

*Import risk analysis: Llamas
(*Lama glama*) and alpacas
(*Vicugna pacos*) from
specified countries*

REVIEW OF SUBMISSIONS

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Policy and Risk
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Approved for general release

A handwritten signature in black ink, appearing to read 'Christine Reed'.

Christine Reed
Manager, Risk Analysis
MAF Biosecurity New Zealand

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Contents

Executive Summary	3
1. Introduction	4
2. Review of Submissions	6
2.1. Raana Asgar, Biosecurity Australia, Department of Agriculture, Fisheries and Forestry	6
2.2. Chris Houston, Beef and Lamb New Zealand Ltd (B+LNZ) and the Meat Industry Association (MIA)	10
3. Copies of Submissions	16
3.1. Raana Asgar, Biosecurity Australia, Department of Agriculture, Fisheries and Forestry	16
3.2. Chris Houston, Beef and Lamb New Zealand Ltd and the Meat Industry Association	18

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Executive Summary

MAF Biosecurity New Zealand (MAFBNZ) released the draft document *Import risk analysis: Llamas (*Lama glama*) and alpacas (*Vicugna pacos*)* from specified countries for public consultation on 01 September 2010. The closing date for public submissions was extended from 13 October until 21 October 2010 to accommodate an extension request from Beef and Lamb New Zealand Ltd and Biosecurity Australia.

Based on comments made by stakeholders in response to the published draft import risk analysis, this review of submissions document makes recommendations for changes required to amend the draft document to a final risk analysis.

The next step in this process will be for the Animal Imports and Exports Section of the Border Standards Directorate of MAFBNZ to draft an Import Health Standard along with a guidance document and a Risk Management Proposal document that outlines the rationale for the preferred risk management measures. These documents will then be published for a six-week period of public consultation.

As a result of comments made in two submissions received, it is recommended that the following changes be made to the draft risk analysis to make it final:

1. For bovine herpesvirus type 1.1 (BHV1.1) and BHV1.2a, the following will be added into the epidemiology section 10.1.4. of the risk analysis: 'Australia reports that BHV-1.2b is present but BHV-1.1 and BHV-1.2a has never occurred (Animal Health Australia 2010).' See the submission section 2, comment 2.1.2. for details.
2. The words 'Central and' will be incorporated into the *Scope* section on page 4 to read: This risk analysis is restricted to camelids imported from Australia, Canada, the United States of America (USA), Central and South America and the European Union (EU). See the submission section 2, comment 2.2.1. for details.
3. For *Mycobacterium bovis*, the N.B. for option 2 in the risk analysis will have the 'higher health status' wording amended to become 'higher bovine tuberculosis status'. Further, the wording for option 3 will be changed to: For countries where the prevalence of bovine tuberculosis is higher than New Zealand. See the submission section 2, comment 2.2.14. for details.

1. Introduction

Risk analyses are carried out by MAFBNZ under Section 22 of the Biosecurity Act 1993, which lays out the requirements with regard to issuing Import Health Standards (IHSs) to effectively manage the risks associated with the importation of risk goods.

Draft risk analyses are written by the Risk Analysis Group and submitted to internal, interdepartmental, and external technical review before the draft risk analysis document is released for public consultation. The Risk Analysis Group of MAFBNZ then reviews the submissions made by interested parties and produces a review of submissions document. The review of submissions identifies any matters in the draft risk analysis that need amending in the final risk analysis although the decision to implement these changes lies with an internal committee of MAFBNZ. These documents inform the development of any resulting IHS by the Border Standards Group of MAFBNZ for issuing under Section 22 of the Biosecurity Act by the Director General of MAF on the recommendation of the relevant Chief Technical Officer (CTO).

Section 22(5) of the Biosecurity Act 1993 requires CTOs to have regard to the likelihood that organisms might be in the goods and the effects that these organisms are likely to have in New Zealand. Another requirement under Section 22 is New Zealand's international obligations and of particular significance in this regard is *The Agreement on Sanitary & Phytosanitary Measures* (the "SPS Agreement") of the World Trade Organisation.

A key obligation under the SPS Agreement is that sanitary and phytosanitary measures must be based on scientific principles and maintained only while there is sufficient scientific evidence for their application. In practice, this means that unless MAF is using internationally agreed standards, all sanitary measures must be justified by a scientific analysis of the risks posed by the imported commodity. Therefore, risk analyses are by nature scientific documents, and they conform to an internationally recognised process that has been developed to ensure scientific objectivity and consistency.

MAFBNZ released the draft document *Import risk analysis: Llamas (*Lama glama*) and alpacas (*Vicugna pacos*)* from specified countries for public consultation on 01 September 2010. Every step was taken to ensure that the risk analysis provided a reasoned and logical discussion, supported by references to scientific literature. The draft risk analysis was peer reviewed internally and externally and then sent for interdepartmental consultation. Relevant comments were incorporated at each stage of this review process. After extension, the closing date for public submissions on the risk analysis was 21 October 2010.

MAF received four responses to the draft risk analysis during the consultation period. Two of these were limited to general comments;

- 1) Ann Thompson, on behalf of Federated Farmers of New Zealand advised in an email dated 29 September advising that Federated Farmers would not be making a submission.
- 2) Martin Ellwood-Wade, on behalf of the New Zealand Alpaca Association, advised by email dated 21 October that: "We made sure that all the alpaca importers and other members of the Association were fully aware of the draft import risk analysis and the submission guidelines and were encouraged to make submissions. I also made the Camelid vet group aware so that they could also make a submission if they felt one

was required. As an Association we did not feel there was adequate time to develop a fully agreed submission on such a technical document”.

Two formal submissions were therefore received. Table 1. lists the submitters and the organisations they represent.

This document is MAFBNZ’s review of the submissions that were made by interested parties following the release of the draft risk analysis for public consultation. Public consultation on risk analyses is primarily on matters of scientific fact that affect the assessment of risk or the likely efficacy of any risk management options presented. For this reason, the review of submissions will answer issues of science surrounding likelihood, not possibility, of events occurring. Speculative comments and economic factors other than the effects directly related to a potential hazard are beyond the scope of the risk analysis and these will not be addressed in this review of submissions.

The two submissions are copied into Section 3. The review of submissions Section 2, examines the submissions received from Biosecurity Australia and Beef and Lamb New Zealand Ltd and the Meat Industry Association.

Table 1. Submitters and Organisations Represented

Submitter	Organisation Represented
Raana Asgar	Biosecurity Australia, Department of Agriculture, Fisheries and Forestry
Chris Houston	Beef and Lamb New Zealand Ltd and the Meat Industry Association

2. Review of Submissions

2.1. Raana Asgar, Biosecurity Australia, Department of Agriculture, Fisheries and Forestry

2.1.1. Biosecurity Australia: [covering letter] 'We were also unclear about how the options provided will be negotiated bilaterally following finalisation of this IRA . Australia would appreciate an opportunity to discuss in detail issues associated with this draft IRA which may become relevant to future discussions on a revised veterinary certificate for this trade. We suggest this could occur face-to-face during the next Trans-Tasman trade meeting'.

MAFBNZ response

Following the risk analysis process of consultation and review of submissions to make the import risk analysis final, the Imports and Exports Section of MAFBNZ decides on the appropriate combination of sanitary measures to ensure the effective management of identified risks.

These decisions are presented in a draft IHS and a Risk Management Proposal document which are released for a six-week period of stakeholder consultation.

Stakeholder submissions in relation to the draft IHS and Risk Management Proposal document are reviewed before a final IHS is issued.

MAFBNZ will consult Biosecurity Australia throughout the process of IHS development, and notes Biosecurity Australia's suggestion that detailed discussion could be an agenda item at the next trans-Tasman trade meeting.

2.1.2. Biosecurity Australia: Australia's preference is to certify country freedom for the following diseases and disease agents that have been identified as hazards in the IRA:

- * **foot and mouth disease**
- * **rabies**
- * **vesicular stomatitis**
- * **Bovine brucellosis (B. abortus)**
- * **Chlamydia abortus**
- * **Bovine tuberculosis (Mycobacterium bovis)**
- * **Trypanosoma species - tsetse transmitted trypanosomiasis and surra**

Please note that Australia is also free from Psoroptes ovis, bovine viral diarrhoea virus type 2 and bovine herpesvirus type 1.1 (BHV1.1) and BHV1.2a.

MAFBNZ response

MAF notes Australia's health status for these diseases, and associated preference for certification.

For *Psoroptes ovis* and bovine viral diarrhoea virus type 2 the risk analysis makes special reference to Australia and New Zealand both being free.

For bovine herpesvirus type 1.1 (BHV1.1) and BHV1.2a, the following will be added into the epidemiology section 10.1.4. of the risk analysis: 'Australia reports that BHV-1.2b is present but BHV-1.1 and BHV-1.2a has never occurred (Animal Health Australia 2010).'

Reference to be added:

Animal Health Australia (2010) *Animal Health in Australia Report*. [Online] Available from: <http://www.animalhealthaustralia.com.au/status/ahia.cfm> [Accessed 12th November 2010].

2.1.3. Biosecurity Australia: Equine Herpesvirus type 1 - page 41 Australia would prefer option 1 or option 2 on page 44. The third option is less desirable due to cost considerations.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.1.4. Biosecurity Australia: Bacillus anthracis - page 69 The OIE measures of premises freedom or vaccination are acceptable to Australia.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.1.5. Biosecurity Australia: Coxiella burnetti page 85 AQIS has advised that option 1 is optimal in Australia's case.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.1.6. Biosecurity Australia: Leptospirosis page 89 Australia would prefer no restrictions are placed on trade due to the reasons stated in the 2009 report of the Terrestrial Animal Health Standards Commission, as outlined in dot point 9 on page 92 of the IRA.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.1.7. Biosecurity Australia: Mycoplasma haemolamae page 100 Australia would prefer the first option given in dot point 1 on page 102 as being optimal in terms of facilitating a viable, ongoing trade.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

The risk management options presented in this chapter of the risk analysis will be amended from dot points to numbering for consistency. Therefore, dot point 1 will become option 1.

2.1.8. Biosecurity Australia: Salmonella species page 107 Australia would prefer option 1 for the reasons stated in the explanatory note under this option on page 109.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.1.9. Biosecurity Australia: Internal parasites page 125 Australia would prefer option 1 for the reasons stated in the explanatory note under this option on page 129.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.1.10. Biosecurity Australia: Mites, lice and fleas page 131 The options presented are confusing - it is unclear how the various options would be combined. For example, option 5 would not apply since Australia is free of *P. ovis*. In addition, there are legal issues regarding off-label use. A number of options presented cannot be met as the products currently registered cannot be used off-label. Australia would prefer to negotiate risk management measures that are implementable and which enable certification that do not conflict with with current Australian federal and State and Territory legislation.

MAFBNZ response

MAF acknowledges in the risk analysis that Australia is officially free from *P. ovis*. Therefore, option 5 or any other option for managing this particular mite will not apply to Australia.

The options presented cover animals coming from Canada, the USA, Central and South America, the EU, as well as Australia. The risk management option required will be commensurate with the risk posed by the exporting country.

MAF acknowledges that there may be some challenges in implementing some of the options given in the risk analysis. However, the options are intended to convey a range of possible levels of risk mitigation.

This comment will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.1.11. Biosecurity Australia: Ticks page 136 It is unclear as to which options would be implemented. AQIS has also highlighted their concern regarding their ability to meet the description of how to maintain a tick free facility. They have suggested that current import requirements for the facility are preferable.

MAFBNZ response

MAF acknowledges AQIS's concerns in regards their ability to meet the description of how to maintain a tick-free facility. MAF notes AQIS's suggestion that current requirements are preferable. This comment will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2. Chris Houston, Beef and Lamb New Zealand Ltd (B+LNZ) and the Meat Industry Association (MIA)

2.2.1. B+LNZ and MIA: We note that the document erroneously refers to the EU and South America as countries. For clarity, we suggest the document include a definition of the term 'South America', as there is potential for confusion particularly with reference to Central American countries, those in the Caribbean and the Falkland Islands.

MAFBNZ response

Noted. The words 'Central and' will be incorporated into the *Scope* section on page 4 of the risk analysis to read: This risk analysis is restricted to camelids imported from Australia, Canada, the United States of America (USA), Central and South America and the European Union (EU).

2.2.2. B+LNZ and MIA lack the resources to provide a thorough analysis of the evidence base that supports this risk analysis as presented. Accordingly, and acknowledging MAF's mandate in this area, both organisations place a high level of trust in the judgement and expertise of the officials who author and oversee the production of these documents.

MAFBNZ response

Noted.

2.2.3. B+LNZ and MIA: Borna disease virus. This disease appears to present a significant risk to the New Zealand cattle and sheep populations. Given that: This disease has been shown to infect camelids [and] the epidemiology is not understood among these species ('reported extremely rarely' does not give any indication regarding actual prevalence of infection unless qualified by sensitivity of surveillance system). Accordingly, we question if the assessment of the entry of BDV into NZ associated with live camelids can appropriately be described as 'negligible'. We note the practical issues associated with testing animals for BDV, but these notwithstanding we suggest re-examination of what measures could practically be put in place to manage the risk of BDV from animals sourced from areas where the virus is considered endemic.

MAFBNZ response

Borna disease is not regarded by the OIE as important to trade of animals and animal products. Borna disease occurs rarely and sporadically only in a geographically confined area of Europe, predominantly in horses and sheep, and exceptionally in a variety of other animals. The risk analysis notes that there is only the one report in camelids, from 35 years ago. There is no evidence to suggest that importing camelids that meet the commodity definition (certified on the day of shipment to be showing no clinical signs of infectious or parasitic disease) would pose a risk to the New Zealand cattle and sheep populations.

A key obligation under the SPS Agreement is that sanitary and phytosanitary measures must be based on scientific principles and maintained only while there is sufficient scientific evidence for their application. No scientific evidence has been submitted that would change the conclusion of the entry assessment, or provide the necessary scientific justification for imposing measures.

2.2.4. B+LNZ and MIA: Bovine viral diarrhoea virus. The concern here is the risk of introduction of the exotic type 2 BVD strains. We have concerns that as tests for BVD appear to not have been validated in camelids, then any testing regime cannot be relied upon to detect infection. We therefore suggest that management option 3 – only allow live imports from Australia – is the appropriate approach to managing this risk.

MAFBNZ response

Antigen detection is the key to classifying animals as infected with BVDV or not. For reasons set out in the risk analysis, MAF supports PCR as the test of choice rather than antigen ELISA. In addition, the OIE *Manual of Diagnostic Tests* lists virus isolation as a prescribed test for international trade.

MAF acknowledges that the submitter suggests that option 3, only allowing animals from BVDV2 free countries is the appropriate approach to managing this risk. This comment will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.5. B+LNZ and MIA: Foot and mouth disease virus. Owing to the potentially devastating impacts of this virus, we submit that management option 4 be imposed – only importation from countries that are recognised by the OIE as free from FMD without vaccination.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.6. B+LNZ and MIA: Louping ill virus. We are unsure to what extent we can have confidence that ticks in New Zealand can transmit this virus. We suggest that if significant uncertainty exists then it is appropriate to put measures in place to manage risks associated with this louping ill virus.

MAFBNZ response

There is no evidence that any other tick species except *Ixodes ricinus* play any significant role in the epidemiology of Louping ill.

A key obligation under the SPS Agreement is that sanitary and phytosanitary measures must be based on scientific principles and maintained only while there is sufficient scientific evidence for their application. No scientific evidence has been submitted that would change the hazard identification conclusion, or provide the necessary scientific justification for imposing measures.

2.2.7. B+LNZ and MIA: Vesicular stomatitis virus. We do not agree that “as the disease is rare in camelids, it could be considered that no measures are necessary”, as set out on page 61 (measure 1). This would not provide a satisfactory level of risk management in our opinion. We request management measures 2 and 4 be applied, in accordance with the Code.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.8. B+LNZ and MIA: *Anaplasma phagocytophilum*. We are unsure to what extent we can have confidence that ticks in New Zealand can transmit this bacterium. We suggest that if significant uncertainty exists then it is appropriate to put measures in place to manage the associated risks. As infection of camelids has been reported in the scientific literature, then we feel that it is of little relevance that camelids are 'considered an accidental host' (as stated on p67).

MAFBNZ response

There is no evidence that any ticks other than the *Ixodes* spp. mentioned in the risk analysis play any significant role in the epidemiology of tick-borne fever.

A key obligation under the SPS Agreement is that sanitary and phytosanitary measures must be based on scientific principles and maintained only while there is sufficient scientific evidence for their application. No scientific evidence has been submitted that would change the hazard identification conclusion, or provide the necessary scientific justification for imposing measures.

2.2.9. B+LNZ and MIA: *Bacillus anthracis*. We submit that an appropriate management regime for anthrax should include a combination of either options 1 & 2 or 1 & 3.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.10. B+LNZ and MIA: *Brucella* spp. We submit that owing to the significant consequences associated with the brucellae, then management option 1 (no restrictions) is not acceptable. Given that: little is known about brucellosis in camelids, although they are known to be susceptible, and diagnostic tests have not been appear not to have been validated in these species, then importation should only be permitted from countries recognised as free – management option 4.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.11. B+LNZ and MIA: *Burkholderia pseudomallei*. We request more analysis and explanation of why, given the cited evidence for infection of camelids in Australia, that measures for imports from Australia are not proposed.

MAFBNZ response

The organism is a saprophyte and opportunistic pathogen of humans and animals that is acquired from the environment. Direct transmission from animal to animal does not occur. The organism is restricted to tropical/subtropical equatorial regions of the world and has never established in temperate regions.

The consideration of this organism in this risk analysis is consistent with its consideration in other MAF risk analyses.

There has been just one report in an alpaca in Australia. The likelihood that camelids that meets the commodity definition (certified on the day of shipment to be showing no clinical

signs of infectious or parasitic disease) would introduce the organism and that it would establish is considered negligible.

2.2.12. B+LNZ and MIA: *Chlamidophyla* spp. The statement 'no evidence was found to confirm that camelids can be infected with *C. abortus*' doesn't reflect the evidence that strongly suggests that this is possible / likely, hence we do not support the imposition of risk management option 1 (no restrictions). Option 2 appears acceptable provided the CFT is known to be sufficiently sensitive in camelids. Option 4 is acceptable.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.13. B+LNZ and MIA: *Coxiella burnetii*. We do not agree that management option 1 effectively manages risk associated with animals incubating the disease. Either options 2 or 3 appear reasonable provided we can have confidence in the sensitivity of serology in all species of camelid under discussion. We are not able to assess this with any degree of rigor.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.14. B+LNZ and MIA: *Mycobacterium bovis*. Option 1 is not acceptable given that NZ controls this pathogen, albeit not in camelids. The text as presented is slightly confusing concerning the use of 'high status' and 'low status' as these terms mean entirely different things if applied to 'health status' or to 'risk status' Option 3 appears adequate.

MAFBNZ response

Noted. Under the SPS Agreement, member countries must "ensure that their sanitary and phytosanitary measures do not arbitrarily or unjustifiably discriminate between Members where identical or similar conditions prevail, including between their own territory and that of other Members". Since camelids are not subjected to any control measures, under our international obligations it would not be possible to impose measures on imported camelids.

However, measures may be justifiable for camelids originating from countries where the prevalence of infection is higher than in this country. In other words, measures could be imposed on those countries that have a tuberculosis status that is lower (higher prevalence of infection) than New Zealand.

For clarity, the N.B. for option 2 will have the 'higher health status' wording amended to become 'higher bovine tuberculosis status' the wording for option 3 in the risk analysis will be changed to: For countries where the prevalence of bovine tuberculosis is higher than New Zealand.

This comment will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.15. B+LNZ and MIA: Trypanosomiasis. We do not support imposition of management option 1, nor options 2 & 3 individually applied. We support option 5. Option 4 appears sufficient if serology is sufficiently sensitive.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.16. B+LNZ and MIA: Echinococcus granulosus. The statement “an IHS cannot apply post-clearance” appears to contradict the requirements for importation of cats from the UK, where we understand that importers are required to keep cats indoors for a period of 30 days. We are concerned that there currently appears to be little to no communications or enforcement activities directed at ensuring compliance with post-border restrictions on feeding offal to dogs (as set out in the Controlled Area Notice), rendering this measure ineffective. We request that options one AND two be implemented, including amendment of the Biosecurity (Imported Animals and Gerplasm) Regulations to include camelids as soon as possible.

MAFBNZ response

An IHS cannot include obligations that apply post-clearance. Importers of cats are not required to keep them indoors for a period of 30 days after receiving biosecurity clearance.

MAF notes the preference for options 1 and 2. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.17. B+LNZ and MIA: Internal parasites. We support the inclusion of management options that involve both treatment and testing for a spectrum of relevant parasite species – non-management of these risks at or pre-border is not acceptable.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.18. B+LNZ and MIA: Mites lice and fleas. We request that management option 7 be imposed and do not support any measures that are less stringent than a) those currently in place in NZ, b) those adopted by Australia.

MAFBNZ response

Noted. Option 6 (which is referred to in option 7) would not apply to Australia as it is free from *P. ovis*. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.19. B+LNZ and MIA: Ticks. Tick infestation and TBDs are a significant concern to our industry. We request that any appropriate risk management regime must include: a) Effective treatment, AND b) Sensitive inspection AND c) Management of the quarantine environment to prevent reinfestation where appropriate (cleaning, bedding replacement etc).

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.20. B+LNZ and MIA: Screwworms. We support management option 3 and are concerned that options 1 & 2 together may not be sufficiently robust.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

2.2.21. B+LNZ and MIA: Weeds and seeds. We support measures to manage risks associated with invasive weeds of pasture.

MAFBNZ response

Noted. This will be considered when decisions are made regarding risk management measures in the draft IHS. As mentioned earlier the draft IHS and Risk Management Proposal will be released for a six-week period of stakeholder consultation.

3. Copies of Submissions

3.1. Raana Asgar, Biosecurity Australia, Department of Agriculture, Fisheries and Forestry

Sent: Thursday, 21 October 2010.

Subject: Australia's Submission on BNZ IRA on Llamas and Alpacas.

Thank you for the opportunity to comment on Biosecurity New Zealand's (BNZ's) draft import risk analysis (IRA) on llamas and alpacas from specified countries, including Australia.

Animal Biosecurity, in consultation with the Australian Quarantine and Inspection Service (AQIS), has reviewed the draft IRA. Our comments below are quite brief as we were unsure about the level of detail required. We were also unclear about how the options provided will be negotiated bilaterally following finalisation of this IRA .

Australia would appreciate an opportunity to discuss in detail issues associated with this draft IRA which may become relevant to future discussions on a revised veterinary certificate for this trade. We suggest this could occur face-to-face during the next Trans-Tasman trade meeting.

Australia's preference is to certify country freedom for the following diseases and disease agents that have been identified as hazards in the IRA:

- * foot and mouth disease
- * rabies
- * vesicular stomatitis
- * Bovine brucellosis (B. abortus)
- * Chlamydia abortus
- * Bovine tuberculosis (Mycobacterium bovis)
- * Trypanosoma species - tsetse transmitted trypanosomiasis and surra

Please note that Australia is also free from Psoroptes ovis, bovine viral diarrhoea virus type 2 and bovine herpesvirus type 1.1 (BHV1.1) and BHV1.2a.

Equine Herpesvirus type 1 - page 41

Australia would prefer option 1 or option 2 on page 44. The third option is less desirable due to cost considerations.

Bacillus anthracis - page 69

The OIE measures of premises freedom or vaccination are acceptable to Australia.

Coxiella burnetii page 85

AQIS has advised that option 1 is optimal in Australia's case.

Leptospirosis page 89

Australia would prefer no restrictions are placed on trade due to the reasons stated in the 2009 report of the Terrestrial Animal Health Standards Commission, as outlined in dot point 9 on page 92 of the IRA.

Mycoplasma haemolamae page 100

Australia would prefer the first option given in dot point 1 on page 102 as being optimal in terms of facilitating a viable, ongoing trade.

Salmonella species page 107

Australia would prefer option 1 for the reasons stated in the explanatory note under this option on page 109.

Internal parasites page 125

Australia would prefer option 1 for the reasons stated in the explanatory note under this option on page 129.

Mites, lice and fleas page 131

The options presented are confusing - it is unclear how the various options would be combined. For example, option 5 would not apply since Australia is free of *P. ovis*. In addition, there are legal issues regarding off-label use. A number of options presented cannot be met as the products currently registered cannot be used off-label. Australia would prefer to negotiate risk management measures that are implementable and which enable certification that do not conflict with with current Australian federal and State and Territory legislation.

Ticks page 136

It is unclear as to which options would be implemented. AQIS has also highlighted their concern regarding their ability to meet the description of how to maintain a tick free facility. They have suggested that current import requirements for the facility are preferable.

Yours sincerely

Raana Asgar

Dr Raana Asgar BVSc MVPHMgt

Senior Veterinary Officer

Animal Biosecurity|Biosecurity Services Group

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3.2. Chris Houston, Beef and Lamb New Zealand Ltd and the Meat Industry Association

Sent: Tuesday, 19 October 2010

Subject: B+LNZ & MIA submission on Camelids RA



SUBMISSION TO
MAF BIOSECURITY NEW ZEALAND

On the consultation document:

***'Import risk analysis: Llamas (*Lama glama*) and
alpacas (*Vicugna pacos*) from specified countries'***

By Beef + Lamb New Zealand Ltd and the Meat
Industry Association

19 October 2010

1. Introduction

1.1 Beef + Lamb New Zealand Ltd (B+LNZ) and the Meat Industry Association (MIA) welcome the opportunity to make a submission on the document "Import risk analysis: Llamas (*Lama glama*) and alpacas (*Vicugna pacos*) from specified countries - DRAFT FOR PUBLIC CONSULTATION"

1.2 B+LNZ is an industry-good body funded under the Commodity Levies Act through a levy paid by producers on all cattle and sheep slaughtered in New Zealand. B+LNZ's activities aim to increase preference for New Zealand beef and sheep meat internationally and domestically; to maintain and extend trade access for New Zealand red meat; and to fund research and development to help improve the profitability of New Zealand farmers.

1.3 B+LNZ's contact for this submission is:

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1.4 The Meat Industry Association of New Zealand Inc (MIA) is a voluntary trade association representing New Zealand meat processors, marketers and exporters. It is an incorporated society (owned by members) that represents companies' supplying the majority of New Zealand sheep meat exports and all beef exports.

1.5 MIA's contact for this submission is:

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2. General comments

- 2.1. We note that the document erroneously refers to the EU and South America as countries. For clarity, we suggest the document include a definition of the term 'South America', as there is potential for confusion particularly with reference to Central American countries, those in the Caribbean and the Falkland Islands.
- 2.2. B+LNZ and MIA lack the resources to provide a thorough analysis of the evidence base that supports this risk analysis as presented. Accordingly, and acknowledging MAF's mandate in this area, both organisations place a high level of trust in the judgement and expertise of the officials who author and oversee the production of these documents.

3. Disease specific comments

3.1. Borna disease virus

This disease appears to present a significant risk to the New Zealand cattle and sheep populations. Given that:

- This disease has been shown to infect camelids
- The epidemiology is not understood among these species ('reported extremely rarely' does not give any indication regarding actual prevalence of infection unless qualified by sensitivity of surveillance system).

Accordingly, we question if the assessment of the entry of BDV into NZ associated with live camelids can appropriately be described as 'negligible'.

We note the practical issues associated with testing animals for BDV, but these notwithstanding we suggest re-examination of what measures could practically be put in place to manage the risk of BDV from animals sourced from areas where the virus is considered endemic.

3.2. Bovine viral diarrhoea virus

The concern here is the risk of introduction of the exotic type 2 BVD strains. We have concerns that as tests for BVD appear to not have been validated in camelids, then any testing regime cannot be relied upon to detect infection. We therefore suggest that management option 3 – only allow live imports from Australia – is the appropriate approach to managing this risk.

3.3. Foot and mouth disease virus

Owing to the potentially devastating impacts of this virus, we submit that management option 4 be imposed – only importation from countries that are recognised by the OIE as free from FMD without vaccination.

3.4. Louping ill virus

We are unsure to what extent we can have confidence that ticks in New Zealand can transmit this virus. We suggest that if significant uncertainty exists then it is appropriate to put measures in place to manage risks associated with this louping ill virus.

3.5. Vesicular stomatitis virus

We do not agree that "*as the disease is rare in camelids, it could be considered that no measures are necessary*", as set out on page 61 (measure 1). This would not provide a satisfactory level of risk management in our opinion.

We request management measures 2 and 4 be applied, in accordance with the Code.

3.6. Anaplasma phagocytophilum

We are unsure to what extent we can have confidence that ticks in New Zealand can transmit this bacterium. We suggest that if significant uncertainty exists then it is appropriate to put measures in place to manage the associated risks.

As infection of camelids has been reported in the scientific literature, then we feel that it is of little relevance that camelids are '*considered an accidental host*' (as stated on p67).

3.7. Bacillus anthracis

We submit that an appropriate management regime for anthrax should include a combination of either options 1 & 2 or 1 & 3.

3.8. Brucella spp

We submit that owing to the significant consequences associated with the brucellae, then management option 1 (no restrictions) is not acceptable.

Given that:

- little is known about brucellosis in camelids, although they are known to be susceptible, and
- diagnostic tests have not been appear not to have been validated in these species,

then importation should only be permitted from countries recognised as free – management option 4.

3.9. Burkholderia pseudomallei

We request more analysis and explanation of why, given the cited evidence for infection of camelids in Australia, that measures for imports from Australia are not proposed.

3.10. Chlamidophyla spp

The statement 'no evidence was found to confirm that camelids can be infected with *C. abortus*' doesn't reflect the evidence that strongly suggests that this is possible / likely, hence we do not support the imposition of risk management option 1 (no restrictions).

Option 2 appears acceptable provided the CFT is known to be sufficiently sensitive in camelids.

Option 4 is acceptable

3.11. Coxiella burnetii

We do not agree that management option 1 effectively manages risk associated with animals incubating the disease.

Either options 2 or 3 appear reasonable provided we can have confidence in the sensitivity of serology in all species of camelid under discussion. We are not able to assess this with any degree of rigor.

3.12. Mycobacterium bovis

Option 1 is not acceptable given that NZ controls this pathogen, albeit not in camelids.

The text as presented is slightly confusing concerning the use of 'high status' and 'low status' as these terms mean entirely different things if applied to 'health status' or to 'risk status'

Option 3 appears adequate.

3.13. Trypanosomiasis

We do not support imposition of management option 1, nor options 2 & 3 individually applied.

We support option 5. Option 4 appears sufficient *if* serology is sufficiently sensitive.

3.14. Echinococcus granulosus

The statement "*an IHS cannot apply post-clearance*" appears to contradict the requirements for importation of cats from the UK, where we understand that importers are required to keep cats indoors for a period of 30 days.

We are concerned that there currently appears to be little to no communications or enforcement activities directed at ensuring compliance with post-border restrictions on feeding offal to dogs (as set out in the Controlled Area Notice), rendering this measure ineffective.

We request that options one AND two be implemented, including amendment of the Biosecurity (Imported Animals and Gerplasm) Regulations to include camelids as soon as possible.

3.15. Internal parasites

We support the inclusion of management options that involve both treatment and testing for a spectrum of relevant parasite species – non-management of these risks at or pre-border is not acceptable.

3.16. Mites lice and fleas

We request that management option 7 be imposed and do not support any measures that are less stringent than a) those currently in place in NZ, b) those adopted by Australia.

3.17. Ticks

Tick infestation and TBDs are a significant concern to our industry. We request that any appropriate risk management regime must include:

- a) Effective treatment, AND
- b) Sensitive inspection AND
- c) Management of the quarantine environment to prevent re-infestation where appropriate (cleaning, bedding replacement etc)

3.18. Screwworms

We support management option 3 and are concerned that options 1 & 2 together may not be sufficiently robust.

3.19. Weeds and seeds

We support measures to manage risks associated with invasive weeds of pasture.

4. Concluding remarks

- 4.1. B+LNZ and MIA appreciate the opportunity to provide comment on this document, and the provision of a short extension to the review period in particular. Please do not hesitate to contact us should you require clarification of any of the points raised above.