

CHAPTER TWO

NATIONAL OVINE JOHNE'S DISEASE PROGRAM

Background

2.1 As discussed in Chapter One, Ovine Johne's Disease was first detected in New South Wales during the early 1980's and was subsequently diagnosed in Victoria in 1996. The disease was detected on Flinders Island (Tasmania) in 1996 and on Kangaroo Island (South Australia) in 1998.

2.2 During the mid-1990's, the rapid spread of the disease and the lack of effective control mechanisms led a number of state governments to set up their own OJD control programs. In October 1996, the NSW Government introduced its *Sheep Johne's Disease Strategic Plan 1996-2005*, and later that year the Victorian Government introduced its own OJD program which was based on a policy of eradication through de-stocking and included the provision of compensation.

2.3 During the same period, sheep industry organisations, government agencies and other key stakeholders began to recognise the need for a more co-ordinated, national approach to the control of OJD. In 1995, in response to increased expressions of concern amongst sheep producers, the NSW Farmers' Association formed the Johne's Disease Sheep Industry Steering Committee. The Steering Committee represented a cross-section of the sheep industry at both the state and federal level and its focus was on control and possible eradication strategies for OJD. In August 1996 the Steering Committee published its Strategic Plan for 1996-2005. The Plan was based on six key programs:

- 1) a market assurance program to provide a means for sheep breeders to certify the disease status of their sheep for sale;
- 2) a regulatory program to prevent further spread of the disease;
- 3) an advisory program to assist producers to avoid infection;
- 4) a technical and financial support program to assist affected producers to eradicate the disease from their infected properties;
- 5) a disease surveillance program to determine the extent of sheep JD infection over time; and
- 6) a research program.¹

1 *NSW Sheep Johne's Disease Strategic Plan 1996-2005*, developed by the Johne's Disease Sheep Industry Steering Committee, August 1996, p. 3.

2.4 The Steering Committee's 1996 Strategic Plan makes particular mention of the fact that a disease such as OJD could only be controlled with the full support of the majority of infected producers. It was also argued that "only those producers with significant annual losses will de-stock voluntarily, without financial assistance"² and that the successful eradication of OJD would only be possible "if financial assistance is available to assist the owners of infected flocks to eradicate the disease from their properties."³

2.5 In 1997, the Australian Animal Health Council Ltd (AAHC), the Sheepmeats Council of Australia, the Wool Council of Australia and state government agencies developed a proposal for a nationally funded OJD program. Later that year, the decision was taken not to support the national program. Again, the issues of funding and compensation were sticking points; as was the lack of clear information about the extent of OJD in Australia.⁴

The Hussey-Morris Report

2.6 Although key stakeholders were experiencing difficulty in reaching a consensus about the most appropriate course of action to take in relation to OJD, there was general agreement that OJD had become a national problem and that something needed to be done. The Committee notes that while there were differences of opinion about the specific course of action required, none of the major players were suggesting a 'do nothing' approach.⁵

2.7 In December 1997, the then Minister for Primary Industries and Energy, Mr John Anderson, commissioned Mr Denis Hussey and Dr Roger Morris to assess "the merit of a national OJD control and eradication program and the case for an immediate, or subsequent, commitment by the Commonwealth Government to such a campaign".⁶ The terms of reference for the study stated that the consultants should also:

- jointly review the information and studies prepared in relation to the adoption of a national approach to the eradication of OJD in Australia; and

2 *NSW Sheep Johne's Disease Strategic Plan 1996-2005*, developed by the Johne's Disease Sheep Industry Steering Committee, August 1996, p. 1.

3 *NSW Sheep Johne's Disease Strategic Plan 1996-2005*, developed by the Johne's Disease Sheep Industry Steering Committee, August 1996, p. 2.

4 NSW Agriculture, *NSW Agriculture Ovine Johne's Disease Policy Manual*, 17 August 1999, p.2.

5 Hussey, D, and Morris, R., *Ovine Johne's Disease. A Report to The Hon. John Anderson, MP, Minister for Primary Industries and Energy*, Canberra, 31 January 1998, pp. 3-4.

6 Hussey, D, and Morris, R., *Ovine Johne's Disease. A Report to The Hon. John Anderson, MP, Minister for Primary Industries and Energy*, Canberra, 31 January 1998, Attachment 2, p. 1.

- consult key stakeholders in accordance with a program to be co-ordinated and facilitated by Livestock and Pastoral Division of the Department of Primary Industries and Energy (DPIE).⁷

2.8 The Hussey-Morris Report concluded that in order to develop an effective OJD control program, more information was needed about the epidemiology of the disease and the extent of its spread. The review stressed that at the same time as investigating whether eradication is technically and economically feasible, it is important to limit the spread of OJD.

2.9 The Hussey-Morris Report also recommended that:

- a nationally co-ordinated program of combative and research action be pursued with Commonwealth involvement;
- the Commonwealth provide the leadership and co-ordination necessary for successfully implementing the proposed approach, and contribute to this national program by resourcing functions and activities associated with fulfilling this role; and
- milestones be set for the end of 2000, and the end of 2003, and that the Commonwealth decide the nature and extent of its further involvement in the light of conclusions from a review which should be undertaken on completion of the defined program.⁸

2.10 At the Agriculture and Resource Management Council of Australia and New Zealand (ARMCANZ) meeting in February 1998, it was agreed to develop a national approach to OJD based on the recommendations of the Hussey-Morris Report.

2.11 Following the February 1998 meeting, the Australian Animal Health Council (now Animal Health Australia) was asked by ARMCANZ to co-ordinate the development of a business plan for the national program. Animal Health Australia was also asked to implement an interim surveillance and research program. The Interim Surveillance and Research Program (ISP) operated between 1 April and 20 September 1998. One of the ISP's primary tasks was to identify the distribution of OJD infection - particularly within New South Wales.⁹

National Ovine Johne's Disease Control and Evaluation Program (NOJDP)

2.12 In March 1998, Animal Health Australia appointed the National Ovine Johne's Disease Committee (NOJDC) to prepare an operational plan for the control of

7 Hussey, D, and Morris, R., *Ovine Johne's Disease. A Report to The Hon. John Anderson, MP, Minister for Primary Industries and Energy*, Canberra, 31 January 1998, Attachment 2, p. 1.

8 Hussey, D, and Morris, R., *Ovine Johne's Disease. A Report to The Hon. John Anderson, MP, Minister for Primary Industries and Energy*, Canberra, 31 January 1998, Summary and Recommendations.

9 NSW Agriculture, *NSW Agriculture Ovine Johne's Disease Policy Manual*, 17 August 1999, p.3.

OJD based on the principles of the Hussey-Morris Report. The National Ovine Johne's Disease Control and Evaluation Program (referred to as the National OJD Program) commenced in late 1998.

2.13 The stated aims of the National OJD Program are:

- a) to provide, during a research and evaluation period and by 31 July 2004, sufficient information to allow an informed decision on the national management of OJD, and especially on the feasibility and cost-effectiveness of eradication; and
- b) to control OJD during the research and evaluation period.¹⁰

2.14 Animal Health Australia (AHA) is responsible for the administration, co-ordination and management of the National OJD Program. AHA also receives advice regarding OJD from the National Johne's Disease Industry Liaison Committee (NJDILC).

2.15 Although AHA manages the National OJD Program, other than communications, it is not involved in the delivery of operational activities. Under the Deed of Agreement (which was signed by Commonwealth and state governments and the sheep industry at a national level in March 1999) operational activities are an agreed responsibility of state and territory governments.

2.16 Animal Health Australia sees its role as being the manager of a national program which will provide the information necessary for making future decisions about control and eradication of ovine Johne's disease. AHA's submission described the aim of the program as follows:

The NOJDP aims to investigate the feasibility of eventual eradication of ovine Johne's disease in Australia and to deliver a solid basis for a future decision on the most appropriate course for dealing with the disease. At the same time the NOJDP aims to maintain control of OJD nationally and compliment programs managed by the states.¹¹

2.17 In evidence, AHA re-stated the aims of the Program (as listed above) and stressed that they continue to be the "cornerstone of the program".¹² AHA also stressed that:

... the aim of this national program at the moment is not to eradicate the disease but to evaluate it and control it¹³

10 *Submission 80*, Department of Agriculture, Fisheries and Forestry, p. 7.

11 *Submission 50*, Animal Health Australia, p. 3.

12 *Evidence*, Animal Health Australia, p. 396.

13 *Evidence*, Animal Health Australia, p. 396.

2.18 The submission provided to the Inquiry by Agriculture, Fisheries and Forestry Australia (AFFA) also described the Program in terms of it being an opportunity to gather more information on which to base future decisions in relation to the management of OJD. AFFA also stressed that the National OJD Program "is not, as it is sometimes incorrectly referred to, an eradication program".¹⁴

2.19 The more specific objectives of the National OJD Program (listed below) are an extension of its aims.

- 1) To evaluate existing and potential methods for detecting, controlling and eliminating *Mycobacterium paratuberculosis* (the bacteria that causes OJD) in infected sheep flocks and properties.
- 2) To evaluate and define the extent of infection of OJD nationally.
- 3) To minimise further spread of OJD during the evaluation period.
- 4) To implement an effective and efficient management structure for the Program.
- 5) To communicate effectively and efficiently the objectives, processes and outcomes of the Program to ensure the Program achieves its objectives.¹⁵

Cost of the National OJD Program

2.20 In developing the budget required for the National OJD Program, the costings were divided into two components: a 'research' component and a 'combative' (or operational) component.¹⁶

2.21 The Centre for International Economics (CIE) was commissioned by AHA to provide advice on funding arrangements for the National OJD Program. It was determined that the research and development component be funded by industry to a level of 50% (by increasing the National Research Levy on sheep transactions) and the other half of the funding would be provided by the Commonwealth.¹⁷

2.22 The CIE also proposed that the combative component should be funded on the 'beneficiary pays' principle "recognising that governments have a responsibility for animal health matters under the constitution".¹⁸ Because OJD is an endemic disease it

14 *Submission 80*, Department of Agriculture, Fisheries and Forestry, p. 7.

15 *Submission 50*, Animal Health Australia, p. 4.

16 Animal Health Council Ltd, *National Ovine Johne's Disease Control and Evaluation Program, Business Plan 1998/99 to 2003*, p. v.

17 Animal Health Council Ltd, *National Ovine Johne's Disease Control and Evaluation Program, Business Plan 1998/99 to 2003*, p. v.

18 Animal Health Council Ltd, *National Ovine Johne's Disease Control and Evaluation Program, Business Plan 1998/99 to 2003*, p. v.

was determined that state governments should take prime responsibility for providing the public funding. It was argued that state industry contributions should be raised via a state stamp duty or a similar levy on sheep transactions. It was argued that the Commonwealth also had a role - particularly in relation to international issues and matters of quarantine.¹⁹

2.23 The estimated total cost of the National OJD Program is \$40.1 million. Included in this cost is approximately \$10.5 million for research, \$18 million for surveillance and \$7.5 million for financial incentives for producers who de-stock their properties and purchase disease free sheep.²⁰

2.24 The National OJD Program is divided into four strategic program areas. Components of the programs are funded to varying degrees by the Parties to the Deed of Agreement, including the Commonwealth, state governments as well as state and national industry.

Research and Development

2.25 As determined by the CIE, the Research and Development component of the National OJD Program is funded jointly by national industry and the Commonwealth Government to a total of \$10.5 million.

2.26 Research initiatives to date have targeted the areas of on-farm detection and management as well as the detection, diagnosis and control of OJD at a regional level. The research has involved both on-farm and laboratory trials.

2.27 Research conducted as part of the program has included:

- The development of a "tracer weaner model" to enable for rapid and cost-effective assessment of on-farm survival of the causative bacteria and strategies to eradicate the bacteria from a paddock by de-stocking;
- further development of the Pooled Faecal Culture (PFC) test so it can be used as a diagnostic test in all states;
- evaluation of on-farm disease management strategies including eradication (15 month de-stocking), vaccination, weaning strategies and artificial insemination; and
- evaluation of the sensitivity of abattoir surveillance for use in the surveillance program.²¹

19 Animal Health Council Ltd, *National Ovine Johne's Disease Control and Evaluation Program, Business Plan 1998/99 to 2003*, p. v.

20 *Submission 50*, Animal Health Australia, p. 4.

21 *Submission 50*, Animal Health Australia, p. 4. and Animal Health Australia, *Mid Term Review of the National Ovine Johne's Disease Control and Evaluation Program*, May 2001, pp. 29-33.

Operations

2.28 The Operations component of the Program is financed jointly by the sheep industry (at both the state and national level) and the state and Commonwealth governments. The Operations component of the Program includes activities such as surveillance, flock assurance, re-stocking incentives as well as zone implementation and laboratory quality control.

2.29 There has been a particular focus on tracing and on-farm investigation of flocks identified as 'suspect' or 'under surveillance' in NSW, Victoria and South Australia. The implementation of abattoir surveillance activities across all states during 2000 has also allowed for a larger cross-section of flocks to be assessed, which has provided more useful data regarding the distribution of OJD on a national level.

2.30 In addition to abattoir surveillance, activities undertaken as part of this component include:

- The finalisation of criteria in relation to disease control zones and the establishment of the zones;
- the provision of flock assurance subsidies. (This has enabled producers in residual zones who traditionally trade to areas now designated control zones to claim their testing costs);
- the provision of financial assistance to producers participating in Trial 1.1 - a 15 month de-stocking evaluation, and
- the allocation of funds to implement national laboratory quality control measures.²²

Management

2.31 The national management component of the Program is funded in equal shares by the Commonwealth, national industry and each of the states. The funding covers activities such as:

- Management Committee meetings to address program issues;
- bi-monthly reports to the Board of Animal Health Australia;
- an independent audit of the administration of the NOJDP;
- reports to ARMCANZ and the national sheep industry; and

22 *Submission 50*, Animal Health Australia, pp. 6-8, and Animal Health Australia, *Mid Term Review of the National Ovine Johne's Disease Control and Evaluation Program*, May 2001, pp. 29-33.

- an independent review of the Research and Development and Surveillance components of the program.

Communications

2.32 Funding for the Program's communications component is being provided jointly by the states and national industry. Expenditure on communications has included:

- The commissioning of a report on the needs of a National OJD Communications Program. (The report was completed in August 1999);
- the implementation of the National OJD Communications Program. This included the placement of advertorials on a national basis, the development of a radio awareness campaign as well as the distribution of a briefing kit;
- the development of the Johne's Disease Information Centre, which is accessed via the Animal Health Australia website. (The information provided on the site includes information on OJD, the National OJD Program, how to manage OJD, and the Market Assurance Program. Regular progress reports on the Program are also posted to this site); and
- the development and support of State Communication Plans prepared by state and territory governments.²³

The Commonwealth View

2.33 The Commonwealth Department of Agriculture Fisheries and Forestry indicated that they remain supportive of the National OJD Program. The Department stated that although they have had some input into the Program, its main role has been the provision of support through various advisory committees. AFFA also acknowledged that the Commonwealth has not taken the national leadership and co-ordination role it had under previous programs such as the Brucellosis and Tuberculosis Eradication Campaign (BTEC).²⁴

2.34 AFFA's evidence to the Inquiry stated very clearly that the responsibility for managing animal health programs such as NOJDP is now the role of Animal Health Australia and that responsibility for operational aspects of the Program rests with the states. The Commonwealth's responsibility in relation to the NOJDP was summarised as follows:

Commonwealth involvement in endemic disease control programs, such as the NOJDP, is now limited to its specific funding obligations under the program, the collection of levies on a national basis in accordance with

23 *Submission 50*, Animal Health Australia, pp. 6-8, and Animal Health Australia, *Mid Term Review of the National Ovine Johne's Disease Control and Evaluation Program*, May 2001, pp. 29-33.

24 *Submission 80*, Department of Agriculture Fisheries and Forestry, p. 3

national industry requests and the provision of policy, scientific and technical advice.²⁵

2.35 AFFA argued that the issue of financial assistance for affected producers needs to be addressed. The Department also made it clear however, that the responsibility for financial assistance does not rest with the Commonwealth:

Under the deed of agreement, financial assistance for affected producers who participate in the NOJDP is the responsibility of sheep producers within the state where the infected properties are located. This approach was agreed when the deed was negotiated in 1998.

2.36 The Commonwealth views OJD as a disease which does cause production losses but has no major effect on the national economy or international trade. It is also seen as having no effect on human health or the environment. AFFA argue that under these circumstances, industry and state governments have prime responsibility for funding assistance under the National OJD Program.

2.37 The Commonwealth's areas of responsibility were identified as being a share of funding for both research and development and national management.²⁶ The Commonwealth's financial contribution to NOJDP is a total of \$9.3 million over six years. The funding includes \$5.25 million for research and development activities which will be funded from a Commonwealth contribution to sheep industry research and development through Meat and Livestock Australia. The remaining \$4.05 million will finance surveillance and national management activities.²⁷

2.38 AFFA stressed the importance of the Mid-Term Review and argued that it was important for the Review Team to consider "alternative approaches":

AFFA is of the view that it would be sensible for the mid-term review to consider alternative approaches, such as co-regulation, to control the disease over the remainder of the program. Co-regulation would involve a more industry managed and market driven approach, supported by a vendor declaration with legislative backing.

The Industry View

2.39 The Committee notes that the views of sheep industry organisations differ regarding the most effective way to control and manage Ovine Johne's Disease, both in the short and long term. During the Inquiry however, it became clear that the two issues of major concern to industry have been the implementation of control regulations under NOJDP and the lack of financial assistance for producers.

25 *Submission 80*, Department of Agriculture Fisheries and Forestry, p. 3.

26 *Evidence*, Department of Agriculture, Fisheries and Forestry, pp. 422 & 423.

27 *Evidence*, Department of Agriculture, Fisheries and Forestry, p. 421.

New South Wales Farmers' Association

2.40 The New South Wales Farmers' Association indicated that they were supportive of the current National OJD Program. The Association did, however point to what it sees as inequities in relation to funding. It was argued very strongly that OJD is disease of national significance and although a national program has been set up to deal with OJD, New South Wales producers were currently carrying the major part of the financial burden.²⁸

Sheepmeat Council of Australia

2.41 The Sheepmeat Council of Australia, a signatory to the Deed of Agreement, indicated that while there had been some opposition to the NOJDP and the related control measures, the majority of producers continued to support the Program. The Council's submission stated that its members "remain strongly committed to achieving the NOJDP objectives";²⁹ that the current control measures are seen as important; and that from a national industry perspective, the protection of disease-free flocks is a "crucial outcome".³⁰

2.42 The Sheepmeat Council indicated that it had a particular interest in managing the spread of OJD in Australia. In evidence, the Director of the Council, Mr Peter Klein stressed that Australia is currently free from a number of major diseases which are endemic in other countries. Whilst Mr Klein acknowledged that he was unaware of any major markets which impose barriers because of OJD infection, he argued that Australia's disease-free status provides the Australian sheep industry with a competitive advantage which could be further enhanced if OJD can be successfully managed.³¹

Wool Council of Australia

2.43 The Wool Council of Australia indicated that although it had identified a number of problems in relation to the NODJP's reporting and accountability procedures, the Council strongly supported the continuation of the National OJD Program.

2.44 The Wool Council made particular note of the difficulties being experienced in reaching consensus on the issue of financial assistance. It also stressed that there was an urgent need to develop a risk based management approach. More specifically, it was argued that the approach required is one which makes determining the disease status of 'suspect' and 'under-surveillance' properties less difficult.³²

28 *Evidence*, New South Wales Farmers' Association, p. 320.

29 *Submission 35*, Sheepmeat Council of Australia, p. 1.

30 *Submission 35*, Sheepmeat Council of Australia, p. 5.

31 *Evidence*, Sheepmeat Council of Australia, p. 331.

32 *Evidence*, Wool Council of Australia, p. 377.

2.45 In evidence, Mr Michael Nicholls, also expressed the view that the National OJD Program should have a national focus:

I have a philosophical view that if you are going to run a national program it needs to be a national program, and you cannot run a national program that has very significant elements of state responsibility - and particularly so if you do not give state industries the capability to deal with it.³³

Market Assurance Program (MAP)

2.46 The National Johne's Disease Industry Liaison Committee was responsible for the development of a voluntary market assurance program for producers - SheepMAP. The Australian Johne's Disease Market Assurance Programs (MAPS) are seen as a key strategy in the control of Johne's Disease in Australia.

2.47 Flocks participating in the current SheepMAP program are tested to determine their OJD status and then managed to minimise the risk of infection. Over a period of four years, flocks are able to progress from Monitored Negative 1 (MN1) to the highest level of assurance - Monitored Negative 3 (MN3).

2.48 According to information published by Animal Health Australia, SheepMAP is designed to:

- provide a pool of low-risk replacement animals for those herd and flock owners who want to avoid introducing infection, including properties restocking after an eradication program;
- allow individual flocks and herds in high prevalence areas to demonstrate their low-risk status so that they can sell replacement animals; and
- facilitate the movement of low-risk animals between Zones.³⁴

2.49 SheepMAP is regarded as being a critical element of the National OJD Program because it is designed to identify flocks with a low risk of being infected, as a source of disease free sheep for commercial producers and as replacements for infected flocks undergoing eradication.³⁵

Zoning

2.50 The incidence of OJD is highly variable across Australia. As described in Chapter One, the prevalence of OJD varies considerably both between and within

33 Evidence, Wool Council of Australia, p. 378.

34 Animal Health Australia, National Johne's Program, *The New Market Assurance Programs for Johne's Disease, CattleMAP and SheepMAP 2000*, p. 1.

35 Sergeant, Dr. E., *Epidemiological assessment of ovine Johne's disease in New South Wales*, prepared for NSW Agriculture, February 2001, p.2.

state boundaries. There are also considerable differences in the nature of official disease control activities in particular areas.

2.51 The National OJD Program uses a system of disease control zones to classify areas of a particular disease status. The control zones are defined using criteria detailed in the Standard Definitions and Rules for Ovine Johne's Disease - the standard set of rules used to define and manage OJD. The control zones, as defined by the SDR's and approved by SCARM/ARMCANZ, are representative of the risk of OJD infection being present in, and spreading from, a specifically defined area (zone).

2.52 The disease control zones defined under the National OJD Program were designed to provide a means for controlling the movement of sheep. Zoning is intended to provide a way for protecting the status of the receiving zone and provide a set of documented objectives by which improvements in status can be measured and recognised nationally.

2.53 It was also intended that zoning provide a means for ensuring that any restrictions on livestock movements were justified and had the minimum impact on trade.

2.54 The following is a summary of the agreed definitions of each zone:

Residual Zone	OJD is endemic (common/widespread) and notifiable. Movement restrictions are enforced. Vendor declarations may be used as a voluntary movement control and there is no restriction into the zone.
Control Zone	OJD is notifiable and may be present in a manageable number of defined areas or in flocks where OJD has recently been introduced. An approved monitoring program is in place and thorough investigation of all known or suspected infection is undertaken. There are movement controls into the zone and infected or suspect flocks are subject to movement and control measures.
Protected Zone	OJD is at an extremely low level (if any) and is notifiable. Thorough investigation, quarantine and education programs operate in conjunction with movement restrictions.
Free Zone	Meets the requirements for a Protected Zone, but there are no infected or suspect flocks and other susceptible animal populations have been evaluated. ³⁶

Timeframe for the National OJD Program

2.55 The National OJD Program is a six-year program. The Business Plan was developed using the recommendations from the Hussey-Morris Report which recommended two three-year periods for activity and review. Following consultation, the Program was agreed to and the Deed of Agreement between the funding parties and Animal Health Australia was signed in August 1998.

2.56 The agreed timeframe for the Program is August 1998 to 31 July 2004. It is a requirement of the NOJDP's Deed of Agreement that a mid-term review be conducted after the first three-years of the Program's existence. The first review is based on the period from August 1998 to 31 July 2001 and the final review is scheduled to occur at the completion of the Program in 2004.³⁷

2.57 Animal Health Australia argued that the implementation of a National OJD Program based on the recommendations of the Hussey-Morris Report received support from all the relevant stakeholders. AHA also indicated that although there were some initial delays in the implementation of the Program "it appears well positioned to deliver the required outcomes within the original timeframe".³⁸

2.58 Animal Health Australia also stated that:

The mid-term review, in 2001, will provide all Parties with an opportunity to objectively assess progress of the program and judge the suitability of continuing the NOJDP for a further three years.³⁹

Mid-Term Review

2.59 The Mid-Term Review Team began its review in February 2001 and released its report on 3 June 2001. The purpose of the review was to examine whether the National OJD Program was on target to meet its objectives. The review team also examined whether the Program's objectives are still relevant, achievable and supported by the stakeholders.⁴⁰

2.60 The Mid-Term Review was Chaired by Emeritus Professor John Chudleigh, former Dean of the Orange Agricultural College. The Review Team also included Emeritus Professor Malcolm Nairn and The Hon. John Kerin.

2.61 A more detailed account of the Mid-Term Review process and its recommendations are provided in Chapter Eight.

37 *Submission 50*, Animal Health Australia, p. 4.

38 *Submission 50*, Animal Health Australia, p. 16.

39 *Submission 50*, Animal Health Australia, p. 16.

40 Animal Health Australia, Fact Sheet, *NOJDP Mid-Term Review*, February 2001, p.1.

