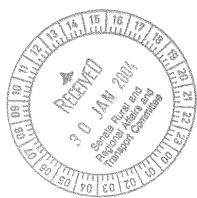




23 July 2003

Geoff Dawson Acting Secretary Senate Rural and Regional Affairs and Transport Committees SG 62 Parliament House Canberra ACT 2600



Dear Geoff

Senate Committee Inquiry Into Import Risk Analysis For Pig Meat

Thank you for the invitation to the Victorian Farmers Federation Pig Group (VFF Pig Group) to make a submission to the Senate Committee inquiring into Biosecurity Australia with particular reference to the Draft Import Risk Analysis (IRA) for pig meat.

The VFF Pig Group is a commodity group within the Victorian Farmers Federation the largest state farmer organisation in Australia representing 15,000 farming enterprises. The 77 pig farmers who are members of the VFF Pig Group represent approximately 70% of the Victorian pig herd.

The VFF Pig Group itself has had no direct involvement with either reviewing the draft IRA or compiling a submission. The complex nature of the 800 plus page IRA was well beyond the resources of the VFF Pig Group to engage the technical and scientific experts necessary to review the document in a methodical and objective manner.

Instead the VFF Pig Group has relied totally on Australian Pork Limited (APL) the national representative body for the Australian pig industry to review the IRA. APL put together a panel of experts to review the IRA and subsequently compile a measured objective submission. The same panel reviewed the other stakeholder submissions commenting on the Draft IRA and compiled a second submission in response to address particular issues raised in those stakeholder submissions and re-affirm positions stated by APL in their first submission.

The VFF Pig Group supports totally APL's position that it is imperative that the high health status currently enjoyed by the Australian pig herd must be safeguarded through strong science-based quarantine and biosecurity measures. The VFF Pig Group further asserts that Biosecurity Australia must strongly resist any propositions that may lead to the health status being jeopardised. Where there is any doubt a conservative approach is warranted.

While the VFF Pig Group itself has had no direct role in reviewing the Draft IRA, members of the VFF Pig Group did take the opportunity to attend the public meeting in Bendigo on September 29 2003 convened by Biosecurity to present the draft IRA and receive feedback.

One of the VFF Pig Group members who attended the Bendigo meeting informed me he attended on the understanding that the draft IRA recommendations for pig meat from PMWS affected countries clearly permitted only cooking offshore and the recommendations for pig meat from PRRS affected countries allowed cooking in Australia.

Dr Robyn Martin of Biosecurity Australia was questioned at the meeting on the difference in treatment between PRRS and PMWS. Dr Martin responded that the wording on the recommendations for PMWS was not to exclude cooking in Australia and in fact should have been written the same as for PRRS.

In light of Dr Martin's response one questions why was the draft IRA published if it contained such a critical error and also questions what influences were brought to bear to change the clear intent of the treatment of PMWS contained in the draft IRA to that stated at the Bendigo meeting.

Part of the rationale given by Dr. Martin for treating PMWS the same as PRRS was that the causative agent of PMWS was arguably known to be Circovirus type 2 and that because this organism is known to be present in up to 40% of Australian pigs the requirement for cooking offshore could not be substantiated. A similar argument put forward by overseas interests responding to the draft IRA.

Members of the VFF Pig Group have pointed out that they are aware of contrary views that argue the causative agent of PMWS is not known and that many respected virologists and pathologists support this position. Reference is made to a paper by Dr. John Deen DVN, MSC, PhD, Dipl ABVP in the October 2003 Volume 23 No. 8a International Pigletter in which Dr Deen states:

"The epidemology of the spread of disease (PMWS) clearly suggests an infectious agent. However, this infectious agent is not Circovirus. Circovirus already exist in the population that are being infected, so it is simply not the causative agent .Nor is it a controllable agent that we address in reducing the effects of this disease."

Dr Deen concludes:

"In a nutshell, my argument is that pathologists and virologists cannot define the disease at this time".

Dr Deen's position is clearly at odds with the position put by Dr Martin at the Bendigo meeting. Yes it is acknowledged Circovirus is present in the Australian pig herd but there have been no reported outbreaks of PMWS.

These contrary views highlight the fact the science with respect to PMWS is clearly not well understood and that is justification for taking a conservative approach and insisting on pig meat sourced from PMWS affected countries to be cooked offshore.

The VFF Pig Group will not take up the offer to give evidence before the Committee.

Brenan Wotherspoon

Yours Sincerely,

Executive Officer - Pig Group