U.S. COMMENTS ON G/SPS/N/AUS/242:

AUSTRALIA'S DRAFT IMPORT RISK ANALYSIS FOR HORSES FROM APPROVED COUNTRIES

BEGIN COMMENTS:

The United States appreciates the opportunity to review and comment on Australia's Draft Import Risk Analysis Report for Horses from Approved Countries. This measure was notified to the World Trade Organization (WTO) as G/SPS/N/AUS/242 on December 10, 2009.
Our comments and recommendations with regard to specific sections of the import risk analysis (IRA) are as follows:

3. Method for Import Risk Analysis

A. Generic Approach

In general, the United States is concerned that Australia's generic approach to risk analysis appears to disregard many important country-specific factors that affect risk. For example, Article 2.1.2 of the Terrestrial Animal Health Code of the World Organization for Animal Health (OIE) states that "the evaluation of Veterinary Services, surveillance, and control programmes and zoning and compartmentalization systems are important inputs for assessing the likelihood of hazards being present in the animal population of the exporting country." We acknowledge that maintaining a list of approved countries for equine export takes into account factors such as veterinary services, animal health controls, and effectiveness of laboratory and certification systems in specific countries. However, Australia's system does not appear to take into account factors such as differences in disease prevalence between approved countries.

For example, in section 5.16.2, the estimate of the likelihood of release of equine piroplasmosis is, in part, based on the 30-98% prevalence of equine piroplasmosis in endemic areas. While equine piroplasmosis is currently present in the United States in limited outbreaks, there is no evidence that the prevalence of infection is near endemic levels. This leads to an inflated estimate of risk of release of equine piroplasmosis associated with horses from the United States. The OIE Code, Article 2.1.4, recommends that an importing country take into account the prevalence of disease in the exporting country when assessing risk of release. Could Australia please explain how the IRA meets the OIE Code?

B. Inconsistencies in Methodology

We are also concerned about inconsistent application of Australia's own risk assessment standards throughout the document. According to the IRA methodology, disease agents with an overall risk estimation of "very low" or "negligible" were considered to achieve Australia's conservative appropriate level of protection (ALOP) and further risk management was not required (Chapter 3.2.7). As an example, the risk assessment concludes that the unrestricted risk for both Borna disease (Chapter 5.4.2) and West Nile fever (Chapter 5.38.2) is negligible. Thus, Australia's ALOP is achieved for both diseases and further risk management was not required. Despite this

conclusion, the IRA recommends certification of country freedom from Borna disease and certification of country freedom or vaccination for West Nile fever. These import requirements not only contradict Australia's own methodology but also OIE Code Article 5.1.2 which states:

> *The international veterinary certificate should not include measures against pathogens or diseases which are not OIE listed, unless the importing country has demonstrated through import risk analysis, carried out in accordance with Section 2., that the pathogen or disease poses a significant risk to the importing country.*

In addition, OIE code recommends that import restrictions not be placed on dead-end hosts for West Nile virus (such as horses).

Based on the evidence provided, and Australia's own conclusions, the recommended import requirements for the two diseases mentioned above do not appear to be warranted. Without sufficient evidence of "significant risk" of disease through the import of horses, it appears that Australia has imposed import mitigations despite the IRA conclusions of negligible risk. While the United States is able to certify freedom from Borna disease and agrees with the assertion that West Nile vaccination is routine in endemic areas, such inconsistencies suggest that the import risk methodology is flawed, and represent a deviation from OIE Code. Could Australia please explain why diseases identified in the IRA as negligible risk still require import mitigation measures, and how these requirements are consistent with the OIE Code?

C. Flawed Assumptions

The release assessment for each disease considered a single scenario, in which the horses entering Australia were sourced at random from the general horse population in an approved country. This assumption leads to an inflated estimate of risk of release. As acknowledged by Australia in Chapter 2.3.3, due to the commitment of time and money required to export a horse, animals selected for export are generally of very high economic or sentimental value. These horses could reasonably be expected to be of better health status than the general horse population. In addition, as previously mentioned, this assumption does not account for differences in disease incidence and prevalence between approved countries.

As stated in Chapter 3.2.5, the risk of release and exposure was "the estimated likelihood that there was at least one exposure event during an average year for the expected number of horses imported from countries where the disease being assessed was endemic." The risk of one exposure event occurring is proportional to the number of horses imported, and since the number of horses arriving in Australia from each approved country is quite different, considering the volume from each approved country would provide a more appropriate estimate of risk, as well as allowing for consideration of disease prevalence in the approved country.

8. Proposed Quarantine Measures for Importation of Horses

8.1.1 Documentation: We request removal of the requirement to include laboratory reports with the export certificate. As the competent veterinary authority of the United States, it is the responsibility of the U.S. Department of Agriculture to officially attest to laboratory test results.

8.1.3 Certification before export

Contagious equine metritis: We suggest that the sampling sites for colts and stallions should include the urethral sinus which is most frequently associated with persistence of *Taylorella equigenitalis* and *T. asinigenitalis* in the male equid.

Equine influenza: We request that the time period for taking the second nasopharyngeal swab for conducting the polymerase chain reaction (PCR) test for equine influenza be extended to 7 days. Four days prior to export is not sufficient to transport specimens to an appropriate laboratory for PCR testing, conduct the test, and report the result.

Equine piroplasmosis: As both the indirect fluorescent antibody test (IFAT) and the competitive enzyme-linked immunosorbent assay (cELISA) are recognized by the OIE as prescribed tests for international trade, we recommend that Australia accepts the use of either test in screening imported horses for evidence of *Babesia caballi* and *Theileria equi* infection rather than restrict the testing method to the IFAT.

Equine viral arteritis (EVA): We question the scientific rationale for testing colts or stallions between six and nine months of age on two occasions with vaccination against EVA immediately after the second test. We contend that a single blood sample taken at the time of vaccination would be sufficient to determine the serological status of individual colts at time of vaccination. Since it has been shown that pre-pubertal colts are refractive to establishment of the carrier state, there would be no increased risk to the importing country by reducing the blood sampling to one taken at time of initial vaccination. This proposal was submitted to the OIE Code Commission with the endorsement of three OIE-designated EVA specialists.

The United States thanks the government of Australia for the opportunity to review and comment on the draft IRA. We appreciate your consideration of our comments and hope that our recommendations are taken favorably into consideration.

END U.S. COMMENTS

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