EUROPEAN UNION

DELEGATION OF THE EUROPEAN COMMISSION TO AUSTRALIA AND NEW ZEALAND

Canberra, 4 February, 2003
JT/kg D (2003) 96
26.18.2/26.6.4

Mr Andrew Snedden
Committee Secretary,
The Senate Committee on Rural and Regional Affairs and Transport Legislation,
Parliament House
Canberra

Dear Mr Snedden.

The European Commission thanks the Senate Committee for the opportunity to comment on the draft Generic Import Risk Analysis for Pig Meat, published in August 2003.

The European Community has already commented in writing to the Australian Notification Authority in response to the notification of the text to the Sanitary and Phytosanitary Committee of the WTO, notice G/SPS/AUS/150. A copy of the EC comments is attached, as is a submission from the Danish Bacon and Meat Council on the specific issue of risk from Porcine Respiratory and Reproductive Syndrome (PRRS).

The European Commission is of the opinion that the Australian procedure for dealing with market access requests for animal and plant products is over-burdensome and lengthy, and notes that in many cases the process runs well outside the published timetables. This acts as serious deterrent to trade, and could be regarded in itself as a disguised restriction to trade. The European Commission urges the Australian government to allocate sufficient resources to allow applications to be dealt with in a more expeditious manner.

On more specific issues, the European Commission wishes to highlight that the assessment of risk in particular from Porcine Reproductive and Respiratory Syndrome (PRRS) and Post-weaning Multisystemic Wasting Syndrome (PMWS) would have the practical effect of prohibiting the import of fresh (including frozen) pig meat from all members of the European Union. This we consider to be over-protective and an unjustified barrier to trade which is not supported by a scientific risk assessment.

The assessment as presented in the draft IRA, 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 the qualitative categorisation are broad, and each translation from qualitative to quantitative risk and back multiplies this error. This could have been avoided by using the actual available data. For example, actual disease prevalence data is available, and it would be preferable to use this than to try to express it in a qualitative way. If this were to be done, the European Commission believes that a much lower risk estimate would be made. The methodology used in the IRA is not in line with international protocols for making a risk assessment. In particular, it leads to an inflated release risk estimate.

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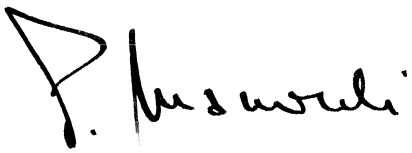
I confirm that the European Commission would be available to give further evidence should the Committee so request.

Yours sincerely



Piergiorgio Mazzocchi
Ambassador

Attachments