

AQIS DRAFT IMPORT RISK ANALYSIS

Page	Ref	Comments
351		Residency requirements
	IRT	The draft protocol differs significantly from the existing protocol in as much as it requires certification that the horse has been resident for up to 6 months, prior export, on properties that have been free of certain diseases (ie for a period well in excess of the 60 days - the present requirement). For instance EEE/WEE 90 days, Glanders 6 months, Horse Pox 90 days, Rabies 6 months. Would reverting to the existing approach of providing residency certification for 60 days be considered.
353	8.1.2.1	PEQ within 250kms of departure airport
	IRT	Several of the existing AQIS/BA approved PEQs in Kentucky are over 250kms from the port of departure. For instance Lexington to Chicago is c 350 miles & Lexington to JFK is c 750 miles. An increase in the distance is requested.
354	8.1.2.7	All feed and bedding in before PEQ starts
	IRT	There needs to be a process for replenishment of feed in the event of a flight delay or spoilage
	8.1.3 f.	DEFRA understands that for export certification to Australia, it cannot use results from laboratories other than VLA, without the approval of AQIS, as there is no inter-EU cross border approval process to permit a UK/EU Ministry officially approving results from another EU country's National Laboratory. So for example, para 1.f prevents prevents an EVA VI test taken and tested in France to be officially used for a shipment which is being processed from the UK, or testing of mares for EVA whilst they are resident at an UK/EU stud which is outside the UK/EU exporting country, except with the event AQIS grant a dispensation to allow the laboratory result to be accepted. Sending of tests across EU state/country borders is often fraught with logistical difficulties, so we would ask that AQIS allow use of National Laboratory results in the export certification process from the country of origin's National Laboratory as well as those from the country of export.
	8.1.3.4	Tamper Evident seals
	IRT	Vet needs to oversee loading at PEQ to put on seals. No mention what the process is for breaking seals
356		Borna - 60 Day Country freedom
	IRT	If a horse is being exported from its country of residence, say Germany, it appears regional freedom is acceptable, however if the country of export is not the country of residence then certification requires country freedom, or alternatively for the horse to move to the exporting country for 60 days prior to export. If AQIS looked at EU as a country, then a German horse leaving from UK could qualify for 2nd option without having to do 60 days in UK as a country of export. However AQIS or the certifying authority don't look at EU as a country and Germany is not the country of export (if going from UK), as we read it, the horses would need to come to UK for 60 days prior to export. Therefore, we request this wording be changed to allow the 60 days prior to export to be spent in a region of a country free of Borna
	c.	CEM samples collected in the 30 days immediately before commencement of PEQ
	IRT	Completing the swabs prior to PEQ is an advantage however there are certain difficulties with this. 1) In the case of exports from UK originating from the continent DEFRA cannot use CEM testing other than that conducted at VLA in complying with the Australia import regulations. Furthermore, logistically collecting swabs from the continent for testing at CVL is problematic in that often the swabs won't arrive on time (i.e. within 48hrs) plus many vets who usually service training/racing establishments will not be familiar with collection & the form of media required for transport. The two latter points are particularly so for exports from USA. A possible solution would be marshalling the horses at or near PEQ prior to the start of PEQ and testing them on days 1, 4 & 7. This would allow testing to be completed by a 'breeding vet' experienced in the collection of CEM swabs providing timely, uniform & effective quality control not possible when testing in many far flung locations. From consulting with research vets familiar with CEM testing there appears no scientific data supporting the 7 day gap between tests other than it seems a 'good idea' in 1977 when these protocols were drafted.
357	c.	Endometrial or deep cervix swabs
	IRT	Collection of endometrial or deep cervix swabs is not encouraged by practicing vets Taking one swab in during Oestrus is difficult enough, especially in winter months.
		No use of antibiotics
	IRT	There would be more certainty this conditions had been met if all CEM swabbing took place at a centralised location under the control of the certifying vets as suggested above.
358		Equine Influenza - vaccination
	IRT	The position re EI vaccination of foals less than 6 months is contradictory in the draft. The modification of the EI conditions allowing a primary within 21-90 days of the start of PEQ is welcomed. However, as very few vaccines include the strains prescribed most (all) horses will require total revaccination if a booster, to a previously certified course using unprescribed vaccines, is not permissible. Furthermore, because of the varying vaccine manufacturer's recommendations (MRs) the racing authorities & FEI in Europe have adopted policies to embrace all the MR's which result in many histories meeting the racing authority conditions to perform but not the specific MRs. A similar policy adopted by AQIS/BA would avoid the constant need for a CofEs.
359	e	EI Swab - within 4 days of departure
	IRT	We have previously informed AQIS/BA that EI swabs cannot be completed with any certainty within 4 days of export in USA
	e	Dacron swabs
	IRT	Dacron is not the preferred fabric for collecting Nasopharyngeal samples in UK. The swabs provided to NEH (Official Vets) by AHT (Richard Newton) are cotton wool & gauze. The availability of Dacron swabs in UK & USA is being determined.
		Temps twice daily - 8 hours apart
	IRT	Temperature taking twice daily is a continual hazard to the attendants collecting the recordings & to the horses themselves. Daily collection should be adequate except where a horse is sick or circumstances require more regular monitoring. If twice daily temperature are to continue we need to find a better way that does impinge so heavily on OH&S issues.

361		Piroplasmosis Bloodtesting - 7 days into PEQ
	IRT	Based on the 14 days PEQ included in the draft conditions this allows only 7 days for Piro testing. Considering IFAT testing is so close to departure to if flight cancellations are bound to occur. Furthermore to accommodate for those instances when a reliable IFA result cannot be achieved should a different test being provided - Elisa?
		EVA Bloodtesting - 7 days into PEQ
	IRT	Based on the 14 days PEQ included in the draft conditions this allows only 7 days for EVA testing. Considering EVA testing is so close to departure last minute flight cancelations are bound to occur. Furthermore, to prevent a positive in PEQ delaying shipment, it appears to us each horse will need to be tested prior to the start of PEQ so that adequate time is available to demonstrate a stable titre is present on blood collected 14 days apart.
362	c.	EVA vaccination
	IRT	Option 1 (vaccination between 6/9 months) seldom occurs. Option 2 does not reflect the process adopted by the thoroughbred industries in Europe & USA where they test negative & then vaccinate. The process put forward by AQIS/BA recently with a NEG bloodtest & vaccination on the same day plus boosters as necessary seems to better reflect the procedure adopted by industry. Where an EVA vaccinated stallion fails to receive adequate boosters then a process of VI testing followed by revaccination should be articulated in the conditions. Further we believe EVA VI testing should be within 60 days as that gives adequate time to collect & get a result before the horses enters PEQ. 28 days as in the draft is impractical & results in a horses entering PEQ before a result is available.
367		West Nile Fever - Vaccination
	IRT	With vaccine unavailable in Australia the vaccination requirement restricts the ability for Australian based horses to travel to the Northern Hemisphere to compete and return in a timely manner. Horses have to wait an additional 28 days to receive a primary course of West Nile post competition. As horses are a dead end host is vaccination necessary?
368	7	Insect nets on all flights - HKG/SIN to Aust??
	IRT	On direct flights Asia to Australia or USA via HNL to Australia nets would appear superfluous
369	3	AQIS - Check horse docs at airport - Why??
	IRT	Considering by the time of arrival AQIS will have approved shipment using the checklist supplied by the certifying vet isn't this superfluous. Also, if there is a problem with the Health Certificates the horses will still be sent to the PAQ as there is no alternative - ie often the Aircraft does not return to the departure port. It is also safer and easier to check the horses in the controlled environment of the PAQ.
370		CEM - importing pregnant mares
	IRT	No CEM surveillance conditions have been included in the IRA. If the foal at foot is CEM tested why should it not be released from quarantine surveillance?
370		Equine Influenza - 21 Day PAQ
	IRT	Based on the additional vaccination requirements, PCR tests and temperature taking, is the additional 7 necessary? Even with the case in Australia the Flu was found within the 14 day PAQ. The extra 7 days has a large impact on the coast and rotation of shipments through the quarantine station. Especially for breeding stallions.
373	8)	During PAQ, the facility must be occupied only by horses of the import consignment.
	IRT	Does this mean it would not be possible for International Runners or Return Australian horses to have a local horses as a companion horses in PAQ?
374	19)	Horses must not leave the facility during PAQ.
	IRT	We assume BA considers the track part of the PAQ?
378		Official vet present during loading
	IRT	Vet needs to oversee loading at PEQ to put on seals. No mention that I can see of what process is for breaking seals
381		For the duration of PEQ the horse has not been held, housed or exercised within 100 metres of other equids not of equivalent health status
	IRT	What's the basis of this ruling? Why 100m ? Should the same distance apply for all countries?
396	8)	During PAQ, the facility must be occupied only by horses of the import consignment.
	IRT	See comments Re Pg 373 above
399	10)	Horses must not leave the facility during PAQ.
	IRT	See comments Re Pg 374 above
405	8.3.4 1)	Exporters or their agents must have detailed SOPs consistent with a risk-based approach and approved by AQIS, to cover procedures including contingency plans, for transporting the horse from PEQ until arrival in Australia
	IRT	There are so many variables that it is impossible to have a details contingency. There are thousands of alternate airports that an aircraft could land at between the Northern Hemisphere and Australia. Also the actions of the airline are outside the control of the shipping agent. The most practical solution would be a simple action plan that should be implemented including Key Contact personal in the event of an aircraft diversion, as is the case now.