



30 May 2018

BIOSECURITY ADVICE 2018/10

NEW IMPORT CONDITIONS FOR BREADED, BATTERED AND CRUMBED PRAWNS IMPORTED FOR HUMAN CONSUMPTION

This Biosecurity Advice notifies stakeholders that, pending consideration of comments received during the comment period, new import conditions for breaded, battered and crumbed (BBC) prawns imported for human consumption will be implemented on 28 September 2018 in order to facilitate safe trade while achieving Australia's appropriate level of protection (ALOP).

The new import conditions for BBC prawns are outlined in the attached '*Biosecurity requirements for the importation of prawns and prawn products for human consumption*' ([Attachment A – Sections 2.2-2.3](#)).

From 28 September 2018, BBC prawns arriving in Australia must have undergone a par-cooking step during processing to ensure the bread, batter or crumb coatings have set into a solid form such that the coating remains fully adhered to the prawn in the frozen and thawed state. If competent authorities in the exporting country are unable to attest that BBC prawns have been par-cooked, the prawn products must be managed as per Australia's import conditions for uncooked prawns which requires pre-export and on-arrival disease testing based on sampling and testing methods recognised by the World Organisation for Animal Health (OIE).

Competent authorities and existing permit holders will be contacted by the department regarding implementation, including transitional arrangements for product in transit, for these new import conditions.

Comments on the new import conditions for BBC prawns can be provided to Animal Biosecurity until 29 June 2018 and should be directed to:

Animal Biosecurity
Department of Agriculture and Water Resources
GPO Box 858
CANBERRA ACT 2601

Email: AquaticAB@agriculture.gov.au

The new import conditions for BBC prawns are required to manage the risks associated with the increased volume of BBC products imported since implementation of the suspension of uncooked prawns in January 2017. The increased volume also increases the associated risks for product diversion to unintended end-uses such as washing for sale as uncooked product, fishing bait or berley, or feed for aquatic animals. The revised BBC import conditions will ensure that the import of BBC prawns can continue while achieving Australia's ALOP.

Pending consideration of comments received during the comment period, BBC prawns arriving in Australia from 28 September 2018 must be certified by the competent authority to have undergone a

par-cooking step (for example, pre-frying¹ or baking) during processing to solidify and adhere the coating to the prawn. BBC prawns will continue to be subject to 100 per cent seals intact inspection on-arrival in Australia. Only those prawns that are verified to have undergone acceptable par-cooking and that meet all other requirements for BBC will be released from biosecurity control.

If countries are unable to attest to a par-cooking step for BBC prawns, then Australia's uncooked prawn conditions will apply. The uncooked prawn conditions require pre-export sampling and testing to be conducted post-processing and prior to export to Australia. Only prawns that have been tested and found to be free of white spot syndrome virus (WSSV) and yellow head virus genotype 1 (YHV1) based on sampling and testing methods recognised by the OIE can be exported to Australia. The uncooked prawns will be subject to 100 per cent secure seals intact inspection on-arrival and testing for WSSV and YHV1 in Australia. Only those batches that test negative for both viruses will be released from biosecurity control.

The current import conditions for uncooked prawns and new import conditions for BBC prawns will remain in place while Australia undertakes the review of the biosecurity risks of, and import conditions for, prawns and prawn products imported for human consumption as announced by Australia's Director of Biosecurity on 16 May 2017 (Biosecurity Advice 2017/07; agriculture.gov.au/biosecurity/risk-analysis/memos/ba2017-07).

Australia has issued a Sanitary and Phytosanitary (SPS) Notification to the World Trade Organization (WTO) SPS Committee to inform its trading partners of the new import conditions for BBC prawns, including a link to Australia's updated model health certificate.

This Biosecurity Advice is available via the department's website: agriculture.gov.au/biosecurity/risk-analysis/memos. Please pass this notice to other interested parties.

The department's prawn import policy team is the first point of contact and can be contacted as follows:

Email: AquaticAB@agriculture.gov.au

Yours sincerely



Dr Carol Sheridan
A/g Assistant Secretary
Animal Biosecurity

¹ The Codex definition of pre-frying is: "*Frying of breaded and battered fishery products in an oil bath in such a way that the core remains frozen*" (Codex Alimentarius, Code of practice for fish and fishery products, CAC/RCP 52-2003, fao.org/fao-who-codexalimentarius/codex-texts/codes-of-practice/en/).



BIOSECURITY REQUIREMENTS FOR THE IMPORTATION OF PRAWNS AND PRAWN PRODUCTS FOR HUMAN CONSUMPTION

28 September 2018

The following import conditions will apply to the importation of prawns and prawn products for human consumption (other than shelf-stable prawn-based food products¹) from 28 September 2018. These import conditions are issued under the authority of the *Biosecurity Act 2015*.

NOTE: Imported food, including prawns and prawn products must comply with the *Imported Food Control Act 1992* and the *Australia New Zealand Food Standards Code* (FSC) in its entirety. Under the *Imported Food Control Act 1992*, the Department of Agriculture and Water Resources may inspect, or inspect and analyse imported prawns and prawn products to determine compliance with the FSC. These food safety and labelling requirements are separate from, and additional to, Australia's biosecurity requirements. Information on the FSC may be obtained from Food Standards Australia New Zealand².

1. IMPORT PERMIT

The importer must obtain a permit to import all *uncooked* prawns and prawn products into Australia for human consumption from the Department of Agriculture and Water Resources (the department), before the goods are imported.

The application to import must include:

- the name and address of the importer and exporter; and
- a description of the commodity to be imported.

The application will be assessed on the above information as well as any other criteria deemed relevant by the Delegate of the Director of Biosecurity.

Cooked prawns and prawn products do not require an import permit but will be required to meet conditions that are specified in the *Biosecurity (Prohibited and Conditionally Non-prohibited Goods) Determination 2016*. These conditions specify that the *cooked* prawns are accompanied by a certificate from a body listed in the List of Overseas Authorities—Aquatic Animals for Import (also known as a competent authority (CA)).

For further information on import permits see Australia's Biosecurity Import Conditions database (BICON): bicon.agriculture.gov.au/BiconWeb4.0

2. IMPORT CONDITIONS – UNCOOKED PRAWNS IMPORTED FOR HUMAN CONSUMPTION

Uncooked (raw) prawns may be imported into Australia under the following conditions:

2.1. Uncooked prawns

Description: Uncooked prawns are prawns which have had the head and shell removed (the last shell segment and tail fans permitted) and may be marinated prawns, or Australian prawns processed overseas in facilities which have not been assessed and approved by the department through an official evaluation of the exporting country's CA.

All imported prawns must be free from both WSSV and YHV1.

¹ Shelf-stable prawn-based food products include dried prawns, canned prawns or condiments containing prawns as an ingredient (e.g. prawn balachan, shrimp paste).

² Available at: foodstandards.gov.au.

The CA in the exporting country must certify on an official government health certificate that the uncooked prawns:

- a) are frozen and have had the head and shell removed (the last shell segment and tail fans permitted);
- b) product from each batch has been found post-processing to be free of WSSV and YHV1 based on a sampling and testing method recognised by the World Organisation for Animal Health (OIE) for demonstrating absence of disease;
- c) have been inspected and graded in a premises approved by and under the control of the CA;
- d) are free from visible signs of infectious diseases;
- e) are fit for human consumption;
- f) each package is marked with the words "*for human consumption only-not to be used as bait or feed for aquatic animals*".

On arrival in Australia each batch of uncooked prawns will be subject to seals intact inspection and testing for WSSV and YHV1 at an approved screening laboratory.

2.2. Highly processed prawns

Description: Uncooked highly processed prawns are prawns which have had the head and shell removed (the last shell segment and tail fans permitted) and the raw prawn meat is processed into dumpling, spring roll, samosa, roll, ball or dim sum-type product.

The CA in the exporting country must certify on an official government health certificate that the uncooked highly processed prawns or prawn products:

- a) have been processed, inspected and graded in premises approved by and under the control of the CA;
- b) are free from visible signs of infectious diseases.

2.3. Breaded, battered and crumbed prawns

Description: Breaded, battered and crumbed prawns are prawns which have had the head and shell removed (the last shell segment and tail fans permitted), are coated for human consumption by being breaded (crumbed) or battered and have undergone a par-cooking step during processing.

Par-cooking definition: A processing step involving the application of heat (for example, pre-frying, baking) to ensure the coating is set into a solid form and fully adheres to frozen and thawed prawns.

The CA in the exporting country must certify on an official government health certificate that:

- a) the breaded, battered and crumbed prawns have been processed, inspected and graded in premises approved by and under the control of the CA;
- b) the prawns are free from visible signs of infectious diseases prior to coating;
- c) the breaded, battered and crumbed prawns have undergone a par-cooking step to solidify and adhere the coating to the prawn (for example, pre-frying³, or baking) during processing.

Note – prawn products that do not meet all the import conditions outlined above for BBC prawns will be subject to the import conditions for 'Uncooked prawns' (see **Section 2.1** above)

³ The Codex definition of pre-frying is: "*Frying of breaded and battered fishery products in an oil bath in such a way that the core remains frozen*" (Codex Alimentarius, Code of practice for fish and fishery products, CAC/RCP 52-2003, fao.org/fao-who-codexalimentarius/codex-texts/codes-of-practice/en/).

2.4. Sourced from a country, zone or compartment that is recognised by Australia to be free of pathogenic agents of biosecurity concern

Description: Prawns sourced from disease free countries, zones or compartments may be exported to Australia as whole prawns, partially peeled, peeled or highly processed. To recognise this condition, the department would need to undertake an evaluation of the exporting country's CA to approve the trade.

If assessed and approved by the department, the CA in the exporting country must certify on an official government health certificate that the prawns or prawn products:

- a) have been sourced from {insert country} which is free from the following pathogenic agents;
 - i) white spot syndrome virus (WSSV)
 - ii) yellow head virus genotype 1 (YHV1)
 - iii) Taura syndrome virus

(**AND** if the product is not frozen i.e. the product is chilled)

 - iv) necrotising hepatopancreatitis bacterium (NHPB).
- b) have been processed, inspected and graded in premises approved by and under the control of the CA;
- c) are free from visible signs of infectious diseases;
- d) each package is marked with the words *"for human consumption only-not to be used as bait or feed for aquatic animals"*.

2.5. Uncooked wild-caught prawns of Australian origin processed overseas in approved premises

Description: Uncooked wild-caught prawns of Australian origin must have been processed at a CA approved establishment, in accordance with the agreed biosecurity integrity program. For example, Thai Union Frozen Products Public Company Ltd has been approved by both the department and Thailand's CA to process Australian prawns for export to Australia.

If assessed and approved by the department, the CA in the exporting country must certify on an official government health certificate that the uncooked prawns:

- a) are wild caught prawns of Australian origin, processed at a CA-approved establishment in accordance with the biosecurity integrity program agreed with the Australian Government Department of Agriculture and Water Resources.
- b) each package is marked with the words *"for human consumption only-not to be used as bait or feed for aquatic animals"*.

On arrival in Australia each batch of uncooked prawns will be subject to seals intact inspection and testing for WSSV and YHV1 at an approved screening laboratory.

3. IMPORT CONDITIONS – COOKED PRAWNS IMPORTED FOR HUMAN CONSUMPTION

Cooked prawns may be imported into Australia under the following conditions.

3.1. Cooked prawns

Description: Minimum cooking times and temperatures are not specified for cooked prawns, however the CA must be able to certify that all the protein in the prawn meat has coagulated and no raw prawn meat remains. An example of a cooking time considered necessary to achieve coagulation of proteins in prawns and prawn products is cooking prawns to a minimum 70°C core temperature for at least 11 seconds.

The CA in the exporting country must certify on an official government health certificate that the cooked prawns:

- a) have been cooked in premises approved by and under the control of the CA and as a result of the cooking process, all the protein in the prawn meat has coagulated and no raw prawn meat remains.
- b) are fit for human consumption.

4. VERIFICATION OF IMPORT CONDITIONS

NOTE: Imported food, including prawns and prawn products must comply with the *Imported Food Control Act 1992* and the *Australia New Zealand Food Standards Code (FSC)* in its entirety. Under the *Imported Food Control Act 1992*, the Department of Agriculture and Water Resources may inspect, or inspect and analyse imported prawns and prawn products to determine compliance with the FSC. These food safety and labelling requirements are separate from, and additional to, Australia's biosecurity requirements. Information on the FSC may be obtained from Food Standards Australia New Zealand.

On-arrival in Australia, consignments of prawns will be verified through inspections and/or testing.

Uncooked prawns and prawn products are inspected by the department to ensure that the imported commodity and documentation complies with the import permit conditions. Secure seals intact inspections and an appropriate level of on-arrival verification testing will be applied to consignments of uncooked prawns.

Cooked prawns will be inspected by the department on a random basis to ensure compliance with biosecurity attestations required on government health certificates.

4.1. Verification testing

The testing used in approved laboratories will be based on the polymerase chain reaction tests in the current version of the *OIE Manual of Diagnostic Tests for Aquatic Animals* or equivalent, and a sampling regimen that would provide 95 per cent confidence of detecting the agent if present at 5 per cent prevalence.

All consignments of prawns to be tested on-arrival in Australia will be sampled through secure seals intact inspections, and held under biosecurity control until the results of the tests are available. Testing will be applied to each batch of uncooked prawns. Batches that return positive results must be re-exported, destroyed or further processed (i.e. cooked) in a facility approved by the Department of Agriculture and Water Resources for that purpose.

5. BATCH DEFINITION

For the purposes of testing prawns for disease agents of biosecurity concern, a batch may be defined by one of the following (to be determined by the CA), but in any case, a batch cannot exceed 1 shipping container.

- product from a single line in a single processing run
- product harvested from a single aquaculture pond - (i.e. 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;

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.

Documentation from the exporter, supplier or the CA verifying the number of batches in the consignment must be provided to the Department of Agriculture and Water Resources. This documentation must clearly detail the labelling of each batch in the consignment. If the number of batches cannot be determined from documentation, full unpacking and inspection may be required in order to determine the number of batches. This may result in additional testing and inspection costs.

If uncooked prawns are sourced from a country, zone or compartment recognised by Australia to be free of disease, batch-testing for disease agents of biosecurity concern pre-export and on-arrival in Australia is not an import requirement. However, verification activities may be implemented at the border to provide Australia with ongoing assurances that trade in uncooked prawns aligns with Australia's appropriate level of protection⁴ (ALOP). Verification may include an appropriate level of on-arrival testing at a rate considered appropriate by the department.

6. REVIEW

Import conditions may be reviewed if there are any changes in the source country's import policy or its animal disease status, or at any time at the discretion of the Director of Biosecurity.

⁴ Australia's ALOP is expressed as providing a high level of sanitary and phytosanitary protection aimed at reducing risk to a very low level, but not to zero

