



MINISTRY OF AGRICULTURE AND RURAL DEVELOPMENT OF VIETNAM  
National Agro-Forestry-Fisheries Quality Assurance Department (NAFIQAD)

NAFIQAD

Ref. No. 1293/QLCL-CL1

Hanoi, 25<sup>th</sup> June 2018

Animal Biosecurity

Australian Department of Agriculture and Water Resources.

Dear Sir/Madam,

Via Australian Embassy in Vietnam, the National Agro-Forestry-Fisheries Quality Assurance Department (NAFIQAD) received Biosecurity Advice 2018-10 and Biosecurity Advice 2018-11 informing new import conditions for breaded, battered and crumbed prawns imported for human consumption and inviting submissions of comments on specific issues with Australia's current prawn import conditions. On reviewing Australian requirements, NAFIQAD would like to express as follows:

1. Farmed prawns and wild-caught ones are subject to the same import conditions. Wherease, susceptible diseases and likelihood of exposure of these species are different. Therefore, Australia is kindly requested to consider imposition of different import conditions on farmed prawns and wild-cautht ones.
2. The Generic Import Risk Analysis Report for Prawns and Prawn Products released in 2009 (IRA) defined that uncooked prawns that have been marinated, coated (e.g. breaded prawns) would reduce the likelihood of exposure if being used for human consumption and classify them as uncooked highly processed prawns. Australian competent authorities are responsible for post-arrival food inspection and monitoring to prevent illegal use of imported prawns as recreational fishing bait, aquatic feed. It is recommended that Australia should intensify the post-arrival control instead of imposing more stringent control measures on imported shipments. Thus, we kindly request Australia to classify marinated, breaded prawns as uncooked highly processed ones as previously done.
3. The prawn disease status and control is different upon each country therefore it is impossible to apply a common risk analysis measure for prawns imported from different countries. That is why Australia should carry out independent risk assessment for prawns imported from each country in order to set up the appropriate risk management measures for each exporting country.

Thank you for your cooperation./.

Yours sincerely, 