

## **APPENDIX 4**

**Letter from the Hon. Simon Crean MP, Minister for Trade to the Hon. John Cobb, Shadow Minister for Agriculture, Fisheries & Forestry, dated 25 February 2010.**



**THE HON SIMON CREAN MP**  
**Minister for Trade**

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25 FEB 2010

The Hon John Cobb  
Shadow Minister for Agriculture, Fisheries and Forestry  
Suite RG 57  
Parliament House  
CANBERRA

  
Dear Mr Cobb

Thanks for taking the time to meet with me yesterday to discuss the policy change for the importation of beef and beef products.

As discussed, the Government is confident that this new policy satisfactorily meets Australia's human and animal health requirements.

Please find following the additional information you requested. I am hopeful that this information will help clarify the issues relating to traceability, IRAs and the protocols for Coalition members.

Please contact me if you require any additional information.

Kind Regards,

  
**SIMON CREAN**

**1. Question: We have a world class NLIS. Will we be requiring equivalent traceability and use just as rigorous tests?**

**Answer: Yes. We will demand the same traceability standards of foreign beef producers as we demand of Australian beef producers. See below**

Australian producer requirements	Importer requirements
<b>1. Trace animal to origin/birth</b>	<p><b>Same</b></p> <p><b>Alternatives accepted: No</b></p>
<b>2. Trace animal forwards (ie destinations after production)</b>	<p><b>Same</b></p> <p><b>Alternatives accepted: No</b></p>
<b>3. Complete 1 and 2 within 48 hours</b>	<p><b>Same</b></p> <p><b>Alternatives accepted: No</b>  <i>(Note: although explicit in the protocol, this will be deemed a requirement by FSANZ)</i></p>
<b>4. Electronic ear tags</b>	<p><b>Same</b></p> <p><b>Alternative method accepted: Yes - (i) plastic ear tags or (ii) equivalent output, but only where Australia has verified that the alternative method ensures animals can be traced up and down the food chain within the specified timeframe (ie 48 hrs)</b></p>
<b>5. National vendor declaration</b>	<p><b>Same</b></p> <p><b>Alternatives method accepted: Yes, equivalent method, but only where Australia has verified that the alternative method ensures the same outcome ie proper records/attestations about on-farm risk management measures</b></p>
<b>6. Livestock production assurance</b>	<p><b>Same</b></p> <p><b>Alternative method accepted: Yes, equivalent method, but only where Australia has verified that the alternative methods ensures the same outcome ie on-farm risks are managed (eg chemical treatments, no use of bone meal, veterinary drug use etc)</b></p>

## 2. Why no IRA –is assessment as good as analysis?

### Answer:

1. Australia has long imported beef. We have assessed all the diseases that can be carried by beef and have developed the best systems for ensuring these diseases don't enter – eg for FMD, rinderpest
2. We are doing exactly the same for BSE. We have the knowledge about the disease, we know how it's transmitted, we know how to managed the risks. Most importantly we know how to prevent entry of the disease into the human and animal health populations
3. In addition to the protocols (developed by FSANZ to deal with the food safety issue), we are also undertaking a quarantine risk assessment for each country wanting to export beef to Australia. This assesses each country on a case-by-case basis and will ensure our animal quarantine requirements are met. This risk process includes a public consultation.
4. So not only will countries wishing to export their fresh beef to Australia have to pass a rigorous assessment regarding their BSE risk, they will also need to abide by stringent import conditions for other animal health diseases
5. In summary: We are adapting the rigour of our current quarantine regime to those wanting to export to Australia. In these circumstances risk assessment and targeted science are the best response to manage any animal quarantine risk - not an IRA that tells us what we know.

Note: Import Risk Analyses are appropriate in specific circumstances, as follows:

IRA Criteria	Relevant here?
Relevant risk management measures have not been established	<p><b>No</b></p> <ul style="list-style-type: none"> <li>- we already have import conditions for beef imports</li> <li>- Protocols address BSE.</li> <li>- Risk assessments address other disease risk (eg FMD, rinderpest)</li> </ul>
Needed to asses the likelihood of spread of diseases	<p><b>No</b></p> <ul style="list-style-type: none"> <li>- Minute risk</li> <li>- BSE is not a contagious disease. It is spread only through cattle eating contaminated meat products. And since 1997 Australian has banned feeding meat products to cattle.</li> </ul>
Needed to assess the level of probability of entry	<p><b>No</b></p> <ul style="list-style-type: none"> <li>- Overall risk is profoundly low. As quantified in the Mathews' report (0.002% over the next 50 years)</li> <li>- Human Health – FSANZ has said consumers can be 100% certain that all imported beef would be BSE free</li> <li>- Animal Health – finding that no viable pathway for transmission of BSE to Australian cattle. (ie no live imports and no bone meal feed). A review of existing policy will address any animal quarantine risk</li> </ul>



Needed to assess the probable extent of the harm	<p><b>No</b></p> <p>Fully analysed. Minute risk (see above) plus timely traceability</p>
Needed to identify pest/disease carried by beef	<p><b>Yes</b></p> <p>But BSE addressed by human health protocols/assessment. Any other animal disease risk (eg FMD) dealt with through the assessment process.</p>

**3. Question: Please explain the protocols – how do they fit with the overall system?**

**Answer:**

<b>Steps</b>	<b>Requirements</b>
<b>Step 1</b>	<b>Country applies to the Australian BSE Food Safety Assessment Committee (chaired by FSANZ – includes DAFF representative)</b>
<b>Step 2</b>	<b>Country separately applies to DAFF to have Biosecurity Australia assess their animal quarantine risks – this is a separate process applying to fresh and frozen product</b>
<b>Step 3</b>	<p><b>FSANZ assesses the risk category for <u>BSE</u></b></p> <p><u>Risk Category:</u></p> <ul style="list-style-type: none"> <li>• Category 1 – negligible risk that there could be BSE in their cattle</li> <li>• Category 2 – previous BSE outbreak or risk of an outbreak, but verified risk mitigation</li> <li>• Category 3 – not an acceptable exporter to Australia</li> </ul> <p><u>Criteria for judging risk category</u></p> <ul style="list-style-type: none"> <li>(i) Assess completed <b><u>protocol questionnaire</u></b></li> <li>(ii) If previous BSE outbreak, <b>in-country assessment</b> including on traceability, identification, diagnostic capability, slaughter and processing etc</li> <li>(iii) If previous BSE outbreak, ensure <b>verifiable system to prevent export of risk material</b> (eg brain, spinal cord etc)</li> <li>(iv) If previous BSE outbreak, ensure <b>verifiable system of no cross contamination from risk material</b></li> <li>(v) <b>If any criteria not met then category 3 (no imports)</b></li> </ul>
<b>Step 3</b>	<p>If category 1 or 2 on BSE, then <b>Biosecurity Australia/AQIS begins 8 steps to assess overall quarantine risks:</b></p> <ul style="list-style-type: none"> <li>(i) <b>Assess animal health status</b> in the exporting country</li> <li>(ii) <b>Draft quarantine requirements</b></li> <li>(iii) Further <b>in-country assessment</b> may be required</li> <li>(iv) <b>Draft quarantine requirements on website</b></li> <li>(v) <b>Stakeholder comments</b> considered (public, industry etc)</li> <li>(vi) <b>Recommendation for a policy determination on quarantine requirements</b> – eg on FMD, Rinderpest</li> <li>(vii) <b>Determination provided to AQIS</b> for applications for beef products</li> </ul>

	<b>(viii) AQIS implements certifications</b>
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