

The Senate

Rural and Regional Affairs and
Transport Legislation Committee

Biosecurity Australia's Import Risk Analysis for Pig Meat

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CHAPTER ONE

Introduction

1.1 On 16 December 2003 the Senate Rural and Regional Affairs and Transport Legislation Committee agreed to inquire into the administration of Biosecurity Australia with particular reference to the Draft Import Risk Analysis (IRA) report on pig meat. Following the release of the final IRA report on pig meat, the Committee, on 2 March 2004, amended its terms of reference to add the final IRA report to its inquiry.

1.2 The Committee's terms of reference are:

To inquire into and report on the administration of Biosecurity Australia with particular reference to the assessment, methodology, conclusions and recommendations contained in the Draft and Final Import Risk Assessment Analysis Reports on the Generic Import Risk Analysis for Pig Meat, dated August 2003 and February 2004 and related matters.

1.3 The Committee initiated the inquiry under standing order 25(2)(b). Standing order 25(2)(b), in part states:

The legislation committees shall inquire into and report upon ... and the performance of departments and agencies allocated to them.

Import Risk Analysis Reports

1.4 The Committee, or its predecessors, have considered the work of Biosecurity Australia (and previously the work of the Australian Quarantine and Inspection Service – AQIS) on a number of the import risk analysis reports (see Appendix 1). These IRAs are prepared in accordance with Australia's responsibilities as a member of the World Trade Organisation (WTO). The WTO agreements¹ set the guidelines for trade between member nations.

1.5 One of the principles of the agreements is that quarantine controls should not act as a quasi-barrier to trade. Under the terms of the Agreement on the Application of Sanitary and Phytosanitary (SPS) Measures (SPS Agreement), member countries can take the sanitary or phytosanitary measures necessary to protect human, plant and animal life or health. They also are required by the terms of the agreements to adopt the least trade restrictive quarantine measures possible. These measures must be scientifically based and applied in a non-discriminatory and consistent manner.

1 The primary agreements relating to quarantine regimes are the General Agreement on Tariffs and Trade (GATT), the Agreement on Technical Barriers to Trade (TBT) and the Agreement on the Application of Sanitary and Phytosanitary (SPS) Measures.

1.6 The SPS Agreement allows a level of protection that is consistent with a scientific justification but stresses that any measures applied by member countries should be based on international standards, recommendations or guidelines. Member countries can set a higher level of protection if there is an assessment the risk to the environment or industry requires it². Such a determination is the "Appropriate Level of Sanitary or Phytosanitary Protection" (ALOP). Australia, because of its unique status of disease and pest incidence, has a recognised conservative approach to its ALOP.

1.7 The SPS Agreement also sets out the factors that are to be considered in making a risk assessment. These are:

- available scientific evidence,
- relevant processes and production methods,
- relevant inspection, sampling and testing methods,
- prevalence of specific diseases or pests,
- existence of pest or disease-free areas,
- relevant ecological and environmental conditions, and
- quarantine or other treatments³.

1.8 The SPS Agreement also sets out the relevant economic factors that a Member country can take into account when making an assessment of the risk to animal or plant life or health. These factors can also be used in setting the protocol or measure to achieve "the appropriate level of sanitary or phytosanitary protection from such risk"⁴. These economic factors include:

- the potential damage in terms of loss of production or sales in the event of entry,
- establishment and spread of a pest or disease,
- the costs of control or eradication in the Territory of the importing Member and
- the relevant cost effectiveness of alternative approaches to limiting risks⁵.

1.9 Biosecurity Australia's decision to conduct an import risk assessment is based on whether a current import policy exists for a requested import and/or on any changes in "circumstances or scientific knowledge relating to pests and diseases"⁶. In preparing

2 Articles 3 and 5 of the SPS Agreement.

3 SPS Agreement, article 5.2.

4 SPS Agreement, article 5.3.

5 SPS Agreement, article 5.3.

6 *Committee Hansard*, 8 March 2004, p 16.

IRA reports, Biosecurity Australia establishes a review panel to assess the risks associated with the importation of a particular product. Having identified the risks, the panel examines, and where possible recommends, "quarantine measures to reduce those risks to meet Australia's appropriate level of quarantine protection"⁷.

1.10 Biosecurity Australia told the Committee that "in the biological context" the risk model is "the formula that risk equals likelihood times consequence ... risk is a combination of the probability that the exotic pest or disease will enter, establish or spread and cause harm and the probable extent of that harm"⁸. The protocols proposed by Biosecurity Australia are designed to lessen "the risk of entry, establishment or spread of exotic pests and diseases to a very low level." and do "not attempt to create a zero risk approach"⁹.

1.11 In 2003, Biosecurity Australia released a revised edition of the *import risk analysis handbook* (the handbook). The handbook, in Chapter 3, outlines the administrative steps undertaken in an import risk analysis. It indicates that science underpins the analysis. Economic issues are only addressed "in relation to matters arising from the potential direct and indirect impact of pests and diseases that could enter, establish or spread in Australia as a result of importation"¹⁰.

1.12 The importance of the scientific basis is reiterated in Biosecurity Australia's evidence – "The IRAs we conduct are based solely on science"¹¹. There is also an acknowledgement that it is "an evolving science" which is influenced by the "jurisprudence from SPS cases in the WTO"¹². The influence is on both the conduct and documentation of the risk assessments including the "standards for scientific analysis"¹³.

Pig Meat IRA

1.13 Work on the IRA commenced in 1998¹⁴.

1.14 The IRA report sets out the work of the risk analysis review panel (the Panel). The Panel was established to conduct a risk analysis following requests from Brazil, Canada, Chile, the European Union member states, Hungary, Korea, Mexico, New Zealand, South Africa, Taiwan and the United States to access Australian markets for

7 *Committee Hansard*, 8 March 2004, p 17.

8 *Committee Hansard*, 8 March 2004, p 17.

9 *Committee Hansard*, 8 March 2004, p 17.

10 Department of Agriculture, Fisheries and Forestry – Australia: *Import risk analysis handbook*, Canberra 2003, p 9.

11 *Committee Hansard*, 8 March 2004, p 17.

12 *Committee Hansard*, 8 March 2004, p 17.

13 *Committee Hansard*, 8 March 2004, pp17 and 18.

14 *Committee Hansard*, 9 February 2004, p 1.

pig meat¹⁵. It defines pig meat as "porcine muscle tissue, blood confined to muscle vasculature, bone and bone marrow, and any other tissues (for example, lymph nodes, skin, nerves) that may be considered inseparable from muscle."¹⁶.

1.15 As well as identifying the current import policy for pig meat, the report lists the 28 disease agents that were identified by the Panel as requiring consideration. These diseases were considered at a public meeting to discuss a *Technical Issues Paper*. The Issues Paper was released on 8 January 2001¹⁷.

1.16 Two diseases were subsequently identified as not requiring further consideration. The Panel examined the quarantine risks of "26 disease agents"¹⁸ that were of concern. For each of these agents the "unrestricted risk of entry, establishment and/or spread"¹⁹ of the disease was examined.

1.17 The IRA indicates that determinations are made on:

- The likelihood that a pathogenic agent will enter Australia – a "release assessment";
- The likelihood that susceptible animals will be exposed – an "exposure assessment"; and
- The likelihood of establishment and/or spread and the biological and economic consequences of introducing a pathogenic agent – a "consequent assessment".

The combination of the likelihoods and consequences – the "risk estimation" – finalises the risk assessment for each identified agent²⁰.

1.18 The methodology for the risk analysis was enunciated in the *Draft Methods Paper* which was released on 1 October 2002. The "release and exposure pathways ... associated with the importation of pig meat"²¹ were outlined. The major pathways identified were waste from households and food service outlets. Four groups of

15 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 3.

16 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 3.

17 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 2.

18 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 5.

19 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 6.

20 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report February 2004, p 24.

21 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 5.

animals were considered to be at risk of exposure to uncooked pig meat and therefore at risk of contamination and contributors to the spread of the diseases under consideration. These groups are feral pigs, backyard pigs, pigs from small commercial piggeries and other susceptible species such as cats, dogs and rodents²².

1.19 The Panel also examined the consequences of the spread of disease to large commercial piggeries and other animals such as horses and cattle.²³

1.20 Comments provided in relation to the *Draft Methods Paper* and *Draft IRA Report* were considered by the Panel in the preparation of the Final IRA.

1.21 The public health risk to humans is not examined by the IRA as it is outside its terms of reference. Food Standards Australia and New Zealand undertakes a risk assessment for products intended for human consumption²⁴.

1.22 The Panel found that the unrestricted entry of 10 of the 26 disease agents were above the ALOP for Australia. Risk management strategies to reduce the level of risk for these diseases were developed by the Panel to enable the entry of pig meat into Australia at the ALOP. These measures include "testing the carcass, cooking, freezing curing and removal of certain tissues or parts of the carcass"²⁵.

1.23 In accordance with the process there was a 30 day period following the release of the Final IRA report in which stakeholders could lodge an appeal. The appeals lodged were considered by the Import Risk Analysis Appeals Panel (IRAAP). The IRAAP reported within the stated 45 day period. The appeals were disallowed.

1.24 On 10 May 2004, the Director of Animal and Plant Quarantine made a determination setting out the new quarantine requirements for the importation of pig meat into Australia. These requirements reflect the conclusions and recommendations of the Final IRA report.

Work of the Committee

1.25 At the commencement of the inquiry, the Committee invited submissions from Biosecurity Australia, Australian Pork Ltd, and peak bodies in the States (see Appendix 2). The Committee also invited submissions through the press, advertising in *The Australian* on 28 January and again on 11 February 2004. In total 26 submissions were received.

22 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 5.

23 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 5.

24 Generic Import Risk Analysis (IRA) for Pig Meat - Final Import Risk Analysis Report, February 2004, p 5.

25 Generic Import Risk Analysis (IRA) for Pig Meat -Final Import Risk Analysis Report, February 2004, p 9.

1.26 The Committee held two public hearings in Canberra: one on 9 February 2004 and a subsequent hearing on 8 March 2004 following the release of the Final IRA. The submissions and transcripts are available at the parliament's website (www.aph.gov.au).

1.27 The Committee considered the report at meetings on 11 and 12 May 2004. It adopted the report at a meeting on 12 May 2004.

Acknowledgments

1.28 The Committee appreciates the time and work of all those who provided oral and written submissions to the inquiry. Their work has assisted the Committee considerably in its inquiry.

CHAPTER TWO

Introduction

2.1 During the inquiry, the Committee was made aware of several concerns, both with the methodology and the proposed risk management strategies for two specific diseases – post-weaning multisystemic wasting syndrome (PMWS) and porcine reproductive and respiratory syndrome (PRRS). This chapter focuses on the issues raised and provides the Committee's comment.

Issues

Methodology

2.2 A number of submissions raised concerns about the methodology used by the Review Panel (the Panel) in establishing the risks posed by the importation of pig meat. In particular, there was concern expressed about the Panel's calculation of the likelihood of a disease entering Australia. These concerns include:

- qualitative and quantitative calculations;
- the use of the 50 rather than 95 percentile;
- the annual basis of the calculation; and
- the basis for consequence assessments.

Qualitative and quantitative calculations

2.3 The Panel used a combination of both qualitative and quantitative calculations in preparing the IRA. The use of both calculations has attracted criticism.

2.4 The European Union (EU) in their submission say, the evaluations for PRRS and PMWS:

while claiming to be done on a quantitative scientific basis, is in fact based on a qualitative appraisal of risk which is then translated into a quantitative value, then re-translated back into a qualitative release risk estimate. The bands of probability used for qualitative categorisation are broad, and each translation from qualitative to quantitative risk and back multiplies this error.¹

1 Submission No 11, European Union – Delegation of the European Commission to Australia and New Zealand.

2.5 As well as the claim that the methodology does not conform with international protocols, the EU submission states the process has resulted in an "inflated release risk assessment"²

2.6 The EU's concerns over conversions from one approach to the other creating errors are echoed in Australian Pork Ltd's submission. In their discussions of the annual likelihood of entry and exposure estimates:

Regarding the total release likelihood (R_tot) distribution, APL has difficulty in identifying the scientific justification for building a model to make precise estimates, then introducing inaccuracies by converting them to semi-qualitative figures and in turn feeding them back into the model to produce more precise estimates.³

2.7 The qualitative approach is also questioned by some of the state industry bodies, including the West Australian Pork Producers' Association, the South Australian Farmers Federation, the New South Wales Farmers' Federation and some submissions from those in the industry⁴.

2.8 Biosecurity Australia's draft *Guidelines for Import Risk Analysis* (Draft Guidelines) define qualitative, semi-quantitative and quantitative likelihood evaluations⁵. The following text points out the approach adopted by a review panel "will depend on both technical and practical considerations"⁶. The IRA report for pig meat details the evaluation approach taken by the Panel at each stage of the analysis and includes the assumptions made, the variables and the formula applied in quantitative calculations. Where a qualitative approach is adopted, the assessments are defined⁷.

2.9 At the hearing on 9 February 2004 the Committee explored this basis for the evaluations for the IRA for Pig Meat. Biosecurity Australia advised Committee that:

We seek to use quantitative analysis where the data permits, but there are circumstances where there is not sufficient data to use a quantitative approach and so we use a qualitative approach.⁸

2 Submission No 11, European Union - Delegation of the European Commission to Australia and New Zealand.

3 Submission No 12, Australian Pork Ltd, p 20.

4 See submissions 13, 16, 18, 19, 20, 21 and 22.

5 Biosecurity Australia *Draft Guidelines for Import Risk Analysis*, September 2001, pp 39-41.

6 Biosecurity Australia *Draft Guidelines for Import Risk Analysis*, September 2001, pp 39.

7 See for example, Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 67.

8 *Committee Hansard*, 9 February 2004, p 6.

2.10 When pressed by the Committee about whether the qualitative approach is more subjective than a quantitative approach, the Manager of Biosecurity Australia said:

I do not think that [the use of a qualitative approach in the absence of information] need affect the consistency or the approach to quarantine risk that we take.⁹

2.11 The Committee does not accept the EU's view that Biosecurity Australia's methodology does not meet those required by international standards. The methodology is based on the Code set by the Office International des Epizooties (OIE – World Organisation for Animal Health). While the Committee notes the OIE Code, on which the definitions are based, do not include a definition for semi-qualitative evaluations, it also notes the detail descriptions of the methodology set out in the Draft Guidelines. Further, the Committee is aware that Biosecurity Australia's qualitative risk evaluation matrix in the IRA on Non-viable Salmonoids and Non-salmonoid Marine Finfish, withstood the scrutiny of a WTO Appellate Body¹⁰.

2.12 Nonetheless the Committee does have concerns about the use of qualitative combined with quantitative data. These concerns were discussed by the Committee's predecessors in reports on other inquiries on IRAs. Although the discussion of the advantages and disadvantages of both qualitative and quantitative methods in the Draft Guidelines¹¹ is useful, it does not satisfy the Committee's concerns.

2.13 The Committee appreciates that Biosecurity Australia have sought to address concerns arising from the use of qualitative and quantitative data. Further it understands the problems that lack of data and information present to taking a solely quantitative approach. However, the Committee believes that more work needs to be done on this aspect of its work. Without such work, the methodology of IRAs will continue to be called into question, as it has been in the pig meat IRA.

The use of the 50 percentile

2.14 Another concern raised in the Australian Pork Ltd submission is the use of the 50 percentile over the 95 percentile. Their concern stems from the Panel's change in the use of the percentile figure suggested in the Methods Paper released in October 2002 and the draft IRA report. They contend the explanation provided by the Panel is

9 *Committee Hansard*, 9 February 2004, p 2.

10 Reported in Submission No 41 (Department of Agriculture Fisheries and Forestry) to the Senate Rural and Regional Affairs and Transport Legislation Committee's inquiry into The Proposed Importation of Fresh Apple Fruit from New Zealand, July 2001, p 30.

11 Biosecurity Australia, Draft Guidelines for Import Risk Analysis, September 2001.

"inadequate"¹². Further the use of the 50 percentile does not conform to "the use of conservative assumptions"¹³ and is therefore "inappropriate"¹⁴.

2.15 Australian Pork Ltd illustrates its concerns by referring to the impact the use of the 50 percentile has had in reducing the "overall annual risk [for PRRS] from 'Low' to 'Very Low' ..."¹⁵. In other words, the risk of entry, establishment and spread of the disease was assessed as very low (the event is very unlikely to occur) rather than low (the event is unlikely to occur).

2.16 The Committee notes the discussion in the draft Guidelines of the use of the 95 percentile. It suggests it is probable the use of the 95 percentile arises from the "convention in statistics whereby 0.05 is generally considered the benchmark for a 'significant' result."¹⁶ It continues:

In fact, simulated percentiles are not equivalent (or even similar) to the 'confidence limits' reported in statistics and if, for example a 95th percentile is to be reported, then the reason for taking this very conservative approach should be clearly stated. In the hypothetical widget semen example, reporting the 95th percentile in place of the median (50th percentile) would raise the output probability from 'extremely low' to 'very low'.¹⁷

2.17 Biosecurity Australia's own assessment is the use of a 95th percentile is a very conservative approach. It would therefore be in line with Australia's stated (in its ALOP) approach to risk. In the Committee's view any departure from the use of that percentile and the use of the 50th percentile should be clearly explained. This is particularly so when the original indication is the 95th percentile would be used in the assessment of risk for pig meat.

Annual basis of calculation

2.18 A further criticism is that the Panel calculated its assessment annually, suggesting, as the South Australian Farmers Federation argue an "apparent underestimation of the total impact of diseases"¹⁸. This view is supported by a number of other submissions including that from Mclean Farms¹⁹, West Australian Pork Producers' Association²⁰, the New South Wales Farmer's Association²¹, Swickers

12 Submission No 12, Australian Pork Ltd, p 22.

13 Submission No 12, Australian Pork Ltd, p 22.

14 Submission No 12, Australian Pork Ltd, p 22.

15 Submission No 12, Australian Pork Ltd, p 22.

16 Biosecurity Australia Draft *Guidelines for Import Risk Analysis*, September 2001, p 49.

17 Biosecurity Australia Draft *Guidelines for Import Risk Analysis*, September 2001, p 49.

18 Submission No 13, South Australian Farmers Federation.

19 Submission No 15.

20 Submission No 16.

Kingaroy Bacon Factory Pty Ltd²², Agripork Australia Ltd²³, DA Hall and Co²⁴ and Cameron Pastoral Association²⁵.

2.19 In their submission, Australian Pork Limited teases out the concern. It suggests the calculation over a one year period has the "potential to seriously distort the outcome of the risk assessment."²⁶ It argues that:

The methodology is flawed in failing to extrapolate annual exposure or outbreaks risks to the risks attendant over longer periods of imports. ...As an example, an annual likelihood of exposure of 0.027 is categorised as "very low". ... over a period of 10 years the likelihood of at least one incursion is 0.24 (low), over a period of 15 years the likelihood is 0.34 (moderate) and over a period of 50 years the likelihood is 0.75 (high).²⁷

2.20 It continues that acceptable time frames for the major diseases for pigs are in the order of 50 to 100 years. Based on a 50 year exposure time line, any annual likelihood would be required to fall within the "extremely low" or "negligible categories"²⁸ to ensure a suitable risk management strategy for the long term.

2.21 The Draft Guidelines signal that an annual calculation will be made, yet no clear reasons as to why that time period has been selected are given²⁹. The Committee understands the OIC Code "suggests that 1 year be adopted as the period ... to evaluate the effect of a projected volume of trade³⁰". Clearly an annualised projection will suggest figures that are lower than those that are projected for a longer period.

2.22 Australian Pork's consultant statistician told the Committee, that in calculating a restricted risk:

... looking over a period of 10 years – you basically just multiply by 10 the number of waste units that are going to be exposed to the different exposure groups and then run the simulations as spelt out by Biosecurity Australia. That is why you got a much bigger number ... I think the original annual likelihood was a 25 percent chance that you were going to get something if

21 Submission No 18.

22 Submission No 19.

23 Submission No 20.

24 Submission No 21.

25 Submission No 22.

26 Submission No 12, Australian Pork Limited, p 20.

27 Submission No 12, Australian Pork Limited, p 21.

28 Submission No 12, Australian Pork Limited, p 21.

29 Guidelines for Import Risk Analysis, Draft September 2001.

30 Australian Pork Limited, Submission to Import Risk Analysis Appeals Panel, Generic Import Risk Analysis for Pig Meat, dated 22 March 2004, attachment D.

you combined over all three exposure groups, whereas, within 10 years, you have a 94 percent or approximately 95 percent chance.³¹

2.23 The calculations were based on the assumption the tonnage of pig meat imported would "be identical every year."³² The Brentwood Piggery, in their submission to the inquiry argue that "the larger the quantity [of imported pork] – the larger the risk"³³. However, an increase in the volume of trade will not necessarily produce a similar increase in the risk of a particular disease entering Australia. The Committee notes that the assumed volume of trade has been increased in the final IRA "so that the quantum of quarantine risk is represented in a conservative way assuming a greater volume of trade"³⁴.

2.24 Again the Committee has concern over the methodology used in preparing the IRA. In its view, given the implications for developing risk management strategies, it is critical the overall risk assessments are accurate and based on suitable projections. The Committee accepts the arguments that the annualised calculation is not sufficient to represent the true risk.

Consequence assessments

2.25 During the inquiry, there was also criticism of the methodology used in making the consequence assessments. In its submission, Australian Pork Ltd describes these assessments as lacking "mathematical rigour"³⁵. In support of its criticism it lists six concerns including the "failure to provide rationale for the impact estimates, classification rules and look-up tables"³⁶. A number of State industry submissions echoed this concern.

2.26 The Committee examined the methodology for consequence assessment. It notes the IRA says that "According to the OIE Code, a consequence assessment should '*describe the potential consequences of a given exposure, and estimate the probability of them occurring*'. "³⁷.

2.27 Biosecurity Australia's methodology examines both direct and indirect consequences. Together the two groups "cover the *economic, environmental* and *social* effects of a disease."³⁸ The indirect consequences include new or altered eradication and control programs and also the domestic and international trade

31 *Committee Hansard*, 9 February 2004, p 24.

32 *Committee Hansard*, 9 February 2004, p 24.

33 Submission No 14, TG and FL Reed, p 2.

34 *Committee Hansard*, 8 March 2004, p 27.

35 Submission No 12, Australian Pork Ltd, p 23.

36 Submission No 12, Australian Pork Ltd, p 23.

37 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004 , p 62.

38 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 63.

aspects³⁹. This is in accordance with the provisions of the SPS agreement (see paragraph 1.7).

2.28 The Panel examined the extent of the impact on four levels and assigned an impact score designed to reflect the "magnitude of impact". The "Estimates of the consequences of the introduction, establishment and/or spread at the national, State/Territory, district/region and local level were subsequently translated to an overall score (A-G) ..."⁴⁰. The schema used to translate these estimates is outlined in a table.

2.29 The Committee considered the consequence assessment for PMWS.

2.30 In its submission, Australian Pork Ltd points out that the pork industry in Australia "generates over \$1.1 billion to household income."⁴¹ Australian pork export markets are valued at over \$228 million per year⁴².

2.31 Australian Pork Ltd notes the devastating economic impact that PMWS has had in North America and European Pork industries. It suggests the Australian "industry would be expected to lose approximately \$81 million in sales revenue, \$6.4 million in household income and forego almost \$17.6 million in value adding."⁴³

2.32 The submission also notes it has not been possible to eradicate the disease in Europe or North America⁴⁴.

2.33 The consequence assessment made by the Panel for PMWS examines four "outbreak scenarios". In each scenario the impact on eradication and control programs, domestic and international trade were examined. The ratings for each category in each scenario were such that the overall impact for all was rated as either negligible, very low or low⁴⁵.

2.34 The "estimates of the likelihood of each scenario and its consequences for each exposure group were combined"⁴⁶. This resulted in an assessment of "very low" for "the overall likely consequences associated with the exposure of feral pigs"⁴⁷.

39 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, pp 62 and 63.

40 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 64.

41 Submission No 12, Australian Pork Ltd, p 7.

42 Submission No 12, Australian Pork Ltd, p 7.

43 Submission No 12, Australian Pork Ltd, p 15.

44 Submission No 12, Australian Pork Ltd, p 11.

45 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 404.

46 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 404.

47 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 404.

2.35 Given Biosecurity Australia suggests the argument for a 10 year rather than an annual calculation of risk, while mathematically correct, "bears no relationship to reality"⁴⁸, the Committee finds these consequence assessments disturbing. The assessments appear to be neither mathematically correct nor based on "reality".

2.36 Biosecurity Australia recognises that "feral pigs are one of the most likely ways that it [PMWS] could initially get established in this country"⁴⁹. Further there is no successful eradication program and therefore there is no possibility of ridding the feral pig population of the disease. Once introduced, the consequences for the industry are significant, yet these facts are not evident in the consequence assessments in the IRA.

2.37 The Committee therefore queries the appropriateness of the methodology of the consequence assessments for the IRA. Further, the Committee also notes the accuracy of these assessments are critical to the development of suitable risk management strategies.

Risk management strategies

2.38 The Panel develops risk management strategies to mitigate the risks associated with a particular disease in imported pig meat. The strategies set out the quarantine requirements that a potential exporter must meet to have their product accepted into Australia, that is to meet Australia's ALOP. The strategies proposed for both PMWS and PRRS are subject to comment.

Post-weaning Multisystemic Wasting Syndrome (PMWS)

2.39 PMWS is a relatively new disease, having first been identified in Canada in 1996⁵⁰. Most countries currently have the disease. Professor Morris told the Committee, there are "probably at most three to six countries, including Australia – that remain free of this disease"⁵¹.

2.40 The IRA states the disease is indicated by "wasting or failure to thrive, dyspnoea, enlarged lymph nodes and, less frequently diarrhoea, pallor and jaundice"⁵². It is clearly difficult to diagnose correctly – there is no diagnostic test⁵³ and clinical signs with pathology and the "severity of the disease on the farm ... tell us whether or not we have PMWS"⁵⁴.

48 *Committee Hansard*, 9 February 2004, p 12.

49 *Committee Hansard*, 8 March 2004, p 20.

50 Submission No 12, Australian Pork Ltd, p 10.

51 *Committee Hansard*, 8 March 2004, p 2.

52 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 387.

53 *Committee Hansard*, Professor Morris, 8 March 2004, p 9.

54 *Committee Hansard*, Professor Morris, 8 March 2004, p 8.

- 2.41 The risk management strategies proposed in the IRA for PMWS are:
- Imported meat must be derived from pigs that "have been kept since birth in a country or zone free from PMWS to the satisfaction of Australian authorities"; or
 - Imported meat must not include the head and neck and major peripheral lymph nodes and must be deboned and cooked or cured. Cooking can take place either off-shore or on-shore and caveats are placed on the on-shore cooking.⁵⁵

On-shore cooking

2.42 During the inquiry, the efficacy of these strategies were questioned. One concern is the cooking requirement. Two concerns are raised. Firstly the acceptance, albeit with certain conditions, of cooking on shore.

2.43 The risk strategy provides that cooking may occur on shore if it:
occurs within the urban area of the port into which it is imported or if in a rural area is transported under appropriate secure arrangements (e.g. refrigerated container) by the most direct route from the nearest port of entry.⁵⁶

2.44 Australian Pork Ltd argues the draft IRA has provided "no basis to conclude that risks will be acceptably managed through on shore cooking"⁵⁷.

2.45 At the hearing on 8 March 2004, Biosecurity Australia pointed out that one of the changes between the draft IRA and the Final, was the clarification that cooking could take place on-shore:

The panel looked again at the equivalence between onshore and offshore. You may recall that at the last hearing we discussed the equivalence that the small extra risk posed by bringing fresh pig meat under tighter controls than currently exist for processing and cooking. It was offset by the fact that it was done here under AQIS audit—three audits a year—so they were equivalent.

The argument was put, though, that if we had the deboning and lymph node removal in this country as well, that would certainly increase the amount of waste that needed to be got rid of. The panel thought that that was a fair argument with regard to the equivalence argument. The difference in the final report says that the head off, neck off, deboning and lymph node removal has to occur offshore and it is only basically the flesh that can arrive onshore for cooking.⁵⁸

55 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, pp747-748.

56 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 7.

57 Submission No 12, Australian Pork Limited, p 16.

58 *Committee Hansard*, 8 March 2004, p 27.

2.46 On shore cooking has led to speculation that quarantine could be breached and the risks associated with any such breaches. The scenario painted in one submission "that a truck load of uncooked imported pig meat had overturned on a bridge in northern NSW and half a tonne of pig meat dropped into the Clarence River."⁵⁹ reflects the concerns associated with onshore cooking.

2.47 While the scenario may appear far fetched, it does have a real life parallel. Under the current quarantine arrangements "uncooked and uncanned pig meat may be imported from the South Island of New Zealand, Canada and Denmark."⁶⁰ The Committee is aware that in June 2002 uncooked pig meat imported from Denmark was stolen one night. It has been advised that security provisions for the storage and transportation of pig meat have been revised since the incident.⁶¹

2.48 Despite these revisions the Committee shares the reservations about cooking on-shore.

Why cooking?

2.49 The second concern arising out of the risk management strategy which includes cooking, was the purpose of the cooking.

2.50 In its submission, Australian Pork Ltd ask that Biosecurity Australia "provide a definition of the cooking schedule required for the risk management of PMWS"⁶². Its concern stems from the admission in the IRA that cooking does not "appreciably inactivate the PCV2 virus"⁶³.

2.51 In evidence the Committee discovered the purpose of cooking in the risk management strategy was to reduce the amount of waste:

the panel required cooking, not to inactivate PCV2 but to reduce the waste products coming out of households, restaurants et cetera.⁶⁴

2.52 The Final IRA also indicates that cooking as a waste reduction method would lessen the waste discarded to one tenth of that estimated without the strategy⁶⁵.

59 Submission No 3, David and Patricia Trewin.

60 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 2.

61 *Committee Hansard*, Additional Estimates, 16 February 2004, pp 36 and 37.

62 Submission No 12, Australian Pork Ltd, p 16.

63 Submission No 12, Australian Pork Ltd, p 16.

64 *Committee Hansard*, 8 March 2004, p 19.

65 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 747.

Porcine Cirivirus Type 2

2.53 Concern was also expressed about the strategy to remove certain parts of the pig prior to importation to reduce the likelihood of the entry, establishment and spread of the disease to an acceptable level. The concern is the risk management strategy is premised on an associated reduction of the presence of the porcine cirivirus type 2 (PCV2 virus).

2.54 In its submission, Australian Pork Ltd points out the PCV2 virus is present in Australia but PMWS is not. Research conducted at both Murdoch University and Elizabeth Macarthur Agricultural Institute has not proved the presence of PMWS in Australia⁶⁶.

2.55 It further says the cause of PMWS has not been established. It states:

There are three possible causes of PMWS – none of which is exclusive of either or both of the other two.

1. PMWS may be caused by a PCV2 strain or PCV2 strains which is or are not present in Australia;
2. PMWS may be caused by an unknown organism which is not present in Australian pigs but is present in the herds of PMWS affected countries; or
3. PMWS may be caused by environmental factors (eg immunisation practices).⁶⁷

2.56 In his submission, Professor Morris (a registered veterinary specialist in both pig medicine and epidemiology working on the recent PMWS outbreak in New Zealand), says that the New Zealand experience:

Is consistent with the body of overseas field evidence, that while the presence of PCV2 virus in a herd appears to be necessary for expression of this disease, a second as yet unidentified disease agent is the best available explanation for the development of PMWS and its spread through pig herds between and within countries.⁶⁸

2.57 In evidence to the Committee, Professor Morris said that:

Most of the research that has been done has been laboratory research. One of the weaknesses of that is that it has not properly investigated the field manifestations of the disease.⁶⁹

66 Submission No 12, Australian Pork Ltd, pp 11 and 13.

67 Submission No 12, Australian Pork Ltd, p 13.

68 Submission no 23, Professor Morris, p 3.

69 *Committee Hansard*, 8 March 2004, p 3.

2.58 The IRA while stating that the PCV2 virus is essential for the development of PMWS, acknowledges that other factors "are required to induce the full spectrum of clinical signs and lesions associated with advanced PMWS ...".⁷⁰

2.59 In its submission, Australian Pork Ltd argue the draft IRA addresses only the possibility that PMWS is linked with a strain or strains of the PCV2 virus that is not present in Australia. Risk assessment and management strategies are therefore skewed to addressing one form of infection, leaving other sources of potential infection open. Given the lack of understanding of the transmission of the disease, it argues article 5.7 of the SPS Agreement or the precautionary principle should be applied⁷¹.

2.60 Article 5.7 of the SPS Agreement states:

In cases where relevant scientific evidence is insufficient, a Member may provisionally adopt sanitary or phytosanitary measures on the basis of available pertinent information, including that from the relevant international organizations as well as from sanitary or phytosanitary measures applied by other Members. In such circumstances, Members shall seek to obtain the additional information necessary for a more objective assessment of risk and review the sanitary or phytosanitary measure accordingly within a reasonable period of time.⁷²

2.61 The Committee explored this option with Biosecurity Australia at the hearing on 8 March 2004:

Senator O'BRIEN—So using article 5.7, we could, for example, impose a ban on the importation of a product whilst we went about assessing a particular risk. Is that a fair understanding?

Ms Harwood—Theoretically, yes, although there is a body of scientific evidence surrounding the diseases of concern.

Senator O'BRIEN—But we have also heard some evidence—and I think you are backing it up to an extent—that there is not yet enough knowledge to clearly identify the vector for the disease.

Ms Harwood—Yes, but it is arguable whether a ban is the least trade restrictive way of dealing with that quarantine risk, even in that circumstance.

Senator O'BRIEN—But article 5.7 does not require the least trade restrictive measure, does it?

Ms Harwood—It is subject to the disciplines of the SPS agreement overall.⁷³

70 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 386.

71 Submission No 12, Australian Pork Ltd, P 14.

72 SPS Agreement as contained in Biosecurity Australia import risk analysis handbook, p 34.

73 *Committee Hansard*, 8 March 2004, p 25.

2.62 The Committee notes the WTO Appellate Body decision of 23 November 2003. That decision upheld the WTO's Panel's findings relating to the provisions of 5.7 of the SPS Agreement to Japan's Measures Affecting the Importation of Apples.

176. In Japan –Agriculture Products II, the Appellate Body sets out four requirements that must be satisfied in order to adopt and maintain a provisional phytosanitary measure. These measures are:

- (i) the measure is imposed in respect of a situation where 'relevant scientific evidence is insufficient';
- (ii) the measure is adopted 'on the basis of available pertinent information';
- (iii) the Member which adopted the measure 'seek[s] to obtain the additional information necessary for a more objective assessment of the risk'; and
- (iv) the Member which adopted the measure 'review[s] the ... measure accordingly within a reasonable period of time'.⁷⁴

2.63 Further, the Committee notes Biosecurity Australia's comments the Panel took a very conservative approach to the assessment of PMWS:

Firstly, we assumed that PMWS was triggered by an infectious agent. As we have heard today, that is not proven. Secondly, we assumed that the trigger for PMWS could be transmitted in pig meat. There is no definitive evidence of that at all. Thirdly, if pig meat is infective, then it could either be through the presence of an as yet unknown agent, such as agent X, which Roger Morris was talking about, or it could be due to a variant, more pathogenic, strain of porcine cirovirus type 2 that we already have in this country, which is another thing that Roger Morris mentioned. There is not any conjecture between us on that.⁷⁵

2.64 While the Committee accepts that the Panel has been thorough in both its research and its approach it is also aware of Biosecurity Australia's acknowledgment that

PMWS is an emerging disease. There are a number of features about it that are not known.⁷⁶

2.65 This coupled with Professor Morris's evidence gives the Committee concern:

Senator O'BRIEN—If I understand you correctly, in terms of its work on PMWS you think the import risk assessment panel's findings are unsafe?

Prof. Morris—I believe they do not adequately reflect the current state of both knowledge and uncertainty. They reflect adequately the published

74 Viewed at <http://docsonline.wto.org/GEN> on 14 April 2004

75 *Committee Hansard*, 8 March 2004, p 19.

76 *Committee Hansard*, 8 March 2004, p 18.

literature, but the situation is unfolding faster than is fully represented in the published literature.

Senator O'BRIEN—So we should not rely on it?

Prof. Morris—We should be very cautious in considering that matter. We do not know whether the cooking protocol that is proposed will be adequate to prevent this agent entering Australia. I do, however, accept that because there is a swill feeding ban in Australia there is a lower risk of this disease establishing in Australia than there was in New Zealand at the time it appears to have established here.⁷⁷

2.66 The Committee has further concern given Professor Morris's view on the change in the views as to the causes of PMWS:

Now there are relatively few people who still believe that porcine cirovirus is the sole cause of this disease or even that other factors that are widespread are significantly involved. It is becoming pretty clear that there is another agent involved.⁷⁸

2.67 Finally, in this context, the Committee notes that work on PMWS is continuing. Professor Morris told the Committee:

There is some excellent work going on in Denmark. We brought out the leading Danish expert recently to advise us on this disease. They have some very important findings which strongly support the conclusion that this disease is spreading like an epidemic, much the same as the findings that we have. There is good work going on in Denmark to try to understand this disease better. There is some work going on in the UK and obviously we are investigating this disease quite actively now in New Zealand.⁷⁹

2.68 The Committee also received at the 9 February 2004 hearing a list of Conference papers for the 2003 Allen D. Lemman Swine Conference, which signals the international prominence given to the disease.

2.69 In conclusion, the Committee supports the reservations expressed about the efficacy of the risk management strategies for PMWS. It is clear there is no established evidence on whether a pathogen or some agent or a combination of factors causes the disease. Given the continuing conjecture about the establishment of the disease, the Committee cannot accept the risk management protocols will in fact lessen the risk.

2.70 The Committee continues to be concerned by the possibility the "factor/s" is/are not reduced by either cooking or waste reduction and that diseased meat will be discarded. Swill feeding may have been a factor in the outbreak of the disease in New

77 *Committee Hansard*, 8 March 2004, p 4.

78 *Committee Hansard*, 8 March 2004, p 4.

79 *Committee Hansard*, 8 March 2004, p 4.

Zealand⁸⁰. Feral pigs are considered in the IRA as an exposure pathway for the entry of disease into Australia and they are foragers and swill feeders. Although swill feeding is illegal in Australia, the Committee learnt that it does occur:

There are a lot of other things which are illegal in this country that still occur and there have certainly been cases of swill feeding ...⁸¹

The Committee believes therefore that some of the risks cannot be addressed with the currently available scientific information.

Porcine Reproductive and Respiratory Syndrome Virus (PRRS)

2.71 PRRS is a virus which reveals in respiratory disease and increases in reproductive failure⁸². It was first noticed in the late 1980s in the United States⁸³. It is also present or has spread to most countries. Serological studies confirm Australia is free of the disease⁸⁴. Other countries believed to be PRRS free are New Zealand, Norway, Finland, Sweden and Switzerland⁸⁵.

2.72 The PRRS virus has been identified and the disease is reported as only occurring in pigs. The severity of the clinical signs is variable depending on such factors as age of the pig, the strain of the virus and whether it is the sole infectious agent. The environment and management programs also affect the severity of the disease.⁸⁶

2.73 The IRA proposes the following risk management strategies:

- Pigs before slaughter must be sourced from a country or zone that is free from PRRS and where vaccination is not permitted to the satisfaction of Australian authorities;
- Canned pig meat (the entire contents) must have been heated to at least 100 degrees C;
- Curing of the pig meat must be done in accordance with specified conditions, including curing periods; and
- Cooking (either on-shore or off-shore) of pig meat to a minimum temperature of 70 degrees C for 11 minutes⁸⁷.

80 *Committee Hansard*, Professor Morris, 8 March 2004, p 4

81 *Committee Hansard*, Australian Pork Ltd, 9 February 2004, p 20.

82 See Submission No 12, Australian Pork Ltd, p 17 and Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 271.

83 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 271.

84 Submission No 12, Australian Pork Ltd, P 17.

85 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 271.

86 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, p 274.

87 Generic Import Risk Analysis (IRA) for Pig Meat, Final Report, February 2004, pp 6 and 735.

On-shore cooking

2.74 In its submission, Australian Pork raises the issue of on-shore cooking in relation to PRRS. Australian Pork makes the point that off-shore cooking only should occur where the area is affected by both PRRS and PMWS⁸⁸. The issues are largely those that have been discussed in relation to the risk management strategies for PMWS (see paragraphs 2.42 to 2.48).

Excessively trade restrictive?

2.75 In its submission, the EU argues the risk assessments made in the IRA for a number of diseases, including PRRS, are overestimated (see paragraphs 2.3 to 2.5). Further it contends that in the "absence of scientific grounds of the proposed measures"⁸⁹, the proposed measures for PRRS are "excessively trade restrictive"⁹⁰. In particular, it is critical of the heat treatment requirements. It argues that "a more objective assessment of the risks above would lead to the conclusion the overall risk due to the importation of pig meat from areas where PRRS occurs is 'negligible'.⁹¹".

2.76 The Committee has already commented on the risk assessment methodology used by Biosecurity Australia (see paragraph 2.13). The comments made in the EU submission served to highlight the need to have the risk assessment transparent and balanced so there will be acceptance of the risk strategies. The Committee notes the importance of the interrelationship between the risk assessment and the risk management strategies. The evidence provided to the Committee by Biosecurity Australia suggests they too are aware of the relationship.

Some observations

2.77 During the inquiry the Committee also considered the conduct of the IRA. The evidence highlights two related concerns - Biosecurity Australia addressing concerns that were raised in the consultation process and the transparency of the process.

2.78 In its submission Australian Pork Ltd, points out that many of the methodological issues had been raised in submissions to Biosecurity Australia. These submissions had been made on the Issues Paper and the draft Methods Paper. Australian Pork Ltd states:

88 Submission No 12, Australian Pork Ltd, p 18.

89 Submission No 11, European Union, Attachment 1.

90 Submission No 11, European Union, Attachment 1.

91 Submission No 11, European Union, Attachment 1.

There are numerous instances where the draft IRA has failed sufficiently to adequately address specific points raised in APL's submissions leading APL to question whether those points have been considered by BA.⁹²

2.79 Australian Pork Ltd's submission also indicates the concerns raised about methodology need to be addressed if "stakeholders are to have confidence in the measures proposed."⁹³

2.80 The Committee notes Biosecurity Australia's comments throughout the inquiry about consultation with stakeholders taking place "at key milestones"⁹⁴ in the IRA process. It is clear that Biosecurity Australia sought comment at the appropriate "milestones" in the process. The Committee is therefore concerned that Australian Pork Ltd should make these comments.

2.81 While the Committee does not expect that Biosecurity Australia should accept and incorporate into the IRA all points raised during "consultation opportunities"⁹⁵ it does expect that those opportunities will be fruitful, both for Biosecurity Australia and the stakeholders.

2.82 The Committee appreciates the volume of comments may be so great and comments from different organisations may be repetitive and that considerable time and resources would be required to respond individually. However, it believes that consultation is most effective when dialogue occurs at all levels and feedback is associated. It therefore asks Biosecurity Australia to consider preparing a document indicating action that it has taken in relation to the stakeholder consultation.

2.83 In evidence the Committee was informed by Australian Pork Ltd that it had sought to simulate Biosecurity Australia's work in establishing risks. It used the same software, and applied "exactly the same procedures as spelt out in the methodologies and developed in the issues paper, and identified in the draft IRA"⁹⁶. Australian Pork Ltd indicated that although most results were the same, there were some anomalies. Biosecurity Australia's workings were not available to Australian Pork Ltd.

2.84 The Committee notes that one of the key stones of Australia's IRA process is the transparency throughout the process. It therefore welcomes Biosecurity Australia's decision to make public its spreadsheets for other IRA reports.

92 Submission No 12, Australian Pork Ltd, p 19.

93 Submission No 12, Australian Pork Ltd, p 22.

94 *Committee Hansard*, 8 March 2004, p 16.

95 *Committee Hansard*, 8 March 2004, p 16.

96 *Committee Hansard*, 9 February 2004, p 24.

Conclusion

2.85 The Committee has examined the administration of Biosecurity Australia with particular reference to the Draft and Final Generic Import Risk Analysis for Pig Meat. In considering the Panel's work in risk assessments, the methodologies used and the conclusions and recommendations made for risk management strategies the Committee has been impressed at the exhaustive and thorough research that has been undertaken.

2.86 However, the Committee does have some concerns in relation to the methodology and therefore the assessments and risk management strategies proposed. These concerns have been outlined in this chapter. The Committee notes that these concerns have not been upheld by the Import Risk Analysis Appeals Panel (IRAAP). Further, the Director of Animal and Plant Quarantine has made a determination in relation to the importation of pig meat. The Committee notes that the Director chose to act without advising the Committee of his intentions. The Committee had its draft report under consideration.

2.87 The Committee remains concerned about the Panel's work on PMWS and the proposed risk management strategies. Discussion highlighted the suggestions by some evidence that article 5.7 of the SPS Agreement (the precautionary principle) should be applied. In this discussion the Committee noted the requirements placed on the use of the principle arising out of WTO appellate body decisions. It is of the view that evidence provided to the Committee relating to literature on the subject and current work on the disease questions the basis on which the Panel formed its decision.

2.88 Biosecurity Australia's reluctance to consider the use of article 5.7 of the SPS Agreement, given this evidence, reflects, in the Committee's view, the priority given to the "least trade restrictive" criteria over other criteria in an import risk analysis. This may reflect the influence of the "jurisprudence from SPS cases in the WTO" (paragraph 1.12). The Committee therefore makes the following recommendations:

Recommendation 1

The Committee recommends that the Director of Animal and Plant Quarantine withdraw the determination relating to quarantine regimes for the importation of pig meat.

And

Recommendation 2

The Committee recommends that Biosecurity Australia invoke article 5.7 of the SPS Agreement in relation to PMWS.

Senator the Hon Bill Heffernan

Chair

Appendix 1

List of all Committee reports on import risk assessments/analysis

1. Importation of Cooked Chicken Meat into Australia – Tabled October 1996
2. Interim report on the Australian Quarantine Inspection Service and the importation of salmon – Tabled 8 December 1999
3. An appropriate Level of Protection? The importation of Salmon Products: A case study of the Administration of Australian Quarantine and the impact of International Trade Agreements – Tabled 5 June 2000
4. The proposed importation of fresh apple fruit from New Zealand – Interim
Tabled 18 July 2001
5. The proposed importation of fresh apple fruit from New Zealand
Tabled 11 March 2004

Appendix 2

List of Submissions

1. PIC Australia
2. QAF Meat Industries Pty Ltd
3. David and Patricia Trewin
4. Biosecurity Australia
5. WT and GI Evans
6. Tarree Pastoral
7. AusPork Limited
8. Victorian Farmers Federation
9. The Australasian Meat Industry Employees' Union
10. P.A. Lewis
11. European Union
12. Australian Pork Limited
13. South Australian Farmers Federation
- 13A South Australian Farmers Federation
14. TG & FL Reed
15. McLean Farms
16. West Australian Pork Producers' Association
17. Mr Peter Gumbleton
18. NSW Farmers' Association
- 18A NSW Farmers' Association
19. Swickers
20. Agripork Australia Pty Ltd
21. DA Hall and Co
22. Cameron Pastoral Company
23. Professor Roger Morris
24. Queensland Pork Producers Inc
25. Mid West Piggery
26. Denni Piggery

Appendix 3

Witnesses who appeared before the Committee at the Public Hearings

Monday, 9 February 2004
Parliament House, Canberra

Department of Agriculture, Fisheries and Forestry

Mr Paul Morris, Executive Manager, Market Access and Biosecurity

Ms Mary Harwood, Executive Manager, Biosecurity Australia

Dr David Banks, General Manager, Animal Biosecurity, Biosecurity Australia

Dr Robyn Martin, Manager, Non Ruminants, Animal Biosecurity, Biosecurity Australia

Australian Pork Limited

Dr Paul Higgins, Chairman, Member and Delegate

Ms Kathleen Plowman, General Manager Policy

Dr William Hall, Research Manager, Research and Innovation Division

Mrs Mary Barnes, Consultant Statistician, Commonwealth Scientific and Industrial
Research Organisation Maths and Information Science

Mr David Pullar, Consultant on Risk Analysis and Import Risk, Commonwealth
Scientific and Industrial Research Organisation

Dr Eric Thornton, Veterinary Consultant

Monday, 8 March 2004
Parliament House, Canberra

Professor Roger Morris, Director, Massey University EpiCentre

Australian Pork Limited

Dr Paul Higgins, Chairman

Ms Kathleen Plowman, General Manager Policy

Dr William Hall, Research Manager, Research and Innovation Division

Mrs Mary Barnes, Consultant Statistician, Commonwealth Scientific and Industrial
Research Organisation Maths and Information Science

Mr David Pullar, Consultant

Dr Eric Thornton, Veterinary Consultant

Department of Agriculture, Fisheries and Forestry

Mr Paul Morris, Executive Manager, Market Access and Biosecurity

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