic and endemic disease control programs, early recognition of disease and early response to suspected outbreaks

AVA notes that the 2001 outbreak of FMD in the United Kingdom resulted in allocation of increased resources at the quarantine barrier but few resources for the post barrier handling of outbreaks of emergency animal diseases. The UK outbreak demonstrated the important role of private veterinary practitioners in handling such outbreaks. Members of the three AVA teams who participated in the UK outbreak have confirmed this. The participation of private practitioners including those based in the UK and recruited as Temporary Veterinary Inspectors was a major factor in the control of that outbreak.

It is clear that even without the recent reductions in State Veterinary Services it would not be possible for Government veterinarians and other staff to sustain control operations in a large outbreak in Australia. Quite apart from the staffing issues there is the question of fatigue and the need for replacement of staff in the field and in the Local Disease Control Centre and the State Disease Control Headquarters of operations in headquarters when outbreaks extent over time.

AVA is pleased to note the incorporation of private practitioners in planning for emergency diseases through AUSVETPLAN. The idea of a trained veterinary reserve (rather like the Army Reserve) has been raised by participants in a workshop held to capture the experiences of the practitioners who went to UK. The workshop was organised by AFFA and Animal Health Australia by arrangement with AVA. AVA believes a veterinary reserve could form part of exotic animal disease planning.

Import Risk Analysis
The conclusions of the ANAO audit (paragraph 13) make reference to expansion and restructuring of the import risk analysis (IRA) process. The process of consultation established by Biosecurity Australia through the Animal Biosecurity Policy Memoranda is sound. While improvements are being made regularly AVA is generally satisfied with its progress. The recent changes are addressing the Routine and Non-routine approaches to risk analysis and AVA recognises their value.

At paragraph 15 the ANAO report also indicates that the Biosecurity risk analysis process tends to produce controversy and uncertainty. AVA suggests publication of proposals in a Journal or a website in complete form as is done by North American agencies. AVA notes that some documents are available on the website. In USA this occurs in the daily US Federal Register. This may draw comment from the community generally as distinct from circulated stakeholders alone.

The scientific review documents, which are usually developed by technical working groups to support quarantine protocols, are of high standard and can withstand

international peer review. AVA is pleased to nominate or support experts to such groups.

AVA notes that the Acceptable Level of Protection (paragraph 26) is difficult to define but accepts that definition is important in the context of maintaining Australia's sovereignty over disease standards while participating in world trade. ALOP has to be linked to domestic standards and the post border continuum.

Quarantine resources

AVA comments are based on the increased budgetary allocations to quarantine which have increased staff numbers and physical resources, including x-ray units and detector dog teams, and which allow targeting of 100 percent of airport passengers except at certain peak times. The additional resources also facilitate closer examination of mail and parcels. New x-ray equipment acquired by Customs provides for examination of the contents of shipping containers.

These new measures greatly improve the levels of detection of dangerous items. However a critical matter is the directing of resources to best effect.

Operational Risk analysis

The risk analysis process might well be more readily applied to AQIS quarantine operations. AVA would agree with the ANAO report that risk analysis could be used to target resources and to determine quarantine risks so that resources could be directed to areas of greatest need. Risk analysis could be applied to various modes of entry of people and goods into Australia. This approach is used in Northern Australia Quarantine Strategy.

AVA believes that risk analysis techniques can be based on intelligence on the disease status of overseas countries, the types of products being carried by passengers or shipped from various countries and the disease risks associated with such products. The objective is to address the actual animal and plant risks rather than the volume of goods intercepted or missed.

Paragraph 18 of the report indicates AQIS performance target is a zero increase in the rate of incursions. AVA suggest that the objective should be a reduction in the rate of incursions. We recognise that some incursions are of plant pathogens or insects and that some enter by natural means.

Risk analysis can also be linked with profiling which is used as a tool for assessment of travellers on arrival. Customs and Quarantine Officers at the barrier and in covert teams need this support to assist searches and detector dogs. Profiling can also assist in directing resources to areas of greatest need. This applies to the particular needs / risks of groups entering Australia for special events like sporting or political events.

Public relations

AVA recognises the sensitivity of public perception. Quarantine measures instituted after the FMD in UK and the terrorist attacks of 11 September 2001 increased public confidence. This is despite the fact that some measures like the ban on horses from UK were not science based. Our advice is that the detector dogs have great public relations value.

Pre-border operations
The ANAO report (paragraph 21) expresses concern about the lack of targets and plans set by AFFA to make pre-border clearance more effective. Reference is made in the ANAO report to possible unreliability of inspection and certification by overseas countries. This can be managed by procedures based on AQIS approval of overseas private or public organisations / premises supported by monitoring on arrival. Failures should then lead to loss of pre-export treatment and certification privileges for a given number of shipments or till re-examination and approval by AQIS.

Treatment overseas can provide additional security in that untreated material does not enter Australian soil. The recent crash of a truck carrying imported uncooked Canadian pig meat is an example of the risks of requiring treatment here. The critical issue is establishing an appropriate control system.

AVA believe that postings for veterinary counsellors stationed overseas assist pre-border clearance (inter alia) and should be maintained. Threats from bio-terrorism augment their value in intelligence gathering, representations and association with pre embarkation testing, inspection and certification of products, animals and genetic material, is a critical component of our disease security.

Overseas operations such as military exercises where personnel, equipment and vehicles are inspected off shore are critical. Quarantine activities in East Timor eliminated the need to handle risky materials that are difficult to dispose of, such as soil, in Australia. NAQS follows similar strategy and provides and excellent underpinning for activities in the north.

The program of supervision of pre-embarkation quarantine for livestock, genetic material and certain products and for veterinarians accompanying livestock shipments improves security. Pre-departure quarantine procedures constitute an important part of all high risk enterprises.

Border quarantine operations.
Should the interception rates of high risk items reach those projected by AQIS, 87% at airports and 96% at other points of entry, Australia would have an enviable level of biosecurity and arguably the best in the world.

AVA would agree with the ANAO summary the AQIS has improved management of risk and supports the application of risk concepts, data management and analysis of risk consequences. This would apply to Barrier Services at airports, seaports, mail exchanges, private mail systems, cargo systems at sea and airports (including containerised and bulk cargo) and airport waste.

Red Channel leakage till now seems high and would seem to be an area requiring attention. Low interception rates for mail is a concern given the size of “letter class” allows quite large items to come to Australia. It is accepted that the enhanced measures may have improved the low 11% interception figure. This area needs monitoring and ongoing risk analysis by country.

The Broker Accreditation Scheme appears to be a good example of taking assistance from industry as a means of reducing costs and risks and typifies the "partnership" approach proposed by the Nairn Review.

The Border Risk Management project proposed by AFFA would appear to address urgent concerns.

Benchmarking
Collection of data as proposed should allow assessment of risks of leakages. It may help determine the improvement in interception of quarantineable goods carried by passengers and mail under the increased resource levels.

Benchmarking should address actual disease risks rather than raw interception data.

AVA would suggest that Australia should benchmark with at least one like-minded country. New Zealand has a high level of quarantine security and is an island. Adjustments could be made for the volume of trade.

We believe that all benchmarks which involves seizure rates or leakage rates should combine an assessment of the type of product and the actual quarantine risk of that product based its nature and the country from which it came.

Post Border.
AVA recognises that ships waste and other incidental materials have been responsible for introduction of exotic animal diseases into many countries. AVA and notes the efforts being made in improving wharf surveillance and supports these efforts. The barrier at wharves is inevitably less controllable than airports

There should be a seamless link between the quarantine operations and the post border activities of the States and under AUSVETPLAN. The wind down in State veterinary services and privatisation of laboratories has changed Australia's passive surveillance and our capacity to detect the disease early, to know the patterns of endemic diseases and to provide export certification. We recognise that it may not be possible to return to the situation where laboratory accessions are analysed without cost to the producer. Nevertheless, AVA believes that the value of pathology goes beyond the value to the affected farmer. Some costs need to be socialised to ensure essential data are collected.

By example passive surveillance previously provided a good understanding of the distribution of infectious bovine rhino-tracheitis. This was used in evaluation of bulls going into artificial stock breeding centres and for assembling shipments of export animals and for other disease control proposes. This information is no longer available.

Smuggling
There are references to smuggling in the ANAO report. Measures to prevent introduction of prohibited goods through international airports have been upgraded immeasurably with increased allocations of resources to quarantine. It would appear more likely that introduction would be through other means of entry such as seaports, private aircraft or itinerant yachts, which are more difficult to police.

Generic protocols

References are made in the ANAO report to development of generic protocols. AVA recognises that this may simplify justification in the WTO: context. However AVA feels it is not necessarily prudent to have a single import protocol for a given commodity from all countries. It is not always possible to design a single measures with variations or discretions to address the disease status, reporting systems, control and quarantine measures, standards of veterinary services and inspection and certification methods for all countries. There can also be many forms of preparation of similar products among different countries so the potential for carriage of animal disease agents in quite wholesome products may differ. Seeking to include too many variables inevitably involves complications, compromises and ambiguities.

Engagement of the States and Territories

AVA believes that the Commonwealth needs to engage the States and Territories in quarantine and post border activities. States and territories have the expertise and scientific links with the local scientific and farming communities. They have records of diseases and activities within the farm gate far beyond the general information provided by the National Animal health Information System. They are involved in the first recognition of diseases and provide the basic information for export certification. From Federation to 1994 quarantine operations were carried out under an agency arrangement using State staff funded by the Commonwealth to the proportion of their time spent on quarantine work. This made trained local staff available wherever required, at cost. State Chief Veterinary Officers were gazetted as Chief Quarantine Officers (Animals) and provided policy advice. The agency arrangement also provided direct access to State laboratories, museums and other support services.

Some means of engagement of the States is necessary to access this expertise and to ensure that Commonwealth quarantine activities have State support and a seamless link with State post border responsibilities. Formation of the National Management Group goes some way to achieving this but at high level. Isolated Commonwealth Quarantine offices do not have immediate links into this infrastructure.

**Individual recommendations**

AVA generally agrees with all of the 8 recommendations made by ANAO and various comments from AFFA in response.

Australian Veterinary Association
18 June 2002