
Issues raised and responses to stakeholder submissions for the review of *Australian Import conditions for whole egg, egg yolk, and egg white powder from approved countries – Draft report.*

Issue 1 – Inclusion of Equivalent heat treatments

Stakeholders requested additional heat treatments considered equivalent to a core temperature of 65°C for 6 minutes be included as an additional Appendix within the review.

Response

Additional equivalent heat treatments within the conditions themselves is outside the scope of this review, however, equivalent heat treatments can be considered following application of a request for advice on equivalency on a case-by-case basis.

Issue 2 – Adequacy of evidence to support the proposed alternative parameter of 65°C for 6 minutes prior spray drying.

One stakeholder, while acknowledging it is unlikely that virus is present in the raw material used to produce egg powder, expressed a view that the proposed alternative parameters for pasteurization, 65°C for 6 minutes, prior to spray drying were not adequate to manage biosafety risks.

One stakeholder requested the Department consider the new importation requirements as an alternative option only to the current conditions in place on the pasteurisation of egg or egg yolk prior to processing into powder.

Response

This review concluded that the likelihood of viable virus being present in egg powders is lower than previously assessed and that the current literature and CSIRO report support that thermal treatment requirements for whole egg and egg yolk powders could be reduced to 65°C for 6 minutes, while still providing sufficient biosecurity risk management to meet Australia’s Appropriate Level of Protection (ALOP). The department continually reviews new relevant scientific information. If new information becomes available that indicates a change to import conditions is necessary, the department will respond accordingly.

The review recommends that the existing import conditions also continue to be accepted.

Issue 3 - Thermal treatments should not be generalized between food matrices, as food-specific protective effects can interfere in virus inactivation.

One stakeholder added that thermal treatments should not be generalized between food matrices, since there may be food-specific protective effects, such as the presence of different components, that can interfere in virus inactivation. They noted that pasteurization temperatures used in the egg industry are limited by sensitivity of egg proteins to heat treatment, and there is lack of documentation of effects of those parameters on nutritional quality and functional properties of the product.

Response

The review focused on the two primary biosecurity hazards associated with this commodity, avian orthoavulavirus 1 (AOAV-1) and avian influenza virus (AIV), and the thermal treatments required to inactivate them. Appendix 1 provides the risk matrix and a brief explanation of the department’s process for assessing overall biosecurity risk.

The review concluded that both the literature and CSIRO report (2021) indicate that a reduction in thermal treatment to 65°C for 6 minutes is sufficient to inactivate AIV and thermolabile AOAV-1 and to result in inactivation of thermostable AOAV-1 virus, for the strains tested. Australia’s import conditions provide additional risk management beyond this, with the requirement for dry

heating spray dried egg or egg yolk powder and heating egg white powder in its final packaging.

The review concluded that both the literature and CSIRO report support addition of an alternative new heat treatment option to industry standard for pasteurisation of whole egg and egg yolk powder at 65°C for 6 minutes, whilst providing sufficient biosecurity risk management to meet Australia's ALOP. The standard industry processes used in the assessment are those from Europe, Canada, the United States, New Zealand, and Australia.

The current import conditions allow for only citric acid, glucose oxidase and/or yeast to be added prior to spray drying. Specific requests regarding inclusion of different additives to the egg powder will be assessed case-by-case.

Issue 4 - Proposed heat treatment is too stringent and higher than that of the European Union and New Zealand

One stakeholder felt that the proposed heat treatment options are still too stringent and higher than that of the European Union and New Zealand whose regulator bodies came to less stringent thermal requirements. The stakeholder proposed adopting internationally recognized, less stringent thermal requirements (e.g., pasteurization) by looking to the EU and NZ regulatory body health standards. Examples of alternative heat treatments, along with parameters found in other international legislation, for whole egg yolk and egg white powders, were provided.

Response

Australia's ALOP is determined independently to any other regulatory body health standards or requirements. Importation of egg white, whole egg and egg yolk powders into Australia is permitted subject to biosecurity conditions created to manage the associated biosecurity risks to Australia.

Any proposal to accept an equivalent heat treatment can be considered following application of a request for advice on equivalency on a case-by-case basis.

Issue 5 – Global impact and risk of avian influenza

Several stakeholders expressed concern about the ongoing global impact and risk of avian influenza, including biosecurity risk of LPAI in vaccinated birds and the proliferation of HPAI and LPAI disease ongoing in the Northern Hemisphere. One stakeholder raised concern that the changes to current import conditions could substantially increase the risk of avian diseases being introduced into Australia and proliferation of disease including avian influenza. Another stakeholder stated concern about the potential risk of introduction of LPAI in vaccinated birds, which show no or only mild symptoms, and that level of confidence to prevent the export of infected product needs to be reviewed.

Response

The department acknowledges the concerns associated with AIV raised by stakeholders and the potential and significant concerns and risks to the industry associated with HPAI. The review focused on the two primary biosecurity hazards associated with this commodity, avian orthoavulavirus 1 (AOAV-1) and avian influenza virus (AIV), and the thermal treatments required to inactivate them. The review concluded that both the literature and CSIRO report (2021) indicate that the presence of any AIV in or on eggs made into egg powder is very unlikely, and any AIV that is present would be inactivated by standard industry practices used in the manufacture of egg powders. The additional requirement in Australia's import conditions provide additional risk management beyond this with the requirement for dry heating spray dried egg or egg yolk powder and heating egg white powder in its final packaging. As a result, the overall likelihood

of these viruses being present in imported powdered egg products into Australia is negligible, providing further biosecurity risk management to meet Australia's ALOP.

Issue 6 – Inconsistency with domestic, other international and export requirements

Several stakeholders raised the issue that conditions in the draft review do not necessarily reflect consistency with the requirements imposed on Australian egg product producers supplying domestically and internationally. Examples of requirements for domestic, international and export markets were provided. One stakeholder requested that proposed import conditions be consistent with these customer expectations and requirements imposed on Australian egg producers, both from a risk perspective and in the spirit of competitive fairness.

Response

Australia's ALOP is determined independently to any other regulatory body health standards or requirements. Australia's conditions allow for sourcing of eggs and/or manufacturing, based on prior assessment of their health and production systems from eligible countries. Domestic, other international and export requirements extraneous to biosecurity risk are outside the defined scope of this review and were therefore not considered.

Issue 7 – Ongoing regulatory oversight for standard industry practice and conditions for traceability and consistency of product

Stakeholder feedback supported the continual monitoring of standard industry processes across comparator jurisdictions, the assessments of production processes, industry systems and structures and the review of any changes to industry processes, systems, and structural arrangements to ensure Australia's appropriate level of protection is maintained.

Stakeholders suggested that changes to import conditions require the addition of more robust traceability protocols, decontamination of packaging and transport related materials and a requirement for a cool-down period post heat treatment as additional control measure.

Stakeholders raised concern of risk due to faecal contamination of eggs, associated with non-compliance of industry standards for cleaning and contamination of packaging, handling equipment and transport and waste disposal.

There was some support to include a level of regulatory agency oversight from producers within countries that do not currently export to Australia. One stakeholder recommended that the review incorporate a market study alongside the scientific-based approach of the review to accommodate for any real or perceived concerns of domestic producers.

Response

The department acknowledges the importance of regulatory oversight of industry standards managed by the regulatory bodies and competent authorities of approved countries.

Australia's conditions allow for sourcing of eggs and/or manufacturing, based on prior assessment of their health and production systems for eligible countries. Importation of egg powders is only permitted from approved countries, and from production facilities that have current approval by the department or the relevant veterinary authority of those approved countries. As with other commodities, countries can apply to become approved source countries subject to an assessment by the department.

Industry standards (including cleaning, packaging, storage, handling and transport requirements) are managed by the regulatory bodies and competent authorities of approved countries.

Issue 8 - Animal welfare standards

Two stakeholders raised concerns regarding the welfare standards in production of egg powders and advocated for the highest possible animal welfare standards. Stakeholders requested conditions for egg powder reflect the potential phase out of conventional cages in Australia.

One stakeholder requested the import conditions prohibit the import of eggs/egg products produced in conventional battery cage system and that conditions restrict eligible countries for sourcing of eggs and/or manufacturing, and that import of any egg products meet Australian Animal Welfare Standards for Poultry.

Response

This is outside the scope of this review. The Department of Agriculture, Fisheries and Forestry is responsible for assessing the biosecurity risks associated with the import of goods into Australia.

Issue 9 - Lowering market-entry barriers for international suppliers of egg powder and risk to the table egg industry

Stakeholder feedback included concerns that the review may lower market-entry barriers for international suppliers of egg powder and may have a negative impact on commercial viability and profitability for domestic producers. There was additional feedback from one stakeholder requesting the possible risk to the table egg industry through egg powder products be considered.

Response

This is outside the scope of this review. The importation of egg white, whole egg and egg yolk powders into Australia is permitted subject to biosecurity conditions created to manage the associated biosecurity risks, with conditions sufficient to meet the biosecurity risk management to meet Australia's ALOP. Australia's conditions allow for sourcing of eggs and/or manufacturing, based on prior assessment of their health and production systems from eligible countries. Import is only permitted from approved countries, and from production facilities that have current approval by the department or the relevant veterinary authority of those approved countries. Australia's obligations under the SPS Agreement require measures to be based on a risk assessment appropriate to the circumstances, only be applied to the extent necessary to protect human, animal or plant health, be based on science and not unjustifiably restrict trade.
