

Submission on the Policy for the importation of live infectious agents into Australia

10 February 2023

Animal Biosecurity Branch
Department of Agriculture, Fisheries and Forestry
GPO Box 858
Canberra
ACT 2601

Via email only: animalbiosecurity@agriculture.gov.au

Re: Animal Biosecurity Advice 2022-A10: Policy for the importation of live infectious agents into Australia

To whom it may concern,

WoolProducers Australia (WoolProducers) welcomes the opportunity to provide feedback on the revised policy for the importation of live infectious agents into Australia.

WoolProducers is the peak industry body representing Australian wool growers across a vast range of issues, including animal health and welfare, biosecurity, natural resource management, emergency animal disease outbreak preparedness, and industry development - including research and trade.

WoolProducers has a strong commitment to biosecurity, particularly through our role as the wool industry signatory to the Emergency Animal Disease Response Agreement (EADRA). In addition to this role WoolProducers engage in cross-sector biosecurity related initiatives through our membership of organisations such as Animal Health Australia and the Centre for Invasive Species Solutions.

WoolProducers response to the revised policy is outlined below:

WoolProducers understand the need to import live infectious agents into Australia, including exotic diseases of national significance, such as those listed in the EADRA. The importation of such agents allows Australia to more readily respond to an emergency animal disease (EAD) incursion through enabling the following (non-exhaustive list) activities to be undertaken domestically:

- Diagnostic testing activities
- Vaccine development and vaccine matching
- Assessing Australian native species for susceptibility to exotic pathogens (and therefore their role in transmission) Previous government policy has enforced the complete prohibition of the importation of certain live infectious agents such as Foot and Mouth Disease Virus (FMDV), as the only method in which an Appropriate Level of Protection (ALOP)¹ can be achieved. The recent COVID-19 pandemic demonstrated the importance of sovereign diagnostic testing and vaccine development and validation capability. Combined with the spread of FMD to Indonesia and the resultant increased risk of an incursion to Australia renders the past policy of total prohibition of such disease causing agents inadequate.

¹ As defined in the Biosecurity Act 2015 and preceding legislative instruments

In fact, retaining or enforcing a complete prohibition on the importation of such agents may actually impede the ability for the Australian biosecurity system to respond to an EAD incursion, therefore indirectly lowering the “ALOP” at a system level, without any importation of the disease causing agent having taken place.

Appreciating the concept of ALOP, and that biosecurity risk can never be (practically) managed to a zero level, WoolProducers wishes to emphasise our support for the following critical elements of the revised policy:

- The department shall consult with the AHC and relevant industries on a permit-by-permit basis.
- That importation of such exotic animal pathogens or pests is limited to ACDP at this point in time (future facilities may be subject to consultation with the AHC and industry under the permit-by-permit consultation basis).
- That a robust audit and verification system remain in place involving the departmental and external audits to verify ongoing compliance with import permit conditions.
- That the frequency of the above audits is increased during times that ACDP is holding significant or emerging exotic animal pathogens or pests.
- That any imported significant, or emerging exotic animal pathogens or pests (or their derivatives) are destroyed upon the expiration of an import permit (or where there is an absence of a valid import permit).

Taking into consideration the above points, WoolProducers requests that the policy be amended to include a requirement that the only permissible purpose for importation of such agents is to improve the capacity of the Australian biosecurity system to respond to an EAD (including, but not limited to those diseases listed in EADRA). Without a demonstrable improvement to Australia’s ability to respond to an EAD incursion, WoolProducers does not believe that ALOP can be achieved when importing infectious animal disease causing agents (such as those listed in EADRA) as a commodity.

We appreciate the opportunity to comment on the revised policy and would welcome Departmental staff to contact me should there be specific points that require further discussion. We look forward to advice in relation to your consideration of permissible purposes for the importation of live infectious agents.

Yours Sincerely,



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