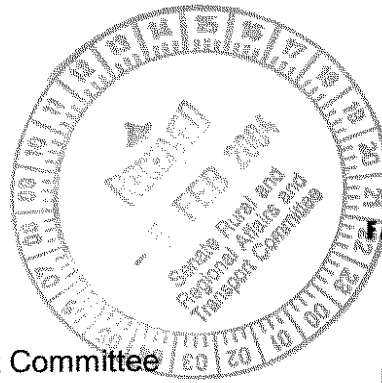


2 February 2004

Geoff Dawson, Acting Secretary
Senate Rural and Regional Affairs and Transport Committee
SG 62 Parliament House
CANBERRA 2600



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Dear Mr Dawson

Draft Import Risk Assessment for Pig Meat

The South Australian Farmers Federation (SAFF) Commercial Pork Section Committee welcomes the Rural and Regional Affairs and Transport Committee's (RRAT) inquiry into the Draft Import Risk (RA) assessment for Pig Meat, particularly the concerns raised regarding Post Weaning Multisystemic Wasting Syndrome (PMWS).

We wish to alert the RRAT Committee of our view that the draft IRA report and proposed import protocols do not adequately address the significant disease risks inherent in importing pig meat from PMWS and Porcine Reproductive and Respiratory Syndrome (PRRS) affected countries.

Key amongst our concerns is the fact there is no known cure for pigs affected by PMWS and there are also no vaccines available. In addition there is limited scientific knowledge as to its causes or how it is transmitted. This has been highlighted by the recent first time outbreak of this disease in New Zealand. NZ authorities do not know how it got there and admit that it cannot be eradicated. Instead, NZ has moved to contain the disease in the hope of slowing its spread.

Without a clear understanding of the factors associated with this disease, control measures are also difficult to implement. Consequently, there is little that can be done to reduce the cost of an outbreak.

We believe that until the additional causative factors are identified for PMWS, and in turn measures developed as to how to control it, BA would be justified in accordance with the Precautionary principle of the SPS Agreement (Article 5.7), in not allowing the importation of pork from PMWS affected countries while it conducted additional research regarding the aetiology of PMWS and the virulence of different strains of PCV2.

SAFF Commercial Pork also has significant concerns that within the draft IRA the risk management procedures proposed for the diseases PMWS & PRRS do not adequately reduce the risk posed. We believe insufficient comparative risk analysis or explanation as to why on-shore processing is considered as safe as offshore. In particular Biosecurity Australia's (BA) advice in relation to whether risk management measures proposed for the processing of pig meat (cooking or curing) from PMWS affected countries can be undertaken both onshore and offshore appears to contradict the Draft IRA which refers to offshore processing only.

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An out break of PMWS within Australia's borders would seriously damage Australian pork industry with the cost of an epidemic being estimated to result in 15% increase in the cost of production. The Australian pork industry is struggling against the appreciating value of the dollar, rising costs and the impact of imports. In light of these factors an outbreak of PMWS would be devastating.

The pork industry generates substantial income and employment in rural and regional Australia. The industry generates over \$1.1billion in household income and employs more than 33,000 people across Australia through the pork value chain. In recent years Australia's pork sector has evidenced one of the fastest rates of export growth for any agricultural industry.

Another major concern of SAFF Commercial Pork is the potential loss of Australia's unique health status – our one clear competitive advantage in international markets over most pork producing countries. In recent years the Australian pork industry has been one of the run-away export success stories with annual export markets now valued at over \$228 million per year as compared to only \$24 million in 1997. Given the high level of importance our key export markets of Japan and Singapore place on health status and food safety, an outbreak of PMWS or PRRS could severely jeopardise our recent international success.

SAFF Commercial Pork also wish to express concern regarding a number methodological issues identified by Australian Pork Limited. These concerns include:

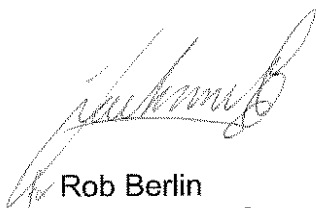
- the questionable quantitative approach applied to consequence assessment and risk estimation;
- The apparent underestimation of the total impact of diseases due to the annualised calculation used to asses the likelihood of entry and exposure;
- Underestimation of the volume and market penetration used in simulations and that this in turn impacts on the overall annual risk and also the inappropriate use of the 50th percentile instead of the 95th percentile;
- The rules for the Impact Score Tables appear arbitrary and it is therefore not possible to reach the outcomes identified in the Draft Report.

SAFF Commercial Pork is also concerned that the draft IRA also fails to document the appraisal techniques intended to be used to ensure proper execution of risk management procedures.

Given the potentially devastating impact an outbreak of PMWS and/or PRRS could have on the Australian pork industry it is clear to SAFF Commercial Pork that every precaution must be taken to ensure these diseases do not enter Australia.

SAFF Commercial Pork does not believe the measures proposed by Biosecurity Australia are adequate and fail to reduce the risks to meet Australia's appropriate level of protection.

Yours sincerely



Rob Berlin
Chairman – Commercial Pork Committee
South Australian Farmers Federation