No. 0521/ 7018

Department of Fisheries
Kaset Klang, Chatuchak,
Bangkok 10900, Thailand

2 July B.E. 2561 (2018)

Dear Dr Calrol Sheridan,

Re: Comments on Biosecurity Advice 2018/06

With reference to Biosecurity Advice 2018/06 notifying stakeholders, as part of the Department of Agriculture and Water Resources' review of the biosecurity risks of, and import conditions for, prawns and prawn products for providing comments by 04 June 2018 and then extend the closing date to 02 July 2018 in accordance with Biosecurity Advice 2018/11.

In this regard, Thailand Department of Fisheries (DoF) would like to take this opportunity to submit the comments on new Australia's import conditions. The comments are as follows.

To comply with the import conditions for prawns and prawn products into Australia, the test method used in analysis of the products for the presence of WSSV and YHV1 is crucial. The test method should be elucidated in more details as different test methods have been shown to have different sensitivity in detection of the pathogens (Sritunyalucksana *et al.*, 2006). This is to prevent discrepancy that may occur and negatively affect smoothness of trade.

Furthermore, real-time PCR technique is highly sensitive and it has been shown that only 4 (Durand and Lightner, 2002) and 5 copies (Sritunyalucksana *et al.*, 2006) of WSSV could be detected using real-time PCR. Nevertheless, this technique is not able to demonstrate viability of pathogens detected. Interestingly, Bateman *et al.* (2012) conducted a challenge experiment of European lobster by feeding two groups of WSSV-positive imported prawn products categorized into high dose (10^5 copies ng^{-1} total DNA) and low-dose (10^2 copies ng^{-1} total DNA). The result showed that the experiment group fed with low-dose did not show any pathognomonic signs of WSD or mortality. This is in agreement with an experiment of 10^3–10^4 copies mL^{-1} from Durand and Lightner (2002) which is more likely to establish latent infection. Therefore, it is skeptical that how much risk of very low level of WSSV (i.e. below 10 copies) for WSD spreading.

Additionally, scientific information about the potential for latent infection to progress to a disease state and become infectious is still lacking. It would be utmost important for us as trade partners to work in close collaborations to achieve this information to ensure that the import conditions are appropriate.

Your kind consideration on these matters would be highly appreciated. If you require entire documents that we cited in this letter, please do not hesitate to contact us.

Yours sincerely,