PRAWNS AND PRAWN PRODUCTS
IMPORT RISK ANALYSIS

SUMMARY OF STAKEHOLDER RESPONSES
TO DRAFT IRA REPORT (released August 2000)

FOR DISCUSSION AT PUBLIC
STAKEHOLDER MEETINGS

TO BE HELD IN

MAY 2002

March 2002
Discussion Paper

This document represents a summary of the main issues raised in the 17 stakeholder submissions received in response to the draft Import Risk Analysis (IRA) report for Prawns and Prawn Products (released in August 2000 with AQPM 2000/41). A list of the respondents is attached. Copies of submissions are available in the Public File held by Animal Biosecurity in Canberra.

This document will be used as a focus for discussion at public meetings planned for May 2002. It does not attempt to list all of the issues raised but focuses on the main areas of concern. The issues presented in this summary have been dealt with under the following headings:

IRA Process

This category covers the IRA procedure that has been followed. It includes issues relating to the scope of the IRA, risk analysis panel (RAP) membership, the involvement of stakeholders in the process and the details of the appeals process.

General

This category deals with issues that are general in nature relating to diseases and IRAs; such as, the worldwide lack of available information on prawn diseases, the application of science in IRAs, the meaning of ‘appropriate level of protection’ (ALOP) and the relative advantages and disadvantages of qualitative and semi-quantitative IRAs.

Risk Assessment

This section outlines issues raised regarding the methodology of the risk assessments and the details of the disease-agent-specific risk assessments in the draft IRA report. It includes comments on the exposure pathways (the ways in which infected imported product could enter the Australian aquatic environment) and the effect that volume of trade could have on the level of risk. It also includes comments regarding the risk assessment for White Spot Syndrome Virus (WSSV).

Risk Management

This category summarises comments made regarding the possible and proposed risk management measures. It includes comments on the validity and effectiveness of certain risk management measures and on the costs of implementing the measures.

NOTE

Biosecurity Australia was formed in October 2000 (formerly part of the Australian Quarantine and Inspection Service (AQIS)) to undertake IRAs and provide technical advice to AQIS regarding the implementation of quarantine policy for commodity imports. As such, where submissions have used 'AQIS' in the context of Biosecurity Australia’s role we have changed this to read Biosecurity Australia.

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1. IRA PROCESS

1.1 Scope of IRA

a. Several submissions expressed concerns that the IRA did not consider a broader range of crustaceans and crustacean species. Specifically, concerns focussed on the exclusion of krill, crabs, other crustaceans, live prawns, small sun-dried Thai prawns, bulk shrimp meal for feed production and whole green prawn heads for processing in Australia.

b. Two submissions were concerned that the IRA does not address the issue of ballast water.

1.2 RAP Membership

a. There were concerns that Biosecurity Australia did not appoint a trade representative to the RAP and it was believed that Biosecurity Australia therefore did not consider that trade information was relevant to the IRA.

1.3 Stakeholder input

a. It was felt that there has been insufficient stakeholder input into the section on prawn feeds; it was thought that there was no formal process of stakeholder involvement and that stakeholder comments were not solicited.

1.4 Appeals Process

a. The IRA was criticised for providing inadequate information about the appeal processes.
2. GENERAL

a. The absence of quantification of Australia's ALOP was criticised; it was felt that numbers were necessary in order for the assessments to be meaningful.

b. It was considered that the method of determining the risks relating to prawn feed imports was not consistent with that applied to non-viable prawns.

c. A view was expressed that it is not clear when and where conservative judgements have been made, and there are no explanations for these judgements.

d. One submission considered that the report was written with a pre-conceived conclusion; that it ignores information that may detract from the Biosecurity Australia case and takes up information which strengthens the case, no matter how weak that data is. It was also felt that some conclusions did not conform to the discussions.

e. The IRA was criticised for being qualitative and thus 'subjective'.

f. It was thought that Biosecurity Australia had not applied science in a valid way in the development of the IRA. There were also concerns that science could not translate into commercial reality and that science would overrule ‘common sense’ in the decision-making process.

g. Some submissions considered that the draft IRA report was slightly vague as a result of the general (worldwide) lack of information regarding prawn diseases.
3. **RISK ASSESSMENT**

3.1 **General**

a. It was felt that the difference between 'exposure assessment' and 'establishment assessment' was not clarified and there was concern that the same risks have been counted twice in the assessment.

3.2 **Volume of Trade (Customs Tariff Codes)**

a. The point was raised that current customs codes do not differentiate between farmed and wild commodity or between cooked and uncooked commodity – so that it is difficult to quantify the volume of various categories of imported product.

b. Biosecurity Australia was asked to note that the volume of imports and relative volume with virus is correlated with the level of risk. It was felt that this issue was not addressed in the IRA.

c. Concerns were raised that the RAP did not attempt to quantify the number of prawns from emergency harvests that are imported. It was thought that the volume would be so low that risk management measures would not be warranted.

3.3 **Understanding of the Australian prawn industry**

a. It was felt that Biosecurity Australia had only grouped the wild and farmed prawn sectors together as one industry for convenience, in order to arrive at a pre-determined outcome. The submission proposed that it was both illogical and contradictory to include both wild harvest and aquaculture in definition of ‘industry’ for the purpose of assessing consequences of risk, as they are separate entities.

b. It was considered that the IRA displayed a poor understanding of the dynamics of the Australian prawn farming sector, for example the geographical distribution, pathogen pathways and the relationship between wild, hatchery and grow-out prawns.

c. It was felt that Biosecurity Australia had underestimated the significance of the prawn industry in Australia. It was considered that this approach was shortsighted and ignorant of industry trends and that therefore the policy would be redundant within 5 years.

3.4 **Consequences on native species**

a. It was considered that 'exotic' disease introduction may have more devastating effects than Biosecurity Australia has estimated, as the current state of knowledge is too poor to enable the prediction of environmental effects; virus transfer from shrimp to any other decapod crustaceans may have a more severe effect on the native crustacean fauna than the report concludes.

3.5 **Disease in wild stocks**

a. Opinions varied as to the significance of diseases in wild stocks. It was considered that the import of wild prawns did not present a significant risk, regardless of volume. Others, however, felt that as there is not enough known about the impact (of disease) on wild stocks,
it cannot be said to be a 'moderate' risk and a more cautious approach was recommended. Another submission asked that it be noted that wild caught prawns are not subject to the same intensive health examination as are farmed shrimp and that there does appear to be significant but sub-clinical infection in wild stocks.

3.6 White Spot Syndrome Virus (WSSV)

a. Concerns were raised that the draft IRA report does not fully consider the range of species that are either susceptible to, or able to act as carriers of, WSSV (including insects, polychaetes, fish, *Fenneropenaeus merguiensis* and a broad range of other crustacean species).

b. Several submissions considered that the risk assessment for WSSV was inadequate; a variety of reasons was given for this:

   . the point was raised that WSSV is known to be entering Australia in frozen prawns; it was felt that Biosecurity Australia had overlooked this information during the IRA.

   . it was felt that there had been inadequate consideration of international experience of WSSV.

   . it was thought that Biosecurity Australia had given no consideration to the impact that the introduction of WSSV would have on commercial prawn fishing in Australia.

   . one submission raised the point that in considering the consequences of WSSV, Biosecurity Australia has not based its determinations upon the facts that there are no known treatments for WSSV and it is not readily amenable to control or eradication.

   . it was felt that the argument for the loss of Japanese markets due to the establishment of WSSV in Australia was purely theoretical as WSSV has been reported in Japan and there have been no restrictions on exports from Thailand to Japan (including that of live *P. monodon*) since the advent of Yellow Head virus and WSSV in Thailand.

c. Many submissions considered that the draft IRA report had underestimated the impact that WSSV would have and felt that the proposed risk management measures were inadequate. In contrast, other submissions proposed that the risk of WSSV establishment is actually very low and so would not require any intervention / risk management measures.

3.7 Pathways - General

a. Several submissions expressed concern about the statement that competition for scraps from non-susceptible aquatic species would decrease the likelihood of susceptible crustaceans consuming scraps containing infectious organisms.

b. It was noted that the pathways by which infected product could enter the Australian aquatic environment were complex and that it is thus difficult to attribute probabilities to each pathway.

c. It was suggested that two critical pathways were omitted from the exposure assessment – the transmission from the wild to the farming sector by crabs (via intake pipes) and by prawn broodstock (into hatcheries).
d. It was submitted that the pathways assessments overlooked the fact that many prawn farms and hatcheries occur in popular recreational fishing destinations. It was felt that consequently the IRA had underestimated the possibility of transmission through the aquatic environment into prawn aquaculture ponds.

3.8 Diversion from Human Consumption

a. Several submissions felt that Biosecurity Australia had underestimated the diversion of prawns intended for human consumption to bait or berley use; that is, several stakeholders considered that this occurs very frequently.

b. Comments were made on the type of prawn that would be likely to be diverted; some felt that size was not a factor; others that processed prawns, and imported prawns in general, were too expensive to be diverted.

3.9 Bait Use

a. It was queried whether Biosecurity Australia distinguished between recreational angler use of dead and live freshwater crustacea as bait (in that live bait would be of local origin and should not be considered when assessing ‘quarantine’ risks).

b. A submission stated that the risks associated with using imported prawns for bait were high as this was a direct pathway into the Australian aquatic environment. Others considered that since not all prawns are emergency harvested that the risks associated with bait use would be negligible.

c. The point was raised that prawns are used as bait even if it is recommended not to do so and that they are hence discarded into the aquatic environment.

3.10 Processing

a. Many stakeholders thought that imported prawns would be too expensive to process, or already processed, so that there would be negligible disease risk associated with the further processing.

b. The point was made that effluent-point source discharges were significant in the establishment and spread of disease in South East Asia and Latin America; a greater number of scavengers such as crustaceans are attracted to point source outflows.

c. Some submissions considered that the risk of disease establishment via processing of imported product would be negligible as the disposal of commercial waste is regulated and its movement traced. Others felt that no commercial processing should be permitted unless there was tertiary level sewage treatment of all processing wastes.

3.11 Prawn feeds

a. It was felt that the issues on pathogen transfer by this route were not adequately considered; a submission considered that prawn meal, after processing, did not pose a disease risk.

b. Some submissions felt that the method of production of prawn feeds described in the IRA was inaccurate; the IRA was criticised for not distinguishing fully between prawn meal production and the manufacture of processed aquatic animal feeds.
4. **RISK MANAGEMENT**

4.1 General

a. It was felt that the draft IRA report had not clearly stated the current import conditions for non-viable prawns and prawn products.

b. Several stakeholders were concerned about the costs to industry (importers) for the proposed import conditions to be met (that is, the costs of certification etc).

c. It was noted that Australia does not place the same restrictions on internal (domestic) movements of prawns that it proposed for imported product; it was thought that this would not be consistent with Australia’s international obligations.

d. It was suggested that Australia should distinguish between diseased and disease-free exporting countries in the draft IRA report.

4.2 Proposed cut-off size for imports of whole green prawns

a. It was queried whether the distinction between small and large prawns is scientifically well founded.

b. The point was raised that not all emergency harvests are due to disease and not all small prawns are due to emergency harvesting.

c. A submission considered that 15g was too low a cut-off point, that it should be greater than or equal to 20g (as normal *P. monodon* harvest is 25g or greater and *P. monodon* is the main imported farmed prawn). Another submission raised the point that some minor commercial species only grow to a certain size, for which there would be significant quantities below 15g whole weight.

4.3 Proposed risk management for prawn feeds

a. Some stakeholders felt that the importation of prawn feeds was already over-regulated and that risk management measures were unjustified.

4.4 Level of restrictions on imported commodity

a. Many submissions commented on the proposed restrictions on imported commodity. Some felt that the proposed conditions did not provide adequate protection against the risk of exotic disease introduction. A range of alternative conditions were suggested including:

   . a total ban on the importation of all green products
   . allowing the importation of tail meat only (unless product was cooked)
   . compulsory irradiation of all green products
   . health certification of all green products, regardless of size
   . legislation to ban the use of imported prawns for bait.
b. Other stakeholders considered that the proposed import conditions were too rigorous. Suggestions included

- removing the ban on bait prawns (as they would be imported in low numbers and would hence present little risk of disease introduction)
- requiring health certification only for whole green prawns (as the cost of certification or other products was unacceptable)
- making wild-caught prawns exempt from the import conditions.

4.5 Monitoring of conditions

a. It was queried how AQIS would be able to monitor compliance with the import conditions, for example to monitor that cooked prawns are excluded from the proposed risk management measures.

4.6 Inspection/Organoleptic assessment

a. It was felt that there was undue emphasis on organoleptic assessments as a risk reduction mechanism without emphasising their limitations—such as that not all animals that are free from visible lesions are free from disease.

4.7 Overseas processing facilities

a. Concerns were expressed about the reliability of overseas countries’ ‘quality assurance’—type programs and about AQIS’ ability to audit the facilities.

4.8 Competent Authorities

a. Concerns were expressed regarding ‘the consistency of such an authority in developing countries’.

b. A request was made for the actual criteria for recognition of competent authorities to be provided.
LIST OF STAKEHOLDERS WHO RESPONDED TO THE DRAFT IRA REPORT

1. Ausvet Animal Services
2. Northern Territory Prawn Farmers Association
3. A Raptis and Sons Pty Ltd
4. Fisheries Western Australia
5. Queensland Fisheries Service
6. Australian Prawn Farmers Association Inc (two submissions)
7. Royal Thai Embassy
8. Government of New Caledonia
9. Primo Aquaculture Pty Ltd
10. Seafood Importers Association (Australasia)
11. Sontari Foods
12. Oceanic Food
13. Department of Primary Industry and Fisheries, Northern Territory
14. European Commission
15. Crayfish Farmers Association of Queensland – Northern Branch
16. NSW Fisheries