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Dr Robyn Martin
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Dear Dr Martin,

**Comments on Draft IRA Report
for Horses from Approved Countries**

Thank you for the opportunity to comment on your draft IRA, we hope that our comments are of assistance and would appreciate a response to the various points raised -

1. Page 83, Section 5.6 Contagious Equine Metritis, 5.6.1 Technical Information: Background. Grateful if you can add that Hong Kong has never reported CEM, as per reporting to the OIE.
2. Page 119, Section 5.13 Equine infectious anaemia, 5.13.1 Technical information: Background. Grateful if you can add that Hong Kong last reported EIA in 1976 and is free of EIA, as per reporting to the OIE.
3. Page 120, Section 5.13 Equine infectious anaemia, 5.13.1 Technical information: Conclusions. Although AFCD respects that the IRA adopts the OIE Code recommendations, there does not seem to be allowance for countries that are free of EIA to be exempt from testing. AFCD understands that New Zealand is exempt from testing and both Hong Kong and New Zealand are free of EIA. AFCD requests that Hong Kong should also have the option to export to Australia without testing.

As detailed in the OIE Code Article 2.1.2 "The potential hazards identified would be those appropriate to the species being imported, or from which the commodity is derived, and which may be present in the exporting country". As EIA is not present in Hong Kong, it does not pose a hazard and thus measures are not required. Furthermore, Hong Kong (like New Zealand) requires EIA testing for all imported horses. This will also mean that New Zealand will not be mistakenly perceived as a "most-favoured-nation" and be in alignment with the principles of the WTO. Similarly Page 358, Section 8.1.3 Certification before export, and Page 380, Section 8.2.3 Certification before export, should be updated to include an option to declare country freedom.

4. Page 122, Section .14 Equine Influenza, 5.14.1 Technical information: Background. Grateful if you can add that Hong Kong last reported EI in 1992 and is free of EI, as per reporting to the OIE.
5. Page 127, Section 5.14 Equine Influenza, 5.14.2 Risk assessment: Release assessment. AFCD agrees with your assessment that "the likelihood of release of EIV associated with horses from a country where the disease is present was estimated to be 'moderate'" but this does not specifically address Hong Kong which is EI free. AFCD kindly requests that the release assessment is amended to include countries where EI is absent.
6. Page 149, Section 5.16 Equine piroplasmiasis, 5.16.1 Technical information: Background. Equine piroplasmiasis has never been reported in Hong Kong. We have noticed this and will provide update report to the OIE accordingly. Please can you include this in the draft IRA.
7. Page 167, Section 5.18 Equine viral arteritis, 5.18.1 Technical information: Background. EVA has never been reported in Hong Kong, as per reporting to the OIE. Grateful if you can include this in the draft IRA.
8. Page 171, Section 5.18, Equine viral arteritis, 5.18.1 Technical information: Conclusion. Although AFCD respects that the IRA adopts the OIE Code recommendations, there does not seem to be allowance for countries that are free of EVA to be exempt from testing. AFCD understands that Australia recognises New Zealand's control of EVA shedder stallions and does not require testing for mares and geldings, and only requires testing of stallions within 12 months of export. Hong Kong requests that these measures also be applied to our exports and that consideration be given to exempt Hong Kong from such testing.

In addition there are no breeding establishments in Hong Kong and our small equine population is more intensely monitored than New Zealand's. As detailed in the OIE Code Article 2.1.2 "The potential hazards identified would be those appropriate to the species being imported, or from which the commodity is derived, and which may be present in the exporting country". As EVA is not present in Hong Kong, it does not pose a hazard and thus measures are not required. Furthermore, Hong Kong (like New Zealand) requires equine piroplasmosis testing for all imported horses. This would ensure that New Zealand will not be mistakenly perceived as a "most-favoured-nation" and be in alignment with the principles of the WTO. Similarly Page 361, Section 8.1.3 Certification before export, and Page 384, Section 8.2.3 Certification before export, should be updated to include an option similar to New Zealand's requirements or for Hong Kong to declare country freedom.

9. Page 298, Section 6.2.1 Equine Influenza. The assessment made regarding EI is not applicable to Hong Kong as this section deals specifically with EI endemic countries and countries where there is a "substantial equine population" and the risk assessment made in section 5.14.2 is not applicable. Hong Kong should not be placed into the same category as other countries regarding EI. In Hong Kong the equine population is one of the most intensely monitored equine populations in the world. Our import requirements are of an extremely high standard and all horses are tested both prior to and after entry into Hong Kong and all horses are fully vaccinated against EI. There is also a minimum of 14 days quarantine in Hong Kong after importation. As stated in the risk assessment "EIV does not result in a carrier state", so there is no possibility of the introduction of EI into Hong Kong. Since 1992 there has not been a case of EI in Hong Kong. All horses in Hong Kong undergo intensive disease monitoring programmes having their temperatures monitored twice daily. Any case of unexplained pyrexia will undergo testing for EI. We are unaware of any other country that exports horses to Australia where this level of monitoring is conducted. The risk associated with horses exported to Australia is significantly lower than many other jurisdictions (with the exception of New Zealand).

AFCD would like to propose that in order to provide further assurances to Australia regarding our EI status that we will conduct ongoing surveillance of the entire Hong Kong equine population to demonstrate freedom from EI, including targeted surveillance of high risk populations (i.e. recent imports). AFCD will send BA details of this proposed surveillance programme once it had been formalised for BA's approval.

AFCD requests that the IRA takes into account the current situation in Hong Kong and that the hazard is correctly assessed taking this into account. In addition to this we would like to suggest that section 6.2 be amended to include an option for freedom with vaccination and ongoing surveillance provided it meets with BA approval. In light of this we request that the pre-export quarantine is re-evaluated to reflect the significant reduction in risk of introduction of EI.

10. Page 309, Section 6.2.1 Equine Influenza, paragraph 1. AFCD understands that many countries, including Hong Kong, have problems with running a PCR test within 4 days of export due to the logistics required with sampling, transportation of the samples to the laboratory, operational hours of the laboratory (no tests run over the weekend) and arrangement of flights. AFCD would kindly request that the 4 days are extended to 6 days, or possibly the 4 days be interpreted as 4 working days.
11. Page 309, Section 6.2.1 Equine Influenza, first paragraph. AFCD would kindly request that current technology for rapid influenza antigen detection tests is also added as an alternative to the PCR test. This will also assist in managing the short period prior to export where EI testing is required. Further information from Yamanaka et al (2008) and Bai et al (2005) regarding the rapid tests are attached.

Any changes to Section 6.2.1 would obviously have to be reflected in sections 8.1.3 and 8.2.3.

12. Page 317, Section 6.2.2. Equine piroplasmiasis, point 2. The conclusions of Biosecurity Australia regarding Butler et al. (2008) are not correct, Butler et al. only looked at the PCR tests post treatment with imidocarb. At no stage did he look at the IFAT or CFT results. Thus the assumptions that a horse will be IFAT and CFT (i.e. antibody) negative post treatment are unsubstantiated. AFCD believes that the conclusions reached on page 317 should be amended to reflect the current scientific literature available, treatment with imidocarb or other anti-babesial agents should not influence the serological status of an animal as a temporary decline in PCR detectible antigen should not have a significant effect on a positive serological titre. Similarly on page 361, Section 8.1.3 Certification before export, point g. should be removed as well as Page 383, Section 8.2.3 Certification before export, point g.

13. Page 347, Section 7.1, second paragraph. AFCD considers the need for an official veterinarian to be present at the loading of the horses from the PEQ facility excessive for Hong Kong, as well as the sealing of vehicles. Hong Kong Jockey Club have procedures in place to ensure the vehicles are disinfected prior to use and if the horses are offloaded for any reason they will inform AFCD. We would kindly request that BA considers the unique situation in Hong Kong and makes allowance that this requirement can be removed if BA recognises that equivalent measures are in place. This applies similarly to page 355, Section 8.1.3 Certification before export, point 4; Page 367, Section 8.1.4 Transport, point 3; Page 378, Section 8.2.3 Certification before export, point 4; and Page 390, Section 8.2.5 Transport, point 3.
14. Page 351, Section 8, paragraph 6. AFCD appreciates that BA has set realistic time frames for disease freedom, to realistically certify disease freedom for a disease that is not notifiable greater than 90 days ago is sometimes very difficult.
15. Page 354 Section 8.1.3 Certification before export and Page 377, Section 8.2.3 Certification before export. AFCD request that the sentence “The Official Veterinarian must certify” is amended to “The Official Veterinarian must certify after due enquiry” as the certifying veterinarian will most likely not have first-hand knowledge to enable him/her to certify that the horse has not being tested positive or treated for equine piroplasmiasis within the 60 days prior to export or in the case where residency is split over two or more countries. The certifying veterinarian will have to rely on information provided by the owner/agent of the horse or the certification from the previous country.
16. A paragraph in point (b) from Page 358, Section 8.1.3 Equine infectious anaemia is missing in Page 380, Section 8.2.3, Equine infectious anaemia. Is this difference intentional?

Please let my colleague, Dr Eric Tai (email : eric_hf_tai@afcd.gov.hk), know if you need any further clarification on the points raised above. We look forward to your comments on the various issues raised above especially taking into account Hong Kong’s unique situation regarding equine influenza freedom with vaccination.

Yours sincerely,



(Dr Thomas SIT)

for Director of Agriculture, Fisheries and Conservation