

Stakeholder response summary

General Questions

General questions	Department response
How did the Australia conduct this biosecurity risk review?	Australia conducted this biosecurity risk analysis as a non-regulated risk analysis. More details on how Australia conducts risk analysis can be found at agriculture.gov.au/biosecurity-trade/policy/risk-analysis/conducting .
Why does Australia have import conditions for rabies virus when Australian bat lyssavirus is present in Australia?	Australia bat lyssavirus (ABLV) and rabies virus (RABV) are different viruses that produce similar clinical signs. ABLV is present in bats in Australia but spill over infection to other animals is uncommon. It has limited public and animal health implications. RABV is exotic to Australia. RABV can establish in a broad range of reservoir hosts in Australia, putting humans, animals and wildlife at risk.
Why do cats need to complete the same rabies virus import conditions as dogs?	Rabies virus can also infect cats. Cats may then transmit the infection to other animals and humans. This means that cats could bring rabies virus to Australia. The import conditions are required to prevent this.
Why do dogs and cats from group 2 approved countries need to undertake a 10-day post-entry quarantine (PEQ)?	Australia manages rabies virus risk of animals from Group 2 approved countries offshore. The 10-day PEQ is to protect Australia from other exotic diseases that might be present in imported dogs and cats.
Why do dogs and cats from group 3 approved countries need to undertake a 30-day PEQ)?	<p>A large number of animals infected with rabies virus will show clinical signs within 30-days of infection. A 30-day PEQ period allows any signs of rabies virus to be detected and verification of documentation with exporting countries if required. It also allows Australia to perform examination and testing if needed.</p> <p>However, Australia has considered the comments on the draft report and made some changes to this requirement. Dogs and cats which have their identity check done by an official veterinarian employed by the government of country of export or which have evidence of their previous export from Australia (e.g. an export permit) will only require a 10 day post entry quarantine. Evidence of this identity check or export from Australia must be provided during the import permit application process.</p>
Can't my pet do home quarantine rather than PEQ in a government facility?	The PEQ facility at Mickleham is purpose built for maintaining biosecurity for animals arriving from approved countries. Quarantine at home does not provide the same level of biosecurity control and potentially exposes Australian animals and humans to rabies virus and other biosecurity hazards.

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My pet has lived all its life inside. Why does my pet need to do PEQ?	Australia draws no distinction between dogs and cats that live inside and those that do not. The health status of an animal is always considered to be the same as other animals in that country. Therefore, the import requirements will apply regardless of where the animal is housed.
My pet is vaccinated against rabies virus. Why does it need to do post-entry quarantine?	Rabies virus vaccination is required for animals coming from group 3 approved countries. Rabies virus infection in vaccinated dogs and cats is rare but it has been documented. This means the vaccinated animals could bring rabies virus into Australia. PEQ and the other import conditions are required to prevent this. Australia monitors animals for signs of diseases of biosecurity concern during PEQ and will also verify other import documentation to ensure the animals meet Australia's appropriate level of protection.
Why are the rabies neutralising antibody titre test (RNATT) results only valid for 12 months when rabies vaccination can be valid for up to 3 years?	<p data-bbox="965 536 2101 624">World Organisation for Animal Health (WOAH) Terrestrial Animal Health Code has changed their recommendation on the validity period of RNATT results for safe movement of dogs and cats from 24 months to 12 months. Australia is changing the import conditions to align with the new recommendation in the WOAH Code.</p> <p data-bbox="965 647 2101 767">Rabies virus vaccines have different recommendations for boosters dependent on the type of vaccine and country of registration. While some vaccines have recommendations for boosters three years after the last vaccine, the animal's response to vaccine may be highly variable. This is why international standards recommend that RNATT are valid only for 12 months.</p>
Why is there no exemption for Australian origin animals?	In response to comments from stakeholders, Australia has added specific import requirements for Australian origin animals. A PEQ period of at least 10-days is required if animals are prepared in compliance with the pre-export measures and evidence of the animals were previously exported from Australia (e.g. export permit) has been provided with the import permit application.
Why does Australia classify my country as group 1, 2 or 3?	<p data-bbox="965 951 2101 1007">Australia classifies approved countries into groups based on the presence of rabies virus in both domestic animals and wildlife. Even if rabies virus is well controlled in dogs, spill over infections from wildlife to pets do occur.</p> <p data-bbox="965 1015 2101 1134">Australia also does not consider rabies virus zones in approved countries (such as cities in comparison to rural areas). Many of the wildlife reservoirs of rabies virus (i.e. bats, raccoons, foxes, skunks etc) can be found in urban areas. It is unlikely that countries have official controls to prevent dogs and cats moving from urban to rural areas. This means that there still is a risk of transmission of rabies virus to dogs and cats in urban areas.</p>
Is Australia planning to review the status of approved countries?	Australia does not plan to review the status of any approved countries at this stage. However, this may change if the animal health status of an approved country changes due to a disease outbreak (for example, if the rabies virus is reported in a previously rabies-free country) or if there are changes to official government controls.
Why is the unapproved country pathway being removed?	Australia designed the unapproved country pathway to facilitate import of companion animals from unapproved countries and via an approved country to meet Australian import requirements. However, Australia hasn't assessed unapproved countries regarding their health status and official controls. A recent increase in non-compliance and

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	fraudulent pre-export preparation and health certification of animals has shown that this pathway no longer manages the biosecurity risk sufficiently and can no longer be allowed.
Why is my country not approved to export dogs and cats to Australia?	Australia must assess and approve any new country that wishes to export dogs and cats to Australia. This process involves assessing the animal health situation and government controls within the exporting country to determine if trade can proceed safely. If a country is not approved it may not have been assessed, or may not have requested assessment, or trade may not be able to proceed safely.
Why is the residency period for group 1 countries (e.g. New Zealand) increasing to 180 days?	As Australia and New Zealand's import conditions are not aligned, companion animals that are not New Zealand born and have been recently imported do not have the same health status as New Zealand born animals. The residency requirement has increased to 180 days to ensure the biosecurity risk for non-New Zealand born animals is managed.
Why can't dogs and cats be tested for rabies virus before export / after arrival in Australia?	There are no diagnostic tests currently available for reliably detecting rabies virus in live animals. This means that dogs and cats cannot be tested for rabies virus either before or after export to Australia. Instead, an RNATT before export is used to measure the antibodies level of a vaccinated animal, to validate its protection status against rabies virus prior to export.
Can't Australia confirm my pet's identity with DNA profiling?	DNA profiling is not an internationally recognised system for identification. ISO compatible microchips are the only currently acceptable system for identification for the movement of companion animals. DNA profiling is a powerful tool that shows promise, but there are several hurdles to be overcome before it can be used for routine identification during international animal movements.
Why can't Australian embassy staff in approved countries play a role in supervising pre-export testing for dogs and cats?	Australian embassy staff do not have any authority, oversight or training to conduct this role in approved countries. Australian embassies cannot provide pre-export preparation, testing or certification. This is the role of the competent authority in the country of export.
Why can't any checks of documents (including photos and videos) be done as part of the import permit application process?	Australia already assesses and verifies documents provided as part of the import permit application process. Documents or additional information (such as videos or photos) do not provide any additional assurance about the animal's identity as they cannot be verified by the exporting country or Australia.
Why doesn't Australia have a registration system for accredited veterinarians, transporters or exporters to prepare animals for export to Australia?	Australia requires relevant details of transportation agents, importers and exporters as part of the import permit application. However, Australia does not have any legislative basis or authority to require transportation agents, importers and exporters to be registered as part of this process.
How will Australia work with exporting countries and testing laboratories to check certificates after my pet arrives in post entry quarantine in Australia?	Australia will verify certification and laboratory reports with exporting countries and laboratories as required. Many laboratories have established processes to verify laboratory reports on request, but this process can take some time.

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Why doesn't Australia require all testing to be performed at certain trusted laboratories?	Australia has no authority to approve laboratories in exporting countries. Instead, Australia accepts test results from laboratories that are recognised by the competent authority of the country of export.
Why doesn't the Australia apply stricter conditions for or suspend commercial imports?	Australia has no legislative basis to apply conditions only to commercial imports. This includes suspending commercial imports. In addition, commercial imports can be hard to detect as this would rely upon information which cannot be verified.
Why can't Australia advise IPATA or the public of people who have presented fraudulent documentation to the department?	Due to confidentiality and privacy considerations, Australia cannot release this type of information publicly.
How will Australia ensure animals met the 180 day residency requirement?	Australia will determine residency based upon the dates of sample testing for RNATTs and / or identity checks by an official veterinarian of the exporting country. Owners will not need to provide declarations about the animal's residency.

Public Submissions

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Are the number of rabies virus cases increasing globally? Is this a growing concern for Australia?	As Australia is free from rabies virus. The presence and control of rabies virus in any approved country is a concern, regardless of if cases in animals and or humans is increasing. Many countries with rabies virus have control and surveillance programs in place to reduce both human and animal cases. The World Organisation for Animal Health (WOAH) works closely with the World Health Organization (WHO) and the Food and Agriculture Organization of the United Nations (FAO) amongst others to develop international recommendations aimed at ensuring worldwide implementation of the most appropriate strategies to end dog-mediated rabies. More information on the Global Strategic plan can be found at woah.org/en/disease/rabies/#ui-id-4 .
What proof is there that there is increased commercialisation of pet trade to Australia?	The department does not currently collect data on the number of commercial and non-commercial dog and cat imports. However, the department has noted increases in applications for young entire niche breeds, which are being transported by transportation agents. This trend of animals being moved for on sale or by professional transportation agents has been recognised globally. The department has clarified this in section 2.11.1 and Table 5 of the final report.
The draft report indicated that dog imports decreased in 2021 due to pandemic disruptions. Have they increased since then in 2022?	The number of import permit applications issued to late November 2022 is 7,698, which exceed the 7,159 issues in 2019 prior to the pandemic. This reflects a sustained demand for imports into Australia.

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	<p>The number of actual imports in 2022 lags behind the import permit applications. The number of companion animals imported is 5,990. This may reflect the logistical difficulties in importing animals into Australia resulting from the disruption to airlines during the pandemic. It is less likely this reflects changes in plan by the importers as demand for post entry quarantine (PEQ) positions remains high with a waitlist for available space.</p> <p>The department has clarified this in section 2.11.1 and Table 5 of the final report.</p>
<p>More recently, there are media reports of pets being surrendered in Australia due to economic concerns. Is this having an impact on the commercialisation of dog and cat trade to Australia?</p>	<p>There is no evidence to support a downturn in imports. In 2022, the number of permit applications to late November have exceeded pre-pandemic levels. Amongst these applications, the number of applications for young entire niche breeds being moved by transportation agents (and not owners) also appears to be increasing.</p> <p>The department has clarified this in section 2.11.1 and Table 5 of the final report.</p>
<p>For animals using the unapproved pathway, shouldn't the health status of the country of origin be considered rather than that of the approved country it is exported from?</p>	<p>Once an animal has been in an approved country for an appropriate period of time (under Australia's policy this is 180 days), the rabies virus status of the original country is no longer relevant to determining that animal's health status. Consistent with this, the "unapproved pathway" will no longer be part of Australia's import conditions. Companion animals will need to move to an approved country and reside there for at least 180 days before being eligible for export to Australia.</p>
<p>Can't DNA profiling be used to identify companion animals for export? Isn't there international database that could be used?</p>	<p>DNA profiling is being increasingly used within companion animal breeding sectors to verify mating. However, the department is not aware of any country that routinely uses DNA profiling for animal identification for companion animals, either as part of an internal animal traceability system or for imports. Microchips and tattoos are the most common forms of identification used in the trade of companion animals.</p> <p>DNA profiles of companion animals are based on analysis of variations in single nucleotide polymorphisms (SNP). However there is no consensus on what SNP should be examined and no international databases that can be used for reference. In addition, DNA profiling in cats is less advanced than that in dogs.</p> <p>While DNA profiling is promising, there are many limitations on its use for international movements at this time. Should these limitations be addressed, or if other technology becomes available, the department will consider its suitability for companion animal imports as relevant.</p> <p>The department has clarified this in section 4.1.1 of the final report.</p>
<p>The justification to make the rabies neutralising antibody titre test (RNATT) laboratory report be valid for only 12 months is unclear. This is not consistent with Australian and international standards, which recommend a 3 year validity period.</p>	<p>International standards for the movement of companion animals are outlined in the World Organisation for Animal Health (WOAH) Terrestrial Animal Health Code (chapter 8.14). The current WOAH Code recommends that vaccinated dogs and cats undergo an RNATT with a result of at least 0.5 IU/mL no less than 3 months and no longer than 12 months before shipment. This standard is well</p>

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	<p>accepted by most countries. The department is unaware of any country, which accepts RNATT declarations for up to 3 years after testing.</p> <p>There is a wide range in validity periods for rabies vaccines. Some vaccines have a validity period of 3 years, others 1 year. The only vaccine available in Australia, under restricted use for exports only, has a 3 year validity period. Due to the variability in validity period between vaccines, countries and differences in individual response to vaccines, vaccine validity periods are not considered in RNATT recommendations.</p>
<p>The finding at 3.1 (“the likelihood that RABV would be present in a dog or cat imported into Australia was estimated to be high.”) cannot be fully supported by the preceding points in that section. In addition, since the last review in 2013, not a single case of rabies has presented in a PEQ animal.</p>	<p>The entry assessment (section 3.1) is about the likelihood that an animal from another country arriving in Australia would have rabies. This part of the risk assessment assumes that the animal would have had no pre-export preparation apart from an inspection. This means no testing or vaccination. As such Australia’s experience with animals complying with the 2013 import policy is not relevant to this assessment.</p>
<p>Why is additional time in PEQ required when animals could wait longer offshore prior to export? How are illegal imports on boats handled by this policy?</p>	<p>Illegal imports, such as smuggling, are not covered by this policy. These cases are handled on an ad hoc basis following an assessment of the biosecurity risk. The department has included this clarification of scope to the summary of the review.</p> <p>The 30-day PEQ period for animals from group 3 countries is to manage biosecurity risk. Verification of documentation and any additional testing can also be performed during this time. This time period is based upon the experience of other countries with imports with fraudulent documentation, and rabies infection studies. This period is consistent with the Australia’s policy pre-2013. Waiting an additional 30-days offshore prior to import does not provide the same level of assurance as PEQ. The department has added a clarification to section 4.2.1 to this effect.</p>
<p>Shouldn’t residency and vaccination requirements be increased to 210 days to account for a 30-day waiting period between vaccination and the RNATT?</p>	<p>In some cases, companion animals may need to wait an additional 30 days due to the delay between vaccination and RNATT. However, this would only affect companion animals that had never been vaccinated previously and which are older than 12 weeks of age. Rabies virus vaccination of companion animals is strongly encouraged in most countries where it is present and well controlled.</p> <p>In addition, as rabies virus vaccination recommendations will vary in different countries, it is not possible to encompass all potential combinations in the import conditions. This is why the department has chosen to address vaccination and RNATT requirements under different clauses. As such the department will keep the waiting period and residency requirements to 180 days.</p>
<p>Is a 30-day PEQ period sufficient time for an animal with RABV to develop clinical signs?</p>	<p>The 30-day PEQ period for animals from group 3 countries is to manage biosecurity risk in conjunction with all other rabies virus biosecurity measures. Verification of documentation and any additional testing can also be performed during this time. This time period is based upon the experience of other countries with imports with fraudulent documentation, and rabies virus infection studies. The</p>

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	department notes that this period is consistent with the Australia’s policy pre-2013. The department has added a clarification to section 4.2.1 to this effect.
Could the department test animals with an enzyme-linked immunosorbent assay (ELISA) once the animal is in PEQ to validate an animal’s rabies virus vaccination status and determine the need for a 30 day PEQ?	There are ELISAs available which can detect rabies virus antigens and antibodies. The sensitivity and specificity of available ELISAs is highly variable. Consequently none are validated for their application in international animal movement or trade.
Why does the department not implement a system for approved exporter/importers / transportation agents to manage the biosecurity risk?	Aside from being unnecessarily trade restrictive by stopping most people from being able to import their own animal unless they used an agent, the department does not have legislative framework to apply a system where only “approved” importers / transportation agents are eligible to import companion animals. In addition, the department has no authority to approve exporters residing in approved countries. Approval to export is based upon the relevant legislation in the exporting approved country.
If the department detects a case of rabies virus in PEQ, what happens to Australia’s animal health status? Surely the additional PEQ time would be better spent pre-export to protect Australia’s animal health status.	Under article 8.14.2 of the WOH Code, imported cases would only be considered to affect Australia’s animal health status if confirmed outside of a quarantine station (such as Australia’s PEQ) with secondary cases. This is because Australia’s PEQ facility has strict controls in place to prevent the spread of diseases of biosecurity concern from the facility to the Australian dog population. So detection of a case of rabies virus in PEQ would have no impact on Australia’s animal health status.
How does Table 12 support a 30-day PEQ period given: <ul style="list-style-type: none"> • The data is from countries without a PEQ period. • The total size of the study populations is not included in the table. • When the cited Ribadeau-Dumas et al. 2016 publication concludes that while the risk of importing rabies infected dogs to Western Europe from countries with enzootic rabies is not 0, the risk is so low (7.52×10^{-10}) that it can be considered negligible. • The median time to clinical signs/death after import is twelve days based on the Table 12 data. 	<p>Table 12 is intended to demonstrate the period from import until clinical signs and or death after importation of companion animals which were incubating rabies virus at the time of export. The lack of a PEQ period for imports into these countries does not contribute to the time until clinical signs / death.</p> <p>It should be noted that most of the cases reported in Table 12 are based on WOH reports made by the importing countries, not clinical studies. Others are case reports of incidents. As such there is no study population size which could be included in the table.</p> <p>Ribadeau-Dumas et al (2016) estimated that on any given day with a pet in Western Europe, the probability of that pet being contagious for rabies virus attributed to pet transport was 7.52×10^{-10}. This was not an estimation of risk as the estimation of risk considers both probability (or likelihood) and consequence. The consequences for countries where rabies virus is present (such as Western Europe) are not comparable to those for a country like Australia where rabies virus is not present. This means that the risk of rabies virus for a free country like Australia would be expected to be much higher than that of a country where it is endemic due to the higher consequences.</p> <p>In Table 12, six out of the eight cases represented in the table developed clinical signs or died within 30-days of importation. As taking the median or average of this data can produce quite different results, the department felt this was a less misleading representation of the data.</p>

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Why does the risk assessment fail to document and analyse statistically the variables considered to conclude the risk of imported rabies-infected animals to be high?	As outlined in section 3 of the report, the risk assessment has been conducted using a qualitative and not quantitative approach. The likelihood that an event will occur was evaluated and reported qualitatively, using qualitative likelihood descriptors for the release and exposure assessment, and the outbreak scenario in Table 7 (page 25). This qualitative analysis is consistent with the department's approach to risk assessment in several recent risk analysis reports and the standards set out in Chapter 2.1 of the WOH Code.
Will there be any difference in the conditions for assistance dogs taking multiple visits to approved countries within a single 180-day period?	Residency requirements provide for residency in both approved countries and Australia. Multiple visits may be possible as long as rabies virus vaccinations and RNATT results remain valid.
How will the new residency conditions apply to Australian assistance animals?	The draft policy formally recognises residency in Australia to be included in the 180 days residency requirement. In addition, if rabies virus vaccination and RNATT are performed in Australia prior to export, this can be used to expedite the return of animals. As outlined above, proof of export from Australia (such as an Australian export permit) would also be required.
Would the department accept import documentation from approved countries as evidence of residency instead of an identity check?	<p>The department would accept evidence of export from Australia for animals of Australian origin. This would include export permits. The department has updated section 4.1.1 and section 5 to clarify this option.</p> <p>As part of the usual import permit application process, you may submit additional information to the department to be considered for equivalency. There may be additional fees associated with this assessment.</p>
The draft report does not include the prevalence of rabies virus in the exporting countries.	The global distribution of rabies virus is provided in section 1.1. This section outlines the rabies virus status of Africa, Asia, Australia, North America, Central and South America, and Europe. The prevalence of rabies virus in approved countries in different species is not reported consistently and can be difficult to measure in wild animals. As the department does not differentiate approved countries based on the prevalence of rabies virus, but on country freedom, the prevalence has limited effect on the risk assessment.
<p>The draft report does not consider other additional biosecurity approaches:</p> <ul style="list-style-type: none"> • Improving import documentation analysis. • Supervision by an official veterinarian employed by the government in the country of export of rabies pre-export vaccinations and testing including submission of samples to the testing laboratory. • Requiring juvenile animals, who have a high incidence of vaccine failure, to have two vaccinations. 	<p>The department has considered several options for biosecurity management as outlined in section 4 of the report.</p> <p>The current process requires assessment and if required, verification of documentation at the import permit application stage. The review proposes additional verification as required during PEQ for animals from group 3 countries. Details on the types of verification that may be required can be found in section 4.2.</p> <p>Direct supervision by official veterinarians (employed by the government) of the pre-export preparation process, such as vaccination and RNATT sample collection and submission, would be unlikely to be possible in all approved countries. In most approved countries, official veterinarians</p>

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	<p>employed by the government do not perform such roles and may have limited authority to do so. This measure was not considered practicable and certifiable for most exporting approved countries.</p> <p>Vaccination was considered as a biosecurity measure. Vaccination with an inactivated vaccine prior to export to Australia in accordance with the manufacturer's directions in the country of export is recommended. As the serological response to vaccination can be variable (e.g. in juvenile animals), the serological response must be confirmed by an RNATT. If the department required a vaccination schedule which differed to that of the manufacturer's directions in the country of export, then it is unlikely that this would be complied with, and it may be unlawful in some countries. In addition, there is great variation in the number of doses recommended in a primary course depending on the age of the animal, species and vaccine. Consequently, the department does not recommend specific vaccination guidelines and instead requires the serological response to be confirmed by an RNATT.</p>
How are trade movements in the Northern Hemisphere relevant to the trade in companion animals to Australia?	<p>The department has detected or suspected intentional non-compliances and fraudulent documentation during the import permit application process or during PEQ in dogs and cats being imported into Australia. This is similar to the experience of countries in the Northern Hemisphere (Pieracci et al. 2021; Zucca et al. 2020, Cocchi et al. 2021). This is further detailed in section 2.11.</p> <p>In addition, evidence has emerged of the operation of networks in approved countries, including in the Northern hemisphere, with the intention of circumventing Australia's existing risk management measures for rabies virus. The methods detected or suspected include providing falsified or fraudulent laboratory reports and other pre-export preparation documentation (such as rabies vaccination certificates); collecting blood samples from animals not intended for export but known to be compliant with Australia's import conditions; and replacing microchips to link animals to compliant documentation.</p> <p>The department has clarified the actions that the department has taken to manage risk and maintain Australia health status in section 2.11.4.</p>

Competent Authority and Other Organisation’s Submissions

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Australian Veterinary Association (AVA)	<p>We note that since 2013, there have been no cases of rabies under the current 10 day PEQ [post-entry quarantine] system or following release in Australia. We also note that all documented cases of quarantine breakdown in other countries were associated with illegal movements, smuggling or commercial imports, not with pets accompanying their owners returning home. It is possible that lengthening PEQ is not necessary for all dog and cat imports from group 3 approved countries, and that a compromise option could be considered: i.e., lengthening PEQ to 30 days for ONLY commercial imports by commercial breeders. The Report (pg 20) notes that the UK, EU and Canada ‘recognise a different risk profile’ and have ‘different import conditions’ for pets accompanying owners versus commercial consignments. Australia could potentially adopt this same approach.</p>	<p>The trade in companion animals has changed since the last policy review in 2013. There has been increased commercialisation, either by import of animals for on sale, breeding or by the involvement of transportation agents to handle the process for owners. This change in trade has increased the biosecurity risk for rabies virus meaning the current measures are no longer appropriately manage the risk.</p> <p>The department does not have the legislative framework to apply a system where differential import conditions are applied to commercial imports. In addition, it is difficult to reliably differentiate commercial imports from pets being moved with owners. The import conditions are therefore designed to manage the risk of importing animals from that country regardless of whether it is an individual or commercial number of animals seeking importation to Australia.</p> <p>The department has made some changes to the final policy to recognise the difference in biosecurity risk presented by Australian returning animals, and those with an identity check by a government employed official veterinarian. These animals would be subject to a 10-day PEQ period if suitable documentation is provided at the import permit application stage.</p>
	<p>Given that a significant reason for the increased quarantine period is the concern for fraudulent certification (of animal ID, vaccination status, serological evidence of vaccination, etc), could a grace period or “grandfathering” be appropriate for those Diplomatic staff so affected? Australia must invest substantial trust in its Diplomatic staff - could their situation potentially be considered differently from other (especially commercial) importers? Particularly if the Australian Government could supply them with a short list of accredited and trusted vets (and laboratories) in those countries that they could use.</p>	<p>Australian diplomatic staff are located in many countries, including those that are not currently approved for the import of companion animals into Australia. The department does not have any authority to approve registered veterinarians and or laboratories for pre-export preparations in exporting countries. Any approval on the export processes and individuals involved in it must be undertaken by the competent authority of the exporting country under their legislative authority.</p>
	<p>We cannot see a timeline for introduction of the extended PEQ in the report, but urge the Department to consider some of the options and potential caveats proposed above.</p>	<p>As the report is now finalised, the implementation plan has been developed. The new conditions will be implemented from 1 March 2023. Details of implementation of changes to import conditions will be provided on the department’s website at agriculture.gov.au/biosecurity-trade/cats-dogs. The department will also directly contact import permit applicants and holders to advise them of the changes and their options.</p>

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	<p>The AVA also proposes a tightening of the system of identification and believe this is an ideal opportunity to require at least companion animals entering Australia to have a microchip which is:</p> <ol style="list-style-type: none"> 1. certified by a trusted agent in the exporting country (ie an accredited local veterinarian checks the chip number against description and at time of every test) 2. readable within Australia – unfortunately there are many cases of animals arriving with a chip, readable by Quarantine, but not by the Australian microchip scanner network and so can be “lost” once it is released into the community. (To achieve this the chip needs to be an ISO chip, not, for example, an American encrypted chip) The chip should carry BOTH a country code and a unique identifier code. Australian standard 11784: Electronic animal identification, National coding scheme requires: <ol style="list-style-type: none"> a. A 3 digit country code in conformance with ISO 3166 at bit nos 17-26 (country codes 900-998 “may be used to refer to individual manufacturers of transponders. Country code 999 is used to indicate that the transponder is a test transponder” b. A unique “national identification code” at bits 27-64 (274,877,906,944 combinations) c. It is the combination of the country code and the “within country” unique identification code that provides for world-wide unique identifiers 3. The chip should carry BOTH a country code and a unique identifier code. Australian standard 11784: Electronic animal identification, National coding scheme requires: 4. A 3 digit country code in conformance with ISO 3166 at bit nos 17-26 (country codes 900-998 “may be used to refer to individual manufacturers of transponders. Country code 999 is used to indicate that the transponder is a test transponder” <ol style="list-style-type: none"> o A unique “national identification code” at bits 27-64 (274,877,906,944 combinations) o It is the combination of the country code and the “within country” unique identification code that provides for world-wide unique identifiers <p>The animal and its chip should be registered on one of the National microchip databases before release from quarantine, as well as with the State/Territory government / local council of the</p>	<p>The department notes the AVA recommendations regarding microchips. Most of these recommendations are part of the current import conditions. Microchips must be ISO compatible microchip and implanted prior to commencing pre-export preparations. This microchip must also be verified by the preparing private veterinarian each time the animal undertakes any preparation for export to Australia. Microchips are scanned while in PEQ and animals are not released if these do not match those listed on the certification. The department is not able to require animals to be registered on national microchip databases prior to release from quarantine as this is not a direct biosecurity measures to manage a disease risk. However, the department can recommend that animals be registered as soon as possible after release.</p>

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	<p>animal's proposed residence. This will allow for ongoing traceability of imported animals.</p>	
<p>Canadian Food Inspection Agency (CFIA)</p>	<p>One of the proposed changes includes the requirement for an Official Veterinarian from the exporting country to scan the microchip of all dogs and cats at least 180 days prior to export. While Canada recognizes Australia's purpose for implementing additional measures to adequately verify an animal's identity in order to reduce the risks of fraudulent documentation and further safeguard against serious animal health diseases, the proposed requirement is not feasible for the CFIA considering both Canada's established export certification framework and geographical distribution. The implementation of such a requirement would result in Canada's inability to continue exporting dogs and cats to Australia. The CFIA's current export framework and process for the export of dogs and cats utilizes licensed Canadian veterinarians to complete all required pre-export examinations, testing, treatments, etc. The export certification and all supporting documents are then brought to a CFIA Official Veterinarian for review and subsequent endorsement if all of the importing country's requirements have been adequately met. The CFIA Official Veterinarian also confirms that the veterinarian who completed the certificate is appropriately licensed. Exporters do not bring their dog or cat to the CFIA district office, as CFIA Official Veterinarians are not involved in the examination, testing, treatments, etc. of the dogs/cats and CFIA facilities do not have the capacity or infrastructure to safely house and manage animals. Additionally, given the vast geographical nature of Canada, there are often exporters in remote areas of the country who are not feasibly able to physically attend a CFIA district office. In such cases, certification and documentation is couriered from the exporter to the CFIA district office for review and subsequent endorsement, and then again returned to the exporter prior to travel. As such, it would not be possible for a CFIA Official Veterinarian to scan the microchip of these dogs and cats intended for export. The CFIA respectfully requests that Australia consider other alternatives to ensure that dogs and cats can continue to be exported from Canada to Australia. One such option could include written confirmation, either in the form of a veterinary declaration or certification that is completed by the licensed veterinarian and then endorsed by a CFIA Official Veterinarian, that the microchip has been scanned by the licensed Canadian veterinarian and the animal has the same microchip as mentioned on all documentation. This type of measure provides additional assurance that the identity of the animal has been appropriately verified, meeting Australia's intent, while working within Canada's export framework.</p>	<p>The department is able to consider equivalency to the proposed conditions if the official systems and controls of the competent authority of the export country provide the same assurance and outcomes. The department is happy to have such discussions directly with the relevant competent authorities during negotiation of suitable certification.</p> <p>Updates have been made to the final report to provide animals from group 3 countries with two options; one that requires an official veterinarian to confirm the animal's identity before import permit application, and another that does not require this identity check, but includes a longer period of PEQ.</p>
	<p>Another proposed change identified in the Review of rabies virus risk in imported dogs, cats and canine semen from approved countries – draft report, is the requirement for dogs and cats to have continually remained within an approved</p>	<p>The 180 day residency requirement will be based upon the date of the identity check and or RNATT, which occurs at the time of import permit application. The department acknowledges that certifying the residency of a companion animal</p>

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	<p>country for 180 days prior to export to Australia. The CFIA would require additional information regarding how this requirement will need to be certified in order for the CFIA to evaluate whether this condition will have an impact on trade. We respectfully submit these comments for your consideration and hope that we can continue to work together to come up with a plan that will continue to meet Australia's required assurances while working within CFIA's export framework and abilities.</p>	<p>may be difficult based on the systems in most approved countries. Consequently, we will not be asking for direct certification of this residency period. Instead, model certification will ask about the date of the identity check (if performed), and the department will include the eligibility dates on all granted import permits.</p>
<p>The United Kingdom's Department for Environment, Food and Rural Affairs (Defra)</p>	<p>The identification check and declaration by an official veterinarian seems like an unnecessary administrative burden, with little additional benefit to be gained, especially if the residency requirement is added to the veterinary health certificate. The animal's microchip is recorded in the RNATT [rabies neutralising antibody titre test] declaration and the EHC [export health certificate], which are both completed by an Official Veterinarian. In our view this is sufficient documentation as evidence of the animal's microchip.</p>	<p>The department agrees that there is already sufficient evidence of the animal's microchip in pre-export preparations, and notes this is also confirmed on arrival in Australia. However, this change is a necessary biosecurity measure to provide additional assurance of the animal's residency. The department will not require a declaration of residency on the veterinary health certificate. This is because the identity declaration provides evidence of residency.</p> <p>Following consideration of all comments, the department has amended the recommended import conditions to allow that animals from group 3 approved countries with the identity check performed by a government employed official veterinarian will require only a 10-day post-entry quarantine (PEQ). Other animals (except Australian origin animals) will need to complete at least a 30-day PEQ. Noting that all animals will still require their microchips to be scanned by preparing veterinarians each time they administer treatments or tests required as part of the import conditions.</p>
	<p>The UK's rabies free (WOAH) status means exports to Australia from the UK are lower risk than some other Group 3 countries. We would request consideration that the new import conditions take this status into account, as we do not consider more stringent requirements necessary for movements of these animals coming from the UK.</p>	<p>As outlined in section 4.1.1, the department performs its own assessment whether a country is free from rabies virus (RABV). As part of this assessment, the department considers whether a country is free from RABV in all species and not just in domestic dogs. The assessment also considers the competent authority's import conditions, border controls, laboratory and surveillance systems. Any WOAH self-declarations of RABV freedom may also be considered as part of the assessment.</p> <p>Countries wishing to improve or gain market access for companion animals exports to Australia should request such an assessment. The department schedules these assessments based on prioritisation and expected trade. Any details about the trade volume should be provided in this request to allow the department to prioritise appropriately.</p>
	<p>We understand the reasoning behind this increased requirement of 30 days PEQ based on the evidence gathered from other countries where signs of rabies presented in imported animals beyond 10 days from import. However, these countries do not have the same level of stringent requirements as Australia, and we are aware that Australia</p>	<p>The trade in companion animals has changed since the last policy review in 2013. There has been increased commercialisation, either by import of animals for on sale, breeding or by the involvement of transportation agents to handle the process for owners. This change in trade has increased the biosecurity risk for</p>

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	<p>has not seen any cases of rabies during quarantine or following release. Therefore, due to the other robust measures Australia already has in place, we do not consider that it should be necessary to extend the post entry quarantine period.</p> <p>We are especially concerned that this extended quarantine period will be met with reluctance from owners, potentially meaning they decide not to move their animals. The review highlights the increased risk due to the commercialisation of trade. Therefore, if this requirement is deemed necessary in cases of commercial movement, we would request consideration that the quarantine period for non-commercial moves (e.g. pets travelling to accompany their owners) is not increased as these animals present a lower risk. A pet owner could be required to provide evidence that the pet movement is non-commercial in nature (i.e. a pet or assistance dog belonging to an owner rather than a pet intended for sale or rehoming) by signing a declaration stating the nature of the movement, and stating that the owner is making the same journey within a certain timeframe of the animal's movement. The owner could also be required to provide evidence of their journey (e.g. copies of flight tickets and addresses where they are staying) to the competent authorities in Australia in advance of their animal entering the country. This is similar to the import system used specifically for non-commercial pet movements into the UK from certain countries.</p>	<p>rabies virus meaning the current measures are no longer appropriately manage the risk.</p> <p>The department has been managing these detected and suspected non-compliance and fraudulent documents on an ad hoc basis. This has included requesting additional information from permit applicants, revoking of import permits, verification of documentation with exporting countries, quarantine and in some case, re-export. However as this is a global issue, this management is no longer feasible and sustainable.</p> <p>The department does not have the legislative framework to apply a system where differential import conditions are applied to commercial imports. In addition, it is difficult to reliably differentiate commercial imports from pets being moved with owners. The import conditions are therefore designed to manage the risk of importing animals from that country regardless of whether it is an individual or commercial number of animals seeking importation to Australia.</p>
<p>International Pet and Animal Transportation Association (IPATA)</p>	<p>In summary, our response identifies that the proposed changes do not take into consideration the rapidly reducing number of cases and outbreaks globally in the Department's risk assessment.</p>	<p>The department notes that the view that the number of RABV outbreaks is decreasing is based upon data from WOAAH collected from official reports by the 189 member countries. The reduction in cases reported in 2020-2022 (year to date) coincides with a decrease in official reports most likely due to the SARS-CoV-2 pandemic. The veterinary services were heavily challenged during the initial years of the pandemic, which often led to delays or decreases in reporting to WOAAH. In the same dataset from WOAAH (available at wahis.woah.org/#/dashboards/qd-dashboard), the number of official reports from member countries in 2018 was 3252, in 2019 was 2956, in 2020 was 1901, in 2021 was 976 and in 2022 (year to date) was 60. These official reports include not just disease reporting but also the biannual reports all member countries are required to submit.</p> <p>The World Health Organisation estimates that rabies virus causes 59,000 human deaths annually (https://www.who.int/health-topics/rabies#tab=tab_1). However due to underreporting, this number is considered to be an underestimate. The majority of cases in humans are caused by the bites of an infected dog. There is no evidence of a decrease in human cases which would be expected if animal cases were also declining.</p>

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		<p>Global initiatives such as the “Zero by 2030” strategic plan sets out a framework for countries to implement their own controls to eliminate human cases. While vaccination is a core part of this plan, it is up to countries to take steps to implement this. At the moment, this plan has not been adopted by all endemic countries and vaccination rates have not reached sufficient levels to see an effect on global cases.</p>
	<p>Additionally, whilst we agree that pre-export requirements should be strengthened, we feel that under the majority of proposed controls in addition to current ways of working, post-entry quarantine for animals imported from Group 3 countries like the USA, UK and Germany actually starts after ~180 days of monitoring, so the impact of changing duration of quarantine up to 210 days is statistically negligible for monitoring animals.</p>	<p>A residency requirement of 180 days for dogs and cats from group 2 and group 3 approved countries is required based on the incubation period for RABV. This 180 day residency is not subject to the same level of robust official controls as the 30 day of PEQ, so they should not be considered together.</p> <p>However, following consideration of all comments, the department has amended the import conditions to allow that animals from group 3 approved countries with the identity check performed by a government employed official veterinarian will require only a 10-day PEQ. Other animals (except Australian origin animals) will need to complete at least a 30-day PEQ. Noting that all animals will still require their microchips to be scan by preparing veterinarians each time they administer treatments or tests required as part of the import conditions.</p>
	<p>For countries that have a comparable standing to Australia on both managing rabies and monitoring/preventing import of animals into their countries from high-rabies zones such as the US and United Kingdom, who constitute a high volume of Australia’s animal imports, subjecting animals to 30 days quarantine from these countries is excessive.</p>	<p>Australia is free from rabies virus. The department does not consider the US and UK to be free from rabies virus, either due to the presence of strains in wildlife or due to their import controls. The department considers only group 1 countries (for example, New Zealand) as having equivalent rabies status.</p> <p>The 30 day quarantine period for animals from group 3 countries is to manage biosecurity risk. This time period is based on the experience of other countries with imports with fraudulent documentation, and rabies infection studies. The department notes that this period is consistent with Australia’s policy pre 2013. As rabies virus is exotic to Australia, the department cannot consider allowing post-entry quarantine to be completed outside the department’s quarantine facility. The department has added a clarification to section 4.2.1 to this effect.</p> <p>Following consideration of all comments, the department has amended the recommended import conditions to allow that animals from group 3 approved countries with the identity check performed by a government employed official veterinarian will require only a 10-day PEQ. Other animals (except Australian origin animals) will need to complete at least a 30-day PEQ. Noting that all animals will still require their microchips to be scanned by preparing</p>

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		veterinarians each time they administer treatments or tests required as part of the import conditions.
	<p>Implementing an alternative categorisation of group 3 countries (proposed in our response) into: a) Low risk RABV-controlled countries where we have sophisticated pre-export controls and mechanisms are required 10 days quarantine (or 30d by exception based on import specifics), and b) Higher-risk RABV-controlled countries where there are less stringent controls or are known to have criminal activity (for example) based on a structured set of criteria that will require 30 days quarantine. The proposed alternative still allows for animals from 3a countries that are showing signs of risk (be it fraudulent papers, criminal activity or symptomatic behaviour) to be held (by exception) for 30 days, and should a country's imports consistently be flagged, enables the Department to transition them to a 3b country (and vice versa for when the risks appear to be mitigated). The industry has also included other common-sense but anecdotal opportunities and observations identified in our report that are provided for consideration.</p>	<p>Any consideration of a country's approval status was out of scope for the review as this would require a formal assessment of the health status and official controls of all approved countries.</p> <p>However, following consideration of all comments, the department has amended the import conditions to allow that animals from group 3 approved countries with the identity check performed by a government employed official veterinarian as part of the import permit application will require only a 10-day PEQ. Other animals (except Australian origin animals) will need to complete at least a 30-day PEQ. Noting that all animals will still require their microchips to be scanned by preparing veterinarians each time they administer treatments or tests required as part of the import conditions.</p>
	<p>1. Replace the E. Canis blood test with a second rabies blood test within 30 days (or 90 days) of export</p> <p>a. This could also be drawn by a different vet to further mitigate the risk of fraudulent papers</p> <p>b. There could be additional "declarations" by 3rd party or independent (OIE or gov't approved) vets of the paperwork and microchip details</p>	<p>The RNATT is to test for the antibody level of the animal which provides confirmation of previous vaccination against RABV. It is not a diagnostic test to check if the animal is infected with RABV. Therefore, repeated RNATTs (pre-export or in PEQ) do not provide any additional information regarding the animal's health status.</p> <p>The finalised import conditions include the additional identity declaration by a government employed official veterinarian. This provides additional assurance about the animal's microchip and residency. The department notes that WOAHP does not have a system in place for approving veterinarians.</p>
	<p>2. Require the bloods to be tested at an OIE approved facility</p> <p>a. This was a clear gap in the risk controls put in place by the Department in its proposed report</p> <p>b. Alternatively, having the blood test done in Australia (if feasible) at the CSIRO facility (linked with microchip numbers) will also increase or improve the controls over fraudulent activity, without requiring blanket rule quarantine for all animals from Group 3 countries.</p>	<p>There are only 12 WOAHP reference laboratories for rabies, which are located in the People's Republic of China, the Republic of Korea, the United States, Israel, Mexico, Romania, India, Canada, Germany, South Africa, France and the United Kingdom. The import conditions, allow the RNATT to be performed in a laboratory recognised by the exporting approved country. This is necessary as that exporting country must be able to certify to the testing at that laboratory. This may not be the case with all WOAHP reference laboratories for all approved countries.</p> <p>The Australian Centre for Disease Preparedness (ACDP) is not a WOAHP reference laboratory for rabies. The conditions allow for testing at ACDP if recognised by the exporting approved country. Requiring all RNATTs from all imports to be performed at ACDP would require an expansion of capacity at ACDP to handle</p>

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Poland's Chief Veterinary Officer	<p>I note that the wording of the sentence</p> <p>“Similarly in April 2022, the United Kingdom suspended commercial imports of dogs and cats from Ukraine, Belarus, Poland and Romania following an increase in rabies biosecurity risk.”</p> <p>suggests that the restrictions applied to the whole of the UK, while they did not apply to Northern Ireland.</p> <p>Moreover, the draft report does not indicate that these restrictions were introduced due to the emergency situation related to the influx of war refugees with accompanying animals from Ukraine without fulfilling import conditions in accordance with the EU derogation and, as indicated by the UK authorities, limited quarantine for animals of war refugees in the UK. Later, the UK reported that the suspension of imports was based on its assessment of the increased risk of rabies, but did not indicate data on the increased prevalence of rabies due to the influx of these animals.</p> <p>In addition, I would like to inform you that the British side has limited these restrictions temporarily and territorially — as of 29 October this year, they apply only to Scotland and Wales.</p>	<p>the volume and would not address the issues of sample integrity for samples collected outside Australia.</p> <p>The department acknowledges that the United Kingdom announced of new rules for commercial imports of companion animals from Belarus, Poland, Romania and Ukraine on 25 October 2022, after the release of the draft report. The department has updated section 2.11.4 to include details on the new arrangement to manage the increased biosecurity risk associated with these imports.</p>
Public Health Association of Australia (PHAA)	<p>Clarification as to why rabies free neighbouring countries should require as thorough an identification process [microchipping] as countries which do pose a true risk is necessary.</p> <p>It is recommended to reassess the assumption that RABV is absent or well controlled in group two and three countries, importation from South Africa should pause and greater transparency as to how countries are decided as approved/non-approved is urgently required.</p> <p>To prevent pet owners from wasting their resources on what could be an invalid RNATT, the Department should include on its webpage that four weeks post vaccination is optimal for completing the RNATT.</p>	<p>The identity check is required for group 2 approved countries as these countries import companion animals from other countries. This identity check prevents animals being moved through these group 2 approved countries to Australia without meeting Australia's requirements. A clarification has been added to section 4.1.1 to explain the rationale behind this requirement.</p> <p>The department will review a country's approval status if there is a change in the animal health situation, their official controls, trade or in response to non-compliance. Further details on the basis of prior approvals and the reasons for review are provided in section 4.1.1. Any changes to the current list of approved countries is outside the scope of this review.</p> <p>The department already provides detailed instructions on how to prepare companion animals for export to Australia in step by step guides (agriculture.gov.au/biosecurity-trade/cats-dogs/step-by-step-guides). This includes the recommendation that owners wait at least 3-4 weeks after vaccination to collect blood for an RNATT.</p>

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	<p>If the Department has evidence that there have been recent problems with the current 90-day residency in NZ, then there should be transparency in their rationale.</p>	<p>The rationale for the residency requirements is provided in section 4.1.1. The reduction to a 90 day residency requirement for New Zealand was due to the close harmonisation in biosecurity measures between Australia and New Zealand. However, with the finalisation of this new policy, this is no longer the case. Evidence has emerged of the operation of networks in and via many approved countries with the intention of circumventing Australia’s existing risk management measures for RABV. Clearly articulating the 180 day residency requirement will ensure that the through trade in companion animals via New Zealand is managed appropriately in terms of RABV biosecurity risk. We have clarified this in section 4.1.1</p>
	<p>With the advances made in the field use of oral rabies vaccines in dogs (Freuling et al., 2022), it is recommended that emergency registration of a suitable oral rabies vaccine be investigated especially for use in free roaming dingos, foxes and feral cats.</p>	<p>Australia’s emergency preparedness for an incursion of rabies virus, such as use of oral rabies vaccine for wild and feral animals is beyond the scope of the risk review. Australia has an AUSVETPLAN for lyssaviruses which details the emergency animal disease response (available at animalhealthaustralia.com.au/wp-content/uploads/dlm_uploads/2021/05/AUSVETPLAN-ResponseStrategy_Lyssaviruses-1.pdf).</p>
	<p>Therefore, it is imperative to have a coordinated, well-funded and robust Australian CDC to monitor incursions and work across relevant departments to effectively control and eliminate the spread of zoonotic diseases.</p>	<p>The need for an Australian centre for disease control is beyond the scope of this risk review.</p>
<p>Royal Society for the Prevention of Cruelty to Animals (RSPCA)</p>	<p>The RSPCA would like to highlight the potential welfare risks to animals having to undergo quarantine and the associated stress from being in the kennel environment, which is likely to be exacerbated by longer stays. Welfare concerns include the restricted environment and lack of enrichment, noise stimulation, exposure to novel stimuli, disrupted routines, social isolation (from conspecifics and people), reduced exercise and control over their environment, and the lack of opportunity to perform behaviours which the animals are strongly motivated to perform. The stress experienced by cats and dogs in quarantine kennels could have mental and physical impacts which could negatively influence their welfare, health, and behaviour (both in the short term and potentially longer term), particularly with prolonged exposure to stress. There may be additional concerns for animals of specific life stages, such as younger animals in an important stage of cognitive and behavioural development or elderly animals who may have cognitive decline. It is important that thorough consideration is given to ensuring that there are measures put in place which mitigate the potential welfare risks and make the quarantine experience as comfortable and tolerable as possible. Particularly where animals are staying for at least 30 days (and possibly a lot longer in certain circumstances), extra care must be taken to ensure that</p>	<p>The department thanks the RSPCA for these comments on animal welfare. This risk review considers new and relevant scientific information, and relevant changes in industry practices and operational practicalities. Animal welfare is not in the scope of the biosecurity risk review. We have added a clarification to the summary about the scope of the risk assessment.</p> <p>The department’s PEQ facility at Mickleham in Melbourne operates in line with industry best practices. Animals are monitored throughout the quarantine period for any signs of illness and there are procedures in place to deliver veterinary care as required.</p>

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	<p>all aspects of the animal’s environment and care meet the animals’ mental and physical needs as much as is possible under quarantine conditions. It is also vital that the animals’ welfare and health are closely monitored and any concerns addressed promptly and effectively.</p>	
Singapore National Parks Board	<p>While we appreciate the need to enhance traceability, we would like to propose to DAFF to consider having clinical records from licensed veterinarians, including declaration of microchip verification (at least 180 days before export to Australia) as basis for an official veterinarian to certify in the export health certificate. All practicing veterinarians in Singapore are licensed and abide by conditions of licensing, including the code of ethics. All dogs and cats exported to Australia will also have their microchip scanned and verified by Authorised Officers of the veterinary authority at the point of export.</p>	<p>The department can consider equivalency to the proposed conditions if the official systems and controls of the competent authority of the export country provide the same assurance and outcomes. The department is happy to have such discussions directly with the relevant competent authorities during negotiation of suitable export health certification.</p>
The United States (US)	<p>“Dog and cats must not have resided in unapproved countries during the 180 days prior to export to Australia.”</p> <p>We would like to clarify that this statement would be made based on owner attestation, as this would otherwise be difficult to verify.</p>	<p>The 180 day residency requirement will be based upon the date of the identity check or RNATT, which occurs at the time of import permit application. The department acknowledges that certifying the residency of a companion animal may be difficult based on the systems in most approved countries. Consequently, we will not be asking for direct certification of this residency period. Instead, model certification will ask about the date of the identity check (if performed), and the department will include the eligibility dates on all granted import permits.</p>
	<p>We would like to confirm that the identity check could be done by a USDA accredited veterinarian and the document endorsed by USDA APHIS. Accredited veterinarians have undertaken special training and are officially designated by USDA to perform certain work on our behalf, including identification of animals. If required to be done by a USDA APHIS government official, this would not be feasible due to logistical challenges of travel, cost, and availability of USDA staff.</p> <p>Additionally, in order to accommodate animals that begin export preparations in one approved country (e.g. Canada) and are exported from another approved country (e.g. United States), we propose changing “by the exporting country’s competent authority” to “by an approved country’s competent authority.” Upon endorsement of the export health certificate, USDA APHIS will verify that the animal’s identity matches on all documents, including the identity check document (which in some cases may be issued/endorsed by another approved country’s competent authority, e.g. CFIA).</p>	<p>The department can consider equivalency to the proposed conditions if the official systems and controls of the competent authority of the export country provide the same assurance and outcomes. The department is happy to have such discussions directly with the relevant competent authorities during negotiation of suitable certification.</p> <p>For the example of companion animals beginning preparation in Canada, and then completing preparation in the United States, the department is happy to discuss specific variations to accommodate this situation during veterinary health certification negotiations.</p>
	<p>The review states, “Smith et al. (2021) suggested a 30-day waiting period would have reduced the likelihood of entry of rabid animals into the European Union and the</p>	<p>In section 4.2.1, , the report states “ Smith et al. (2021) suggested a 30-day waiting period would have reduced the likelihood of entry of rabid animals into</p>

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	<p>United States in most recent cases associated with fraudulent certification.” However, the Smith et al. paper supports reducing the post-titer waiting period from 90 days to 30 days. We do not believe this paper supports a 30-day waiting period (post-entry) in addition to Australia’s existing 180-day waiting period (pre-export). The Smith et al. paper states, “We found the three-month waiting period is not supported by current evidence and is unnecessarily restrictive which could increase the risk of non-compliance such as falsification of vaccination certificates and serology reports.”</p> <p>Extending the post-entry quarantine for compliant animals from 10 days to 30 days is a significant change that will likely cause additional stress on the animal, as well as the owner. The United States requests that consideration is given to completing part of this quarantine period in-home.</p>	<p>the European Union and the United States in most recent cases associated with fraudulent certification”. However, following comments from multiple stakeholders it is clear that this statement has been misinterpreted. The department will add further clarification to this section to ensure it is clear that this waiting period is pre-export and immediately following serological testing.</p> <p>The 30 day quarantine period for animals from group 3 countries is to manage biosecurity risk. This time period is based upon the experience of other countries with imports with fraudulent documentation, and rabies infection studies. The department notes that this period is consistent with Australia’s policy pre 2013. As rabies virus is exotic to Australia, the department cannot consider allowing post-entry quarantine to be completed outside the department’s quarantine facility. The department has added a clarification to section 4.2.1 to this effect.</p> <p>However, following consideration of all comments, the department has amended the import conditions to allow that animals from group 3 approved countries with the identity check performed by a government employed official veterinarian will require only a 10-day post entry quarantine. Other animals (except Australian origin animals) will need to complete a at least 30-day PEQ. Noting that all animals will still require their microchips to be scan by preparing veterinarians each time they administer treatments or tests required as part of the import conditions.</p>