The Australian Veterinary Association

Submission to the Senate Standing Committee on Rural and Regional Affairs and Transport

Beef Imports into Australia

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Introduction

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. Its 6500 members come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, including cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.

We welcome the opportunity to comment on Beef Imports to Australia on behalf of AVA members.

Executive Summary

The AVA is deeply interested in beef import policy. We are consulted on such policy and frequently advise DAFF on experts who may be included in expert panels.

International trade in beef has historically been the cause of transmission of disease, including foot and mouth disease (FMD) and bovine spongiform encephalopathy (BSE).

The Department of Agriculture, Fisheries and Forestry (DAFF) and Food Standards Australia and New Zealand (FSANZ) import requirements are appropriately based on the World Organisation for Animal Health (OIE) *Terrestrial Animal Health Code* and the World Health Organisation (WHO) and Food and Agriculture Organisation (FAO) joint *Codex Alimentarius*.

The AVA believes that the OIE *Terrestrial Animal Health Code* requirements for BSE address the known science with the possible exception of bovine semen and embryos. The AVA believes that the OIE codes and Australia's import requirements should be reviewed in the light of the latest science.

It must be said however that Australia pursues conservative import policies and the AVA recommends that this continue.

The AVA also believes that consumers should be informed as to the country of origin through labelling to the point of sale, not just that product is reassembled in Australia (without revealing the source of ingredients).

DAFF should ensure that countries from which we import beef have effective trace back systems. The Australian National Livestock Identification Scheme (NLIS) is the envy of the world. Trace back is crucial in disease control, food safety and export certification.

The AVA strongly supports the use of the OIE Performance of Veterinary Services (PVS) tool to maintain confidence in overseas veterinary certification and disease free status, or in countries with disease free zones, that the proper maintenance and surveillance of compartments and zones is audited and monitored.

The BSE agent is not usually inactivated by the heat of manufacture of canned and other processed products. This must be taken into account in import risk analyses.

Beef Imports into Australia

Terms of Reference

(a) the possible imminent importation of beef products from countries whose cattle herds have bovine spongiform encephalopathy (BSE) and/or foot-and-mouth disease (FMD);

Imports of beef carry some risk of importation of BSE and FMD and other exotic and endemic diseases. The risk and consequences are the bases of Import Risk Analyses (IRA) undertaken before imports are approved. The AVA is aware that IRAs for beef from USA, Japan and the Republic of Korea were in progress but were halted because some essential information was not available (USA) or outbreaks of disease (Japan and Korea)

The Department of Agriculture, Fisheries and Forestry (DAFF) and Food Standards Australia and New Zealand (FSANZ) import requirements are based on those of the World Organisation for Animal Health (OIE) *Terrestrial Animal Health Code* and the *Codex Alimentarius*.

The OIE Code and Codex Alimentarius are called up by the WTO through the WTO *Sanitary and Phytosanitary Agreement* as the international quarantine requirements for international trade in animals and animal products.
The AVA believes that the OIE *Code* requirements for BSE address the known science in relation to BSE. The one possible exception relates to bovine semen and embryos. The AVA would like Australia to review this and seek to have the OIE review its own codes..

The science relating to FMD is well established and incorporated in the OIE Code. Codex is not relevant because FMD is not a zoonosis. Australia is currently reviewing the place of FMD vaccination, which is included in the OIE Code, in its AUSVETPLAN for the handling of outbreaks.

Review of IRAs by the Eminent Scientists Group is an important part of public and stakeholder reassurance.

It is timely given current consideration by Parliament of the Biosecurity Bills that the IRA process be reviewed. Other risk analysis techniques might be included.

Health standards of imported products must be the equal of Australian products. This should be the objective of Imported Food Inspection. Laboratory testing must be included.

Australia's conservative approach to beef import policy has been very successful in excluding FMD and BSE and must be continued.

(b) the processes undertaken by Australian government agencies in determining risk to consumers and industry and the adequacy of such processes;

Draft import policies are published for consultation by DAFF. The AVA is consulted by DAFF during IRAs and sometimes advises on suitable experts for inclusion in Risk Analysis Panels.

The AVA is aware that DAFF employs a step risk approach to IRAs. This can be qualitative or semi-quantitative and investigates the series of activities involved in importation of an animal, genetic material or an animal product and the risks involved and means of mitigating them, at each step. Where data are available a quantitative or semi-quantitative approach is taken. This was employed, for example, in the IRA for imports of pig meat. We are aware that, following arguments and legal action in that case, qualitative methods are more commonly used.

Stochastic semi-quantitative approaches sometimes utilise Monte Carlo / random number simulations and associated sensitivity analyses. Where there are few data Delphi techniques may be employed.

As there is great debate over IRAs within Australia among stakeholders and as outcomes may have to be defended in WTO Dispute Settlement Panels the approach taken is of great importance and of itself needs to be transparent and defensible. Review of the science by the Eminent Scientists Group is an important part of public and stakeholder reassurance. The AVA notes that these matters are being addressed in the Biosecurity Bills currently before Parliament.

There are many approaches to risk analysis. The DAFF approach has been designed to ensure that Australia meets its obligations under the WTO, OIE, Codex Alimentarius and the International Plant Protection Convention. It also reflects the Standards Australia approach.

The AVA is aware that samples of beef imported from Brazil for testing for inclusion in canning in Australia created great concern in the Australian community and in the Parliament, when empty blood stained cartons were found on the Wagga Wagga tip and access by feral pigs was conceivable.

It is our understanding that the Brazilian samples were approved by AQIS / Biosecurity Australia because the region of production within Brazil was declared as an FMD free zone with vaccination by the OIE and they were going to a particular establishment. This would seem to be acceptable. The underpinning issues of concern were that the FMD free region of Brazil has broken down on occasion. It seems that the capacity of the country's veterinary services and laws for movement controls and disease control and inspection and certification of meat had not been examined by Australian authoritiesand subjected to risk analysis. This is provided for in the OIE requirements indeed the OIE PVS Pathway (a means of assessing the performance of veterinary services) is provided by OIE. This incident demonstrated the importance of a visit by an Australian team to the country of origin and completion of a full risk analysis before importation is approved. This is DAFF practice but it needs to be confirmed because the cost of such visits to the government and industry is considerable. Some other countries undertake such visits.

The Australian National Livestock Identification Scheme (NLIS) is the envy of the world. This is crucial in disease control, food safety and export certification. DAFF should ensure that countries from which we import beef have effective trace back systems.

It is timely given current consideration of the Biosecurity Bills that the IRA process be reviewed. There might be other risk analysis techniques that can be employed.

(c) the lessons to be learnt from the recent contamination of the beef supply chain with horse meat throughout Europe and its implications for Australian consumers and industry;

Australia includes checks as to the species from which meat products are derived in its own meat production. Such testing should be an essential element of Imported Food Inspection. An equally important matter is assurance of the community that health standards of imported products are the same as those of Australian products. This should be the objective of Imported Food Inspection. Laboratory testing must be included as is done in Australia.

(d) the likely implications of allowing imports of beef from BSE and FMD countries on Australia's international reputation and standing as the world's safest exporter of beef;

Importation of beef from BSE and FMD affected countries would affect Australia's standing as a safe exporter because it places our disease status at risk. The effect would be minimal if importation were to be in line with the OIE Terrestrial Animal Health Code. Importation policies form part of the import risk analysis process of importing countries as mandated by the OIE. Australia's conservative approach has been very successful in this and should in no way be diluted.

(e) the adequacy of Australian food labelling laws to ensure Australian consumers can make a fully informed choice on Australian meat products;

Consumers may wish to choose meat products of Australian origin. The AVA understands that Australian food labelling laws comply with Codex Alimentarius but we have not studied them in regard to their capacity to inform consumers as to the origin of meats. Overseas beef may present BSE risk. This would be low if the specified risk materials (particular tissues) were removed before import into Australia.

Pork and pork products, which are susceptible to FMD but not BSE, are imported and some Australian products are labelled "made from Australian and imported ingredients". Further detail is difficult for the consumer to get.

BSE is particularly important because the agent is not usually inactivated by the heat of manufacture of canned and other processed products.

It must be said that however that Australia pursues conservative import policies and the AVA recommends that this continue.

The AVA also believes that clear country of origin labelling to the point of sale should be mandatory so that consumers can make informed judgements.