

**Submission to the Parliamentary Standing Committee on Public Works regarding a Future  
Post Entry Quarantine facility at Mickleham, Victoria**

**By**

**Avian Importers Australia**

**(Stakeholders of the Torrens Island hatching egg import facility)**

The Torrens Island stakeholders are fully integrated producers of chicken meat, table eggs, duck meat, duck eggs and Turkey meat products. We represent Hi Chick Breeding Company, Hy-Line Australia, Luv-A-Duck, Pepes Ducks and Rainbow Valley Turkeys. Aviagen operate their own private quarantine facilities. All stakeholders are repeat users of the Torrens Island Hatching Egg Facility, we have an ongoing need for importation facilities, and our future import requirements will maintain a fully-booked programme through the foreseeable future. The Torrens Island stakeholders have a long standing positive working relationship with each other which led to the development of the Avian Importers Australia group, and also with AQIS at the operational level to work through the rigours of the importation process, fully maximise the allotments of imports, and maintain smooth management of the facility.

## **SUMMARY**

The stakeholders support the Commonwealth's objectives to build a new avian quarantine facility but express our collective concerns that the working group responsible for the design of the new facility has not listened to stakeholder concerns raised on a number of serious matters on which decisions are being made. We have raised objection to a single foot print building concept since our first briefing at the five percent concept stage.

On biosecurity grounds, we are opposed to the very idea of a facility combining both fertile eggs with live bird facilities because of the inherent dangers of staff commingling in shared amenities, service areas, ingress egress etc. All stakeholders import from elite international disease-free breeding facilities which are maintained under the highest level of biosecurity in the world, which form a completely different risk profile compared to the cage/ live bird imports.

On daily operational grounds, the care of our hatching eggs during incubation and baby chicks in brooding requires response times within minutes. The avian hatching egg import facility **MUST** include provision for on-site accommodation for our company trained hatchery and husbandry staff that must be available for emergencies and baby chick welfare.

We confirm our intent to work with the Commonwealth to achieve a 'minimal risk' outcome, but emphasize our history of working with a culture of 'zero risk' ambition in the importation areas of our business as the consequences of failure at this level could cripple the business and even the industry. This concept applies to our thinking and cultures beyond the list of disease agents tested for in the PEQ facility, but extends to other infectious disease agents and general risk management to assure supply of healthy disease-free stock in the correct numbers into our local breeding programmes to maintain the flow of genetics and product improvements to the local industry. Our members have spent millions to invest in remote/ isolated facilities for our genetic stock, and there has been unanimous feed-back rejecting the prospect of breaking the current scenario by combining imports with other stakeholders let alone combining with a higher disease risk profile (live bird sector). Our members take biosecurity so seriously that we conduct additional monitoring to that prescribed by Biosecurity Australia to ensure that agents beyond those included on the testing programme are excluded from imported stock. Due to the high cost and difficulties of access to Torrens a risk to our local elite breeding programmes, and thus the local poultry industries, is an unacceptable outcome for all stakeholders in the poultry industry.

The stakeholders unanimously support all three of the PEQ project objectives namely:

1. Support continued access to imported genetic material.
2. Deliver the best value to the Australian Government for its investment over the whole the life of the assets and buildings.

3. Provide a facility that offers effective biosecurity and accommodates PEQ need for the next 50 years.

## **SUPPORT FOR AVIAN QUARANTINE OBJECTIVES**

The stakeholders are all fully integrated producers of chicken meat, table eggs, duck meat, duck eggs and turkey meat products. Access to imported genetics is vital to our organisation's ability to remain competitive and productive in the Australian and world markets. Indeed with the restriction of importation of poultry meat and egg products, the entire Australian industry is reliant on the regular imports by our stakeholder group members including 100% of the commercial egg and duck industries, 50% of the turkey industry, and 30% of the broiler meat industry. All stakeholders are repeat users of the Torrens Island facility and have maintained a 100% utilisation of the facility over the past 10 years since given the programme management by the Commonwealth in 2002. We fully expect to continue using the new PEQ facility and have an interest in keeping the facility booked in the years to come.

## **BASIC PROBLEM**

The stakeholders unanimously and completely reject to the design of an amalgamated/ co-joined facility for live bird imports historically practiced through Spotswood, VIC, with hatching egg imports/ live bird release through Torrens Island, SA.

Unless our frequently raised objections to the serious flaws in the currently proposed 'single foot print' concept are taken into account, the building will have minimal appeal to the commercial poultry industry.

The proposed facility is of limited value to the stakeholders as the various organizations perceive the risks of cross-contamination between units are seen as just too high and presents a commercially unsound risk profile. Not only are we worried about diseases of concern to AQIS but also different non-import strains of pathogens which could enter our flocks and cause ongoing disease and production issues given the imported birds are the only genetics that enter our isolated elite breeding operations, and the Australian poultry industry is completely dependent upon the stakeholders monitoring the health of these flocks.

## **LACK OF PREVIOUS CONSULTATION**

The stakeholders are concerned that the currently proposed multi-import/ amalgamated avian facility at the new Mickleham quarantine site has not taken fully into account any of the concerns raised by all the avian stakeholders who currently use the existing Torrens island facility. The issues and concerns have been voiced very strongly, submitted in writing to the Commonwealth project team, and include concerns about biosecurity risks, capacity, and the Standard Operating Procedures (SOP) of the day to day operations of the proposed facility. Stakeholders agree that Australia's \$442 billion agricultural industries are still at some risk with this new \$379 million quarantine facility.

Stakeholders have not had any access to risk assessment studies which must have been developed in conjunction with such a significant shift away from isolated to amalgamated import facilities to arrive at the current floor plan proposal. The avian stakeholders have not been able to have any practical input to the facility's design since the concept was first disclosed at the five percent level.

We the stakeholders are very concerned and disappointed that our united voice and other avian quarantine facility users have not been incorporated into the facility concepts as the design has progressed through to the 30% stage. The stakeholders have been represented at all briefing sessions held by the Commonwealth, however there has been no evidence that our feedback has been incorporated into subsequent development stages. None of the people who have used the current Torrens

Island quarantine facility regularly have had any input into the planning or the practical running of the proposed building. Indeed the industry liaison sessions have been a one-way flow of information from the project team to industry, and not a stakeholder consultation process.

Many housekeeping issues continue to remain unresolved and stakeholders must be convinced the building could be workable. Now is the time to engage the users of the Torrens Island facility to call upon their experience to improve process flow efficiencies and technology in a new facility given the intended period of use. Stakeholders who have physically worked at Torrens have first hand experience in the current building's short comings, and the floorplan design needs this feedback for such things as best use of space, placement of ventilation filters, incubators, power points, drainage, handling bird feed and bird bedding etc. as well as ease of removal of birds and manure at the end of the importation. At no briefing meeting has a fully detailed plan been provided (only a scaled 1-400) showing no measurements on it or details.

## **BIOSECURITY**

### **Opposition to combined facility**

Stakeholders in the avian industries have been opposed to the concept of a combined hatching egg and live bird facility since it was first proposed approximately four years ago. A consolidated facility for fertile eggs and live birds may appear to have operational and economic advantages, but we question whether the same level of biosecurity can be maintained as currently exists with the two separate facilities. The stakeholders are very concerned at the lack of transparency regarding the biosecurity grounds on which decisions are being made and the intended building's projected life span of 50 years. Stakeholders also do not support co-importation of commercial stock through the multi-room design that has been developed. This represents an unacceptable risk to listed agents, unlisted agents and line security. As a compromise, the industry proposed to the working group that a separate incubation facility be constructed with a pass-through/ passage into the live bird holding area, which would address current problems by allowing incubation facility cleaning straight after hatch, and significantly reduce the down-time between campaigns if the 2 sections could be cleaned independently. This alone could increase the capacity by 33% (1 import slot per annum). It would also provide a buffer in the event of a temporary delay to campaign release due to delay in test results etc.

Line integrity is also very important to our members. We make commitments on the breeding of our lines to the industry and our international suppliers and importers carry all of this risk. Line integrity has been historically maintained for import campaigns through Torrens Island due to a) island access security, b) facility access security, and c) single import campaigns. The stakeholders need assurances that these will not be compromised with the future facility design.

### **Shared amenities**

The avian egg importers have an unblemished record with no failed import campaigns on health breach grounds, a record we are proud of and wish to keep. Concepts to co-import or share any space with pigeon imports is of particular concern as pigeons have a poor track record of disease outbreaks within the quarantine facilities at Spotswood, for example, in 2005, Newcastle disease and Avian influenza were detected from pigeons in the Spotswood facility, and in 2010, Newcastle disease was again detected in pigeons.

In addition to being very concerned about higher risk exposure to exotic disease agents with co-importation practices, incursion may inadvertently delay release of 'clean' stock and potentially increase laboratory testing costs, but more importantly, companies may be forced to choose whether to even return an import campaign into their breeding facilities if an adventitious agent was detected in an adjacent facility within the complex. We are also concerned that there is a real risk of inadvertently

picking up a new bacterial or viral strain of a common poultry pathogen not of quarantine concern and introducing this back into our commercial operation.

Commingling of staff members in the common amenities and corridors is a further biosecurity risk. While the commercial poultry industry staff members follow strict policies of remaining separate from other poultry and pet birds, we could never be confident that hobbyists, unfamiliar with the restrictions involved, would follow the same rigorous procedures regarding biosecurity that commercial company employees do.

## **ON-SITE ACCOMMODATION**

The stakeholders are also collectively very concerned that no on-site accommodation has been considered on the new quarantine campus. Once again this demonstrates a lack of understanding of how the poultry industry operates, as we all provide and insist on our facility managers residing in close proximity when on alarm duty. Our stakeholders need to be able to respond immediately to an alarm and address the situation within minutes. As part of a zero risk approach, loss of a campaign due to incubator or facility failure is unacceptable and would completely disrupt the breeding programme and have a consequential impact on the industry due to restricted access for re-importation.

Our current experience from Torrens Island suggests that the inability to respond rapidly to alarms is a significant and meaningful issue.

In concluding, we believe that following the PWC hearing last month DAFF was asked to engage an expert panel to advise and report back to the standing committee to address issues raised by a wider set of industry stakeholders for the PWC hearing. However, none of the current stake holders were selected to this committee and we hold concern that the agenda will not fully address the concerns raised at the PWC hearing last month and included in this letter above.

Submitted by  
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on behalf of **Avian Importers Australia**  
(Torrens Island Stakeholder Group)

Hi Chick Breeding Company  
Hy-Line Australia  
Luv-A-Duck  
Pepes Ducks  
Rainbow Valley Turkeys

30<sup>th</sup> April, 2013