

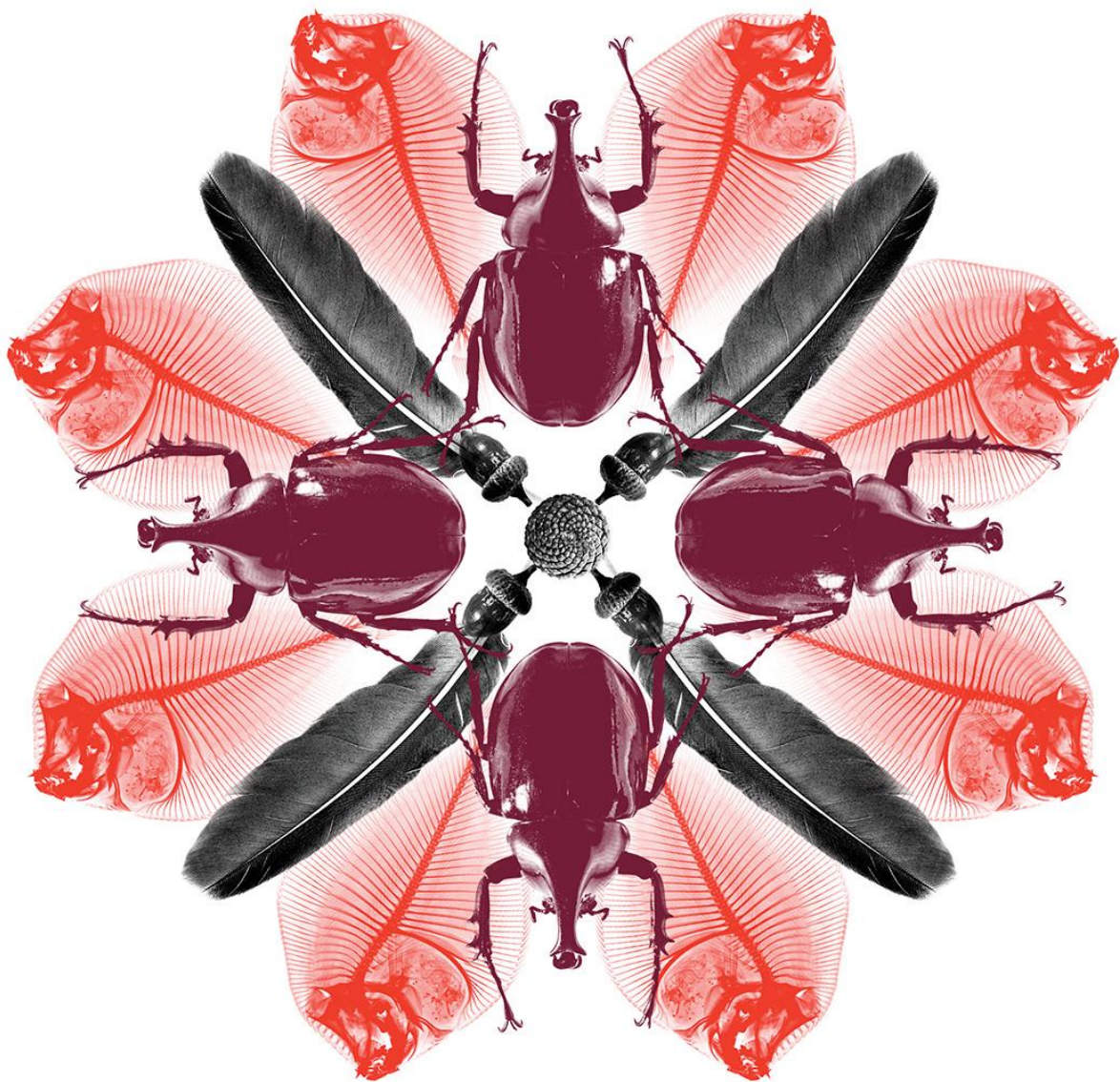


Australian Government
Department of Agriculture
and Water Resources

Review of the biosecurity risks of, and import conditions for, prawns and prawn products imported for human consumption

Roundtable discussion 8 February 2018
Meeting Summary Report

March 2018



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Acronyms and abbreviations

Term or abbreviation	Definition
ALOP	Appropriate level of protection
BA	Biosecurity Advice
BIRA	Biosecurity import risk analysis
DAWR	Department of Agriculture and Water Resources
IRA	Import risk analysis
NSW	New South Wales
NT	Northern Territory
OIE	World Organisation for Animal Health
Qld.	Queensland
SA	South Australia
SPS Agreement	WTO Agreement on the application of sanitary and phytosanitary measures
Tas.	Tasmania
Vic.	Victoria
WSD	White spot disease
WTO	World Trade Organization

Summary

Animal Biosecurity hosted a roundtable discussion in Canberra with stakeholders (domestic, industry, State and Territory government representatives and representatives from Australia's major prawn trading partners, refer Appendix A. List of attendees) on 8 February 2018 about the *Review of the biosecurity risks of, and import conditions for, prawns and prawn products imported for human consumption* (the review).

The purpose of the roundtable was to provide stakeholders with an opportunity to discuss the risk analysis and future direction of the review, ask questions, hear differing views and voice any concerns they may have about the review process.

The format of the roundtable included a departmental presentation, industry presentations by the Australian Council of Prawn Fisheries, Australian Prawn Farmers Association and the Seafood Importers Association of Australasia, followed by a roundtable discussion that covered key areas of interest as raised by attendees through a pre-roundtable questionnaire (refer Appendix B. Questionnaire to inform the roundtable agenda). Seafood Industry Australia, a newly formed national peak body which represents the Australian seafood industry as a whole, also outlined their views on the review and future engagement with the department. Issues other than the review raised by stakeholders in the questionnaire, will be followed-up by the department. The roundtable agenda can be found at Appendix C. Final Agenda.

The roundtable established a base for communication and consultation with stakeholders and outlined stakeholder expectations for the review.

Stakeholders noted that regular and transparent communication was essential during the review process and that they were looking forward to working with Animal Biosecurity and being part of the review process.

Opening statement

The opening statement was made by Mr Tim Chapman, First Assistant Secretary, Biosecurity Animal Division, Department of Agriculture and Water Resources, where he stated that the roundtable discussion on prawns was about the *Review of the biosecurity risks of, and import conditions for, prawns and prawn products imported for human consumption*.

Mr Chapman discussed the purpose of the roundtable which was to gather domestic, government and international stakeholders to discuss the review.

Mr Chapman stated that the roundtable was intended to be a forward-focussed discussion, where the department outlined the process for conducting a risk analysis, including mechanisms for consultation with interested parties, and stakeholders had the opportunity to ask questions and express their views.

Mr Chapman went on to state that the roundtable was the first formal consultation activity for the review and that further formal consultation activities are planned throughout the review process. Mr Chapman also encouraged stakeholders to contact the department whenever they wished to discuss the review outside of a formal consultation process.

Roundtable presentations

The roundtable included a departmental presentation and industry presentations by the Australian Council of Prawn Fisheries (ACPF), Australian Prawn Farmers Association (APFA) and Seafood Importers Association of Australasia (SIAA).

1.1 Presentation by the Department of Agriculture and Water Resources

The presentation by the department provided information about Australia's biosecurity risk management framework, international obligations for establishing risk management measures, the risk analysis process, next steps after the roundtable (Appendix D. Next steps) and the consultation activities that are planned during the review (Appendix E. Consultation activities). A copy of the department's presentation is available on request through the Prawn Review Liaison Officer who can be contacted via email: prawnreview@agriculture.gov.au.

1.2 Presentations by industry

Industry presentations provided an overview of each industry and outlined their priorities and expectations regarding the review.

1.2.1 Australian Council of Prawn Fisheries

The presentation by the ACPF provided an outline of the organisation and the wild catch prawn sector. ACPF shared its mission: to support members in the responsible sustainable production of high quality prawns from healthy productive marine ecosystems; to provide safe, high quality prawn products to consumers; and to be a professional, cooperative and profitable industry, respected and valued by the Australian community.

ACPF's presentation provided data on the value (GVP) of Australian wild catch sector, which was \$301.5M/19,751 tonnes and approximately 500 boats during 2016. The presentation also expressed ACPF's goals and strategies: an effective and targeted national promotion of Australian wild catch prawns to consumers through the *Love Australian prawns* campaign, and research & development investment.

ACPF communicated that its expectations of the review are a robust, transparent and inclusive process with clear consultation points and timelines. ACPF also expects a revised biosecurity regime and implementation protocols that are risk-management based, can be properly funded, resourced and enforced, are not prone to loopholes, protect Australia's waterways and fisheries from the risk of exotic diseases, and are responsive to new and emerging risks.

1.2.2 Australian Prawn Farmers Association

The presentation by the APFA first provided an outline of the association and industry they represent, a prawn aquaculture industry of a total \$86.4M/4,682 tonnes during 2015-16 and which provide more than 300 direct jobs (mostly regional). APFA also outlined the 5 year projected growth (based on already approved expansion by government) estimating value at \$500M and providing approximately 1,500 direct regional jobs.

APFA's presentation also provided an overview of the activities carried out by prawn farmers to protect the industry and environment, and included translocation protocols to test wild-caught broodstock, regulation and treatment of prawn feed, and general biosecurity obligations. In addition, after the white spot disease (WSD) outbreak, further on-farm biosecurity measures have been voluntarily implemented.

During the presentation, APFA expressed their view that infected imported raw prawns entering Australia poses the highest risk and ideally should be cooked. APFA also highlighted the ease by which imported infected prawns are exposed to Australia's waterways. APFA stated that it is important to recognise the emphasis on free trade between countries but that it must be balanced with the appropriate level of protection (ALOP) against disease and antimicrobials for Australia. APFA noted they are not against imported prawns and their aim is to reduce the biosecurity risk posed to the prawn aquaculture industry by working collaboratively with government, relevant departments and other impacted parties such as the wild catch sector and SIAA.

1.2.3 Seafood Importers Association of Australasia

The presentation by the SIAA first provided an outline of the seafood import sector, which supplies 70-80 per cent of Australian seafood consumption and generates about \$5 billion in revenue for Australian businesses. The presentation also outlined SIAA's goals, which included to ensure safe, responsibly sourced and affordable seafood for all Australians, to advance good practices in the import sector, and to secure Australia's long-term trade channels and access to global seafood supply.

SIAA expressed that its expectations of the review are a reasonable balance between border controls and other risk mitigation, addressing all probable pathways, and the most cost-effective import conditions relevant to risk and mitigation potential across the whole biosecurity continuum. SIAA also expects import conditions and inspections that are matched by sufficient departmental resources to meet service delivery standards.

Facilitated discussion session

The facilitated discussion session covered key areas of interest which were raised by stakeholders in response to the questionnaire which was sent out before the roundtable. These topics included: international obligations, risk analysis methodology and consultation.

During the facilitated discussion session, stakeholders also had the opportunity to ask questions and discuss issues relating to the review.

The department responded to queries and provided clarification as necessary.

A summary of questions and responses is provided below.

Questions	Responses
What are the next steps after the roundtable?	<p>The next step is the release of a Biosecurity Advice (BA) notice requesting submissions on specific issues that stakeholders have with Australia's current prawn import policy. This is a formal consultation with stakeholders.</p> <p>Ongoing consultation at other times when stakeholders wish to discuss the review can be done through the prawn review team, which are the first point of contact or the prawn review liaison officer, who can be contacted via email: prawnreview@agriculture.gov.au.</p> <p>The department also has a stakeholder register. Stakeholders who wish to receive notifications and updates regarding the review should register on the department's website.</p> <p>Future roundtables will be organised on an as needs basis.</p> <p>Other formal consultation activities with stakeholders will include the request for stakeholder suggestions for members of the scientific advisory group (SAG) and the requests for stakeholder comment on the draft report.</p>
Can industry request a specific external expert to be consulted (acknowledging they must have experience in a relevant scientific field) during the review process?	<p>The department will use external resources and experts as necessary to undertake the review. As part of the consultation activities during the review, the department will request stakeholder suggestions for members of the SAG. Experts proposed by industry must be independent. The department cannot guarantee that experts proposed by stakeholders will be included as part of the SAG. During the review process, industry consultants will have an opportunity to express their views through the preparation of science-based submissions which will be considered by the department when conducting the review.</p>
How broad will this review be?	<p>This is a review of the biosecurity risks of, and import conditions for, prawns and prawn products imported for human consumption.</p> <p>Other disease pathways and vectors are out of scope (e.g. ballast water).</p> <p>Other aquatic species that may be affected by pathogens carried by imported prawns are considered during the impact analysis part of the review.</p>
What actions are being taken in other sectors of the seafood industry to review biosecurity risk assessments? What action is being taken in relation to pathways that are not fully understood and need to be considered?	<p>If the department becomes aware of potential risks or that the risk changes for a particular commodity, mechanisms are available to prioritise a review, and/or put conditions in place to manage the risk.</p>

Questions	Responses
What is the process for the identification of changing risks, and how do you perform ongoing scrutiny without having to perform a major review?	<p>Animal Biosecurity has ongoing media and scientific literature feeds about biosecurity issues for all animal species, those feeds are reviewed by technical experts and if an alarm is raised, the department will review the risk and / or take immediate action.</p> <p>Also, under the funding for the biosecurity white paper the department is conducting a review of the import conditions for all animal commodities, which allows the department to identify gaps, as well as streamline and tighten import conditions without having to conduct a formal review process over a number of years.</p>
During the review do you consider the cost associated with the eradication of an exotic disease?	The cost associated with the eradication of an exotic disease is considered in the consequence assessment part of the review.
What systems are used (and their accuracy) to verify correct labelling and trace-back systems?	<p>Animal Biosecurity is undertaking familiarisation visits to trading partners to discuss pre-border controls and better understand the systems in place to manage biosecurity risks for prawns exported to Australia.</p> <p>One possible outcome of the review is that Animal Biosecurity undertakes verification visits to major trading partners to confirm that the systems in the exporting country meet Australia's requirements, which may include aspects such as in-country controls and oversight of verification of labelling and trace-back mechanisms.</p> <p>Also, when import conditions are developed to manage biosecurity risks, Animal Biosecurity works with the operational areas to ensure that risk management measures are operationally viable and practical. Thereby reducing the risk that the measures are not applied as intended and reducing the opportunities for non-compliance and fraudulent activity.</p>
In relation to pathways across jurisdictions and management measures - How to manage the risk that recreational fishers will fish near inlet channels to aquaculture farms?	<p>There are clear jurisdictional responsibilities regarding managing biosecurity risks post-border. The review may provide recommendations to manage risk post-border which State and Territory jurisdictions will have a chance to comment on as part of the review process.</p> <p>State and Territory representatives added that Qld and NSW have some jurisdiction around fishing in channels near prawn farms.</p>
During a risk assessment how do you consider unintended end-use of an imported product?	<p>Unintended end-use is considered during the exposure assessment step of the risk assessment; including the key distribution pathways and end-uses of imported prawns are considered. The end-uses considered are not just the intended end-use, but also how susceptible populations may be exposed to the commodity through unintended end-uses.</p> <p>When unintended end-uses are considered as risks in the risk assessment, risk management measures may be put in place to reduce the risk, such as labelling requirements. For example, labelling of imported prawns "for human consumption only" and "not to be used as bait or feed for aquatic animals" is a risk management measure intended to reduce the likelihood of exposure of susceptible populations to imported prawns.</p> <p>Surveys conducted in 2002 and 2007 investigating the use of prawns, intended for human consumption, for bait and burley provided significant data inputs for the exposure assessment component in the Prawn IRA 2009. The use of prawns, intended for human consumption, as bait and burley was identified as a pathway for the potential introduction of pathogens and diseases they may carry into the Australian aquatic environment.</p> <p>The department is working to design a new bait and burley use survey, and its outputs will provide scientifically robust data in regards to unintended end-use, such as for recreational fishing bait for consideration during the review.</p>

Questions	Responses
How do you get around the current perception of the use of prawns 'for human consumption' as bait for recreational fishing in the new Bait and Burley Use Survey? As many education campaigns to alert fishermen to the risks of such practices had been done recently	<p>Animal Biosecurity is working with relevant experts to design a new bait and burley use survey. This includes the consultants from Kewagama research, who executed the 2002 and 2007 surveys, and the Australian Bureau of Agricultural and Resource Economics (ABARES).</p> <p>The potential bias in the survey responses as a result of recent education campaigns is an issue that must be carefully considered in the design of the survey.</p>
How will the IRA process become more responsive to changing risks?	<p>The department applies a process of risk review to the biosecurity risks associated with the importation of a commodity (animal product or live animal) for which current biosecurity measures exist.</p> <p>Risk review is recognised as an essential component of the risk analysis process. Each component of the risk analysis process (hazard identification, risk assessment and risk management) is reviewed and communicated under the risk review process.</p> <p>If a change in the biosecurity risk is identified based on updated scientific information, risk management measures may be revised accordingly.</p> <p>There are two main types of risk analyses used by the department:</p> <ul style="list-style-type: none"> • a biosecurity import risk analysis (BIRA) which is conducted through a regulated process provided for in the Biosecurity Act and the Biosecurity Regulation • a non-regulated risk analysis, such as scientific reviews of existing policy and import conditions <p>The review will be conducted as a non-regulated risk analysis of existing import conditions and policy and not as a legislated BIRA. This is because relevant risk management measures have already been established for prawns and prawn products. As for a BIRA, the OIE standards for risk analysis are applied including consulting with stakeholders, reviewing hazard identification and consequences. At present the hazard analysis is being conducted.</p>
Is it possible for stakeholders to have access to the draft for the Hazard identification?	Yes, once completed, the draft hazard identification table can be made available to stakeholders.
When reviewing the IRA, how do you deal with absence of information in relation to susceptible endemic crustaceans and native-populations?	<p>Animal Biosecurity will take into account current scientific information when completing the review. During the consultation process, stakeholders and scientists can let us know about new information. New scientific information can be provided to the department at any time, including after a risk analysis has been completed. Animal Biosecurity is open to receiving new scientific information. With respect to emerging diseases, under the WTO SPS agreement, Australia can only regulate pathogenic agents that could potentially produce adverse consequences and are not present in Australia, or if present, are associated with a notifiable disease, or are subject to control or eradication measures.</p>
How do you incorporate new and emerging diseases in the review process?	<p>The review will assess known pathogens of biosecurity concern that may be associated with imported prawns. The incorporation of new and emerging diseases depends on the extent of knowledge and impact.</p> <p>The department can commission research projects when required to fill critical information gaps.</p> <p>We have commissioned research in the past i.e. during the development of the Prawn IRA, the University of Arizona was commissioned to undertake research into the susceptibility of Australian species of prawns to Taura syndrome virus (TSV).</p> <p>These types of issues regarding unknowns can have significant impacts on the time-frames for completing risk analyses.</p> <p>The department also monitors international disease alerts and reports to keep up-to-date with emerging disease risks.</p>

Questions	Responses
Next steps for the review team immediately following the roundtable discussion	Animal Biosecurity will release a BA requesting science-based submissions on specific issues that stakeholders have with Australia's current prawn import policy. Animal Biosecurity indicated that the intended release date for the BA will be within the next 3 to 6 months ¹ . There will be a period of at least 60 calendar days for submissions to be made.

¹ Following feedback from stakeholders the department now intends to release the Biosecurity Advice in late-March 2018.

Appendix A. List of attendees

A total of 43 people attended the roundtable, attendees included domestic industry stakeholders (10), State and Territory government representatives (9) and representatives from our major trading partners Embassies in Canberra (8).

Amber Parr	Facilitator
Tim Chapman	DAWR - Biosecurity Animal Division
Carol Sheridan	DAWR - Biosecurity Animal Division
Jackie South	DAWR - Biosecurity Animal Division
Peter Stoutjesdijk	DAWR - Biosecurity Animal Division
Chris Starkey	DAWR - Biosecurity Animal Division
Scott Turner	DAWR - Biosecurity Animal Division
Steve Malone	DAWR - Biosecurity Animal Division
Kally Gross	DAWR - Biosecurity Animal Division
Alex Brazenor	DAWR - Biosecurity Animal Division
Yvonne Gonzalez-Cendales	DAWR - Biosecurity Animal Division
Sally Grimes	DAWR - Trade and Market Access Division
Leah Cuttriss	DAWR - Trade and Market Access Division
Alice Slevison	DAWR - Trade and Market Access Division
Matt Koval	DAWR - Biosecurity Policy Division
Naveen Bhatia	Office of Inspector-General of Biosecurity
Wayne Hutchinson	Fisheries Research and Development Corporation
Silke Speier	Department of Foreign Affairs and Trade
Daniel Sim	Department of Foreign Affairs and Trade
Matt West	Australian Prawn Farmers Association
Kim Hooper	Australian Prawn Farmers Association
Aaron Irving	National Aquaculture Council
Jane Lovell	Seafood Industry Australia
Annie Jarrett	Australian Council of Prawn Fisheries
Rachel King	Australian Council of Prawn Fisheries
Norman Grant	Seafood Importers Association of Australasia
Mark Boulter	Seafood Importers Association of Australasia
Marcel Jadouin	Food and Beverage Importers Association
Karen Dowd	Department Primary Industries and Regional Development, Western Australia
Juliet Corish	Department of Primary Industries, New South Wales
Michelle Rodan	Department of Primary Industry and Resources, Northern Territory
Allison Crook	Biosecurity Queensland
Pat Bell	Biosecurity Queensland
Shane Roberts	Department of Primary Industries and Regions South Australia
Viet Doan	Viet Nam Trade Office in Australia
Mutia Azura Mohamed	Consulate of Malaysia
Ahmad Suafiq Nazmi	Consulate of Malaysia

Krissana Sukhumpanich	Royal Thai Embassy
Kanokthip Wacharalekagool	Royal Thai Embassy
Farida Yasmeen	Bangladesh High Commission
Md. Sayfullah	Bangladesh High Commission
Rupjyoti Brahma Karjee	High Commission of India

Appendix B. Questionnaire to inform the roundtable agenda

Scope: the roundtable is an opportunity to discuss the risk analysis and future directions of the review. It is also an opportunity for stakeholders to ask questions, hear differing stakeholder views and voice any concerns they may have about the review.

1. Do you have any questions about the process the department uses to conduct reviews of biosecurity policy that you would like to discuss at the roundtable?

2. Please outline any key talking points/areas of interest you would like to see discussed at the roundtable.

a)

b)

c)

d)

e)

Appendix C. Final Agenda

Review of the biosecurity risks of, and import conditions for, prawns and prawn products imported for human consumption

Roundtable discussion

Department of Agriculture and Water Resources, Canberra, ACT

8 February 2018, 10 am–3 pm

- 10.00 am** Arrival, registration and morning tea
- 10.30 am** Welcome and house-keeping
- 10.40 am** Opening statement
- 10.50 am** Introduction of attendees
- 11.00 am** Department presentation and discussion
- 11.45 am** Industry presentations
- Australian Council of Prawn Fisheries
 - Australian Prawn Farmers Association
 - Seafood Importers Association of Australasia
- 12.30 pm** Lunch
- 1.15 pm** Facilitated discussion session
- International obligations
 - Risk analysis methodology
 - Consultation
- 2.50 pm** Wrap-up
- 3.00 pm** Close and afternoon tea

Appendix D. Next steps

Next steps after the roundtable:

- The department will release Biosecurity Advice requesting submissions on specific issues that stakeholders have with Australia's current prawn import policy:
 - Submissions should include a scientific basis for any proposed changes to Australia's prawn import policy.
 - There will be a period of at least 60 calendar days for submissions to be made.
 - All science-based submissions will be considered when preparing the draft report.
 - It is intended that this notice will be released on 26 March 2018.
- The department is working to design a bait and burley use survey with relevant experts, including the consultants who executed the 2002 and 2007 surveys and ABARES.
 - Since the 2002 and 2007 surveys were conducted it is likely that there have been changes in a number of factors that may affect the use of imported prawns as bait/burley, including changes in prices of local bait versus imported seafood, educational programs regarding bait use, fishing habits and advances in technologies.
 - Results from this survey will form an integral part for the assessment of exposure pathways during the review.
 - Results from the survey will also provide scientifically robust data for verification of certain risk management measures such as cooking and highly processing products.
 - These risk management measures were previously considered to significantly reduce the likelihood of imported prawns being diverted to use as bait, as crustacean broodstock feed, or being further processed in Australia.

Appendix E. Consultation activities

Stakeholders wishing to discuss the review can contact the department at any time via email: prawnreview@agriculture.gov.au.

Planned formal consultation activities during the review include:

- 1) Roundtable 1 – discussion of the review process (completed 8 February 2018)
- 2) Request for scientific submissions from stakeholders on specific issues with Australia’s current prawn import conditions for the department to consider when preparing the draft report
- 3) Request for stakeholder suggestions for members of the SAG
- 4) External peer review
- 5) Request for stakeholder comment on draft report
- 6) Roundtable 2
- 7) Roundtable 3 (if required).