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9 December 2022

Professor Paul Kelly
Chief Medical Officer
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Scarborough House
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Submitted via unique link for Animal Medicines Australia provided by CDC Consultation team.

Dear Professor Kelly,

Re: Submission to Role and Functions of an Australian Centre for Disease Control

Thank you for the opportunity to provide comment on the *Role and Functions of an Australian Centre for Disease Control* Consultation Paper (the consultation paper).

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 are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$34 billion livestock industry and the \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

Animal Medicines Australia 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. Animal Medicines Australia members develop, register and supply innovative new medicines including vaccines and anti-infection medicines to prevent and control outbreaks of animal disease, as well as medicines and treatments that enable good health and wellbeing, and the production of food and fibre products that are safe for human consumption and use. Healthy animals are much less susceptible to disease and infection, and good animal health is essential to good animal welfare.

Public health is a cross-sectoral issue that requires coordinated One Health-based approaches. Animal and human health face shared challenges including antimicrobial resistance and threats posed by climate change. More than 60% of new infectious diseases are zoonotic – protecting animal health directly protects human health.

Animal Medicines Australia supports the proposal to establish a Centre for Disease Control (CDC) that utilises a genuine One Health approach to safeguarding public health in Australia.

Animal Medicines Australia notes that this consultation has been focused on human health. Meaningful engagement with the animal health sector would ensure that our expertise can be properly accessed. This will help to ensure that One Health principles are embedded in all potential CDC functions. Animal Medicines Australia suggests that all further consultation in relation to a CDC is open and transparent, engages with all stakeholders and includes sufficient information and timeframes for stakeholders to properly evaluate any proposal.

We are pleased to provide the following comments on the consultation paper for consideration and look forward to continuing the conversation on this important topic.

Yours Sincerely,

(unsigned for electronic submission)

Dr Charmian Bennett
Director Science and Policy

Dr Katie Asplin
Director Animal Health Stewardship

SUBMISSION TO THE
Role and Functions of an Australian Centre for Disease
Control – Consultation Paper

9 December 2022



Animal
Medicines
Australia

Introduction

Animal Medicines Australia is the peak industry association representing the leading animal health companies in Australia. Animal Medicines Australia member companies are the local divisions of global innovators, manufacturers, formulators and registrants that supply essential veterinary medicines and animal health products that are critical to supporting Australia's \$34 billion livestock industry and \$33 billion pet industry. Our members represent more than 90% of registered veterinary medicine sales in Australia.

Role and Purpose of a Centre for Disease Control (CDC)

Animal Medicines Australia notes that the consultation paper does not make any recommendations regarding the structure and governance of the proposed CDC. These are essential details that underpin the role of the CDC and facilitate its integration into the existing public health system and other systems critical to providing a One Health response.

The structure of the CDC and its position within governmental structures will dictate how much authority the agency will have, for example, to develop public health guidelines, issue public health directives (including their relationship to those issued by state and territory-based health authorities) and allocate national resources. The structure, authority and governance arrangements of the CDC have direct implications for the potential scope and function of the new agency and therefore need to be established at the earliest opportunity.

Animal Medicines Australia notes the intention that the CDC should not duplicate existing functions. To ensure this, Animal Medicines Australia considers that a gap analysis and detailed exploration of the health landscape is required. Any gaps should be clearly identified and shared with stakeholders. Such an assessment would:

- identify clear constraints for the scope of the new CDC,
- distinguish its role and responsibilities from those of the Department of Health and Aged Care, the Australian Institute for Health and Welfare and other existing agencies,
- specify its ability to make and enforce public health decisions, and
- guide its interaction and integration with existing state and territory health authorities.

A feature of the CDC must be to ensure that any public health response is risk-based and supported by credible scientific evidence. On occasion, the language used in the consultation paper indicates an intention to prioritise hazard-based assessments over a risk-based approach. A hazard-based approach to managing public health is not supported by Animal Medicines Australia.

Scope of the Proposed CDC

Animal Medicines Australia is cognisant that the consultation paper seeks to identify stakeholder sentiment regarding the purpose, scope and function of the proposed CDC. The issues presented in the consultation paper are, however, numerous, wide-ranging and vaguely defined – including pandemic preparedness and response, infectious disease, chronic disease, disability, indigenous health, social determinants of health, workforce, research, international outreach and policy.

Animal Medicines Australia would welcome clearer information on the core problem/s that a CDC will address, the gaps in the current public health system that a CDC will seek to fill and why a new public health entity is considered the most appropriate model for approaching these challenges (rather than a focus on expanded and increased resourcing of existing health entities).

The CDC should not replicate existing functions. However, many of the topics or tasks proposed for the CDC in the consultation document already exist. Animal Medicines Australia recommends that the focus of the CDC should be on adding value to existing systems, processes and resources by utilising and building connections between data sets and stakeholders to deliver public health outcomes. Evidence-based advice and expertise embodied by a CDC will therefore support the government to adhere to the principles of best practice regulation and decision-making to benefit all Australians.¹

For example, there are already many health data collection systems in operation, including cancer registries, immunisation records, notifiable diseases, Medicare and the Pharmaceutical Benefits Scheme. A CDC could offer considerable public health value by collating and analysing this data, identifying data gaps, providing nationally consistent summaries and analyses, facilitating information sharing, and ‘joining the dots’ between disparate data sets and sectors.

Animal Medicines Australia considers that the CDC must not assume a regulatory role for veterinary medicines. Australia has a robust, independent, scientific risk-based regulatory framework overseen by multiple regulatory agencies. The Australian Pesticides and Veterinary Medicines Authority (APVMA) is the principal regulator responsible for the evaluation and regulation of veterinary medicines and for monitoring compliance with the Agvet Code up to the point of sale. Various aspects of veterinary medicines are controlled by other regulators, including Food Standards Australia and New Zealand (FSANZ), Therapeutic Goods Administration (TGA), the Office of the Gene Technology Regulator (OGTR), Safework Australia, and state and territory departments of environment, agriculture and/or primary industry. In addition, veterinary medicines are subject to various additional regulatory requirements associated with trade in animals and animal-derived commodities, poisons scheduling, chemicals of security concern, workplace health and safety, dangerous goods transport and storage, packaging and disposal, waste management, retail handling and environmental protection. State and Territory governments are responsible for control of use and adherence to other relevant regulations beyond the point of sale. Each State and Territory in Australia also requires veterinarians to be registered with the relevant Veterinary Practitioners Board in the jurisdiction within which they practice.

Duplication or replication of the existing regulatory framework governing the availability and use of veterinary medicines would not be an appropriate role or function for a CDC in Australia. There may, however, be a role in exceptional circumstances for the proposed CDC to assist in accessing animal health products to maintain animal health and prevent the introduction and spread of zoonotic diseases. This could include engagement with biosecurity import permits or assisting with the distribution of animal medicines during a pandemic or animal health disease incursion. It would, however, be imperative that any such responsibilities or processes would not supersede the authority of the APVMA to authorise the use of an animal health product via product registration or permit.

It will be important for the CDC to be able to demonstrate value to the Australian public relatively quickly and establish itself as a public health authority of national importance to secure sustainable government funding. A narrow, clearly defined scope for the initial phase of the CDC will provide the best opportunity for success, thereby supporting public health capacity building and scope expansion in the future. As such, Animal Medicines Australia supports the CDC being initially focused on pandemic preparedness and risk assessment, and coordination of the National Medical Stockpile (NMS). Clear gaps in these areas were exposed by the COVID-19 pandemic where existing health

¹ Australian Government Guide to Regulatory Impact Analysis. Available at: [Home | The Office of Impact Analysis \(pmc.gov.au\)](https://pmc.gov.au)

systems did not appear to be appropriate or sufficient, and where a CDC could make a tangible difference.

Emergency public health and pandemic planning responses must include provisions to maintain essential services such as food production and transport, and essential veterinary care for animal health and welfare, while ensuring the health and safety of farmers, veterinarians, nurses and others involved in animal production and care. Accordingly, the NMS should incorporate veterinarians and animal care personnel, who require rapid access to personal protective equipment, preventative vaccines etc. to carry out their duties regarding animal health and welfare, as well as providing rapid disease control and containment services, and preventing zoonosis transmission. Animal Medicines Australia recommends that the public health workforce prioritise collaboration with the animal health sector to increase awareness and training relating to the management of zoonotic disease outbreaks.

An initial focus on emergency preparedness and the NMS will also provide the necessary time to consult more fully on the incorporation of other key public health issues in the future, once the CDC is established and operational.

Animal Medicines Australia notes that a number of ‘topics’ identified in the consultation paper would be more appropriately considered as a ‘lens’ or perspective through which a public health issue is understood and operationalised. All public health proposals should be evaluated with respect to populations with shared characteristics, contexts and/or experiences that influence their health and wellbeing, including (for example) First Nations people, culturally and linguistically diverse communities, those living with disabilities, socio-economic disadvantage, children and the elderly.

One Health Framework

Human and animal health are inextricably linked – from the health and wellbeing benefits provided by companion animals, to the everyday availability of safe, affordable and nutritious food produced using gold standard animal health and biosecurity measures, freedom from zoonoses and shared challenges such as antimicrobial stewardship. Consequently, any consideration of the effectiveness of preparedness and disease responses must include the animal health sector alongside that of human health.

Animal Medicines Australia supports the view that the CDC should provide a robust, centralised and coordinated national approach to all aspects of public health in Australia that accounts for the interactions between human, animal and environmental health. Similarly, Animal Medicines Australia supports the draft mission statement that:

The work of the CDC will be underpinned by the guiding principle of One Health – recognising the connection that exists between the health of people, animals and the environment.

While the consultation paper states the importance of taking a One Health approach, the focus of the consultation paper is clearly on human health. Animal and environmental health are barely mentioned and there is little consideration of the impacts and interactions between human health, animal health and the environment.

To operate under a genuine One Health banner, an Australian CDC must coordinate activities from all 3 key sectors– human, animal and environmental health – not simply consider the potential impacts of animal health or the environment on human health. The significant disparity between resources currently provided to the human health sector to manage public health concerns, such as

antimicrobial resistance, compared with the lack of resources available to the animal health sector, is currently prohibitive to a genuine One Health approach to managing public health in Australia. Further information is needed for stakeholders to understand and evaluate how a One Health approach could be operationalised within the CDC structure, scope and operation.

Animal Medicines Australia supports the paper's recognition that the CDC must establish early and permanent linkages with the broader public health sector in Australia using a multidisciplinary approach, in order to draw on the knowledge, skills and expertise of people working in a range of fields to deliver the best health outcomes for Australia.

Animal Medicines Australia encourages the Department to ensure that veterinarians and animal health experts are included in this multidisciplinary model, to facilitate a genuine One Health approach to maintaining critical animal health tools and services and providing expert advice during potential zoonotic disease outbreaks.

Similarly, any public health response will also interact with 'non-health' sectors, such as those involved in protecting and maintaining food safety and supply, national and state farming and livestock industry associations, the food production sector, regulators including the APVMA, transport, trade and imports sectors etc. Animal Medicines Australia urges the Government to consider not only the direct impacts that could result from the introduction of a zoonotic to Australia, but also the flow-on impacts on human health that would result from animal disease incursions and outbreaks. Significant reductions in access to nutritious, affordable food are likely if a significant animal disease, such as foot and mouth disease or lumpy skin disease, entered Australia. The 2001 UK foot-and-mouth disease epidemic resulted in up to 10 million animals being culled and was associated with profound mental health trauma for farmers, veterinarians, rural healthcare practitioners and government staff that persisted well after the epidemic had been controlled.²

The Role of Animal Health in Managing Zoonotic Diseases

60% of infectious diseases are zoonotic - they can be transferred from animals to people, and from people to animals.³ While improved animal health management in Australia significantly reduces the risk of zoonotic disease transfer to humans, transmission does occasionally occur – for example, via contact with sick animals, insect bites or contaminated food. The most effective preventive health approach to zoonotic diseases is to keep animals healthy - healthy animals are much less likely to carry infections that could potentially be transmitted to people. Vaccination, parasite control, rigorous biosecurity processes, point-of-care diagnostic technologies and other animal disease prevention tools are at the forefront of zoonoses prevention.

Animal Medicines Australia member companies play a vital role in Australia's animal health as the producers of medicines that prevent, control and treat animal diseases, including vaccines and anti-infection medicines to prevent and control outbreaks of animal diseases, as well as medicines and treatments that enable good health and wellbeing. Animal Medicines Australia members also produce many disinfectants and anti-infective products used for everyday hygiene and sanitation in animal environments, such as quarantine facilities, veterinary clinics and hospitals, boarding facilities, racing stables, grooming salons and in the home.

² *Psychosocial effects of the 2001 UK foot and mouth disease epidemic in a rural population*. British Medical Journal (2005), v331(7527). Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1289318/>

³ Global Challenges: Zoonoses. Available at <https://www.healthforanimals.org/global-challenges/zoonoses/>

The consultation paper references the National Preventative Health Strategy (the Strategy) and seeks to determine the role of the CDC in implementing the goals outlined in the Strategy. It is important to note that the Strategy makes no reference to animal health and does not take a One Health approach to disease prevention.⁴ This is inconsistent with the stated intention of the CDC. Any consideration for the CDC to be involved in implementing the Strategy should consider animal health in its disease prevention capacity. As stated previously, most infectious diseases are zoonotic – animal disease prevention is critical not just for ensuring animal health and food security, but also as a key component of disease prevention in people.

For example, the Australian egg industry partnered with state government organisations to develop resources for the detection and response to outbreaks of *Salmonella enteritidis* in eggs, which can cause foodborne illness. While not endemic in Australia, outbreaks of *Salmonella enteritidis* occur periodically; most recently in 2018 and 2019. Australian Eggs' *Salmonella Incidence Response Plan* (SIRP) provides guidance for producers when facing an outbreak.⁵

While uncommon, people can also be directly impacted by diseases that impact companion animals, livestock and wildlife. Hydatid disease caused by the tapeworm *Echinococcus granulosus* infects dogs and dingos as the primary host, although ingestion of hydatid eggs by livestock and wildlife is necessary for the completion of the parasite's lifecycle. Infection can also spread to humans, causing serious disease that often requires surgery. Hydatid disease is now uncommon in people in Australia – thanks in large part to readily available de-wormers for dogs containing praziquantel.⁶

Antimicrobial Resistance – a Critical One Health Challenge

The intention to coordinate national public health activities under a One Health framework, while avoiding duplication and maximising efficiencies, provides an opportunity for the CDC to align with and support Australia's approach to managing antimicrobial resistance.⁷ *Australia's National Antimicrobial Resistance Strategy – 2020 and Beyond* takes a similar One Health approach to addressing antimicrobial resistance.⁸ To date, however, government-supported efforts have focused on addressing antimicrobial resistance and stewardship in the human health sector.

Just as in human health, antimicrobial resistance poses a major threat to animal health, welfare and production – and consequently, food availability and affordability. Even with the highest possible standards of animal health and welfare, it is inevitable that at some point in their lifetime, some animals will develop a bacterial infection and require antibiotic treatment. Animal carers have an ethical and moral responsibility to prevent illness when possible and treat sick animals when necessary.

⁴ Australian Government (Health): National Preventative Health Strategy. Available at: https://www.health.gov.au/sites/default/files/documents/2021/12/national-preventive-health-strategy-2021-2030_1.pdf

⁵ Australian Eggs: Salmonella Enteritidis Response Plan. Available at: <https://www.australianeggs.org.au/what-we-do/leading-research/salmonella-incidence-response-plan>

⁶ Animal Health Australia: Hydatids. Available at [NSHMP-Hydatids.pdf \(animalhealthaustralia.com.au\)](https://www.animalhealthaustralia.com.au/NSHMP-Hydatids.pdf)

⁷ Antimicrobial Resistance Collaborators, 2022. Global burden of bacterial antimicrobial resistance in 2019: a systematic analysis. *The Lancet*, 399 pp. 629-655. Available at: [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(21\)02724-0/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)02724-0/fulltext)

⁸ Australian Government: Australia's National Antimicrobial Resistance Strategy – 2020 and beyond. Available at: <https://www.amr.gov.au/resources/australias-national-antimicrobial-resistance-strategy-2020-and-beyond>

Australia has one of the most conservative approaches to the use of antimicrobials in food-producing animals in the world, which is carefully regulated by the APVMA. No antimicrobials considered medically important for human health are registered for growth promotion in animals and antimicrobials considered critical for human health are prohibited for use in food-producing animals.⁹

Consequently, the risk of antimicrobial resistance developing in humans as a result of use in animals in Australia is considered low¹⁰ and, together with New Zealand, Australia reported the lowest burden of antimicrobial resistance in humans globally in 2019.¹¹ It is important, however, that efforts continue to ensure that this risk remains low and these valuable animal health tools continue to be available and effective in the future.

All of Australia's major livestock industries, including beef, dairy, pork, sheep and poultry, maintain a strong focus on promoting the responsible use of antimicrobials and minimising the risk of antimicrobial resistance in their sustainability frameworks and accreditation systems. Animal Medicines Australia has partnered with the Australian Veterinary Association to develop evidence-based antimicrobial prescribing guidelines to support best practice veterinary prescribing for all major livestock species (including horses). Once completed, these guidelines will complement the existing guidelines available for cats and dogs and form a comprehensive suite of tools for all major animal species in Australia.

A genuine One Health approach with improved national coordination and support for the *National Antimicrobial Resistance Strategy – 2020 and Beyond*¹² and its associated sector-specific action plans, would support superior health outcomes for both human and animals, minimise the risks of antibiotic resistance developing and being transmitted between humans and animals, and ensure that Australia's livestock sector maintains its strong trade market access and reputation for producing safe, nutritious, responsibly raised agricultural produce.

Climate Change and Threats to Public Health

Climate change will pose diverse and growing threats to public health. Most notably, 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 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 stressors can result in altered disease transmission routes (for example, if the preferential target species for a mosquito is not found in the new environment, it may feed on a new species) as well as increased infectivity and pathogen virulence.

⁹ Australian Government: AMR and animal health in Australia. Available at: <https://www.amr.gov.au/about-amr/amr-australia/amr-and-animal-health-australia>

¹⁰ Australian Government: Final Progress Report: Australia's First National Antimicrobial Resistance Strategy 2015-2019. Available at: <https://www.amr.gov.au/news/final-progress-report-australias-first-national-antimicrobial-resistance-strategy-2015-2019>

¹¹ Antimicrobial Resistance Collaborators, 2022. Global burden of bacterial antimicrobial resistance in 2019: a systematic analysis. *The Lancet*, 399 pp. 629-655. Available at: [https://www.thelancet.com/journals/lancet/article/PIIS0140-6736\(21\)02724-0/fulltext](https://www.thelancet.com/journals/lancet/article/PIIS0140-6736(21)02724-0/fulltext)

¹² Australian Government: Australia's National Antimicrobial Resistance Strategy – 2020 and beyond. Available at: <https://www.amr.gov.au/resources/australias-national-antimicrobial-resistance-strategy-2020-and-beyond>

Public health risks posed by changing disease distributions may be subtle and not immediately apparent. A One Health-based co-ordinating body such as a CDC, with access to information from, and the expertise to ‘join the dots’ between, the human, animal and environmental health sectors, would be ideally placed to monitor and predict both direct and indirect risks to public health.

A Holistic Approach to Public Health

The benefits of pets to human health are increasingly being recognised, with 97% of doctors reporting the health benefits of owning a pet.¹³ The improved health of pet owners has also been shown around the world to reduce the burden on health systems, with significant associated savings in health care costs.^{14,15} In Australia, these savings were estimated to be around \$2 billion, with pet owners visiting the doctor 11% less each year than non-owners.¹⁶ Pets and therapy animals are proven to alleviate stress, anxiety, depression, and feelings of loneliness and social isolation^{17,18} and pet ownership is associated with improved mental health in cancer survivors.¹⁹

Animal Medicines Australia’s *Pets in Australia 2022* report confirmed that the boom in pet ownership seen during the COVID-19 pandemic has plateaued into a “new normal”, with around 28.7 million pets now residing in 69% of households.²⁰ As highlighted in Animal Medicines Australia’s *Pets and the Pandemic* report, companionship, comfort, positive mental and physical health and unconditional love were commonly cited as overall benefits of pet ownership. Notably, 70% of respondents said that being a pet owner improved their lives during the pandemic.²¹

Despite the significant benefits that pets bring to the lives of their owners, the results of SEC Newgate’s *Mood of the Nation* August 2022 survey indicated that alongside a surge in pet ownership during the COVID-19 pandemic, there was also a surge in pet surrender driven by difficult circumstances, especially by financially and socially vulnerable pet owners. This suggests a need for supporting services that help pet owners to keep their animals through difficult times, particularly given the mental health benefits of companion animals.

Recent research demonstrates that the strong bonds between people and their pets leads to improved veterinary care – with highly bonded pet owners more likely to access preventative care such as

¹³ HABRI: New Survey Reveals 97% of Doctors Believe There Are Health Benefits to Owning a Pet. Available at: <https://habri.org/pressroom/20141027>

¹⁴ Hall et al, 2017. Companion animal economics: the economic impact of companion animals in the UK. Available at: <https://www.cabidigitallibrary.org/doi/10.1079/9781786391728.0000>

¹⁵ HABRI: Pet Ownership Saves \$11.7 Billion in Health Care Costs. Available at: <https://habri.org/pressroom/20151214>

¹⁶ Headey & Grabka, 2006. Pets and Human Health in Germany and Australia: National Longitudinal Results. *Social Indicators Research*, 80, pp. 297-311. Available at: <https://link.springer.com/article/10.1007/s11205-005-5072-z>

¹⁷ HABRI: Mental Health. Available at: <https://habri.org/research/mental-health/>

¹⁸ HABRI: Mental Health and Well-Being. Available at: <https://habri.org/research/healthy-aging/mental-health/>

¹⁹ Trigg, 2022. Examining the role of pets in cancer survivors' physical and mental wellbeing. *Journal of Psychosocial Oncology*, 40(6), pp. 834-853. Available at: <https://pubmed.ncbi.nlm.nih.gov/34155951/>

²⁰ AMA: Pets in Australia: A national survey of pets and people. Available at: <https://animalmedicinesaustralia.org.au/report/pets-in-australia-a-national-survey-of-pets-and-people-2/>

²¹ AMA: Pets and the Pandemic: a social research snapshot of pets and people in the COVID-19 era. Available at: <https://animalmedicinesaustralia.org.au/report/pets-and-the-pandemic-a-social-research-snapshot-of-pets-and-people-in-the-covid-19-era-2/>

parasiticides, vaccinations, diagnostic and screening tests, and teeth brushing for their pets.²² Improving the health of pets ensures that Australians are able to enjoy the health and wellbeing benefits of pet ownership for longer.

²² HABRI: International Survey of Pet Owners & Veterinarians. Available at: <https://habri.org/international-hab-survey/>