

19.3.13

**Submission to the Parliamentary Standing Committee on Public Works  
regarding the proposed post-entry quarantine (PEQ) facility at Mickleham,  
Victoria**

- 1.0 The availability of biosecure PEQ facilities for the importation of poultry hatching eggs is essential for the continued viability of the Australian poultry industry. These facilities are critical to ensure the future sustainability and efficiency of commercial poultry production in Australia via importation of advanced genetic material, and to maintain the high health status of Australian commercial poultry. They are instrumental in ensuring the future food needs of Australians are met, to increase exports of food and genetic stock, and to prevent illegal importation of avian species and the disease risk this poses to native and captive avian species.
- 2.0 A single, consolidated avian importation facility, potentially combining multiple importations of poultry hatching eggs and live pigeons in close proximity increases the risk of an imported infectious disease in one group of birds being spread to another, compared to the risk if the facility were separated, and managed on the recommended industry biosecurity practice of 'all in, all out' principles. It is acknowledged the risk of importation of an exotic disease into Australia is not increased by the proximity of the different imports within a single facility; however the risk of transmission of disease from one importation to another is much greater than if the locations were physically separated in distance or time. The proposed design relies on management protocols to prevent movement of people, equipment and wastes between the live bird and poultry areas rather than distance (as would be achieved by having separate facilities) or time (by ensuring only hatching eggs or live birds were present). The use of PC3 level biosecurity (including HEPA filtration) is only as good as its backup in case of failure, details of which cannot be established from the plans provided. Any risk assessment detailing the reasons behind locating the facilities for importation of live birds and hatching eggs together in a single footprint has not been made public.
- 3.0 The import protocols for pre and post export testing of live birds and hatching eggs are different, due to the different risks associated with their importation. A risk assessment addressing the risk of importing and hatching imported poultry hatching eggs in a PEQ facility in very close proximity to live birds of different health status within an adjoining PEQ has not been released to the public. This document must take into account not only diseases of quarantine concern, but also endemic diseases that the imported hatching eggs of one species may be free from that another species, or imported live birds, may carry including Pasteurella,

Salmonella, Chlamydia, and crucially, bacteria carrying antibiotic resistance genes. Live birds in countries other than Australia are treated with antibiotics not available to the Australian poultry industry. Our poultry products are unique in the world for being free of bacteria resistant to antibiotics of critical significance to human medicine. There is no evidence there has been consideration given to the possibility of bacteria moving within the facility as a result of human movement or equipment failure

- 4.0 Insufficient design and cost estimates have been provided with the Department of Agriculture, Fisheries and Forestry and Department of Finance and Deregulation (DAFF/DFD) joint submission to allow accurate assessment. A major omission identified in the plans provided is the lack of proposed accommodation on site. This is a real concern on welfare grounds. Incubators containing hatching eggs and live bird areas are alarmed in case of electricity phase failure and to alert staff when the environment inside the facility is operating outside optimum ranges for temperature and ventilation. Alarms must be physically responded to, in person and within minutes to ensure the viability of embryos and the welfare of the birds. It is not feasible for poultry staff managing the facility to be located more than a few minutes away or the welfare and viability of the stock in an emergency situation is likely to be compromised. All currently approved avian PEQ facilities have at least one accommodation site within five minutes. This ensures a properly qualified person is available to attend alarms and resolve any issues in a rapid and efficient manner, thereby ensuring the welfare of the stock. Sufficient human accommodation needs to be provided for each species on site as the expertise required for caring for one species is unlikely to be transferrable to other species on site.
- 5.0 I question whether the design of the avian facility on three levels is the most cost efficient manner to build this facility, particularly if expansion may be required to meet future needs. There is inadequate design information provided for accurate assessment.
- 6.0 I strongly support the continued subsidies for importers of avian genetic material to reduce the likelihood of illegal importation, and to reduce the risk of importation of exotic disease and the potential affects to the commercial poultry industry.
- 7.0 I am disappointed at the continued failure of DAFF to respond to repeated and ongoing concerns raised by various industries and stakeholders at consultation meetings. Concerns regarding the location and multi-species design of the post entry quarantine facility have been many and vocal. Consultation sessions appear to have been designed to inform industry participants of decisions that have been made, rather than to take advantage of the industry and stakeholder knowledge present and to incorporate suggestions, comments and information into plans and designs, and to ensure the buildings are designed and built to appropriate standards with the requirements of importers in mind. It is my belief the single, consolidated PEQ facility design proposed is not a design any industry stakeholder is in any way satisfied with.
- 8.0 In summary, I support the continued importation of poultry hatching eggs into Australia using the currently agreed importation conditions and via approved post entry quarantine facilities. However, I have serious concerns regarding the single nature of the avian facility and the possible increased risk of disease transfer between importations, a lack of accommodation on site, the insufficient

information regarding design and costing of the avian facility provided to date, and a lack of response by DAFF PEQ staff to legitimate design and capability concerns raised by the poultry industry and others at consultation sessions since 2010.

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