

Attn : Dr Jill Millan,

Thankyou for sending us the Invitation to Comment and I apologise for the late response.

The report is exhaustive and covers a great deal of ground. Unfortunately it's very size has prevented me from being able to go through it in detail and comment on every point that might impact on our ability to import horses into Australia. We are a small company with limited human resources and I have just not had time as we have been flat out just trying to maintain our business.

Our main concern in general terms is that it has already, in the wake of the EI outbreak, become incredibly difficult and expensive to import horses into Australia. We have seen a number of BA instigated new requirements that have proved impractical to implement in this period. There needs to be a balance struck between practical and reasonable requirements and the 'wish list' of how in an ideal world all exotic diseases could be kept out of Australia.

I guess we are going to have to see what the specific details are on when individual country import health requirements are released for comment, to make specific comments but I expect BA is already very much aware of the issues that import agents find impractical and I would hope that they have been taken into consideration in drafting conditions.

We understand that the IRA is not concerned with commercial considerations but unfortunately the real world is what we have to operate in and we are already at the stage where the AQIS have increased costs to the point where horses are now travelling to NZ and quarantining there before being on-shipped to Australia, as being a cheaper route. This is going to reduce the number of horses being imported directly into Australia which will in turn increase the costs as AQIS seeks to recoup their costs to operate the quarantine station and horse import program. This will again force more people to import via NZ and the spiral will continue.

This might not concern BA as you might feel that quarantining 'off shore' is a good solution to keeping exotic diseases out of Australia but it will have a major impact on the horse industry in Australia, including our ability to export horses in a competitive global market.

I understand BA has a duty in relation to Market Access as well and trust that this will be taken into consideration.

We look forward to see the final conditions.

Kind regards

Crispin Bennett

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Attention: Dr Colin J Grant Chief Executive

Please accept my apologies for the slow reply in respect to comments on Biosecurity Australia Advice 2009/28 Draft import risk analysis report for horses from approved countries. The document is particularly long and we have limited resources. I trust that the following comments, although late, will be accepted.

Due to time constraints I have limited my reading within the document to equine influenza, transport from approved countries and proposed quarantine measures for importation of horses.

Although significant research on Equine influenza (EI) has been undertaken by Biosecurity staff, I have concerns that in the thrust to balance risk management of disease, cover the public's concerns and consider the recommendations made in the Callinan report, testing requirements for EI are still overly cautious.

In part, the Callinan report mentioned that retrospective testing of horses quarantined at Spotswood Quarantine Station (SQS), Victoria, showed them to have been infected with EI. If this were so it proves that quarantine works, as EI did not occur in Victoria.

Compared with current standards, minimum quarantine standards at the time were observed both on the landing of the horses in Melbourne and during post arrival quarantine (PAQ) at SQS. Further, no measures were taken during pre export quarantine (PEQ) in the country of origin to test horses for influenza A virus. Procedures have now changed and any horse shedding or infected with influenza A virus would almost certainly be isolated before any animal on the consignment is imported to Australia.

Considering the procedures followed during PAQ at SQS in Victoria at the time of the EI outbreak in New South Wales contained EI within the quarantine compound, testing alone for influenza A virus during PAQ could be considered a sufficient measure to keep EI from getting out into Australia.

The following recommendations were made by the Expert Panel:

During pre export quarantine (PEQ):

Nasopharyngeal samples, using polyester fibre (e.g. Dacron®) swabs, have been taken from the horse four to six days after commencement of PEQ and during the four days before export and tested using a polymerase chain reaction for influenza A virus with negative results in each case.

During post arrival quarantine (PAQ):

Nasopharyngeal samples, using polyester fibre (e.g. Dacron®) swabs, must be taken from the horse four to six days after commencement of PAQ and within four days of release from PAQ and tested using a polymerase chain reaction for influenza A virus with negative results in each case.

The Expert Panel also recommended:

For the duration of PAQ the rectal temperature of the horse must be taken and recorded twice daily at least eight hours apart. If the temperature is 38.5 °C or higher on two consecutive recordings, a nasopharyngeal sample, using polyester fibre (e.g. Dacron®) swabs, must be taken and tested for influenza A virus and AQIS notified. If the temperature cannot be taken for any reason on two

consecutive occasions, AQIS must be notified and a clinical examination by a registered veterinarian performed. Temperature records must be made available for inspection by AQIS.

In following this latter recommendation, a horse could have a rectal temperature of 38.5 °C or higher on two consecutive recordings and be tested two days in a row for influenza A virus. A PCR test result for influenza A virus is available same day or at worst 24 hours after samples are taken. It is unlikely that the virus would incubate between the time the nasopharyngeal swab was taken and return of the (negative) test result—6 to 24 hours. It should be noted that EI has an incubation period of 1–4 days (Park et al. 2004). The initial test should be adequate to detect EI, if that was causing the higher temperature. Any subsequent tests for EI therefore appear to be superfluous.

Horses originating from the USA, EU and UK have at least a 24-hour period in transit to Australia. It is possible that EI may have incubated during this period. However, the transport can be stressful on many horses and some horses develop travel stress or pleuropneumonia. This condition will cause an increase in rectal temperature.

The horses have also travelled from a different climate and the change from a northern winter to an Australian summer can also cause an increase in rectal temperature particularly should a horse have a woolly coat, the weather temperature be high and conditions humid. Weanlings have been shown to have a naturally higher temperature than older horses which make them more prone to readings above 38.5C in the conditions as above. (Refer to attached supporting correspondence from Dr Andrew Argyle, Wollondilly Equine, who manages veterinary work during PAQ.)

The Expert Panel's recommendation to immediately test for the presence of influenza A virus due to a slight temperature increase is overly cautious and does not appear to have considered other causes for an increase in rectal temperature.

During PAQ, the Expert Panel has recommended two PCR tests for influenza virus A. Further consideration could be given to reduce this to once only in horses displaying a normal temperature on day five of PAQ commencement. Sufficient period has elapsed for EI to incubate should it be present. Australia is currently free from EI and as such the virus could not be imported into PAQ other than on the horses themselves. As mentioned above any subsequent test for EI appears to be superfluous and overly cautious.

The Expert Panel has made recommendations for arrival of horses in Australia but has not indicated the minimum number of AQIS staff required to fulfil the recommendations. Currently, a minimum of six AQIS staff members supervise the offload on horses arriving at Sydney Airport. A minimum of four AQIS staff supervised arrivals in Melbourne whilst SQS was operative. The number of AQIS staff used in NSW would appear to be excessive and requires clarification.

I regret I have no further time available to comment on the document and trust that my observations will be accepted.

Please do not hesitate to contact me should you have any queries.

Kind regards,

Sue Bennett

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All business undertaken is transacted subject to CBIHT's general conditions of trading, a copy of which will be supplied on request. All horses handled at the owner's risk.

# WOLLONDILLY EQUINE



## Veterinary Report

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Date: 04/02/2010

To Whom It May Concern,

With respect to swabs on horses at ECQS in the past week I have swabbed many horses which appear to be clinically normal in all respects. Furthermore haematological results on these horse were normal.

I would attribute these temperatures in the region of 38.6 0C to mild heat stress, especially in the young coated horses.

Your Faithfully

A handwritten signature in black ink, appearing to be 'A' followed by a flourish.

Dr Andrew Argyle B.V.Sc (PRET)  
Wollondilly Equine