

**From:** Alistair Dick  
**Subject:** RE: Report re White Spot  
**Date:** Friday, 21 July 2017 9:24:53 AM

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Dear Michael, thank you for taking the time to outline the prawn farming sectors concerns regarding the resumption of raw prawn imports to our Deputy Prime Minister, Barnaby Joyce. I agree totally with all your sentiments and arguments, however upon reading Deputy PM, Joyce's letter of the 5<sup>th</sup> of July I believe there are two points in particular that I would like to see exploited further, through the Senate Enquiry and Inspector General's enquiry (Dr Helen Scott Orr).

These points relate to, Australia having an obligation to allowing agricultural imports, where *"the science says it's safe to do so"*. I would argue, as I have in giving submissions to the 2 days of the Senate Enquiry (including a number of peer reviewed scientific papers as evidence), that the science in every way indicates the dire risks involved with the importation of raw prawns containing the WSSV and the HIGH likelihood of these entering Australia's aquatic ecosystems, particularly through the bait and berley pathway.

The second point worthy of following up on, as we will do through our association is, the point that states, *"as soon as there is evidence that the biosecurity risk becomes unacceptable, the department will take immediate action, noting trade cannot be suspended without a valid reason"*.

We would argue that on the balance of all probabilities and given the overwhelming evidence and expert testimonies to date, that a very valid reason for continuing with the suspension of raw imports should be easily justifiably following the recent exotic disease incursion, and the extremely high likelihood that imports were the source of infection. And bait and/or berley as the likely pathway. This should form an extremely 'valid reason' to suspend trade, and we should be asking DPM Joyce, that following the resumption of trade in raw imports that it can be once again shown that WSSV can be detected from within the retail supply chain at anything above 5% prevalence (while zero tolerance is acceptable within Austrlian jurisdictions) that an immediate ban be put in place. The *science*, clearly points to the fact the cooking of prawn products is an acceptable means of mitigating WSSV (and other exotic viruses), as is the case for prawn feeds, and as we would have it, prawns leaving the control area.

As you have stated, it creates a very trade restrictive environment whereby the DAWR would allow the importation of raw prawns from countries that have recently shown a 100% failure rate for WSSV (Vietnam and Malaysia) through the Landos project, in the retail supply chain, and accepting a 5% failure rate from overseas countries. Our association has continually maintained for more than a decade that we support the importation of prawns that are both safe to eat and also do not pose an unacceptable biosecurity risk, which is why we have always wanted to reduce the complexity of the current arrangements and their openness to abuse and gaming of the system, by simply cooking all prawn products coming in. This would be consistent with the ALOP afforded to the pork, chicken and Salmon industries.

**Regards**

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