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26 August 2022

Mr Gerry McInally
Committee Secretary
Senate Standing Committee on Rural and Regional Affairs and Transport
PO Box 6100
Parliament House
Canberra

Submission via Online Submission System at https://www.aph.gov.au

Dear Mr McInally,

Re: Inquiry into the adequacy of Australia's biosecurity measures and response preparedness.

Thank you for the opportunity to provide a submission to the Rural and Regional Affairs and Transport References Senate Committee inquiry on the adequacy of Australia's biosecurity measures and response preparedness, in particular with respect to foot-and-mouth disease.

Biosecurity is Australia's primary line of defence against concurrent and significant animal health threats at present – including Foot-and-Mouth Disease (FMD), Lumpy Skin Disease, African Swine Fever, Japanese Encephalitis and varroa mites. Australia's previous experiences with detecting and controlling serious animal diseases such as equine influenza and avian influenza, clearly demonstrate the devastating consequences of animal disease incursions on our agricultural sector, local communities, food supplies, sport and recreation, the national economy and global trade networks.

The direct and indirect costs of an emergency animal disease response escalate dramatically once a disease is detected. The priority must always be to keep exotic animal diseases *out* of Australia, rather than trying to control or eliminate a disease post-incursion.

AMA believes it is somewhat premature to draw conclusions on the current biosecurity response to FMD and other animal diseases, given that the situation is still highly dynamic and the threat of incursion is still very real.

The coordinated and collaborative efforts of many key stakeholders, including Animal Health Australia, National Farmers Federation, Red Meat Advisory Council, Meat and Livestock Australia, Australian Veterinary Association, Department of Agriculture Fisheries and Forestry, the Office of the Chief Veterinary Officer and various state government departments and agencies, has been invaluable to provide clear advice to government and producers in the face of multiple animal disease threats in the last 12 months.

This response has successfully kept FMD out of Australia to date. Detections of viral fragments of FMD in imported goods and travellers' belongings is a positive indication that the defences are working, but they are no guarantee and Australia cannot afford to become complacent or be tempted to weaken these responses prematurely.

AMA is pleased to offer the following comments to the Inquiry Committee and looks forward to ongoing engagement on this important topic.

Yours sincerely,

Ben Stapley

Executive Director
(unsigned for electronic submission)

SUBMISSION TO THE

RRAT inquiry into the adequacy of Australia's biosecurity measures and response preparedness

26 August 2022

Animal Medicines Australia

Introduction

Animal Medicines Australia (AMA) is the peak industry association representing the registrants and approval holders of veterinary medicines and animal health products in Australia. They include local companies and the local divisions of global innovators, manufacturers, formulators and registrants that manufacture and supply essential veterinary medicines and animal health products that are critical to supporting Australia's $34 billion livestock industry and the $30 billion industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

AMA member companies play a vital role in Australia's biosecurity as the producers of medicines that prevent, control and treat animal diseases across the livestock, equine and companion animal sectors. AMA members develop, register and supply innovative new animal health products including vaccines and medicines to prevent and control outbreaks of animal disease, as well as those that enable good health and wellbeing. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare.

AMA members provide medicines to address endemic disease threats (for example, Johne's Disease, Newcastle Disease and Hendra virus), and lead the response to emerging and exotic disease threats (such as the 2007/8 outbreak of equine influenza). AMA members also produce disinfectants and other anti-infective products used for everyday hygiene and sanitation in animal environments, including quarantine facilities, veterinary clinics and hospitals, farms, boarding facilities, racing stables, grooming salons and in the home.

Australia's disease-free status for many debilitating animal diseases is rare and confers significant benefits to the reputation of Australia's agricultural industries. It delivers important market advantage for our producers through competitive costs of production, the production of high-quality goods and industry sustainability. An outbreak of animal disease could have severe ramifications for the entire agricultural sector, as well as domestic animal health, food safety, public health and the environment.

AMA considers it essential that:

- Biosecurity activities are underpinned by science and risk assessment;
- Response and control measures are proportionate to the risk posed by an activity or disease;
- State and territory-level biosecurity activities and strategies are aligned with national activities and strategies, whilst allowing unique or location-specific risks to be appropriately addressed; and
- The biosecurity system considers both current and future biosecurity threats, and has the agility to respond to sudden shocks (such as disease incursions or disruptions to supply chains for important animal medicines).

The impact of animal diseases in Australia

Outbreaks of animal diseases can have catastrophic and far-reaching impacts on animal welfare, agricultural industries and our everyday lives. Strong biosecurity is invaluable to mitigate the significant costs of responding to and controlling a preventable disease outbreak.

For example:

- A 1999 outbreak of Newcastle Disease in Australia resulted in the slaughter of 1.9 million meat chickens and 13,000 laying hens, with a cost to farmers of around $200 million. The eradication program took 3 months, involved 5000 people and cost the government $22

million excluding compensation.[1] There have been no outbreaks of Newcastle Disease in Australia since a vaccination and surveillance program was implemented in 2002.[2]

- The 2007-08 outbreak of equine influenza (EI) caused unprecedented economic loss and disruption to Australia's equine industries in New South Wales and Queensland, with the direct costs of the emergency response conservatively estimated to be in excess of $360 million.[3] This estimate did not include the indirect economic, social and emotional costs to horse owners associated with the death or illness of their horses, disruption to business and recreational activities, strict movement restrictions and other biosecurity measures, and participation in disease tracing and surveillance activities. Restrictions on the movement of horses persisted for more than 6 months, causing significant economic and social disruption for professional and recreational equestrian sports, horse racing and veterinary professions in both infected and uninfected regions, with the secondment of key staff to the infected areas and increased state border controls across the country to prevent disease spread.

- in 2020 and early 2021, there were simultaneous outbreaks of three different strains of avian influenza (AI) across 6 Victorian poultry farms, thought to have been carried by wild birds. AI is a highly contagious viral infection and can cause severe symptoms and sudden death in domestic poultry (up to 100% of affected birds). Responding to outbreaks of AI generally includes slaughter-out of infected and in-contact poultry, decontamination, strict quarantine, movement controls, and tracing and surveillance of the infection. About 500,000 birds were culled during this outbreak, resulting in multi-million dollar losses for individual farms and widespread impacts on the poultry meat and egg industries.

The agricultural sector is a multi-billion-dollar industry that is critical to Australia's economy. If Foot and Mouth Disease (FMD) occurred in Australia, it would be devastating for the meat and wool industries, halting exports for at least six to 12 months and estimated to cost the industry up to $80 billion over ten years.[4] This would have significant impacts on both food availability and cost for domestic consumers as well as trade partners.

Biosecurity must include effective surveillance of animal disease within Australian borders. This will enable responsible authorities and affected stakeholders to detect and track endemic, exotic and emerging diseases that threaten animal health. Wild animals can be important disease reservoirs and vectors and it is important to include surveillance of wild animal populations as well as domestic animals. For example, migratory water birds can carry various strains of avian influenza, fruit bats are known vectors for Hendra virus, and wild pigs could become a reservoir for African swine fever if it enters Australia.

The importance of animal medicines to biosecurity

Animal disease incursions pose serious risks to animal health and welfare, productivity and sustainability. The World Organisation for Animal Health (WOAH) estimates that more than 20% of animal production worldwide is lost as a direct result of disease.[5]

[1] Chicken kill leaves bitter aftertaste (smh.com.au)
[2] Newcastle Disease Management - Animal Health Australia
[3] Overview of the industry and social impacts of the 2007 Australian equine influenza outbreak - Hoare - 2011 - Australian Veterinary Journal - Wiley Online Library
[4] FMD/LSD impacts on the Australian red meat industry – your questions answered | Meat & Livestock Australia (mla.com.au)
[5] ANIMAL-HEALTH-EN-FINAL.pdf (woah.org)

Without access to animal health products such as vaccines, antimicrobials and parasiticides, farm productivity would be reduced due to:

- higher farm input costs per unit of production, which are often passed on to consumers;
- sick animals being less productive, thus reducing returns on farm investment;
- higher animal mortality due to illness or disease, leading to falling stock numbers and the loss of valuable genetic lines; and
- more labour-intensive stock management practices to control and manage disease on farm.

Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare. Maintaining the health and welfare of Australia's livestock is essential to realise the National Farmers Federation's ambitious goal of Australian agriculture being a $100 billion sector by 2030.[6]

AMA member companies produce the veterinary products needed to effectively prevent, treat and control exotic animal diseases such as FMD and varroa mite. Biosecurity preparedness must include access and supply plans for a range of veterinary medicines that may be required, including medicines that may not be routinely held in Australia and those that are not currently registered for use here.

In disease outbreak situations, time is critical. It is vital that our biosecurity systems have the capability and flexibility to respond quickly. This includes streamlining the process for emergency approvals and permits, fast-track systems to clear imported medicines or ingredients for local manufacturers quickly through Australian borders, and risk-based flexibility in satisfying non-critical regulatory requirements.

For example, if an exotic animal disease (such as FMD or Lumpy Skin Disease) was detected in Australia, the emergency disease response plan is likely to rely heavily on access to and use of effective veterinary medicines. At a minimum, an Item 22 application for an emergency use permit to legalise use of an Agvet chemical product or active constituent for a new condition or disease must be granted by the APVMA. Veterinary medicines or active constituents that are imported for use under an emergency permit also require a separate consent to import from the Department of Agriculture, Fisheries and Forestry (DAFF). Separate permissions may also be required from individual states and territories to allow the legal use of that product or active constituent in that jurisdiction. The administrative processes to obtain the required permits and permissions to use an animal medicine in an emergency situation must be flexible and efficient to support a timely and effective response.

Regulatory settings are an important component of biosecurity. The ability of animal health companies to maintain business continuity and the capacity to develop and provide critically important veterinary medicines depends on a regulatory environment that is reliable, efficient and predictable. Disruptions related to the COVID-19 pandemic illustrate the need for flexibility and adaptability in the biosecurity system to mitigate the impacts when 'business as usual' is not possible.

Biosecurity and Trade

Australia is in a unique position because many of the world's most devastating and debilitating animal diseases are not present here. Our strict biosecurity measures and systems are critical to maintain this disease-free status, which is an essential component of our valuable agricultural and trade industries and supports our international reputation as a trusted producer of safe, high quality food and fibre.

Biosecurity practices complement good animal husbandry and welfare to protect animal health. Healthy animals support a reliable, productive and sustainable agricultural industry, and provide important trade advantages for Australian producers in the global marketplace. An outbreak of animal

[6] 2030 Roadmap - National Farmers' Federation (nff.org.au)

disease could have severe ramifications for the entire agricultural sector, as well as domestic animal health, food safety, public health and our environment.

Biosecurity responses

Australia's biosecurity is heavily dependent on the interconnectedness of many different systems in multiple locations, both within and outside our national borders. A system is only as strong as its weakest link – a failure in one part of the biosecurity system could potentially place the entire system at risk and have far-reaching impacts. It is therefore essential that actions to support and improve effective and efficient communication, partnership, knowledge sharing and stakeholder engagement across all levels of the biosecurity system are prioritised.

Biosecurity must embed communication at the heart of all activities. Efficient and effective communication, collaboration and cooperation between local, regional, state/territory, national and international stakeholders is of paramount importance to ensure biosecurity and regulatory responses are timely, feasible, practical and able to deliver the desired outcomes.

Effective biosecurity depends on the integration of activities across national, regional, local and individual scales, and encompasses multiple potential entry pathways of pathogens into and within Australia. Effective and efficient communication, collaboration and cooperation between stakeholders at all levels is critical to ensure risks are clearly identified and communicated to affected parties.

At present, state and territory governments bear a lot of responsibilities for implementing national biosecurity measures. They need to be adequately and sustainably funded to do so – weak links put the entire system at risk. It is also important to seek harmonisation and alignment of state/territory biosecurity arrangements wherever possible and appropriate, to improve understanding and consistent application. However, AMA also acknowledges the need for a degree of flexibility and variation in the system to address specific local and regional-scale biosecurity issues.

Individual actions are an essential component of 'on the ground' activities that support everyday management of biosecurity risks. Engagement and understanding by individuals also facilitate surveillance, compliance, and other practical biosecurity measures that may be required. Farmers and veterinarians are often the first to notice unusual disease activity. It is critical that they are well informed about biosecurity risks and their roles and responsibilities in the event of a disease incursion, such as notifying authorities, isolating affected animals and implementing strict biosecurity protocols for entering/leaving properties.

Biosecurity is supported by active engagement with key industry associations and organisations such as Animal Health Australia, the National Farmers Federation, Meat and Livestock Australia and the Australian Veterinary Association. These organisations are key conduits for the coordinated dissemination of trusted advice to the industries that are directly affected. Local authorities and communities are also valuable sources of local knowledge and understanding on potential risks in a particular area, including local patterns of disease and distribution of insect species.

The importance of comprehensive and detailed emergency response plans for animal disease incursions has been highlighted by recent events. AUSVETPLAN[7], administered by Animal Health Australia, contains the nationally-agreed approach for the response to emergency animal disease (EAD) incidents in Australia. Specific responses have been developed for a number of high priority EADs that pose current threats to Australia, including FMD, African Swine Fever, Lumpy Skin Disease

[7] Informing EAD Responses - AUSVETPLAN - Animal Health Australia

and Japanese encephalitis.[8] These plans have been developed in consultation with stakeholders from government and industry, and support emergency disease responses to be implemented rapidly and effectively.

General public education about biosecurity is valuable. For example, the importance of obeying farm signage related to biosecurity is likely underappreciated by the general population and could pose a significant threat to disease containment efforts in the event of a disease outbreak.

Opportunistic detections also need to be considered. For example, khapra beetles were initially detected by a consumer who had purchased household goods imported into Australia. Fortunately, this particular consumer was cognisant of risks from exotic pest species, captured the beetle and contacted the appropriate authorities. The general public are likely to simply reach for the household insecticide, dispose of the dead insect and forget about it; the incursion of a potentially devastating pest species could thus go unnoticed.

Flexibility and adaptability are needed to ensure the biosecurity workforce is appropriately trained, resourced, connected and integrated to identify, detect and respond effectively and efficiently to both direct and indirect biosecurity threats. Veterinarians are critical in any emergency animal disease, as are the veterinary medicines and tools they use. Farmers and animal owners are also at the front line and must be well informed on signs and symptoms to watch for in their animals and on their properties, and know what do to if they observe something of concern.

All Australians, including those who may not have everyday involvement in agriculture, contribute to effective biosecurity responses. For example, FMD is endemic in many places that Australians travel to or import goods from regularly, including South Africa, Indonesia, Thailand and India. Travellers to regions with endemic disease threats (to animals, plants or people) expect closer biosecurity scrutiny on their return to Australia, such as the declaration and inspection of goods that may pose biosecurity risks to Australia. The recent detection and spread of FMD in Bali, a major tourist destination for Australians, has highlighted the need to ensure all Australians understand and respect biosecurity measures. This example also demonstrates the importance of working with international partners to control disease spread at the origin to prevent the disease reaching Australia. This is a key part of the current FMD response, with the Australian government donating FMD vaccines and working alongside Indonesian counterparts to vaccinate animals and control the spread of FMD in Bali.

Biosecurity in the future

Biosecurity threats to Australia may not be obvious or easy to predict. In particular, climate change will pose diverse and increasing threats to biosecurity. Changing environmental conditions will alter the distribution and behaviour of many animal and insect species, in turn leading to changing distributions of vector-borne diseases. Flies, ticks, mosquitoes and rodents are common animal disease vectors that can quickly spread into new areas in favourable environmental conditions where they have not been previously detected or routinely looked for, and where the animal (and human) population may be immunologically naïve.

Environmental changes can also result in altered disease transmission routes. For example, if the preferential target species for a mosquito is not found in the new environment, the mosquito may target a new species. Environmental stressors can also result in increased infectivity and pathogen virulence.

[8] Informing EAD Responses - AUSVETPLAN - Animal Health Australia

Biosecurity risks posed by changes to known disease distributions may be subtle and not immediately apparent, hence there is a need to ensure that biosecurity systems are responsive and capable of detecting both direct and indirect risks.

Summary

AMA believes that it is premature to draw definitive conclusions on the current biosecurity response to FMD, varroa mite and other animal diseases at this time, given that these biosecurity risks are extremely dynamic and continue to pose a significant threat to Australia.

Australia has been preparing to respond to FMD threats for more than 20 years through AUSVETPLAN and the Emergency Animal Disease Response Agreement (EADRA) for FMD. The coordinated and collaborative efforts of many key stakeholders, including Animal Health Australia, National Farmers Federation, Red Meat Advisory Council, Meat and Livestock Australia, Australian Veterinary Association, Department of Agriculture Fisheries and Forestry, the Office of the Chief Veterinary Officer and various state government departments and agencies, has been invaluable to provide clear advice to government and producers in the face of multiple EAD threats in the last 12 months.

Strong biosecurity at international, national, regional and local levels, and industry-led disease preparedness and response processes, including access to disease prevention tools such as vaccines, are critical. The priority must always be to keep exotic animal diseases *out* of Australia, rather than trying to control or eliminate a disease post-incursion. This is vital to protect animal health and welfare, agricultural productivity, industry sustainability and Australia's competitiveness in the global marketplace.