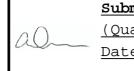
Grant, Colin

From: Sent: To: Hugh.Millar@dpi.vic.gov.au Monday, 25 March 2013 6:46 PM Grant, Colin



Submission No. 01.6 (Quarantine Facility) Date: 27/03/13

Dear Colin

I apologise for the delay, but please find as follows my comments and views on the matters you have raised.

1. The assertion that the co-location of the live bird and hatching egg facilities is not an appropriate response to the biosecurity risks posed by these commodities, despite the segregation of both species and individual shipments in separate QC 3 containment areas.

I am advised that the hatched chicks will be housed in series of side by side, independently operable, self contained units of biosecurity level 3 (all in the same envelope) and the facility will have the ability to accommodate a single large intake of eggs of single species, single age or 3 different avian species of different ages (each group will be completely separated from one another).

Similarly, the live bird quarantine unit will be completely physically separated in a biocontainment sense from the hatching egg facilities.

Given the comprehensive biocontainment measures - both physical (such as air handling and solid/liquid waste handling, the shower and personal decontamination procedures for staff) and in terms of personnel management (no staff or visiting personnel can move between the biosecure units)- I have no concern with the fact that the live bird and hatching egg facilities are housed within a single outer building envelope. Under these conditions, I am satisfied that the biosecurity risks posed by each consignment of imported birds/eggs will be appropriately contained and managed.

2. Following on from the first point, the appropriateness of the multiple intake approach allowing parallel operation of the avian facilities through individual QC3 chambers independently operated, but located in the same building envelope.

I am satisfied that the design and operational parameters set out in the proposal allow for the safe application of a multiple intake approach, as explained above.

3. The issue raised of the potential for airborne pathogens to spread from and to horses, dogs or cats and birds within and outside the facility and the risk of cross-contamination between compounds and animal species

Each of the two independent equine facilities will be operated on an "all-in-all-out" basis. Accordingly there can be no cross contamination or disease spread between consecutive consignments of horses within each facility. It is currently- and has been long-standing - an accepted requirement for equine quarantine units to be physically separated from other horses by a distance of at least 100 metres. This distance effectively manages the risk of airborne spread of pathogens. A significant feature of the proposed facility is that the 100 metre buffer will be incorporated into the facility itself. This is not a feature of each of the post-arrival equine quarantine stations currently operating. This makes the proposed facility superior in that it does not rely on surrounding land use to create a horse-free buffer.

There is effectively no risk of airborne pathogen transfer between horses and dogs and cats at the proposed facility. The rare transmission of equine influenza reported during the Australian outbreak in 2007 occurred when dogs were in close contact with horses at an infected stable. This form of transmission cannot occur at the proposed facility. Indeed, dogs, cats and horses are housed at the quarantine stations currently operating without incident or concern.

Post-arrival quarantine of dogs and cats is not imposed for managing any exotic virus disease spread by a common air space i.e the airborne route.

In addition, Australia's import policy and procedures ensure that the risk of exotic disease is predominantly managed off-shore

before animals arrive in the quarantine facility. Decisions would be risk based (based on the containment measures built into each of the holding units within the facility) rather than it being necessary to 'close down the entire facility'. Indeed there are potential advantages in having a single well designed and maintained facility with appropriate levels of professionally trained staff and back up support.

4. The need for on-site accommodation to support industry involvement in equine and avian operations when alternatives close to the facility are available and remote monitoring of alarms will be installed, and the facility will be monitored/staffed by DAFF 24/7; and

Experience has shown that housing grooms and other industry personnel <u>within</u> a quarantine facility actually adds to the risks associated with personnel entry, particularly out of hours. With appropriate monitoring technology installed, and the proposal to have DAFF staff present at the facility 24 hours a day, there is no justification for the construction of housing accommodation for grooms and other visiting industry personnel within the facility.

5. The horse industries preference for access to track exercise facilities for animals during a period of quarantine despite the associated management overhead costs and risks that this attaches outside of the achievement of the required biosecurity outcomes.

This is primarily a matter for the Australian Government to determine as the operator of the facility.

Regards

Hugh

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