



Animal Biosecurity
Biosecurity Australia
GPO Box 858
CANBERRA ACT 2601

1st February, 2010

ATTN: DR COLIN J GRANT – CHIEF EXECUTIVE

Dear Sirs

**RE: BIOSECURITY AUSTRALIA ADVICE – 2009/28
DRAFT IMPORT RISK ANALYSIS REPORT FOR HORSES FROM APPROVED
COUNTRIES**

The above IRA is certainly a thorough document providing horse shippers with an informed insight into equine diseases.

From IRT's perspective, we feel it is vitally important that the technical health requirements are balanced with the day to day logistical constraints involved in moving live horses around the globe. It would be of little use introducing new protocols which, despite our best intentions, we simply could not physically implement.

Please find attached herewith a point summary of aspects within the new draft import protocol that are of concern to IRT. It would be appreciated if further consideration could be given on some areas and a more expansive explanation could be provided as to the reasoning behind BA's adoption of other aspects of the protocol.

It would appear that in some instances OIE guidelines have been accepted as a safe answer rather than developing a practical solution which meets the market's risks as they specifically relate to Australia.

An example of this would be the adoption of the OIE EVA clause.

- ❖ The clause has several inconsistencies one being the test breeding of two mares anytime during a 12 month period. The stallion could have a huge amount of exposure once the last mare is tested.
- ❖ Also, if EVA is of such serious concern, why is not more done within the domestic equine population?

Note : An example of some issues we believe require attention follow – please refer to our attached summary spreadsheet for a complete list.

FLU VACCINATION:

- Insisting on vaccine with strains not readily available throughout the world
- Manufacturer's recommendations – these vary greatly and often horses are vaccinated over a period of years by many different brands of vaccine – a more simplified system needs to be adopted

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CEM

- Testing 30 days prior to PEQ leaves this process very much outside the control of the exporter
- Forces the shipper to assemble all horses earlier than needed for shipping purposes to centralise testing thus effectively creating a minimum 30 day PEQ and greatly increasing the costs.
- Deep cervical swabs of young fillies

100M PEQ SEPARATION

- What is the science behind this distance? Is there a substantially greater disease risk from a smaller distance? It is important to understand what benefit in disease control this provides as there is a large impost in administering this requirement.

21 DAY PAQ

- Does this adequately balance with the number of additional checks and balances in place for EI ? In 2007 the outbreak of EI was detected during the 14 day PEQ, since that time the vaccination requirements have significantly increased, there is twice daily taking of rectal temperatures and a minimum of 4 PCR's – would an active case of EI not be revealed even earlier ???

In summation, IRT believe to avoid overly restricting trade, there needs to be a better balanced approach between absolute risk, operational practicalities and cost factors.

Yours sincerely

INTERNATIONAL RACEHORSE TRANSPORT PTY LTD

Christopher F Burke
MANAGER – OPERATIONS.

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