



Review of the biosecurity risks of prawns imported from all countries for human consumption – draft report webinar

Additional questions and answers

24 November 2020

Introduction

The Department of Agriculture, Water and the Environment hosted a webinar about the draft report for the *Review of the biosecurity risks of prawns imported from all countries for human consumption*. There were over 95 participants, including individuals, representatives from state and territory government, domestic industry groups and international trading partners.

Unfortunately, not all questions posed during the webinar could be answered during the event. Those questions and their answers are provided in this document.

Additional questions and answers

Table 1 Responses to questions posed during the webinar which could not be answered at the time

Question	Answer
Hello as part of the overall assessment process Dr Gross mentioned the term "least trade restrictive" how is this factor considered or "weighted" in terms of a biological risk assessment.	<p>Whilst Australia has an obligation to apply the least trade restrictive biosecurity measures, only those measures that achieve Australia’s appropriate level of protection (ALOP) and therefore allow for safe trade are selected as import conditions. When conducting the risk assessments, the approach is to first apply the least trade restrictive biosecurity measure, from a range of potential biosecurity measures, to determine if it manages risk to a level that achieves Australia’s ALOP. If it does not, progressively more trade restrictive biosecurity measures are applied until Australia’s ALOP is achieved, or it is determined no such measures exist and import is not permitted. To meet Australia’s obligations any biosecurity measure which the department considers practical and effective at managing risk to a level that achieves Australia’s ALOP must be offered as an option for importers and exporters. This means there will often be multiple import conditions for the one commodity (in this case, prawns).</p> <p>Potential biosecurity measures for imported prawns were selected from a range of pre-export and on-arrival measures considered practical and that would manage risk by reducing</p>

Question	Answer
	<p>entry and/or exposure likelihoods. An important consideration when evaluating potential biosecurity measures was the ability to confirm that the measure would be properly implemented and would deliver the desired effect.</p>
<p>What is the sampling procedure being adopted for import assessment in case of farmed shrimps. Is it grade wise or production code wise.</p>	<p>For the purposes of testing prawns for pathogenic agents of biosecurity concern, a batch may be defined by one of the following (to be determined by the competent authority, but in any case, a batch cannot exceed one shipping container):</p> <ul style="list-style-type: none"> • product from a single line in a single processing run • product harvested from a single aquaculture pond (that is, prawns harvested from separate ponds are considered separate populations for the purposes of defining a batch) • one species of prawn wild caught during one continuous fishing period. <p>Each consignment (container) will be considered as one batch unless multiple batches are specified in the container. If a batch is shipped in two containers each container will be considered a single, unrelated batch. In addition, each batch in a consignment must be labelled and clearly identifiable.</p>
<p>We have few shrimp labs which participated in PT tests with Australia for many year and the PT tests' result are good; and Lab experts from Australia also have site visits for checking the Lab condition; we also use the OIE's testing procedures. Should you consider and accept these labs as part of pre-export system of Australia?</p>	<p>It was determined through risk assessment that testing both pre-export and on-arrival for white spot syndrome virus and yellow head virus genotype 1 was necessary to manage biosecurity risks to achieve Australia's appropriate level of protection. Equivalent biosecurity measures, such as pre-export testing programs in the country of export (to be used in conjunction with an on-arrival compliance-based inspection program in Australia), will be considered on a case-by-case basis and are a government to government process which is initiated by the exporting country's competent authority. At this point in time, all equivalence assessments for prawns (including pre-export testing programs) for all countries, remain on hold while the prawn review is underway.</p>
<p>I am Rosiyady from Indonesia. I want to ask, are there any main rules regarding the export of shrimp from countries that enter Australia? is there a list of fishery importers and their addresses, especially shrimp buyers? thank you in advance and hope it will continues</p>	<p>The current import conditions for prawns are on the department's website in Animal Biosecurity Advice 2020-A03 (Department of Agriculture, Water and the Environment 2020) and on the Australian Biosecurity Import Conditions (BICON) website.</p> <p>The department is unable to provide a list of prawn importers and their contact details as that is considered protected information. However, the Seafood Importers Association of Australasia (seafoodimporters.com.au/) may able to assist.</p>
<p>One of the issues that the prawn farming industry is concerned about, particularly given the 2016 white spot precedence. Is that cumulative control measures under the current ALOP do not seem to be commensurate to providing the necessary phytosanitary protection</p>	<p>Australia has an obligation to apply the least trade restrictive biosecurity measures that can be applied to achieve Australia's appropriate level of protection (ALOP). The biosecurity measures were selected from a range of pre-export and on-arrival measures considered practicable. Following risk assessment, it was determined that a combination of head and shell removal and batch testing (pre-export and on-arrival)</p>

Question	Answer
<p>to keep white spot from a subsequent white spot incursion. In other words, prawns on shelves are still a major threat from white spot and other emerging pathogens .</p>	<p>achieves ALOP for white spot syndrome virus, so does cooking or being processed into a value-added product.</p> <p>The biosecurity measures recommended in the draft report are consistent with the current import conditions, which are more stringent than the import conditions for uncooked prawns which were in place prior to the suspension on imports of uncooked prawns in 2017.</p> <p>The department has also put in place a more rigorous approved arrangement system for holding prawn consignments, 100% seals intact inspections for all uncooked prawn consignments and a standardised testing protocol for WSSV at the department approved laboratories. Verification activities are also undertaken by the department to ensure that import controls are operating effectively.</p>
<p>Is there any scientific ability to trace country of origin of infected crustaceans (or infection itself) once the product has cleared customs in order to determine if the product originated in a 'disease free' country or container? What is the proposed process to change the status of that country to downgrade their status?</p>	<p>The department is aware that methods such as provenance testing or DNA sequencing could be used to determine the country of origin of the imported prawns, but this is not a process that has been assessed or is currently being considered by the department. The department can, if required, perform trace back activities to identify the source of prawns sold in retail stores. In the event that prawns were found positive for a disease of concern post-border, the department could cross-check with import documentation to determine whether the prawns had originated from a country recognised by the department as 'disease free' (currently only New Caledonia) or whether the prawns were imported in a consignment that had been declared as 'disease free' based on pre-export testing.</p> <p>It is hard to speculate what would be done if a disease was detected in a country, zone or compartment recognised by the department as 'disease-free' without knowing the specific circumstance. However, it is likely that if disease was detected in a disease free country, zone or compartment then imports of whole, uncooked prawns to Australia would be prohibited until the country, zone or compartment was re-established and approved as disease free by the department. The department would consider all avenues and make a determination based on the facts and an assessment of the risks.</p>
<p>how to determine ALOP for new emerging diseases where information on the disease is still limited, for examples, limited information related to agent of disease and diagnostic protocols</p>	<p>The department based its decisions on the available science. Where evidence was lacking, a judgement was made based on the strength of the available evidence. It has been noted that certain pathogenic agents will be monitored for any changes in available information due to uncertainty associated with the emerging viruses.</p> <p>The department has ongoing media and scientific literature feeds about biosecurity issues for all animal species. Those feeds are being constantly reviewed by technical experts and if an alarm is raised, we will review the risk and / or take immediate action. In addition, we communicate with our counterparts in other countries when we have questions or concerns about diseases that may be occurring in their region, if they are</p>

Question	Answer
	undertaking risk reviews similar to us or if we have questions about their import conditions.
<p>To prepare the report risk has been assessed objectively and impartially to inform ALOP. Given the seafood industry will have a different perception and appetite for risk to maintain Australia's low disease status, how is this industry view considered when determining ALOP?</p>	<p>The Australian Government, with the agreement of all state and territory governments, has defined Australia's appropriate level of protection (ALOP) in qualitative terms.</p> <p>Australia applies ALOP in a consistent way across all products (that is, aquatic animal, terrestrial animal, and plant products). The biosecurity risks associated with imported products are assessed through a science-based process. As unique risk factors and scenarios apply to each product, those risks are managed in different ways to ensure that Australia's ALOP is met.</p> <p>The World Organisation for Animal Health (OIE) recommendations for managing biosecurity risk associated with each product are also considered. For uncooked prawns for human consumption, Australia imposes conditions above those recommended by the OIE. It does this in line with its international rights and obligations and supported by risk assessments.</p> <p>All stakeholder groups are encouraged to make submissions, supported by scientific evidence where possible, about their views on the draft report. This can include any aspect of the draft report, including whether they view that the biosecurity measures recommended reduce biosecurity risk to a level that achieves Australia's ALOP.</p>
<p>At what point do trade interests in raw prawns override the interests of the emerging Australian prawn aquaculture, prawn fishing industries and ecosystem protection. Hence my earlier question about keeping protection simple.</p>	<p>As a member of the World Trade Organization (WTO) and signatory to the Agreement on the application of sanitary and phytosanitary measures (the SPS agreement), Australia has a number of rights and obligations it must follow when we implement SPS measures.</p> <p>The biosecurity measures recommended are based on science and whether they manage risk to a level that achieves Australia's appropriate level of protection (ALOP), are practical and meet our rights and obligations under the WTO. Consideration is not given as to whether the biosecurity measures would be an advantage or disadvantage to any stakeholder group.</p>
<p>Does the department acknowledge that once imported prawns leave retail supply chains, and custody is lost that end uses cannot be controlled. Would we allow foot and mouth infected mince to sit on supermarket shelves as sausage mince, 'only to be used for sausage making'?</p>	<p>The draft report states that labelling is not considered likely to reduce overall risk to an acceptable level on its own. The department views that labelling should be included as an import condition because any reduction in unintended end-use or deliberate diversion, for example as bait, is beneficial in reducing risk. Labelling forms part of an on-going education campaign and is one of a suite of biosecurity measures used in combination.</p> <p>Before uncooked prawns are permitted to be sold in Australia, they must be de-headed, de-shelled, deveined and have been tested both pre-export and on-arrival for white spot syndrome virus and yellow head virus genotype 1 with negative results. This is considered to reduce risk to a level that achieves Australia's appropriate level of protection (ALOP) by reducing entry likelihood. The draft report assumes that there is no</p>

Question	Answer
	<p>reduction in exposure likelihood for uncooked, de-headed, de-shelled and deveined, however due to the stringent testing regime applied pre-export and on-arrival the department considers risk is managed to a level which achieves Australia’s ALOP. In addition, the department manages several activities and programs to verify that Australia’s import conditions for prawns are being met and to provide assurance that ongoing trade achieves Australia’s appropriate level of protection, this includes retail testing of uncooked, de-headed, de-shelled and deveined prawns to confirm they are free of WSSV.</p> <p>Whilst breaded, battered and crumbed prawns and dumpling and dim-sum type products are not tested for WSSV and YHV1, the likelihood of these products being used for unintended end-uses is significantly lower than uncooked prawns and the risk is managed to a level that achieves Australia’s ALOP through the reduction in exposure likelihood. This is supported through past bait and berley surveys and will be verified when the department’s bait and berley survey results are available. If those results show that prawns are not being used as the draft report has described, the risk assessments may be reconsidered.</p>
<p>you appear to be relying on theory for determining that deveining is enough to eliminate risk of EHP. Why not actually do some testing to prove this? you want to be thorough but doing ZERO testing for EHP does not give much confidence</p>	<p>The risk assessment for <i>Enterocytozoon hepatopenaei</i> (EHP) was based on the available scientific information, including doses of EHP present in the head, shell and gut, the expected dose of EHP needed to cause infection and estimations of the exposure likelihood, the likelihood of establishment and spread and the overall impact of an outbreak of EHP. Deveining (in combination with head and shell removal) was estimated to reduce the entry likelihood of EHP from high to moderate, which acknowledges that there may still be small amounts of EHP present on or in the prawn meat, however, in combination with the likelihood of exposure being reduced for farmed and hatchery crustacean exposure groups due to head and shell removal, Australia’s appropriate level of protection (ALOP) is achieved. It was not considered necessary to test for EHP and application of biosecurity measures not necessary to manage biosecurity risk could be considered trade restrictive.</p>
<p>Further to the question regarding testing frequency on consignments, that are either</p> <ul style="list-style-type: none"> * declared i.e. the consignment contains uncooked prawns & so is managed under the respective pathway, and * undeclared i.e. the prawns may have been ‘snuck’ in within another seafood consignment that is not declared for containing at-risk prawns. <p>We’ve received anecdotal information that this practice has</p>	<p>Uncooked prawns which are declared are subject to 100% testing on-arrival for white spot syndrome virus (WSSV) and yellow head virus genotype 1 (YHV1), along with having to meet a suite of other import requirements including negative results for pre-export testing for WSSV and YHV1.</p> <p>All consignments imported into Australia can be randomly inspected to confirm the goods match what is declared and meet import requirements. Mis-declaration (including deliberately not declaring) would be subject to compliance investigation as this can lead to a biosecurity risk, any uncooked prawns detected would be directed for export or destruction. The department applies a range of regulatory tools to manage compliance, from routine inspections and audits, through to criminal prosecution. The Biosecurity Compliance Statement outlines the department’s approach to managing compliance with</p>

Question	Answer
<p>occurred in the past and may be an option if restrictions are tight.</p>	<p>biosecurity conditions. Additionally, the <i>Biosecurity Act 2015</i> provides the department with regulatory tools to help identify, manage and respond to non-compliance and biosecurity risk. The department can and does profile individual importers/suppliers with poor compliance history or based on intelligence, and consignments from those importers can be inspected more regularly.</p> <p>The Department of Agriculture, Water and the Environment Redline is a free call service for people to confidentially report information about suspected breaches of Australian biosecurity, meat or food inspection laws. Breaches of Australian biosecurity, meat or food inspection laws include illegal importation, providing fraudulent or misleading documentation, and bypassing directions given by the department.</p> <p>The Redline webpage on the department’s website provides further information on how to report a suspected biosecurity breach.</p>