To Whom It May Concern:

Draft Import Risk Analysis Report for Chicken Meat

The Poultry Industry Association of New Zealand (PIANZ), contactable at the above address has reviewed the Draft Import Risk Analysis Report for Chicken Meat (IRA) and subsequently note the following points in regard to the document.

1. PIANZ supports the view of Biosecurity Australia that although the IRA is generic, country-specific data, disease prevalence and veterinary service competencies must be considered in allowing the importation of chicken meat from any country to ensure Australia’s current poultry health status is maintained. Similarly, PIANZ supports the need for on-ground audits of the poultry health status, broiler management and processing and veterinary services of any exporting country. Furthermore, we strongly believe that the minimum standards required for any facility, country or zone to pass an audit, and thereby gain access to the Australian market, must be made publicly available. Facilities countries or zones which do not meet the minimum criteria for export to Australia must, under no circumstances, be allowed access to the Australian market. Similarly the audit process should be completely transparent and the audit details of those facilities, countries or zones approved to export to Australia must also, in the interests of equity and consistency, be available to the public.

A framework for continued auditing of exporting premises and / or countries, over time, should be established.

2. Although provision is made in the IRA for on-shore processing, under quarantine control, of chicken meat which does not conform to Australia’s ALOP, there is little detail on what specific measures Biosecurity Australia would require in order for on-
shore processing to occur. However, the processing of chicken / chicken meat onshore is likely to generate a not insignificant amount of waste, including chicken meat, packaging and waste water which will require detailed and appropriate control strategies if Australia’s current level of biosecurity is to be maintained. Similarly, extensive and detailed control measures will be required to ensure the health and safety of any personnel involved in the on-shore processing of imported chicken meat which does not meet Australia’s ALOP, particularly in regards to notifiable avian influenza viruses and Salmonella Enteritidis and multi-drug resistant S. Typhimurium, and particular consideration needs to be given to these personnel as potential conveyors of bacterial or viral agents or hazards which may pose a risk to Australia’s current poultry and human health status. It would be extremely useful to stakeholders and would enable more informed comment on the appropriateness of this risk mitigation measure if further details on the proposed on-shore processing quarantine requirements were made available.

3. Although Biosecurity Australia have considered in their IRA notifiable Avian Influenza viruses as defined by the OIE, avian influenza viruses of emerging concern have been omitted. Although the relevant criteria for these viruses may appear to be more difficult to describe, it is essential that these strains of avian influenza virus, such as H9N2, be considered. Failure to establish appropriate measures for these viruses at this time may have a significant impact on Australia’s long term poultry health status.

4. Biosecurity Australia considered in the IRA the inclusion of quinolone resistant Campylobacter jejuni, however the authors subsequently decided against the inclusion of this hazard in the IRA, largely because Campylobacter is not a cause of disease in poultry flocks. However, the World Trade Organisation (WTO) Sanitary and Phytosanitary (SPS) agreement allows (importing) member countries to determine the level of sanitary and phytosanitary protection they deem appropriate for protection of their human, animal or plant life. Similarly, the argument that C. jejuni has been excluded because the issue of human pathogens is governed by FSANZ is contradictory to the statement that Biosecurity Australia have consulted with the Department of Health and Ageing who believe that “adequate provisions have been made for imported chicken meat to comply with the Food Standards Code”. As quinolone resistant C. jejuni can cause significant, and difficult to treat, disease in humans and particularly as chicken consumption is frequently held up as a major risk factor in human campylobacteriosis, C. jejuni must be considered in the application.

Similarly, although Biosecurity Australia argued that C. jejuni is a ubiquitous organism, an observation supported by PIANZ, it is not possible to argue that the prevalence of quinolone resistant C. jejuni in other parts of the world is the same as that observed in Australia, where it has in fact been found to be almost non-existent.
Biosecurity Australia further argues that the establishment of quinolone resistant *C. jejuni* in Australian poultry flocks would not have “any effect on bird health or production” and “no change in vaccination, management or processing would occur”. However, there is increasing pressure on producers to implement measures to control *Campylobacter* contamination of poultry carcasses, whilst at the same time, there is increasing consumer and regulatory focus on the use of antibiotics in animal production and subsequently on antibiotic resistance. It is therefore not reasonable to argue that the establishment of quinolone resistant *C. jejuni* in the Australian poultry flock is unlikely to result in added costs for Australian producers, while similarly if imported chicken meat attracts a 40% market share as estimated by Biosecurity Australia in the IRA, the added treatment costs for people infected with quinolone resistant *C. jejuni* will have to be borne by Australian tax-payers. PIANZ strongly believes that quinolone resistant *Campylobacter jejuni* must be included in the IRA.

### 5. The issue of production animal welfare continues to receive increasing public attention and the OIE Terrestrial Animal Health Code (2006) includes detailed guidelines for the transport of animals, the slaughter of animals for human consumption and the slaughter of animals for disease control purposes. Similarly, in recognition of the importance of animal welfare to the Australian community, the conditions under which broiler chickens are managed, produced, transported and slaughtered are laid down in several Codes of Practice, endorsed by both the Australian Chicken Meat Federation and the Australia Government. PIANZ acknowledges that there is little scope to consider animal welfare in a traditional import risk analysis.

However, the increased focus of the OIE on this issue and the inclusion of guidelines as detailed above in the Terrestrial Animal Health Code, suggests that this issue should be given the same consideration as animal diseases when considering the importation of any animal product. It is accepted that the basic tenet of the WTO SPS agreement is prevent the establishment of unjustified trade barriers (thereby prejudicing potential exporting countries) whilst still allowing (importing) member countries to determine the level of sanitary and phytosanitary protection they deem appropriate for protection of their human, animal or plant life. Based on the recent inclusion of welfare guidelines in the OIE Terrestrial Animal Health Code, it could also be argued that appropriate measures for the protection of animal welfare should be also be included in the scope of the SPS agreement. Thus, it must be noted that producers in the importing country should not be prejudiced as a result of being required to meet minimum standards of welfare above those in place in exporting countries. To ensure equity and consistency in the establishment of any import health standards, consideration must be given to the application of animal welfare guidelines and principles in the exporting country.
Consideration should also be given to the range of drugs used in chicken production in exporting countries. Whilst these are unlikely to have a direct impact on the biosecurity or health status of the national poultry flock, there are potential human health concerns, for example as a result of residues. It would be inequitable of Biosecurity Australia and other Australian regulatory authorities to impose, for example, restriction on the use of certain drugs in chicken / animal production or maximum allowable residue limits in animal products produced in Australia, whilst at the same time allowing for the importation of products which do not meet these standards from other countries. A good example of this in the context of this IRA is the use of fluoroquinolone antibiotics in many countries around the world but not in Australia and quinolone resistant C. jejuni.

The second sentence of the following statement made by Biosecurity Australia on pages 4 (part A), 3 (part B) and 10 (part B) in the IRA, is very confusing and its relevance, in its current state, unclear.

_The Australian Chief Medical Officer has advised BA that officers of DoHA are satisfied that the list of pathogens considered in the risk assessment is complete and that adequate provisions have been made for imported chicken meat to comply with the Food Standards Code. The officers are satisfied that there are no issues in this risk assessment that are not food related and that the management measures proposed by Biosecurity Australia to meet animal health concerns are appropriate to meet human health concerns._

It is our belief that an import risk analysis should cover issues not only related to food but also the biosecurity status of the production, domestic and wild animals in the country developing the IRA. The statement above would seem to suggest that this is not the case in this instance and no issues which are not food related have been included in the risk analysis - even though this is in contrast to the body of the risk analysis.

Thank you for allowing us the opportunity to comment on the Draft Generic Risk Analysis Report for Chicken Meat. Please do not hesitate to contact our offices should you have any queries.

Kind regards

Michael Brooks
Executive Director