



Department of
**AGRICULTURE
FISHERIES &
FORESTRY -
AUSTRALIA**



18 December 2002

ANIMAL BIOSECURITY POLICY MEMORANDUM 2002/51

IMPORTATION OF SPECIFIC PATHOGEN FREE (SPF) EGGS: ADVICE ON PROCESS FOR REVIEWING POLICY

This Animal Biosecurity Policy Memorandum (ABPM) notifies stakeholders of the decision by Biosecurity Australia to conduct a review, that will be subject to public consultation, for the development of quarantine policy for the routine importation of Specific Pathogen Free (SPF) eggs for vaccine production and other uses.

ABPM 2002/38 of 12 August 2002 provided stakeholders with a discussion paper that set out the need for quarantine conditions for the routine importation of SPF eggs for vaccine production and other uses. It also asked for comment on the approach, ie whether a review or an Import Risk Analysis (IRA) should be conducted. Both approaches involve considerable stakeholder consultation, with the IRA process taking a considerably longer time. Stakeholder views were divided – a summary of responses is attached.

Since the release of ABPM 2002/38, the situation has changed. The recent Newcastle disease outbreaks are likely to lead to an even greater demand for SPF eggs, especially if a widespread or national vaccination campaign is undertaken.

In view of the stakeholder responses and the above issues, Biosecurity Australia has decided to undertake a review. The process will be as follows:

1. Biosecurity Australia will review and redraft the existing contingency SPF egg policy and requirements for imported avian vaccines in relation to SPF flocks and eggs, taking into consideration:
 - current quarantine policies on veterinary vaccines;
 - current quarantine policies on hatching eggs;
 - current National Registration Authority (NRA) requirements for avian vaccines and SPF flocks;
 - international requirements (eg Eu.Pharm, 9CFRs, EU Directives); and
 - relevant technical issues identified by current IRAs (ie the generic IRAs of uncooked chicken meat and non-viable eggs and products containing egg).
2. External review of the draft amended policy by
 - a) the risk analysis panels on the uncooked chicken meat and on non-viable eggs and egg products IRAs, and
 - b) participants from the February 2002 meeting on SPF eggs.

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3. Draft policy released for public consultation.
4. Document revised and finalised by Biosecurity Australia, taking into consideration relevant comment from stakeholders.

Biosecurity Australia will endeavour to fast-track the above process. Comment periods for the external review and public consultation will be limited to a 30-day period.

The import requirements for veterinary vaccines relating to overseas SPF flocks and eggs will also be reviewed to ensure consistent application of import policy.

Next steps

Biosecurity Australia will release a draft policy as soon as possible for stakeholder comment.

Please pass this notice to other interested parties. If those parties wish to be included in future communications on this matter they should get in touch with the contact officer (details below).

Confidentiality

Respondents are advised that, subject to the *Freedom of Information Act 1982* and the *Privacy Act 1988*, all submissions received in response to Animal Biosecurity Policy Memoranda will be publicly available and may be listed or referred to in any papers or reports prepared on the subject matter of the Memoranda.

The Commonwealth reserves the right to reveal the identity of a respondent unless a request for anonymity accompanies the submission. Where a request for anonymity does not accompany the submission the respondent will be taken to have consented to the disclosure of his or her identity for the purposes of Information Privacy Principle 11 of the Privacy Act.

The contents of the submission will not be treated as confidential unless they are marked 'confidential' and they are capable of being classified as such in accordance with the Freedom of Information Act.

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Responses to ABPM 2002/38
Development of policy for the importation of SPF eggs

Simon Robinson (Fort Dodge)	Internal review as it is expedient and provides the same level of scrutiny; and the poultry industry is concentrated in Australia and relevant technical input would be achieved by consultation with the expert risk analysis panels.
Tony Barnett (SA Dept Ag)	Internal review.
Paul Gilchrist	Internal review as SPF eggs are dealt with in a situation that is an acceptably low risk; there is a need for expediency because of the possibility of a sudden demand/supply change; Australia already allows imports of fertile eggs; and the opportunity to use existing expertise ie egg and chicken meat IRAs.
Margaret MacKenzie (Inghams)	Internal review.
Leigh Nind (NRA)	IRA as the NRA considers the current contingency policy is not fully WTO/SPS compliant. Also provided many valuable suggestions on matters to be considered as part of a review.
Graham Murray (SPAFAS)	IRA as due consideration is needed for policies of SPF eggs for general use. Acknowledges existing contingency policy is satisfactory. A revised contingency policy may provide immediate relief in some circumstances. Use of non-Australian SPF eggs in imported vaccines should also be reviewed. Global demand for SPF eggs will increase, including from Australia and non-traditional users. Australia could contribute to meeting this demand: SPAFAS can supply current and future demands of SPF eggs with commercial forward planning. If there were unforeseen immediate changes in demand/supply then importation would be warranted but must meet all AQIS requirements. Should importation occur, it is probable that the supply of Australian SPF eggs will be compromised and commercial viability of SPAFAS potentially called into question.
Richard Bevan	Internal review. Provided many valuable suggestions on matters to be considered as part of a review.
Larry Ward (Virax Holdings)	IRA to provide greatest opportunity for all stakeholders to provide input and assess potential impact of proposed changes. Critical dependence on supply of SPF eggs. Failure to access eggs on a regular basis would inhibit or stop biotechnology development programs. While a small user, requires reliable and timely supply of eggs, ie needs a local supplier. Because of cost and logistical reasons, importation from large overseas suppliers would be impractical for small companies.
Penny Cain (AQIS)	No comment on review/IRA processes. No major comments, a few points on supply and demand issues and imbalances. Also refers to notifications of 2 breakdowns of SPF facilities in the USA in recent months and that US facilities may not be routinely inspected by authorities.
Rod Andrewartha (DPIWE Tasmania)	IRA as there are major changes proposed and it is a complex issue.

David Tinworth (Bioproperties)	<p>Internal review with a reduced time frame as this is a workable solution for formulating policy and procedures with stakeholders. With the longer timeframe of an IRA, significant damage could be done through egg shortages before the IRA is completed.</p> <p>Concerned that there is an unacceptably high level of uncertainty in the supply of SPF eggs. An outbreak in the only remaining facility may eliminate supply for up to 12 months. Current Newcastle disease outbreaks will increase demand.</p> <p>Industry and government must work together to achieve process of orderly importation of SPF eggs to supplement Australian production.</p> <p>Also provided many valuable suggestions on matters to be considered as part of a review.</p>
Brian Radunz (NT CVO)	<p>IRA as the full range of stakeholders will be involved; the contingency clause could be invoked for short-term supply problems; and the need to fully cover unacceptable quarantine risks due to the potential widespread implications if contaminated eggs imported.</p>