



file no: 00/9252  
30 November 2000

**BIOSECURITY  
AUSTRALIA**

**ANIMAL BIOSECURITY POLICY MEMORANDUM 2000/55**

## **IMPORTATION OF COMMERCIAL RABBITS FROM MEMBER STATES OF THE EUROPEAN UNION**

### **FINALISATION OF QUARANTINE REQUIREMENTS**

This Animal Biosecurity Policy Memorandum (ABPM) provides revised quarantine requirements for the importation of commercial rabbits from Member States of the European Union (Attachment A). The conditions come into effect on 30 November 2000.

In June this year draft amended conditions for the importation of commercial rabbits from the European Union were circulated to stakeholders for comment under Animal Quarantine Policy Memorandum 2000/33. Five responses were received. A summary of the written comments received and Animal Biosecurity's response is at Attachment B.

Several changes have been made to the quarantine requirements in response to further comments from stakeholders and those from Dr Coudert (the scientist commissioned by Biosecurity Australia to prepare a report on epizootic rabbit enterocolitis (ERE)). Two of the stakeholders recommended that if live rabbits were to be imported into Australia they should be exported from their country of origin as one day old rabbits to minimise the risk of introduction of ERE. Additional information was also received demonstrating that the practice of shipping one day old rabbits is common. For example of 280,000 breeder rabbits shipped last year 70% of these were as one day old. These have been shipped from Europe to USA and to South America. Clarification was also sought on International Air Transport Association (IATA) regulations on the transport of unweaned rabbits. IATA is currently considering guidelines for the transport by air of young animals but no decision has been made.

After consideration of the above comments and in view of Dr Coudert's initial proposal, the export of one day old rabbits has now been included as an option in the quarantine requirements. The other option is for rabbits to be exported post-weaning. Following circulation of the draft requirements Dr Coudert recommended that to minimise the likelihood of exporting older rabbits infected with ERE, one day old rabbits should be removed from the breeding does (from the farm of origin), and be placed in a pre-export isolation facility where they would be adopted by specific pathogen free (SPF) laboratory does. The young rabbits would remain in pre-export isolation, monitored with sentinels, until export to Australia. In light of these comments, Biosecurity Australia has amended the quarantine requirements.

It was also suggested that the kits could be sourced from several breeding farms. Biosecurity Australia does not support this proposal due to the increased likelihood of disease introduction into the pre-export isolation facility when sourcing animals from different properties. If large numbers of rabbits are to be exported, and one breeding farm is unable to provide sufficient numbers, smaller separate consignments

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could be exported providing all the quarantine requirements are met for each consignment.

The sourcing of sentinels has been specified as from an Australian Quarantine and Inspection Service (AQIS) approved facility (for example the SPF INRA Breeding Facility). The number of sentinels to be placed with the breeding does, bucks and kits has been amended ie from one sentinel per 15 does to one sentinel per 10 does with a minimum of 20 sentinels.

Clause 2.10 was amended to delete the option of country freedom for rabbit haemorrhagic disease as this disease is present throughout Europe.

Post-arrival quarantine (PAQ) has been amended from 30 to 60 days quarantine. Following completion of PAQ the imported animals and any progeny will remain under quarantine surveillance for 12 months.

### **Next Steps**

These conditions come into effect immediately.

I would be grateful if you would pass details of this notice to other interested parties, who should advise Biosecurity Australia if they wish to be included in future communications. Enquiries should be directed to the officer whose contact details appear below.

### **Confidentiality**

Respondents are advised that, subject to the *Freedom of Information Act 1982* and the *Privacy Act 1988*, all submissions received in response to Animal Biosecurity Policy Memoranda will be publicly available and may be listed or referred to in any papers or reports prepared on the subject matter of the Memoranda.

The Commonwealth reserves the right to reveal the identity of a respondent unless a request for anonymity accompanies the submission. Where a request for anonymity does not accompany the submission the respondent will be taken to have consented to the disclosure of his or her identity for the purposes of Information Privacy Principle 11 of the Privacy Act.

The contents of the submission will not be treated as confidential unless they are marked 'confidential' and they are capable of being classified as such in accordance with the Freedom of Information Act.

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## Attachment B

### Summary of responses

Respondent Comment	Response
Would be easier to import rabbit semen than live rabbits.	The original access request was for live rabbits following the suspension of conditions in 1987. Importation of rabbit semen has been placed on the BA access register.
Quarantine requirement noted – no specific comments	
Surprise about concerns re welfare of 1 day old rabbits in light of Australia’s efforts to contain the population of wild rabbits. Conditions should ensure safe importation without significant risk for commercial rabbits and sees no potential risk to other animal industries from cross species infection.	Noted  Noted
Because the disease ERE is unknown it would be difficult to determine if ERE is present in the rabbits for export using sentinels.  It is possible to do serological tests to detect disease on the farm of origin. The pre-export regimen could also be conducted under the supervision of the University of Utrecht and IDDLO, Netherlands. 10 sentinels minimum for bucks is too many due to the low number of bucks that would be used.  Should state where the sentinels come from and what type of sentinel.  If animals develop diarrhoea during the quarantine period need to determine if infectious or due to feed. Suggest feed only pelleted feed. Use only wood or paper shavings in cages, hay or straw could be contaminated from wild rabbits. During PAQ imported rabbits should go into an empty facility to minimise the chance of the imported rabbit becoming infected with rabbit diseases already present in Australia.	Monitoring the farm of origin and animals for export with sentinels provides the best assurance that ERE will be detected if present.  Serological tests are not available for ERE.  The conditions provide for the involvement of approved institutes in addition to INRA.  Requirements amended following advice provided by Dr Coudert that at least 20 sentinels are needed.  Conditions amended to include certification of disease status of sentinels and SPF laboratory does (foster dams). Sentinels to be sourced from INRA. SPF laboratory does to be of known, monitored health status, and maintained under barrier conditions. All cases of diarrhoea to be investigated to rule out ERE. Management issue. Conditions amended to state that straw or hay has not been used in cages. Not a quarantine issue but prospective importer’s should note.
The preferred method of transporting rabbit genes to Australia should be as frozen semen or embryos (recognises that there is no way of categorically identifying if rabbits, semen or embryos are free of ERE). Embryos though can be washed and transported in sterile solution – much safer than live rabbits.  If semen and embryos imported into Australia stand a far better chance of surviving diseases encountered in rabbitries in Australia. Kittens born in Australia would receive the natural antibodies of the Australian dam.	Biosecurity Australia (BA) recognises that in some species embryos offer a safe alternative to live animal imports and is proposing to investigate further the possibility of rabbit embryo imports. Nonetheless this review was of existing but suspended import conditions for live rabbits. The amended conditions were developed to minimise the likelihood of exporting live rabbits infected with ERE.  Noted.

Respondent Comment	Response
<p>Importing rabbits in the most susceptible age range for ERE 6-10 weeks creates the highest risk of introducing the disease –day old kittens safer and semen and embryos safer still.</p> <p>Importing rabbits from farms that do not have an intensive production system which predisposes to ERE (Angora rabbits) is also a high risk. Rabbits may carry the pathogen and it won't become evident until they, or the rabbits they come in contact with, enter a more intensive management system.</p> <p>Quarantine in Australia with SPF rabbits in an environment dis-similar to the commercial one where ERE becomes evident is unlikely to add much information. 12 months of quarantine after they arrive is excessive.</p>	<p>Conditions amended providing an option for export of 1 day old rabbits or export of older rabbits after requiring 1 day old rabbits be placed in PEQ and adopted by SPF laboratory does.</p> <p>BA recognises that in a less intensive system ERE may not be as easily recognised, however, the disease may also not be present in these less intensive systems. Nonetheless the conditions have been developed to increase the likelihood of detecting ERE with the use of sentinels whatever the production system.</p> <p>SPF rabbits not required during PAQ.</p> <p>Proposed 30 days quarantine amended to 60 days and on completion imported animals and any progeny are under quarantine surveillance for 12 months – ensures that AQIS is informed should diseases of concern become evident after importation.</p>
<p>There appears to be a reference in Note 10 (on rabbit science web site) to potentially sub-clinical infections. Can not find any other reference to the use of sentinels – nor does Dr Coudert claim this proven method.</p> <p>SPF rabbits will be very expensive. If INRA SPF breeding facility not used in the pre-export quarantine regimen lesser SPF rabbit sentinels may be used and these may be rabbits that have survived primary infection and developed a resistance.</p> <p>Use of 1 day old rabbits would reduce the risk. Possibly caesarean section may further reduce the risk of infection. An even more sound method may be frozen embryos. If the draft proposal for older rabbits is based on concern for the mortality rate it is severely misplaced. If the AQIS proposal for older rabbit importation is scientifically based please provide the reference.</p> <p>Conclude that, based on information available, respondent is opposed to the proposal for the importation of commercial rabbits from any country with ERE.</p> <p>Rationale</p> <ol style="list-style-type: none"> <li>1. Insufficient information to form any other conclusion. Would like paper presented at the World Rabbit Congress and Notes 9 and 10 from the rabbit science web site (translated).</li> <li>2. The framing of Dr Coudert's proposal is such to indicate he has been asked to provide a "least</li> </ol>	<p>BA recognises that sub-clinical infection may occur or clinical signs may be mild. This is one reason for the extensive monitoring with sentinels and that all animals with diarrhoea are thoroughly investigated. Dr Coudert has used sentinels extensively as a system to detect disease.</p> <p>Noted. Conditions amended to include certification of disease status of sentinels and SPF laboratory does (foster dams). Sentinels to be sourced from INRA. SPF laboratory does to be of known, monitored health status, and to have been maintained under barrier conditions.</p> <p>See comment above re 1 day old rabbits and embryos.</p> <p>Note 9 and paper titled ERE of the rabbit: review of current research sent. Note 10 has not been translated but BA has been in contact with Dr Coudert, one of the authors of the Notes, throughout this project</p> <p>Quarantine is based on "managed risk" there is no such thing as a "zero risk" quarantine policy.</p>

Respondent Comment	Response
risk scenario”.	
3. ERE has not been diagnosed in the countries of origin, nor successful treatment or preventive vaccine.	BA considers that ERE may be present in all EU Member States. There is no serological test for the diagnosis of ERE but diagnosis is based on clinical signs and pathology.
4. The AQIS proposal to import rabbits older than 1 day is not supported by research evidence.	Conditions amended to include option for export of one day old rabbits.
5. Clause 2.3 prohibits antibiotics via feed or water. Should note that antibiotics are routinely used to support breeders via the sub cutaneous route.	The use of antibiotics by direct inoculation is covered by clause 2.6.
6. Consider that PAQ should be conducted in AQIS facilities at the expense of the importer.	Privately operated PAQ facilities may be approved by AQIS but will be supervised by AQIS at the expense of the importer.
7. Use of sentinel rabbit as a pre-mating monitor may conflict with conclusions drawn by Couderc where he suggests adult rabbits only rarely exhibit disease.	Sentinels are to be added to the breeding colony as it is recognised that adult breeding does may not always exhibit signs. The sentinel rabbits are naïve and very receptive to infectious agents.
8. Can find no information as to zoonoses of ERE.	BA is unaware of any reports of ERE being suspected as a zoonosis.