

The Seafood Importers Association of Australasia (SIAA) response to the DAWE review of the biosecurity risks of prawns imported from all countries for human consumption

The Association welcomes this opportunity to provide feedback on the prawn biosecurity risk review. The Association recognises the detailed and comprehensive review of the prawn biosecurity risk assessment that has been undertaken by DAWE over the last few years and outlined in this new report.

The Association recognises the need to have biosecurity controls in place to ensure the control of any recognised risks and to minimise any harm to the Australian environment.

The Association notes that the department has identified 10 prawn diseases that have been identified that require controlling through the implementation of relevant risk controls, to achieve Australia's appropriate level of protection (ALOP) to the described very low or negligible levels.

We have summarised these diseases and the required risk control measures on the table below.

Summary of the controls outlined in the 2020 Prawn IRA report with regard to the importation of raw prawns into Australia

Disease issue identified in new Prawn IRA report	Control Mechanism to achieve ALOP	ALOP* (appropriate level of protection) Rating once controls applied
Candidatus Hepatobacter penaei	Freeze	Negligible
covert mortality nodavirus	Head & shell removal	Very Low
decapod iridescent virus 1	Head & shell removal	Very Low
Enterocytozoon hepatopenaei	Head & shell removal and deveining	Very Low
infectious myonecrosis virus	Head & shell removal	Very Low
Laem-Singh virus	Head & shell removal	Very Low
Taura syndrome virus	Head & shell removal	Very Low
Vibrio parahaemolyticus strains containing Pir toxins	Head & shell removal	Very Low
white spot syndrome virus	Head & shell removal	High
	Head & shell removal followed by testing pre and post export	Very Low
yellow head virus genotype 1.	Head & shell removal	Moderate
	Head & shell removal followed by testing pre and post export	Very Low

*ALOP needs to be Very Low or Negligible to meet Australian biosecurity requirements

Other options outlined in the report that also achieve a suitable level of biosecurity control are:

- cooking
- value-added products (which encompasses pre-fried breaded, battered and crumbed prawns, and dumpling and dim sum type-products containing uncooked prawns)
- sourcing from disease free populations

These biosecurity controls provide the industry with three recognised product channels for imported prawns.

- Deveined raw prawn meats or cutlets that require pre and post export testing for white spot syndrome virus and yellow head virus genotype 1.
- Cooked prawns (shell on or off)
- Value added prawn products such as pre-fried breaded, battered and crumbed prawns, and dumpling and dim sum type-products.

As you can see from the table below all three of these channels are important in the trade of imported prawns and hence to Australian consumers.

Category	Volume in 2019 (tonnes)
Raw prawn meats or cutlets	9,319
Cooked prawns	6,087
Value added prawn products	13,058

The total trade in imported prawns in 2019 was 28,494 tonnes, worth at the point of importation \$414.7million AUD. This represents 20% of all seafood imports by value and 13% by volume.

The Association welcomes the fact that the risk assessment process has been able to identify relevant biosecurity controls, that address the identified risks, whilst still allowing for viable importation channels for imported prawns.

We recognise that this is in keeping with the WTO Agreement on the application of Sanitary and Phytosanitary (SPS) measures, which sets out the rules for food safety and animal and plant health standards. It allows countries to set their own standards, **recognising that these standards should be applied only to the extent necessary** to protect human, animal or plant life or health.

We welcome the fact that the Australian government have followed recognised WTO principles and not looked for a single 'one size fits all' solution, as advocated by some, such as only allowing the importation of cooked prawns into Australia. Which would not be in keeping with WTO principles.

Our members have adjusted to the new controls that have to put into place over the last 4 years to meet these biosecurity requirements. Namely the virus testing of the raw prawn meats and cutlets, the introduction of the pre-frying step for the breaded, battered and crumbed prawns and more recently the deveining of the raw prawn meats and cutlet products.

We recognise that this report also provides an opportunity for overseas governments to apply for products to be recognised as 'sourced from disease free populations' (16.2.1 Prawns sourced from a country, zone or compartment that is recognised by Australia to be free of pathogenic agents of biosecurity concern). We acknowledge that for this to be possible the department will need to undertake an evaluation of the exporting country's Competent Authority to approve the trade. Any product and its production environment will clearly need a very detailed government to government audit process, to ensure it meets all the relevant requirements before it could proceed. We are aware that there are some overseas fully enclosed bio-secure prawn farming facilities that might be interested in exploring this potential 'fourth' option.

We thank the department for the opportunity to respond to this prawn biosecurity review. We will continue to work with our members to ensure that they are able to comply with all the relevant legal requirements including those related to biosecurity.

Executive Officer – Seafood Importers Association of Australasia (SIAA)

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